

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Sarah and Peter Barclay	S20.001	NFL - Natural Features and Landscapes	NFL - General	Oppose	Adopts submission points within Appendix A of Stoney Creek's submission. Considers there is a lack of evidence for the mapped extent of the Hokonui Hills ONL and Plan provisions. Concerned that limits on development potential are not proportionate to the potential environmental effects. The provisions do not recognise the benefits of farming activities which have low environmental effects.	Seeks the relief sought within the Stoney Creek submission. Change of chapter rules to allow good farming practices.
Sarah and Peter Barclay	S20.002	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Oppose	Considers that the blanket protections do not provide sufficient ability for pastoral farming practices such as fencing and vegetation clearance for farm tracks to be undertaken without resource consent.	Seeks the relief sought within the Stoney Creek submission. Change of chapter rules to allow good farming practices.
Sarah and Peter Barclay	S20.003	SASM - Sites and Areas of Significance to Māori	SASM - General	Oppose	Identifying the whole district as SASM may unnecessarily require consent and consultation for day-to-day farm activities, increasing time, cost and workload. As objectives and policies regarding Ngāi Tahu values have been incorporated into the plan, there is no justification for the entire district to be a SASM. The SASM chapter should instead provide further clarity to plan users by identifying and delineating those specific sites, areas and landscapes that are significant to Māori. Similar approaches have been undertaken in other recently reviewed district plans.	Sites and Areas of Significance to Māori are identified and mapped in the planning maps through a transparent, consistent process. .
Sarah and Peter Barclay	S20.004	SASM - Sites and Areas of Significance to Māori	SASM-O1	Oppose	Stoney Creek is concerned that the broad-brush approach within the PGDP creates uncertainty for plan users as to what activities require consultation with mana whenua and could increase time, cost and workload of day-to-day farm activities. The approach creates disproportionate onus on applicants and is also unclear what "appropriate considerations" (as referred to in Objective SASM-O1) may be. The SASM chapter should provide further clarity by identifying and delineating those specific sites.	Amend SASM-O1 to read: ~~All~~ Those lands, waterbodies, natural features, and marae within Gore District identified as Sites of Significance to Māori in the Planning Maps are recognised as sites and areas of cultural significance to mana whenua and/or tangata whenua, and are afforded appropriate considerations with regard to the cultural values identified in MW-2.3 in relation to their management, development, and use.
Sarah and Peter Barclay	S20.005	SASM - Sites and Areas of Significance to Māori	SASM-P1	Oppose	Stoney Creek requests that existing activities are provided for in accordance with s10 of the RMA.	Amend SASM-P1 to read: New u Use, subdivision, and development is enabled where adverse effects on ~~the~~ Ngāi Tahu cultural values, including those listed in MW-2.3, are avoided, remedied or mitigated. Council shall have regard to any other benefits (e.g. pest control) provided by the proposed activity.
Sarah and Peter Barclay	S20.006	SASM - Sites and Areas of Significance to Māori	SASM-P2	Oppose	Amendments are suggested to align with the concerns raised with regard to SASM-O1	Amend SASM-P2 to read: The impact of proposed activities on Sites of Significance to Māori as identified in the Planning Maps on ~~the~~ Ngāi Tahu cultural values identified in MW-2.3 , and their underlying relationship with the natural environment is determined in partnership with Hokonui Rūnanga and takes into account any benefits of the proposal.
Sarah and Peter Barclay	S20.007	ECO - Ecosystems and Indigenous Biodiversity	ECO-O1	Oppose	Stoney Creek supports the alignment NPSIB and requests that this objective reflect the wording contained within the NPSIB. The use of 'significant indigenous vegetation' and 'significant habitats of indigenous fauna' is unclear.	Amend ECO-O1 to read: Maintain Indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna ~~(Significant Natural Areas)~~ . through the identification of Significant Natural Areas.

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Sarah and Peter Barclay	S20.008	ECO - Ecosystems and Indigenous Biodiversity	ECO-O3	Oppose	The wording of this policy is more stringent than the NPSIB as it requires the "enhancement" of values. Amend wording to align with NPSIB.	Amend ECO-O3 to read: Provide for ~~appropriate new~~ subdivision, use and development within and adjacent to Significant Natural Areas where adverse effects on the values of the area can be avoided or managed . ~~maintained and enhanced.~~
Sarah and Peter Barclay	S20.009	ECO - Ecosystems and Indigenous Biodiversity	ECO-P2	Oppose	Existing activities within or affecting SNAs are provided for in Policy 9 and Clause 3.15 of the NPSIB. Amend wording to better align with the NPSIB objectives.	Amend ECO-P2 to read: ~~Allow~~ Enable activities within or affecting Significant Natural Areas that may impact the extent or ecological integrity of the SNA indigenous biodiversity values where: 1. ~~This~~ The activity is for a lawfully established activity; or 2. Their purpose is to facilitate or express Ngāi Tahu rights, interests, or cultural purpose; or 3. The activity has a functional or operational need to be located in the area; or ...
Sarah and Peter Barclay	S20.010	ECO - Ecosystems and Indigenous Biodiversity	ECO-P3	Amend	Stoney Creek supports the alignment of the PGDP objectives and policies with the wording of the NPSIB which allows for new subdivision, use or development where this is required to address a high risk to public health or safety.	Amend ECO-P3 to read: Any new subdivision, use, or development shall avoid adverse effects on an SNA that result in: 1. loss of ecosystem representation and extent; ... Unless: 6A. The activity is required to address a high risk to public health or safety. or: The activity relates to: ~~Unless they relate to:~~ ... 6. Construction of specified infrastructure that provides significant national or regional public benefit; 7. Mineral and aggregate extraction that provides significant national public benefit that could not otherwise be achieved using resource in New Zealand;
Sarah and Peter Barclay	S20.011	ECO - Ecosystems and Indigenous Biodiversity	ECO-P8	Oppose	ECO-P8 has a different set of criteria to the NPSIB. Managing effects on indigenous biodiversity outside of SNAs by applying the effects management hierarchy would be in line with the NPSIB.	Preferred relief: Withdraw ECO-P8 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised policy balanced provisions recognising that some vegetation removal is necessary and providing for this where effects are managed using the effects management hierarchy. Alternative relief: Amend Policy ECO-P8 to read: When assessing consents for subdivision, land use and development outside of SNAs, require applicants to demonstrate that effects on indigenous biodiversity will be managed by applying the effects management hierarchy, ~~avoid effects which will:~~ 1. ~~Prevent an indigenous species or community being able to persist in their habitats in the ecological district;~~ 2. ~~Result in a degradation of the threat status, further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the ecological district level;~~ 3. ~~Result in a reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a – nationally critical, nationally endangered and nationally vulnerable; and~~ 4. ~~discourage mana whenua access to indigenous biodiversity for a mana whenua cultural purpose~~
Sarah and Peter Barclay	S20.012	ECO - Ecosystems and Indigenous Biodiversity	ECO-P9	Oppose	ECO-P9 gives no weight to existing activities but should reflect that there may be lawfully established activities within or affecting SNAs that may require resource consent but do not have adverse effects on ecological values and may provide benefits such as pest control. ECP-P9 Point 8 refers to ECO-P7 for offsetting, however ECO-P7 does not refer to offsetting.	Amend ECO-P9 to read: When assessing resource consents in Significant Natural Areas, consider the following matters: ... 5. The effects the activity may have on the introduction, ~~or~~ spread or control of exotic pest plant and animal ~~weed~~ -species and pest animals both terrestrial and aquatic; ... 8. The appropriateness and effectiveness of any biodiversity offsetting or compensation ~~in accordance with ECO-P7~~ to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied. 9. Whether the activity is a lawfully established existing activity that is no grater in intensity, scale or character and will not result in a loss of extent or degradation of ecological integrity of a SNA.

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Sarah and Peter Barclay	S20.013	ECO - Ecosystems and Indigenous Biodiversity	ECO-P10	Amend	Stoney Creek supports the recognition of the benefits farmers provide in the management of indigenous biodiversity but wish to better recognise the extent of benefits. Clause 6 of ECO-P10 encouraging the provision of free ecological surveys, financial support and rates remissions for SNA landholders is supported.	Amend ECO-P10 to read: Maintain indigenous biodiversity across the district by:... 8. Recognising the benefits of farm management practices and active management of indigenous biodiversity, including but not limited to voluntary animal and plant pest and stock control, fencing, and/or formal legal protection. ...
Sarah and Peter Barclay	S20.014	ECO - Ecosystems and Indigenous Biodiversity	ECO-P11	Oppose	There may be situations where offsetting is appropriate but is not for cultural purposes or is consistent with other values or drivers.	Preferred relief:Withdraw ECO-P11 and redraft in consultation with key stakeholders, including Stony Creek Station.Alternative relief: Amend Policy-P11 as follows: Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity where: 1. The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity of similar species and location where practicable; or 2. The conservation outcomes are measurable and positive; and 3. The biodiversity offsets or compensation are in accordance with best practice, including but not limited to New Zealand Government guidance on biodiversity offsetting.; ~~and 4. Off setting and compensation packages are consistent with Ngāi Tahu cultural purposes~~
Sarah and Peter Barclay	S20.015	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose	Stoney Creek supports Indigenous Vegetation Clearance and Land Disturbance rules but finds Rule ECO-R1 too restrictive, especially for fencing. The rule's broad definition of "Land Disturbance" raises confusion, as it encompasses all land activities without clarification. The permitted width for disturbance is impractical for installing fences, it does not allow for access and maintenance. The rule lacks provisions for upgrading existing structures, which may have better environmental outcomes and should be enabled. Maintenance of improved pasture under ECO-R1(e) is more restrictive than NPSIB. The inclusion of a permitted activity rule for the incidental removal of indigenous species during exotic species control is supported but should be clarified in the rule. There should be no limits around the removal of deliberately planted vegetation. A restricted discretionary status would be more appropriate for minor environmental effects. Non-complying activity status for indigenous vegetation removal for those activities listed in ECO-R1(1) where this falls within a SNA does not acknowledge the presence of existing activities within SNAs (as allowed for under the NPSIB). Therefore, Discretionary activity status is proposed for these activities.	Preferred Relief:Withdraw ECO-R1 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised rule an exemption for indigenous vegetation removal and land disturbance associated with farming activities within the new Hokonui Hills Special Precinct (discussed further below).Alternative relief: Amend ECO-R1 as follows: Indigenous Vegetation Clearance and Land Disturbance associated with Indigenous Vegetation ClearanceActivity status: Permitted 1. It is necessary for the following purposes:~~(aa) The installation, maintenance, repair, replacement or upgrade of: (i) Fences(ii) Farm tracks (iii) Farm infrastructure~~ [Refer to proposed definition] (a) The maintenance, repair, or replacement or upgradeof existing lawfully established: ~~(i) fences,~~ (ii) vehicle tracks, (iii) roads, (iv) infrastructure, (v) walkways, (vi) firebreaks, (vii) dams, (viii) waterway crossings, or (ix) network utilities, ~~and the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i), and (vi)~~ ... (e) Maintenance of improved pasture outside of a SNA,~~where: (i) the improved pasture has not become a SNA, and (ii) the land is not an uncultivated depositional landform, and (iii) it will not adversely affect a Threatened or At Risk (declining) species. (f) In accordance with an approved Reserve Act or Conservation Act reserve management plan.~~ (g) For the maintenance, repair or replacement of existing buildings and structures, or to remove a potential fire risk, including an area no further than ~~2.0m~~ 7.5m from the exterior wall of an existing building. (h) The removal indigenous vegetation that is incidental to the removal of exotic species generally and pest plants and pest animals in accordance with any Regional Pest Management Plan or the Biosecurity Act 1993. ... k) The works relate to indigenous vegetation that was deliberately planted:~~(i) Within a~~

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						~~domestic garden; or~~ (ii) For the use of screening/shelter belt purposes (such as farm hedgerows). Activity status where compliance is not achieved with: ECO-R1(1) and ECO-R1(2)~~(a)(i) or ECO-R1(1)(a)(vi)~~ Restricted discretionary Where:1. The indigenous vegetation clearance and associated land disturbance takes place outside a Significant Natural Area. 2. The indigenous vegetation clearance and land disturbance does not comply with ECO-R1(1)(a)(i) or ECO-R1(1)(a)(vi). Matters of Discretion: 1. Effects on indigenous biodiversity values. 2. the matters outlined in ~~ECO-P3, ECO-P7, ECO-P8, ECO-P9~~ and ECO-P10. ...7. The benefits to indigenous biodiversity provided by the proposed activity.ECO-R1(3): Restricted Discretionary Matters of Discretion: 1. Effects on indigenous biodiversity values. 2. the matters outlined in ECO-P3, ECO-P7, ECO-P8, ECO-P9 and ECO-P10. 3. The quantity and quality of indigenous vegetation impacted and the reasons for the works. 4. The benefits of the proposed activity.5. The mitigation proposed. ECO-R1(1) and ECO-R1(2): Discretionary-Non-complyingWhere: 1. The indigenous vegetation clearance and land disturbance takes place inside a Significant Natural Area.<i>NOTE - the 1.5m limit for vegetation clearance and land disturbance associated with fences ECO-R1 was withdrawn by Council resolution on 21 November 2023</i>
Sarah and Peter Barclay	S20.016	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	indigenous vegetation clearance and land disturbance for any purpose other than those listed in ECO-R1(1) is a discretionary activity and there are instances where this is too restrictive. There's no provision for removing regenerating vegetation in areas lawfully cleared before. A proposed new rule aims to grant permitted activity status for minor vegetation clearance.	Add a new Rule ECO-R1(2): 2. Indigenous Vegetation Clearance and any associated land disturbance outside a SNA for any purpose other than listed in ECO-R1(1) or ECO-R1(3), provided:(a) The vegetation to be cleared is regenerating indigenous vegetation less than 15 years old, where the land was previously lawfully cleared of indigenous vegetation; or(b) The area of indigenous vegetation clearance does not exceed 500 m2 in any 12 month period.
Sarah and Peter Barclay	S20.017	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	The maintenance of improved pasture within or adjacent to a SNA is provided for in the NPSIB, but this is not reflected in the PGDP rule framework.	Add a new Rule ECO-R1(3): Indigenous vegetation clearance and any associated land disturbance required for the maintenance of improved pasture within or affecting a SNA where: (i) the maintenance of improved pasture is part of a regular cycle of periodic maintenance, and (ii) the intensity, scale or character of the effects are not increased, and (iii) the improved pasture has not itself become a SNA, and (iv) the land is not an uncultivated depositional landform, and (v) the maintenance will not adversely affect a Threatened or At Risk (declining) species.
Sarah and Peter Barclay	S20.018	NFL - Natural Features and Landscapes	NFL - General	Oppose	As drafted, the ONL chapter is fundamentally flawed as it fails to acknowledge the established presence of pastoral farming within mapped ONL areas and would significantly restrict farming activities. There seems to be no justification for this as comments in the S32 seem to contradict the change. Considers the evaluation and assessment in the report insufficient. The rule framework is overly restrictive particularly when the policy framework acknowledges the presence and benefits provided by existing pastoral farming within the Hokonui Hills ONL which, by GDC's own assessment, has not resulted in	Preferred Relief: Withdraw the Natural Features and Landscapes chapter in its entirety and redraft in consultation with key stakeholders, including Stony Creek Station. Stony Creek Station considers that an appropriate resolution would be to create a Hokonui Hills Special Precinct, within which rural activities associated with pastoral farming are permitted, with appropriate and practical limits set. The provisions of the other chapters of the PGDP would not apply to farming activities within the Hokonui Hills Special Precinct

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Sarah and Peter Barclay	S20.019	NFL - Natural Features and Landscapes	NFL-P1	Oppose	Inclusion of policies that recognise pastoral farming within ONLs but considers NFL-P1 does not go far enough to recognise the benefits of pastoral farming.	Amend NFL-P1 to read: Avoid adverse effects on the values and characteristics of identified outstanding natural features and landscapes described within Appendix 5 by: ... 2. Recognising the benefits provided by existing ~~existence of~~ working pastoral farms and their contribution to the openness and landform legibility of outstanding natural features and landscapes;
Sarah and Peter Barclay	S20.020	NFL - Natural Features and Landscapes	NFL-P4	Oppose	When assessing resource consents within the ONL, it is important to recognise the presence of existing activities within these areas.	Amend NFL-P4 to read: When assessing resource consents within Outstanding Natural Features and Landscapes, consider the following matters;... 4. The presence of existing activities within the ONL and whether the activity is changing in intensity, scale or character.
Sarah and Peter Barclay	S20.021	NFL - Natural Features and Landscapes	NFL - General	Amend	The Rule table within the NFL chapter states that the rules are applicable in "All zones". This is misleading as the rules only apply within an identified ONL or ONF.	Amend "All zones" under rules NFL-R1 to NFL-R8 to read "All areas identified as ONL/ONF in the Planning Maps".
Sarah and Peter Barclay	S20.022	NFL - Natural Features and Landscapes	NFL-R1	Oppose	The increased number of activities controlled in the Hokonui Hills ONL contradicts the comments made in the S32 report and there is seemingly no justification for the increase. The findings of the report are disputed, including the cost benefit analysis. Considers the rule framework overly restrictive and that it contradicts the policy framework which acknowledges the presence and benefits of pastoral farming, especially as the existing provision has not resulted in significant adverse effects.	Amend NFL-R1 to read: Activity status: Permitted Where: 1. The building or structure is for farming purposes, ~~excluding residential use~~ ; (a) Does not exceed ~~500 30~~ m ² in area; and (b) Height shall not exceed ~~8 3~~ m; 2. Buildings or structures for non-farming purposes; (a) The maximum height does not exceed 2m; and (b) The maximum gross floor area is no more than 5m ² 3. All buildings and structures (excluding fences and buildings and structures for farming purposes) must be finished in materials with a maximum reflectance value of 30%
Sarah and Peter Barclay	S20.023	NFL - Natural Features and Landscapes	NFL-R2	Amend	Supportive of permitted status for tree planting but it is not appropriate to limit this for certain purposes as this may discourage further planting e.g. where non-indigenous species may be required for wind breaks, shelter belts etc.	Amend NFL-R2 to read: Tree planting, other than plantation forestry within an identified ONF/L Activity status: Permitted Where: 1. The tree planting is of indigenous species or isrequired and for restoration, conservation, or hazard prevention measures, shelter belts, wind breaks, or to address land instability or erosion. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: 1. Effects on the values as listed in NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3.3. Any benefits provided by the proposed tree planting.
Sarah and Peter Barclay	S20.024	NFL - Natural Features and Landscapes	NFL-R3	Oppose	S32 report states the operative plan controls were effective at managing activities within ONLs. As such, additional controls in the PGDP are not supported and should align more with the controls that exist currently.	Amend Rule NFL-R3 to read: Land disturbance and earthworks within an identified ONF/L Activity status: Permitted Where: X. Required for cultivation, fencing or pest plant management; or X. Associated with the construction of any road or track no greater than 7 metres in width or requiring more than 2 metres of cut or fill for a total distance greater than 100 metres; or X. The earthworks do not exceed 100 linear metres in any direction; and 1. The depth of the earthworks shall not exceed ~~1m~~ 2m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~1m~~ 3m above the original surface

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						of the ground; and 3. the area of the earthworks shall not exceed 100m ² in any 12 month period; ~~and 4. the width of land disturbance for fencing shall not exceed 1m; and 5. the ground for fencing related land disturbance is reinstated to original levels within 48 hours of work being completed.~~
Sarah and Peter Barclay	S20.025	NFL - Natural Features and Landscapes	NFL-R4	Oppose	Supportive of permitted activity status that allows earthworks to maintain existing facilities within an ONL, however considers the scope of NFL-R4 to be too narrow.	Amend Rule NFL-R4 to read: Maintenance repair, replacement or upgrade of buildings and structures (excluding fences) , critical infrastructure, existing roads, farm tracks, walking and cycling trails, waterway crossings, or improved pasture within an identified ONF/L Activity status: Permitted Where: 1. The scale of the activity ~~critical infrastructure, road, farm or trail~~ is not increased. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5 resulting from an increase in the scale of the activity. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3. 3. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape.
Sarah and Peter Barclay	S20.026	NFL - Natural Features and Landscapes	NFL-R5	Oppose	Supportive of the inclusion of a permitted activity status for fences within the ONL, but questions why only post and wire fences are permitted. Fences are not visually dominant structures and are required for good animal husbandry, health and safety and stock management and are overly restricted within ONLs.	Amend Rule NFL-R5 to read: Fences within an identified ONF/L Activity status: Permitted Where: 1. The fence is required for the exclusion or control of stock or to delineate property boundaries. ~~a post and wire fence;~~ Note: fences are a structure and therefore subject to the river setback rules Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5.2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3.
Sarah and Peter Barclay	S20.027	NFL - Natural Features and Landscapes	NFL-R6	Oppose	NFL-R6 duplicates ECO-R1(1) and creates confusion as to which standard applies.	Delete Rule NFL-R6 in its entirety.
Sarah and Peter Barclay	S20.028	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Amend	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any new farm track is too restrictive to farming operations.	Add a new rule NFL-R6A: New farm tracks within an identified ONF/L. Activity status: Permitted. Where: 1. Any new farm track is no greater than 7 metres in width. 2. Unretained cut and fill batters shall not: (a) be steeper than 2 horizontal to 1 vertical; (b) be constructed using moisture content susceptible soils; (c) have a bench with a width of more than 1.8m. 3. Excess material from the construction of the farm track is reinstated to match the natural contour of the surrounding land. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5. 2. The necessity of what is proposed and any alternatives. 3. Mitigation measures proposed. 4. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape 5. The benefits of the proposed activity.
Sarah and Peter Barclay	S20.029	NFL - Natural Features and Landscapes	NFL-R6	Oppose	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any	Amend Rule NFL-R6 to read: New Roads, farm tracks greater than 7 metres in width , walking and cycling tracks within an identified ONF/L Activity status: Restricted Discretionary Matters of Discretion:

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					new farm track is too restrictive to farming operations.	1. Effects on the values as listed within NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW-2.3. ~~3. The necessity of what is proposed and any alternatives.~~ 4. Mitigation measures proposed. 5. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape 6. The benefits of the proposed activity
Sarah and Peter Barclay	S20.030	NFL - Natural Features and Landscapes	NFL-R7	Oppose	NFL-R7 does not distinguish between extraction of material for use outside of the property from where it was taken and farm quarries as defined in the PGDP.	Amend NFL-R7 as follows:NFL-R7 Mining and Quarrying (excluding farm quarries) within an identified ONF/L Non-Complying
Sarah and Peter Barclay	S20.031	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Amend	NFL-R7 does not distinguish between extraction of material for use outside of the property from where it was taken and farm quarries as defined in the PGDP.	Insert a new rule NFL-R7A: NFL-R7A Farm quarries that comply with GRUZ-R3. Activity status: Permitted
Sarah and Peter Barclay	S20.032	SUB - Subdivision	SUB-R1	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R1.
Sarah and Peter Barclay	S20.033	SUB - Subdivision	SUB-R4	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R4.
Sarah and Peter Barclay	S20.034	SUB - Subdivision	SUB-R11	Oppose	An amendment to exclude activities captured by SUB-R1 and SUB-R4 is sought.	Amend SUB-R11 as follows: Subdivision in any area of an Outstanding Natural Landscape, Outstanding Natural Feature or Significant Natural Area excluding activities captured by SUB-R1 and SUB-R4.
Sarah and Peter Barclay	S20.035	SUB - Subdivision	SUB-S1	Oppose	An 8ha minimum lot size does not allow for an efficient use of land and is too small to farm economically but would be a significant loss of productive land if farmers subdivide discrete areas of larger parcels.	Amend SUB-S1 as follows: 1. No lots to be created by subdivision, including balance lots, shall have a net site area less than the minimum specified: ... (h) General Rural - ~~8ha~~ 2 ha.
Sarah and Peter Barclay	S20.036	EW - Earthworks	EW - General	Oppose	Stoney Creek supports the recognition of the need for earthworks associated with rural production activities, however considers that the rules contained within the Earthworks Chapter do not reflect the specific constraints and complexities of the Hokonui Hills environment.	Preferred relief: Insert an exemption in the preamble of the chapter for any earthworks and land disturbance activities within the Hokonui Hills Special Precinct. Develop appropriate earthwork provisions for the Hokonui Hills Special Precinct, in consultation with key stakeholders, that reflect the site specific conditions and challenges of this area.
Sarah and Peter Barclay	S20.037	EW - Earthworks	EW-O1	Oppose	Minor changes to this Objective are proposed to reflect the purpose of the RMA.	Amend EW-O1 as follows: Earthworks and land disturbance for subdivision, land use and development are facilitated and undertaken in a manner that avoids, remedies or minimises adverse effects on the ~~surrounding~~ environment and protects the natural environment, Ngāi Tahu cultural values, people and property.
Sarah and Peter Barclay	S20.038	EW - Earthworks	EW-P1	Support	Supportive of the recognition of the need for earthworks associated with rural production activities.	Retain EW-P1(2) as drafted.
Sarah and Peter Barclay	S20.039	EW - Earthworks	EW - General	Oppose	It is unclear how Rules and Standards interact and there is no guidance clarifying the applicability of standards. The activity status should be set by the rule and not the standard, otherwise it is implied activities require consent under both the rule and the standard.	Amend table headings from 'Standards' to 'Standards for Permitted Activities'. Insert a guidance note clarifying whether Standards are applicable to all activities or only those listed within the relevant Rule. Clarify the relationship between rules and standards and whether standards are to be treated as standalone rules.

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Sarah and Peter Barclay	S20.040	EW - Earthworks	EW-Exemptions	Amend	Stoney Creek supports the listed exemptions from the Earthworks chapter, but questions the status of a note as opposed to a policy or rule.	Convert the exclusions note to a permitted activity rule in the Earthworks chapter.
Sarah and Peter Barclay	S20.041	EW - Earthworks	EW-R1	Oppose	The permitted provisions of EW-R1 are inconsistent and more restrictive than those proposed in the NFL chapter. The width of land disturbance permitted by the rule is not achievable for the installation of fences and is unworkable for a farming operation. General earthworks are permitted up to 1000m3, there is no commentary in the S32 report why fences are further restricted.	Amend Rule EW-R1 to read: Land disturbance for the construction of fences(All zones except ONLs) Activity status: PermittedWhere: ~~1. Any land disturbance does not exceed: (a) 1 metre in width for more than 10 metres in any 100 metre length; and/or (b) 1 metre in height or depth; and 2. The ground is reinstated to original levels within 48 hours of work being completed.~~ 3. The works are undertaken in accordance with Earthworks Standards EW-S3, EW-S5 and EW-S7. No other Earthworks Standards apply.
Sarah and Peter Barclay	S20.042	EW - Earthworks	EW-R7	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R7 as follows: General Rural ZoneExcluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R7 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4,EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whetherthere is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Sarah and Peter Barclay	S20.043	EW - Earthworks	EW-R8	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary tofurther restrict earthwork activities in the ONL.	Amend Rule EW-R8 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R8 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable

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						options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Sarah and Peter Barclay	S20.044	EW - Earthworks	EW-R9	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R9 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R9 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Sarah and Peter Barclay	S20.045	EW - Earthworks	EW-R14	Oppose	Stoney Creek supports a permitted activity standard for earthworks not otherwise provided for. It is considered existing protection of ONLs is achieved through other chapters and further restrictions are unnecessary in the Earthworks chapter.	Amend EW-R14 as follows: Earthworks and land disturbance not otherwise provided for General Rural Zone, Industrial Zone, Airport Zone ~~Excluding Historic Heritage sites, Significant Natural Areas, Outstanding Natural Landscapes or Features.:~~ Permitted 1. In any 12 month period, the total volume of earthworks does not exceed 1,000m3 per site. 2. All Earthworks Effects Standards are complied with. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: ...11. Whether there is a functional or operational need for the location of the activity
Sarah and Peter Barclay	S20.046	EW - Earthworks	EW-S3	Oppose	Earthworks for fencing activities for stock exclusion should be exempt from these requirements.	Amend EW-S3 as follows: Setbacks from rivers and streams 1. Earthworks (excluding where required for fencing for stock exclusion) shall be set back the minimum distances from the top of the closest bank of a river or stream as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and (c) 5m for low order rivers or streams (order 1 and 2).Refer to Appendix 3 for river and stream orders
Sarah and Peter Barclay	S20.047	EW - Earthworks	EW-S4	Oppose	It is onerous to consider that any earthworks on land over 15 degrees require a site specific geotechnical assessment, where these could be very minor activities with no adverse effects.	Amend EW-S4 as follows: Instability of Land 1. Earthworks shall not result in any instability of land or structures beyond the boundary of the site where the earthworks occur. ~~be undertaken on land with an existing slope angle exceeding 15 degrees.~~

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Sarah and Peter Barclay	S20.048	GRUZ - General Rural Zone	GRUZ-Additional provisions sought	Amend	Stoney Creek seeks specific zoning for activities within the Hokonui Hills area to recognise the presence of farming activities and protections for the values of the area with specific objectives policies and rules. Activities within the Hokonui Hills Special Precinct should be exempt from the GRUZ rules.	Insert Hokonui Hills Special Precinct. Develop appropriate provisions for the Hokonui Hills Special Precinct, in consultation with key stakeholders, that reflect the site-specific conditions and challenges of this area.
Sarah and Peter Barclay	S20.049	GRUZ - General Rural Zone	GRUZ - General	Oppose	Supportive of objectives, policies and rules specific to rural activities but should not duplicate the more site specific provisions that within the proposed Hokonui Hills Special Precinct.	Insert an exemption in the preamble of the chapter for any activities within the Hokonui Hills Special Precinct.
Sarah and Peter Barclay	S20.050	GRUZ - General Rural Zone	GRUZ-O1	Support	Stoney Creek supports the inclusion of an objective recognizing the importance of primary production to the District.	Retain GRUZ-O1 as drafted.
Sarah and Peter Barclay	S20.051	GRUZ - General Rural Zone	GRUZ-O2	Amend	Supportive of the description of the character and qualities of the rural zone but consider that a 'very low degree' of built form does not reflect the nature of the zone.	Amend GRUZ-O2 as follows: The character and qualities of the General Rural zone comprise: ... 2. a ~~very~~ low degree of built form, well setback from other properties and roads; and ...
Sarah and Peter Barclay	S20.052	GRUZ - General Rural Zone	GRUZ-O3	Support	Supportive of recognizing the importance of supporting activities for primary production.	Retain GRUZ-O3 as drafted.
Sarah and Peter Barclay	S20.053	GRUZ - General Rural Zone	GRUZ-O4	Support	Supportive of GRUZ-O4.	Retain GRUZ-O4 as drafted.
Sarah and Peter Barclay	S20.054	GRUZ - General Rural Zone	GRUZ-O5	Amend	supportive of GRUZ-O5, but considers that it is expanded to cover all rural land and not just highly productive land.	Amend GRUZ-O5 as follows: The value and long-term benefits of using ~~highly productive rural~~ land for primary production is recognised and the availability of highly productive land for primary production for future generations is protected.
Sarah and Peter Barclay	S20.055	GRUZ - General Rural Zone	GRUZ-P1	Support	Supportive of GRUZ-P1.	Retain GRUZ-P1 as drafted.
Sarah and Peter Barclay	S20.056	GRUZ - General Rural Zone	GRUZ-P2	Support	Supportive of enabling rural industry in the rural zone.	Retain GRUZ-P2 as drafted.
Sarah and Peter Barclay	S20.057	GRUZ - General Rural Zone	GRUZ-P3	Support	Supportive of GRUZ-P3.	Retain GRUZ-P3 as drafted.
Sarah and Peter Barclay	S20.058	GRUZ - General Rural Zone	GRUZ-P4	Support	Supportive of recognising the benefits of conservation, pest management, riparian planting and fencing in the Rural Environment.	Retain GRUZ-P4 as drafted.
Sarah and Peter Barclay	S20.059	GRUZ - General Rural Zone	GRUZ-P5	Support	Supportive of GRUZ-P5.	Retain GRUZ-P5 as drafted.
Sarah and Peter Barclay	S20.060	GRUZ - General Rural Zone	GRUZ-P6	Support	Supportive of GRUZ-P6.	Retain GRUZ-P6 as drafted.
Sarah and Peter Barclay	S20.061	GRUZ - General Rural Zone	GRUZ-P7	Amend	Supportive of enabling agriculture aviation activities.	Amend GRUZ-P7 as follows: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities, whilst avoiding, remedying or mitigating any adverse ~~managing the noise-effects through controlling the location of airstrips and scale of their use.~~
Sarah and Peter Barclay	S20.062	GRUZ - General Rural Zone	GRUZ-P8	Support	Supportive of recognising that residential activity is required in the rural zone to support primary production.	Retain GRUZ-P8 as drafted.
Sarah and Peter Barclay	S20.063	GRUZ - General Rural Zone	GRUZ-P10	Amend	Supportive of the implement the NPSHPL, however GRUZ-P10 as worded is not consistent with the objective and policies of the NPSHPL.	Amend GRUZ-P10 to align with the wording of the NPSHPL.

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Sarah and Peter Barclay	S20.064	GRUZ - General Rural Zone	GRUZ-P11	Support	Supportive of GRUZ-P11.	Retain GRUZ-P11.
Sarah and Peter Barclay	S20.065	GRUZ - General Rural Zone	GRUZ - General	Oppose	It is unclear how Rules and Standards interact and there is no guidance clarifying the applicability of standards. Having an activity status in the standard implies that the standard is a standalone rule. It is also unclear if the standards apply to activities requiring resource consent or only permitted activities.	Amend table headings from "Standards" to "Standards for Permitted Activities". Insert a guidance note clarifying whether Standards are applicable to all activities or only those listed within the relevant Rule. Clarify the relationship between rules and standards and whether standards are to be treated as standalone rules.
Sarah and Peter Barclay	S20.066	GRUZ - General Rural Zone	GRUZ-R1	Amend	Supportive of a permitted activity rule for primary production activities but questions the need to apply the new standards to 'activities' and existing buildings/structures.	Amend GRUZ-R1 as follows: Primary Production (including Intensive Indoor Primary Production) Activity Status: Permitted Where: 1. Any new ~~or extended~~ building, or structure (excluding fences and farm infrastructure) ~~and activity~~ complies with General Rural Zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8. No other GRUZ standards apply. Except that: (a) This rule does not apply to Quarrying and Mining, as those activities are subjects to Rules GRUZ-R2 and GRUZ-R3. (b) This rule does not apply to Plantation Forestry in an ONL, ONF or SNA, which is subject to District Plan rules NFL-R8 and ECO-R1
Sarah and Peter Barclay	S20.067	GRUZ - General Rural Zone	GRUZ-R3	Oppose	Farm quarries are considered to be a supporting activity under the NPS HPL and therefore should not be restricted on Highly Productive Land.	Amend GRUZ-R3 as follows: Quarrying Activities Activity status: PermittedAll areas excluding ONLs. ... 3. The activity is not located on Highly Productive Land, unless it is a farm quarry; and 4. The area is progressively stabilised, filled or recontoured; and 5. Any new building or structure relating to the quarrying activity ~~and activity~~ complies with General Rural Zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8, and Earthworksstandards EW-S3, EW-S5 and EW-S7. No other Standards apply. Activity status where compliance is not achieved:Restricted DiscretionaryMatters of discretion: 1. Location and scale of the activity ... 12. The need for the activity to support primary production.
Sarah and Peter Barclay	S20.068	GRUZ - General Rural Zone	GRUZ-R5	Support	Supportive of permitted activity status for the establishment of woodlots.	Retain GRUZ-R5 as drafted.
Sarah and Peter Barclay	S20.069	GRUZ - General Rural Zone	GRUZ-R6	Support	Supportive of a permitted activity status for conservation activities.	Retain GRUZ-R6 as drafted.
Sarah and Peter Barclay	S20.070	GRUZ - General Rural Zone	GRUZ-R7	Amend	Supportive of permitted status for residential activities with minor amendments.	Amend GRUZ-R7 to read: Residential ActivityAll areas Activity status: Permitted Where: 1. For new residential units and new minor residential units, standard GRUZ-S1 Density is met; and 2. Any new building, ~~addition~~ , or ~~external~~ alteration that increases the number of habitable rooms ~~and activity~~ complies with zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6 and GRUZ-S7; and 3. For minor residential units, the maximum floor area shall be 80m2; and 4. The residential unit is connected to telecommunications services (whether hardwired or

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						wireless). Activity status where compliance is not achieved with: GRUZ-R7(1): as per GRUZ-S1 activity status and matters of discretion. ~~GRUZ-R7(3):~~ (2): Restricted Discretionary Matters of Discretion: 1. The matters of discretion of any infringed standard. GRUZ-R7(3): ~~Non-Complying~~ Discretionary GRUZ-R7(4): Restricted Discretionary Matters of Discretion: 1. Whether any form of telecommunication is available at the location the proposed residential unit 2. The functional need to having a residential unit in a location without access to telecommunication and whether there are suitable alternative locations for a residential unit on site.
Sarah and Peter Barclay	S20.071	GRUZ - General Rural Zone	GRUZ-R9	Support	Supportive of a permitted activity rule for rural commercial activities.	Retain GRUZ-R9 as drafted.
Sarah and Peter Barclay	S20.072	GRUZ - General Rural Zone	GRUZ-R11	Support	Supportive of a permitted activity status for homestay activities.	Retain GRUZ-R11 as drafted.
Sarah and Peter Barclay	S20.073	GRUZ - General Rural Zone	GRUZ-R13	Support	Supportive of a permitted activity status for rural commercial recreation activities.	Retain GRUZ-R13 as drafted.
Sarah and Peter Barclay	S20.074	GRUZ - General Rural Zone	GRUZ-R16	Support	Supportive of a permitted activity status for agricultural aviation activities.	Retain GRUZ-R16 as drafted.
Sarah and Peter Barclay	S20.075	GRUZ - General Rural Zone	GRUZ-R17	Amend	The rule table does not provide an activity status for Visitor Accommodation. It appears as though it is incorrectly referenced as GRUZ-R18, which is a discretionary activity.	Provide a correct activity status reference for GRUZ-R17.
Sarah and Peter Barclay	S20.076	GRUZ - General Rural Zone	GRUZ-R20	Oppose	Non-complying status for activities that are not otherwise provided for is extremely stringent.	Amend GRUZ-R20 to read: All other activities Activity Status: ~~Non-complying~~ Permitted 1. Any activities, including associated buildings, not otherwise provided for in the list of rules that comply with all General Rural Zone standards. Activity Status where compliance is not achieved: ~~N/A~~ Discretionary
Sarah and Peter Barclay	S20.077	GRUZ - General Rural Zone	GRUZ-S1	Oppose	The standard as worded is unclear as to whether a minor residential unit is allowed in addition to a residential unit.	Amend GRUZ-S1 as follows: Density 1. There shall be no more than one residential unit (not including minor residential units) per 40 hectares; and 2. For sites under 40 hectare, no more than one residential unit (not including minor residential units) per site; and 3. There shall be a maximum density of one minor residential unit per site
Sarah and Peter Barclay	S20.078	GRUZ - General Rural Zone	GRUZ-S3	Oppose	The matters of discretion do not recognise that supporting activities (as defined by the NPSHPL) may need to be located on Highly Productive Land.	Amend GRUZ-S3 to read: ... Restricted Discretionary Matters of discretion: 1. The adverse effects on the rural character. 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and sense of openness. 3. The adverse effects on Ngāi Tahu cultural values including those listed in MW-2.3. 4. Whether the building is located on high class soils and whether it is for a supporting activity. 5. The reason for the additional building size.

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						6. Noise and odour from housing animals
Sarah and Peter Barclay	S20.079	GRUZ - General Rural Zone	GRUZ-S4	Oppose	Reduced setback distances are sought for primary production buildings over 500 m2. The matters of discretion also do not anticipate two or more adjoining sites (legal parcels) that make up a single farm.	Amend GRUZ-S4 as follows: Setback to Side and Rear Boundaries All Areas Any building is setback from any side or rear boundary the minimum distances as follows: 1. Residential buildings are setback 30m; 2. Dairy sheds and buildings that house animals are setback 50m; 3. Buildings greater than 500 square metres are setback ~~200m~~ 50m , except for in the Rural Industry Precinct (PREC13) where the setback is 100m; 4. Buildings less than 10 square metres are setback 2m; and/or 5. All other buildings are setback 15m. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The adverse effects on rural character 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and sense of openness 3. The extent to which buildings are set back on the adjoining sites and the use of the intervening space 4. The reasons for the reduced setback 5. Noise and odour from housing animals 6. Reverse Sensitivity effects 7. The ownership of the adjoining site and whether it forms part of the same farming operation.
Sarah and Peter Barclay	S20.080	GRUZ - General Rural Zone	GRUZ-S5	Amend	Generally supportive of setbacks to road boundaries, but seeks a reduced setback from Interregional Connector roads.	Amend GRUZ-S5 as follows: Setback to Road Boundaries All Areas Any building or structure is setback from any road boundary the minimum distances as follows: 1. Residential buildings are setback: (a) ~~100m~~ 50m from the boundary of an Interregional Connector road (state highway); (b) 40m from the boundary of a Rural Connector road; ... 5. All other buildings and structures, except fences and farm infrastructure [Refer proposed definition], are setback 15m. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: ...8. The functional or operational need for the building to be located within the road setback
Sarah and Peter Barclay	S20.081	GRUZ - General Rural Zone	GRUZ-S7	Oppose	An exclusion is sought for fences where required to exclude stock from waterbodies or to protect areas of riparian planting.	Amend GRUZ-S7 as follows: Setbacks from stream and river All activities Any building or structure (excluding fences for stock exclusion) is set back from the top of the closest bank of any stream or river the minimum distance as follows: (a) 20m for high order rivers or streams (order 5 and above) ... Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: ...8. Whether the activity will result in environmental benefits through the exclusion of stock.
Sarah and Peter Barclay	S20.082	GRUZ - General Rural Zone	GRUZ-S9	Oppose	The requirement for helicopter flight paths to be separated horizontally by at least 250m from any noise sensitive activity is	Amend GRUZ-S9 as follows: Rural Airstrips and Helicopter Landing Areas 1. Any rural airstrip or helicopter landing area is separated by at least 500m from any

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					unworkable as this does not account for any vertical separation.	notional boundary to a noise sensitive activity on a site not being serviced by the use of the rural airstrip or helicopter landing area.; and 2. ~~The flight path to the helicopter landing area is not within a horizontal distance of 250m of any notional boundary to a noise sensitive activity.~~
Sarah and Peter Barclay	S20.083	Interpretation	agricultural aviation activity	Support	Supportive of this definition.	Retain 'agricultural aviation activity' defintion as drafted.
Sarah and Peter Barclay	S20.084	Interpretation	agricultural, horticultural and pastoral activities	Amend	Farm quarries should be included within the definition of agricultural, horticultural and pastoral activities.	Amend the definition for agricultural, horticultural and pastoral activities to read:Means the use of land and / or buildings which are used for producing livestock, crops and other agricultural produce that is reliant on the soil resource of the land and includes storage of equipment and machinery associated with the activity but excludes any processing, quarrying (except farm quarries) or direct sales.
Sarah and Peter Barclay	S20.085	Interpretation	conservation activity	Support	Supportive of this definition.	Retain 'conservation activities' defiinition as drafted.
Sarah and Peter Barclay	S20.086	Interpretation	cultivation	Support	Supports the alignment of definitions with the National Planning Standards.	Retain 'cultivation' defintion as drafted.
Sarah and Peter Barclay	S20.087	Interpretation	dead holes	Support	Supports this definition.	Retain 'dead holes' definition as drafted.
Sarah and Peter Barclay	S20.088	Interpretation	earthworks	Support	Supports this definition.	Retain 'earthworks' definition as drafted.
Sarah and Peter Barclay	S20.089	Interpretation	farm quarry	Support	Supportive of this definition.	Retain 'farm quarry' definition as notified.
Sarah and Peter Barclay	S20.090	Interpretation	farm track	Amend	Supportive of the definition but wishes to de-couple the definition from 'vehicle access' as farm tracks do not provide vehicle access to legal roads.	Amend the definition for farm track to read: Means ~~vehicle access~~ tracks for the movement of vehicles and/or stock associated with agriculture, pastoral and horticultural activities.
Sarah and Peter Barclay	S20.091	Interpretation	fences	Oppose	It is unclear why post and wire fences have been excluded from this definition as they are specifically referenced within the Rules.	Amend the definition for fences to read: Means any structure, intended to be a permanent division, screen or barrier, but shall not include a ~~post and wire fence~~ or a temporary fence such as an electric fence or construction hoarding.
Sarah and Peter Barclay	S20.092	Interpretation	helicopter Landing Area	Amend	Should be clear that areas used temporarily for helicopter landing areas are also included.	Amend the definition for helicopter landing areas to read: Any area of land, building or structure outside of the Airport Zone intended or designed to be used (including temporarily) , whether wholly or partly, for helicopter movement or servicing, including heliports and helipads
Sarah and Peter Barclay	S20.093	Interpretation	highly productive land	Amend	Supportive of the alignment of wording used in higher order documents but the definition references clauses of the NPSHPL that may cause confusion for plan users.	Amend the definition for Highly Productive Land to read: Has the same meaning as the National Policy Statement for Highly Productive LandMeans land that has been mapped in accordance with clause 3.4 of the National Policy Statement for Highly Productive Land and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) of the National Policy Statement for Highly Productive Land for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)
Sarah and Peter Barclay	S20.094	Interpretation	improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'improved pasture' definition as drafted.
Sarah and Peter Barclay	S20.095	Interpretation	indigenous vegetation	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'indigenous vegetation' definition as drafted.
Sarah and Peter Barclay	S20.096	Interpretation	indigenous vegetation clearance	Oppose	This definition does not align with the definition for 'vegetation clearance' but should be defined in the same manner regardless of indigenous or exotic species.	Either:Amend the definition for indigenous vegetation clearance as follows: Means the ~~clearing or~~ removal of indigenous vegetation by vegetation clearance ~~any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, overplanting, burning or any other mechanical means as well as mob~~

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						~~stocking.~~ Or: Delete the definition of Indigenous Vegetation Clearance entirely
Sarah and Peter Barclay	S20.097	Interpretation	land disturbance	Support	Supportive of the definitions with National Planning Standards.	Retain 'land disturbance' definition as drafted.
Sarah and Peter Barclay	S20.098	Interpretation	LUC 1, 2 or 3	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'LUC 1, 2 or 3' as drafted.
Sarah and Peter Barclay	S20.099	Interpretation	mahinga kai	Amend	Details provided in the definition for Mahinga Kai would be more appropriate in the Mana Whenua chapter.	Amend the definition of mahinga kai to: Means the same as outlined in MW - 2.3.3.3 and is an all-inclusive term that refers to the ability to access resources for harvesting, the site where gathering of these resources occurs, the act of gathering and using the resource, and the good health of the resource. ~~As a result of this practical focus, mahinga kai is considered by Hokonui Rūnanga to be, in today's language, the principal 'environmental indicator' in natural systems. If mahinga kai is not present, or is unsafe to harvest, then that natural system is under stress and requires remedial action. Mahinga kai was and is central to the Ngāi Tahu and Hokonui way of life. The collection and processing of mahinga kai is an important social, cultural, environmental, and economic activity contributing to the overall well-being of Ngāi Tahu whānui. Mahinga kai practices rely on thriving and abundant biodiversity, safe and aesthetically pleasing places to practice, and the active transfer of knowledge between people. These attributes are dependent on the sustainable management of many other natural resources in the takiwā, especially waterbodies and the management of stormwater. Hokonui Rūnanga expect to be able to practice mahinga kai in our takiwā at multiple locations that are deliberately selected for the quality of the resource and its ability to sustain itself.~~ —
Sarah and Peter Barclay	S20.100	Interpretation	maintenance of improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'maintenance of improved pasture' definition as drafted.
Sarah and Peter Barclay	S20.101	Interpretation	primary production	Support	Supportive of the alignment with national planning standards.	Retain 'primary production' definition as drafted.
Sarah and Peter Barclay	S20.102	Interpretation	rural airstrip	Support	Supportive of this definition.	Retain 'rural airstrip' definition as notified.
Sarah and Peter Barclay	S20.103	Interpretation	rural commercial recreation activity	Support	Supportive of this definition.	Retain 'rural commercial recreation activity' definition as drafted.
Sarah and Peter Barclay	S20.104	Interpretation	rural environment	Support	Supportive of this definition.	Retain 'rural environment' definition as drafted.
Sarah and Peter Barclay	S20.105	Interpretation	rural industry	Support	Supportive of the alignment with national planning standards.	Retain 'rural industry' definition as drafted.
Sarah and Peter Barclay	S20.106	Interpretation	rural produce retail activity	Support	Supportive of this definition.	Retain 'rural produce retail activity' as drafted.
Sarah and Peter Barclay	S20.107	Interpretation	significant natural area (SNA)	Oppose	This definition does not accurately reflect the definition in the NPSIB and would include areas without following the correct process.	Amend the definition for significant natural area to reflect the NPSIB wording, as follows: Has the same meaning as per the National Policy Statement for Indigenous Biodiversity and means: ~~(a) Areas identified as SNA 1 (Waterfall Range) and SNA 2 Pukerau Red Tussock Reserve) on the planning maps until a suitably qualified ecologist engaged by Gore District Council determines that it is not an SNA~~ — ~~(b) any area that is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 4~~ ~~SNA also includes areas meeting the criteria outlined in Appendix 4 including those identified at resource consent stage or as part of a Farm Environment Plan assessment or as part of a Biodiversity Covenant.~~ — (a) any area that, after 4 August 2023, is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1 of the NPSIB; and (b) any area that, on 4

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						August 2023, is already identified in a policy statement or plan as an area of significant indigenous vegetation or significant habitat of indigenous fauna (regardless of how it is described); in which case it remains as an SNA unless or until a suitably qualified ecologist engaged by the relevant local authority determines that it is not an area of significant indigenous vegetation or significant habitat of indigenous fauna.
Sarah and Peter Barclay	S20.108	Interpretation	vegetation clearance	Oppose	Querying why grazing has been so limited in this definition as when managed should not constitute vegetation clearance. This definition is more restrictive than higher documents. Mob-stocking and over planting are technical terms and it is unclear exactly what these refer to as they are not in the PGDP definitions.	Amend the definition of vegetation clearance to read:- (a) the disturbance, damage, destruction, or removal of vegetation by any means (for example, by cutting, crushing, application of chemicals, or burning); and(b) includes activities that result in the disturbance, damage, destruction, or removal of vegetation (for example, ~~over-planting~~ , applying the seed of exotic pasture species, ~~mob-stocking~~ , or draining away water); but (c) does not include-- ... v) ~~the grazing of improved pasture within the relevant setback from a natural wetland~~
Sarah and Peter Barclay	S20.109	Interpretation	Definitions	Amend	Stoney Creek supports the inclusion of a definition for farm infrastructure to align with the amendments sought to ECO-R1, GRUZ-R1 and GRUZ-S5.	Insert a new definition for farm infrastructure: Means those structures (excluding buildings) reasonably necessary to enable primary production activities relating to irrigation, the provision of stock water, the storage and distribution of animal feed, stock yards and ramps, but excludes fences, farm tracks, feedlots and silage pits.
Sarah and Peter Barclay	S20.110	Interpretation	Definitions	Amend	Stoney Creek supports the inclusion of a definition for "supporting activity" as per the NPSHPL, to align with the amendments sought to GRUZ-R3 and GRUZ-S3.	Insert a new definition for supporting activity : Has the same meaning as per the National Policy Statement for Highly Productive Land and means: in relation to highly productive land, those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing).
Sarah and Peter Barclay	S20.111	Appendix 5 - NFL-APP - Landscape Values	APP5-NFL-APP	Oppose	Supportive of background information but concerns are raised that the extent, description and attributed values fail to recognise and misrepresent the current land use and values of the area. There is insufficient supporting documentation regarding the extent of the ONL area. Stoney Creek considers that the values listed to be protected are not present over much of the ONL area, which is working farmland and that the ONL area should be reduced. The description does not recognise the character and structures of the station which occupies 42 percent of the area and list qualities of naturalness and wilderness as values to be protected when over 70 percent of the area is a modified pastoral landscape. Pastoral farming can also provide benefits to landscape values through pest and weed management. Croydon Bush Scenic Reserve has distinctively different vegetation form the rest of the ONL, and exotic vegetation has not been listed as a potential threat. The description also does not recognise the historical and cultural values of the Croydon Area which is one of the earliest European settlements in Southland. The Southland Murihiku Regional Landscape Study (Boffa Miskell, 2019) which was relied upon in determining the ONL status should be made publicly available.	Amend Appendix 5 in a way that: • Accurately reflects the significant presence of pastoral farming within the ONL; • Recognises the benefits provided by pastoral farming in terms of maintaining a sense of openness, landscape legibility and pest control, within the ONL; • Recognises that the patterns and values of indigenous biodiversity vary significantly across the extent of the ONL and the highest value area is concentrated within the Croydon Bush SNA; • Corrects the statement that the ONL is free of structures; • Recognises the historical and cultural significance of the area to the rural community; and • Make available all documents referred to within Appendix 5, the s32 Report and the Landscape Assessment prepared by Mike Moore publicly available on the Gore District Council website.

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Sarah and Peter Barclay	S20.112	Natural environmental Values map layers	NFL-MAP-Hokonui Hills	Oppose	The spatial extent of the ONL as notified in the Planning Maps is fundamentally flawed. The mapping appears to be carried over from previous versions of the Plan without review or updates.	Amend the Hokonui Hills ONL boundaries to accurately reflect the area of Outstanding Natural Landscape values. Figure 10 of Appendix B [refer to original submission] provides a suggestion of the extent of the ONL area within Stoney Creek station which can be discussed further with the Council, including incorporating evidence provided by a landscape expert at the hearing stage.
Sarah and Peter Barclay	S20.113	Maps	MAP-Additional provisions sought	Amend	Stoney Creek's preferred relief relies upon the establishment of a new precinct to be called the Hokonui Hills Special precinct where rural activities associated with pastoral farming are permitted with appropriate limites to protect the Hokonui Hills.	Insert a new map layer to be called the Hokonui Hills Special Precinct.Replace the underlying zoning of this area (General Rural) with the special precinct zoning.
Sarah and Peter Barclay	S20.114	GRUZ - General Rural Zone	GRUZ-P9	Support	Stoney Creek supports a policy providing for activities with a genuine link with rural land and primary production.	Retain GRUZ-P9 as drafted.
Sarah and Peter Barclay	S20.115	Interpretation	silage pit	Oppose	This definition is broad and could be taken to include areas for the storage of hay or grain within a silo/container, or small scale storage of bagged feed. Alignment with the definition as per the Proposed Southland Land and Water plan is suggested.	Amend the definition of silage pit as follows: ~~Means an area constructed and used for the purpose of fermentation and storage for animal feed.~~ land or structures on which silage (plant material harvested while green for fodder and kept succulent by partial fermentation, but does not include baleage or hay) is stored, processed or directly utilised, excluding the storage of bales of plant material completely encapsulated in plastic.
Sarah and Peter Barclay	S20.116	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Sarah and Peter Barclay	S20.117	NFL - Natural Features and Landscapes	NFL - General	Oppose	The mapped extent of Hokonui Hills ONL extends beyond the area of outstanding natural values and there is no justification provided for the extent. No evidence provided to suggest that the level of protection provided by the Operative Gore District Plan was insufficient.	Modified pastoral landscape should not be mapped as ONL Reduce restrictions relating to the Hokonui Hills ONL overlay
Sarah and Peter Barclay	S20.118	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Oppose	The provisions were developed in a matter of months after the commencement of the NPSIB which left little space for consultation outside of the formal notification process. A plan change will be necessary to amend rules and map Significant Natural Areas. Blanket protections proposed in the Ecosystems	Withdraw chapter

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					and Indigenous Biodiversity chapter provide little to no ability for essential pastoral farming practices such as fencing and the construction or maintenance of farm tracks to be undertaken without resource consent. The immediate legal effect of the rules within the Ecosystems and Indigenous Biodiversity chapter significantly hinders the ability of Stoney Creek Station (and farmers in general) to effectively manage vegetation on their properties.	
Sarah and Peter Barclay	S20.119	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Silver Fern Farms	S40.001	Introduction	Introduction - general	Support	The chapter provides an appropriately concise overview of the Gore District and the purpose of the Proposed Plan.	Retain as notified
Silver Fern Farms	S40.002	How the Plan works	How the plan works - general	Support	The chapter provides an appropriate overview of the Proposed Plan's statutory context and the structure of, and methods used in, the Proposed Plan.	Retain as notified
Silver Fern Farms	S40.003	Interpretation	Definitions nesting tables	Support	Nesting tables are helpful to assist Plan users to understand the scope of rules. Council may wish to include a description of how to use the nesting tables in the "How The Plan Works" chapter as well as in this chapter.	Retain as notified
Silver Fern Farms	S40.004	Interpretation	artificial outdoor lighting	Oppose	The reference to signs needs deletion, or improved precision. Otherwise, all signs, illuminated or not, will be subject to this term, and unforeseen outcomes may arise. Illuminated signs will be captured by the reference to "Any" exterior lighting.	Amend as follows: artificial outdoor lighting Any exterior or non-residential interior lighting that emits directly into the outdoor environment ~~and includes signs.~~
Silver Fern Farms	S40.005	Interpretation	hazardous substance	Support	Alignment with the RMA definition is appropriate.	Retain as notified
Silver Fern Farms	S40.006	Interpretation	industrial activity	Support	Alignment with the National Planning Standards 2019 is appropriate.	Retain as notified
Silver Fern Farms	S40.007	Interpretation	industrial and trade waste	Support	Alignment with the National Planning Standards 2019 is appropriate.	Retain as notified
Silver Fern Farms	S40.008	Interpretation	noise sensitive activity	Support	The definition appropriately captures noise sensitive activities and provides appropriate exclusions under clauses (a) and (b).	Retain as notified

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Silver Fern Farms	S40.009	Interpretation	notional boundary	Support	Alignment with the National Planning Standards 2019 is appropriate.	Retain as notified
Silver Fern Farms	S40.010	Interpretation	residential activity	Support	Alignment with the National Planning Standards 2019 is appropriate.	Retain as notified
Silver Fern Farms	S40.011	Interpretation	reverse sensitivity	Support	The definition appropriately captures the scope of activities that may be vulnerable to reverse sensitivity effects (approved, existing and permitted activities), and the nature of the effect (compromised, constrained or curtailed operations).	Retain as notified
Silver Fern Farms	S40.012	Interpretation	rural industry	Oppose	The National Planning Standards do not define the term "rural environment"; This definition incorporates (indicated by the italicised text) a definition of "rural environment" which is as follows: "Rural environment Means land within the General Rural Zone, Rural Lifestyle Zone, Settlement Zone and Natural Open Space Zone". The upshot is that the National Planning Standards contemplate "rural industry" in any zone. This proposed definition confines the activity further than the National Planning Standards definition does, as it would require that "rural industry" can only occur in the four zones that are specified as comprising the "rural environment". Therefore, it is not correct to say that the term is defined as per the National Planning Standards.	Amend to distinguish the reference to "rural environment" sufficiently to comply with the definition prescribed in the National Planning Standards.
Silver Fern Farms	S40.013	Interpretation	sensitive activity	Oppose	Seeks that "seasonal workers accommodation" be recognised and provided for in the Proposed Plan. The definition of "sensitive activity" needs amending to except "seasonal workers accommodation". If not, it will complicate the consenting of workers accommodation located on the same site as the principal activity. Other amendments are also appropriate, because it is redundant to refer under (b) and (c) to sub-categories of the overarching activity. The Definitions Nesting Tables, and the definitions of "educational facility" and "residential activity" clearly state the activity sub-categories included in the principal activity definitions.	Amend as follows: Sensitive activity means any: (a) health care centre or hospital. (b) educational facility, ~~including school, early childhood facility, play centre.~~ (c) residential activity, ~~in~~ excluding retirement village and supported residential seasonal workers accommodation. (d) visitor accommodation. (e) places of worship. (f) marae or Papatipu Rūnanga complex.
Silver Fern Farms	S40.014	Interpretation	significant hazardous facility	Oppose	The term "freezing works" is outdated. Silver Fern Farms requests that this be amended to "meat processing" and any consequential amendments be made.	Amend as follows [entire provision not shown here]: j. ~~Freezing works~~ Meat processing and rendering plants.
Silver Fern Farms	S40.015	Interpretation	Definitions	Support	Without a definition, this accommodation would be treated as "residential activity" and defined as a "sensitive activity" and as a "noise sensitive activity". That definitional approach would be difficult to administer efficiently because "residential activity" is discouraged in rural and	Insert the following definition: Seasonal workers accommodation Means any premises used for residential accommodation purposes directly associated with the seasonal labour requirements of the District's agriculture, horticulture, viticulture, and cropping industries, including both existing permanent buildings and new relocatable structures. Seasonal workers accommodation includes ancillary kitchen, dining and ablution facilities and other ancillary living and recreation facilities for the exclusive use of

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					industrial zones due to potential reverse sensitivity effects (per issue 4, p. 25 of the "Industrial" s32 report).The upshot would be that if not defined and provided for, seasonal workers accommodation would attract a discretionary activity status under Rule GRUZ-R18 (in the General Rural Zone) or a non-complying status under Rule GIZ-R9 (in the General Industrial Zone). Timaru and Central Hawks Bay DP prepared under the NPS define seasonal workers accommodation.	resident seasonal workers, whether in one building or multiple buildings.
Silver Fern Farms	S40.016	UFD - Urban form and development	UFD-O1	Support	Silver Fern Farms agrees with strategic policy recognition of the need to manage interfaces between incompatible activities and zones at (9). This is particularly relevant in the context of the District's urban growth, described in the chapter 'Overview'.	Retain as notified
Silver Fern Farms	S40.017	UFD - Urban form and development	UFD-O8	Support	Provides helpful recognition about the strategic importance of the Airport, major facilities and large-scale industrial activities to inform the design of zones/other controls applicable to those significant land uses/sites.	Retain as notified
Silver Fern Farms	S40.018	UFD - Urban form and development	UFD-O9	Support	This objective promotes appropriate strategic outcomes for industrial activities in terms of land supply, location and operation.	Retain as notified
Silver Fern Farms	S40.019	HAZS - Hazardous Substances	HAZS-Overview	Support	Silver Fern Farms agrees with the approach, outlined in this section and at pp. 14-15 of the s32 report, of confining these provisions to: matters not already covered by other legislation; and the management of proposed activities near significant hazardous facilities.	Retain as notified
Silver Fern Farms	S40.020	HAZS - Hazardous Substances	HAZS-O1	Support	This objective seeks to prevent "significant" adverse effects, and appropriately retains flexibility to apply management measures to other adverse effects that are not "significant".	Retain as notified
Silver Fern Farms	S40.021	HAZS - Hazardous Substances	HAZS-O2	Support	Agree with the s32 analysis, including the identification of reverse sensitivity issues under the "Issue 2" sub-heading.	Retain as notified
Silver Fern Farms	S40.022	HAZS - Hazardous Substances	HAZS-P1	Oppose	Amendments are suggested to: Clarify the zoning/precinct that engages this policy. Enable the consideration of other management measures where complete avoidance of adverse effects on cultural values cannot be achieved. This reflects the chapeau's direction to "manage", not "avoid, adverse effects. Clarify that existing significant hazardous facilities are not required to be relocated out of the Maitara River Floodway and mapped district inundation areas (the latter layer applies to Silver Fern Farms' site).	Amend as follows: Manage adverse effects from new significant hazardous facilities locating in the General Industrial Zone ~~or~~ Rural Industry Precinct by: 2. locating significant hazardous facilities outside of, and setback from, sensitive environments and avoiding or mitigating adverse effects on Ngāi Tahu cultural values; 3. locating new significant hazardous facilities outside the Maitara River Floodway and all mapped district inundation areas to avoid the effects of natural hazards and protect the environment; and
Silver Fern Farms	S40.023	HAZS - Hazardous Substances	HAZS-P2	Oppose	When read in conjunction with HAZS-P1 the drafting is not entirely clear that HAZSP2 does not apply to the General Industrial Zone or	Amend as follows: Avoid adverse effects from new significant hazardous facilities locating outside the General Industrial Zone or Rural Industry Precinct by:

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					the Rural Industry Precinct, where HAZS-P1 applies. Minor amendment could clearly distinguish the two. This is appropriate, to ensure the different effects management directions in each policy (HAZS-P1 requires effects management, whereas HAZS-P2 requires effects avoidance) are applied correctly.	
Silver Fern Farms	S40.024	HAZS - Hazardous Substances	HAZS-P3	Support	An enabling framework for activities that do not increase risk is an efficient and appropriate way to administer these provisions. It is important to ensure, through this policy and HAZS-R1, that activities unrelated to hazardous substance use, storage or disposal etc are not made subject to resource consent requirements simply because the activity is at a site that contains a significant hazardous facility.	Retain as notified
Silver Fern Farms	S40.025	HAZS - Hazardous Substances	HAZS-P4	Support	Supports the directive wording of this policy as a means to discourage conflict between new sensitive activities and existing significant hazardous facilities.	Retain as notified
Silver Fern Farms	S40.026	HAZS - Hazardous Substances	HAZS-R1	Support	supports the differential (permitted and discretionary) activity statues for extensions or upgrades in the General Industrial Zone, under HAZS-R1(1) and (2).	Retain as notified
Silver Fern Farms	S40.027	HAZS - Hazardous Substances	HAZS-R2	Support	agrees with the approach set out in the Hazardous Substances s32 report of using differential activity statuses between the General Industrial Zone and other zones to signal a preference for significant hazardous facilities to locate in the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.028	HAZS - Hazardous Substances	HAZS-R3	Support	Agrees with the 250 m setback under sub-clause (1). Silver Fern Farms sets out relief it seeks in respect of an exception for "seasonal workers accommodation" ancillary to a significant hazardous facility in separate submission points on: The definition of "sensitive activity"; and A proposed new definition of "seasonal workers accommodation".	Retain as notified
Silver Fern Farms	S40.029	CL - Contaminated Land	CL-Overview	Support	Adequately sets out the context for the Contaminated Land chapter.	Retain as notified
Silver Fern Farms	S40.030	CL - Contaminated Land	CL-O1	Support	The objective states an outcome that is well-aligned with the Council's role in implementing the NESCS through resource consent processes.	Retain as notified
Silver Fern Farms	S40.031	CL - Contaminated Land	CL-P1	Support	It is appropriate to identify contaminated sites, as the Proposed Plan does, through the "for information only" mapping layer relating to contaminated sites.	Retain as notified
Silver Fern Farms	S40.032	CL - Contaminated Land	CL-P2	Support	It is appropriate to provide flexibility to manage potential risks in a differential manner that corresponds to the site context and	Retain as notified

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					the risks inherent to the intended use or development.	
Silver Fern Farms	S40.033	CL - Contaminated Land	CL-P3	Support	CL-P3 provides appropriate policy direction to guide the determination of applications under the NESCS.	Retain as notified
Silver Fern Farms	S40.034	CL - Contaminated Land	CL - General	Support	With regards to "Rules" section- It is appropriate to defer to the NESCS for the contamination-specific assessment of proposals on contaminated sites.	Retain as notified
Silver Fern Farms	S40.035	NH - Natural Hazards	NH-Overview	Support	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.	Retain as notified
Silver Fern Farms	S40.036	NH - Natural Hazards	NH-O1	Support	supports a flexible effects management approach towards natural hazard risks, which can be tailored to the risk profile of specific sites/proposals.	Retain as notified
Silver Fern Farms	S40.037	NH - Natural Hazards	NH-P2	Support	The policy provides appropriate framework for the consideration of proposals located on land that is at risk of flooding.	Retain as notified
Silver Fern Farms	S40.038	NH - Natural Hazards	NH-P5	Support	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.	Retain as notified
Silver Fern Farms	S40.039	NH - Natural Hazards	NH-R2	Support	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.	Retain as notified
Silver Fern Farms	S40.040	SUB - Subdivision	SUB-P5	Oppose	This policy appears to slightly misapply the concept of "reverse sensitivity" in referring to effects "...from adjacent land uses, railway lines and States [sic] Highways". Reverse sensitivity effects are effects "on" - not "from" - existing activities. This is described by the definition of "reverse sensitivity" in the Proposed Plan and as per the drafting of rules in this chapter, like SUB-R5(14).	Amend as follows: Ensure reverse sensitivity effects from subdivision are avoided or managed, including from on adjacent land uses, railway lines, and States Highways.
Silver Fern Farms	S40.041	SUB - Subdivision	SUB-P19	Support	The proposed introduction of the RLZ in the area north/west of the Silver Fern Farms' site may facilitate lifestyle subdivision in the future. It is therefore appropriate that SUB-P19 be retained as notified to require consideration of reverse sensitivity effects at the time of subdivision.	Retain as notified
Silver Fern Farms	S40.042	SUB - Subdivision	SUB-R5	Support	This rule would apply to the subdivision of land in the proposed RLZ to the northwest of Silver Fern Farms's site. As such, Silver Fern	Retain as notified

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					Farms supports the inclusion of a specific assessment matter regarding reverse sensitivity effects.	
Silver Fern Farms	S40.043	SUB - Subdivision	SUB-R6	Support	Rule applies to subdivision of land is proposed Gore South Industrial Development Area which includes the Silver Fern Farms Site. Supports the inclusion of a specific assessment matter regarding reverse sensitivity effects. It will be critical to the success of the proposed Gore South Industrial Development Area to ensure that the consenting of subdivisions minimises the risk of subsequent reverse sensitivity effects.	Retain as notified
Silver Fern Farms	S40.044	EW - Earthworks	EW-O1	Support	It is appropriate to facilitate earthworks for development while "minimizing" adverse effects and protecting the specified values.	Retain as notified
Silver Fern Farms	S40.045	EW - Earthworks	EW-P3	Support	The provision for a limited amount of earthwork in flood prone areas as a permitted activity is appropriate for efficiency.	Retain as notified
Silver Fern Farms	S40.046	EW - Earthworks	EW-R13	Support	The consenting framework for earthworks in the mapped Actual or Potential Inundation Area appropriately distinguishes (by way of activity status) between the varying environmental risk presented by different consenting scenarios.	Retain as notified
Silver Fern Farms	S40.047	EW - Earthworks	EW-R14	Support	supports the consenting framework for earthworks in the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.048	LIGHT - Light	LIGHT-O1	Support	It is appropriate to provide for artificial outdoor lighting for operational and functional purposes	Retain as notified
Silver Fern Farms	S40.049	LIGHT - Light	LIGHT-P1	Support	Silver Fern Farms agrees it is appropriate to provide for artificial lighting where there is a functional and operational need.	Retain as notified
Silver Fern Farms	S40.050	LIGHT - Light	LIGHT-R1	Support	Silver Fern Farms supports the proposed consenting framework for emissions of artificial light in the General Industrial Zone	Retain as notified
Silver Fern Farms	S40.051	LIGHT - Light	LIGHT-S1	Support	Supports provision- specifically: proposed 15 Lux standard and inclusion of a matter of discretion.	Retain as notified
Silver Fern Farms	S40.052	NOISE - Noise	NOISE-Overview	Support	The "Overview" section adequately outlines the context of this chapter. Reference to controlling the potential for reverse sensitivity effects is supported.	Retain as notified
Silver Fern Farms	S40.053	NOISE - Noise	NOISE-O1	Support	Agrees with the recognition given to noise generating activities provided by this objective.	Retain as notified
Silver Fern Farms	S40.054	NOISE - Noise	NOISE-O2	Support	Silver Fern Farms agrees with the recognition of unreasonable noise effects provided by this objective.	Retain as notified
Silver Fern Farms	S40.055	NOISE - Noise	NOISE-O3	Support	Silver Fern Farms agrees with the recognition of the potential for reverse sensitivity effects provided by this objective.	Retain as notified
Silver Fern Farms	S40.056	NOISE - Noise	NOISE-P1	Support	It is appropriate to recognise that noise levels will vary between different zones.	Retain as notified
Silver Fern Farms	S40.057	NOISE - Noise	NOISE-P3	Support	It is appropriate to contemplate acoustic treatments to address potential reverse	Retain as notified

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					sensitivity effects in the locations identified in this policy.	
Silver Fern Farms	S40.058	NOISE - Noise	NOISE-R7	Support	Supports the consenting framework for noise sensitive activities in a General Industrial Zone as set out in NOISE-R7, particularly the discretionary consenting pathway for activities that do not provide adequate noise attenuation in habitable rooms.	Retain as notified
Silver Fern Farms	S40.059	NOISE - Noise	NOISE-S1	Support	Silver Fern Farms supports the consenting framework for noise generated in a General Industrial Zone as set out in NOISE-S1(7). The amenity expectations of the General Industrial Zone necessarily differ to those of other zones. Therefore, a restricted discretionary consenting pathway for activities that do not comply with the permitted noise limits is an appropriate approach.	Retain as notified
Silver Fern Farms	S40.060	NOISE - Noise	NOISE-S2	Support	The prescribed maximum noise levels at a notional boundary are supported. Consistent with other district plans	Retain as notified
Silver Fern Farms	S40.061	NOISE - Noise	NOISE-S3	Support	Supported and consistent with other Districts	Retain as notified
Silver Fern Farms	S40.062	GIZ - General Industrial Zone	GIZ-Overview and Purpose	Support	Appropriately sets the context of the zone and correlates to objectives UFD-O8 and UFD-O9. The description in paragraphs 2 - 4 regarding the management of reverse sensitivity effects and the amenity anticipated in the General Industrial Zone is supported.	Reatain as notified
Silver Fern Farms	S40.063	GIZ - General Industrial Zone	GIZ-Overview and Purpose	Support	Inclusion of development area section is supported, as it alerts Plan users considering the General Industrial Zone to the relevance of the Development Area chapter for the GIZ area south of Gore.	Retain as notified
Silver Fern Farms	S40.064	GIZ - General Industrial Zone	GIZ-O1	Support	This objective appropriately recognizes the contribution of industry to community wellbeing.	Retain as notified
Silver Fern Farms	S40.065	GIZ - General Industrial Zone	GIZ-O2	Support	It is fundamental to the purpose and objectives that incompatible activities be prevented from locating in the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.066	GIZ - General Industrial Zone	GIZ-O3	Support	The objective appropriately recognises that the level of amenity value appropriate to reflect the purpose and function of the General Industrial Zone differs to that of other zones.	Retain as notified
Silver Fern Farms	S40.067	GIZ - General Industrial Zone	GIZ-O4	Support	The management of adverse effects on Ngāi Tahu cultural values is appropriate. It is supported in the context of the General Industrial Zone providing a location for activities with adverse effects that are inappropriate to locate elsewhere.	Retain as notified
Silver Fern Farms	S40.068	GIZ - General Industrial Zone	GIZ-P1	Support	It is critical to "enable" industrial activities and is appropriate to "enable" a limited range of non-industrial activities (subject to their	Retain as notified (but delete the typo after "which")

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					compatibility with the zone purpose) in the General Industrial Zone.	
Silver Fern Farms	S40.069	GIZ - General Industrial Zone	GIZ-P2	Support	It is appropriate to "provide for" (but not "enable" in the same manner as GIZ-P1) compatible activities in the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.070	GIZ - General Industrial Zone	GIZ-P3	Support	This policy appropriately implements GIZ-O1, GIZ-O2, UFD-O8 and UFD-O9 and its implementation in conjunction with GIZ-P4 will be key to the successful operation of the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.071	GIZ - General Industrial Zone	GIZ-P4	Support	This policy appropriately implements GIZ-O1, GIZ-O2, UFD-O8 and UFD-O9 and its implementation in conjunction with GIZ-P4 will be key to the successful operation of the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.072	GIZ - General Industrial Zone	GIZ-P5	Support	It is appropriate that the expectations for amenity in and on the boundaries of the General Industrial Zone are consistent with the zone's purpose.	Retain as notified
Silver Fern Farms	S40.073	GIZ - General Industrial Zone	GIZ-R1	Support	The rule framework is efficient. It is appropriate to permit industrial and related/compatible activities and to provide restricted discretionary and discretionary consenting pathways where the permitted activity performance standards are not met. A non-complying status for these activities would be inappropriate, given the purpose of the General Industrial Zone. An activity that is not itself a "significant hazardous facility" but is located on the same site as a "significant hazardous facility" would be permitted under these rules, subject to (1) "complies with the General Industrial Zone Standards except GIZ-S10". It is assumed that a permitted status is the intended outcome, given the focus in the Hazardous Substances chapter on disentangling extensions or upgrades to "significant hazardous facility" from consenting requirements in cases where the extension/upgrade does not change the risk profile of the facility (see HAZS-R1). The discretionary consenting status for a breach of GIZ-R1 to GIZ-R5(2) is supported.	Retain as notified
Silver Fern Farms	S40.074	GIZ - General Industrial Zone	GIZ-R2	Support	The rule framework is efficient. It is appropriate to permit industrial and related/compatible activities and to provide restricted discretionary and discretionary consenting pathways where the permitted activity performance standards are not met. A non-complying status for these activities would be inappropriate, given the purpose of the General Industrial Zone. An activity that is not itself a "significant hazardous facility" but is located on the	Retain as notified

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					same site as a "significant hazardous facility" would be permitted under these rules, subject to (1) "complies with the General Industrial Zone Standards except GIZ-S10". It is assumed that a permitted status is the intended outcome, given the focus in the Hazardous Substances chapter on disentangling extensions or upgrades to "significant hazardous facility" from consenting requirements in cases where the extension/upgrade does not change the risk profile of the facility (see HAZS-R1). The discretionary consenting status for a breach of GIZ-R1 to GIZ-R5(2) is supported.	
Silver Fern Farms	S40.075	GIZ - General Industrial Zone	GIZ-R3	Support	The rule framework is efficient. It is appropriate to permit industrial and related/compatible activities and to provide restricted discretionary and discretionary consenting pathways where the permitted activity performance standards are not met. A non-complying status for these activities would be inappropriate, given the purpose of the General Industrial Zone. An activity that is not itself a "significant hazardous facility" but is located on the same site as a "significant hazardous facility" would be permitted under these rules, subject to (1) "complies with the General Industrial Zone Standards except GIZ-S10". It is assumed that a permitted status is the intended outcome, given the focus in the Hazardous Substances chapter on disentangling extensions or upgrades to "significant hazardous facility" from consenting requirements in cases where the extension/upgrade does not change the risk profile of the facility (see HAZS-R1). The discretionary consenting status for a breach of GIZ-R1 to GIZ-R5(2) is supported.	Retain as notified
Silver Fern Farms	S40.076	GIZ - General Industrial Zone	GIZ-R4	Support	The rule framework is efficient. It is appropriate to permit industrial and related/compatible activities and to provide restricted discretionary and discretionary consenting pathways where the permitted activity performance standards are not met. A non-complying status for these activities would be inappropriate, given the purpose of the General Industrial Zone. An activity that is not itself a "significant hazardous facility" but is located on the same site as a "significant hazardous facility" would be permitted under these rules, subject to (1) "complies with the General Industrial Zone Standards except GIZ-S10". It is assumed that a permitted status is the intended outcome, given the focus in the Hazardous Substances chapter on disentangling	Retain as notified

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					extensions or upgrades to "significant hazardous facility" from consenting requirements in cases where the extension/upgrade does not change the risk profile of the facility (see HAZS-R1). The discretionary consenting status for a breach of GIZ-R1 to GIZ-R5(2) is supported.	
Silver Fern Farms	S40.077	GIZ - General Industrial Zone	GIZ-R5	Support	The rule framework is efficient. It is appropriate to permit industrial and related/compatible activities and to provide restricted discretionary and discretionary consenting pathways where the permitted activity performance standards are not met. A non-complying status for these activities would be inappropriate, given the purpose of the General Industrial Zone. An activity that is not itself a "significant hazardous facility" but is located on the same site as a "significant hazardous facility" would be permitted under these rules, subject to (1) "complies with the General Industrial Zone Standards except GIZ-S10". It is assumed that a permitted status is the intended outcome, given the focus in the Hazardous Substances chapter on disentangling extensions or upgrades to "significant hazardous facility" from consenting requirements in cases where the extension/upgrade does not change the risk profile of the facility (see HAZS-R1). The discretionary consenting status for a breach of GIZ-R1 to GIZ-R5(2) is supported.	Retain as notified
Silver Fern Farms	S40.078	GIZ - General Industrial Zone	GIZ-R6	Support	The rule provides an appropriate management framework for retail activities.	Retain as notified
Silver Fern Farms	S40.079	GIZ - General Industrial Zone	GIZ-R7	Support	The rule provides an appropriate management framework for food and beverage activities.	Retain as notified
Silver Fern Farms	S40.080	GIZ - General Industrial Zone	GIZ-R8	Support	The rule provides an appropriate management framework for offices.	Retain as notified
Silver Fern Farms	S40.081	GIZ - General Industrial Zone	GIZ-R9	Support	The rule provides a suitable exception for caretaker dwellings and otherwise applies an appropriately restrictive (non-complying) management framework for residential activities.	Retain as notified
Silver Fern Farms	S40.082	GIZ - General Industrial Zone	GIZ-R12	Support	It is appropriate to restrict encroachment by non-industrial activities into the GIZ by way of a non-complying activity status.	Retain as notified
Silver Fern Farms	S40.083	GIZ - General Industrial Zone	GIZ-Additional provisions sought	Support	Silver Fern Farms seeks a consenting pathway for "seasonal workers accommodation" in the General Industrial Zone. Refer to full submission for reasons	Insert new rule follows: GIZ-RXX Seasonal workers accommodation Activity status: Discretionary Activity status where compliance not achieved: N/A
Silver Fern Farms	S40.084	GIZ - General Industrial Zone	GIZ-S1	Support	The 15 m permitted height allowance, with a restricted discretionary status for higher structures, is a reasonably consistent framework with what is provided in other district plans.	Retain as notified

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Silver Fern Farms	S40.085	GIZ - General Industrial Zone	GIZ-S4	Support	The 2 m setback requirement is appropriate to optimize the efficient use of land in the General Industrial Zone.	Retain as notified
Silver Fern Farms	S40.086	RLZ - Rural Lifestyle Zone	RLZ-O3	Oppose	"Existing" activities in adjacent zones can be adversely affected by the encroachment of rural living zones and activities, and should be protected in this objective, alongside "anticipated" activities.	Amend as follows: To enable rural lifestyle living opportunities whilst protecting existing and anticipated activities in adjacent zones from reverse sensitivity effects arising from, and impacting on, rural lifestyle activities.
Silver Fern Farms	S40.087	DEV - Development Areas	DEV1-Overview and Purpose	Support	Appropriate for the ODP to provide for road development to occur in a staged manner as the development area progresses. Also provides for flexibility to depart from the ODP. Note that the section of "secondary road connection" shown as bisecting Lot 3 DP 8038 is unlikely to be constructed in the life of the Proposed Plan. Silver Fern Farms seeks amendment of the ODP to remove the secondary road connection from its site. This will ensure that the ODP area can be developed without incorrect assumptions about the location of a road connection to Saleyard Road via Silver Fer Farms site. The matter is set out in a later submission point on the "DEV1-ODP Gore South Outline Development Plan" that is included in this chapter.	Retain as notified
Silver Fern Farms	S40.088	DEV - Development Areas	DEV1-O1	Oppose	To the extent that the indicative roading corridor shown on the ODP at Figure 7 of this chapter intersects Silver Fern Farms' site, Silver Fern Farms opposes the requirement under DEV-O1(2) to develop infrastructure "in accordance with" the ODP.	Amend the Gore South Outline Development Plan to delete the "secondary road connection" from Lot 3 DP 8038.
Silver Fern Farms	S40.089	DEV - Development Areas	DEV1-P1	Support	The flexibility for alternative design solutions is appropriate.	Retain as notified
Silver Fern Farms	S40.090	DEV - Development Areas	DEV1-P2	Oppose	Silver Fern Farms opposes the ODP's inclusion of a secondary road bisecting Lot 3 DP 8038. Consequently, it also opposes the direction for development in accordance with the ODP indicative road layout referenced under sub-clause (3) of this policy.	Amend the Gore South Outline Development Plan to delete the "secondary road connection" from Lot 3 DP 8038.
Silver Fern Farms	S40.091	DEV - Development Areas	DEV1-R1	Oppose	The upshot of DEV1-R1(3) is that Silver Fern Farms would require a discretionary resource consent for any development within the footprint of the indicative secondary road connection that the ODP shows traversing Lot 3 DP 8038. The meat processing plant at Silver Fern Farms' site represents a long term, substantial investment. It is unlikely to be abandoned or reconfigured in such a way that the secondary road connector can or should be constructed through Lot 3 DP 8038.	Amend the Gore South Outline Development Plan to delete the "secondary road connection" from Lot 3 DP 8038.
Silver Fern Farms	S40.092	DEV - Development Areas	DEV1-ODP	Oppose	The Gore South Outline Development Plan ("ODP") shows a "secondary road connection" bisecting Lot 3 DP 8038. Lot 3 is the northernmost parcel in Silver Fern Farms' landholding. Silver Fern Farms has no plans	Amend the Gore South Outline Development Plan to delete the "secondary road connection" from Lot 3 DP 8038.

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					to develop that part of its landholding in a manner that would require the road connection to be built as shown on the ODP. Regardless of Silver Fern Farms' development intentions, the secondary road connection could terminate at the northern boundary of Lot 3 DP 8038 (i.e., within neighbouring land at Lot 2 DP8038) without disadvantaging the industrial development on other land in the proposed Gore South Development Area. Deletion of the secondary road connection from Silver Fern Farms' site is appropriate to ensure that development expectations (yield, staging) for the ODP area are realistic. 30 Saleyard Road already has access to State Highway 1 via Saleyard Road and so would not be disadvantaged if the secondary road connection terminates north of Silver Fern Farms.	
Southland Developers Ltd.	S98.001	Zone map layers	LLRZ-MAP	Amend	The PDP LLR zoning over the subject site (52 and 60A Waimea Street) and adjoining properties represents an inefficient use of land which can be adequately serviced to accommodate General Residential zone densities and if enabled to be developed to a LLR allotment pattern will effectively lock in a future issue for future residential zoning whilst creating another isolated pocket of LLR amongst a wider residential zoning pattern. See complete submission for further	The LLRZ over 52 and 60A Waimea street and adjoining properties is replaced with a General Residential Zone
Southland Developers Ltd.	S98.002	Zone map layers	LLRZ-MAP	Not Stated		100 Waimea Street property remains as a Rural Zone.
Southland Developers Ltd.	S98.003	LLRZ - Large Lot Residential Zone	LLRZ - General	Amend	52 and 60A Waimea Street were designed to accommodate residential allotments and submitted for resource consent. The PDP re-zones the subject site to Large Lot Residential4 (LLR) alongside other properties on the northern side of Waimea Street. LLRZ fragments land into an allotment pattern which becomes problematic towards achieving higher residential densities in the future. The subject site, or those other adjoining properties zoned LLR to have any topographical or geotechnical constraints that would suggest a LLR zone makes efficient use of land and the subject sites do not adjoin any natural features with high values. See complete submission for further supporting documents	The submitter seeks that: a) The PDP LLR over 52 and 60A Waimea Street and adjoining properties is replaced with a General Residential Zone and the property at 100 Waimea Street remains as a Rural Zone. b) Any such further additional or alternative relief and any consequential or ancillary changes that give effect to the relief set out in (a) above.
Southland District Council	S146.001	Whole Plan	Whole Plan	Support in part	Southland District Council thanks Gore District Council for the opportunity to comment. SDC congratulates those involved for their excellent work. Southland District Council supports in part the proposed Gore District Plan, with some issues being discovered during review. No significant cross-boundary issues were identified, only possible differences in the NFL section were identified.	Specific decisions requested are described in the specific sections of this document.

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					The proposed District Plan will bring positive outcomes to Gore communities and the Southland region as a whole.	
Southland District Council	S146.002	Introduction	Introduction - general	Support	The submitter agrees with this section and no issues were identified.	None specified.
Southland District Council	S146.003	How the Plan works	How the plan works - general	Support	The submitter agrees with this section and no issues were identified.	None specified.
Southland District Council	S146.004	Interpretation	Definitions	Support in part	The submitter considers the Proposed District Plan to have a good interpretation section.	None specified.
Southland District Council	S146.005	Interpretation	homestay	Oppose in part	Conflict with the Homestay and Visitor Accommodation definitions and provisions. The two terms are being used and the Homestay definition is a narrower application of the Visitor Accommodation definition.	The Homestay definition is improved.
Southland District Council	S146.006	Interpretation	visitor accommodation	Oppose in part	Conflict between the Homestay and Visitor Accommodation definitions and provisions. Both of the terms are being used and the Homestay definition is a narrower application of the Visitor Accommodation definition.	The Visitor Accomadtion defintion is improved.
Southland District Council	S146.007	National Direction Instruments	National Direction Instruments	Support	The submitter agrees with this section and no issues were identified.	None specified.
Southland District Council	S146.008	MW - Mana Whenua	MW - General	Support	None specified.	None specified.
Southland District Council	S146.009	UFD - Urban form and development	UFD-General	Support	The submitter agrees and supports this section. New provisions for Urban environments are to be livable, connected, safe and well-designed spaces, while rural areas will largely be focused on providing for primary production and rural industry.	The submitter notes that this section may be improved by adding provisions focused on the following. (a) nature-based solutions are preferred over hard-engineering solutions, and (b) comprehensive area-wide measures are preferred over site-specific solutions.
Southland District Council	S146.010	ENRG - Energy	ENRG - General	Support in part	Energy- ENRG not standard National Planning Standard heading, usually bundled with infrastructure and or transport. To mitigate the impact on the Southland District, it is essential to avoid prominent ridgelines, significant natural areas, and zones of indigenous biodiversity shared with Southland District Councils. Skylines are mentioned in NFL-P1(3)(a) in the case of the Hokonui Hills and visually prominent hillslopes, but this could be made more explicit as other values are directly in the ENRG chapter.	Align the Energy unique identifier with NPS and/ or other Councils. Consideration of energy infrastructure for generation and transmission provisions with Significant natural areas and areas of indigenous biodiversity, particularly those areas in proximity to or shared with the Southland District.
Southland District Council	S146.012	INFR - Infrastructure	INFR - General	Support in part	Potential mistakes in the implementation of the National Planning Standards highlighted for accuracy and to ensure provisions between Councils are standardised.	The Network Utilities and Network Utility Operator have conflict between their definitions. As part of National Planning Standards, it states in Section 14. Definitions, Point 1: "Where terms defined in the Definitions List are used in a policy statement or plan, and the term is used in the same context as the definition, local authorities must use the definition as defined in the Definitions List." Several councils either implement the Network Utility Operator definition on their own or have modified their Network Utility definition to become a subcategory of the RMA definition to remove the conflict.
Southland District Council	S146.013	TRANS - Transport	TRANS - General	Support in part	Numbered routes running between Gore District and Southland District are the responsibilities of NZTA, but other key routes would be classed as	There are some other key routes that are the responsibility of GDC and SDC. These would be classed as Rural Connectors and include the following: Pyramid Waiparu Rd. Wyndham Rd.

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					rural connectors and are the responsibility of SDC and GDC.	Waimea Valley Rd. Waimumu Rd/Te Tipua School Road (on either side of SH 96) GDC should work with SDC to ensure these are prioritised both for their current role and as a backup for when there are road closures on the State Highway system.
Southland District Council	S146.014	CL - Contaminated Land	CL - General	Support	This would be in best interest of all parties including SDC and downstream residents of GDC.	GDC to compile more information on potentially contaminated land, and a testing regime is used for areas known to have held improperly stored hazardous substances.
Southland District Council	S146.016	NH - Natural Hazards	NH - General	Support in part	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.	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.
Southland District Council	S146.018	NH - Natural Hazards	NH-P1	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.019	NH - Natural Hazards	NH-P2	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.021	NH - Natural Hazards	NH-P3	Support in part	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.	Modification of policies to identify specific levels of risk within the district.

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Southland District Council	S146.023	NH - Natural Hazards	NH-P4	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.024	NH - Natural Hazards	NH-P5	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.025	NH - Natural Hazards	NH-P6	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.026	NH - Natural Hazards	NH-P7	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.027	NH - Natural Hazards	NH-P8	Support in part	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.	Modification of policies to identify specific levels of risk within the district.
Southland District Council	S146.028	HAZS - Hazardous Substances	HAZS-P1	Support in part	The Proposed GDP discusses in HASZ-P1(3) and HASZ-P2(4) "locating significant hazardous facilities outside the Mataura River Floodway and all mapped district inundation areas". This will help	Include other hazardous areas, such as areas prone to liquefaction. A provision enabling a licensing and monitoring regime for hazardous substance storage may be of use for mitigating risk.

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					reduce risks posed by hazardous substance storage. Could it be broadened to include other hazardous areas, such as areas prone to liquefaction? A provision enabling a licensing and monitoring regime for hazardous substance storage may be of use for mitigating risk.	
Southland District Council	S146.029	HAZS - Hazardous Substances	HAZS-P2	Support in part	The Proposed GDP discusses in HASZ-P1(3) and HASZ-P2(4) "locating significant hazardous facilities outside the Mataura River Floodway and all mapped district inundation areas". This will help reduce risks posed by hazardous substance storage. Could it be broadened to include other hazardous areas, such as areas prone to liquefaction? A provision enabling a licensing and monitoring regime for hazardous substance storage may be of use for mitigating risk.	Include other hazardous areas, such as areas prone to liquefaction. A provision enabling a licensing and monitoring regime for hazardous substance storage may be of use for mitigating risk.
Southland District Council	S146.030	HAZS - Hazardous Substances	HAZS - General	Support in part	The Proposed Gore District Plan discusses in HASZ-P1(3) and HASZ-P2(4) "locating significant hazardous facilities outside the Mataura River Floodway and all mapped district inundation areas". This will help reduce risks posed by hazardous substance storage. Could it be broadened to include other hazardous areas, such as areas prone to liquefaction? A provision enabling a licensing and monitoring regime for hazardous substance storage may be of use for mitigating risk.	review other not mentioned hazardous areas, such as areas prone to liquefaction, and provisions enabling a licensing and monitoring regime for hazardous substance storage may be of use for mitigating risk
Southland District Council	S146.031	HH - Historical Heritage	HH - General	Support	No apparent issues with this section of the PGDP. An archaeological alert layer is of potential interest to Southland District Council but would have to be designed and put into place with Te Ao Marama and Hokonui Rūnanga. Perhaps it would be possible to work on the archaeological alert layer with Invercargill City Council and Environment Southland as well.	No decision requested
Southland District Council	S146.032	Historical and Cultural Values map layers	HH-MAP-Archaeological Site	Support	Some of your archaeological sites may be mapped too closely. Some of the archaeological sites mapped on the online map appear to be too close for the New Zealand Archaeological Association (NZAA) requirements, and buffer polygons are directly centred on the sites, which can be an issue for lack of obfuscation and increase the risk of destruction.	No decisin requested
Southland District Council	S146.033	TREE - Notable Trees	TREE - General	Support	The submitter supports this section, and no issues were identified.	None specified.
Southland District Council	S146.034	SASM - Sites and Areas of Significance to Māori	SASM - General	Support	None specified.	None specified.
Southland District Council	S146.035	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Support	Good provisions on restoration of significant management areas.	None specified.

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Southland District Council	S146.036	ECO - Ecosystems and Indigenous Biodiversity	ECO-O2	Support	SDC and GDC could work together to ensure the region's criteria for significant natural areas are aligned. Potentially, some significant natural areas would be on the boundary between the two councils. The section could be served by addressing methods other than rules, as in the Operative Southland District Plan. Regarding future updates of this section, are there plans to identify more SNAs? and what mechanisms are in place to add new ones?	No decision requested
Southland District Council	S146.038	ECO - Ecosystems and Indigenous Biodiversity	ECO-P9	Support	This provision addresses some siting of renewables and critical infrastructure.	None specified.
Southland District Council	S146.039	NFL - Natural Features and Landscapes	NFL - General	Oppose in part	The Southland District Council is undertaking a Plan Change associated with the Natural Features and Landscape section of the District Plan and there may be cross-boundary issues. Submitter has raised some issues to mitigate cross-boundary issues and to provide consistency between the districts. Potential mistakes in the implementation of the National Planning Standards highlighted for accuracy and to ensure provisions between Councils are standardised. The National Planning Standard in Section 7. District Wide Matters point 20 states "if provisions to protect the natural character of wetlands, lakes and rivers and their margins are addressed, they must be located in the Natural character chapter." Other councils within New Zealand have interpreted this requirement and broadened it beyond wetlands, rivers, and lakes to include all significant freshwater bodies.	Work on cross-boundary issues with SDC, particularly adverse effects on the Hokonui Hills ONFL area. Lack of objective for maintaining or enhancing their ONFL landscapes in addition to inappropriate direct-use objectives. The Proposed Plan does not have an objective for identifying ONFLs and alignment with Objective LNF.2 of the Southland Regional Policy Statement. Consideration of geological sites of national or higher importance, that may need ONFL level protections. Integrating geoheritage sites into the Natural Features and Landscapes section. There is a strip of land between the Hokonui Hills ONFL and Southland District that we think may be best zoned as Visual Amenity Landscape (VAL) or equivalent, and another area further south that adjoins Southland District along native vegetation that should also be zoned as VAL.
Southland District Council	S146.049	NFL - Natural Features and Landscapes	NFL-O1	Oppose in part	The PDP lacks an objective to protect (ONFL) from adverse effects beyond direct use. This gap may result in activities on adjacent properties, like the spread of Wilding Trees reducing the biotic/abiotic values highlighted in Appendix 5. Several Councils have objective for maintaining or enhancing their ONFL landscapes in addition to inappropriate direct-use objectives. Adopting an umbrella objective focused on maintaining or enhancing ONFL landscapes would be appropriate for the Gore District Council. Additionally, incorporating an objective for identifying ONFLs, akin to Objective LNF.2 in the Southland Regional Policy Statement, would align with higher-level documents and provide flexibility for protecting new areas and would also address potential future additions, like geoheritage sites of national or higher importance, ensuring a comprehensive strategy for natural landscape preservation.	Work on cross-boundary issues with SDC, particularly adverse effects on the Hokonui Hills ONFL area. Lack of objective for maintaining or enhancing their ONFL landscapes in addition to inappropriate direct-use objectives. The Proposed Plan does not have an objective for identifying ONFLs and alignment with Objective LNF.2 of the Southland Regional Policy Statement. Consideration of geological sites of national or higher importance, that may need ONFL level protections. Integrating geoheritage sites into the Natural Features and Landscapes section. There is a strip of land between the Hokonui Hills ONFL and Southland District that we think may be best zoned as Visual Amenity Landscape (VAL) or equivalent, and another area further south that adjoins Southland District along native vegetation that should also be zoned as VAL.

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Southland District Council	S146.051	NFL - Natural Features and Landscapes	NFL-P2	Oppose in part	This provision is unique compared to the rest as it does not have a larger Outstanding Natural Feature or Landscape clause, which may require it to be located in the NFL chapter.	Move this Policy to the Natural Character chapter and should have a specific objective for restoration and/ or enhancement to fully support the policy.
Southland District Council	S146.052	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Support in part	Appendix 5 identifies the Mataura River and its river margins and an active flood plain as a High Natural Character Feature. If these are the values of the Mataura River, then provisions related to this area within the Gore District should be addressed in a Natural Character section.	Provisions related to this Mataura River area within the Gore District should be addressed in a Natural Character section.
Southland District Council	S146.053	PA - Public Access	PA - General	Support	The submitter supports the objective and policies and notes the new provisions should reduce any cross-boundary issues.	None specified.
Southland District Council	S146.054	SUB - Subdivision	SUB - General	Support in part	The submitter supports the objective and policy additions.	None specified.
Southland District Council	S146.055	SUB - Subdivision	SUB-R4	Oppose	The submitter is unsure what the provision will accomplish and what subdivisions will qualify for this provision. Similar phrasing has been used in the SDC DP and concerns have been raised around the interpretation and implementation. Suggests if the phrasing is kept a clarification note or non-exclusive list of qualifying activities be included.	Clarify what this rule is trying to accomplish
Southland District Council	S146.057	ASW - Activities on the Surface of Water	ASW - General	Support in part	Support in principle but some provision may be better placed in a NATC chapter. In order for migratory fish species populations to be healthy in the Mataura River, Southland District Council may need to align policies specific to the Mataura River with those of GDC.	Some provisions dealing with natural character and waterbody margins may be better placed in a NATC - Natural Character chapter or supported in such a chapter.
Southland District Council	S146.059	ASW - Activities on the Surface of Water	ASW-P2	Support in part	May be better suited in the NATC Natural Character chapter or supported in such a chapter.	Reconsideration of the placement of ASW-P2 in to a Natural Character chapter or supported in such a chapter.
Southland District Council	S146.060	ASW - Activities on the Surface of Water	ASW-P4	Support in part	May be better suited in the NATC Natural Character chapter or supported in such a chapter.	Reconsideration of the placement of ASW-P4(1) into a Natural Character chapter or supported in such a chapter.
Southland District Council	S146.061	ASW - Activities on the Surface of Water	ASW-P5	Support in part	May be better suited in the NATC Natural Character chapter or supported in such a chapter.	Reconsideration of the placement of ASW-P5(1)(a) into a Natural Character chapter or supported in such a chapter.
Southland District Council	S146.062	EW - Earthworks	EW - General	Support in part	Supports the setbacks from Rivers and Streams being tied to the stream order and the matters of discretion for EW-S3 are fitting and should reduce impacts downstream. The explicit mention of the archaeological alert layer in Note 4 is of interest to Southland District Council as a way of reducing risk to archaeological sites.	None specified.
Southland District Council	S146.063	EW - Earthworks	EW-O1	Support in part	This provision covers a lot of ground and may be better separated into more than one objective.	Separate provision into more than one objective.

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Southland District Council	S146.064	EW - Earthworks	EW-R3	Support	Supports the setback from river and streams being tied to a stream order. Supports the matters of discretion noting they should reduce downstream impacts.	None specified.
Southland District Council	S146.066	EW - Earthworks	EW-Additional provisions sought	Support	Note 4 is of interest to SDC as a way of reducing risk to archaeological sites.	No decision requested.
Southland District Council	S146.067	LIGHT - Light	LIGHT - General	Support	The submitter supports this section.	None specified.
Southland District Council	S146.068	NOISE - Noise	NOISE - General	Support	The submitter supports this section.	None specified.
Southland District Council	S146.069	SIGN - Signs	SIGN - General	Support	The submitter supports this section.	None specified.
Southland District Council	S146.070	TEMP - Temporary Activities	TEMP - General	Support	The submitter supports this section.	None specified.
Southland District Council	S146.071	LLRZ - Large Lot Residential Zone	LLRZ - General	Support	SDC has no comparable zone, future LLRZ would align in some regard with Gore. Southland being a neighbour of the Gore District shares issues with conflict between maintaining HPL and providing housing for people. LLRZ is both expansive in area and expensive for councils to keep and may not be suited to taking up highly productive land, or, as found on the edge of Gore District may be best suited for GRZ use, mainly as it takes up high ground next to the town. The suggestion to tie setbacks from Rivers and Streams to stream order is valuable, and the discretionary matters outlined in LLRZ-S7 are appropriate, aiming to minimise downstream impacts.	Review possible increases issues with sewage
Southland District Council	S146.074	LLRZ - Large Lot Residential Zone	LLRZ-P2	Support in part	LLRZ is both expansive in area and expensive for councils to keep and may not be suited to taking up highly productive land, or, as found on the edge of Gore District may be best suited for GRZ use, mainly as it takes up high ground next to the town. LLRZ-P2 may help reduce the financial burden on Gore DC but increases potential issues with sewage.	Review possible increases issues with sewage
Southland District Council	S146.076	GRZ - General Residential Zone	GRZ - General	Oppose in part	Currently, most residential land in Southland is zoned as equivalent to the General Residential Zone. Some of those areas zoned GRZ in the proposed plan may be more suitable as MRZ as a way of adapting to increased flood risk, as much of the centre of Gore lies in the flood plain of the Mataura.	Review zoning classification to minimise issues adapting to climate change and flood risk. Much of the centre of Gore lies in the flood plain of the Mataura.
Southland District Council	S146.077	GRZ - General Residential Zone	GRZ-S7	Support	The submitter supports this rule and the matters of discretion and notes that it should reduce impacts downstream.	None specified.

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Southland District Council	S146.078	MRZ - Medium Density Residential Zone	MRZ - General	Support	SDC has no comparable zone, any future zone would likely be aligned in some regard with GDC. The MRZ appears to be a recognition of the facts on the ground in Gore. However, much of it appears to be in the floodplain of the Mataura. Zoning more high ground into MRZ may be a good way of lessening the impacts of flooding long term.	Review zoning classification to minimise issues adapting to climate change and flood risk. Much of the centre of Gore lies in the flood plain of the Mataura.
Southland District Council	S146.080	MRZ - Medium Density Residential Zone	MRZ-S6	Support	The submitter supports this rule and the matters of discretion and notes that it should reduce impacts downstream.	None specified.
Southland District Council	S146.081	GRUZ - General Rural Zone	GRUZ - General	Support in part	The NES-CF allows Councils to implement regulations concerning afforestation within their District. The principal activity for the General Rural Zones is primary production, having provisions concerning afforestation within this zone would be appropriate.	Update the proposed District Plan with the amendments to the National Environmental Standard for Commercial Forestry (NES-CF) as part of the provisions. At the minimum, Note 2 may need to be revised to reflect the change in legislation and the ability for Gore District Council to regulate commercial forestry. There are other zones which contain this note as well. structure for the General Rural Zone.
Southland District Council	S146.082	RLZ - Rural Lifestyle Zone	RLZ - General	Support in part	To facilitate rural lifestyle activities in addition to rural activities, then commercial activities and primary industries (including commercial Forestry) may be inappropriate for this zone. Southland District Council has no comparable zone to the RLZ in the District Plan, but any future RLZ would likely be aligned in some regard with Gore. Southland District, as a neighbour of Gore shares issues with the conflict between maintaining highly productive land and providing housing for people. RLZ is both expansive in area and expensive for councils to maintain and may not be suited to taking up highly productive land. It may be suited to higher-density use as it is adjacent to the town.	Update the proposed District Plan with the amendments to the National Environmental Standard for Commercial Forestry (NES-CF) as part of the provisions.
Southland District Council	S146.084	RLZ - Rural Lifestyle Zone	RLZ-R9	Support in part	f these zones are meant to facilitate rural lifestyle activities in addition to rural activities, then commercial activities and primary industries (including commercial Forestry) may be inappropriate for this zone.	More restrictive rules on Commercial Forestry and any primary production activity to facilitate rural lifestyle activities in addition to rural activities.
Southland District Council	S146.085	RLZ - Rural Lifestyle Zone	RLZ-S7	Support	The submitter supports this rule and the matters of discretion and notes that it should reduce impacts downstream.	None specified.
Southland District Council	S146.086	SETZ - Settlement Zone	SETZ - General	Support	The submitter supports this chapter.	None specified.
Southland District Council	S146.087	NCZ - Neighbourhood Centres Zone	NCZ - General	Support	The submitter supports this chapter.	None specified.
Southland District Council	S146.088	LCZ - Local Centre Zone	LCZ - General	Support	The submitter supports this chapter.	None specified.
Southland District Council	S146.089	MUZ - Mixed Use Zone	MUZ - General	Support	The submitter supports this chapter.	None specified.
Southland District Council	S146.090	TCZ - Town Centre Zone	TCZ - General	Support	The submitter supports this chapter.	None specified.
Southland District Council	S146.091	LIZ - Light Industrial Zone	LIZ - General	Support	The submitter supports this chapter.	None specified.
Southland District Council	S146.092	GIZ - General Industrial Zone	GIZ - General	Support	The submitter supports this chapter.	None specified.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Southland District Council	S146.093	NOSZ - Natural Open Space Zone	NOSZ - General	Support	The NOSZ protects Dolamore Park and Croydon Bush Reserve which are both across Dolamore Park Rd from SDC. SDC does not currently have a NOSZ or SNAs, so cross boundary issues are likely to be SDC affecting GDC and not the reserve.	None specified.
Southland District Council	S146.094	SARZ - Sports and Active Recreation Zone	SARZ - General	Support	The submitter supports this chapter and considers SARZ zones are an excellent land use choice for areas prone to inundation.	None specified.
Southland District Council	S146.095	MPZ - Māori Purpose Zone	MPZ - General	Support	None specified.	None specified.
Southland District Council	S146.096	Appendix 5 - NFL-APP - Landscape Values	APP5-NFL-APP	Support in part	The Proposed District Plan does not have an objective that would protect ONFL areas from adverse effects outside of direct use. This could result in activities Within Appendix 5, the Mataura River is identified as a High Natural Character Feature, including its river margins and an active flood plain. If these are the values of the Mataura River, then provisions related to this area within the Gore District should be addressed in a Natural Character section occurring on an adjoining property that could have an adverse effect on the Hokonui Hills ONFL area, such as Wilding Trees reducing the biotic/abiotic values highlighted in Appendix 5.	Incorporate into the Proposed District Plan an objective that would protect ONFL areas from adverse effects outside of direct use.
Southland District Council	S146.097	Historical and Cultural Values map layers	HH-MAP- Archaeological Site	Oppose in part	Archaeological sites mapped as points seem to be closer than allowed by NZAA. Buffer layers are centred for sites which can put sites in jeopardy. Southland District Council may have similar issues and the councils may be best served by working together and with Tangata Whenua for a suitable solution.	Review NZAA requirements for mapping Archaeological sites.
Southland District Council	S146.100	Historical and Cultural Values map layers	TREE-MAP	Support	The submitter supports this section.	None specified.
Southland District Council	S146.101	Natural environmental Values map layers	ECO-MAP- Significant Natural Area	Support in part	SNA-1 borders Southland District.	Review cross-boundary issues with SDC.
Southland District Council	S146.102	Natural environmental Values map layers	NFL-MAP- Hokonui Hills	Oppose in part	Hokonui Hills borders Southland District.	Review cross-boundary issues with SDC.
Southland District Council	S146.103	Natural environmental Values map layers	NFL-MAP- Mataura River	Oppose in part	The Mataura esplanade strip does not follow the course of the Mataura River and should probably be re-established.	Update the course of the Mataura River
Southland District Council	S146.104	Development Areas map layers	DEV1-ODP-South Gore	Oppose in part	The South Gore Industrial Development area is susceptible to inundation. Development in areas susceptible to flooding increases the risks to infrastructure and populations downstream.	Review the risk of inundation to this area.
Southland District Council	S146.105	Information only map layers	MAP Streams and Rivers	Oppose in part	The esplanade strip no longer follows the current course of the Mataura River	Request to review the course of the esplanade strip along the Mataura River.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Southland District Council	S146.106	Maps	Map - general	Support	The submitter supports the mapping.	Requests to add a feature that zooms to a feature by clicking on the feature in the legend.
Southland District Council	S146.107	INFR - Infrastructure	INFR-R5	Support	Setbacks from Rivers and Streams being tied to stream order is a useful idea, and the matters of discretion for INFR-S5 are fitting and should reduce impacts downstream.	No decision requested
Southland District Council	S146.108	EW - Earthworks	EW-O1	Support in part	We have some concerns EW-O1 and environmental areas, such as sedimentation, water quality risks from earthworks and visual effects in landscapes adjoining Southland District, particularly in Outstanding Natural Landscapes or Visual Amenity Landscapes.	Review EW-O1 and environmental areas, such as sedimentation, water quality risks from earthworks and visual effects in landscapes adjoining Southland District, particularly in Outstanding Natural Landscapes or Visual Amenity Landscapes.
Southland District Council	S146.109	Appendix 3 - River and stream order	APP3	Support	Excellent idea. The "Gore District - Southwest" map appears to be slightly truncated.	none specified
Southland District Council	S146.110	Information only map layers	MAP Streams and Rivers	Oppose in part	Esplanade strips along the Mataura River no longer follow the current course of the Mataura River, and should probably be re-established along the current course.	Update the course of the Mataura River
Southland Federated Farmers of New Zealand	S126.001	Introduction	Description of the District	Support in part	The contribution of agriculture to the district's economy should feature in the description of the district. Agriculture is the backbone of the district's economic well-being.	Amend description of the district: The dominant land use in the district relates to agriculture, and agriculture is the backbone of the district's economy.
Southland Federated Farmers of New Zealand	S126.002	Interpretation	abrasive blasting	Support	Adopts the National Planning Standard definition	Retain as notified
Southland Federated Farmers of New Zealand	S126.003	Interpretation	access strip	Support	Adopts the Resource Management Act 1991 definition.	Retain as notified
Southland Federated Farmers of New Zealand	S126.004	Interpretation	additions	Support	This definition relates specifically to historic heritage therefore provides clarity for the reader.	Retain as notified
Southland Federated Farmers of New Zealand	S126.005	Interpretation	agricultural aviation activity	Oppose	SFF support the inclusion of a definition, however greater clarity and detail is required.	~~means the use of aircrafts or helicopters used ancillary and in association with primary production.~~ Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed wing aeroplanes, helicopters, and unmanned aerial vehicles
Southland Federated Farmers of New Zealand	S126.006	Interpretation	agricultural, horticultural and pastoral activities	Oppose in part	While the definition is an accurate description of the activities associated with farming it is noted that the term 'rural production activities' is used in many places throughout the Plan. This is confusing and there should be consistency and clarity in the usage of terms. SFF seeks that the description in the definition for agricultural, pastoral, horticultural activities is retained but renamed 'rural production activities' and the term rural production activities used consistently throughout the plan.	Amend title and make any consequential amendments: ~~Agricultural, horticultural and pastoral activities~~ Rural production activities
Southland Federated Farmers of New Zealand	S126.007	Interpretation	ancillary activity	Support	The notified definition follows the National Planning Standards.	Retain as notified

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Southland Federated Farmers of New Zealand	S126.008	Interpretation	artificial outdoor lighting	Support in part	This definition seems to be aimed at lighting that may have an impact on the outdoor environment, but the wording used here cannot realistically be called an appropriate definition for Artificial Outdoor Lighting. If it is artificial then the definition should cover electrical power. Further, the Council should decide if they wish to capture bonfires, camp fires or kerosene lamps in this definition; as the way it is written it could easily do so.	Amend definition and make any necessary consequential amendments: any electrically-powered exterior or nonresidential interior lighting and/or sign that emits directly into the outdoor environment. ~~and includes signs.~~
Southland Federated Farmers of New Zealand	S126.009	Interpretation	biological diversity (or biodiversity)	Support in part	The notified definition follows the definition in the Resource Management Act 1991. However, in the RMA the shortened term of 'biodiversity' is not used as the Council has done in the Plan. It is suggested that if the Council is stating this is the RMA definition then only the RMA term should be used.	Amend term and make any necessary consequential amendments: Biological diversity ~~(or biodiversity)~~
Southland Federated Farmers of New Zealand	S126.010	Interpretation	bore	Support	The notified definition follows the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.011	Interpretation	building	Support	The notified definition follows the National Planning Standards	Retain as notified
Southland Federated Farmers of New Zealand	S126.012	Interpretation	Definitions	Support	SFF recommends the Council include a definition for collector road.	Include new definition (Collector Road) and make any necessary consequential amendments.
Southland Federated Farmers of New Zealand	S126.013	Interpretation	conservation activity	Support in part	While SFF supports this recognition of restoration planting, the definition needs further clarity and flexibility to properly acknowledge a wide range of conservation activities. For example, eradicating invasive species, like some types of willows, that are not automatically recognised as weeds or pests. The definition should also accommodate situations where introduced species do provide good food sources for native birds.	Amend and make any necessary consequential amendments: Activities to manage, maintain and/or enhance ~~Means the use of land for the management, maintenance and enhancement of ecological values for indigenous vegetation and fauna and their habitats. It may include: includes: (a) both western Science or mātauranga Māori; (b) weed, invasive species and pest control; (c) fencing and farm fencing; and (d) restoration planting.~~
Southland Federated Farmers of New Zealand	S126.014	Interpretation	cultivation	Support	The notified definition follows the National Planning Standards	Retain as notified
Southland Federated Farmers of New Zealand	S126.015	Interpretation	dead holes	Support	SFF supports the inclusion of this definition.	Retain as notified
Southland Federated Farmers of New Zealand	S126.016	Interpretation	earthworks	Support	The notified definition follows the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.017	Interpretation	farm quarry	Support in part	On the whole, we support the definition, however it is not practical to require that a farm quarry can only serve farm activities that occur on the same site. The term site is defined in the National Planning Standards and the Plan as meaning as single record of title. Many farms will have a number of titles and it is not practical that a farm quarry use is limited to only the title on which it exists, rather than the full property or operation. Most farm quarries would serve rural production activities across the farm.	Amend definition and make any necessary consequential amendments: Means a location or area intermittently used in association with agricultural activities for the permanent removal and extraction of aggregates (clay, silt, rock or sand) for non-commercial use ~~within the same site where it is extracted.~~ It includes the area of aggregate resource and surrounding land associated with the operation of a farm quarry and which is used for farm quarrying activities. It does not include earthworks or the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the farm quarry

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Southland Federated Farmers of New Zealand	S126.018	Interpretation	farm track	Support	This definition captures the normal use of a farm track.	Retain as notified
Southland Federated Farmers of New Zealand	S126.019	Interpretation	feedlot	Oppose	While this term is defined in the Plan, it does not feature in the Plan at all, therefore it does not need to be included.	Remove definition: ~~Means a stockholding area where cattle — a) are kept for at least 80 days in any 6 month period; and (b) are fed exclusively by hand or machine.~~
Southland Federated Farmers of New Zealand	S126.020	Interpretation	fences	Oppose	This definition is confusing and causes issues throughout the plan, and we suggest farm fences are excluded. All amendments must be made throughout the plan.	Amend definition: and make any consequential amendments: Means any structure, intended to be a permanent division, screen or barrier, but shall not include a farm fence.
Southland Federated Farmers of New Zealand	S126.021	Interpretation	Definitions	Support	There are inconsistencies throughout the plan whereby the proposed definition of fences attempts to cater to multiple purposes. Having a separate definition for a farm fence would allow clear separation of rules/standards applicable. We recommend the Council simplifies it's approach to fencing in this respect and considers what the problem is it is actually trying to solve. We found limited narrative on fencing in any of the s 32 reports.	Include new definition "farm fences" and make any consequential amendments: Means any fence erected for the purposes of any primary production activity.
Southland Federated Farmers of New Zealand	S126.022	Interpretation	fresh water	Support in part	This definition follows the RMA definition, however the RMA states 'freshwater or fresh water'. If the Council wishes to use the RMA definition this should be done verbatim.	Amend definition: ~~Fresh water~~ Freshwater or fresh water
Southland Federated Farmers of New Zealand	S126.023	Interpretation	functional need	Support	The notified definition follows the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.024	Interpretation	highly productive land	Support	The notified definition follows the National Policy Statement for Highly Productive Land.	Retain as notified
Southland Federated Farmers of New Zealand	S126.025	Interpretation	indigenous vegetation	Support	The notified definition follows the National Policy Statement for Indigenous Biodiversity.	Retain as notified
Southland Federated Farmers of New Zealand	S126.026	Interpretation	indigenous vegetation clearance	Oppose in part	As drafted, the definition does not provide for excluding grazing as it states 'clearing or removal of indigenous vegetation by any means'. Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being 'cleared' pursuant to the current proposed definition. Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assisting with regeneration. It is not clear what is meant by 'overplanting'. Where the vegetation is within areas of improved pasture, especially on hill country, overplanting (e.g. by helicopter) followed by grazing to trample in the seed is common practice and allows for pasture renewal. It is crucial that this be removed from the definition.	Amend definition and make any necessary consequential amendments: Means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, , burning or any other mechanical means. ~~as well as mob stocking.~~ It does not include grazing of pasture or improved pasture species in that area of indigenous vegetation.
Southland Federated Farmers of New Zealand	S126.027	Interpretation	intensive indoor primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified

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Southland Federated Farmers of New Zealand	S126.028	Interpretation	Definitions	Support	We recommend a new definition is included which aligns with the Proposed Southland Land and Water Plan.	Include a new definition for Intensive winter grazing: Grazing of stock between May and September (inclusive) on forage crops (including brassica, beet and root vegetable crops), excluding pasture and cereal crops.
Southland Federated Farmers of New Zealand	S126.029	Interpretation	landscape gardening	Support in part	The current definition is too broad and general, and does not appear to be scale-limited, as gardening usually is. It extends into agricultural activities like pastoral farming, arable growing, and horticulture. This definition can be remedied by excluding agricultural definitions and bringing in the concept of scale.	Amend definition and make any necessary consequential amendments: The small scale design, construction and maintenance of ornamental gardens and outdoor areas and growing and caring for plants. It includes the alteration or disturbance of land (or any matter constituting the land including soil, clay, sand and rock) that does not permanently alter the profile, contour or height of the land. To avoid doubt, this definition excludes agricultural activities.
Southland Federated Farmers of New Zealand	S126.030	Interpretation	land transport infrastructure	Support in part	We agree to most of the items listed in the definition as objects that support the movement of people and goods by land. However, we do not believe clause m items actually do 'support the movement of people and goods by land'.	Accept most of the definition as notified but delete clause m and make any consequential amendments: (m) Stormwater management facilities, ventilation structures, drainage devices and erosion control devices; and
Southland Federated Farmers of New Zealand	S126.031	Interpretation	minor residential unit	Support	The notified definition follows the National Planning Standards	Retain as notified
Southland Federated Farmers of New Zealand	S126.032	Interpretation	modify	Support	The notified definition makes clear that 'modify' is in relation to an archaeological site	Retain as notified
Southland Federated Farmers of New Zealand	S126.033	Interpretation	national grid yard	Oppose	The National Grid Yard definition needs to be amended so it is consistent with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1 around support structures. This definition and the yard widths are not consistent and unnecessarily onerous compared to the Code. It is vital to remember that the National Grid runs over private property, and farmers will be overwhelmingly affected by any regulation that exceeds the Code. This means the 12m distance around any structure is in excess of what is in the Code, and what is needed for engineering safety. The Code requires a safe distance of 8m around a 110kv pole. [Refer to original submission for full reasons at pg. 15]	Amend the definition to align with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1, and make any consequential amendments
Southland Federated Farmers of New Zealand	S126.034	Interpretation	noise	Support	Support as definition has the same meaning as section 2 of the RMA.	Retain as notified
Southland Federated Farmers of New Zealand	S126.035	Interpretation	noise sensitive activity	Support	SFF supports the activities listed as noise sensitive.	Retain as notified
Southland Federated Farmers of New Zealand	S126.036	Interpretation	notional boundary	Support	The notified definition follows the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.037	Interpretation	plantation forestry	Support	The notified definition follows the National Environmental Standards for Plantation Forestry	Retain as notified
Southland Federated Farmers of New Zealand	S126.038	Interpretation	primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified

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Southland Federated Farmers of New Zealand	S126.039	Interpretation	quarry	Support in part	Although there is a separate definition for farm quarries, they need to be clearly excluded from the definition of 'quarry'.	Amend definition to include below and make any consequential amendments: This definition does not include 'farm quarries'.
Southland Federated Farmers of New Zealand	S126.040	Interpretation	reverse sensitivity	Support in part	SFF support the inclusion of this definition. However, it would be better to utilise the term 'lawfully established' as referred to in the Plan rather than using 'approved, existing or permitted activity'.	Amend definition and make any necessary consequential amendments: The potential for a lawfully established ~~an approved (whether by consent or designation), existing or permitted~~ activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an approved, existing or permitted activity.
Southland Federated Farmers of New Zealand	S126.041	Interpretation	river	Support	Support as has the same meaning as the RMA.	Retain as notified
Southland Federated Farmers of New Zealand	S126.042	Interpretation	root protection area	Oppose	It is recommended that the Council uses the term 'tree protection zone' instead of the rootzone area. The term 'tree protection zone' is used in a number of plans and policies in New Zealand. It is a term that is recognised by suitably qualified arborists and can easily be calculated by (a) canopy drip line + 1m; (b) trunk diameter at 1.4m height multiplied by 12; and (c) tall narrow trees = ½ x Height.	Rename this definition: ~~Root protection area~~ Tree protection zone
Southland Federated Farmers of New Zealand	S126.043	Interpretation	rural airstrip	Support in part	The definition of rural airstrips will inappropriately capture an airstrip on a farm which is only used when fertiliser or spraying is done on that same farm. These airstrips will be located within a primary production property at a distance from settlements, so adverse effects will be internalised and/or are very short term and occasional. When not in use for aircraft, the airstrip will be used for grazing as part of the farm. Neighbours often work together and use the same contractor, so proximity to neighbours can be advantageous, and there is broad acceptance and understanding of the activity in the rural community.	Amend definition and make any necessary consequential amendments: Means any area of land in the rural environment intended or designed to be used, whether wholly or partly, for aircraft movement or servicing, excluding helicopters. This does not include land which is primarily used for grazing but intermittently as an airstrip or land area.
Southland Federated Farmers of New Zealand	S126.044	Interpretation	rural industry	Support	Support as has the same meaning as the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.045	Interpretation	sensitive activity	Support	SFF agrees with the list of sensitive activities.	Retain as notified
Southland Federated Farmers of New Zealand	S126.046	Interpretation	sign	Support	Support the definition of 'sign' which has the same meaning as per the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.047	Interpretation	silage pit	Support in part	More clarity is required for this definition.	Amend definition and make any necessary consequential amendments: Means an area constructed and used for the purpose of ensilement and fermentation of pasture , and storage of silage for animal feed.
Southland Federated Farmers of New Zealand	S126.048	Interpretation	significant natural area (SNA)	Oppose	SFF does not agree with including areas meeting the criteria in Appendix 1 that have not been mapped as SNAs. It is our view that until areas are mapped and included in the plan, they should not be considered SNAs. We also do not agree with identifying SNAs through resource consent applications or Farm Environment Plans (FEPs).	Amend definition and make any necessary consequential amendments: Has the same meaning as per the National Policy Statement for Indigenous Biodiversity and means: (a) Areas identified as SNA-1 (Waterfall Range) and SNA-2 (Pukerau Red Tussock Reserve) on the planning maps until a suitably qualified ecologist engaged by Gore District Council in partnership with landowners determines that it is not an SNA; or (b) any area that is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 4 and in consultation with the landowner. ~~SNA also includes~~

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					FEPs are not intended to be used as a trigger document for identifying SNAs. FEPs are farmer driven, created and funded, therefore tacking on a Council requirement which requires external experts adds complexity and cost for farmers. The cost/expertise to carry out SNA mapping should lie with central and local government, not individuals. FEPs could include a note of any SNAs evident on the land, but the actual process of SNA identification must sit outside of these plans. We remind the Council that identification of SNAs must be carried out in consultation landowners, as per ECO-O2: 'Work in partnership with Local Authorities, Government agencies, mana whenua, stakeholders and landowners to identify and protect Significant Natural Areas'. Full reason pg. 21	~~areas meeting the criteria outlined in Appendix 4 including those identified at resource consent stage or as part of a Farm Environment Plan assessment or as part of a Biodiversity Covenant.~~
Southland Federated Farmers of New Zealand	S126.049	Interpretation	vegetation clearance	Support in part	SFF requests this definition be amended to specifically exclude vegetation clearance undertaken in association with day-to-day farming. We are concerned that the definition will still catch many instances of ordinary pastoral farming practice in which vegetation clearance may have to be undertaken on a day-to-day basis and trigger the requirement for resource consent unnecessarily. Examples of such vegetation clearance include: clearance for the purpose of maintaining rural fire breaks, pasture maintenance, clearance of airstrips, helipads, vehicle entranceways, access ways and driveways, farm tracks and stock crossings of waterways, clearance around farm buildings and farm infrastructure, water supply dams, pipelines and troughs, pest plant/weedmanagement, cultivation, forestry harvesting, pruning and thinning, clearance or disturbance by animals including grazing, activities undertaken for the purpose of establishing a fence line, maintaining shelterbelts (including cutting of shelterbelt roots, activities associated with fruit tree or fruit vine plantations, clearance of vegetation that is fallen or dead, activities undertaken within the boundaries of any area of land, and clearance of pest plants. Farmers should not have to incur unnecessary delay and cost for routine vegetation clearance which will result in no more than minor adverse environmental effects.	Amend definition and make any necessary consequential amendments: Means (...) (c) does not include vegetation clearance which is ancillary to primary production activities, such as-- (i) the removal of sphagnum moss for the purpose of a harvest in accordance with regulation 48 or (...) (v) the grazing of improved pasture within the relevant setback from a natural wetland, pasture maintenance; (vi) clearance for the purpose of maintaining rural fire breaks; (vii) clearance of airstrips, helipads, vehicle entranceways, accessways and driveways, farm tracks and stock crossings of waterways; (viii) clearance around farm buildings and farm infrastructure, water supply dams, pipelines and troughs; (ix) cultivation; (x) clearance or disturbance by animals including grazing; (xi) activities associated with fruit tree or fruit vine plantations; and (xii) clearance of ve
Southland Federated Farmers of New Zealand	S126.050	Interpretation	Definitions	Not Stated	Vehicle movements is referred to in the Transport Chapter, however no definition is included.	Include new definition for vehicle movements and make any consequential amendments.
Southland Federated Farmers of New Zealand	S126.051	Interpretation	Definitions	Not Stated	To provide clarity, a definition for 'waste' should be included which aligns with the Waste Minimisation Act 2008.	Include new definition for waste and make any consequential amendments: Waste (a) means any thing disposed of or discarded; and (b) includes a type of waste that is defined by its composition or source (for example, organic waste, electronic waste, or construction and demolition waste); and (c) to avoid doubt, includes any component or element of diverted material, if the component or element is disposed of or discarded.

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Southland Federated Farmers of New Zealand	S126.052	Interpretation	wetland	Support	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Retain as notified
Southland Federated Farmers of New Zealand	S126.053	Interpretation	woodlot	Support in part	SFF considers the definition of woodlot should also exclude shelterbelts and trees planted for conservation purposes.	Amend definition and make any necessary consequential amendments: Means a stand of trees for the purposes of firewood, the creation of other wood products, a carbon sink, erosion control, pest, or wilding tree management purposes, but excluding plantation forestry, shelter belts and trees planted for conservation purposes.
Southland Federated Farmers of New Zealand	S126.054	MW - Mana Whenua	MW-2.4	Oppose	We acknowledge the relationship Ngāi Tahu hold with the natural environment in Gore District, however we are deeply concerned by the approach to consider the entire district as a site and request that individual sites are identified and included in the planning maps.	Remove this sentence: ~~Instead of restricting the consideration of Ngāi Tahu cultural values to a discrete list of 'sites and Areas of Significance to Māori', the underlying relationship Ngāi Tahu hold with the natural environment is accounted for throughout the district via provisions spread throughout various chapters.~~
Southland Federated Farmers of New Zealand	S126.055	UFD - Urban form and development	UFD-O1	Support in part	The Council should consider the development of the district in terms of the potential loss of highly productive land, which is essential for primary production. Support is given for the Council's acknowledgement of managing adverse effects between incompatible activities and zones.	Amend UFD-O1 to include: 10. considers the potential loss of highly productive soils.
Southland Federated Farmers of New Zealand	S126.056	UFD - Urban form and development	UFD-O10	Support in part	Support is given to this objective which identifies the importance of primary production activities being able to operate efficiently and effectively. However, the contribution of these activities should also be protected. To simply recognise the contribution of an activity does not provide the activity with protection.	Amend UFD-O10: Primary production and rural industry activities are able to operate efficiently and effectively and the contribution they make to the economic, social wellbeing and prosperity of the District is recognised and protected.
Southland Federated Farmers of New Zealand	S126.057	UFD - Urban form and development	UFD-O11	Support	This objective should refer to 'highly productive land' as this term is defined within the Plan.	Amend UFD-O11: ~~Productive, versatile~~ Highly productive land and natural, physical and cultural resources located within rural areas that are of significance to the District are protected and maintained.
Southland Federated Farmers of New Zealand	S126.058	ENRG - Energy	ENRG-O4	Support in part	This objective should reference safety as well as efficiency in operation.	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.
Southland Federated Farmers of New Zealand	S126.059	INFR - Infrastructure	INFR-Overview	Support in part	Highly productive land may not be a suitable site for infrastructure and this should be noted in the overview.	Amend INFR-Overview: However, some sites technically ideal for the location of infrastructure may be unsuitable having regard to their environmental effects, including impacts on landscape and biodiversity values, being highly productive land or the underlying relationships Ngāi Tahu hold with the natural environment.
Southland Federated Farmers of New Zealand	S126.060	INFR - Infrastructure	INFR-S3	Support in part	SFF questions why there is a different maximum height of any utility pole or mast as 25m for Rural Zone, Rural Lifestyle Zone, General Industrial Zone and Light and Industrial Zone and 13m for all other zones. The maximum height should be the same across all zones. There should also be a requirement for landowner consultation, particularly when consent is triggered.	Amend INFR-S3 to be the same across zones, either 25m or 13m. Add additional matter of discretion: 5. consent with landowner.
Southland Federated Farmers of New Zealand	S126.061	INFR - Infrastructure	INFR-S5	Oppose in part	SFF does not oppose the setback distances provided these do not apply to farm fencing. We have proposed a new definition for 'farm fencing' and it is crucial that this is accepted for farmers to be able to carry out daily farming operations. There is no need to disincentivise an activity like fencing,	Amend INFR-S5: 1. Any infrastructure building or structure (not including a farm fence which is not subject to setbacks) must be set back from the closest bank of any stream or river as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and 4); and (c) 5m for low order rivers or streams (order 1 and 2).

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					which has ultimate positive benefits for biodiversity, by requiring a resource consent to construct a fence. Fencing setbacks are covered by regional plans and therefore the duplication contained in the PDP must be removed.	
Southland Federated Farmers of New Zealand	S126.062	TRANS - Transport	TRANS-S3	Oppose in part	This standard refers to vehicle movements which are shown in italics, however no corresponding definition appears in the interpretation chapter. Without a definition of vehicle movements, it is difficult to comment on this standard. However, SFF do not support limitations on vehicle movements for farming purposes. In any one day there may be several 'vehicle movements' occurring as part of farming operations, particularly in busy seasons. While this is unlikely to be greater than 60 movements, there should not be any restrictions on the number of movements which can occur on farm. A farmer should not have to apply for a resource consent to allow multiple vehicles to visit their farm for farming operations. The reverse sensitivity effects of multiple vehicle movements are likely to be minimal if the movements are related to primary production in a rural setting.	Include definition of vehicle movements or specify that movements is in relation to vehicles. Amend TRANS-S3: The vehicle crossing is for on-site activities that individually or collectively generate less than 60 vehicle movements per day. This does not apply to vehicle movements for primary production activities.
Southland Federated Farmers of New Zealand	S126.063	CL - Contaminated Land	CL-P1	Oppose in part	Any investigation must be consistent with the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) which does not require primary production land investigations for existing primary production land use (s 5,(9)). It should be clear in this policy that the NES-CS is the basis of required investigations.	Amend CL-P1: Identify sites, as per the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 , that are known to contain contaminated soil as a result of current or historic land uses and activities.
Southland Federated Farmers of New Zealand	S126.064	HAZS - Hazardous Substances	HAZS-Overview	Support	Support is given to the focus on managing effects of hazardous substance on sensitive environments and on environments where sensitive activities are located in higher densities. The focus should be on the management of significant hazardous facilities.	Adopt Overview as drafted.
Southland Federated Farmers of New Zealand	S126.065	NH - Natural Hazards	NH-Overview	Support in part	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.	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.
Southland Federated Farmers of New Zealand	S126.066	NH - Natural Hazards	NH-P1	Support	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Retain NH-P1 as drafted.

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Southland Federated Farmers of New Zealand	S126.067	NH - Natural Hazards	NH-P3	Support in part	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Amend NH-P3: Add italics emphasis to ' mahinga kai '
Southland Federated Farmers of New Zealand	S126.068	NH - Natural Hazards	NH-P7	Support	Support is given as this policy provides a nonregulatory approach.	Retain NH-P7 as drafted.
Southland Federated Farmers of New Zealand	S126.069	NH - Natural Hazards	NH-Additional provisions sought	Support	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Include New Rule
Southland Federated Farmers of New Zealand	S126.070	HH - Historical Heritage	HH-P9	Support in part	Public access requires landowner consent. Heritage properties/sites are often people's homes and consent is therefore required from the landowner.	Amend HH-P9: 1. there are measures to minimise obstruction of public access, if access has been granted by the landowner , and/or views of the heritage item or archaeological site from adjoining public places, where relevant and appropriate;
Southland Federated Farmers of New Zealand	S126.071	HH - Historical Heritage	HH-P11	Support in part	Heritage buildings located on farmland can pose a risk to health and safety and be expensive for farmers to maintain. It is important that farmers have the ability to demolish or partially demolish if required. Any risk to safety of persons should warrant demolition. Determining what is considered a 'significant risk' to safety could be problematic and subjective.	Amend HH-P11: Avoid partial demolition of scheduled heritage items unless it is demonstrated that: 1. the part of the heritage item to be demolished poses a ~~significant~~ risk to the safety of persons or property; and/or...
Southland Federated Farmers of New Zealand	S126.072	HH - Historical Heritage	HH-P12	Support in part	Heritage buildings located on farmland can pose a risk to health and safety and be expensive for farmers to maintain. Any risk to safety of persons should warrant demolition. Determining what is considered a 'significant risk' to safety could be problematic and subjective.	Amend HH-P12: Avoid total demolition of scheduled heritage items unless: 1. the heritage item poses a ~~significant~~ risk to the safety of persons or property; and...
Southland Federated Farmers of New Zealand	S126.073	HH - Historical Heritage	HH-P14	Support	It is important to encourage non-regulatory methods for heritage conservation.	Retain HH-P14 as drafted.
Southland Federated Farmers of New Zealand	S126.074	TREE - Notable Trees	TREE-Additional provisions sought	Support	SFF supports the recognition and identification of notable trees which are of importance to the district and its communities. However, where a notable tree is located on private land it is important that the Council engage and work with landowners to ensure the tree is best managed for future generations.	Include a new policy: Consult and engage landowners where a notable tree or trees is located on private land.
Southland Federated Farmers of New Zealand	S126.075	SASM - Sites and Areas of Significance to Māori	SASM-Overview	Support in part	Typo to be amended.	Amend Overview: The Gore District Plan manages the impacts of high-risk activities on Ngāi Tahu cultural values, as opposed to restricting a wide range of activities at specific locations.
Southland Federated Farmers of New Zealand	S126.076	SASM - Sites and Areas of Significance to Māori	SASM-O1	Oppose	SFF does not agree with the approach to consider all 'land, waterbodies, natural features and marae within Gore District as site and areas of cultural significance. Farmers have a right to know what is on their land so they can plan for current and future land use. The approach proposed in the PDP creates a high level of uncertainty for all landowners in the district.	Amend SASM-O1: ~~Those~~ All land, waterbodies, natural features, and marae within Gore District which are identified as site(s) of significance to Māori in the Planning Maps are recognised as sites and areas of cultural significance to mana whenua and/or tangata whenua, and are afforded appropriate considerations relative to the cultural values identified in MW-2.3 in relation to their management, development, and use.
Southland Federated Farmers of New Zealand	S126.077	SASM - Sites and Areas of Significance to Māori	SASM-P1	Oppose	It is important to protect existing use rights therefore this policy requires an amendment. S 10 of the RMA discusses existing uses in relation to land protected and SFF request the policy represents this. The policy also implies that there	Amend SASM-P1: New use, subdivision, and development is enabled where adverse effects on Ngāi Tahu cultural values, ~~including those~~ listed in MW-2.3, are avoided, remedied or mitigated.

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					may be other cultural values other than what is listed in MW-2.3. However, this does not appear to be the intention as the MW chapter specifically lists and defines the cultural values. The wording should be amended to provide clarity that it is only the values listed in MW-2.3 which the policy seeks to address.	
Southland Federated Farmers of New Zealand	S126.078	SASM - Sites and Areas of Significance to Māori	SASM-P2	Oppose	The policy implies that there may be other cultural values other than what is listed in MW-2.3. However, this does not appear to be the intention as the MW chapter specifically lists and defines the cultural values. The wording should be amended to provide clarity that it is only the values listed in MW-2.3 which the policy seeks to address.	Amend SASM-P2: The impact of proposed activities on Sites of Significance to Maori as identified in the Planning Maps on the Ngāi Tahu cultural values listed in MW2.3, and their underlying relationship with the natural environment is determined in partnership with Hokonui Rūnanga.
Southland Federated Farmers of New Zealand	S126.079	ECO - Ecosystems and Indigenous Biodiversity	ECO-O1	Support in part	This objective is supported, however, the focus should be on identification of SNAs as per the NPS-IB.	Amend ECO-O1: Maintain, through the identification of SNAs , indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas).
Southland Federated Farmers of New Zealand	S126.080	ECO - Ecosystems and Indigenous Biodiversity	ECO-O2	Support	We support the recognition of the need to work with landholders to successfully identify and protect sites which meet the criteria for significant natural areas. Method Bio.3 of the Southland Regional Policy Statement requires collaboration with key stakeholder groups in addressing biodiversity issues within the region including direct (one on one) consultation with land owners whose properties contain threatened, at risk or rare habitat types. The recognition of the key role of people-in-place in managing indigenous biodiversity through both kaitiakitanga and stewardship is paramount to maintaining and improving indigenous biodiversity, as is the need to focus more widely than on managing a limited number of sites which meet the criteria for 'significance'.	Retain ECO-O2 as drafted.
Southland Federated Farmers of New Zealand	S126.081	ECO - Ecosystems and Indigenous Biodiversity	ECO-O3	Support in part	Amendments are required to this objective to ensure alignment with Policy 7 of the NPS-IB.	Amend ECO-O3: Provide for ~~appropriate~~ new subdivision, use and development within Significant Natural Areas where the values of the area can be ~~maintained and enhanced~~ avoided or managed .
Southland Federated Farmers of New Zealand	S126.082	ECO - Ecosystems and Indigenous Biodiversity	ECO-O4	Support in part	Section 7 of the RMA requires that in the protection of natural and physical resources all persons shall have particular regard to kaitiakitanga. The objective is clear and adequately addresses the matters relating to mana whenua and the ongoing or potential loss of indigenous biodiversity, whilst meeting the requirements of the Southland Regional Policy Statement. A concern that has been raised is the level of public accessibility that may be required to be provided to enable customary use. While we agree that customary use should be recognised and provided for, we caution that this should not be provided to the detriment of efficient land management by private landowners. Consideration also may need to	Amend ECO-O4: 3. 'enabling customary use upon landowner consent '

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					be given to appropriate compensation where protection / enablement of customary use comes at a cost to the landowner.	
Southland Federated Farmers of New Zealand	S126.083	ECO - Ecosystems and Indigenous Biodiversity	ECO-P1	Support	We support this policy as, again, we stress the importance of working in partnership with landowners	Retain ECO-P1 as notified.
Southland Federated Farmers of New Zealand	S126.084	ECO - Ecosystems and Indigenous Biodiversity	ECO-P2	Support in part	SFF understands the need to protect SNA's but considers that the proposed policy fails to fully acknowledge the role of landowners in achieving environmental outcomes. The plan needs to provide for minor works undertaken as part of normal farming activities to occur to ensure that landowners can continue with reasonable use of their interest in the land. It is critical to provide a pathway for maintenance, repair, replacement or minor upgrades of infrastructure and for new small scale activities integral to farm management to occur as a permitted activity even if this is located within SNA's and involves the removal of indigenous vegetation. Wording is proposed to provide clarity around the enablement of activities within a lawfully established activity.	Amend ECO-P2:– ~~Allow~~ Enable activities within Significant Natural Areas that may impact indigenous biodiversity values where: 1. This is for the maintenance and development of a lawfully established activity;
Southland Federated Farmers of New Zealand	S126.085	ECO - Ecosystems and Indigenous Biodiversity	ECO-P3	Support	SFF supports the need for provisions within the District Plan to protect SNAs from inappropriate subdivision, use and developmen	Retain ECO-P3 as notified.
Southland Federated Farmers of New Zealand	S126.086	ECO - Ecosystems and Indigenous Biodiversity	ECO-P6	Support in part	Landowners are best placed to promote restoration of indigenous biodiversity on their land.	Amend ECO-P6: Promote the restoration of indigenous biodiversity by prioritising: (...) 7. initiatives by landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity.
Southland Federated Farmers of New Zealand	S126.087	ECO - Ecosystems and Indigenous Biodiversity	ECO-P7	Support in part	The key role of landowners in the protection, enhancement and restoration of land must not be understated. Landowners must receive not only support from the Council, but also enablement in this task.	Amend ECO-P7: Protect, enhance and restore Significant Natural Areas by: (...)5. Supporting initiatives and enabling-by landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity.
Southland Federated Farmers of New Zealand	S126.088	ECO - Ecosystems and Indigenous Biodiversity	ECO-P8	Support in part	SFF supports the need for provisions within the District Plan to protect SNAs from inappropriate subdivision, use and development which recognises the existence of working pastoral farms and their contribution to the outstanding landscapes of the district. It is proposed to update the policy to apply to subdivision, use and development within an SNA, rather than preventing or limiting any subdivision, use or development within the whole District.	Amend ECO-P8: When assessing consents for subdivision, use and development within SNAs , avoid effects which will: (...)
Southland Federated Farmers of New Zealand	S126.089	ECO - Ecosystems and Indigenous Biodiversity	ECO-P9	Support in part	The proposed policy acknowledges the role of existing activities within SNA's however the Council has failed to identify aspirations of rural communities. The current policies do not provide landowners the ability to respond to changing climates, respond to technological advancements or changes in understandings around good management practice. Changes are proposed to	Include in ECO-P9: When assessing resource consents in Significant Natural Areas, consider the following matters: ... 9. The necessity for the activity to provide for the maintenance and development of existing working pastoral farms to be innovative, to respond to changing climates, markets or global conditions, or to respond to technological advancements or changes in understandings around good management practice. 10. If the resource consent application is for a lawfully established activity.

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					include development of existing pastoral farms in this policy. A nuanced approach that considers mitigation, design, and adaptive management can lead to better outcomes in terms of sustainable development, environmental stewardship, and social well-being. We believe that a more balanced and pragmatic approach is necessary to address the complexities of environmental and social challenges effectively. It is also recommended that this policy provide for lawfully established activities.	
Southland Federated Farmers of New Zealand	S126.090	ECO - Ecosystems and Indigenous Biodiversity	ECO-P10	Support in part	We fully support the establishment of the Biodiversity Stakeholder Group. It will be important for this group to provide ongoing assistance to support landowners. SFF also supports developing a biodiversity strategy and urges the council to involve stakeholders and landowners in the development of this. The Biodiversity Stakeholder Group could be tasked with the drafting of the strategy. In the development of the Council's Long-Term Plan, the Council should look to provide financial assistance or rates rebates/remission for ratepayers with identified SNAs. Farm fencing helps to protect areas of indigenous biodiversity therefore it should be specifically identified in this policy.	Amend ECO-P10: Maintain indigenous biodiversity across the district by: (...) 5. Establishing a Biodiversity Stakeholder Group to review District Plan provisions, encourage ongoing non-regulatory assistance, and ~~enhance~~ support landowners in their engagement with Council; (...) 8. Recognising the benefits of farm management practices and active management of indigenous biodiversity, including but not limited to voluntary animal and plant pest and stock control, farm fencing and/or formal legal protection.
Southland Federated Farmers of New Zealand	S126.091	ECO - Ecosystems and Indigenous Biodiversity	ECO-P11	Support in part	The provision for biodiversity offsets and clear guidance about how they may be used is appropriate to achieve the purpose of the Act. However, the policy may benefit from some clarification. It is unclear what constitutes a 'residual' adverse effect as opposed to an adverse effect, as defined in section 3 for the RMA.	Provide a definition of residual adverse effects. Amend ECO-P11: Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity on indigenous biodiversity within an SNA where: (...)
Southland Federated Farmers of New Zealand	S126.092	Interpretation	Definitions	Not Stated	ECO-p12 could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities).	Include a definition of exotic weed.
Southland Federated Farmers of New Zealand	S126.093	ECO - Ecosystems and Indigenous Biodiversity	ECO-P12	Support in part	This rule could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities)	Include a definition of exotic weed.
Southland Federated Farmers of New Zealand	S126.094	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose	Lawfully established' appears in this rule in italics, implying it is defined in the interpretations, but there is no corresponding definition in the interpretations section. ECO-R1 as currently drafted is too restrictive and will not allow for reasonable farming activities to be easily carried out. Fencing is a clear example of where the 1m width is insufficient. Another example of where the proposed width is insufficient is firebreaks, which	Include a definition for 'lawfully established' (if that is the intention) or remove italics. Amend ECO-R1: Where: 1. It is necessary for the following purposes: (a) The maintenance, repair or replacement or upgrade of existing lawfully established: (i) fences and farm fences (ii) vehicle and farm tracks; (...) (ix) network utilities and ~~the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i) and (vi).~~ (...) (e) Maintenance of improved pasture where: (i) the improved pasture has not become a mapped SNA, and (...) <i>NOTE - the 1.5m limit for vegetation clearance and land disturbance associated with fences in ECO-R1 was</i>

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					are proposed as 1.5m. Any firebreak that was only permitted 1.5m for the maintenance, repair, replacement of upgrade would not be fit for purpose. The District Plan needs permitted activities that allow clearance in line with existing farming practices, to enable people and communities to provide for their health and safety, economic, social and cultural well-being and to reflect s 5(2) of the RMA. It is important to specify that (e)(i) applies to mapped SNAs. It is our view that mapping of SNAs must occur before treating areas as SNAs. See full reason on pg 61 of submission	<i>withdrawn by Council resolution on 21 November 2023.</i>
Southland Federated Farmers of New Zealand	S126.095	ECO - Ecosystems and Indigenous Biodiversity	ECO-R2	Support in part	This rule could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities). Typo must be amended.	Amend ECO-R2: Planting of exotic weed species identified in ~~a~~ the Southland Regional Pest Management Plan.
Southland Federated Farmers of New Zealand	S126.096	ECO - Ecosystems and Indigenous Biodiversity	ECO-R3	Support in part	This rule could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities). Typo must be amended.	Include a definition for animal pests. Amend ECO-R3: The intentional release or farming of animal pests identified in ~~a~~ the Southland Regional Pest Management Plan.
Southland Federated Farmers of New Zealand	S126.097	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	We support the inclusion of a new rule which provides for indigenous vegetation clearance for any purpose other than contained in ECO-R1(1) or (3) as a permitted activity. This would capture the ability to carry out minor indigenous vegetation clearance (i.e. the clearance of a single plant) for various purposes including beautification and normal farming activities. It is unreasonable to expect landowners to apply for a resource consent when carrying out minor clearance.	Include new rule providing for indigenous vegetation clearance for any purpose other than contained in ECOR1(1) or (3) as a permitted activity.
Southland Federated Farmers of New Zealand	S126.098	NFL - Natural Features and Landscapes	NFL-O1	Support	This objective aligns with s 6(a) of the Resource Management Act 1991. SFF supports the need for provisions within the District Plan to protect ONF/Ls from inappropriate subdivision, use and development. It is considered that the plan should seek to ensure any subdivision, use and development in ONF/Ls maintains the core values which make the landscape or feature outstanding, rather than preventing or limiting any subdivision, use or development.	Amend NFL-O1: To protect the values and characteristics of the Outstanding Natural Features and Landscapes of the Gore District from inappropriate subdivision, use and development by maintaining the core values of the Outstanding Natural Feature or Landscape.
Southland Federated Farmers of New Zealand	S126.099	NFL - Natural Features and Landscapes	NFL-P1	Support	We support the practical approach adopted by this policy recognising and providing for the existing rural activities. SFF strongly supports a planning approach that recognises this principal role that landowners fulfil as managers, stewards and funders (both financially and in terms of time and effort committed) of the District's natural and	Retain NFL-P1 as notified.

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					physical resources with a long term view (often intergenerational) on how these need to be managed.	
Southland Federated Farmers of New Zealand	S126.100	NFL - Natural Features and Landscapes	NFL-P2	Support in part	The purpose of NFL-P2 is supported however we have some concerns with the interpretation of angling fisheries species. It is requested that this be updated to refer to native fish species.	Amend NFL-P2: Provide for and encourage the restoration and/or enhancement of the natural character of the Te Au Nui Pihapiha Kanakana Mataura Falls where: 1. Restoration and/or enhancement will achieve long-term improvement in natural character, landscape and associated Ngāi Tahu cultural values; and/or 2. It will assist in the restoration of indigenous biodiversity or ecosystems and angling and native fisheries species;
Southland Federated Farmers of New Zealand	S126.101	NFL - Natural Features and Landscapes	NFL-P4	Support in part	Existing activities within the ONF/L should be considered when assessing resource consents.	Amend NFL-P4: When assessing resource consents within Outstanding Natural Features and Landscapes, consider the following matters (...). The presence of existing activities within the ONF/L and whether the activity is changing in intensity, scale or character
Southland Federated Farmers of New Zealand	S126.102	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Support	A new policy could be included to ensure that exotic plants do not adversely affect the ONL/F.	If the amendments to NFL-R2 are accepted then a new policy is recommended: Avoid planting exotic tree species that would affect indigenous biodiversity values and/or are prone to wilding spread in hill and high country area.
Southland Federated Farmers of New Zealand	S126.103	NFL - Natural Features and Landscapes	NFL-R1	Support in part	SFF supports the distinction in this rule between buildings and structures for farming purposes and non-farming purposes. There should be a greater allowance permitted for farming purposes, as contained in the draft Plan. However, the total area of 30m ² limits the size significantly and it is requested this is increased. Some of the proposed ONF/L's incorporate farmland, therefore, it is important to enable structures and buildings required to support farming activities, such as mustering huts or pump stations.	Amend NFL-R1: Activity status: Permitted Where: 1. The building or structure is for farming purposes, excluding residential use; (a) Does not exceed ~~30~~ 500m² in area; (b) Height shall not exceed 83m ; 3. All buildings and structures (excluding those for farming purposes)
Southland Federated Farmers of New Zealand	S126.104	NFL - Natural Features and Landscapes	NFL-R2	Support in part	This rule should provide for the planting of nonindigenous trees under specific conditions such as for shelterbelts. The planting of shelter belts and horticultural planting are essential components of farming and should be a permitted activity. Shelterbelts are an important part of pastoral farming for livestock sheltering purposes, and also reduce the effects of wind erosion. It is considered that there would be no increased visual effects from planting exotic trees instead of indigenous trees. Shelterbelts are often planted in non-indigenous vegetation therefore we are requesting that provisions be provided for non-indigenous planting to be included in this permitted rule. As above, it is recommended to include a new policy which avoids planting exotic tree species that would affect indigenous biodiversity.	Amend NFL-R2: Activity status: Permitted Where: 1. The tree planting is of indigenous species and for restoration, conservation, or hazard prevention measures. 2. The tree planting is for the purposes of planting a shelterbelt or windbreak. (...) Matters of Discretion: 1. Effects on the values as listed in NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, ~~including those listed in MW2.3.~~ 3. Any benefits provided by the proposed tree planting.
Southland Federated Farmers of New Zealand	S126.105	NFL - Natural Features and Landscapes	NFL-R3	Support in part	SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for	Amend NFL-R3: Land disturbance and Earthworks within an identified ONF/L (excluding for the laying of stockwater, drainage or other utility pipes, or stock exclusion) Activity status: Permitted Where: 1. The depth of the earthworks shall not exceed ~~12m~~ 13m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~13m~~ 13m above the original surface of the ground; and 3. the area of the earthworks shall not exceed 100m ² in any 12 month period; and/or 4. the width of land disturbance for fencing shall not exceed 1m; and 5. the ground for fencing related land disturbance is reinstated to original levels within 48 hours of work being completed. 4. The land disturbance and

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					land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month periodSFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month period. SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month periodSFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month period. To ensure that farmers can meet these regional council requirements, land disturbance for stock exclusion (including stock water installation / upgrade to enable stock exclusion) should be excluded from this rule. Beyond stock exclusion requirements: earthworks may be required for drainage, upgrades / repairs to stock water schemes. There should not be an annual limit to this work as it is not practical to stop the work once 100m of drain / pipe has been laid. If drains / water pipe are being laid, they need to be laid to the extent of that required to complete the job.	earthworks are for the removal of shingle or stone for use on the same property to maintain tracks.

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Southland Federated Farmers of New Zealand	S126.106	NFL - Natural Features and Landscapes	NFL-R4	Support in part	The proposed permitted rule provides for the ongoing maintenance of existing roads, farm tracks, walking and cycle trails within an ONF/L, however amendments are proposed to provide greater clarity on what is permitted.	Amend NFL-R4: NFL-R4 Maintenance, repair, replace or upgrade of buildings and structures (excluding farm fences) critical infrastructure, existing roads, farm tracks, walking and cycling trails, waterway crossings, or improved pasture within an identified ONF/L.
Southland Federated Farmers of New Zealand	S126.107	NFL - Natural Features and Landscapes	NFL-R5	Support in part	Fencing is important for keeping out stock or pests from native bush and waterways, therefore provides a positive effect. SFF is unsure why the Council would limit the fencing type to only post and wire as permitted. Other types of fencing, such as post and rail or waratah fencing, require a resource consent as currently drafted. It is our view that farmers should not have to apply for a resource consent where fencing is for the purposes of keeping out stock or pests. Such a requirement will impact on farmers' ability to carry out day-to-to farming operations. We have made earlier comments on the definition of fencing, to ensure that all types of fences are included We have proposed a new definition for 'farm fences' and it is crucial this is adopted to ensure NFL-R5 achieves the intended purpose.	Amend NFL-R5: Activity status: Permitted Where: 1. The fence is a farm fence ~~Note: fences are a structure and therefore subject to the river setback rules.~~ ~~Activity Status where compliance is not achieved: Restricted discretionary~~ ~~Matters of discretion: 1. Effects on the values listed within NFL APP Appendix 5.2. Impacts on Ngāi Tahu cultural values, including those listed in MW 2.3.~~
Southland Federated Farmers of New Zealand	S126.108	NFL - Natural Features and Landscapes	NFL-R6	Oppose	SFF request this rule is deleted as it duplicates ECO-R1.	Delete NFL-R6
Southland Federated Farmers of New Zealand	S126.109	NFL - Natural Features and Landscapes	NFL-R6	Oppose	SFF assume this rule should be NFL-R7. However, if NFL-R6 (above) is deleted then this rule will remain NFL-R6. It is important for farmers to be able to develop/erect farm fences, new roads/farm tracks when needed. Such reasons could include supporting the safe transfer of animals, changes to landscape caused by extreme weather and health and safety. We do not agree with this being a restricted discretionary activity and request this is changed to permitted.	Amend NFL-R6: ~~7: New Roads, farm fences, farm tracks, walking and cycling tracks within an identified ONF/L Activity status: Restricted Discretionary~~ Permitted ~~Matters of discretion: 1. Effects on the values as listed within NFL APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW 2.3. 3. The necessity of what is proposed and any alternatives. 4. Mitigation measures proposed.~~
Southland Federated Farmers of New Zealand	S126.110	NFL - Natural Features and Landscapes	NFL-R7	Oppose	Mineral extraction activities, other than farm quarries, should be a discretionary activity except in specific ONLs where mineral extraction is identified as not compatible with maintaining outstanding landscape values.	Change activity status: Mining and Quarrying within an identified ONF/L Activity status: ~~Non-complying Discretionary~~ Activity status where compliance is not achieved: N/A
Southland Federated Farmers of New Zealand	S126.111	PA - Public Access	PA-O1	Support in part	The District Plan needs to be clear that access is not available across private land unless with permission from the landowner. The landowner should not be compelled by the District Plan to always provide access.	Amend PA-O1: Public access, when approved by a landowner , is provided to and along waterbodies with high recreational, scenic, Ngāi Tahu cultural or amenity values.
Southland Federated Farmers of New Zealand	S126.112	PA - Public Access	PA-O3	Support in part	This objective needs to include recognition that this access should not result in adverse effects on the rights of private property owners. Many rural landowners, particularly riparian margin landowners, have had encounters with unwelcome trespassers, some with dogs, that are disruptive to their farming operations, put themselves into dangerous situations, or create nuisance effects like littering or human waste. It may also be	Amend PA-O3: Public access does not result in adverse effects on natural character, indigenous biodiversity, historic heritage, cultural, landscape values, ~~or~~ healthy and safety, or the rights of landowners.

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					appropriate to limit access across private property during certain periods - for example when this will be unsafe or will disrupt farming activities, such as when tree felling or earthmoving is occurring, or during harvest or lambing; and there may be areas that are simply not appropriate to allow public access into at any time due to safety or other considerations.	
Southland Federated Farmers of New Zealand	S126.113	PA - Public Access	PA-P2	Oppose	SFF does not support the creation of esplanade reserves or strips where land is being subdivided for the purpose of facilitating farming in the Rural Zone. Creation of public access alongside farmland encourages problems for farmers, including theft of farm property and stock, and harassment/harm of farm animals. Such access should require landowner permission and be at their discretion.	Amend PA-P2: Maintain and enhance public access by: 1.requiring for urban areas through the subdivision process the provision of esplanade reserves and/or esplanade strips along waterbodies, ~~particularly in urban areas~~ and along public access corridors.
Southland Federated Farmers of New Zealand	S126.114	PA - Public Access	PA-Additional provisions sought	Support	A new policy is needed for education of the public as to where public access is available, and where landowner permission is required. The District Plan maps multiple categories that plan users may believe are freely available for public access, like SNAs, ONF/Ls, and waterways, yet many of these are on private land and access is only by the permission of the landowner. We do not want users of the District Plan to think they can wander over private land at will. Sometimes private land will extend right down to the water or further, depending on the Certificate of Title. Sometimes esplanade reserves will not be continuous but be interspersed with private land. Both situations might mean that the public will want to cross private land, and must understand where public access is available and where landowner permission is needed	Include new policy
Southland Federated Farmers of New Zealand	S126.115	SUB - Subdivision	SUB-O4	Oppose in part	The Council must state a commitment to recognize and protect highly productive land.	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.
Southland Federated Farmers of New Zealand	S126.116	SUB - Subdivision	SUB-O5	Support in part	This objective should give effect to the purposes of esplanade reserve and esplanade strips as per s 229 of the Resource Management Act 1991. It is our view that public access requires landowner consent therefore the provision of public access in this objective should be removed.	Amend SUB-O5: Esplanade reserves and strips are created through subdivision for the purposes stated in section 229 of the Resource Management Act 1991. ~~to contribute to the protection of ecological values and cultural values, provide natural hazard mitigation, and provide for public access to and along rivers~~
Southland Federated Farmers of New Zealand	S126.117	SUB - Subdivision	SUB-P8	Support	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Retain SUP-P8 as drafted.
Southland Federated Farmers of New Zealand	S126.118	SUB - Subdivision	SUB-P13	Support in part	SFF fully supports the protection this policy gives to rural land and high value soils but the Council must state a commitment to also preserve high value soils.	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.
Southland Federated Farmers of New Zealand	S126.119	SUB - Subdivision	SUB-R5	Support	SFF supports the inclusion of reverse sensitivity as a matter of discretion, as per the s 32 report:	Retain SUB-R5 as drafted.

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					'reserve sensitivity is a matter of discretion for subdivisions' (p.31).	
Southland Federated Farmers of New Zealand	S126.120	SUB - Subdivision	SUB-S1	Support in part	SFF supports increasing the minimum lot size in the rural zone to 8ha. In the interests of protecting highly productive land and ensuring that the district maintains suitably sized working farms, 8ha is a reasonable minimum lot size for the rural zone. We agree with the s 32 report which states that the current 2ha minimum lot size could result in 'the loss of highly productive land and farmland available for primary production'.	Retain SUB-S1 as drafted.
Southland Federated Farmers of New Zealand	S126.121	EW - Earthworks	EW-P1	Support	Support is given for recognising the role (purpose) and character of a zone and the earthworks within it, meaning farming related earthworks in the rural zone should be considered appropriate and acceptable. While being in character with the surrounding land, the functionality of the earthworks is also important. Earthworks for farm tracking needs to be functional to allow safe passage across steep terrain. Visual effects must not take precedence over functionality.	Retain EW-P1 as notified.
Southland Federated Farmers of New Zealand	S126.122	EW - Earthworks	EW-R1	Oppose	SFF finds this rule unnecessarily restrictive and is unsure why the Council is taking this approach to restrict fencing when the s 32 report provides no rationale. EW-R1 is inconsistent with rules elsewhere in the PDP, such as the NFL chapter. SFF suggest amendments to this rule which will allow farmers the ability to carry out land disturbance as required for fencing. Imposing restrictions on this, and therefore forcing farmers to apply for a resource consent, will disrupt farming operations.	Amend EW-R1 as below or exclude farm fences from this rule Land disturbance for the construction of fences Activity status: Permitted Where: ~~1. Any land disturbance does not exceed: (a) 1 metre in width for more than 10 metres in any 100 metre length; and/or (b) 1 metre in height or depth; and 2. The ground is reinstated to original levels within 48 hours of work being completed.~~ 3. The works are undertaken in accordance with Earthworks Standards EW-S3, EW-S5 and EW-S7. No other Earthworks Standards apply.
Southland Federated Farmers of New Zealand	S126.123	EW - Earthworks	EW-R7	Support	Support is given for digging of dead holes and farm rubbish pits being a permitted activity	Retain EW-R7 as notified.
Southland Federated Farmers of New Zealand	S126.124	EW - Earthworks	EW-R8	Support	Support is given for earthworks for sileage pits being a permitted activity.	Retain EW-R8 as notified.
Southland Federated Farmers of New Zealand	S126.125	EW - Earthworks	EW-S3	Oppose	SFF appreciates the need for some setbacks from rivers and streams for earthworks. However, as currently drafted, EW-S3 would limit earthworks for fencing which may be required for stock exclusion, drainage, including around waterways e.g. putting in drains, maintaining drains, replacing a culvert and pest control.	Amend EW-S3: Setbacks from rivers and streams 1. Earthworks (excluding earthworks required for farm fencing for stock exclusion, drainage, including around waterways or pest control) shall be set back the minimum distances from the top of the closest bank of a river or stream as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and 4); and (c) 5m for low order rivers or streams (order 1 and 2). Refer to Appendix 3 for river and stream orders
Southland Federated Farmers of New Zealand	S126.126	LIGHT - Light	LIGHT-Overview	Support in part	The overview should also acknowledge that rural production is enabled by artificial outdoor lighting	Amend the Overview : Artificial outdoor lighting enables work, rural production , recreation and entertainment activities to occur beyond normal daylight hours.
Southland Federated Farmers of New Zealand	S126.128	LIGHT - Light	LIGHT-O1	Support	Support is given to this objective which acknowledges activities can have a functional and operational requirement to use artificial light	Retain LIGHT-O1 as notified.
Southland Federated Farmers of New Zealand	S126.129	LIGHT - Light	LIGHT-O2	Support in part	Objective O2 needs to consider the functional and operational requirements of primary production activities that need artificial light for normal seasonal tasks. Artificial outdoor lighting is crucial	Amend LIGHT-O2: Artificial outdoor lighting is located, designed and operated to maintain the character and amenity values within zones, including the enablement of rural production , and so that it does not adversely affect the health and safety of people, the natural life cycles of indigenous species and the safe operation of the transport network

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					for some primary production activities (especially over the winter months when daylight hours are short - 8.5 hours).	and views of the night sky.
Southland Federated Farmers of New Zealand	S126.130	LIGHT - Light	LIGHT-Additional provisions sought	Not Stated	SFF believes the Council must also recognise and provide for the needs of its rural and/or primary production industry. There will be some parts of the year where farmers must work well past normal working hours to process their goods.	Include a policy that recognises and enables certain rural and primary activities may require artificial outdoor lighting outside normal working hours, under certain conditions, in order for its rural community to thrive in the District.
Southland Federated Farmers of New Zealand	S126.131	NOISE - Noise	NOISE-O1	Support	This objective identifies that within different zones, different levels of noise will be appropriate.	Retain NOISE-O1 as notified.
Southland Federated Farmers of New Zealand	S126.132	NOISE - Noise	NOISE-O2	Support in part	Noise is an inherent part of rural activities, particularly in the rural zones. However, this objective does not anticipate the reverse sensitivity effects that may occur to adjacent zones, or to residential sites within the rural zones.	Amend NOISE-O2: Outside of reverse sensitivity exclusions in NOISE-O3 , activities do not generate noise effects which adversely affect amenity values, the health and wellbeing of people and communities.
Southland Federated Farmers of New Zealand	S126.133	NOISE - Noise	NOISE-P2	Support in part	The RMA states a duty to avoid, remedy or mitigate adverse effects on the environment from activities. As such, the wording in NOISE-P2 should be updated to reflect this	Amend NOISE-P2: Ensure the health and wellbeing of people and the community is not adversely affected ~~protected~~ by (...)
Southland Federated Farmers of New Zealand	S126.134	NOISE - Noise	NOISE - General	Support	NCFF supports Note 2: #9 which provides for an exemption for agriculture, horticulture and pastoral farming activities. However, it is suggested that audible bird scaring device' is included here, and a corresponding definition included.	Amend NOISE-Note 2 #9: 9. Noise from vehicles, machinery or equipment undertaking agricultural, horticultural and pastoral activities including noise from stock, other outdoor animals and working dogs, and audible bird scaring devices but excluding noise from stationary processing activities.
Southland Federated Farmers of New Zealand	S126.135	Interpretation	Definitions	Support	With regards to Noise- Note 2; NCFF supports 'audible bird scaring device' being defined	Include a definition for 'audible bird scaring device' as: ' Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds '
Southland Federated Farmers of New Zealand	S126.136	NOISE - Noise	NOISE-R8	Oppose	SFF seeks to have the Plan provide for the intermittent use of rural airstrips and helicopter landing areas for the purposes of agricultural aviation including primary production and conservation purposes as a permitted activity without limitations. This is the approach of the Selwyn District Council in their partially operation Selwyn District Plan. The existing District Plan does not specifically limit agricultural aviation, with it being covered by an exemption to the noise rules in 4.5.1 (2) (c) "activities of normal primary production or forestry activities" It is important to note that some agricultural aviation is in response to pests in crops and therefore the activity takes place with very little notice. Fertiliser spreading activities need to take place in appropriate weather windows which can be unpredictable. Timing is also important for some spays to avoid negative impacts to bees.	Amend NOISE-R8: Activity status: Permitted ~~Where: 1. The take-off and landing is to and from a rural airstrip, a helicopter landing area located in the rural environment, or the Mandeville Aviation and Rail Precinct; 2. Take off and landings do not occur for more 315 hours in any 12 month period; 3. The rural airstrip or helicopter landing area is separated by at least 500m from any notional boundary on a site not being serviced by the use of the airstrip; and 4. A record of take offs and landing times and dates is maintained and available to the Council upon request.~~
Southland Federated Farmers of New Zealand	S126.137	SIGN - Signs	SIGN-Overview	Support in part	Signage can be used to identify farms in rural areas but does not necessarily advertise these businesses. An example is a dairy farm where signage is needed for tankers to identify the farm.	Amend overview: Signs contribute to the social, cultural, and economic well-being of the District by providing community, consumer, and destination information, safety messages, traffic controls, and the opportunity to advertise and identify businesses, products and services. Signage is an accepted part of the urban environment.

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Southland Federated Farmers of New Zealand	S126.138	SIGN - Signs	SIGN-S4	Oppose in part	Multiple signs are often in place on farms and may include security signage, health and safety signage, signage directing tankers and biosecurity signage.	Amend SIGN-S4: General Rural Zone 1. Any sign must: (a) be setback at least 1.5m from the road boundary; and (b) be at least 2.6 metres above the level of ground beneath the sign. 2. The sign must not be placed within 15m of any existing directional sign, where adjacent to and visible from a road reserve; 3. Maximum number of signs per site: five ~~one;—~~ (...)
Southland Federated Farmers of New Zealand	S126.139	TEMP - Temporary Activities	TEMP-R3	Support	TEMP-R3 does not cover storage or stacking of goods for farming purposes.	Amend TEMP-R3 to include cover storage or stacking of goods for farming purposes.
Southland Federated Farmers of New Zealand	S126.140	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Support in part	In the Gore District, there are farmers whose families have been farming the land for many generations. They value their land and have developed an intergenerational culture which must be preserved alongside other cultural and historical aspects identified in the District Plan as of importance. SFF believes that heritage resources help to teach us about the past and the cultures of those who came before us, but we note that this seldomly appropriately reflects rural or pastoral heritage and culture as 'valued'. There is an opportunity as part of this process to celebrate the district's rural heritage and the history of our early pioneering farmers.	Amend Overview and Purpose: The purpose of the General Rural Zone is to provide for and protect rural production activities and other activities that rely on the rural resource. The General Rural Zone is the largest zone in the District and this land resource underpins the economic, ~~and~~ social and cultural well-being of the District.
Southland Federated Farmers of New Zealand	S126.141	GRUZ - General Rural Zone	GRUZ-O1	Support in part	There is no objective that specifically enables rural production activities in the rural zones. There should be recognition of activities that are ancillary to primary production so that activities such as agricultural aviation are provided for. It is important to both 'recognise and provide for' activities. Cultural well-being is an important part of farmers' well-being as detailed in the comments on the overview.	Amend GRUZ-O1: Enable , recognise and provide for the importance of primary production, ancillary activities and rural industry to the social, ~~and~~ economic and cultural well-being of the District.
Southland Federated Farmers of New Zealand	S126.142	GRUZ - General Rural Zone	GRUZ-O2	Support in part	Specific recognition of the impacts on primary production activities should be provided for.	Amend GRUZ-O2: The character and qualities of the General Rural zone comprise (...)4. high levels of rural amenity, including smells, noise and dust from ~~adjacent sites.~~ primary production activities.
Southland Federated Farmers of New Zealand	S126.143	GRUZ - General Rural Zone	GRUZ-O3	Support	Non-primary production activities within the GRUZ are often important to farmers' social and economic well-being.	Retain GRUZ-O3 as notified.
Southland Federated Farmers of New Zealand	S126.144	GRUZ - General Rural Zone	GRUZ-O4	Support	SFF supports the preservation of the purpose and character of the GRUZ.	Retain GRUZ-O4 as notified.
Southland Federated Farmers of New Zealand	S126.145	GRUZ - General Rural Zone	GRUZ-O5	Support in part	It is important to acknowledge the importance of highly productive land for primary production for both current and future generations. The protection of highly productive land is crucial for ensuring economic well-being. The purpose of the Resource Management Act 1991 refers to well-being of 'future generations' (s 5), however the Local Government Act 2002 discusses 'current and future well-being' and enabling the promotion of the four well-being's of communities 'in the present and for the future' (s 10).	Amend GRUZ-O5:The value and long-term benefits of using highly productive land for primary production is recognised and the availability of highly productive land for primary production for current and future generations is protected.

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Southland Federated Farmers of New Zealand	S126.146	GRUZ - General Rural Zone	GRUZ-P1	Support	It is important for the district's social, cultural and economic well-being that primary production activities are enabled and supported.	Retain GRUZ-P1 as notified.
Southland Federated Farmers of New Zealand	S126.147	GRUZ - General Rural Zone	GRUZ-P2	Support	It is appropriate to include a separate policy enabling rural industry activities.	Retain GRUZ-P2 as notified.
Southland Federated Farmers of New Zealand	S126.148	GRUZ - General Rural Zone	GRUZ-P4	Support	It is important to recognise activities which provide benefits in the rural environment.	Retain GRUZ-P4 as notified.
Southland Federated Farmers of New Zealand	S126.149	GRUZ - General Rural Zone	GRUZ-P5	Support	It is important to recognise the benefits of quarrying and mining, and their enablement in the rural environment.	Retain GRUZ-P5 as notified.
Southland Federated Farmers of New Zealand	S126.150	GRUZ - General Rural Zone	GRUZ-P6	Support	SFF supports this policy.	Retain GRUZ-P6 as notified.
Southland Federated Farmers of New Zealand	S126.151	GRUZ - General Rural Zone	GRUZ-P7	Support in part	SFF support the enablement of agricultural aviation activities and acknowledge the potential reverse sensitivity effects. However, as stated in comments on the NOISE chapter, SFF do not support limitations on agricultural aviation activities.	Amend GRUZ-P7: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities., whilst managing the noise effects through controlling the location of airstrips and scale of their use.
Southland Federated Farmers of New Zealand	S126.152	GRUZ - General Rural Zone	GRUZ-P8	Support in part	'Rural production' as a term is not defined therefore it is recommended that 'primary production' is used for clarity. For farmers, it is important that some residential activity be permitted in the GRUZ for housing purposes (i.e., multiple dwellings provided for staff accommodation). However, it is crucial that primary production is still enabled and not compromised by development. Number 5 of this policy does not make sense as it is currently written and needs to be rephrased or removed, and a new policy created.	Amend GRUZ-P8: Enable residential activity where it: 1. does not compromise rural primary production; 2. is of a scale and location that does not compromise the rural character from any property or public place; and 3. can be suitably serviced, including provision for telecommunications; and 4. does not amount to rural lifestyle or urban development; and 5. reverse sensitivity effects on and of adjacent land uses are appropriately avoided or mitigated. Alternatively, include as a new policy GRUZ-P9: Reverse sensitivity effects on and of adjacent land uses are appropriately avoided or mitigated.
Southland Federated Farmers of New Zealand	S126.153	GRUZ - General Rural Zone	GRUZ-P9	Support	It is important to provide for non-rural activities in the rural sector where these activities are related to, support or are compatible with rural activities.	Retain GRUZ-P9 as notified.
Southland Federated Farmers of New Zealand	S126.154	GRUZ - General Rural Zone	GRUZ-P10	Support	Protection of highly productive land is supported.	Retain GRUZ-P10 as notified.
Southland Federated Farmers of New Zealand	S126.155	GRUZ - General Rural Zone	GRUZ-P11	Support	SFF supports this policy as it ensures activities incompatible with the GRUZ are avoided, unless a clear need exists.	Retain GRUZ-P11 as notified.
Southland Federated Farmers of New Zealand	S126.156	GRUZ - General Rural Zone	GRUZ-R3	Oppose in part	Under 3.9(1)(a) of the NPS-HPL, use or development of highly productive land is provided for unless at least one of the criteria listed under this clause is provided for. 'Supporting activities' is one such criteria, therefore quarrying activities for an existing farm quarry should be permitted	Amend GRUZ-R3: Activity status: Permitted Where (...) 3. The activity is not located on Highly Productive Land unless existing use rights apply ; and 4. The area is progressively stabilised, filled or recontoured; and (...))
Southland Federated Farmers of New Zealand	S126.157	GRUZ - General Rural Zone	GRUZ-R5	Support	SFF supports this rule as it provides for woodlots as a permitted activity.	Retain GRUZ-R5 as notified.
Southland Federated Farmers of New Zealand	S126.158	GRUZ - General Rural Zone	GRUZ-R9	Oppose in part	SFF does not believe the Council should restrict the staff numbers and hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule	Amend GRUZ-R9: 1. The activity is a: (a) Vet Clinic, or (b) plant nursery, or (c) sale of on-site produce, or (d) Animal Boarding Activity; and ~~2. Hours of operation for people visiting the site are between 0700 and 1900; and 3. A maximum of 12 staff are on site at any one~~

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					is unnecessary. As an example, a vet clinic may be required to operate outside of the hours of 0700 and 1900 due to an animal requiring care. There may be instances where a greater number of staff are required, for example an animal boarding facility during a busy period. These rules are over regulatory.	~~time;~~
Southland Federated Farmers of New Zealand	S126.159	GRUZ - General Rural Zone	GRUZ-R10	Oppose in part	SFF does not believe the Council should restrict the staff numbers and hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule is unnecessary. An example is education/training for milking cows, would occur outside of the proposed hours of operation in the PDP.	Amend GRUZ-R10: Where: 1. The activity is a rural based education facility centred on agriculture sector training; and ~~2. Hours of operation are between 0700 and 1900; and 3. A maximum of 12 people (staff and students) on site at any one time;~~
Southland Federated Farmers of New Zealand	S126.160	GRUZ - General Rural Zone	GRUZ-R12	Oppose in part	SFF does not believe the Council should restrict the hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule is unnecessary. A home business may operate at any hour of the day, as is the nature of online businesses with international networks/customers. Furthermore, it is unnecessary to limit the time in which vehicles may be loaded or unloaded for a home businesses in a rural environment where disturbance is unlikely. This rule is over regulatory.	Amend GRUZ-R12 to remove: ~~3. Hours of operation are limited to between the hours 0700 and 1900; and 4. Unloading or loading of vehicles or the receiving of customers or deliveries only occur between the 0700 and 1900.~~
Southland Federated Farmers of New Zealand	S126.161	GRUZ - General Rural Zone	GRUZ-S1	Support in part	Primary production farms require multiple dwellings for staff accommodation often in close proximity to each other. Larger farms may have several individual minor residential units within close proximity. In farm succession situations, it is common for two generations to live in close proximity on the same site. SFF appreciates that controls are required for density but the standards also need to allow for additional support accommodation/housing. Additional residential units or minor residential units is a matter of discretion under this standard. However, it must be acknowledged that additional units may not always be required to support primary production as these could be required to house additional family members or live in staff (for example an Au Pair).	Amend GRUZ-S1: 3. There shall be a maximum density of ~~one~~ three minor residential units per site Matters of discretion: 1. The necessity of the additional residential unit or minor residential unit. ~~to support primary production.~~
Southland Federated Farmers of New Zealand	S126.162	GRUZ - General Rural Zone	GRUZ-S4	Oppose in part	SFF requests an amendment to reduce the setback for buildings greater than 500 square metres. Buildings of this size are likely used for primary production and as such a 200m setback is unreasonable.	Amend GRUZ-S4: Any building is setback from any side or rear boundary the minimum distances as follows: 1. Residential buildings are setback 30m; 2. Dairy sheds and buildings that house animals are setback 50m; 3. Buildings greater than 500 square metres are setback ~~200~~ 50m , except for in the Rural Industry Precinct (PREC13) where the setback is 100m; 4. Buildings less than 10 square metres are setback 2m; and/or 5. All other buildings are setback 15m.
Southland Federated Farmers of New Zealand	S126.163	GRUZ - General Rural Zone	GRUZ-S5	Oppose in part	SFF supports this standard but requests an update from the boundary of an intergenerational connector road.	Amend GRUZ-S5: Any building or structure is setback from any road boundary the minimum distances as follows: 1. Residential buildings are setback: (a) ~~100~~ 50m from the boundary of an Interregional Connector road (state highway); (b) 40m from the boundary of a Rural Connector road; (c) 30m from the road boundary of an unsealed road; and (...)

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Southland Federated Farmers of New Zealand	S126.164	GRUZ - General Rural Zone	GRUZ-S7	Oppose in part	As per earlier comments, farm fences must be excluded from setbacks.	Amend GRUZ-S7: 1. Any building or structure (not including farm fences) is set back from the top of the closest bank of any stream or river the minimum distance as follows:
Southland Federated Farmers of New Zealand	S126.165	GRUZ - General Rural Zone	GRUZ-S8	Oppose	Generally, SFF does not support the inclusion of GRUZ-S8 Height. It may be useful for urban developments, where houses are clustered together, but it is not an appropriate or necessary measure in the rural zone.	Remove this standard or increase the maximum height across the entire Rural Zone to 15m.
Southland Federated Farmers of New Zealand	S126.166	RLZ - Rural Lifestyle Zone	RLZ-Overview and Purpose	Support in part	SFF supports reference to ensuring that primary production activities can continue in the RLZ given the potential for reverse sensitivity in this area. However, the reference to 'sustainable' primary production is not needed and could change the meaning of 'primary production' activities (which are defined in the interpretation section). A key word search determined that this chapter is the only chapter in the plan referring to 'sustainable primary production' therefore we seek its removal. There is a typography issue that needs to be amended.	Amend Overview: The Rural Lifestyle Zone facilitates the aspirations of those wish to live there, within a setting that retains the overall rural character, while ensuring that ~~sustainable~~ primary production activities are not compromised. The precinct sits within the wider landscape setting of the Hokonui Hills Outstanding Natural Landscape, and the Croydon Bush Scenic Reserve, which also have landscape and biodiversity values.
Southland Federated Farmers of New Zealand	S126.167	RLZ - Rural Lifestyle Zone	RLZ-O2	Support in part	We suggest this objective is reworded as the intention is not clear.	Reword RLZ-O2.
Southland Federated Farmers of New Zealand	S126.168	RLZ - Rural Lifestyle Zone	RLZ-P3	Support in part	If activities are not compatible with the amenity and value of the zone then consent will not be granted, therefore it seems unnecessary to state this here. Furthermore, RLZ-P4 provides for 'compatible activities'.	Amend RLZ-P3: Enable primary production activities within the Rural Lifestyle Zone. ~~where they are compatible with the amenity and values of those zones.~~
Southland Federated Farmers of New Zealand	S126.169	RLZ - Rural Lifestyle Zone	RLZ-P6	Support in part	Emergency service facilities, such as rural fire, are crucial for farmers and therefore the Plan should do more than to simply 'recognise the benefit'.	Amend RLZ-P6: ~~Recognise the benefit~~ Enable the location of emergency services facilities and of education facilities, whilst ensuring any such facility is of a location, nature and scale that does not detract from the rural character and amenity values of the Rural Lifestyle area.
Southland Federated Farmers of New Zealand	S126.170	RLZ - Rural Lifestyle Zone	RLZ-P9	Support in part	The word 'generally' does not add value to this policy. Farms located in the RLZ must be enabled to continue normal farming operations.	Amend RLZ-P9: Recognise that some Rural Lifestyle Zoned sites are working farms, and activities such as primary production and agriculture aviation activities are ~~generally~~ appropriate.
Southland Federated Farmers of New Zealand	S126.171	RLZ - Rural Lifestyle Zone	RLZ-PREC11-P1	Support in part	Typo to be amended.	Amend RLZ-PREC11-P1L: Limited the nature, scale and design of development within PREC11 in order to protect the landscape values of the Hokonui Hills Rural Lifestyle Precinct and the nearby Hokonui Hills Outstanding Natural Landscape and Croydon Bush Scenic Reserve from inappropriate development
Southland Federated Farmers of New Zealand	S126.172	RLZ - Rural Lifestyle Zone	RLZ-R3	Support in part	The maximum occupancy prescribed by this rule is 5 persons. This is overly restrictive as a homestay in a rural environment is unlikely to cause adverse effects. Furthermore, 5 persons is an odd number as it does not allow for multiple couples. Farmstays may offer a homestay as part of their business and this rule must accommodate for this. If a fourbedroom hours is utilised as a homestay there could be three bedrooms available, sleeping six people. Allowing for eight people would adequately capture a farmstay.	Amend RLZ-R3: 3. The maximum occupancy does not exceed ~~5~~ 8 persons.

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Southland Federated Farmers of New Zealand	S126.173	RLZ - Rural Lifestyle Zone	RLZ-R5	Support in part	This rule permits primary production where the activity does not involve: (a) intensive indoor primary production, or (b) milking sheds, or (c) buildings used to house or feed milk stock, or (d) stock effluent holding tanks, or (e) treatment or storage ponds, or (f) winter grazing, or (g) quarry or quarrying activities, or (h) mining. SFF agrees with this list as it is important to minimise reverse sensitivity effects, however protecting existing use is also important and therefore the Council should add this as a matter of discretion. 'Winter grazing' as a term is not defined and does not provide for people in the RLZ having a couple of animals such as sheep for grazing. It is recommended that a definition for 'intensive winter grazing' is included to align with the Southland Land and Water Plan.	Amend RLZ-R5: Primary Production Activity status: Permitted Where: (...) (e) treatment or storage ponds, or (f) intensive winter grazing, or (g) quarry or quarrying activities, or (...) Matters of discretion: 1. The matters of discretion of any infringed standard 2. Existing use rights
Southland Federated Farmers of New Zealand	S126.174	RLZ - Rural Lifestyle Zone	RLZ-R6	Support in part	We support this rule provided our changes under GRUZ-S8 are accepted.	Adopt RLZ-R6 as notified, pertaining to changes being accepted under GRUZS8.
Southland Federated Farmers of New Zealand	S126.175	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Southland Federated Farmers of New Zealand	S126.176	Natural environmental Values map layers	ECO-MAP-Significant Natural Area	Not Stated	The definition of a SNA as per the NPS-IB states 'any area that, after the commencement date, is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1'. Therefore, until the identification is carried out notification or inclusion in the plan takes place, the unmapped areas should not be treated as SNAs. In the development of the Council's Long-Term Plan, the Council should look to provide financial assistance or rates rebates/remission for ratepayers with identified SNAs. We support nonregulatory approaches to managing SNAs and would be happy to work with the Council and our members to achieve thisThere is a real risk of a perverse effect that SNAs will become something farmers are motivated to avoid having on their property. For instance, if there are significant costs and restrictions associated with SNAs, they will become a liability instead of something to be proud of. This will have implications for biodiversity, and farmers may	SFF does not agree with including areas that have not been mapped as SNAs. It is our view that until areas are mapped and included in the plan, they should not be considered SNAs.

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					choose to plant exotic species for artificial wetlands, shelterbelts or stock shade trees etc, which encourage a habitat for non-indigenous fauna, instead of being encouraged to choose indigenous species.	
Southland Federated Farmers of New Zealand	S126.177	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Not Stated	Lack of consultation on the Ecosystems and Indigenous Biodiversity chapter and the Natural Features and Landscapes chapters	We note that the Council did not include these chapters in the early consultation on the exposure draft. We believe these chapters need to be removed and rewritten with a more practical and enabling approach
Southland Federated Farmers of New Zealand	S126.178	NFL - Natural Features and Landscapes	NFL - General	Not Stated	Lack of consultation on the Ecosystems and Indigenous Biodiversity chapter and the Natural Features and Landscapes chapters	We note that the Council did not include these chapters in the early consultation on the exposure draft. We believe these chapters need to be removed and rewritten with a more practical and enabling approach
Southland Federated Farmers of New Zealand	S126.179	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Southland Federated Farmers of New Zealand	S126.180	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Southland Federated Farmers of New Zealand	S126.181	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being
Southland Federated Farmers of New Zealand	S126.182	Interpretation	quarrying activities	Support in part	Although there is a separate definition for farm quarries, they need to be clearly excluded from the definition of 'quarrying activities'.	Amend definition to include below and make any consequential amendments: This definition does not include 'farm quarries'.
Southland Federated Farmers of New Zealand	S126.183	NOISE - Noise	NOISE-P4	Support in part	Aviation activities that are infrequent should be added to the list of activities in NOISE-P4 so that there is recognition that such activities are provided for.	Amend NOISE-P4:Enable the infrequent noise levels associated with temporary activities, temporary aviation activities , temporary military training activities and emergency services training activities provided that the level, timing and duration of noise is reasonable.
Southland Federated Farmers of New Zealand	S126.184	GRUZ - General Rural Zone	GRUZ-R11	Oppose in part	The maximum occupancy prescribed by this rule is 5 persons. This is overly restrictive as a homestay in a rural environment is unlikely to cause adverse effects. Furthermore, 5 persons is an odd number as it does not allow for multiple couples. Farmstays may offer a homestay as part of their business and this rule must accommodate for this. If a four bedroom house is utilised as a homestay there could be three bedrooms available, sleeping six	Amend GRUZ-R11:2. The maximum occupancy does not exceed ~~5~~ 8 persons.

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					people. Allowing for eight people would adequately capture a farmstay.	
Spark New Zealand Trading Limited	S154.001	Interpretation	critical infrastructure	Support in part	Requests the Telecommunications Act 2001 definition of telecommunication be added to the definition of critical infrastructure.	Include telecommunications as a defined term as 'telecommunications as means the conveyance by electromagnetic means from one device to another of any encrypted or non-encrypted sign, signal, impulse, writing, image, sound, instruction, information, or intelligence of any nature, whether for the information of any person using the device or not'.
Spark New Zealand Trading Limited	S154.002	Interpretation	functional need	Support	The definition of functional need is supported.	Retain as notified
Spark New Zealand Trading Limited	S154.003	Interpretation	infrastructure	Support	The definition of infrastructure is supported.	Retain as notified
Spark New Zealand Trading Limited	S154.004	Interpretation	network utilities	Support	Definition of network utilities is supported..	Retain as notified
Spark New Zealand Trading Limited	S154.005	Interpretation	network utility operator	Support	Definition of network utility operator is supported	Retain as notified
Spark New Zealand Trading Limited	S154.006	Interpretation	operational need	Support	The definition of 'Operational Need is supported	Retain as notified
Spark New Zealand Trading Limited	S154.007	Interpretation	reverse sensitivity	Support	The definition of reverse sensitivity is supported	Retain as notified
Spark New Zealand Trading Limited	S154.008	Interpretation	Definitions	Support in part	A definition of mast is needed to understand how it is different from a pole	Add a definition for Mast
Spark New Zealand Trading Limited	S154.009	Interpretation	Definitions	Support in part	Rule INFR-R3 refers to support poles and Rule INFRR4 refers to support structures. A definition of each, or a rationalization between the two terms is necessary to understand what they mean	Provide a definition for support poles and support structures
Spark New Zealand Trading Limited	S154.010	Interpretation	Definitions	Support in part	Telecommunications terms in the PDP defined under the RMA (being the NESTF). It needs to made clear that the PDP adopts the same definition.	Cross reference to NESTF or provide definitions for Ancillary Equipment, Antenna, Cabinet, Pole and Small Cell Unit
Spark New Zealand Trading Limited	S154.011	INFR - Infrastructure	INFR-Overview	Support in part	For consistency between what para. 2 states infrastructure is and the definition in the PDP	In the second paragraph, update the word communication to telecommunication and radio communication.
Spark New Zealand Trading Limited	S154.012	INFR - Infrastructure	INFR-Overview	Support in part	Unclear how rules in the infrastructure chapter are to be applied. Under the NPS 'all provisions relating to...infrastructure that are not specific to the special purpose zone chapter or sections must be located in one or more chapters under the Energy, Infrastructure and Transport Heading'	Add a paragraph explaining how the infrastructure chapter interacts with other chapters of the DP noting that it is a standalone chapter and there are no rules in any other chapter which apply to the activities regulated under the INFR chapter.
Spark New Zealand Trading Limited	S154.013	INFR - Infrastructure	INFR-O1	Oppose in part	The scope of INFR-O1 should be widened to fully recognize what critical infrastructure needs to achieve.	Amend INFR-O1 as follows: ~~The operation, maintenance, upgrading and development of infrastructure is provided to meet the needs of the community and businesses.~~ Critical infrastructure: 1. is efficient, effective and resilient; 2. provides and distributes essential and secure services as part of local, regional or national networks, including in emergencies; 3. coordinates with urban development and land uses throughout the district; and 4. enables people and communities to provide for their wellbeing.
Spark New Zealand Trading Limited	S154.014	INFR - Infrastructure	INFR-O2	Support in part	The proposed amendments to INFR-O1 result in INFR-O2 being superfluous and Gore District Subdivision and Land Development Bylaw 2019 does not need to be referenced in an objective, as it is not referenced in any subsequent rules or standards which is where its implementation could actually be followed.	Delete INFR-O2

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Spark New Zealand Trading Limited	S154.015	INFR - Infrastructure	INFR-O3	Support in part	INFR-O3 is clearly directed at reverse sensitivity. The objective should be rewritten to specifically state reverse sensitivity effects.	Amend INFR-O3 as follows: ~~Infrastructure or land reserved for future infrastructure is protected from adverse effects of subdivision, use and development that is incompatible or may compromise the construction, maintenance, upgrade and use of infrastructure.~~ The safe and efficient operation and security of critical infrastructure is not compromised by incompatible activities and reverse sensitivity effects.
Spark New Zealand Trading Limited	S154.016	INFR - Infrastructure	INFR-O4	Support in part	It is appropriate that the adverse effects of critical infrastructure are managed, but such management needs to be done in the context of the needs for the critical infrastructure.	Amend INF-O4 as follows: ~~Adverse effects from the construction, maintenance, upgrade and use of critical infrastructure are managed.~~ The functional and operational needs of critical infrastructure are taken into account when managing any adverse effects of its location, design and operation on the natural and physical environment
Spark New Zealand Trading Limited	S154.017	INFR - Infrastructure	INFR-P1	Support	INFR-P1 clearly enables infrastructure	Retain INFR-P1 as notified
Spark New Zealand Trading Limited	S154.018	INFR - Infrastructure	INFR-P2	Support	INFR-P2 provides direction for infrastructure to be located underground but recognizes the practicalities that some infrastructure must be located above ground for functional and operational reasons.	Retain INFR-P2 as notified
Spark New Zealand Trading Limited	S154.019	INFR - Infrastructure	INFR-P4	Support	The telecommunications industry looks for colocation opportunities wherever practicable. A policy encouraging the same is welcomed.	Retain INFR-P4 as notified
Spark New Zealand Trading Limited	S154.020	INFR - Infrastructure	INFR-P5	Oppose	INFR-P5 appears to be a repeat of INFR-P3, with the addition of the phrase shared which has the same basic meaning as co-location. Two policies are not required.	Delete INFR-P5
Spark New Zealand Trading Limited	S154.021	INFR - Infrastructure	INFR-P6	Support	INFR-P6 enhances INFR-O3, and is explicit in its reference to reverse sensitivity effects.	Retain INFR-P6 as notified
Spark New Zealand Trading Limited	S154.022	INFR - Infrastructure	INFR-P7	Support in part	As with INFR-O4, it is appropriate that the adverse effects of critical infrastructure are managed, but such management needs to be done in the context of the needs for the critical infrastructure.	Amend INFR-P7 as follows: Manage the development of infrastructure, so that adverse effects on adjoining activities, sites, ecosystem health, and Ngāi Tahu cultural values are avoided, remedied or mitigated, recognising the functional need and operational need of critical infrastructure
Spark New Zealand Trading Limited	S154.023	INFR - Infrastructure	INFR-Overview	Oppose	In order to comply with NPS, it must be a standalone chapter. Noting the proposed amendments to INFR9, the only other chapters which should be applicable to infrastructure are the subdivision and general district wide matters chapters in Part 2 of the plan. All other actual and potential effects of infrastructure are provided for within the Infrastructure chapter	Amend Note 1 as follows: The provisions in this chapter apply ~~in addition to the provisions of the other chapters in the District Plan and the plan should be read as a whole. This chapter also implements other chapters in the District Plan that do not have specific rules such as Sites and Areas of Significance to Māori and Mana Whenua.~~ on a district wide basis. As such the rules in the zone chapters do not apply. The provisions in the subdivision and General District Wide matters chapters in Part 2 of the District Plan are applicable.
Spark New Zealand Trading Limited	S154.024	INFR - Infrastructure	INFR-R1	Support	INFR-R1 is an appropriate rule for the development and management of underground infrastructure. While the rule is supported, it could be rewritten so that it is consistent with the terminology used in INFR-P2.	Retain INFR-R1 as notified with potential to rewrite to refer to 'underground infrastructure' rather than 'below ground'
Spark New Zealand Trading Limited	S154.025	INFR - Infrastructure	INFR-R2	Support	INFR-R2 provides absolute clarity that infrastructure placed within a building is permitted	Retain INFR-R2 as notified
Spark New Zealand Trading Limited	S154.026	INFR - Infrastructure	INFR-R3	Support in part	Increasing the replacement location distance to 10m allows for greater flexibility when elements such as driveways, potential contamination areas and so forth occur.	Amend INFR-R3(1)(d) as follows: maximum change in location of structure - ~~5m~~ 10m
Spark New Zealand Trading Limited	S154.027	INFR - Infrastructure	INFR-R4	Support	The replacement of existing support structures should be permitted for above ground infrastructure in urban zones. It should also be	Amend INFR-R4(1) as follows: Other than where existing or replacement support structures (including buildings) are used, lines are to be located underground. Replacement support structures must meet the permitted provisions in INFR-R3(1), and

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					made clear that existing support structure should include buildings.	compliance with all INFR Standards is achieved.
Spark New Zealand Trading Limited	S154.028	INFR - Infrastructure	INFR-R5	Support	The consistency in standard and approach (including activity status) between INFR-R5 and regulation 55 of the NESTF is supported.	Retain INFR-R5 as notified
Spark New Zealand Trading Limited	S154.029	INFR - Infrastructure	INFR-R8	Support in part	Controlled Activity status should be afforded to those activities which are of sufficient size to not have significant adverse effects on the environment, meet the infrastructure standards in the PDP, but cannot meet the NESTF permitted regulations.	Amend INFR-R8 so that Controlled Activity status is afforded to the following activities and sizes: 1. for panel antenna a width of 0.8m is not exceeded; 2. for dish antenna, the antenna does not exceed a diameter of: a. 1.2m in a residential zone; or b. 3m in all other zones. 3 Any activity which does not meet the NESTF permitted regulations but otherwise complies with the INFR standards.
Spark New Zealand Trading Limited	S154.030	INFR - Infrastructure	INFR-R9	Support in part	INFR-R9 should include all overlays so that there is no requirement for infrastructure applications to consider other chapters. Activity status should be made restricted discretionary, with matters of discretion being effect on the overlay the infrastructure is within, and the functional and operational needs of critical infrastructure. (in line with changes requested to INFR-04 and INFR-P7). Last, to provide consistency with NESTF Regulation 57, telecommunications should not have to meet this rule for natural hazards as they are accounted for in the Civil Defense Emergency Management Act 2001	Amend INFR-R9 so that the activity status in the specified areas is restricted discretionary not discretionary and add effects on the the matter listed in (a) to (d) as well as the the functional needs and operational needs of, and benefits derived from critical infrastructure, including the potential impact on the levels of service or health and safety if the work is not undertaken as matters of discretion. Further, an update is required to INFR-R9.1 to include the containmainated land, hazardous substances, natural hazards (excluding telecommunications) ecosystems and indigenous boidiversity and public access chapters.
Spark New Zealand Trading Limited	S154.031	INFR - Infrastructure	INFR-S1	Support in part	Identification of lines over waterbodies on planning maps is needed so it is apparent which waterbody the standard applies to and clarify how INFR-S1 and INFR-S5 interact.	Retain INFR-S1, but detail navigable waterbodies on the planning maps, and ensure that there is a clause in the standard which provides clarification for how INFR-S1 is to interact with INFR-S5.
Spark New Zealand Trading Limited	S154.032	INFR - Infrastructure	INFR-S2	Support	It is noted INFR-S2 does not apply to poles and antennas.	Retain INFR-S2 as notified
Spark New Zealand Trading Limited	S154.033	INFR - Infrastructure	INFR-S3	Support in part	By adding the words (excluding any lightning rod or GPS antenna) from the measurement of height provides alignment with the NESTF. The permitted heights should encourage co-location of telecommunication providers onto a single structure and to achieve this seperation between the antennas, which is best achieved via height is needed in alignment with INFR-P4. The permitted height for one provider in the industrial zones is supported but due to large trees in the rural area greater height is sought to prevent blocking signal. Under INFR-S3.2, antenna which are attached to poles and masts need to have clearance above built structures to meet radiofrequency standards, and provide line of sight connection to end users for functional and operational requirements	Amend wording: The maximum height (excluding any lightning rod or GPS antenna) of any utility pole or mast shal be. INFR-S3.1 - 25m for one telecommunications provider and 30m for two or more telecommunications providers in the General Industrial Zone and Light Industrial Zone, 35m for one telecommunications provider and 40m for two or more telecommunications providers in the Rural Zone and Rural Lifestyle Zone. INFR-S3.2 so that the permitted height in all other zones is the underlying building height in the zone, plus 5m (for one telecommunication provider) and plus a further 5m if the facility provides for the co-location of two or more telecommunication providers.
Spark New Zealand Trading Limited	S154.034	INFR - Infrastructure	INFR-S4	Support	The exceptions to INFR-S4 are supported	Retain INFR-S4 as notified
Spark New Zealand Trading Limited	S154.035	INFR - Infrastructure	INFR-S5	Support in part	INFR-S5 is supported, however it is currently unclear as to what the interaction between INFR-S1 and INFR-S5 is.	Ensure that there is a clause in the standard which provides clarification for how INFR-S5 is to interact with INFR-S1.

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Spark New Zealand Trading Limited	S154.036	INFR - Infrastructure	INFR-S6	Support	INFR-S6 provides appropriate footprints for telecommunication infrastructure.	Retain INFR-S6 as notified
Spark New Zealand Trading Limited	S154.037	INFR - Infrastructure	INFR-S7	Support in part	Some finessing of the rule is proposed to better reflect the different antenna types used in the telecommunication industry.	Amend INFR-S7 as follows: 1. That for panel antennas the maximum width is 0.7m, and for all other dish antenna types the maximum surface area diameter is no greater than 1.5m ² 0.6m in the residential zones and 1.2m in all other zones and for whip and dipole antennas, the maximum length is are less than 4m in length . 2. For small cells and ancillary equipment the volume of the unit must not exceed 2.5m ³ .
Spark New Zealand Trading Limited	S154.038	INFR - Infrastructure	INFR-Additional provisions sought	Support in part	Temporary infrastructure is used when a) an event-with insufficient infrastructure for capacity expected b) construction activity requiring existing networks turned off c) fault or disaster Limiting temporary infrastructure to 12 months means that there is a time limit for any resultant environmental effects.	New rule permitting temporary network utilities. The only standard should be that the infrastructure must be removed within 12 months. The elevation can be to discretionary activity status
Spark New Zealand Trading Limited	S154.039	NH - Natural Hazards	NH-Additional provisions sought	Support in part	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.	Add Note 3: Telecommunications infrastructure is exempt from having to comply with the provisions in this chapter
Spark New Zealand Trading Limited	S154.040	HH - Historical Heritage	HH-P7	Oppose	Rule INFR-R	Delete HH-P7
Spark New Zealand Trading Limited	S154.041	SUB - Subdivision	SUB-O3	Support	SUB-O3 clearly sets out that infrastructure is integrated with the subdivision of land	Retain SUB-O3 as notified
Spark New Zealand Trading Limited	S154.042	SUB - Subdivision	SUB-P2	Support	Requiring provisions for infrastructure in new allotments is supported	Retain SUB-P2 as notified
Spark New Zealand Trading Limited	S154.043	SUB - Subdivision	SUB-P5	Support in part	Reverse sensivity effects should be avoided, remedied or mitigated on all critical infrastructure to provide consistency.	Amend SUB-P5 as follows Ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land use are avoided, remedied or mitigated or managed, ~~including from adjacent land uses, railway lines and States Highways.~~
Spark New Zealand Trading Limited	S154.044	SUB - Subdivision	SUB-P7	Support	SUB-P7.1 essentially requires consultation with infrastructure providers so that they can explain capacity matters to the applicant.	Retain SUB-P7 as notified
Spark New Zealand Trading Limited	S154.045	SUB - Subdivision	SUB-P9	Oppose	SUB-P9 is not necessary, as this matter is regulated under the Infrastructure chapter	Delete SUB-P9
Spark New Zealand Trading Limited	S154.046	SUB - Subdivision	SUB-R5	Support in part	Restricted Discretionary activity status for subdivision which creates new allotments in all	Retain SUB-R5 as notified

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					zones except the development areas, and having telecommunication servicing a matter of discretion is supported	
Spark New Zealand Trading Limited	S154.047	SUB - Subdivision	SUB-R6	Support	Restricted Discretionary activity status for subdivision which creates new allotments in the Gore South Development Area, and having telecommunication servicing a matter of discretion is supported	Retain SUB-R6 as notified
Spark New Zealand Trading Limited	S154.048	SUB - Subdivision	SUB-R7	Support	Restricted Discretionary activity status for subdivision which creates new allotments in the Gore West Development Area, and having telecommunication servicing a matter of discretion is supported.	Retain SUB-R7 as notified
Spark New Zealand Trading Limited	S154.049	SUB - Subdivision	SUB-Additional provisions sought	Support in part	Infrastructure allotments can have different demands from a subdivision perspective than zone based subdivision in any given area. Controlled activity subdivision for infrastructure is appropriate, with control to allow for actual and potential adverse effects on the environment to be addressed.	Add a new rule for subdivision for infrastructure purposes as follows: All Zones - Activity Status: Controlled. Subdivision to create any site to be used solely for the provision of infrastructure. Matters of Control 1 The location, size and design of allotments, building platforms, accessways, right of ways, vehicle crossings, open space and connections to the surrounding area; and 2 the ability to accommodate permitted and/or intended land uses; and 3 the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and 4 measures to avoid, remedy or mitigate adverse effects: of any natural hazards or other risks; and on any sensitive environments, waterbodies, ecosystems or notable trees; and on infrastructure; and on existing or permitted adjoining or adjacent land uses;
Spark New Zealand Trading Limited	S154.050	EW - Earthworks	EW-O1	Support	EW0-O1 appropriately sets out the requisite direction for earthworks	Retain EW-O1 as notified
Spark New Zealand Trading Limited	S154.051	EW - Earthworks	EW-P1	Support	Recognizing the benefits of earthworks for network utilities is supported.	Retain EW-P1 as notified
Spark New Zealand Trading Limited	S154.052	EW - Earthworks	EW-Exemptions	Support in part	As the infrastructure chapter encourages and permits underground infrastructure, trenching is required. Trenching is generally limited in extent, does not alter the ground level, and is backfilled as work progresses along lineal infrastructure. It has limited effects and should be exempted	Add trenching no deeper than 1.0m and wider than 1.0m for underground infrastructure, provided that no more than 120m of trench is open at any one time to the list of earthworks and land disturbance activities that are exempt from the rules in this chapter
Spark New Zealand Trading Limited	S154.053	EW - Earthworks	EW-R11	Support	The volumes and requirements of this rule are appropriate.	Retain EW-R11 as notified
Spark New Zealand Trading Limited	S154.054	EW - Earthworks	EW-S4	Oppose in part	Access tracks to telecommunication sites are often on steep land. 15 degrees is considered to restrictive. Wellington has slope angle of 34 degrees	Amend EW-S4 as follows: Earthworks shall not be undertaken on land with an existing slope angle exceeding ~~15~~ 34 degrees.
Spark New Zealand Trading Limited	S154.055	National Direction Instruments	National Direction Instruments	Support	This section is important to help plan readers understand the relationship between the District Plan and NES.	Retain the National Environmental Standards subsection.
Spark New Zealand Trading Limited	S154.056	UFD - Urban form and development	UFD-O1	Support	Appropriately recognises the need for development to be integrated with existing or new infrastructure.	Retain UFD-O1 as notified.
Spark New Zealand Trading Limited	S154.057	UFD - Urban form and development	UFD-O7	Support	Appropriately recognises the need for new and existing infrastructure for well-functioning urban environments.	Retain UFD-O7 as notified.
Stephen Hook	S31.001	Zone map layers	GIZ-MAP	Oppose	Do not want lifestyle block changed from Rural to Industrial as it will ruin the area and devalue the property.	Opposing the change in land use for the South Gore area from Rural to General Industrial.

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Stephen Hook	S31.002	DEV - Development Areas	DEV - General	Oppose	Do not want lifestyle block changed from Rural to Industrial as it will ruin the area and devalue the property	Opposing the change in land use for the South Gore area from Rural to General Industrial
Stoney Creek Station Limited	S3.001	SASM - Sites and Areas of Significance to Māori	SASM - General	Oppose	Identifying the whole district as SASM may unnecessarily require consent and consultation for day-to-day farm activities, increasing time, cost and workload. As objectives and policies regarding Ngāi Tahu values have been incorporated into the plan, there is no justification for the entire district to be a SASM. The SASM chapter should instead provide further clarity to plan users by identifying and delineating those specific sites, areas and landscapes that are significant to Māori. Similar approaches have been undertaken in other recently reviewed district plans.	Sites and Areas of Significance to Māori are identified and mapped in the planning maps through a transparent, consistent process. .
Stoney Creek Station Limited	S3.002	SASM - Sites and Areas of Significance to Māori	SASM-O1	Oppose	Stoney Creek is concerned that the broad-brush approach within the PGDP creates uncertainty for plan users as to what activities require consultation with mana whenua and could increase time, cost and workload of day-to-day farm activities. The approach creates disproportionate onus on applicants and is also unclear what "appropriate considerations" (as referred to in Objective SASM-O1) may be. The SASM chapter should provide further clarity by identifying and delineating those specific sites.	Amend SASM-O1 to read: ~~All~~ Those lands, waterbodies, natural features, and marae within Gore District identified as Sites of Significance to Māori in the Planning Maps are recognised as sites and areas of cultural significance to mana whenua and/or tangata whenua, and are afforded appropriate considerations with regard to the cultural values identified in MW-2.3 in relation to their management, development, and use.
Stoney Creek Station Limited	S3.003	SASM - Sites and Areas of Significance to Māori	SASM-P1	Oppose	Stoney Creek requests that existing activities are provided for in accordance with s10 of the RMA.	Amend SASM-P1 to read: New Use, subdivision, and development is enabled where adverse effects on ~~the~~ Ngāi Tahu cultural values, including those listed in MW-2.3, are avoided, remedied or mitigated. Council shall have regard to any other benefits (e.g. pest control) provided by the proposed activity.
Stoney Creek Station Limited	S3.004	SASM - Sites and Areas of Significance to Māori	SASM-P2	Oppose	Amendments are suggested to align with the concerns raised with regard to SASM-O1	Amend SASM-P2 to read: The impact of proposed activities on Sites of Significance to Māori as identified in the Planning Maps on ~~the~~ Ngāi Tahu cultural values identified in MW-2.3, and their underlying relationship with the natural environment is determined in partnership with Hokonui Rūnanga and takes into account any benefits of the proposal.
Stoney Creek Station Limited	S3.005	ECO - Ecosystems and Indigenous Biodiversity	ECO-O1	Oppose	Stoney Creek supports the alignment NPSIB and requests that this objective reflect the wording contained within the NPSIB. The use of 'significant indigenous vegetation' and 'significant habitats of indigenous fauna' is unclear.	Amend ECO-O1 to read: Maintain Indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas). through the identification of Significant Natural Areas.
Stoney Creek Station Limited	S3.006	ECO - Ecosystems and Indigenous Biodiversity	ECO-O3	Oppose	The wording of this policy is more stringent than the NPSIB as it requires the "enhancement" of values. Amend wording to align with NPSIB.	Amend ECO-O3 to read: Provide for ~~appropriate~~ new subdivision, use and development within and adjacent to Significant Natural Areas where adverse effects on the values of the area can be avoided or managed . ~~maintained and enhanced.~~
Stoney Creek Station Limited	S3.007	ECO - Ecosystems and Indigenous Biodiversity	ECO-P2	Oppose	Existing activities within or affecting SNAs are provided for in Policy 9 and Clause 3.15 of the NPSIB. Amend wording to better align with the NPSIB objectives.	Amend ECO-P2 to read: ~~Allow~~ Enable activities within or affecting Significant Natural Areas that may impact the extent or ecological integrity of the SNA indigenous biodiversity values where:1. ~~This~~ The activity is for a lawfully established activity; or 2. Their purpose is to facilitate or express Ngāi Tahu rights, interests, or cultural purpose; or 3. The activity has a functional or operational need to be located in the area; or ...
Stoney Creek Station Limited	S3.008	ECO - Ecosystems and	ECO-P3	Amend	Stoney Creek supports the alignment of the PGDP objectives and policies with the wording of the	Amend ECO-P3 to read: Any new subdivision, use, or development shall avoid adverse effects on an SNA that result in:

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		Indigenous Biodiversity			NPSIB which allows for new subdivision, use or development where this is required to address a high risk to public health or safety.	1. loss of ecosystem representation and extent; ... Unless: 6A. The activity is required to address a high risk to public health or safety. or: The activity relates to: ~~Unless they relate to:~~ ... 6. Construction of specified infrastructure that provides significant national or regional public benefit; 7. Mineral and aggregate extraction that provides significant national public benefit that could not otherwise be achieved using resource in New Zealand;
Stoney Creek Station Limited	S3.009	ECO - Ecosystems and Indigenous Biodiversity	ECO-P8	Oppose	ECO-P8 has a different set of criteria to the NPSIB. Managing effects on indigenous biodiversity outside of SNAs by applying the effects management hierarchy would be in line with the NPSIB.	Preferred relief: Withdraw ECO-P8 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised policy balanced provisions recognising that some vegetation removal is necessary and providing for this where effects are managed using the effects management hierarchy. Alternative relief: Amend Policy ECO-P8 to read: When assessing consents for subdivision, land use and development outside of SNAs, require applicants to demonstrate that effects on indigenous biodiversity will be managed by applying the effects management hierarchy., avoid effects which will: ~~1. Prevent an indigenous species or community being able to persist in their habitats in the ecological district; 2. Result in a degradation of the threat status, further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the ecological district level; 3. Result in a reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a – nationally critical, nationally endangered and nationally vulnerable; and 4. discourage mana whenua access to indigenous biodiversity for a mana whenua cultural purpose~~
Stoney Creek Station Limited	S3.010	ECO - Ecosystems and Indigenous Biodiversity	ECO-P9	Oppose	ECO-P9 gives no weight to existing activities but should reflect that there may be lawfully established activities within or affecting SNAs that may require resource consent but do not have adverse effects on ecological values and may provide benefits such as pest control. ECP-P9 Point 8 refers to ECO-P7 for offsetting, however ECO-P7 does not refer to offsetting.	Amend ECO-P9 to read: When assessing resource consents in Significant Natural Areas, consider the following matters:... 5. The effects the activity may have on the introduction, ~~or~~ spread or control of exotic pest plant and animal ~~weed~~ -species and pest animals both terrestrial and aquatic; ... 8. The appropriateness and effectiveness of any biodiversity offsetting or compensation ~~in accordance with ECO – P7~~ to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied. 9. Whether the activity is a lawfully established existing activity that is no grater in intensity, scale or character and will not result in a loss of extent or degradation of ecological integrity of a SNA.
Stoney Creek Station Limited	S3.011	ECO - Ecosystems and Indigenous Biodiversity	ECO-P10	Amend	Stoney Creek supports the recognition of the benefits farmers provide in the management of indigenous biodiversity but wish to better recognise the extent of benefits. Clause 6 of ECO-P10 encouraging the provision of free ecological surveys, financial support and rates remissions for SNA landholders is supported.	Amend ECO-P10 to read: Maintain indigenous biodiversity across the district by:... 8. Recognising the benefits of farm management practices and active management of indigenous biodiversity, including but not limited to voluntary animal and plant pest and stock control, fencing , and/or formal legal protection. ...
Stoney Creek Station Limited	S3.012	ECO - Ecosystems and Indigenous Biodiversity	ECO-P11	Oppose	There may be situations where offsetting is appropriate but is not for cultural purposes or is consistent with other values or drivers.	Preferred relief: Withdraw ECO-P11 and redraft in consultation with key stakeholders, including Stony Creek Station. Alternative relief: Amend Policy-P11 as follows: Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity where: 1. The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity of similar species and location where practicable; or 2. The conservation outcomes are measurable and positive; and

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						3. The biodiversity offsets or compensation are in accordance with best practice, including but not limited to New Zealand Government guidance on biodiversity offsetting.; and 4. ~~Off-setting and compensation packages are consistent with Ngāi Tahu cultural purposes~~
Stoney Creek Station Limited	S3.013	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose	Stoney Creek supports Indigenous Vegetation Clearance and Land Disturbance rules but finds Rule ECO-R1 too restrictive, especially for fencing. The rule's broad definition of "Land Disturbance" raises confusion, as it encompasses all land activities without clarification. The permitted width for disturbance is impractical for installing fences, it does not allow for access and maintenance. The rule lacks provisions for upgrading existing structures, which may have better environmental outcomes and should be enabled. Maintenance of improved pasture under ECO-R1(e) is more restrictive than NPSIB. The inclusion of a permitted activity rule for the incidental removal of indigenous species during exotic species control is supported but should be clarified in the rule. There should be no limits around the removal of deliberately planted vegetation. A restricted discretionary status would be more appropriate for minor environmental effects. Non-complying activity status for indigenous vegetation removal for those activities listed in ECO-R1(1) where this falls within a SNA does not acknowledge the presence of existing activities within SNAs (as allowed for under the NPSIB). Therefore, Discretionary activity status is proposed for these activities.	Preferred Relief: Withdraw ECO-R1 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised rule an exemption for indigenous vegetation removal and land disturbance associated with farming activities within the new Hokonui Hills Special Precinct (discussed further below). Alternative relief: Amend ECO-R1 as follows: Indigenous Vegetation Clearance and Land Disturbance associated with Indigenous Vegetation Clearance Activity status: Permitted 1. It is necessary for the following purposes: (aa) The installation, maintenance, repair, replacement or upgrade of: (i) Fences (ii) Farm tracks (iii) Farm infrastructure [Refer to proposed definition] (a) The maintenance, repair, or replacement or upgrade of existing lawfully established: ~~(i) fences;~~ (ii) vehicle tracks, (iii) roads, (iv) infrastructure, (v) walkways, (vi) firebreaks, (vii) dams, (viii) waterway crossings, or (ix) network utilities, ~~and the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i), and (vi)~~ ... (e) Maintenance of improved pasture outside of a SNA, where: ~~(i) the improved pasture has not become a SNA, and (ii) the land is not an uncultivated depositional landform, and (iii) it will not adversely affect a Threatened or At Risk (declining) species. (f) In accordance with an approved Reserve Act or Conservation Act reserve management plan.~~ (g) For the maintenance, repair or replacement of existing buildings and structures, or to remove a potential fire risk, including an area no further than ~~2.0m~~ 7.5m from the exterior wall of an existing building. (h) The removal indigenous vegetation that is incidental to the removal of exotic species generally and pest plants and pest animals in accordance with any Regional Pest Management Plan or the Biosecurity Act 1993. ... k) The works relate to indigenous vegetation that was deliberately planted: ~~(i) Within a domestic garden; or~~ (ii) For the use of screening/shelter belt purposes (such as farm hedgerows). Activity status where compliance is not achieved with: ECO-R1(1) and ECO-R1(2)(a)(i) or ECO-R1(1)(a)(vi) Restricted discretionary Where: 1. The indigenous vegetation clearance and associated land disturbance takes place outside a Significant Natural Area. 2. The indigenous vegetation clearance and land disturbance does not comply with ECO-R1(1)(a)(i) or ECO-R1(1)(a)(vi). Matters of Discretion: 1. Effects on indigenous biodiversity values. 2. the matters outlined in ECO-P3, ECO-P7, ECO-P8, ~~ECO-P9~~ and ECO-P10. ... 7. The benefits to indigenous biodiversity provided by the proposed activity. ECO-R1(3): Restricted Discretionary Matters of Discretion: 1. Effects on indigenous biodiversity values. 2. the matters outlined in ECO-P3, ECO-P7, ECO-P8, ECO-P9 and ECO-P10.

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						3. The quantity and quality of indigenous vegetation impacted and the reasons for the works. 4. The benefits of the proposed activity. 5. The mitigation proposed. ECO-R1(1) and ECO-R1(2): ~~Discretionary-Non-complying~~Where: 1. The indigenous vegetation clearance and land disturbance takes place inside a Significant Natural Area.<i>NOTE - the 1.5m limit for vegetation clearance and land disturbance associated with fences ECO-R1 was withdrawn by Council resolution on 21 November 2023</i>
Stoney Creek Station Limited	S3.014	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	indigenous vegetation clearance and land disturbance for any purpose other than those listed in ECO-R1(1) is a discretionary activity and there are instances where this is too restrictive. There's no provision for removing regenerating vegetation in areas lawfully cleared before. A proposed new rule aims to grant permitted activity status for minor vegetation clearance.	Add a new Rule ECO-R1(2): 2. Indigenous Vegetation Clearance and any associated land disturbance outside a SNA for any purpose other than listed in ECO-R1(1) or ECO-R1(3), provided:(a) The vegetation to be cleared is regenerating indigenous vegetation less than 15 years old, where the land was previously lawfully cleared of indigenous vegetation; or(b) The area of indigenous vegetation clearance does not exceed 500 m2 in any 12 month period.
Stoney Creek Station Limited	S3.015	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	The maintenance of improved pasture within or adjacent to a SNA is provided for in the NPSIB, but this is not reflected in the PGDP rule framework.	Add a new Rule ECO-R1(3): Indigenous vegetation clearance and any associated land disturbance required for the maintenance of improved pasture within or affecting a SNA where: (i) the maintenance of improved pasture is part of a regular cycle of periodic maintenance, and (ii) the intensity, scale or character of the effects are not increased, and (iii) the improved pasture has not itself become a SNA, and (iv) the land is not an uncultivated depositional landform, and (v) the maintenance will not adversely affect a Threatened or At Risk (declining) species.
Stoney Creek Station Limited	S3.016	NFL - Natural Features and Landscapes	NFL - General	Oppose	As drafted, the ONL chapter is fundamentally flawed as it fails to acknowledge the established presence of pastoral farming within mapped ONL areas and would significantly restrict farming activities. There seems to be no justification for this as comments in the S32 seem to contradict the change. Considers the evaluation and assessment in the report insufficient. The rule framework is overly restrictive particularly when the policy framework acknowledges the presence and benefits provided by existing pastoral farming within the Hokonui Hills ONL which, by GDC's own assessment, has not resulted in significant adverse effects under the current framework.	Preferred Relief: Withdraw the Natural Features and Landscapes chapter in its entirety and redraft in consultation with key stakeholders, including Stony Creek Station. Stony Creek Station considers that an appropriate resolution would be to create a Hokonui Hills Special Precinct, within which rural activities associated with pastoral farming are permitted, with appropriate and practical limits set. The provisions of the other chapters of the PGDP would not apply to farming activities within the Hokonui Hills Special Precinct
Stoney Creek Station Limited	S3.017	NFL - Natural Features and Landscapes	NFL-P1	Oppose	Inclusion of policies that recognise pastoral farming within ONLs but considers NFL-P1 does not go far enough to recognise the benefits of pastoral farming.	Amend NFL-P1 to read: Avoid adverse effects on the values and characteristics of identified outstanding natural features and landscapes described within Appendix 5 by: ... 2. Recognising the benefits provided by existing ~~existence of~~ working pastoral farms and their contribution to the openness and landform legibility of outstanding natural features and landscapes;
Stoney Creek Station Limited	S3.018	NFL - Natural Features and Landscapes	NFL-P4	Oppose	When assessing resource consents within the ONL, it is important to recognise the presence of existing activities within these areas.	Amend NFL-P4 to read: When assessing resource consents within Outstanding Natural Features and Landscapes, consider the following matters;... 4. The presence of existing activities within the ONL and whether the activity is changing in intensity, scale or character.

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Stoney Creek Station Limited	S3.019	NFL - Natural Features and Landscapes	NFL - General	Amend	The Rule table within the NFL chapter states that the rules are applicable in "All zones". This is misleading as the rules only apply within an identified ONL or ONF.	Amend "All zones" under rules NFL-R1 to NFL-R8 to read "All areas identified as ONL/ONF in the Planning Maps".
Stoney Creek Station Limited	S3.020	NFL - Natural Features and Landscapes	NFL-R1	Oppose	The increased number of activities controlled in the Hokonui Hills ONL contradicts the comments made in the S32 report and there is seemingly no justification for the increase. The findings of the report are disputed, including the cost benefit analysis. Considers the rule framework overly restrictive and that it contradicts the policy framework which acknowledges the presence and benefits of pastoral farming, especially as the existing provision has not resulted in significant adverse effects.	Amend NFL-R1 to read: Activity status: Permitted Where: 1. The building or structure is for farming purposes, ~~excluding residential use~~ ; (a) Does not exceed ~~500 30~~ m ² in area; and (b) Height shall not exceed ~~8 3~~ m; 2. Buildings or structures for non-farming purposes; (a) The maximum height does not exceed 2m; and (b) The maximum gross floor area is no more than 5m ² 3. All buildings and structures (excluding fences and buildings and structures for farming purposes) must be finished in materials with a maximum reflectance value of 30%
Stoney Creek Station Limited	S3.021	NFL - Natural Features and Landscapes	NFL-R2	Amend	Supportive of permitted status for tree planting but it is not appropriate to limit this for certain purposes as this may discourage further planting e.g. where non-indigenous species may be required for wind breaks, shelter belts etc.	Amend NFL-R2 to read: Tree planting, other than plantation forestry within an identified ONF/L Activity status: Permitted Where: 1. The tree planting is of indigenous species or isrequired and for restoration, conservation, or hazard prevention measures, shelter belts, wind breaks, or to address land instability or erosion. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: 1. Effects on the values as listed in NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3.3. Any benefits provided by the proposed tree planting.
Stoney Creek Station Limited	S3.022	NFL - Natural Features and Landscapes	NFL-R3	Oppose	S32 report states the operative plan controls were effective at managing activities within ONLs. As such, additional controls in the PGDP are not supported and should align more with the controls that exist currently.	Amend Rule NFL-R3 to read: Land disturbance and earthworks within an identified ONF/L Activity status: Permitted Where: X. Required for cultivation, fencing or pest plant management; or X. Associated with the construction of any road or track no greater than 7 metres in width or requiring more than 2 metres of cut or fill for a total distance greater than 100 metres; or X. The earthworks do not exceed 100 linear metres in any direction; and 1. The depth of the earthworks shall not exceed ~~1m~~ 2m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~1m~~ 3m above the original surface of the ground; and 3. the area of the earthworks shall not exceed 100m ² in any 12 month period; ~~and 4. the width of land disturbance for fencing shall not exceed 1m; and 5. the ground for fencing related land disturbance is reinstated to original levels within 48 hours of work being completed.~~
Stoney Creek Station Limited	S3.023	NFL - Natural Features and Landscapes	NFL-R4	Oppose	Supportive of permitted activity status that allows earthworks to maintain existing facilities within an ONL, however considers the scope of NFL-R4 to be too narrow.	Amend Rule NFL-R4 to read: Maintenance repair, replacement or upgrade of buildings and structures (excluding fences) , critical infrastructure, existing roads, farm tracks, walking and cycling trails, waterway crossings, or improved pasture within an identified ONF/L Activity status: Permitted Where: 1. The scale of the activity ~~critical infrastructure, road, farm or trail~~ isnot increased. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion:

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						1. Effects on the values as listed within NFL-APP Appendix 5 resulting from an increase in the scale of the activity. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3. 3. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape.
Stoney Creek Station Limited	S3.024	NFL - Natural Features and Landscapes	NFL-R5	Oppose	Supportive of the inclusion of a permitted activity status for fences within the ONL, but questions why only post and wire fences are permitted. Fences are not visually dominant structures and are required for good animal husbandry, health and safety and stock management and are overly restricted within ONLs.	Amend Rule NFL-R5 to read: Fences within an identified ONF/L Activity status: Permitted Where: 1. The fence is required for the exclusion or control of stock or to delineate property boundaries. a post and wire fence; Note: fences are a structure and therefore subject to the river setback rules Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5.2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3.
Stoney Creek Station Limited	S3.025	NFL - Natural Features and Landscapes	NFL-R6	Oppose	NFL-R6 duplicates ECO-R1(1) and creates confusion as to which standard applies.	Delete Rule NFL-R6 in its entirety.
Stoney Creek Station Limited	S3.026	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Amend	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any new farm track is too restrictive to farming operations.	Add a new rule NFL-R6A: New farm tracks within an identified ONF/L. Activity status: Permitted. Where: 1. Any new farm track is no greater than 7 metres in width. 2. Unretained cut and fill batters shall not:(a) be steeper than 2 horizontal to 1 vertical; (b) be constructed using moisture content susceptible soils; (c) have a bench with a width of more than 1.8m. 3. Excess material from the construction of the farm track is reinstated to match the natural contour of the surrounding land. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5. 2. The necessity of what is proposed and any alternatives. 3. Mitigation measures proposed. 4. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape 5. The benefits of the proposed activity.
Stoney Creek Station Limited	S3.027	NFL - Natural Features and Landscapes	NFL-R6	Oppose	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any new farm track is too restrictive to farming operations.	Amend Rule NFL-R6 to read: New Roads, farm tracks greater than 7 metres in width , walking and cycling tracks within an identified ONF/L Activity status: Restricted Discretionary Matters of Discretion: 1. Effects on the values as listed within NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW-2.3. ~~3. The necessity of what is proposed and any alternatives.~~ 4. Mitigation measures proposed. 5. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape 6. The benefits of the proposed activity
Stoney Creek Station Limited	S3.028	NFL - Natural Features and Landscapes	NFL-R7	Oppose	NFL-R7 does not distinguish between extraction of material for use outside of the property from where it was taken and farm quarries as defined in the PGDP.	Amend NFL-R7 as follows:NFL-R7 Mining and Quarrying (excluding farm quarries) within an identified ONF/L Non-Complying
Stoney Creek Station Limited	S3.029	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Amend	NFL-R7 does not distinguish between extraction of material for use outside of the property from where it was taken and farm quarries as defined in the PGDP.	Insert a new rule NFL-R7A: NFL-R7A Farm quarries that comply with GRUZ-R3. Activity status: Permitted

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Stoney Creek Station Limited	S3.030	SUB - Subdivision	SUB-R1	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R1.
Stoney Creek Station Limited	S3.031	SUB - Subdivision	SUB-R4	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R4.
Stoney Creek Station Limited	S3.032	SUB - Subdivision	SUB-R11	Oppose	An amendment to exclude activities captured by SUB-R1 and SUB-R4 is sought.	Amend SUB-R11 as follows: Subdivision in any area of an Outstanding Natural Landscape, Outstanding Natural Feature or Significant Natural Area excluding activities captured by SUB-R1 and SUB-R4.
Stoney Creek Station Limited	S3.033	SUB - Subdivision	SUB-S1	Oppose	An 8ha minimum lot size does not allow for an efficient use of land and is too small to farm economically but would be a significant loss of productive land if farmers subdivide discrete areas of larger parcels.	Amend SUB-S1 as follows: 1. No lots to be created by subdivision, including balance lots, shall have a net site area less than the minimum specified: ... (h) General Rural - ~~8ha~~ 2 ha.
Stoney Creek Station Limited	S3.034	EW - Earthworks	EW - General	Oppose	Stoney Creek supports the recognition of the need for earthworks associated with rural production activities, however considers that the rules contained within the Earthworks Chapter do not reflect the specific constraints and complexities of the Hokonui Hills environment.	Preferred relief: Insert an exemption in the preamble of the chapter for any earthworks and land disturbance activities within the Hokonui Hills Special Precinct. Develop appropriate earthwork provisions for the Hokonui Hills Special Precinct, in consultation with key stakeholders, that reflect the site specific conditions and challenges of this area.
Stoney Creek Station Limited	S3.035	EW - Earthworks	EW-O1	Oppose	Minor changes to this Objective are proposed to reflect the purpose of the RMA.	Amend EW-O1 as follows: Earthworks and land disturbance for subdivision, land use and development are facilitated and undertaken in a manner that avoids, remedies or minimises adverse effects on the ~~surrounding~~ environment and protects the natural environment, Ngāi Tahu cultural values, people and property.
Stoney Creek Station Limited	S3.036	EW - Earthworks	EW-P1	Support	Supportive of the recognition of the need for earthworks associated with rural production activities.	Retain EW-P1(2) as drafted.
Stoney Creek Station Limited	S3.037	EW - Earthworks	EW - General	Oppose	It is unclear how Rules and Standards interact and there is no guidance clarifying the applicability of standards. The activity status should be set by the rule and not the standard, otherwise it is implied activities require consent under both the rule and the standard.	Amend table headings from 'Standards' to 'Standards for Permitted Activities'. Insert a guidance note clarifying whether Standards are applicable to all activities or only those listed within the relevant Rule. Clarify the relationship between rules and standards and whether standards are to be treated as standalone rules.
Stoney Creek Station Limited	S3.038	EW - Earthworks	EW-Exemptions	Amend	Stoney Creek supports the listed exemptions from the Earthworks chapter, but questions the status of a note as opposed to a policy or rule.	Convert the exclusions note to a permitted activity rule in the Earthworks chapter.
Stoney Creek Station Limited	S3.039	EW - Earthworks	EW-R1	Oppose	The permitted provisions of EW-R1 are inconsistent and more restrictive than those proposed in the NFL chapter. The width of land disturbance permitted by the rule is not achievable for the installation of fences and is unworkable for a farming operation. General earthworks are permitted up to 1000m3, there is no commentary in the S32 report why fences are further restricted.	Amend Rule EW-R1 to read: Land disturbance for the construction of fences(All zones except ONLs) Activity status: PermittedWhere: ~~1. Any land disturbance does not exceed: (a) 1 metre in width for more than 10 metres in any 100 metre length; and/or (b) 1 metre in height or depth; and 2. The ground is reinstated to original levels within 48 hours of work being completed.~~ 3. The works are undertaken in accordance with Earthworks Standards EW-S3, EW-S5 and EW-S7. No other Earthworks Standards apply.
Stoney Creek Station Limited	S3.040	EW - Earthworks	EW-R7	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair	Amend Rule EW-R7 as follows: General Rural ZoneExcluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~

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					and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	EW-R7 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4,EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whetherthere is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility....9. The matters of discretion of any infringed Standard(s).10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Stoney Creek Station Limited	S3.041	EW - Earthworks	EW-R8	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary tofurther restrict earthwork activities in the ONL.	Amend Rule EW-R8 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R8 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility....9. ~~The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Stoney Creek Station Limited	S3.042	EW - Earthworks	EW-R9	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R9 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R9 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion:

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						1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Stoney Creek Station Limited	S3.043	EW - Earthworks	EW-R14	Oppose	Stoney Creek supports a permitted activity standard for earthworks not otherwise provided for. It is considered existing protection of ONLs is achieved through other chapters and further restrictions are unnecessary in the Earthworks chapter.	Amend EW-R14 as follows: Earthworks and land disturbance not otherwise provided for General Rural Zone, Industrial Zone, Airport Zone Excluding Historic Heritage sites, Significant Natural Areas, Outstanding Natural Landscapes or Features.: Permitted 1. In any 12 month period, the total volume of earthworks does not exceed 1,000m3 per site. 2. All Earthworks Effects Standards are complied with. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: ...11. Whether there is a functional or operational need for the location of the activity
Stoney Creek Station Limited	S3.044	EW - Earthworks	EW-S3	Oppose	Earthworks for fencing activities for stock exclusion should be exempt from these requirements.	Amend EW-S3 as follows: Setbacks from rivers and streams 1. Earthworks (excluding where required for fencing for stock exclusion) shall be set back the minimum distances from the top of the closest bank of a river or stream as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and (c) 5m for low order rivers or streams (order 1 and 2).Refer to Appendix 3 for river and stream orders
Stoney Creek Station Limited	S3.045	EW - Earthworks	EW-S4	Oppose	It is onerous to consider that any earthworks on land over 15 degrees require a site specific geotechnical assessment, where these could be very minor activities with no adverse effects.	Amend EW-S4 as follows: Instability of Land 1. Earthworks shall not result in any instability of land or structures beyond the boundary of the site where the earthworks occur. ~~be undertaken on land with an existing slope angle exceeding 15 degrees.~~
Stoney Creek Station Limited	S3.046	GRUZ - General Rural Zone	GRUZ-Additional provisions sought	Amend	Stoney Creek seeks specific zoning for activities within the Hokonui Hills area to recognise the presence of farming activities and protections for the values of the area with specific objectives policies and rules. Activities within the Hokonui Hills Special Precinct should be exempt from the GRUZ rules.	Insert Hokonui Hills Special Precinct. Develop appropriate provisions for the Hokonui Hills Special Precinct, in consultation with key stakeholders, that reflect the site-specific conditions and challenges of this area.
Stoney Creek Station Limited	S3.047	GRUZ - General Rural Zone	GRUZ - General	Oppose	Supportive of objectives, policies and rules specific to rural activities but should not duplicate the more site specific provisions that within the proposed Hokonui Hills Special Precinct.	Insert an exemption in the preamble of the chapter for any activities within the Hokonui Hills Special Precinct.
Stoney Creek Station Limited	S3.048	GRUZ - General Rural Zone	GRUZ-O1	Support	Stoney Creek supports the inclusion of an objective recognizing the importance of primary production to the District.	Retain GRUZ-O1 as drafted.
Stoney Creek Station Limited	S3.049	GRUZ - General Rural Zone	GRUZ-O2	Amend	Supportive of the description of the character and qualities of the rural zone but consider that a 'very	Amend GRUZ-O2 as follows: The character and qualities of the General Rural zone comprise: ...

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					low degree' of built form does not reflect the nature of the zone.	2. a ~~very~~ low degree of built form, well setback from other properties and roads; and ...
Stoney Creek Station Limited	S3.050	GRUZ - General Rural Zone	GRUZ-O3	Support	Supportive of recognizing the importance of supporting activities for primary production.	Retain GRUZ-O3 as drafted.
Stoney Creek Station Limited	S3.051	GRUZ - General Rural Zone	GRUZ-O4	Support	Supportive of GRUZ-O4.	Retain GRUZ-O4 as drafted.
Stoney Creek Station Limited	S3.052	GRUZ - General Rural Zone	GRUZ-O5	Amend	supportive of GRUZ-O5, but considers that it is expanded to cover all rural land and not just highly productive land.	Amend GRUZ-O5 as follows: The value and long-term benefits of using ~~highly productive rural~~ land for primary production is recognised and the availability of highly productive land for primary production for future generations is protected.
Stoney Creek Station Limited	S3.053	GRUZ - General Rural Zone	GRUZ-P1	Support	Supportive of GRUZ-P1.	Retain GRUZ-P1 as drafted.
Stoney Creek Station Limited	S3.054	GRUZ - General Rural Zone	GRUZ-P2	Support	Supportive of enabling rural industry in the rural zone.	Retain GRUZ-P2 as drafted.
Stoney Creek Station Limited	S3.055	GRUZ - General Rural Zone	GRUZ-P3	Support	Supportive of GRUZ-P3.	Retain GRUZ-P3 as drafted.
Stoney Creek Station Limited	S3.056	GRUZ - General Rural Zone	GRUZ-P4	Support	Supportive of recognising the benefits of conservation, pest management, riparian planting and fencing in the Rural Environment.	Retain GRUZ-P4 as drafted.
Stoney Creek Station Limited	S3.057	GRUZ - General Rural Zone	GRUZ-P5	Support	Supportive of GRUZ-P5.	Retain GRUZ-P5 as drafted.
Stoney Creek Station Limited	S3.058	GRUZ - General Rural Zone	GRUZ-P6	Support	Supportive of GRUZ-P6.	Retain GRUZ-P6 as drafted.
Stoney Creek Station Limited	S3.059	GRUZ - General Rural Zone	GRUZ-P7	Amend	Supportive of enabling agriculture aviation activities.	Amend GRUZ-P7 as follows: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities, whilst avoiding, remedying or mitigating any adverse ~~managing the noise effects through controlling the location of airstrips and scale of their use.~~
Stoney Creek Station Limited	S3.060	GRUZ - General Rural Zone	GRUZ-P8	Support	Supportive of recognising that residential activity is required in the rural zone to support primary production.	Retain GRUZ-P8 as drafted.
Stoney Creek Station Limited	S3.061	GRUZ - General Rural Zone	GRUZ-P10	Amend	Supportive of the implement the NPSHPL, however GRUZ-P10 as worded is not consistent with the objective and policies of the NPSHPL.	Amend GRUZ-P10 to align with the wording of the NPSHPL.
Stoney Creek Station Limited	S3.062	GRUZ - General Rural Zone	GRUZ-P11	Support	Supportive of GRUZ-P11.	Retain GRUZ-P11.
Stoney Creek Station Limited	S3.063	GRUZ - General Rural Zone	GRUZ - General	Oppose	It is unclear how Rules and Standards interact and there is no guidance clarifying the applicability of standards. Having an activity status in the standard implies that the standard is a standalone rule. It is also unclear if the standards apply to activities requiring resource consent or only permitted activities.	Amend table headings from "Standards" to "Standards for Permitted Activities". Insert a guidance note clarifying whether Standards are applicable to all activities or only those listed within the relevant Rule. Clarify the relationship between rules and standards and whether standards are to be treated as standalone rules.
Stoney Creek Station Limited	S3.064	GRUZ - General Rural Zone	GRUZ-R1	Amend	Supportive of a permitted activity rule for primary production activities but questions the need to apply the new standards to 'activities' and existing buildings/structures.	Amend GRUZ-R1 as follows: Primary Production (including Intensive Indoor Primary Production) Activity Status: Permitted Where: 1. Any new ~~or extended~~ building, or structure (excluding fences and farm infrastructure) ~~and activity~~ complies with General Rural Zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8. No other GRUZ standards apply. Except that: (a) This rule does not apply to Quarrying and Mining, as those activities are subjects to

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						Rules GRUZ-R2 and GRUZ-R3. (b) This rule does not apply to Plantation Forestry in an ONL, ONF or SNA, which is subject to District Plan rules NFL-R8 and ECO-R1
Stoney Creek Station Limited	S3.065	GRUZ - General Rural Zone	GRUZ-R3	Oppose	Farm quarries are considered to be a supporting activity under the NPS HPL and therefore should not be restricted on Highly Productive Land.	Amend GRUZ-R3 as follows: Quarrying Activities Activity status: PermittedAll areas excluding ONLs. ... 3. The activity is not located on Highly Productive Land, unless it is a farm quarry; and 4. The area is progressively stabilised, filled or recontoured; and 5. Any new building or structure relating to the quarrying activity ~~and activity~~ complies with General Rural Zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8, and Earthworksstandards EW-S3, EW-S5 and EW-S7. No other Standards apply. Activity status where compliance is not achieved:Restricted DiscretionaryMatters of discretion: 1. Location and scale of the activity ... 12. The need for the activity to support primary production.
Stoney Creek Station Limited	S3.066	GRUZ - General Rural Zone	GRUZ-R5	Support	Supportive of permitted activity status for the establishment of woodlots.	Retain GRUZ-R5 as drafted.
Stoney Creek Station Limited	S3.067	GRUZ - General Rural Zone	GRUZ-R6	Support	Supportive of a permitted activity status for conservation activities.	Retain GRUZ-R6 as drafted.
Stoney Creek Station Limited	S3.068	GRUZ - General Rural Zone	GRUZ-R7	Amend	Supportive of permitted status for residential activities with minor amendments.	Amend GRUZ-R7 to read: Residential ActivityAll areas Activity status: Permitted Where: 1. For new residential units and new minor residential units, standard GRUZ-S1 Density is met; and 2. Any new building, ~~addition~~ , or ~~external~~ -alteration that increases the number of habitable rooms and activitycomplies with zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6 and GRUZ-S7; and 3. For minor residential units, the maximum floor area shall be 80m2; and 4. The residential unit is connected to telecommunications services (whether hardwired or wireless). Activity status where compliance is not achieved with: GRUZ-R7(1): as per GRUZ-S1 activity status and matters of discretion. ~~GRUZ-R7(3):~~ (2): Restricted Discretionary Matters of Discretion: 1. The matters of discretion of any infringed standard. ~~GRUZ-R7(3):~~ Non-Complying Discretionary GRUZ-R7(4): Restricted Discretionary Matters of Discretion: 1. Whether any form of telecommunication is available at the location the proposed residential unit 2. The functional need to having a residential unit in a location without access to telecommunication and whether there are suitable alternative locations for a residential unit on site.
Stoney Creek Station Limited	S3.069	GRUZ - General Rural Zone	GRUZ-R9	Support	Supportive of a permitted activity rule for rural commercial activities.	Retain GRUZ-R9 as drafted.

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Stoney Creek Station Limited	S3.070	GRUZ - General Rural Zone	GRUZ-R11	Support	Supportive of a permitted activity status for homestay activities.	Retain GRUZ-R11 as drafted.
Stoney Creek Station Limited	S3.071	GRUZ - General Rural Zone	GRUZ-R13	Support	Supportive of a permitted activity status for rural commercial recreation activities.	Retain GRUZ-R13 as drafted.
Stoney Creek Station Limited	S3.072	GRUZ - General Rural Zone	GRUZ-R16	Support	Supportive of a permitted activity status for agricultural aviation activities.	Retain GRUZ-R16 as drafted.
Stoney Creek Station Limited	S3.073	GRUZ - General Rural Zone	GRUZ-R17	Amend	The rule table does not provide an activity status for Visitor Accommodation. It appears as though it is incorrectly referenced as GRUZ-R18, which is a discretionary activity.	Provide a correct activity status reference for GRUZ-R17.
Stoney Creek Station Limited	S3.074	GRUZ - General Rural Zone	GRUZ-R20	Oppose	Non-complying status for activities that are not otherwise provided for is extremely stringent.	Amend GRUZ-R20 to read: All other activities Activity Status: ~~Non-complying~~ Permitted 1. Any activities, including associated buildings, not otherwise provided for in the list of rules that comply with all General Rural Zone standards. Activity Status where compliance is not achieved: ~~N/A~~ Discretionary
Stoney Creek Station Limited	S3.075	GRUZ - General Rural Zone	GRUZ-S1	Oppose	The standard as worded is unclear as to whether a minor residential unit is allowed in addition to a residential unit.	Amend GRUZ-S1 as follows: Density 1. There shall be no more than one residential unit (not including minor residential units) per 40 hectares; and 2. For sites under 40 hectare, no more than one residential unit (not including minor residential units) per site; and 3. There shall be a maximum density of one minor residential unit per site
Stoney Creek Station Limited	S3.076	GRUZ - General Rural Zone	GRUZ-S3	Oppose	The matters of discretion do not recognise that supporting activities (as defined by the NPSHPL) may need to be located on Highly Productive Land.	Amend GRUZ-S3 to read: ... Restricted Discretionary Matters of discretion: 1. The adverse effects on the rural character. 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and sense of openness. 3. The adverse effects on Ngāi Tahu cultural values including those listed in MW-2.3. 4. Whether the building is located on high class soils and whether it is for a supporting activity. 5. The reason for the additional building size. 6. Noise and odour from housing animals
Stoney Creek Station Limited	S3.077	GRUZ - General Rural Zone	GRUZ-S4	Oppose	Reduced setback distances are sought for primary production buildings over 500 m2. The matters of discretion also do not anticipate two or more adjoining sites (legal parcels) that make up a single farm.	Amend GRUZ-S4 as follows: Setback to Side and Rear Boundaries All Areas Any building is setback from any side or rear boundary the minimum distances as follows: 1. Residential buildings are setback 30m; 2. Dairy sheds and buildings that house animals are setback 50m; 3. Buildings greater than 500 square metres are setback ~~200m~~ 50m , except for in the Rural Industry Precinct (PREC13) where the setback is 100m; 4. Buildings less than 10 square metres are setback 2m; and/or 5. All other buildings are setback 15m. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The adverse effects on rural character 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and sense of openness 3. The extent to which buildings are set back on the adjoining sites and the use of the

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						intervening space 4. The reasons for the reduced setback 5. Noise and odour from housing animals 6. Reverse Sensitivity effects 7. The ownership of the adjoining site and whether it forms part of the same farming operation.
Stoney Creek Station Limited	S3.078	GRUZ - General Rural Zone	GRUZ-S5	Amend	Generally supportive of setbacks to road boundaries, but seeks a reduced setback from Interregional Connector roads.	Amend GRUZ-S5 as follows: Setback to Road Boundaries All Areas Any building or structure is setback from any road boundary the minimum distances as follows: 1. Residential buildings are setback: (a) ~~100m~~ 50m from the boundary of an Interregional Connector road (state highway); (b) 40m from the boundary of a Rural Connector road; ... 5. All other buildings and structures, except fences and farm infrastructure [Refer proposed definition], are setback 15m. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: ...8. The functional or operational need for the building to be located within the road setback
Stoney Creek Station Limited	S3.079	GRUZ - General Rural Zone	GRUZ-S7	Oppose	An exclusion is sought for fences where required to exclude stock from waterbodies or to protect areas of riparian planting.	Amend GRUZ-S7 as follows: Setbacks from stream and river All activities Any building or structure (excluding fences for stock exclusion) is set back from the top of the closest bank of any stream or river the minimum distance as follows: (a) 20m for high order rivers or streams (order 5 and above) ... Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: ...8. Whether the activity will result in environmental benefits through the exclusion of stock.
Stoney Creek Station Limited	S3.080	GRUZ - General Rural Zone	GRUZ-S9	Oppose	The requirement for helicopter flight paths to be separated horizontally by at least 250m from any noise sensitive activity is unworkable as this does not account for any vertical separation.	Amend GRUZ-S9 as follows: Rural Airstrips and Helicopter Landing Areas 1. Any rural airstrip or helicopter landing area is separated by at least 500m from any notional boundary to a noise sensitive activity on a site not being serviced by the use of the rural airstrip or helicopter landing area.; and 2. ~~The flight path to the helicopter landing area is not within a horizontal distance of 250m of any notional boundary to a noise sensitive activity.~~
Stoney Creek Station Limited	S3.081	Interpretation	agricultural aviation activity	Support	Supportive of this definition.	Retain 'agricultural aviation activity' defintion as drafted.
Stoney Creek Station Limited	S3.082	Interpretation	agricultural, horticultural and pastoral activities	Amend	Farm quarries should be included within the definition of agricultural, horticultural and pastoral activities.	Amend the definition for agricultural, horticultural and pastoral activities to read:Means the use of land and / or buildings which are used for producing livestock, crops and other agricultural produce that is reliant on the soil resource of the land and includes storage of equipment and machinery associated with the activity but excludes any processing, quarrying (except farm quarries) or direct sales.
Stoney Creek Station Limited	S3.083	Interpretation	conservation activity	Support	Supportive of this definition.	Retain 'conservation activities' defiinition as drafted.
Stoney Creek Station Limited	S3.084	Interpretation	cultivation	Support	Supports the alignment of definitions with the National Planning Standards.	Retain 'cultivation' defintion as drafted.

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Stoney Creek Station Limited	S3.085	Interpretation	dead holes	Support	Supports this definition.	Retain 'dead holes' definition as drafted.
Stoney Creek Station Limited	S3.086	Interpretation	earthworks	Support	Supports this definition.	Retain 'earthworks' definition as drafted.
Stoney Creek Station Limited	S3.087	Interpretation	farm quarry	Support	Supportive of this definition.	Retain 'farm quarry' definition as notified.
Stoney Creek Station Limited	S3.088	Interpretation	farm track	Amend	Supportive of the definition but wishes to de-couple the definition from 'vehicle access' as farm tracks do not provide vehicle access to legal roads.	Amend the definition for farm track to read: Means ~~vehicle access~~ tracks for the movement of vehicles and/or stock associated with agriculture, pastoral and horticultural activities.
Stoney Creek Station Limited	S3.089	Interpretation	fences	Oppose	It is unclear why post and wire fences have been excluded from this definition as they are specifically referenced within the Rules.	Amend the definition for fences to read: Means any structure, intended to be a permanent division, screen or barrier, but shall not include a ~~post and wire fence~~ or a temporary fence such as an electric fence or construction hoarding.
Stoney Creek Station Limited	S3.090	Interpretation	helicopter Landing Area	Amend	Should be clear that areas used temporarily for helicopter landing areas are also included.	Amend the definition for helicopter landing areas to read: Any area of land, building or structure outside of the Airport Zone intended or designed to be used (including temporarily) , whether wholly or partly, for helicopter movement or servicing, including heliports and helipads
Stoney Creek Station Limited	S3.091	Interpretation	highly productive land	Amend	Supportive of the alignment of wording used in higher order documents but the definition references clauses of the NPSHPL that may cause confusion for plan users.	Amend the definition for Highly Productive Land to read: Has the same meaning as the National Policy Statement for Highly Productive Land Means land that has been mapped in accordance with clause 3.4 of the National Policy Statement for Highly Productive Land and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) of the National Policy Statement for Highly Productive Land for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)
Stoney Creek Station Limited	S3.092	Interpretation	improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'improved pasture' definition as drafted.
Stoney Creek Station Limited	S3.093	Interpretation	indigenous vegetation	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'indigenous vegetation' definition as drafted.
Stoney Creek Station Limited	S3.094	Interpretation	indigenous vegetation clearance	Oppose	This definition does not align with the definition for 'vegetation clearance' but should be defined in the same manner regardless of indigenous or exotic species.	Either: Amend the definition for indigenous vegetation clearance as follows: Means the ~~clearing or~~ removal of indigenous vegetation by vegetation clearance ~~any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, overplanting, burning or any other mechanical means as well as mob stocking.~~ Or: Delete the definition of Indigenous Vegetation Clearance entirely
Stoney Creek Station Limited	S3.095	Interpretation	land disturbance	Support	Supportive of the definitions with National Planning Standards.	Retain 'land disturbance' definition as drafted.
Stoney Creek Station Limited	S3.096	Interpretation	LUC 1, 2 or 3	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'LUC 1, 2 or 3' as drafted.
Stoney Creek Station Limited	S3.097	Interpretation	mahinga kai	Amend	Details provided in the definition for Mahinga Kai would be more appropriate in the Mana Whenua chapter.	Amend the definition of mahinga kai to: Means the same as outlined in MW - 2.3.3.3 and is an all-inclusive term that refers to the ability to access resources for harvesting, the site where gathering of these resources occurs, the act of gathering and using the resource, and the good health of the resource. ~~As a result of this practical focus, mahinga kai is considered by Hokonui Rūnanga to be, in today's language, the principal 'environmental indicator' in natural systems. If mahinga kai is not present, or is unsafe to harvest, then that natural system is under stress and requires remedial action. Mahinga kai was and is central to the Ngāi Tahu and Hokonui way of life. The collection and processing of mahinga kai is an important social, cultural,~~

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						~~environmental, and economic activity contributing to the overall well-being of Ngāi Tahu whānui. Mahinga kai practices rely on thriving and abundant biodiversity, safe and aesthetically pleasing places to practice, and the active transfer of knowledge between people. These attributes are dependent on the sustainable management of many other natural resources in the takiwā, especially waterbodies and the management of stormwater. Hokonui Rūnanga expect to be able to practice mahinga kai in our takiwā at multiple locations that are deliberately selected for the quality of the resource and its ability to sustain itself.~~
Stoney Creek Station Limited	S3.098	Interpretation	maintenance of improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'maintenance of improved pasture' definition as drafted.
Stoney Creek Station Limited	S3.099	Interpretation	primary production	Support	Supportive of the alignment with national planning standards.	Retain 'primary production' definition as drafted.
Stoney Creek Station Limited	S3.100	Interpretation	rural airstrip	Support	Supportive of this definition.	Retain 'rural airstrip' definition as notified.
Stoney Creek Station Limited	S3.101	Interpretation	rural commercial recreation activity	Support	Supportive of this definition.	Retain 'rural commercial recreation activity' definition as drafted.
Stoney Creek Station Limited	S3.102	Interpretation	rural environment	Support	Supportive of this definition.	Retain 'rural environment' definition as drafted.
Stoney Creek Station Limited	S3.103	Interpretation	rural industry	Support	Supportive of the alignment with national planning standards.	Retain 'rural industry' definition as drafted.
Stoney Creek Station Limited	S3.104	Interpretation	rural produce retail activity	Support	Supportive of this definition.	Retain 'rural produce retail activity' as drafted.
Stoney Creek Station Limited	S3.105	Interpretation	significant natural area (SNA)	Oppose	This definition does not accurately reflect the definition in the NPSIB and would include areas without following the correct process.	Amend the definition for significant natural area to reflect the NPSIB wording, as follows: Has the same meaning as per the National Policy Statement for Indigenous Biodiversity and means: ~~(a) Areas identified as SNA 1 (Waterfall Range) and SNA 2 Pukerau Red Tussock Reserve) on the planning maps until a suitably qualified ecologist engaged by Gore District Council determines that it is not an SNA~~ (b) any area that is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 4 SNA also includes areas meeting the criteria outlined in Appendix 4 including those identified at resource consent stage or as part of a Farm Environment Plan assessment or as part of a Biodiversity Covenant. (a) any area that, after 4 August 2023, is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1 of the NPSIB; and (b) any area that, on 4 August 2023, is already identified in a policy statement or plan as an area of significant indigenous vegetation or significant habitat of indigenous fauna (regardless of how it is described); in which case it remains as an SNA unless or until a suitably qualified ecologist engaged by the relevant local authority determines that it is not an area of significant indigenous vegetation or significant habitat of indigenous fauna.
Stoney Creek Station Limited	S3.106	Interpretation	vegetation clearance	Oppose	Querying why grazing has been so limited in this definition as when managed should not constitute vegetation clearance. This definition is more restrictive than higher documents. Mob-stocking and over planting are technical terms and it is unclear exactly what these refer to as they are not in the PGDP definitions.	Amend the definition of vegetation clearance to read:- (a) the disturbance, damage, destruction, or removal of vegetation by any means (for example, by cutting, crushing, application of chemicals, or burning); and (b) includes activities that result in the disturbance, damage, destruction, or removal of vegetation (for example, ~~over planting~~ , applying the seed of exotic pasture species, ~~mob-stocking~~ , or draining away water); but (c) does not include-- ... v) ~~the grazing of improved pasture within the relevant setback from a natural wetland~~

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Stoney Creek Station Limited	S3.107	Interpretation	Definitions	Amend	Stoney Creek supports the inclusion of a definition for farm infrastructure to align with the amendments sought to ECO-R1, GRUZ-R1 and GRUZ-S5.	Insert a new definition for farm infrastructure: Means those structures (excluding buildings) reasonably necessary to enable primary production activities relating to irrigation, the provision of stock water, the storage and distribution of animal feed, stock yards and ramps, but excludes fences, farm tracks, feedlots and silage pits.
Stoney Creek Station Limited	S3.108	Interpretation	Definitions	Amend	Stoney Creek supports the inclusion of a definition for "supporting activity" as per the NPSHPL, to align with the amendments sought to GRUZ-R3 and GRUZ-S3.	Insert a new definition for supporting activity : Has the same meaning as per the National Policy Statement for Highly Productive Land and means: in relation to highly productive land, those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing).
Stoney Creek Station Limited	S3.109	Appendix 5 - NFL-APP - Landscape Values	APP5-NFL-APP	Oppose	Supportive of background information but concerns are raised that the extent, description and attributed values fail to recognise and misrepresent the current land use and values of the area. There is insufficient supporting documentation regarding the extent of the ONL area. Stoney Creek considers that the values listed to be protected are not present over much of the ONL area, which is working farmland and that the ONL area should be reduced. The description does not recognise the character and structures of the station which occupies 42 percent of the area and list qualities of naturalness and wilderness as values to be protected when over 70 percent of the area is a modified pastoral landscape. Pastoral farming can also provide benefits to landscape values through pest and weed management. Croydon Bush Scenic Reserve has distinctively different vegetation form the rest of the ONL, and exotic vegetation has not been listed as a potential threat. The description also does not recognise the historical and cultural values of the Croydon Area which is one of the earliest European settlements in Southland. The Southland Murihiku Regional Landscape Study (Boffa Miskell, 2019) which was relied upon in determining the ONL status should be made publicly available.	Amend Appendix 5 in a way that: - Accurately reflects the significant presence of pastoral farming within the ONL; - Recognises the benefits provided by pastoral farming in terms of maintaining a sense of openness, landscape legibility and pest control, within the ONL; - Recognises that the patterns and values of indigenous biodiversity vary significantly across the extent of the ONL and the highest value area is concentrated within the Croydon Bush SNA; - Corrects the statement that the ONL is free of structures; - Recognises the historical and cultural significance of the area to the rural community; and - Make available all documents referred to within Appendix 5, the s32 Report and the Landscape Assessment prepared by Mike Moore publicly available on the Gore District Council website.
Stoney Creek Station Limited	S3.110	Natural environmental Values map layers	NFL-MAP-Hokonui Hills	Oppose	The spatial extent of the ONL as notified in the Planning Maps is fundamentally flawed. The mapping appears to be carried over from previous versions of the Plan without review or updates.	Amend the Hokonui Hills ONL boundaries to accurately reflect the area of Outstanding Natural Landscape values. Figure 10 of Appendix B [refer to original submission] provides a suggestion of the extent of the ONL area within Stoney Creek station which can be discussed further with the Council, including incorporating evidence provided by a landscape expert at the hearing stage.
Stoney Creek Station Limited	S3.111	Maps	MAP-Additional provisions sought	Amend	Stoney Creek's preferred relief relies upon the establishment of a new precinct to be called the Hokonui Hills Special precinct where rural activities associated with pastoral farming are permitted with appropriate limites to protect the Hokonui Hills.	Insert a new map layer to be called the Hokonui Hills Special Precinct. Replace the underlying zoning of this area (General Rural) with the special precinct zoning.
Stoney Creek Station Limited	S3.112	GRUZ - General Rural Zone	GRUZ-P9	Support	Stoney Creek supports a policy providing for activities with a genuine link with rural land and primary production.	Retain GRUZ-P9 as drafted.

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Stoney Creek Station Limited	S3.113	Interpretation	silage pit	Oppose	This definition is broad and could be taken to include areas for the storage of hay or grain within a silo/container, or small scale storage of bagged feed. Alignment with the definition as per the Proposed Southland Land and Water plan is suggested.	Amend the definition of silage pit as follows: ~~Means an area constructed and used for the purpose of fermentation and storage for animal feed.~~ land or structures on which silage (plant material harvested while green for fodder and kept succulent by partial fermentation, but does not include baleage or hay) is stored, processed or directly utilised, excluding the storage of bales of plant material completely encapsulated in plastic.
Stoney Creek Station Limited	S3.114	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Stoney Creek Station Limited	S3.115	NFL - Natural Features and Landscapes	NFL - General	Oppose	The mapped extent of Hokonui Hills ONL extends beyond the area of outstanding natural values and there is no justification provided for the extent. No evidence provided to suggest that the level of protection provided by the Operative Gore District Plan was insufficient.	Modified pastoral landscape should not be mapped as ONL Reduce restrictions relating to the Hokonui Hills ONL overlay
Stoney Creek Station Limited	S3.116	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Oppose	The provisions were developed in a matter of months after the commencement of the NPSIB which left little space for consultation outside of the formal notification process. A plan change will be necessary to amend rules and map Significant Natural Areas. Blanket protections proposed in the Ecosystems and Indigenous Biodiversity chapter provide little to no ability for essential pastoral farming practices such as fencing and the construction or maintenance of farm tracks to be undertaken without resource consent. The immediate legal effect of the rules within the Ecosystems and Indigenous Biodiversity chapter significantly hinders the ability of Stoney Creek Station (and farmers in general) to effectively manage vegetation on their properties.	Withdraw chapter
Stoney Creek Station Limited	S3.117	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to	Amend as per submission.

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					significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	
Straterra Inc	S135.001	Interpretation	primary production	Support	Definition incorporates mining which is supported.	Retain as notified
Straterra Inc	S135.002	Interpretation	highly productive land	Oppose	The definition does not allow for land containing minerals (as it does in the National Planning Standards).	Not stated.
Straterra Inc	S135.003	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Support	It is supported that mining activities are specified as supported in this area.	Retain as notified
Straterra Inc	S135.004	GRUZ - General Rural Zone	GRUZ-O5	Support	Supports the wording of GRUZ-O5 and recognition of the need to protect highly productive mining land.	Retain as notified
Straterra Inc	S135.005	GRUZ - General Rural Zone	GRUZ-P5	Support	Support this policy.	Note that the benefits of mining relate to the use minerals have to the district and country as well as the jobs, revenue, tax, and economic contribution etc. created by the mining activity itself.
Straterra Inc	S135.006	GRUZ - General Rural Zone	GRUZ-P6	Support	Policy is supported as it is a balanced statement when read alongside GRUZ-P5.	Compensation should be added to the list as this is a recognised way of managing environmental effects as well as mitigating and offsetting.
Straterra Inc	S135.007	GRUZ - General Rural Zone	GRUZ-R1	Support	Supported - note that mining has its own rule.	Retain as notified
Straterra Inc	S135.008	GRUZ - General Rural Zone	GRUZ-R2	Amend	GRUZ-R2 is supported except where it relates to highly productive land as the highly productive land definition in the plan does not currently include land containing minerals.	Amend so that "The activity is not located on Highly Productive Land" be deleted. Or alternatively, the definition of highly productive land should be amended to incorporate landcontaining minerals.
Susan Coulman	S4.001	Whole Plan	Whole Plan	Not Stated	There is a current need for facilitating smaller footprint dwellings and the district plan can allow for and encourage these. It is one of the pillars of future home ownership. The now elderly, baby boom generation are for the most part downsizing their accommodation as they plan for the years ahead. The single dwelling on a large section is an outdated model, the future trend is towards better desinged compact living.	Allow for more than one dwelling on a property where there is servicing infrastructure either on-site or off-site. Allow for caravans and motorhomes without self-containment certification. Reduce the amount of space required to subdivide properties.