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Transpower New Zealand Limited	S101.001	How the Plan works	Statutory Context	Support in part	Generally supports the inclusion of the table but Transpower does not support that table that sets out those statutes and planning instruments that are particularly relevant to the Proposed District Plan on the basis that the table fails to identify the NPSET and NESETA as being relevant. NPSET and NESETA must be considered of particular relevance and therefore should be listed in the table of relevant statutes and planning instruments.	Amend the table in 'Relationship with other Plans and Documents' to include the following: National Policy Statements: The District Plan must give effect to National Policy Statements, including the National Policy Statement on Electricity Transmission and National Environmental Standards: The District Plan must not duplicate, conflict with or otherwise be inconsistent with a National Environmental Standards, including the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009."
Transpower New Zealand Limited	S101.002	How the Plan works	General approach	Support in part	Critical that the Plan clearly states the purpose of the Strategic Direction objectives so that there is no ambiguity in future RMA processes, including in respect of whether there is a hierarchy within the Plan. Transpower supports the description of the 'Plan Structure' and understands that there is no intention for there to be a hierarchy within the provisions of the Proposed District Plan. To make this clear, Transpower supports the inclusion of further explanation of the role of the strategic objectives. It is also suggested that similar text could usefully be included in the Strategic Direction Chapter.	Amend as follows: Part 2 - District Wide Matters This part of the Plan contains the Strategic Directions and the District Wide Matters. 1. The strategic objectives address key strategic and/or significant matters for the District and provide District-wide strategic considerations to guide decision making at a strategic level. It is intended that all other objectives and policies in the District Plan are ~~to be read and achieved in a manner~~ consistent with the strategic objectives. No fixed hierarchy exists between the strategic objectives or between the strategic objectives and the ~~other~~ objectives and policies in ~~other chapters of the District Plan.~~ "
Transpower New Zealand Limited	S101.003	How the Plan works	General approach	Support	Transpower generally supports the description of cross-boundary matters. Cross-boundary matters are particularly relevant to Transpower given the linear and extensive nature of the National Grid	Retain "Water and Infrastructure systems - Including the National Grid" in the list of cross-boundary issues as notified.
Transpower New Zealand Limited	S101.004	Interpretation	conductor	Support in part	Support as it consistent with the definition included in the NESETA , however, it is acknowledged that the inclusion of reference to 'transmission' means that the definition would not apply to conductors that convey electricity as part of the distribution network. For this reason, Transpower would not oppose the definition being amended to refer to an 'electricity transmission line or electricity distribution line".	Retain the definition of 'conductor' as notified or, alternatively, amend the definition as follows: "(a) means wire or cable used for carrying electric current along an electricity transmission line or electricity distribution line ; and (b) includes any hardware and insulation associated with the wire or cable "
Transpower New Zealand Limited	S101.005	Interpretation	critical infrastructure	Support	Definition appropriately includes "the electricity transmission network (the National Grid)" in a manner that reflects the national significance of the National Grid. Supports the PDP giving effect to the relevant provisions of the SRPS that relate to nationally significant, regionally significant and critical infrastructure.	Retain the definition of critical infrastructure as notified.
Transpower New Zealand Limited	S101.006	Interpretation	national grid	Support in part	Transpower seeks minor amendments to the definition to: ensure that the term is capitalised consistently throughout the Proposed District Plan; delete reference to "at the commencement of these regulations" in order to better define the National Grid for the purposes of the District Plan (including for the purpose of new National Grid infrastructure)	Amend the definition of 'national grid' as follows. " ~~N~~ national G rid means the network that transmits high-voltage electricity in New Zealand and that, ~~at the commencement of these regulations,~~ is owned, used or and operated by Transpower New Zealand Limited, including-- (a) transmission lines; and (b) electricity substations"
Transpower New Zealand Limited	S101.007	Interpretation	national grid subdivision corridor	Support in part	Transpower seeks that the definition be retained, subject to minor amendments to ensure that the	Amend the definition of 'national grid subdivision corridor' as follows:" ~~N~~ national G rid subdivision corridor ...

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					term 'National Grid' is capitalised consistently throughout the Proposed District Plan.	
Transpower New Zealand Limited	S101.008	Interpretation	national grid yard	Support in part	Transpower seeks that the definition be retained, subject to minor amendments to: - ensure that the term 'National Grid' is capitalised consistently throughout the Proposed District Plan; and - correct the reference to the voltage of transmission lines on poles 110kv.	Amend as follows: ~~National Grid~~ yard- The area located (as illustrated below): (a) 12 metres in any direction from the outside edge of a National Grid support structure foundation; ~~(b) 12 metres from the boundary of a National Grid substation;~~ (be) 10 metres either side of the centreline of an overhead 110kV National Grid transmission line on poles ~~(cd)~~ 12 metres either side of the centerline of any other overhead National Grid transmission line. ..."
Transpower New Zealand Limited	S101.009	Interpretation	network utilities	Support	Transpower supports the definition of 'network utilities' to the extent that the definition appropriately includes the "transformation, transmission, or distribution of electricity" in a manner that is generally consistent with the definitions in section 166 of the RMA.	Retain the definition of 'network utilities' as notified.
Transpower New Zealand Limited	S101.010	Interpretation	reverse sensitivity	Support	Transpower supports the definition of 'reverse sensitivity' as notified on the basis that the definition appropriately reflects the concept of reverse sensitivity effects in a manner that is consistent with the policy framework in the NPSET.	Retain the definition of 'reverse sensitivity' as notified.
Transpower New Zealand Limited	S101.011	Interpretation	sensitive activity	Support in part	Graveyards or urupā are not considered activities that are sensitive to the National Grid (as set out in the definition in the NPSET) and therefore this clause is inconsistent with the NPSET where this term is used in respect of the National Grid. Transpower considers that clause (g) should be deleted or alternatively caveated so that it does not apply to the National Grid.	Amend the definition of 'sensitive activity' 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, including retirement village and supported residential accommodation. (d) visitor accommodation. (e) places of worship. (f) marae or Papatipu Rūnanga complex. (g) Graveyard or urupā (except that graveyards and urupā are not sensitive activities in respect of the National Grid)
Transpower New Zealand Limited	S101.012	Interpretation	transmission line	Support in part	Transpower supports the definition of 'transmission line' on the basis that the definition is consistent with the definition included in the NESETA. Transpower suggests limited amendments to refine the definition.	Amend the definition of "transmission line" as follows: ~~Has the same meaning as per the National Environmental Standards for Electricity Transmission Activities (2009)~~ Means: (a) the facilities and structures used for, or associated with, the overhead or underground transmission of electricity ~~in~~ on the ~~N~~ ational ~~G~~ rid; and ..."
Transpower New Zealand Limited	S101.013	UFD - Urban form and development	UFD-Additional provisions sought	Oppose	Transpower considers that there is a gap in the UFD Objectives because these objectives fail to address outcomes for nationally significant, regionally significant and/or critical infrastructure despite such infrastructure being essential to support the development of Gore District. Transpower considers that failing to address the provision of, and protection of, critical infrastructure in the Strategic Direction (UFD) Chapter (1) is inconsistent (or not even-handed) with the way in which the Chapter responds to other matters (2) does not give effect to the direction given in SRPS Objective INF.1 and Policies INF.1 and INF.3 (3) does not give effect to the NPSET.	Amend the UFD Chapter to include the following additional Objective: " UFD - X The operation, maintenance, upgrade and development of critical infrastructure is enabled and critical infrastructure is protected from the impacts of incompatible activities. "
Transpower New Zealand Limited	S101.014	ENRG - Energy	ENRG-P8	Support in part	Transpower does not oppose Policy ENRG-P8, but considers that reference to electricity transmission in this Policy is not necessary and may give rise to inconsistent provisions within the Energy, Infrastructure and Transport Chapter. This is because, effects on electricity transmission	Amend Policy ENRG-P8 as follows: "ENRG-P8 Protect electricity generation activities, ~~transmission~~ and associated infrastructure and undeveloped energy resources from reverse sensitivity effects from incompatible subdivision, land use and development."

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					activities and assets are managed by the provisions in the INFR Sub-Chapter.	
Transpower New Zealand Limited	S101.015	INFR - Infrastructure	INFR-Overview	Support in part	Generally supports the 'Overview' but seeks limited amendments to (1) reflect that infrastructure located in Gore, such as the National Grid, may deliver benefits outside of the District also (2) mirror the approach taken in the Energy Sub-Chapter (that refers to the National Policy Statement on Renewable Electricity Generation 2011) by being explicit that the purpose of the Infrastructure Sub-Chapter is, at least in part, to give effect to the NPSET (3) make reference to reverse sensitivity 'effects'.	Amend the 'Overview' as follows: "... It is recognised that infrastructure, and particularly critical infrastructure, is essential to providing for the health, safety and well-being of the people and communities of Gore and beyond . The purpose... (no change)... infrastructure. This chapter must also give effect to the National Policy Statement on Electricity Transmission 2008 (NPSET) where the provisions relate to the National Grid. The NPSET identifies the need to operate, maintain, develop and upgrade the National Grid as a matter of national significance and directs decisionmakers to recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. ... While the use and operation of infrastructure can have adverse effects on adjoining activities and sites, activities adjoining infrastructure can also have adverse effects, including reverse sensitivity effects , on infrastructure."
Transpower New Zealand Limited	S101.016	INFR - Infrastructure	INFR-O1	Support in part	Transpower supports Objective INFR-O1 to the extent that the Objective sets out an outcome where the operation, maintenance, upgrading and development of infrastructure is provided for in a manner consistent with Policy 2 of the NPSET. It is considered that the Objective does not fully give effect to Policy INF.1 of the SRPS or Policy 1 of the NPSET because, the Objective does make reference to the benefits of the National Grid (albeit through generic reference to infrastructure).	Amend Objective INFR-O1 as follows: "INFR-O1 The benefits derived from infrastructure are realised and the The operation, maintenance upgrading and development of infrastructure is provided for to meet the needs of the community and businesses" Recognise the benefits to be derived from, and make provision for, the development, maintenance, upgrade and ongoing operation of regionally significant, nationally significant and critical infrastructure and associated activities. "
Transpower New Zealand Limited	S101.017	INFR - Infrastructure	INFR-O3	Support	Transpower supports Objective INFR-O3 on the basis that the Objective gives effect to Policy INF.3 of the SRPS and because, insofar as it relates to the National Grid, . the Objective reflects the concept of protection in Policies 10 and 11 of the NPSET.	Retain Objective IFR-O3 as notified.
Transpower New Zealand Limited	S101.018	INFR - Infrastructure	INFR-O4	Support	Transpower supports Objective INFR-O4 on the basis that the Objective reflects the range of responses to adverse effects directed by Policy INF.2 of the SRPS and, insofar as the Objective is relevant to the National Grid, appropriate reflects the range of responses to adverse effects directed by the NPSET.	Retain Objective INFR-O4 as notified.
Transpower New Zealand Limited	S101.019	INFR - Infrastructure	INFR-P1	Support	Transpower supports Policy INFR-P1 because the Policy appropriately enables infrastructure in a manner that is generally consistent with Policies 1 and 2 of the NPSET and Policy INF.1 of the SRPS.	Retain Policy INFR-P1 as notified.
Transpower New Zealand Limited	S101.020	INFR - Infrastructure	INFR-P2	Support in part	Does not oppose Policy INFR-P2 on the basis that the Policy recognises that the underground placement may not be practicable or appropriate in all circumstances. In the case of the National Grid, undergrounding National Grid assets is not directed by the NPSET and, while undergrounding the National Grid may be technically feasible, such an outcome may not be appropriate for any number of reasons including cost/investment, security of supply, or ease of repair and maintenance.	Amend Policy INFR-P2 as follows: "INFR-P2 Require the underground placement of network utilities where practical and appropriate having regard to ~~for~~ the functional needs and operational needs of the network utility."
Transpower New Zealand Limited	S101.021	INFR - Infrastructure	INFR-P6	Support in part	Generally supports Policy INFR-P6 to the extent that the Policy addresses effectson the National Grid. However, Transpower considers that the "management" of sensitive activities and the	Amend as follows: "INFR-P6 Adverse effects (including reverse sensitivity effects) are avoided, remedied or mitigated where activities are adjacent to critical infrastructure, including the avoidance-management of sensitive activities near the National Grid and the avoidance of and the effects (including reverse sensitivity effects) of subdivision, use and

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					effects of subdivision, use and development that may compromise the National Grid is inconsistent and less stringent than the policy direction in the NPSET and SRPS. Transpower seeks amendments to the Policy in order to give effect to the NPSET (Policies 10 and 11). Transpower notes that an alternate approach would be to include a standalone policy in respect of the National Grid	development that may compromise the operation, maintenance, upgrade and development of the National Grid."
Transpower New Zealand Limited	S101.022	INFR - Infrastructure	INFR-P7	Support	Transpower supports Policy INFR-P7 on the basis that the Policy reflects the range of responses to adverse effects directed by Objective INFR-O4, Policy INF.2 of the SRPS and, insofar as the Policy is relevant to the National Grid, appropriate reflects the range of responses to adverse effects directed by the NPSET	Retain Policy INFR-P7 as notified
Transpower New Zealand Limited	S101.023	INFR - Infrastructure	INFR - General	Support in part	Generally supportive of the approach to including a note that references national policy statements and national environmental standards, however, Transpower considered that the 'Note' does not correctly reflect the relationship between a district plan and these higher order documents and is inconsistent with more explicit references elsewhere in the Proposed District Plan. Transpower proposes some alternative wording	Amend Note 3 as follows: " Section 55 and Section 75(3) of the RMA directs that the district plan must give effect to any National Policy Statement (NPS) and Section 44A of the RMA, directs local authorities to ensure that there are no duplications or conflicts between the provisions of a National Environmental Standard (NES) and a proposed plan ~~National Environmental Standard (NES)~~ . NES's must be observed and enforced by local authorities. Section 43B of the RMA directs that a NES prevails over District Plan rules unless a NES expressly ~~stated~~ states that it does not. The National Policy Statement on Electricity Transmission 2008 must be given effect to in respect of District Plan provisions that recognise and provide for the National Grid; manage the effects of the National Grid and manage the effects of other activities on the National Grid. The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 include a suite of provisions that provide for the operation, maintenance and upgrading of existing transmission lines. These provisions prevail over any similar provisions in the District Plan. "
Transpower New Zealand Limited	S101.024	INFR - Infrastructure	INFR-R1	Support	Transpower supports Rules INFR-R1 on the basis that a permitted activity status for infrastructure that is located below ground appropriately recognises that the permanent effects of such activities are nil or very minor	Retain Rule INFR-R1 as notified.
Transpower New Zealand Limited	S101.025	INFR - Infrastructure	INFR-R2	Support	Transpower supports Rules INFR-R2 on the basis that a permitted activity status for infrastructure that is located in a building appropriately recognises that the permanent effects of such activities are nil or very minor	Retain Rule INFR-R2 as notified.
Transpower New Zealand Limited	S101.026	INFR - Infrastructure	INFR-R3	Support	Transpower supports Rule INFR-R3 to the extent that the permitted activity conditions generally reflect the regulations for permitted activities in the NESETA, subject to matters raised in this submission in respect of the Standards that apply. In addition, Transpower supports the Matters of Discretion that apply because these matters allow for a consideration of the benefits of infrastructure in a manner that gives effect to the Objective and Policy 1 of the NPSET and Policy INF.1 of the SRPS	Retain Rule INFR-R3 as notified.
Transpower New Zealand Limited	S101.027	INFR - Infrastructure	INFR-R4	Support in part	Transpower supports Rule INFR-R4 on the basis that the Rule provides a consenting pathway that generally gives effect to the NPSET. Transpower particularly supports the 'default' to restricted	Amend Rule INFR-R4(1) and (2) to replicate the Matter of Discretion from Rule INFR-R3 as follows: " The functional and operational needs of, and benefits derived from, the infrastructure, including the potential impact on the levels of service or health and safety

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					discretionary activity status where the permitted activity conditions are not met. That said, Transpower does not support the Matters of Discretion in INFR4(1) and INFR-R4(2) because these matters do not provide for a consideration of the benefits of infrastructure and therefore do not give effect the Objective and Policy 1 of the NPSET and Policy INF.1 of the SRPS.	if the work is not undertaken."
Transpower New Zealand Limited	S101.028	INFR - Infrastructure	INFR-R3	Support	Supports that the permitted activity conditions generally reflect the regulations for permitted activities in the NESETA, subject to matters raised in this submission in respect of the Standards that apply.	Retain Rule INFR-R3 as notified.
Transpower New Zealand Limited	S101.029	INFR - Infrastructure	INFR-R4	Support in part	Support on the basis that the Rule provides a consenting pathway that generally gives effect to the NPSET. Transpower particularly supports the 'default' to restricted discretionary activity status where the permitted activity conditions are not met. That said, Transpower does not support the Matters of Discretion in INFR4(1) and INFR-R4(2) because these matters do not provide for a consideration of the benefits of infrastructure and therefore do not give effect the Objective and Policy 1 of the NPSET and Policy INF.1 of the SRPS.	Amend Rule INFR-R4(1) and (2) to replicate the Matter of Discretion from Rule INFR-R3 as follows: "The functional and operational needs of, and benefits derived from, the infrastructure, including the potential impact on the levels of service or health and safety if the work is not undertaken."
Transpower New Zealand Limited	S101.030	INFR - Infrastructure	INFR-R6	Support	Transpower supports Rule INFR-R6 on the basis that it is consistent with, and gives effect to, Policy 9 of the NPSET and the NESETA Regulations.	Retain Rule INFR-R6 as notified.
Transpower New Zealand Limited	S101.031	INFR - Infrastructure	INFR-R7	Support in part	Opposes the inclusion of a 'default' to discretionary activity status for the following reasons: (a) The Energy and Infrastructure Section 32 Report does not give explicit consideration to the necessary and appropriate activity status; (b) Discretionary activity status is inconsistent with, and does not give effect to, the firm statutory direction in Policies 10 and 11 of the NPSET(c) The High Court has considered Policy 10 and "... A mandatory requirement to ensure that an asset of national significance is not compromised is, in my judgment, a relatively strong directive." (d) Policy 11 of the NPSET requires the identification of a buffer corridor within which it can be expected that sensitive activities will "generally not be provided for in plans and/or given resource consent". (e) Non-complying activity status results in a consistent approach across jurisdictions. See complete submission for further detail.	Amend Rule INFR-R7 as follows: "Activity status where compliance is not achieved: ~~Discretionary~~ Non-complying "
Transpower New Zealand Limited	S101.032	INFR - Infrastructure	INFR-R9	Support	Subject to relief sought elsewhere, Transpower supports Rule INFR-R9 and considers that discretionary activity status is appropriate for new infrastructure in 'protected' areas and, insofar as the Rule relates to the National Grid, consistent with approaches taken to giving effect to the NPSET across New Zealand.	Retain Rule INFR-R9 subject to relief sought below: Rule INFR-R9 as follows: "Activity status: Discretionary Where: 1. The establishment of new infrastructure that has foundations within: (a) an Outstanding Natural Landscape or Feature (b) a Significant Natural Area (c) 20m of the Mataura River or is critical infrastructure in the Mataura River Floodway (d) a site containing an item on the Heritage Schedule, a Notable Tree, a Site of Significance to Māori or an Archaeological Site" (x) land outside of a river and inside of the river side of a Southland Regional Council

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						stopbank"(x) land subject to a high or very high risk of liquefaction, where the infrastructure is critical infrastructure"
Transpower New Zealand Limited	S101.033	INFR - Infrastructure	INFR-R10	Support	Supports Rule INFR-R10 to the extent that the Rule provides a 'default' discretionary activity status for all other infrastructure on the basis that the rule enables a fulsome consideration of any adverse effects of such infrastructure through a resource consent process.	Retain Rule INFR-R10 as notified.
Transpower New Zealand Limited	S101.034	INFR - Infrastructure	INFR-S1	Support in part	Does not oppose Standard INFR-S1, but notes that NZECP34:2001 includes a suite of regulations to manage conductor clearances, including over navigable waterways. Transpower considers that where compliance with the requirements in NZECP34:2001 is achieved, requiring a resource consent is unnecessary and inappropriate duplication of regulation. Transpower therefore seeks that the Standard be amended to ensure that conductors that achieve compliance with NZECP34:2001 do not also trigger the requirement for resource consent. In addition, Transpower supports the Matters of Discretion that apply because these matters allow for a consideration of the benefits of infrastructure in a manner that gives effect to the Objective and Policy 1 of the NPSET and Policy INF.1 of the SRPS.	Amend Standard INFR-S1 as follows: "1. Above-ground lines are to be at least 10m above the water level of a navigable waterbody when at its maximum navigable flow or attached to, and no lower than, existing structures over a navigable waterbody or otherwise comply with NZECP34:2001. "
Transpower New Zealand Limited	S101.035	INFR - Infrastructure	INFR-S2	Support	Support as it sets a clear standard for the permitted height of utility poles and masts in various zones. Transpower's support for this Standard, is based on the assumption that all transmission line support structures would be considered utility poles or masts. Also supports the Matters of Discretion that apply.	Retain Standard INFR-S2 as notified.
Transpower New Zealand Limited	S101.036	INFR - Infrastructure	INFR-S4	Support in part	Supports Standard INFR-S4 to the extent that it 'imports' the zone setbacks for buildings subject to exemptions. Transpower does not support the exemptions included in the Standard on the basis that the exemptions are limited to telecommunications infrastructure. Transpower does not consider that there is clear rationale for providing an exemption for telecommunications infrastructure, but not electricity infrastructure, where the effects of such infrastructure may be the same or similar in character. Transpower seeks that the Standard be expanded to include electricity infrastructure. In addition, Transpower supports the Matters of Discretion that apply	Amend Standard INFR-S4 as follows: "1. Where the utility is a building, it must be set back in accordance with the side, rear and road boundary setbacks for buildings in the zone in which it is located. Except this rule does not apply to: (a) poles, antennas, and associated cabinets (cabinets up to 10m2 in area and 3m in height, exclusive of any plinth or other foundation), for electricity transmission, electricity distribution , telecommunication and radio communication; (b) lines and support structures for telecommunications or electricity transmission and electricity distribution ; (c) network utilities within legal road."
Transpower New Zealand Limited	S101.037	INFR - Infrastructure	INFR-S5	Support in part	Does not oppose Standard INFR-S5, but seeks that the Standard is clarified to confirm that the Standard is not intended to regulate activities that are managed by the Regional Council or activities that traverse (but do not disturb) the areas subject to the setbacks in the Standard. That said, Transpower does not support the Matters of Discretion because these matters do not provide	Amend Standard INFR-S5 as follows: "1. The foundation of a Any infrastructure building or structure must not be located within the following -be set back from the closest bank of any stream or river as follows: (...) Amend Standard INFR-S5 Matters of Discretion as follows: " x. The benefits derived from, the infrastructure, including the potential impact on the levels of service or health and safety if the work is not undertaken. "

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					for a consideration of the benefits of infrastructure and therefore do not give effect the Objective and Policy 1 of the NPSET and Policy INF.1 of the SRPS.	
Transpower New Zealand Limited	S101.038	INFR - Infrastructure	INFR-S6	Oppose	The Standard has the potential to impose more stringent requirements on buildings for infrastructure, when compared to the same footprint requirements in any given zone. The Energy and Infrastructure Section 32 Report does not give any rationale for taking a more stringent approach to the footprint of infrastructure buildings when compared to other buildings. Transpower seeks that the Standard is amended so that infrastructure buildings may be developed in a manner that is consistent with the zone in which they are located.	Amend Standard INFR-S6 as follows: "The maximum footprint of any utility building or structure shall comply with the relevant building coverage provisions for the zone they are located in or otherwise be: (...)
Transpower New Zealand Limited	S101.039	INFR - Infrastructure	INFR-S9	Support	Transpower supports Standard INFR-S9 on the basis that it is consistent with, and gives effect to, Policy 19 of the NPSET and the NESETA Regulations.	Retain Standard INFR-S9 as notified.
Transpower New Zealand Limited	S101.040	CL - Contaminated Land	CL-P2	Support	Transpower supports Policy CL-P2 on the basis that the Policy directs that contaminated land is managed to a level appropriate for the intended use. Such an approach is appropriate for Transpower's substations that are considered 'contaminated land', but continue to be appropriately used as substations.	Retain Policy CL-P2 as notified.
Transpower New Zealand Limited	S101.041	NH - Natural Hazards	NH-O4	Support in part	Transpower notes that the term 'regionally significant infrastructure has generally been replaced with 'critical infrastructure' in the Proposed District Plan. Transpower therefore considers that this Objective should refer to 'critical infrastructure'. It is not always possible for infrastructure to be located outside of hazard risk areas because: (a) Transpower is required to connect to electricity generation that may be located in a hazard risk area; and (b) linear infrastructure, such as the National Grid, necessarily traverses areas susceptible to hazards (such as rivers) in order to convey electricity over long distances between two points. These requirements are generally understood to be operational needs and functional needs. Transpower considers that reference to these needs more clearly sets out the circumstances where avoidance is not practicable.	Amend Objective NH-O4 as follows: "NH-O4 ~~Regionally significant~~ Critical infrastructure is located outside hazard risk areas except where there is an operational need or functional need for its location where practicable. "
Transpower New Zealand Limited	S101.042	NH - Natural Hazards	NH-P6	Support in part	As above, it is not always possible for infrastructure to be located outside of hazard risk areas. These requirements are generally understood to be operational needs and functional needs. Transpower considers that imposing a test of "no reasonable alternative" as well as "operational or functional need" is unnecessary and confusing. For this reason, Transpower seeks that reference to there being no reasonable alternative is deleted. In addition, Transpower considers that the initial	Amend Policy NH-P6 as follows: "NH-P6 Avoid the placement of critical infrastructure in identified and mapped areas subject to natural hazards ~~as at risk from natural hazards,~~ unless: 1. there is ~~no reasonable alternative due to the~~ an operational need or functional need for the location; and 2. it will be designed to ~~maintain its integrity and function to~~ the fullest possible extent, even though this may be at a reduced level , during and after a natural hazard event, or can be readily re-instated after a natural hazard event; and 3. any significant adverse effects on people, cultural values, and property will be avoided or mitigated to the extent practicable. "

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					clause of the Policy should clearly articulate where the Policy is intended to apply. Transpower seeks the inclusion of reference to the areas identified under Policy NH-P1. Transpower considers that clause (2) of the Policy is unnecessary on the basis that the intent of this clause appears to mirror the obligation on lifeline utilities under section 60 of the Civil Defence Emergency Management Act 2002 ("CDEMA"). For this reason, Transpower seeks amendments to clause (2) to ensure the obligation under the Proposed District Plan is that same as directed by the CDEMA. the Natural Hazards Section 32 Report does not clearly articulate the types of effects that are to be avoided and why the option to mitigate any such effects is not available. In this regard, it is considered that 'avoidance' goes beyond the direction to manage significant risks in section 6 of the RMA and, as such, Transpower seeks that mitigation is also available to address the effects of critical infrastructure in hazard risk areas.	
Transpower New Zealand Limited	S101.043	NH - Natural Hazards	NH-R4	Oppose	Opposes Rules NH-R4 on the basis that the Rule, insofar as it relates to the National Grid, fails to give effect to the NPSET. Non-complying activity status does not give effect to the NPSET; is more stringent than the 'avoid, remedy or mitigate' direction in the SRPS; and is inconsistent with Policy NH-P6 that does not prevent critical infrastructure that has an operational need or functional need for its location. Further, it is not clear why infrastructure that is not 'critical' is not similarly managed (and therefore is subject to a less stringent rule regime. Transpower considers that the development of critical infrastructure in the Mataura River Floodway may be better managed under Rule INFR-R9 and excluded from Rule NH-R4.	Amend Rule NH-R4 as follows: "Activity status: Non-Complying Where: 1. The following activity is undertaken: (a) new structures or building, that is not critical infrastructure ; (b) ~~critical infrastructure~~ (c) Sensitive Activities." As a consequence, amend Rule INFR-R9 as stated in provision submission
Transpower New Zealand Limited	S101.044	NH - Natural Hazards	NH-R5	Oppose	Transpower opposes Rule NH-R5 and considers that it is not clear whether the Rule is intended to regulate infrastructure activities. On the assumption that Rule NH-R5 is intended to apply to the National Grid, Transpower considers that the Rule fails to give effect to the NPSET. The National Grid has an operational need and a functional need to be located on the river side of a stop bank (being linear infrastructure that must cross rivers). The non-complying activity status does not give effect to the NPSET; is more stringent than the 'avoid, remedy or mitigate' direction in the SRPS; and is inconsistent with Policy NH-P6 that does not prevent critical infrastructure that has an operational need or functional need for its location. Transpower considers that the development of critical infrastructure in the on the river side of	Amend Rule NH-R5 as follows: "Activity Status: Non-complying Where: 1. The activity is not infrastructure and involves constructing new buildings or structures, or additions to an existing building or structure on the river side of a Southland Regional Council stopbank." As a consequence, amend Rule INFR-R9- as stated in provision

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					stopbanks may be better managed under Rule INFR-R9 and excluded from Rule NH-R5.	
Transpower New Zealand Limited	S101.045	NH - Natural Hazards	NH-R6	Oppose	Opposes Rules NH-R6 on the basis that the Rule, insofar as it relates to the National Grid, fails to give effect to the NPSET. The non-complying activity status does not give effect to the NPSET; is more stringent than the 'avoid, remedy or mitigate' direction in the SRPS; and is inconsistent with Policy NH-P6 that does not prevent critical infrastructure that has an operational need or functional need for its location. Further, it is not clear why infrastructure that is not 'critical' is not similarly managed (and therefore is subject to a less stringent rule regime. Further, the Natural Hazards Section 32 Report fails to clearly articulate the risk of liquefaction to the National Grid, such that non-complying activity status is necessary or appropriate. In this regard, it is noted that liquefaction did not significantly compromise the National Grid during the Christchurch earthworks and that the National Grid is designed to be resilient to the natural hazards in any given receiving environment. Transpower considers that the development of critical infrastructure on land subject to a high or very high risk of liquefaction may be better managed under Rule INFR-R9 and Rule NH-R6 may be deleted.	Delete Rule NH-R6 in its entirety. Amend Rule INFR-R9 as stated in that provision
Transpower New Zealand Limited	S101.046	HH - Historical Heritage	HH-R5	Support in part	Transpower does not oppose Rule HH-R5 on the basis that the Rule provides for land disturbance for the maintenance, upgrading and repair of existing infrastructure or above ground network utilities or additional excavation on or near scheduled archaeological sites. That said, Transpower considers that the inclusion of rules in the Proposed District Plan in respect of archaeological sites is unnecessary duplication of the requirements of the Heritage New Zealand Pouhere Taonga Act 2014. On this basis, Transpower supports the deletion of Rule HH-R5.	Delete Rule HH-R5 in its entirety.
Transpower New Zealand Limited	S101.047	TREE - Notable Trees	TREE-P4	Support in part	Transpower is concerned that the Policy directs that trimming can be undertaken only where there is a 'high' quantifiable risk, rather than any quantifiable risk. Transpower considers that any risk to the National Grid caused by trees is unacceptable and has the potential to have significant impact on many people and communities. For this reason, Transpower supports the deletion of 'high' in Policy TREE-P4.	Amend Policy TREE-P4 as follows: "TREE-P4 Subject to being undertaken in accordance with recognised arboricultural practices, or where relevant, Māori cultural practices, enable: (...) (c) there is a ~~high~~ quantifiable risk to people, property, buildings or infrastructure; or (...)
Transpower New Zealand Limited	S101.048	TREE - Notable Trees	TREE-P5	Support in part	Transpower is concerned that the Policy directs that removal can be undertaken only where there is a 'high' quantifiable risk, rather than any quantifiable risk. Transpower considers that any risk to the National Grid caused by trees is unacceptable and has the potential to have significant impact on many people and	Amend Policy TREE-P5 as follows: TREE-P5 Avoid the removal of a notable tree or trees within notable groups of trees unless at least one of the following circumstances apply: (...) 2. there is a ~~high~~ quantifiable risk to people, property, buildings or infrastructure.

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					communities. For this reason, Transpower supports the deletion of 'high' in Policy TREE-P5.	
Transpower New Zealand Limited	S101.049	TREE - Notable Trees	TREE-R1	Oppose	The Rule requires a resource consent for an activity that is mandatory. That is, complying with the regulations is mandatory and the trimming must be done. The purpose for the trimming is clear and set out in Regulation 3 as follows: "The purpose of these regulations is to protect the security of the supply of electricity, and the safety of the public, by-- (a) prescribing distances from electrical conductors within which trees must not encroach; and (b) setting rules about who has responsibility for cutting or trimming trees that encroach on electrical conductors; and (c) assigning liability if those rules are breached; and (d) providing an arbitration system to resolve disputes between works owners and tree owners about the operation of these regulations." Transpower considers that a further regulatory process where the trimming must occur is not appropriate, efficient or effective (including in respect of any evaluation under section 32 of the RMA).	Amend Rule TREE-R1 as follows: "Activity status: Permitted Where: (...) 2. Except for the removal of broken branches, deadwood or diseased vegetation, trimming is of branches which are less than 75mm in diameter; or 3. Trimming is required to: a. remove a potential fire risk associated with the National Grid; or b. for the safe operation or maintenance of the National Grid, including access for these purposes and as required by the Electricity (Hazards from Trees) Regulations 2003. Activity status where compliance is not achieved with: ~~TREE-R1(1) and TREE-R1(2): Controlled Where: 3. The trimming is required under the Electricity (Hazards from Trees) Regulations 2003.~~ "
Transpower New Zealand Limited	S101.050	TREE - Notable Trees	TREE-R2	Oppose	Transpower's view that 'high' quantifiable risk is too great a threshold when considering risks to the National Grid. For the reasons set out in respect of Policy TREE-P5, Transpower therefore seeks that Rule TREE-R2 does not reference "high". Transpower does not support Rule TREE-R2 on the basis that the Rule requires a resource consent for an activity that would be mandatory under the Electricity (Hazards from Trees) Regulations 2003. That said, these Regulations direct the cutting or trimming of a tree only to the extent necessary, and do not direct the felling of trees. On this basis, there is no need for Rule TREE-R2 to reference the Electricity (Hazards from Trees) Regulations 2003. As a final matter, in order to give effect to Policy 1 of the NPSET and Policy INF.1 of the SRPS, Transpower seeks that the benefits of the removal (including the benefits of the infrastructure that is protected) are a matter of control.	Amend as follows: "Activity status: Controlled- Where: 1. There are changes to the tree or group of trees, arising from natural events, which results in the tree(s) no longer meeting the STEM threshold to be classed as notable; or 2. There is a ~~high~~ quantifiable risk to people, property, buildings or infrastructure. Matters of control: 1. Arboricultural advice confirms that the tree(s) no longer meets the STEM threshold to be classed as notable. 2. The health, shape, form and ongoing viability of the notable tree. 3. The necessity of what is proposed, including the benefits to the health, safety and wellbeing of people and communities , and alternatives. Activity status where compliance is not achieved with: ~~TREE-R2(1) and TREE-R2(2): Discretionary Where: 3. The removal is subject to a notice issued under the Electricity (Hazards from Trees) Regulations 2003. TREE-R2(3): Non-complying~~
Transpower New Zealand Limited	S101.051	ECO - Ecosystems and Indigenous Biodiversity	ECO-O3	Support in part	Transpower supports the intent of Objective ECO-O3 to the extent that the Objective recognises that activities in SNAs may be appropriate. However, Transpower considers that the Objective is more stringent than is appropriate or required by RMA or the SRPS and seeks that the Objective better reflects Policy BIO.2 of the SRPS.	Amend Objective ECO-O3 as follows: ECO-O3 Provide for appropriate subdivision, use and development within Significant Natural Areas where the values of the area ~~can be~~ are maintained or and, where appropriate , enhanced.
Transpower New Zealand Limited	S101.052	ECO - Ecosystems and Indigenous Biodiversity	ECO-P2	Support in part	Transpower acknowledges that clause 3 of the Policy includes reference to an activity having a functional need for its location (it can only occur in that environment). However, Transpower considers that it is equally important to provide for activities that have an operational need for a location. That is, the need to traverse, locate or operate in a	Amend Policy ECO-P2 (...) 3. The activity has a functional need or operational need to be located in the area; or 4. (...)

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					particular environment because of technical, logistical or operational characteristics or constraints. Transpower seeks an amendment to Policy ECO-P2 to reference 'operational need'. Such an approach is consistent with the direction in Policy 3 of the NPSET.	
Transpower New Zealand Limited	S101.053	ECO - Ecosystems and Indigenous Biodiversity	ECO-P3	Support in part	The Ecosystems and Indigenous Biodiversity Section 32 Report confirms that Policy ECO-P3 is to give effect to the NPSIB. Clause 1.3(3) of the NPSIB confirms that the NPSIB does not apply to the National Grid as follows: "(3) Nothing in this National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities. For the avoidance of doubt, renewable electricity generation assets and activities, and electricity transmission network assets and activities, are not "specified infrastructure" for the purposes of this National Policy Statement." For this reason, Transpower seeks that the Policy is explicit in excluding the National Grid.	Amend ECO-P3 as follows: (...) Unless they relate to: x. The operation, maintenance, upgrading and development of the National Grid; (...)
Transpower New Zealand Limited	S101.054	ECO - Ecosystems and Indigenous Biodiversity	ECO-P4	Oppose	The Ecosystems and Indigenous Biodiversity Section 32 Report confirms that Policy ECO-P4 is to give effect to the NPSIB. Because the NPSIB does not apply to the National Grid, it is inappropriate to impose a requirement to comply with the effects management hierarchy from the NPSIB (and embedded in Policy ECO-P4) on the National Grid, particularly because the NPSET includes specific approaches to the management of effects of the National Grid. Transpower therefore seeks that the Policy does not apply to the National Grid.	Amend Policy ECO-P4 as follows "With the exception of the operation, maintenance, development and upgrading of the National Grid, m Manage any adverse effects on an SNA from a new subdivision, use or development relating to the following matters in accordance with the effects management hierarchy: ..."
Transpower New Zealand Limited	S101.055	ECO - Ecosystems and Indigenous Biodiversity	ECO-P11	Oppose	Transpower opposes Policy ECO-P11 to the extent that the Policy directs the offsetting of adverse effects. Transpower does not oppose the offsetting of residual effects, but considers that (for the National Grid where the NPSIB does not apply) offsetting measures should be offered, as required by the RMA (for instance, as required by section 104). Similarly, the NPSET does not requiring offsetting.	Amend ECO-P11 as followings: ECO-P11 Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity where: x. the offsetting measures are proposed or agreed to by an applicant or requiring authority; (...)
Transpower New Zealand Limited	S101.056	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Support in part	Supports Rule ECO-R1 on the basis that the Rule provides for indigenous vegetation clearance for the safe operation or maintenance of the National Grid as a permitted activity. Such an approach gives effect to Policy 2 and Policy 5 of the NPSET and is appropriately aligned with the NESETA. That said, Transpower does not support Rule ECO-R1 to the extent that the Rule applies a non-complying activity status to indigenous vegetation clearance and land disturbance for new or upgraded National Grid assets in an SNA. Such a stringent activity status is not necessary or appropriate, particularly	Amend Rule ECO-R1 as follows: "Activity status where compliance is not achieved with ECOR1(1)(a)(i), ~~or~~ ECO-R1(1)(a)(vi) or ECO-R1(d): Restricted discretionary (...)Matters of Discretion: (...) x. The benefits of the National Grid."

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					when compared to the same activity regulated by the NESETA. Transpower therefore supports amending the Rule to provide for indigenous vegetation clearance for the National Grid (upgrading or development as a restricted discretionary activity, consistent with Regulation 32 of the NESETA.	
Transpower New Zealand Limited	S101.057	NFL - Natural Features and Landscapes	NFL-P1	Oppose	Transpower opposes Policy NFL-P1 on the basis that, to the extent the Policy applies to the National Grid, the Policy is inconsistent with the direction for the management of the National Grid in and on natural features and landscapes in the NPSET. That is, Policy 8 of the NPSET does not direct absolute avoidance, but rather directs that development of the National Grid in rural environments "seeks to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities". Further, it is not clear how Policy NFL-P1 is intended to relate to Policy NFL-P3. It is considered that the two policies may give differing directions and give rise to the potential for tension between the two provisions. Transpower suggests that it may be more appropriate to make Policy NFLP3 an exception from Policy NFL-P1 to resolve the tension and provide a bespoke direction for critical infrastructure that responds to the particular characteristics and constraints of such infrastructure.	Amend Policy NFL-P1 as follows: "NFL-P1 Except where NFL-P3 applies, a Avoid adverse effects on the values and characteristics of identified outstanding natural features and landscapes described within Appendix 5 by:
Transpower New Zealand Limited	S101.058	NFL - Natural Features and Landscapes	NFL-P3	Support in part	Policy 3 of the NPSET requires that: "When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network." It is considered that clause 1 of the Policy, subject to limited amendments mirrors the recognition of technical and operational requirements in respect of location. However, clause 2 of the Policy fails to give similar consideration to the extent to which it is practicable for the effects of the National Grid to be avoided or mitigated. The Preamble to the NPSET acknowledges this and states that: "Technical, operational and security requirements associated with the transmission network can limit the extent to which it is feasible to avoid or mitigate all adverse environmental effects." Transpower therefore seeks an amendment to clause 2 to reflect the limitations on the able to avoid or mitigate adverse effects and to therefore give effect to the NPSET.	Amend Policy NFL-P3 as follows: "NFL-P3 Avoid the placement of critical infrastructure within identified outstanding natural features and landscapes, unless, having regard to the operational needs or functional needs of the activity 1. There is no reasonable alternative ~~due to the operational or functional need~~ for the location; and 2. Adverse effects on landscape values can be avoided or appropriately mitigated to the extent feasible. "

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Transpower New Zealand Limited	S101.059	NFL - Natural Features and Landscapes	NFL-P4	Support in part	Transpower generally supports Policy NFL-P4 but seeks limited amendments to clause (3) to better refer to operational needs and to delete the superfluous reference to Outstanding Natural Features or Landscapes. In addition, Transpower seeks the inclusion of reference to the benefits of the proposed activity as a relevant consideration. Such an approach is consistent with the Objective and Policy 1 of the NPSET.	Amend Policy NFL-P4 as follows: NFL-P4: (...) 3. The operational needs or functional needs of for the activity to be undertaken within an Outstanding Natural Feature or Landscape. x. The benefits of the proposed activity to the health, safety and wellbeing of people and communities."
Transpower New Zealand Limited	S101.060	NFL - Natural Features and Landscapes	NFL-R4	Oppose	In Transpower's view there are opportunities to set out the provisions more clearly by relocating Rule NFL-R4 to the Infrastructure Sub-Chapter and including further direction in the Note.	Delete Rule NFL-R4 As a consequence, amend Note 1. (Amendments listed under NFL-general)
Transpower New Zealand Limited	S101.061	NFL - Natural Features and Landscapes	NFL - General	Oppose in part	Transpower does not support Note 1 on the basis that the Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct that rules apply to infrastructure in addition to the rules in the Infrastructure Chapter generally. Further, The Natural Features and Landscapes Sub-Chapter includes a rule in relation to the maintenance of critical infrastructure but does not address upgraded or new infrastructure. This would result in Rule LLRZ-R12 applying and all infrastructure activities being noncomplying activities. Transpower seeks that Note 1 is amended to explicitly set out that the General Industrial Zone rules do not apply to infrastructure.	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. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do not apply to infrastructure activities."
Transpower New Zealand Limited	S101.062	PA - Public Access	PA-P5	Oppose	Transpower generally supports the maintenance of public access, but notes that there may be situations where, for instance, work is occurring on transmission lines or substations and it is appropriate and necessary to restrict public access in order to protect the operation of the National Grid and provide for the safety of people. Transpower seeks that this is recognised in Policy PA-P5.	Amend Policy PA-P5 as follows: "Restrict public access in areas that would result in adverse effects on critical infrastructure , natural character, indigenous biodiversity, historic heritage, cultural, or landscape values. "
Transpower New Zealand Limited	S101.063	SUB - Subdivision	SUB-O4	Oppose	Transpower does not support Objective SUB-O4 as currently drafted on the basis that the Objective fails to recognise the potential impact of subdivision on the National Grid in a manner that gives effect to Policies 10 and 11 of the NPSET. Transpower seeks limited amended to address this by inserting reference to subdivision design protecting of physical resources, as well as natural resources.	Amend Objective SUB-O4 as follows: SUB-O4 Subdivisions are designed and developed in a way that: 1. protects significant physical , natural, ecological, historical and cultural features, values and resources, 2. (...)
Transpower New Zealand Limited	S101.064	SUB - Subdivision	SUB-P3	Oppose	Transpower opposes the subdivision policies to the extent that the policies fail to appropriately address the potential impacts of subdivision on the National Grid in a manner that gives effect to the NPSET (and particularly Policies 10 and 11). The management of subdivision in the vicinity of the National Grid is crucial to ensuring the ongoing	Amend Policy SUB-P3 as follows: "SUB-P3 Ensure subdivisions are designed to avoid and manage effects from site constraints, including but not limited to topography, ~~the national grid~~ , and significant natural areas." And as a consequent, " SUB-PX. Avoid subdivision in the National Grid subdivision corridor where future activities may result in adverse effects on the National Grid, including reverse sensitivity effects, that would compromise the operation, maintenance, upgrading and development of the National Grid."

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					operation, maintenance and upgrading of the National Grid. This is achieved by subdivision layouts that maintain the integrity of the National Grid Yard and secure Transpower's access to the National Grid. Transpower is of the view that Policy SUB-P3 does not clearly achieve the outcomes directed by the NPSET. Transpower notes that the Proposed District Plan includes a separate policy (SUB-P5) in relation to subdivision near state highways and Transpower seeks the inclusion of a similar provision in respect of the National Grid.	
Transpower New Zealand Limited	S101.065	SUB - Subdivision	SUB-Additional provisions sought	Oppose	Opposes the rules that relate to subdivision on the basis that the rules do not include a rule that provides for the creation of an allotment for the purposes of accommodating a network utility. This is a common approach in many district plans and allows for the rule to include relaxed standards on the basis that network utilities have different characteristics and needs in terms of size and servicing and broad benefits to the community.	Amend the subdivision rules to include the following new rule: SUB-RX Subdivision for network utilities: All Zones: Activity status: permitted Where: 1. The subdivision creates an allotment for the purpose of any unstaffed network utilities, accessway or road. Activity status where compliance not achieved: N/A
Transpower New Zealand Limited	S101.066	SUB - Subdivision	SUB-Additional provisions sought	Oppose	Transpower opposes the Rules that related to subdivision on the basis that the rules do not include a rule that addresses subdivision in the National Grid Subdivision Corridor (defined and addressed earlier in this comments). Transpower seeks the inclusion of a nationally consistent rule that applies in the National Grid Subdivision Corridor.	Include the new rule: SUB-RX Subdivision in the National Grid Subdivision Corridor: All Zones: Activity status: restricted discretionary Where: 1. a building platform is identified on the subdivision plan that is outside of the National Grid Yard, to be secured by way of a consent notice. Matters of discretion 1. The extent to which the subdivision allows for earthworks, buildings and structures to comply with the requirements of NZECP34:2001. 2. The provision for the ongoing efficient operation, maintenance, development and upgrade of the National Grid, including the ability for continued reasonable access to existing transmission lines for maintenance, inspections and upgrading. 3. The extent to which potential adverse effects (including visual and reverse sensitivity effects) are mitigated through the location of an identified building platform or platforms. 4 The extent to which the design and construction of the subdivision allows for activities to be set back from the National Grid, including the ability to ensure adverse effects on, and from, the National Grid and on public safety and property are appropriately avoided, remedied or mitigated, for example, through the location of roads and reserves under the transmission lines. 5. The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid. 6. The outcome of any consultation with Transpower New Zealand Limited. 7. The extent to which the subdivision plan clearly identifies the National Grid and identified building platform or platforms. Notification An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified only to Transpower New Zealand Limited, where the consent authority considers this is required, absent its written approval. Activity status where compliance not achieved: Non-complying
Transpower New Zealand Limited	S101.067	ASW - Activities on the Surface of Water	ASW-P3	Support in part	The Policy appropriately enables infrastructure to be located above the surface of waterbodies where there is a functional need. However, Transpower considers that it is equally important to provide for activities that have an operational need for locating above a waterbody. That is, the need to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints. Transpower seeks an amendment to Policy ASW-P2 to reference 'operational need'. Such an approach is consistent with the direction in Policy 3 of the NPSET.	Amend Policy ASW-P3 as follows: "ASW-P3 Enable the location of infrastructure and equipment used for monitoring or testing, where there is a functional need or operational need for this to be located on or above the surface of waterbodies"

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Transpower New Zealand Limited	S101.068	ASW - Activities on the Surface of Water	ASW-R3	Support	Transpower supports Rule ASW-R3 because the Rule provides for the operation, maintenance and upgrading of infrastructure in a manner that gives effect to Policy 2 and Policy 5 of the NPSET.	Retain Rule ASW-R3 as notified.
Transpower New Zealand Limited	S101.069	EW - Earthworks	EW-P2	Support	Transpower supports Policy EW-P2 because the Policy is consistent with, and gives effect (in part) to, Policy 10 of the NPSET.	Retain Policy EW-P2 as notified.
Transpower New Zealand Limited	S101.070	EW - Earthworks	EW - General	Support in part	Generally supports the concept of including a list of limited earthworks and land disturbance activities that are exempt from the Rules in the Proposed District Plan. However, Transpower is concerned that the exemptions are inconsistent with NZECP34:2001 such that, activities that are regulated by NZECP34:2001 and have the potential to have an impact on the National Grid are included in the exemptions and are therefore not regulated by Rule EW-R12. Transpower seeks that, for the purposes of Rule EW-R12 align with the exemption in 2.2.4 of NZECP34:2001 as follows: "2.2.4 Nothing in clauses 2.2.1 - 2.2.3 applies in respect of normal agricultural cultivation or the repair, sealing, or resealing of the existing surface of any road, footpath, or driveway"	Amend the Rules as follows: Earthworks and Land Disturbance of the following activities are exempt from the rules in this chapter, other than Rule EWR12 , of the District Plan: ... As a consequence, embed the exemptions in NZECP34:2001 in Rule EW-R12.
Transpower New Zealand Limited	S101.071	EW - Earthworks	EW-R11	Support	Transpower supports the inclusion of a specific rule that relates to earthworks and land disturbance for network utilities, including access tracks. Transpower particularly supports the approach to having a maximum area open at any time (as opposed to a maximum per year or per site). For the avoidance of doubt, Transpower notes that this rule should apply in all areas of the District including those subject to overlays.	Retain Rule EW-R11 as notified.
Transpower New Zealand Limited	S101.072	EW - Earthworks	EW-R12	Support in part	Transpower supports Rule EW-R12 on the basis that the Rule reflects Transpower's nationally consistent approach to the management of earthworks in the vicinity of the National Grid in order to give effect to Policy 10 of the NPSET. That said, Transpower considers that there is no need for the Rule to exclude specified overlays and therefore seeks that the exclusions be deleted. Further, there are some land disturbance activities (for instance, the installation of fence posts) that are regulated by NZECP34:2001. For this reason, Transpower has amended the rule to also apply to land disturbance.	Amend Rule EW-R12 as follows: Rule EWR12 Earthworks and land disturbance within National Grid Yards: All Zones— ~~Excluding Historic Heritage sites, Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ Earthworks and land disturbance within National Grid Yards Activity status: Permitted Where, within the National Grid Yard: 1. The depth of the earthworks or land disturbance is no greater than 300mm within 6m of the outer edge of the visible foundation of a National Grid support structure; and x. The depth of the earthworks or land disturbance is no deeper than 3 metres when located between 6 metres and 12 metres from the National Grid Support Structure; and 2. The stability of the National Grid support structure is not compromised; and 3. Physical and practical access to the National Grid support structures is maintained; and 4. The earthworks or land disturbance does not result in a reduction in the ground to conductor clearance distances, below what is required by Table 4 of NZECP34:2001; and 5. The e Earthworks ~~that~~ otherwise comply with clause 2.4.1 of NZECP34:2001. Note: ~~Clauses (1)-Rule EW-R12 above~~ does not apply to earthworks or land disturbance: 1. (...) Activity status where compliance is not achieved: Noncomplying
Transpower New Zealand Limited	S101.073	NOISE - Noise	NOISE-R9	Support in part	Transpower is concerned that the Rule does not contemplate the use of helicopters for inspections, maintenance and upgrading of the National Grid. Transpower seeks that Rule NOISE-R9 explicitly allow for such use in order to give effect to Policy 2 and Policy 5 of the NPSET. (...)	Amend Rule NOISE-R9 as follows: "Activity status: Permitted Where: x. The take-off and landing are to and from a location adjacent to the National Grid where the helicopter use is for the operation, maintenance and upgrading of the National Grid; or 1. The take-off and landing are to and from a helicopter landing area which is:

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Transpower New Zealand Limited	S101.074	SIGN - Signs	SIGN-R1	Support	Transpower supports the inclusion of a rule that provides for official signs as a permitted activity without the need to achieve compliance with any standards.	Retain Rule SIGN-R1 as notified.
Transpower New Zealand Limited	S101.075	LLRZ - Large Lot Residential Zone	LLRZ-O3	Oppose	Transpower opposes Objective LLRZ-O3, because the Objective: (a) fails to anticipate the presence of critical infrastructure in the Zone; and (b) has the effect of preventing critical infrastructure due to the requirement to be in keeping with the scale and intensity of development anticipated by the zone in a manner that is contrary to the NPSET. The Preamble to the NPSET notes that the National Grid can create significant adverse effects and that the technical, operational and security requirements associated with the National Grid can limit the extent to which it is feasible to avoid or mitigate all adverse effects. It is these characteristics of the National Grid that the NPSET responds to.	Amend Objective LLRZ-O3 as follows: "LLRZ-O3 Non-residential activities in the Large Lot Residential Zone are limited to those activities that provide for the health and well-being of the community or those that and preserve residential character and amenity by being in keeping with the scale and intensity of development anticipated by the zone. "
Transpower New Zealand Limited	S101.076	LLRZ - Large Lot Residential Zone	LLRZ-O4	Oppose	Transpower opposes Objective LLRZ-O4 because the Objective does not give effect to Policy 10 and Policy 11 of the NPSET due to the Objective directing an outcome of effects being minimised, as opposed to being avoided (insofar as the Objective relates to the National Grid). Further, it is possible that this Objective is inconsistent with, or in conflict with, the provisions that protect infrastructure in the Infrastructure Chapter.	Amend Objective LLRZ-O4 as follows: "LLRZ-O4 Development is provided with appropriate infrastructure and adverse effects on infrastructure networks are managed so that the operation, maintenance, upgrade and development of the infrastructure is not compromised ~~minimised~~ "
Transpower New Zealand Limited	S101.077	LLRZ - Large Lot Residential Zone	LLRZ-P8	Oppose	Transpower opposes Policy LLRZ-P8 on the basis that the Policy has the potential to prevent the upgrade and development of the National Grid in the Large Lot Residential Zone because the Policy includes a requirement to 'avoid'. Transpower considers that expression in this Policy does not give effect to the NPSET or the SRPS.	Amend Policy LLRZ-P8 as follows: "LLRZ-P8 Avoid activities that are incompatible with the character, qualities and purpose of the Large Lot Residential Zone except where the activity is critical infrastructure that has a functional need or operational need for its location "
Transpower New Zealand Limited	S101.078	LLRZ - Large Lot Residential Zone	LLRZ - General	Oppose	The Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct that the Large Lot Residential Zone rules apply to infrastructure in addition to the rules in the Infrastructure Chapter. This would result in Rule LLRZ-R12 applying and all infrastructure activities being non-complying activities. Transpower seeks that Note 1 is amended to explicitly set out that the General Industrial Zone rules do not apply to infrastructure.	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. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do not apply to infrastructure activities. "
Transpower New Zealand Limited	S101.079	GRZ - General Residential Zone	GRZ-O4	Oppose	The Objective does not give effect to Policy 10 and Policy 11 of the NPSET due to the Objective directing an outcome of effects being mitigated, as opposed to being avoided (insofar as the Objective relates to the National Grid). Further, it is possible that this Objective is inconsistent with, or in conflict with, the provisions that protect	Amend Objective GRZ-O4 as follows: GRZ-O4 Development is provided with appropriate infrastructure and adverse effects on infrastructure networks are managed so that the operation, maintenance, upgrade and development of the infrastructure is not compromised ~~mitigated.~~

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					infrastructure in the Infrastructure Chapter. Transpower seeks amendments to the Objective in order to give effect to the NPSET by providing for an outcome where effects on the National Grid are avoided.	
Transpower New Zealand Limited	S101.080	GRZ - General Residential Zone	GRZ-P9	Oppose	The Policy has the potential to prevent the upgrade and development of the National Grid in the Residential Zone because the Policy includes a requirement to 'avoid'. Transpower considers that expression in this Policy does not give effect to the NPSET or the SRPS	Amend Policy GRZ-P9 as follows: "Avoid activities that are incompatible with the character, qualities and purpose of the General Residential Zone except where the activity is critical infrastructure that has a functional need or operational need for its location "
Transpower New Zealand Limited	S101.081	GRZ - General Residential Zone	GRZ - General	Oppose	The Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct that the General Residential Zone rules apply to infrastructure in addition to the rules in the Infrastructure Chapter. This would result in Rule GRZ-R15 applying and all infrastructure activities being non-complying activities. Transpower seeks that Note 1 is amended to explicitly set out that the General Industrial Zone rules do not apply to infrastructure	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. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do not apply to infrastructure activities. "
Transpower New Zealand Limited	S101.082	GRUZ - General Rural Zone	GRUZ-P11	Support	Transpower supports Policy GRUZ-P11 on the basis that the Policy provides an exception from 'avoidance' for activities that have an operational or function need for locating in the General Rural Zone.	Retain Policy GRUZ-P11 as notified.
Transpower New Zealand Limited	S101.083	GRUZ - General Rural Zone	GRUZ-P13	Support in part	The Policy recognises that the General Rural Zone is often an appropriate location for regionally significant infrastructure. However, Transpower notes that 'critical infrastructure' is a more common (and defined) term in the Proposed District Plan. Transpower considers that 'critical infrastructure' may be the more appropriate term to use in the Policy. Transpower also notes that the Policy 'recognises', but does not go on to say how. Transpower seeks a further amendment to be clear that critical infrastructure is provided for in the General Rural Zone. Such an amendment is important in order to ensure this Policy applies to infrastructure, as opposed to the 'non-rural activities' provisions in Policy GRUZ-P9. In addition, given that the provisions of the Proposed District Plan are to be read as a whole, Transpower considers that reference to various overlays, or protected areas, is not necessary because the specific protections for those areas are set out elsewhere in the Proposed District Plan.	Amend Policy GRUZ-P13 as follows: "GRUZ-P13 Recognise that ~~Regionally Significant critical Infrastructure~~ might be best located in the General Rural Zone by enabling the operation, maintenance and upgrading of critical infrastructure and providing for new critical infrastructure, except where there is an Outstanding Natural Landscape, Outstanding Natural Feature, Significant Natural Area, Natural Hazard risk or Site of Significance to Māori. "
Transpower New Zealand Limited	S101.084	GRUZ - General Rural Zone	GRUZ - General	Oppose	Transpower does not support Note 1 on the basis that the Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct	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. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do

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					that the General Rural Zone rules apply to infrastructure in addition to the rules in the Infrastructure Chapter. This would result in Rule GRUZ-R20 applying and all infrastructure activities being non-complying activities. Transpower seeks that Note 1 is amended to explicitly set out that the General Industrial Zone rules do not apply to infrastructure.	not apply to infrastructure activities."
Transpower New Zealand Limited	S101.085	RLZ - Rural Lifestyle Zone	RLZ-O3	Support in part	Considers that the Objective is not expressed and an outcome and, as such, is not sufficiently clear. Further, it is not clear how this Objective would relate to the National Grid, and give effect to Policy 10 and 11 of the NPSET. Transpower considers that the outcome sought requires refinement in a manner that is consistent with provisions elsewhere in the Proposed District Plan that protect the National Grid and therefore gives effect to the NPSET.	Amend Objective RLZ-O3 as follows: "RLZ-O3 To enable rural lifestyle living opportunities whilst protecting other anticipated activities, including critical infrastructure in adjacent zones from adverse effects, including reverse sensitivity effects arising from, and impacting on, rural lifestyle activities.
Transpower New Zealand Limited	S101.086	RLZ - Rural Lifestyle Zone	RLZ-P6	Support	Transpower supports Policy RLZ-P6 because the National Grid generally has an operational need or functional need for its location and, as such, the Policy provides an exception to the strict requirement to 'avoid' activities.	Retain Policy RLZ-P6 as notified.
Transpower New Zealand Limited	S101.087	RLZ - Rural Lifestyle Zone	RLZ - General	Oppose	Transpower does not support Note 1 on the basis that the Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct that the Rural LifestyleZone rules apply to infrastructure in addition to the rules in the Infrastructure Chapter. This would result in Rule RLZ-R13 applying and all infrastructure activities being non-complying activities. Transpower seeks that Note 1 is amended to explicitly set out that the General Industrial Zone rules do not apply to infrastructure.	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. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do not apply to infrastructure activities."
Transpower New Zealand Limited	S101.088	GIZ - General Industrial Zone	GIZ-P3	Oppose	The Policy has the potential to prevent the upgrade and development of the National Grid in the General Industrial Zone because the Policy includes a requirement to 'avoid' non-industrial activities. Transpower considers that the National Grid is an appropriate activity in the General Industrial Zone that should not be hindered by a policy direction that suggests otherwise. In this regard, Transpower considers that expression in this Policy does not give effect to the NPSET or the SRPS. Transpower seeks that the Policy clearly provides an exemption from the 'avoid' direction for critical infrastructure.	Amend Policy GIZ-P3 as follows: "GIZ-P3 Avoid non-industrial activities from establishing unless: 1. there is a functional or operational need for their location amongst industrial activities; and 2. the activity is of a similar scale and nature to an industrial activity; or 3. the activity is providing for the day-to-day needs of people and activities within the industrial zone; or 4. the activity is ancillary to an industrial activity; or x. the activity is critical infrastructure.
Transpower New Zealand Limited	S101.089	GIZ - General Industrial Zone	GIZ - General	Oppose	The Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct that the General Industrial Zone rules apply to infrastructure in addition to the rules in the	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. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do

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					Infrastructure Chapter. This would result in Rule GIZ-R12 applying and all infrastructure activities being non-complying activities. Transpower seeks that Note 1 is amended to explicitly set out that the General Industrial Zone rules do not apply to infrastructure	not apply to infrastructure activities."
Transpower New Zealand Limited	S101.090	FDZ - Field Days Zone	FDZ-P10	Support in part	The Zone is traversed by the National Grid, and it is therefore important for a matter of national significance, being the needfor the National Grid to continue to be operated and developed in this zone, to not be prevented by the policies for this zone (noting that the enabling of the National Grid is addressed in the Infrastructure SubChapter). While the Field Days and Camp Columba Section 32 Report suggests that the Policy recognises and provides for the National Grid, Transpower considers that the wording of the Policy is not clear. For this reason, Transpower seeks amendments to the Policy to ensure the Policy does not prevent the operation, maintenance, upgrade and development of the National Grid in order to give effect to the NPSET.	Amend Policy FDZ-P10 as follows: "FDZ-P10 Only allow other activities where they are the operation, maintenance, upgrading or development of critical infrastructure or are otherwise compatible with the purpose, character and qualities of the Field Day zone; where adverse effects on the use and amenity values of adjoining sites are avoided, remedied or mitigated, ; and the activity contributes to the overall health and wellbeing of the community. "
Transpower New Zealand Limited	S101.091	FDZ - Field Days Zone	FDZ - General	Oppose	The Note is not sufficiently clear in terms of the rules that might apply to critical infrastructure generally, and the National Grid specifically. That is, as written, the Note could be understood to direct that the Field Days Zone rules apply to infrastructure in addition to the rules in the Infrastructure Chapter. This would result in Rule FDZ-R10 applying and all infrastructure activities being non-complying activities. Transpower seeks that Note 1 is amended to explicitly set out that the Field Day Zone rules do not apply to infrastructure	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. Whilst temporary events are provided for in this Chapter, the remaining Temporary Activities rule apply. Infrastructure activities are provided for in the Infrastructure Chapter and the rules in this chapter do not apply to infrastructure activities." Amend Note 1 to include: "Rule INFR-R7 applies to activities and development near the National Grid."
Transpower New Zealand Limited	S101.092	FDZ - Field Days Zone	FDZ-R2	Oppose	Transpower understands Note 1, Rule INFR-R7 'Activities and development (other than earthworks) within the National Grid Yard' would apply to activities in the Field Day Zone. As such, Transpower is concerned that Rule FDZ-R2 could suggest that a different approach to the management of activities in the vicinity of the National Grid applies in the Field Day Zone. Transpower seeks that the duplicate, and possibly conflicting, condition in Rule FDZ-R2 be deleted and, as a consequence, Note 1 is amended to direct plan users to Rule INFR-R7.	Amend Rule FDZ-R2 as follows: "Activity status: Permitted Where: 1. Any new or extended building or structure complies with standards FDZ-S1, FDZ-S2, FDZ-S3, FDZ-S4, and FDZ-S5; and 2. Compliance with FDZ-S6 is achieved. ~~3. The event must not take place within 12 metres of the base of any High Voltage Network Transmission Tower.~~ Activity status where compliance not achieved with: ~~FDZ-R2(1) and FDZ-R2(2):~~ Restricted Discretionary Matters of discretion: 1. The extent to which the duration, hours, frequency, intensity and scale of the activity may adversely impact on the amenity values of the area. 2. The ongoing effects on the amenity values of surrounding properties and any cumulative effects. 3. The safety and efficiency of the roading network. 4. The matters of discretion for the infringed standard(s). ~~FDZ-R2(3): Restricted Discretionary Matters of discretion: 5. The adverse effects on the safety and efficiency of the High Voltage Network Transmission Tower.~~ Amendments to Note 1 listed in that note submission. As a consequence, Amend Note 1 to include: "Rule INFR-R7 applies to activities and development near the National Grid."
Transpower New Zealand Limited	S101.093	FDZ - Field Days Zone	FDZ-R3	Oppose	As Transpower understands Note 1, Rule INFR-R7 'Activities and development (other than earthworks) within the National Grid Yard' would apply to activities in the Field Day Zone. As such, Transpower is concerned that Rules FDZ-R3 and	Amend Rule FDZ-R3 and Rule FDZ-R4 as follows: FDZ-R3 to FDZ-R4 Activity status: Permitted Where: 1. Any new or extended building or structure complies with standards FDZ-S1, FDZ-S2, FDZ-S3, FDZ-S4, and FDZ-S5. 2. The activity must not take place within 12 metres of the base of any High Voltage Network Transmission Tower. Activity status where compliance not achieved with: ~~FDZ-R4(1)~~ Restricted Discretionary Matters of discretion: 1.

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					FDZ-R4 could suggest that a different approach to the management of activities in the vicinity of the National Grid applies in the Field Day Zone. Transpower seeks that the duplicate, and possibly conflicting, condition in Rule FDZ-R3 and Rule FDZ-R4 be deleted and, as a consequence, Note 1 is amended to direct plan users to Rule INFR-R7.	The matters of discretion for the infringed standard(s). ~~FDZ-R4(2): Restricted Discretionary 2. The adverse effects on the safety and efficiency of the High Voltage Network Transmission Tower.~~ Amendments to Note 1 listed in the note submission
Transpower New Zealand Limited	S101.094	FDZ - Field Days Zone	FDZ-R4	Oppose in part	As Transpower understands Note 1, Rule INFR-R7 'Activities and development (other than earthworks) within the National Grid Yard' would apply to activities in the Field Day Zone. As such, Transpower is concerned that Rules FDZ-R3 and FDZ-R4 could suggest that a different approach to the management of activities in the vicinity of the National Grid applies in the Field Day Zone. Transpower seeks that the duplicate, and possibly conflicting, condition in Rule FDZ-R3 and Rule FDZ-R4 be deleted and, as a consequence, Note 1 is amended to direct plan users to Rule INFR-R7.	Amend Rule FDZ-R3 and Rule FDZ-R4 as follows: FDZ-R3 to FDZ-R4 Activity status: Permitted Where: 1. Any new or extended building or structure complies with standards FDZ-S1, FDZ-S2, FDZ-S3, FDZ-S4, and FDZ-S5. 2. The activity must not take place within 12 metres of the base of any High Voltage Network Transmission Tower. Activity status where compliance not achieved with: ~~FDZ-R4(1) Restricted Discretionary Matters of discretion: 1. The matters of discretion for the infringed standard(s). FDZ-R4(2): Restricted Discretionary 2. The adverse effects on the safety and efficiency of the High Voltage Network Transmission Tower.~~ Amendments to Note 1 listed in the Note submission
Transpower New Zealand Limited	S101.095	FDZ - Field Days Zone	FDZ-R6	Oppose	As Transpower understands Note 1, Rule INFR-R7 'Activities and development (other than earthworks) within the National Grid Yard' would apply to activities in the Field Day Zone. As such, Transpower is concerned that Rules FDZ-R6 could suggest that a different approach to the management of activities in the vicinity of the National Grid applies in the Field Day Zone. Transpower seeks that the duplicate, and possibly conflicting, condition in Rule FDZ-R6 be deleted and, as a consequence, Note 1 is amended to direct plan users to Rule INFR-R7.	Amend Rule FDZ-R6 as follows: "Activity Status: Permitted Where: 1. The activity is undertaken on land, outdoors; and 2. Does not involve more than 12 persons in any one group; and 3. ~~The activity must not take place within 12 metres of the base of any High Voltage Network Transmission Tower, and~~ 4. Any new or extended building or structure complies with zone standards FDZ-S1, FDZ-S2, FDZ-S3, FDZ-S4, and FDZS5." Amendments suggested to Note 1 are listed in that submission
Transpower New Zealand Limited	S101.096	FDZ - Field Days Zone	FDZ-R8	Oppose	As Transpower understands Note 1, Rule INFR-R7 'Activities and development (other than earthworks) within the National Grid Yard' would apply to activities in the Field Day Zone. As such, Transpower is concerned that Rules FDZ-R8 could suggest that a different approach to the management of activities in the vicinity of the National Grid applies in the Field Day Zone. Transpower seeks that the duplicate, and possibly conflicting, condition in Rule FDZ-R8 be deleted and, as a consequence, Note 1 is amended to direct plan users to Rule INFR-R7.	Amend Rule FDZ-R8 as follows: "Activity status: Permitted Where: 1. The visitor accommodation is ancillary to a Temporary Event. 2. The activity complies with the following: ~~(a) the activity must not take place within 12 metres of the base of any High Voltage Network Transmission Tower"~~
Transpower New Zealand Limited	S101.097	DEV - Development Areas	DEV2-ODP	Oppose	While Transpower does not oppose the wider development of the Gore West Residential Development Area, Transpower does not support the Outline Development Plan on the basis that the Plan does not identify the National Grid, National Grid Yard or National Grid Subdivision Corridor, and does not reflect constraints to the development of the area as a consequence of the presence of the National Grid. That is, the area of the Outline Development Plan that is in the vicinity of the National Grid is constrained by provisions in the Proposed District Plan including provisions that	Amend the Outline Development Plan to exclude the area of land that is in the National Grid Yard.

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					regulate development in the National Grid Yard, NZECP34:2001 and section 237 of the PWA that prevents excavations (without permission) within specified distances of transmission line support structures. Against this backdrop, and alongside the policy context (including Policies 10 and 11 of the NPSET), it is considered that the land in the vicinity of the National Grid within the Outline Development Plan Area is not realistically available to accommodate urban or semi urban development. As such, rezoning land in the vicinity of the National Grid to accommodate such development gives rise to misleading expectations and does not give effect to the NPSET and does not represent an efficient, effective or appropriate approach to achieving objectives of the Proposed District Plan and the purpose of the RMA on the basis that: (a) it is reasonably possible to manage activities that may compromise the National Grid through a consideration of zoning; and (b) zoning is a planning tool available to local authorities to signal areas within which sensitive activities will generally not be provided for. Because the National Grid is located parallel to Terry Road and along the western boundary of the development area, it is considered practical and appropriate to adjust the western extent of the Outline Development Plan to exclude the area of land within the National Grid Yard.	
Transpower New Zealand Limited	S101.098	Energy, Infrastructure and Transport map layers	INFR-MAP-National Grid	Support in part	Transpower acknowledges that the Planning Map, as notified, includes the National Grid transmission lines as a solid black line with the notation 'Transpower HV Lines'. Transpower supports the mapping of the National Grid and notes that this is a requirement of Policy 12 of the NPSET that states: "Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated." Transpower also notes that the National Grid is shown as a solid black line as set out in the National Planning Standards. That said, Policy 12 of the NPSET requires all part of the transmission network to be mapped and therefore Transpower suggests that the Planning Map is revised to include all parts of the National Grid (including substations).	Revise the Planning Map as necessary to show all parts of the National Grid (including those parts of the National Grid that are designated)
Transpower New Zealand Limited	S101.099	Development Areas map layers	DEV2-ODP-West Gore	Oppose	While Transpower does not oppose the wider development of the Gore West Residential Development Area, Transpower does not support the Outline Development Plan on the basis that the Plan does not identify the National Grid, National Grid Yard or National Grid Subdivision Corridor, and does not reflect constraints to the development of the area as a consequence of the presence of the National Grid. That is, the area of the Outline	Amend the Planning Map and Outline Development Plan to exclude the area of land that is in the National Grid Yard.

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					Development Plan that is in the vicinity of the National Grid is constrained by provisions in the Proposed District Plan includes provisions that regulate development in the National Grid Yard, NZECP34:2001 and section 237 of the PWA that prevents excavations (without permission) within specified distances of transmission line support structures. Against this backdrop, and alongside the policy context (including Policies 10 and 11 of the NPSET), it is considered that the land in the vicinity of the National Grid within the Outline Development Plan Area is not realistically available to accommodate urban or semi urban development. As such, rezoning land in the vicinity of the National Grid to accommodate such development gives rise to misleading expectations and does not give effect to the NPSET does not represent an efficient, effective or appropriate approach to achieving objectives of the Proposed District Plan and the purpose of the RMA on the basis that: (a) it is reasonably possible to manage activities that may compromise the National Grid through a consideration of zoning; and (b) zoning is a planning tool available to local authorities to signal areas within which sensitive activities will generally not be provided for. Because the National Grid is located parallel to Terry Road and along the western boundary of the development area, it is considered practical and appropriate to adjust the western extent of the Planning Map and Outline Development Plan to exclude the area of land within the National Grid Yard.	
Transpower New Zealand Limited	S101.101	INFR - Infrastructure	INFR-S3	Support	Transpower supports Standard INFR-S3 on the basis that it sets a clear standard for the permitted height of utility poles and masts in various zones. Transpower's support for this Standard, is based on the assumption that all transmission line support structures would be considered utility poles or masts. In addition, Transpower supports the Matters of Discretion	Retain Standard INFR-S3 as notified. Transpower notes that there may be merit in defining poles and masts to include all types of support structures.
Transpower New Zealand Limited	S101.102	CL - Contaminated Land	CL-P3	Support	Transpower supports Policy CL-P3 to the extent that the Policy directs that contaminated land is managed relative to the existing and future use of the site and using a range of measures. Such an approach is appropriate for Transpower's substations that are considered 'contaminated land', but continue to be appropriately used as substations	Retain as notified
Trudy Bokser	S113.001	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	Sites and Areas of Significance to Māori are identified and mapped in the planning maps through a transparent, consistent process. .

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					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.	
Trudy Bokser	S113.002	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.
Trudy Bokser	S113.003	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.
Trudy Bokser	S113.004	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.
Trudy Bokser	S113.005	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.
Trudy Bokser	S113.006	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.~~
Trudy Bokser	S113.007	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 ...
Trudy Bokser	S113.008	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;

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Trudy Bokser	S113.009	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
Trudy Bokser	S113.010	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.
Trudy Bokser	S113.011	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. ...
Trudy Bokser	S113.012	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 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~~
Trudy Bokser	S113.013	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	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:

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					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.	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. 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>

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Trudy Bokser	S113.014	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.
Trudy Bokser	S113.015	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.
Trudy Bokser	S113.016	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
Trudy Bokser	S113.017	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;
Trudy Bokser	S113.018	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.
Trudy Bokser	S113.019	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".
Trudy Bokser	S113.020	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	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 30m 2in area; and

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					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.	(b) Height shall not exceed ~~8~~ 3m; 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%
Trudy Bokser	S113.021	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.
Trudy Bokser	S113.022	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~~ 2mbelow 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.~~
Trudy Bokser	S113.023	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: 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.

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Trudy Bokser	S113.024	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.~~
Trudy Bokser	S113.025	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.
Trudy Bokser	S113.026	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Not Stated	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.
Trudy Bokser	S113.027	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 DiscretionaryMatters 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
Trudy Bokser	S113.028	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
Trudy Bokser	S113.029	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
Trudy Bokser	S113.030	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.
Trudy Bokser	S113.031	SUB - Subdivision	SUB-R4	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R4.

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					when the environmental effects of these activities are negligible.	
Trudy Bokser	S113.032	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.
Trudy Bokser	S113.033	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.
Trudy Bokser	S113.034	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.
Trudy Bokser	S113.035	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.
Trudy Bokser	S113.036	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.
Trudy Bokser	S113.037	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.
Trudy Bokser	S113.038	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.
Trudy Bokser	S113.039	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.
Trudy Bokser	S113.040	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-

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						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.
Trudy Bokser	S113.041	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.
Trudy Bokser	S113.042	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 areafor 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.
Trudy Bokser	S113.043	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 ZoneExcluding 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
Trudy Bokser	S113.044	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
Trudy Bokser	S113.045	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.~~
Trudy Bokser	S113.046	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.
Trudy Bokser	S113.047	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.
Trudy Bokser	S113.048	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.
Trudy Bokser	S113.049	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 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 ...
Trudy Bokser	S113.050	GRUZ - General Rural Zone	GRUZ-O3	Support	Supportive of recognizing the importance of supporting activities for primary production.	Retain GRUZ-O3 as drafted.

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Trudy Bokser	S113.051	GRUZ - General Rural Zone	GRUZ-O4	Support	Supportive of GRUZ-O4.	Retain GRUZ-O4 as drafted.
Trudy Bokser	S113.052	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.
Trudy Bokser	S113.053	GRUZ - General Rural Zone	GRUZ-P1	Support	Supportive of GRUZ-P1.	Retain GRUZ-P1 as drafted.
Trudy Bokser	S113.054	GRUZ - General Rural Zone	GRUZ-P2	Support	Supportive of enabling rural industry in the rural zone.	Retain GRUZ-P2 as drafted.
Trudy Bokser	S113.055	GRUZ - General Rural Zone	GRUZ-P3	Support	Supportive of GRUZ-P3.	Retain GRUZ-P3 as drafted.
Trudy Bokser	S113.056	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.
Trudy Bokser	S113.057	GRUZ - General Rural Zone	GRUZ-P5	Support	Supportive of GRUZ-P5.	Retain GRUZ-P5 as drafted.
Trudy Bokser	S113.058	GRUZ - General Rural Zone	GRUZ-P6	Support	Supportive of GRUZ-P6.	Retain GRUZ-P6 as drafted.
Trudy Bokser	S113.059	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.~~
Trudy Bokser	S113.060	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.
Trudy Bokser	S113.061	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.
Trudy Bokser	S113.062	GRUZ - General Rural Zone	GRUZ-P11	Support	Supportive of GRUZ-P11.	Retain GRUZ-P11.
Trudy Bokser	S113.063	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.
Trudy Bokser	S113.064	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 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

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Trudy Bokser	S113.065	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.
Trudy Bokser	S113.066	GRUZ - General Rural Zone	GRUZ-R5	Support	Supportive of permitted activity status for the establishment of woodlots.	Retain GRUZ-R5 as drafted.
Trudy Bokser	S113.067	GRUZ - General Rural Zone	GRUZ-R6	Support	Supportive of a permitted activity status for conservation activities.	Retain GRUZ-R6 as drafted.
Trudy Bokser	S113.068	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(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.
Trudy Bokser	S113.069	GRUZ - General Rural Zone	GRUZ-R9	Support	Supportive of a permitted activity rule for rural commercial activities.	Retain GRUZ-R9 as drafted.
Trudy Bokser	S113.070	GRUZ - General Rural Zone	GRUZ-R11	Support	Supportive of a permitted activity status for homestay activities.	Retain GRUZ-R11 as drafted.
Trudy Bokser	S113.071	GRUZ - General Rural Zone	GRUZ-R13	Support	Supportive of a permitted activity status for rural commercial recreation activities.	Retain GRUZ-R13 as drafted.

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Trudy Bokser	S113.072	GRUZ - General Rural Zone	GRUZ-R16	Support	Supportive of a permitted activity status for agricultural aviation activities.	Retain GRUZ-R16 as drafted.
Trudy Bokser	S113.073	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.
Trudy Bokser	S113.074	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
Trudy Bokser	S113.075	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
Trudy Bokser	S113.076	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
Trudy Bokser	S113.077	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 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

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						part of the same farming operation.
Trudy Bokser	S113.078	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
Trudy Bokser	S113.079	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.
Trudy Bokser	S113.080	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.~~
Trudy Bokser	S113.081	Interpretation	agricultural aviation activity	Support	Supportive of this definition.	Retain 'agricultural aviation activity' definition as drafted.
Trudy Bokser	S113.082	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.
Trudy Bokser	S113.083	Interpretation	conservation activity	Support	Supportive of this definition.	Retain 'conservation activities' definition as drafted.
Trudy Bokser	S113.084	Interpretation	cultivation	Support	Supports the alignment of definitions with the National Planning Standards.	Retain 'cultivation' definition as drafted.
Trudy Bokser	S113.085	Interpretation	dead holes	Support	Supports this definition.	Retain 'dead holes' definition as drafted.
Trudy Bokser	S113.086	Interpretation	earthworks	Support	Supports this definition.	Retain 'earthworks' definition as drafted.

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Trudy Bokser	S113.087	Interpretation	farm quarry	Support	Supportive of this definition.	Retain 'farm quarry' definition as notified.
Trudy Bokser	S113.088	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.
Trudy Bokser	S113.089	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.
Trudy Bokser	S113.090	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
Trudy Bokser	S113.091	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)
Trudy Bokser	S113.092	Interpretation	improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'improved pasture' definition as drafted.
Trudy Bokser	S113.093	Interpretation	indigenous vegetation	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'indigenous vegetation' definition as drafted.
Trudy Bokser	S113.094	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
Trudy Bokser	S113.095	Interpretation	land disturbance	Support	Supportive of the definitions with National Planning Standards.	Retain 'land disturbance' definition as drafted.
Trudy Bokser	S113.096	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.
Trudy Bokser	S113.097	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, 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~~

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						~~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. —~~
Trudy Bokser	S113.098	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.
Trudy Bokser	S113.099	Interpretation	primary production	Support	Supportive of the alignment with national planning standards.	Retain 'primary production' definition as drafted.
Trudy Bokser	S113.100	Interpretation	rural airstrip	Support	Supportive of this definition.	Retain 'rural airstrip' definition as notified.
Trudy Bokser	S113.101	Interpretation	rural commercial recreation activity	Support	Supportive of this definition.	Retain 'rural commercial recreation activity' definition as drafted.
Trudy Bokser	S113.102	Interpretation	rural environment	Support	Supportive of this definition.	Retain 'rural environment' definition as drafted.
Trudy Bokser	S113.103	Interpretation	rural industry	Support	Supportive of the alignment with national planning standards.	Retain 'rural industry' definition as drafted.
Trudy Bokser	S113.104	Interpretation	rural produce retail activity	Support	Supportive of this definition.	Retain 'rural produce retail activity' as drafted.
Trudy Bokser	S113.105	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.~~
Trudy Bokser	S113.106	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~~
Trudy Bokser	S113.107	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.

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Trudy Bokser	S113.108	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).
Trudy Bokser	S113.109	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.
Trudy Bokser	S113.110	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.
Trudy Bokser	S113.111	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.
Trudy Bokser	S113.112	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.
Trudy Bokser	S113.113	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.	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

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					Alignment with the definition as per the Proposed Southland Land and Water plan is suggested.	completely encapsulated in plastic.
Trudy Bokser	S113.114	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
Trudy Bokser	S113.115	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
Trudy Bokser	S113.116	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
Trudy Bokser	S113.117	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 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	Amend as per submission.

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					are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	
Waikaka Gold Mines Limited	S129.001	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Amend	The term rural production activities is not defined in the PDP and the meaning would be more appropriately conveyed by the term primary production activities, which is defined in the PDP.	Replace "rural production activities" with "primary production activities" so the first sentence reads: The purpose of the General Rural Zone is to provide for and protect primary production activities and other activities that rely on the rural resource.
Waikaka Gold Mines Limited	S129.002	GRUZ - General Rural Zone	GRUZ-O2	Amend	The notified wording implies high levels of rural amenity in all locations. This is inconsistent with text in the zone overview which recognises the working character of the rural environment where rural activities generate noise, odour and traffic. The Submitter considers the description in the zone overview appropriately acknowledges the spectrum of activities which occur in the rural zone and is consistent with GRUZ-O1 which recognises the importance of primary production and rural industry. As it is currently worded, the Objective GRUZ-O2(4) creates an	Amend GRUZ-O2 (4) to recognise that areas of high rural amenity are associated with outstanding natural landscapes and significant natural areas: 4. high levels of rural amenity associated with outstanding natural landscapes and significant natural areas.
Waikaka Gold Mines Limited	S129.003	GRUZ - General Rural Zone	GRUZ-P5	Amend	The proposed amendment addresses a policy gap in respect of non-small-scale quarries and mines and appropriately provides for these with suitable effects management. It is consistent with GRUZ-O1 which recognises the importance of primary production to the district. GRUZ-P6 does address the effects management of quarries and mines more generally, the recognition of the benefits of quarrying and mining activities on the local economy is specified in GRUZ-P5. The policy framework reads (as notified) that recognition of benefits only applies to small scale operations, however, larger scale operations would logically have larger scale benefits, and these should also be recognised.	Edit GRUZ-P5 to address non-small scale quarries and mines by adding text to the end of the policy as below: Recognise the benefits of quarrying and mining activities on the local economy and supporting associated industries through enabling small scale quarries and mines and providing for larger quarries and mines with appropriate effects management as set out in GRUZ-P6
Waikaka Gold Mines Limited	S129.004	GRUZ - General Rural Zone	GRUZ-P6	Amend	Replacement of "avoid" with "restrict" allows for an activity to be restricted through controls on conditions of consent, location, scale or methodology that may suitably manage the effects of the activity. The term "remedied" is added into the policy as it may potentially provide an appropriate method for managing effects of an activity.	Edit GRUZ-P6 as below: Manage the environmental and cultural effects of quarrying and mining and ~~avoid~~ restrict quarrying and mining activities that result in adverse cultural or environmental effects that cannot be avoided, remedied ,mitigated or offset
Waikaka Gold Mines Limited	S129.005	GRUZ - General Rural Zone	GRUZ-P10	Amend	The addition of clause 4 recognises that temporary activities may be undertaken on highly productive land where there is no irreversible loss of productive capacity. This is consistent with the National Policy Statement for Highly Productive Land section 3.9(2)(g).	Add a clause to the end of GRUZ-P10 to provide for temporary activities: 4. requiring remediation of highly productive land where activities result in temporary loss or reduction to theproductive capacity of the land.
Waikaka Gold Mines Limited	S129.006	GRUZ - General Rural Zone	GRUZ-R2	Amend	Addition of a land parcel size limit to clause 2 of the rule enables recognition that small land parcels do not contribute to productive capacity to the same	Edit clause 2 of GRUZ-R2 as follows: 2. The activity is not located on a land parcel greater than 20 hectares that is Highly Productive Land; and

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					degree as larger land parcels. This is consistent National Policy Statement for Highly Productive Land Section 3.9(g). Addition of a setback from waterbodies reflects appropriate consideration of amenity and public access matters in relation to waterbodies. The term waterbody is defined in the PDP, but specifically includes aquifers. The regional planning requirements more appropriately manage effects on aquifers and hence these are excluded from the additional clause (d). The Restricted Discretionary activity status is consistent with the activity status for quarrying and rural industry in GRUZ-R3 and GRUZ-R4 and enables consideration of relevant effects.	Add a new sub-clause (d) to GRUZ-R2(3): (d) 10m from any waterbody, except an aquifer; Amend the activity status of GRUZ-R2 to Restricted Discretionary and add in the following matters of discretion. Matters of discretion: 1. Location and scale of the activity. 2. The timing and duration of the activity. 3. Sediment and erosion effects and management. 4. Effects on ground stability. 5. The effects on rural character and amenity values of the surrounding environment. 6. Any potential reverse sensitivity effects and/or conflict with existing activities, and the ability to mitigate these effects. 7. Services. 8. Safety and suitability of access and effects on the transport network from additional traffic generation. 9. Protection of Highly Productive Land. 10. Impacts on Ngāi Tahu cultural values, including those listed in MW-2.3. 11. The matters of discretion of any infringed standard
Waka Kotahi NZ Transport Agency	S112.001	How the Plan works	Relationship between spatial layers	Support	Waka Kotahi supports the inclusion of the street categories from the One Network Framework (ONF). These categories recognise the shared, integrated planning approaches between land use and transport and is therefore appropriate to be used with the Plan. Waka Kotahi therefore supports the use of the terminology and definitions from the ONF.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.002	Interpretation	Definitions	Support	Waka Kotahi supports all the definitions within Part 1 Interpretation, Definitions except as noted in submission	Retain definitions as notified except for those commented on
Waka Kotahi NZ Transport Agency	S112.003	Interpretation	critical infrastructure	Support in part	Generally supports the definition for critical infrastructure. However, notes that this definition includes the terms 'strategic land transport network' and 'arterial roads' and that neither of those terms are specifically defined in the Plan. While the Plan does include definition(s) for 'transport network' and 'roads' that incorporate the State highway network the limitations placed within the definition of 'critical infrastructure' require these to be strategic land transport networks or arterial roads. Waka Kotahi further notes the planning maps use the street categories from the ONF and do not identify the arterial roads within the District. Waka Kotahi is therefore concerned that the definition of critical infrastructure is unclear and recommend that this it be amended to specifically refer to the State highway network to ensure it is appropriately captured within the definition.	Amend as follows: Means those necessary facilities, services, and installations which are critical or of significance to either New Zealand, Southland or Gore. This may include but is not limited to: Strategic land transport network including the State highway network and arterial roads;
Waka Kotahi NZ Transport Agency	S112.004	Interpretation	land transport infrastructure	Support in part	Generally supports the land transport infrastructure definition, however seeks the following amendments: (d) insert culverts, erosion protection structures and defences against water within the definition as they are provided and maintained by Waka Kotahi as part of the State highway network. (e) amend to only include official signs. Official	Amend the definition as follows: Means any infrastructure, building, equipment or devices that support the movement of people and goods by land including: (d) Roads, including carriageways, pavements, bridges, culverts, erosion protection structures, defences against water, tunnels, retaining walls, underpasses, overpasses, verges and berms; (e) Lighting, signals, official signs and control structures and devices associated with intelligent transport systems including vehicle detection systems (electronic vehicle identification and infra-red vehicle occupancy counters), incident detection, emergency

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					signs are defined by the Plan as the same meaning as per the National Planning Standards. Waka Kotahi do not wish to capture all signs such as advertising signs as part of this definition. (f) amend to include raised safety platforms, turnaround bays, intersection speed zones and skid resistance which are also provided and maintained as part of State highway network.	telephones, cables and ducting; ... (f) safety devices including handrails, bollards, road markings, rumble strips, barriers, fences, speed tables, speed cushions, ~~and~~ traffic separators, raised safety platforms, turnaround bays, intersection speed zones, and skid resistance.
Waka Kotahi NZ Transport Agency	S112.005	Interpretation	movement lane	Support in part	Supports the definition but recommends that the reference to 'play' be removed from this definition. In a wider context streets and roads have both 'movement' and 'place' roles. However, the movement lanes are not the space within streets and roads for activities such as 'play' from a traffic safety and efficiency perspective.	Amend the definition as follows: Means that part of the formed and sealed road that serves the link function in a road. It may have a shared use for other activities such as walking, cycling, parking ~~and play.~~
Waka Kotahi NZ Transport Agency	S112.006	Interpretation	noise sensitive activity	Support in part	Suggests that residential activity is amended to explicitly include student and retirement accommodation to provide certainty for plan users. We also recommend that specific rooms within a building, that are used solely for the purposes of an entrance, passageway, toilet, bathroom, laundry, garage or storeroom, are noted as being excluded from the definition and therefore exempt from the mitigative measures required by other plan provisions for buildings used for noise sensitive activities.	Amend as follows, or use words of similar intent: Noise sensitive activity means any: (a) health care centre or hospital where overnight accommodation is provided. (b) educational facility, excluding trade and industrial training facility. (c) residential activity., including student or retirement accommodation. (d) visitor accommodation. (e) places of worship. (f) marae or Papatipu Rūnanga complex. (g) Graveyard or urupā. Excludes those rooms used solely for the purposes of an entrance, passageway, toilet, bathroom, laundry, garage or storeroom.
Waka Kotahi NZ Transport Agency	S112.007	Interpretation	reverse sensitivity	Support in part	Waka Kotahi generally supports this definition as it describes the fundamentals of reverse sensitivity. However, for clarity we recommend that it includes reference to whether the activity is approved by a resource consent, designation or certificate of compliance.	Amend the definition as follows: The potential for an approved (whether by resource consent, ~~or~~ designation or certificate of compliance), 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.
Waka Kotahi NZ Transport Agency	S112.008	Interpretation	street furniture	Support in part	However, we recommend that the definition be amended to ensure that is consistent with the street furniture included in the ONF by inserting bollards, benches, drinking fountains, rubbish and recycling bins and cycle parking stands.	Amend the definition as follows: Means equipment within the footpath such as signal poles, lighting columns, signs, parking meters, seats, benches, bollards, drinking fountains, rubbish and recycling bins, cycle parking and landscaping ~~etc.~~
Waka Kotahi NZ Transport Agency	S112.009	Interpretation	transport network	Support in part	Waka Kotahi supports this definition as stated. For clarification purposes, we recommend that it include cyclists.	Amend the definition as follows: Means any transport route that support the movement of people and goods and includes trains, motorised vehicles, non-motorised modes of transport ~~and~~ pedestrians and cyclists.
Waka Kotahi NZ Transport Agency	S112.010	UFD - Urban form and development	UFD-O1	Support in part	Supports the intent of the objective but notes that UFD-O1 point 6 seeks to ensure that development utilises existing infrastructure and / or can be efficiently serviced with new infrastructure. While Waka Kotahi has a wider legislative responsibility under the Land Transport Management Act 2003 to contribute to the safe, efficient and effective use and provision of State highway infrastructure and recommends that the objective is amended to reflect this. Recommends greater recognition be given in to the use and provision of critical infrastructure that	Amend the wording as follows or words to this affect: UFD-01 (...) 6. manages the safe, effective and efficient use and provision of ~~utilises new and~~ existing infrastructure ~~and/or can be efficiently serviced with new infrastructure.~~ 10. provides a resilient critical infrastructure network to meet the needs of the Gore District. 11. provides opportunities for active transport modes (walkways and cycleways).

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					accompanies growth and development. In recent years, Gore has been subject to significant flooding events resulting in the closure and damage to State highway infrastructure. Notes that the resilience of critical infrastructure is an important consideration when accommodating growth and development in low lying and flood prone areas and this should be reflected in the objective. The provision of opportunities for active transport modes (walking and cycling) is an important consideration when planning for future growth and development, and supports a mode shift away from vehicles. The compact and cohesive urban framework sought for the towns and settlements within the Gore District combined with its topography do provide opportunities as part of growth and development plans for provide for active transport modes, and greater recognition for these are sought and would further support the inclusion of the ONF descriptions included with the Plan.	
Waka Kotahi NZ Transport Agency	S112.011	UFD - Urban form and development	UFD-O7	Support in part	Waka Kotahi recommends that UFD - 07, point 3, be amended to insert the word 'safe' to ensure that this important function of transport network is appropriately addressed within this objective. Waka Kotahi further seeks to amend the objective to insert an additional point that incorporates active transport where appropriate. This is consistent with the inclusion of the ONF descriptions.	Amend the wording of Objective UFD-O7 as follows: Urban environments are liveable, connected, accessible, safe and well-designed spaces for the community to live, work and play in, which: 3. have safe , connected and efficient transport networks; 5. incorporate active transport where appropriate .
Waka Kotahi NZ Transport Agency	S112.012	UFD - Urban form and development	UFD-O9	Support in part	Waka Kotahi is aware that it is proposed through this District Plan to rezone an area of land to the south of the Gore township on the western side of SH 1 to be the Gore South Industrial Development Area (DEV1). As part of any growth and development for industrial purposes, consideration should be given to what upgrading works would be required to key transport routes to support the safe, efficient and efficient transportation people and goods. Waka Kotahi seeks that UFD - 09 be amended to ensure that these considerations are made.	Amend the wording of Objective UFD - 09 as follows: there is sufficient land for industrial activities in the short, medium, and long-term in appropriate locations, including: 1. along key transport routes to ensure the safe, efficient and effective transportation of products and minimisation of heavy vehicles and high traffic volumes on local roads. 3. upgrade works are undertaken to key transportation routes to support the safe, efficient and effective transportation of people and goods .
Waka Kotahi NZ Transport Agency	S112.013	INFR - Infrastructure	INFR-O2	Support in part	Waka Kotahi recommends an amendment to include the words 'safe, effective and efficient way ' to make the intent of the objective more explicit and maintain consistency with the terminology used within the Land Transport Management Act 2003.	Amend INFR - O2 as follows: Infrastructure within new subdivisions and developments integrates with existing infrastructure in a safe, effective and efficient way and provides for opportunities to link with future infrastructure in accordance with the Gore District Subdivision and Land Development Bylaw 2019 or any subsequent replacement document.
Waka Kotahi NZ Transport Agency	S112.014	INFR - Infrastructure	INFR-P1	Support	Waka Kotahi generally supports policy INFR - P1 in that it seeks to enable the provision and ongoing maintenance, upgrading and use of infrastructure.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.015	INFR - Infrastructure	INFR-P6	Support in part	We recommend that the policy be reworded to improve its clarity and interpretation so that it	Amend INFR - P6 with the following wording: Adverse effects (including reverse sensitivity effects) are avoided, remedied or mitigated where activities are adjacent to critical

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					applies to the subdivision, use and development of land that creates reverse sensitive effects on the State highway network as well as the National Grid.	infrastructure, including the management of sensitive activities and the effects of subdivision, use and development that may compromise the operation, maintenance, upgrade and development of the National Grid and the State highway network . Or replace it with the following: Manage adverse effects including reverse sensitivity effects from subdivision, use and development on critical infrastructure and network utilities to ensure that they do not compromise their operation, maintenance, upgrade and development.
Waka Kotahi NZ Transport Agency	S112.016	INFR - Infrastructure	INFR-R3	Support in part	Waka Kotahi notes that this rule relates to the operation, maintenance, replacement, upgrade, repair or removal of existing above ground infrastructure and access tracks as a permitted activity in all zones. If the above works are required within the State highway corridor then the Government Roding Powers Act 1989 (GRP) applies. This Act requires Waka Kotahi to permit utility authorities and Territorial Local Authorities (TLAs) to install services in State highway corridors subject to an application and necessary conditions. In this regard, we consider that the rule should be retained with the following amendments to the Matters of Discretion to include safety considerations and apply the provision to footpaths and cycleways.	Amend Matters for Discretion as follow: 4. Impact on the safety and function of the road, including any footpath or cycleway .
Waka Kotahi NZ Transport Agency	S112.017	INFR - Infrastructure	INFR-S4	Support in part	Waka Kotahi notes that the Matters of discretion include the wording 'structure' which appears to be incorrect and should be amended to include the wording 'building' to align with the terminology used in the standard. Amendments are also sought to Point 4 of the Matters of discretion to include safety considerations and apply to both footpaths and cycleways.	Amend Matters of Discretion as follows: 1. Alternative locations for the building structure . 2. The functional needs and operational needs of, and benefits derived from, the building structure , including the potential impact on the levels of service if a building structure of the proposed size is not approved. ... 4. Impacts on the safety and functionality of the road, including any footpath or cycleway .
Waka Kotahi NZ Transport Agency	S112.018	INFR - Infrastructure	INFR-S6	Support in part	Waka Kotahi supports INFR - S6 maximum footprint limitations of any utility building or structure as permitted activity in the respective zones. While the road boundary setbacks are to be adhered to as stated in Rule INFR - S4 there may be some circumstances where large utilities near the road corridor obstruct views of intersections, accessways and oncoming traffic or create shading over roads. We recommend that an additional Matters of discretion be included to address safety considerations of the roads.	Amend the Matters of discretion as follows: 5. Impact on safe, efficient and effective function or operation of roads including State highways including any obstruction of views of intersections, accessways or ongoing traffic and any shading over roads.
Waka Kotahi NZ Transport Agency	S112.019	TRANS - Transport	TRANS-O1	Support	Waka Kotahi supports the inclusion of these objectives.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.020	TRANS - Transport	TRANS-O2	Support	Waka Kotahi supports the inclusion of these objectives.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.021	TRANS - Transport	TRANS-O3	Support	Waka Kotahi supports the inclusion of these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.022	TRANS - Transport	TRANS-O3	Support	Waka Kotahi supports the inclusion of these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.023	TRANS - Transport	TRANS-O4	Support	Waka Kotahi supports the inclusion of these objectives.	Retain as notified

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Waka Kotahi NZ Transport Agency	S112.024	TRANS - Transport	TRANS-O5	Support	Waka Kotahi supports the inclusion of these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.025	TRANS - Transport	TRANS-O6	Support	Waka Kotahi supports the inclusion of these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.026	TRANS - Transport	TRANS-Additional provisions sought	Not Stated	The objectives in the TRANS chapter of the Plan do not specifically address the importance of the continued function and resilience of transport network from the effects of climate change and natural hazards. Given the ongoing challenges that high rainfall and flooding events present to the Gore District, we recommend that a new objective be inserted to reflect the need to provide a resilient transport network that recognises the effects on climate change and natural hazards and the need to adapt to the changes associated with those effects.	Insert a new objective as follows: A resilient transport network is provided that recognises the adverse effects of climate change and natural hazards and the need to adapt to the changes associated with those effects.
Waka Kotahi NZ Transport Agency	S112.027	TRANS - Transport	TRANS-P1	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.028	TRANS - Transport	TRANS-P2	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.029	TRANS - Transport	TRANS-P4	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.030	TRANS - Transport	TRANS-P6	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.031	TRANS - Transport	TRANS-P7	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.032	TRANS - Transport	TRANS-P8	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.033	TRANS - Transport	TRANS-P9	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.034	TRANS - Transport	TRANS-P11	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.035	TRANS - Transport	TRANS-P12	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.036	TRANS - Transport	TRANS-P3	Support in part	Supports enabling of land transport infrastructure for all modes of transport and it aligns with the strategic priorities of the Government Policy Statement on Land Transport 2021/22 - 2030/31. However, recommends that wording of the policy include a reference to cyclists.	Amend TRANS - P3 as follows: Enable the establishment and maintenance of land transport infrastructure that connects current and future land uses with transport routes that support the movement of people and goods and includes trains, motorised vehicles, non-motorised modes of transport, and pedestrians and cyclists .
Waka Kotahi NZ Transport Agency	S112.037	TRANS - Transport	TRANS-P10	Support in part	The wording "compatible" in the policy is open to interpretation and to improve the clarity of this policy we recommend that the wording " is consistent with the function and purpose of the street category".	Amend TRANS - P10 as follows: Manage high trip generating activities and the effects of vehicle movements on the transport network to ensure that: ... 3. the activity ~~compatible with the character~~ is consistent with the function and purpose of the street category and amenity of the surrounding area
Waka Kotahi NZ Transport Agency	S112.038	TRANS - Transport	TRANS-P13	Support in part	Waka Kotahi recommends an amendment to include the word 'safely' to make the intent of the objective more explicit that safety is an important consideration in preparing and implementing parking strategies.	Amend TRANS - P13 as follows: Prepare and implement a parking strategy for the Gore Town Centre Zone and Mataura Local Centre Zone that recognises and provides for the volume and nature of parking and deliveries required for activities to be safely and efficiently carried out in those areas.
Waka Kotahi NZ Transport Agency	S112.039	TRANS - Transport	TRANS - General	Support	Waka Kotahi supports the inclusion of Note 3 for clearly identifying the road controlling authority is Waka Kotahi New Zealand Transport Agency for all State highways.	Retain as notified

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Waka Kotahi NZ Transport Agency	S112.040	TRANS - Transport	TRANS-R2	Oppose in part	Waka Kotahi understands that the overall intention of the rule is to permit vehicle access to a formed road as a permitted activity in all zones. However, Waka Kotahi approval is required for any new access or increase in use of an existing access onto a State highway. The proposed rule in its current form only requires an access onto some roads as a Restricted Discretionary Activity, and Waka Kotahi recommends that the rule be amended to ensure that any new access or an increase in use of any existing access that connects to a State highway is classified as a Restricted Discretionary Activity and that a matter of discretion is added to include the outcome of consultation with Waka Kothai. Queries whether the word "and" should be replaced with "an" within this rule. Any new access or any intensification of vehicle use for an existing access onto a State Highway will require an assessment. Recommends that an advisory note be inserted into the rule that advice be sought from Waka Kotahi where the vehicle access connects to a State highway.	Amend Rule TRANS - R2 as follows: Activity status: Permitted Any new access or an increase in use of and an existing access is permitted where: 1. The access is not: (a) ~~connecting to any State Highway to an interregional Connector, Rural Connector where it is a State Highway~~, Urban Connector, Main or activity street; or (b) connecting to a heavy vehicle bypass route; or (c) within 30m of an at-grade railway crossing Advisory Note: Advice should be sought from Waka Kotahi New Zealand Transport Agency where the vehicle access connects to a State Highway. Amend Rule TRANS - R2 Matters of Discretion as follows: Matters of discretion: ... 5. The outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the vehicle access connects to a State Highway.
Waka Kotahi NZ Transport Agency	S112.041	TRANS - Transport	TRANS-R4	Oppose in part	High trip generating activities can have an impact on the wider land transport network and therefore we seek to amend this provision, at least as it applies to the State highway network, to adopt the 100 Equivalent Car Movements (ecm) approach as per Appendix 5B of the Waka Kotahi 'Planning and Policy Manual 2007 and subsequent relevant amendments and to more accurately assess the effects associated with heavy vehicle movements onto State highways. Waka Kotahi considers that the 250 vehicle movements / per day (vm/pd) threshold is set too high and could result in unforeseen and unplanned demands being placed on land transport infrastructure including the State highway network.	Amend TRANS - R4 as follows, or using words of similar intent: High Trip generation at existing and proposed property accesses. All Zones (except Field Days, Sports and Active Recreation Zones and Camp Columba Zone): 1. Any new activities or an increase of existing activities, individually or collectively on a site, that are not directly accessed from a state highway, generate more than 250 vehicle movements per day. 2. Any new activities or an increase of existing activities, individually or collectively on a site accessed directly from the state highway, generate more than 100 Equivalent Car Movements Per Day in accordance with the Table found on page 18/19 of original submission.
Waka Kotahi NZ Transport Agency	S112.042	TRANS - Transport	TRANS-R4	Oppose in part	In light of the relief sought in the submissions above, Waka Kotahi seeks to include a new Matter of discretion into TRANS - R4 to include the outcome of consultation with Waka Kotahi where the access that connects to a State Highway.	Amend TRANS -R4 Matters of discretion as follows: 5. The outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the access connects to any State Highway,
Waka Kotahi NZ Transport Agency	S112.043	TRANS - Transport	TRANS - General	Not Stated	Waka Kotahi notes that some of the TRANS standards do not entirely align with the requirements set out in the New Zealand Transport Agency's 'Planning and Policy Manual' (PPM, 2007) and current internal practise. Waka Kotahi is concerned that third parties will have an expectation that they can design their works, such as vehicle crossings onto the state highway, to meet the district plan standard and that that standard will also be acceptable to Waka Kotahi. This is not an issue where our standards align but	Assess whether amendments should be made to rule TRANS-R1 and TRANS-R2 to provide clarity on the application of TABLE-S5, TABLE-S6, TRANS -S8, TRANS - s9 Figure 1, TRANS - S10 2. (b), TABLE - S10 and TRANS - S11(4), and associated drawings R091, R09-2 and R09-3.

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					could create difficulties where there is misalignment and seeking amendments to address this, so that its clear to Plan users what design standards would need to be met for works associated with the State highway network.	
Waka Kotahi NZ Transport Agency	S112.044	TRANS - Transport	TRANS-S5	Support in part	The last column under the 'Rural' column of this Table, that refers to 'Milk tanker', has brackets that state (if this is a State highway). Waka Kotahi suggest this statement is unclear and potentially should be changed to (if this is not a State highway).	Amend the Table as follows, or using words of similar intent: ... ~~(if this is a State highway)~~ (if this is not a State highway)
Waka Kotahi NZ Transport Agency	S112.045	TRANS - Transport	TRANS-S5	Oppose in part	The table uses the term 'Milk tanker' for rural crossing places and appears to be a reference to the Waka Kotahi Planning and Policy Manual's now outdated Diagram D standard. The Diagram D standard which has been used for milk tankers and other large vehicle crossings in the past has been discontinued for safety reasons. Hence for large vehicle crossings we would now recommend a Diagram E standard (attached as Appendix 1). If Council want to use the Diagram D standard for milk tankers on local roads, the table should remain unchanged, except that we suggest State highways should be excluded.	For clarity either add wording to the column of TABLE-S5 titled 'Milk tanker' to indicate that it applies to all roads except State highways and/or include a note that for State highways the Diagram E standard applies instead, and/or change Standard Construction Drawing R09-3 to reflect a Diagram E standard.
Waka Kotahi NZ Transport Agency	S112.046	TRANS - Transport	TRANS-S5	Support in part	Within the rural section of the table the width (m) at the property boundary is stated as 4.5 m for both private and high use commercial. The Waka Kotahi standard is 6m for these accesses and we suggest the table is changed to reflect the Waka Kotahi Planning and Policy Manual (PPM) standard for State highway accesses or alternatively that State highways are excluded from this standard.	For clarity, within the 'Rural' column of the Table, either change the 'private' and 'high use or commercial' width of crossing place from 4.5m to 6m for accesses onto State highways, or alternatively amend the table to exclude State highways from this standard.
Waka Kotahi NZ Transport Agency	S112.047	TRANS - Transport	TRANS-S6	Support in part	TABLE-S6 does not reflect the Waka Kotahi sight distances as detailed in Table App5B/1 of the Waka Kotahi Planning and Policy Manual (PPM) (attached as Appendix 2). TABLE-S6 however is inclusive of regional collector roads which would include State highways. We recommend that TABLE-S6 is amended to either align with the PPM in so far as State highways are concerned, or alternatively that State highway are excluded from TABLE-S6.	For clarity either amend TABLE-S6 so that the sight distances for State highways aligns with Table App5B/1 of the PPM, or alternatively amend so that State highway are excluded from TABLE-S6.
Waka Kotahi NZ Transport Agency	S112.048	TRANS - Transport	TRANS-S8	Support in part	This rule seeks to manage the effects from visual obstructions within the sightline areas of railway level crossings. However, the standard also potentially captures signs and other devices that would make the crossing safer.	Amend the text to add a note or an exclusion explaining signs and rail/road devices that are intended to make the level crossing places safer are excluded from this standard.
Waka Kotahi NZ Transport Agency	S112.049	TRANS - Transport	TRANS-S9	Support in part	Waka Kotahi consider that the turning radii for 'commercial' and 'industrial' seem tight for large trucks. Would a 15 metre radius accommodate a quad semi truck doing a 180 degrees turn?	Consider reassessing the turning radii to identify if large trucks will be able to be accommodated within the radii suggested for commercial and industrial, and make any necessary amendments
Waka Kotahi NZ Transport Agency	S112.050	TRANS - Transport	TRANS-S10	Support in part	Clause- S10(2)(b) applies to all rural road intersections, which could capture intersections with State highways. Waka Kotahi consider that the clause is unclear. We assume that the standard,	Provide clarification on the passing provision required by this standard, in particular as it applies to clause 2(b). Reconsider and amend the standard as necessary to provide an increase in size of the passing lane dimensions, or exclude intersections with State highways from this standard such that the road design would default back to road

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					in seeking provision for passing, it means that room should be provided for two lanes - can you please clarify this? The minimum dimensions of 2.1 by 6m including entry and departure tapers seems too small of a scale given large rural trucks may also need to use these areas. Waka Kotahi suggests that the standard either needs to be reassessed and amended to provide an increase in the passing area dimensions, or that state highway intersections with rural roads are excluded from the Standard.	controlling authority, in this instance Waka Kotahi.
Waka Kotahi NZ Transport Agency	S112.051	TRANS - Transport	TRANS-S10	Support in part	Table S10 is missing design elements for cyclists and shared paths for state highways and the different requirements for rural and urban environments. For State highways, in an urban environment paths for cyclists are accommodated in the parking lane and in the rural environment they are accommodated in the shoulder. Table S10 does not provide the State highway requirements for cyclists.	For clarity either exclude State highways from Table- S10 or accommodate the State highway standards within the table.
Waka Kotahi NZ Transport Agency	S112.052	TRANS - Transport	TRANS-S11	Support in part	The text immediately below TRANS-S11 4 notes that for visibility splays, objects and vegetation shall not exceed 1.2m visibility splays. This would capture traffic control devices like signs. It also allows vegetation up to 1.2m in height. Waka Kotahi suggest the standard be changed to exclude traffic control devices and for the maximum height of vegetation to be reduced to either 0.3m or 0.5 m to ensure that the vegetation doesn't obstruct the view of a driver seated in a vehicle.	Amend as follows or words of similar intent: Within these areas any structures, objects and vegetation excluding traffic control devices shall not exceed 0.5 m in height, other than fences of open wire construction
Waka Kotahi NZ Transport Agency	S112.053	NH - Natural Hazards	NH-O1	Support	Waka Kotahi supports these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.054	NH - Natural Hazards	NH-O2	Support	Waka Kotahi supports these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.055	NH - Natural Hazards	NH-O5	Support	Waka Kotahi supports these objectives	Retain as notified
Waka Kotahi NZ Transport Agency	S112.056	NH - Natural Hazards	NH-O3	Support in part	We recommend that the objective include that the natural hazard risk on land transport infrastructure is not exacerbated.	Amend NH-O3 as follows: Ensure new subdivision and development activities are only located in areas where the natural hazard risk is: 2. not exacerbated on other sites and on land transport infrastructure.
Waka Kotahi NZ Transport Agency	S112.057	NH - Natural Hazards	NH-O4	Support in part	Waka Kotahi generally supports this objective but note that the wording 'regional significant infrastructure' is not defined in the Plan. Waka Kotahi request that consideration be given to either defining or explaining 'regional significant infrastructure' in the context of this objective or using the term 'critical infrastructure' which is defined in the Plan to provide greater clarity and certainty within this objective that it applies to the transport network.	Amend NH - O4 to either explain or define the term 'regional significant infrastructure' or amend the wording to 'critical infrastructure'
Waka Kotahi NZ Transport Agency	S112.058	NH - Natural Hazards	NH-P1	Support	Waka Kotahi supports the risk-based approach as stated in this policy in the management of subdivision, use and development from natural hazards. Waka Kotahi supports the ongoing	Retain as notified

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					identification and management of natural hazard risks to determine the type, level and severity, sensitivity of activities and ability to recover after a natural hazard event.	
Waka Kotahi NZ Transport Agency	S112.059	NH - Natural Hazards	NH-P2	Support in part	Waka Kotahi generally supports this policy but is aware that the use, development and subdivision of land can exacerbate surface water flooding particularly on identified flood prone land if the activity is inappropriately located, planned or designed. Waka Kotahi notes that the Actual or Potential Inundation Areas as shown in the planning maps are often located near or directly adjacent to the State highway network. Waka Kotahi therefore seeks an amendment to this policy to ensure that the activity does not result in adverse effects on the safe and efficient operation and function of critical infrastructure to capture this issue within this policy.	Amend NH-P2 as follows: Manage the use, development and subdivision of land in all mapped Actual or Potential Inundation Areas, with the exception of the Stopbank Protection Areas by: 8. ensuring that the activity does not result in adverse effects on the safe and efficient operation and function of critical infrastructure.
Waka Kotahi NZ Transport Agency	S112.060	NH - Natural Hazards	NH-P6	Support in part	Waka Kotahi supports the balanced approach adopted in this policy to look at reasonable alternatives, the design of the critical infrastructure to maintain its integrity and function during / after a natural hazard event and any significant adverse effects on people, cultural values and property.	retain as notified
Waka Kotahi NZ Transport Agency	S112.061	NH - Natural Hazards	NH-R1	Support	Waka Kotahi supports these rules	Retain as notified
Waka Kotahi NZ Transport Agency	S112.062	NH - Natural Hazards	NH-R6	Support	Waka Kotahi supports these rules	retain as notified
Waka Kotahi NZ Transport Agency	S112.063	ECO - Ecosystems and Indigenous Biodiversity	ECO-O3	Support	Waka Kotahi supports this objective. as it provides for appropriate development and use within SNAs, which could include critical infrastructure like the state highway network, where the values of the SNAs can be maintained or enhanced.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.064	ECO - Ecosystems and Indigenous Biodiversity	ECO-P2	Support in part	Waka Kotahi supports the intent of this policy as it allows activities within SNAs, where the activity may impact indigenous biodiversity values, where the activity is a lawfully established activity or has a functional need to be located in the area. However, there may be instances where the state highway network has an operational need to be located in these areas. It is recommended that the policy be amended to also include where the activity has an operational need.	Amend the policy as follows: 1. The activity has a functional need or operational need to be located in the area; or
Waka Kotahi NZ Transport Agency	S112.065	ECO - Ecosystems and Indigenous Biodiversity	ECO-P3	Support	Waka Kotahi supports this policy because it recognises that specified infrastructure, which includes state highway infrastructure, that provides significant national or regional benefit, as well as infrastructure that has a functional need or operational need to locate in a particular location where there are no practicable alternative locations, may not be able to avoid adverse effects on a SNA.	Retain as notified

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Waka Kotahi NZ Transport Agency	S112.066	ECO - Ecosystems and Indigenous Biodiversity	ECO-P4	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.067	ECO - Ecosystems and Indigenous Biodiversity	ECO-P9	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.068	ECO - Ecosystems and Indigenous Biodiversity	ECO-P10	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.069	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Support in part	Waka Kotahi supports the permitted activity rule for indigenous vegetation clearance and land disturbance up to a width of 1.0 m from a road, network utility or critical infrastructure for the purpose of the maintenance, replacement or repair of those lawfully established structures, as well as permitting removal of vegetation causing imminent danger to structures and infrastructure. However, we consider that the non-complying activity status for indigenous vegetation clearance and land disturbance required to enable critical infrastructure maintenance/repair/replacement within a SNA that would go beyond the 1m width restriction, as well as new infrastructure works within a SNA, does not appear to align with the more enabling aspects of ECO policies, like ECO-P2, P3 and P4, and that a discretionary activity status may be more appropriate. Lastly, there appears to be an error in the activity status for a discretionary and non-complying activity, as these refer to ECO-R1(2). There is no clause (2) for rule R1.	Amend the rule to provide for indigenous vegetation clearance and land disturbance associated with new critical infrastructure, as well as the repair, replacement and maintenance of existing critical infrastructure, as a discretionary activity. And amend the rule to correct the reference to R1(2) in the discretionary and non-complying activity status section
Waka Kotahi NZ Transport Agency	S112.070	NFL - Natural Features and Landscapes	NFL - General	Not Stated	The terminology and abbreviations used to refer to outstanding natural landscapes and outstanding natural features varies throughout the provisions and headings of this chapter. We suggest that consistent terminology and abbreviations should be used throughout the text of the NFL chapter, and the associated Appendix 5 and the Planning Map index.	Amend the text of the NFL chapter, Appendix 5 and the Planning Map Index, to use consistent terminology and abbreviations to identify outstanding natural features and outstanding natural landscapes.
Waka Kotahi NZ Transport Agency	S112.071	NFL - Natural Features and Landscapes	NFL-R6	Not Stated	We note that two rules, relating to "Indigenous Vegetation Clearance within an identified ONF/L" and "New Roads, farm tracks, walking and cycling tracks within an identified ONF/L" respectively have been erroneously given the rule reference 'NFL-R6'	Correct the rule numbering as noted and make any consequential changes to other provisions as necessary to ensure the correct rule is referenced within them.
Waka Kotahi NZ Transport Agency	S112.072	NFL - Natural Features and Landscapes	NFL-P3	Support	Waka Kotahi supports the general intent of this policy because it provides for new critical infrastructure to locate in ONF and ONL where there is an operational need or functional need to do so, and no alternative locations are available.	Retain as notified

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Waka Kotahi NZ Transport Agency	S112.073	NFL - Natural Features and Landscapes	NFL-R3	Support	Waka Kotahi supports this rule as it permits minor scale land disturbance and earthworks within an identified ONF and ONL, and provides a consenting pathway for such activities that do not comply with this Rule.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.074	NFL - Natural Features and Landscapes	NFL-R4	Support	Waka Kotahi supports this rule as it permits maintenance of critical infrastructure, such as the state highway network, within an ONL and ONF, and provides a consenting pathway for those situations where maintenance works would increase the scale of the critical infrastructure.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.075	NFL - Natural Features and Landscapes	NFL-R6	Support in part	In respect to rule NFL-R6 titled "New Roads, farm tracks, walking and cycling tracks within an identified ONF/L", Waka Kotahi support this rule in part as it provides for the construction of new roads and walking and cycling tracks within an identified ONF and ONL. However, for clarity and consistency with the activities listed in NFL-R4, we recommend that the term 'critical infrastructure' should also be added to the rule heading. This would give more certainty that state highways and other critical infrastructure are provided for in ONF and ONL.	Amend rule heading as follows, or wording of the same intent: New critical infrastructure , New Roads, farm tracks, walking and cycling tracks within an identified ONF/L
Waka Kotahi NZ Transport Agency	S112.076	SUB - Subdivision	SUB-O3	Support in part	Waka Kotahi partly supports this objective in that it seeks to provide infrastructure required as part of subdivision in an integrated, efficient and coordinated manner. However, we do seek an amendment to ensure that existing infrastructure has sufficient capacity to serve the subdivision including any upgrades that are required. Alternatively, insert a new objective with wording to this affect. This relief is sought to provide support to Policy SUB - P7.	Amend SUB - O3 to include wording this effect: Infrastructure required to serve the subdivision of land is provided in an integrated, efficient and coordinated manner and is accommodated within existing infrastructure networks including any upgrades required. Or insert a new objective with wording to this affect.
Waka Kotahi NZ Transport Agency	S112.077	SUB - Subdivision	SUB-P5	Support in part	Waka Kotahi supports this policy as it recognizes the need to avoid or manage the reverse sensitivity effects resulting from the subdivision of land on the State highways with a minor spelling correction.	Retain as notified with minor correction to wording ~~States~~ Highways to read State highways.
Waka Kotahi NZ Transport Agency	S112.078	SUB - Subdivision	SUB-P7	Support in part	Waka Kotahi supports this policy as it recognises the need to ensure that infrastructure networks have the capacity to accommodate the additional demand and require upgrades be completed at the time of subdivision (point 1and ensuring legal and physical access to each lot is provided at the time of subdivision (point 4). Waka Kotahi recommends that the wording 'safe' be inserted within this policy. In addition, we recommend that point 9 be amended to insert the wording 'support active travel modes'. Waka Kotahi seeks that a new point 10. be inserted into the policy that recognises that directing stormwater from subdivision into the State highway stormwater system can overwhelm the existing systems creating flooding issues along the State highway.	Amend as follows: Ensure subdivision is appropriately serviced and integrated with existing or planned infrastructure that is provided in an safe, efficient, integrated and coordinated manner by: ... 9. Encouraging subdivision layout and orientation which supports energy efficiency including active travel (walking and cycling) and conservation for future land uses. 10. Ensuring subdivision design that includes a stormwater system avoids any adverse effects on the safe, efficient and effective operation and function of land transport infrastructure.

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Waka Kotahi NZ Transport Agency	S112.079	SUB - Subdivision	SUB-R4	Support in part	Waka Kotahi generally supports the rule that requires subdivision resulting in no additional lots is a Controlled activity and supports all the stated Matters of control. Waka Kotahi notes that there are provisions for specific situations such as if a site contains historic heritage item, archaeological site listed in a Historic Heritage Schedule SUB - R8 or if a site contains a notable tree SUB - R9 is a Restricted Discretionary Activity. An additional standard is requested that any subdivision resulting in no additional lots created that has a proposed vehicular access to a State highway (be it an existing or new access) is not a controlled but a restricted discretionary activity.	Amend as follows: Subdivision resulting in no additional lots created: Activity Status: Controlled Where: 10. The site does not include a proposed vehicular access to a State highway (existing or new access).
Waka Kotahi NZ Transport Agency	S112.080	SUB - Subdivision	SUB-R5	Support in part	Waka Kotahi supports the rule in particular those Matters of discretion which promote active modes and protect the state highway from reverse sensitivity effects. However, in respect to point 5, we recommend that this matter is amended to include the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the access connects to any State highway.	Amend SUB-R5 as follows: Matters for discretion: 5. The effects of traffic generation on the safe and efficient operation of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the access connects to any State Highway.
Waka Kotahi NZ Transport Agency	S112.081	SUB - Subdivision	SUB-R12	Support	Waka Kotahi supports the rule that subdivision within the Maitai River Floodway is a non-complying activity to appropriately manage the risks of subdivision including associated infrastructure within a known flood zone	Retain as notified
Waka Kotahi NZ Transport Agency	S112.082	SUB - Subdivision	SUB-S1	Support	Waka Kotahi supports this rule where the activity status where compliance is not achieved with minimum lot size for each zone is a non-complying activity.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.083	SUB - Subdivision	SUB-S4	Oppose	Waka Kotahi does not support the exception within the brackets of clause 3, as the State highway has been declared a limited access road adjacent to the DEV1 area. Consequently the number of vehicle crossings onto the highway in this location should be limited to maintain the safe and efficient function of the state highway network. In addition, we consider that this standard does not provide sufficient information to understand the impacts of the development of the DEV1 area on the state highway network. In particular, what upgrades (including funding obligations) may be required to the intersections of Saleyard Road and State Highway 1 (SH1), and Racecourse Road and SH1, to accommodate the intensification in their use arising from development within the DEV1 area. We consider that this information needs to be provided through an Integrated Transport Assessment undertaken by a suitably experienced professional. Waka Kotahi opposes this standard until further information on the impacts on SH1 are provided and certainty is provided through Plan	Include transport thresholds within the DEV1 Outline Development Plan which specify when infrastructure upgrades are required at the intersection of Saleyard Road and State Highway 1, and at the intersection of Racecourse Road and State Highway 1.

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					provisions about the triggers for intersection upgrade.	
Waka Kotahi NZ Transport Agency	S112.084	EW - Earthworks	EW-P1	Support	Waka Kotahi supports this policy in particular Point 3. that provides for the construction, upgrade, maintenance or repair of the transport network.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.085	EW - Earthworks	EW-P3	Support	Waka Kotahi supports this policy in that it recognises the need to limit the bulk and scale of earthworks to ensure that it does not exacerbate inundation and flooding on other sites. Waka Kotahi is aware that poorly planned and timed earthworks can result on adverse effects on the State highway network such as build up of debris blocking drains and surface water flooding.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.086	EW - Earthworks	EW-P5	Support	Waka Kotahi generally supports this policy in that it seeks in Point 5. to ensure that earthworks do not impact on the safe and efficient functioning of the transport network or regionally significant infrastructure.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.087	EW - Earthworks	EW-Exemptions	Support	Waka Kotahi supports the earthworks and land disturbance exemptions, in particular points 10 and 11, because Waka Kotahi undertake earthworks in compliance with resource consents issued by Environment Southland and / or permitted by rules in regional plans as part of its operation of the State highway network.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.088	EW - Earthworks	EW-R7	Support	Waka Kotahi supports this rule and the activity status that applies to the earthwork provisions for each of the zones. In particular Point 3 & 5 that recognise earthworks can in certain weather conditions create an erosion, sediment or dust hazard(s) to the State highway network and Point 7 that recognises vehicle movements to and from a site related to earthworks can have an effect on traffic safety. Vehicles accessing earthwork sites can drag soil onto the State highway creating a hazard and there can be safety concerns about the number of vehicle movements including heavy vehicles using an access.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.089	EW - Earthworks	EW-R8	Support	Waka Kotahi supports this rule and the activity status that applies to the earthwork provisions for each of the zones. In particular Point 3 & 5 that recognise earthworks can in certain weather conditions create an erosion, sediment or dust hazard(s) to the State highway network and Point 7 that recognises vehicle movements to and from a site related to earthworks can have an effect on traffic safety. Vehicles accessing earthwork sites can drag soil onto the State highway creating a hazard and there can be safety concerns about the number of vehicle movements including heavy vehicles using an access.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.090	EW - Earthworks	EW-R9	Support	Waka Kotahi supports this rule and the activity status that applies to the earthwork provisions for each of the zones. In particular Point 3 & 5 that	Retain as notified

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					recognise earthworks can in certain weather conditions create an erosion, sediment or dust hazard(s) to the State highway network and Point 7 that recognises vehicle movements to and from a site related to earthworks can have an effect on traffic safety. Vehicles accessing earthwork sites can drag soil onto the State highway creating a hazard and there can be safety concerns about the number of vehicle movements including heavy vehicles using an access.	
Waka Kotahi NZ Transport Agency	S112.091	EW - Earthworks	EW-R10	Support	Waka Kotahi support EW R10 for the construction, upgrade, maintenance and repair of the transport network and recreational walking and cycling tracks as a permitted activity subject to development standards and non-compliance as a restricted discretionary activity.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.092	EW - Earthworks	EW-R10	Support	Waka Kotahi supports these Matters of discretion in particular, Point 4 & 6, that recognise earthworks can create an erosion, sediment or dust hazard(s) to users of the State highway and Point 7 that recognises that earthworks can impact on natural drainage patterns and redirect overland flow paths or flood flows and Point 8 that recognises vehicle movements to and from a site related to earthworks can have an effect on traffic safety. Vehicles accessing earthwork sites can drag soil onto the State highway creating a hazard and there can be safety concerns about the number of vehicle movements including heavy vehicles using an access.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.093	EW - Earthworks	EW-R13	Support in part	Waka Kotahi generally supports the EW - R13 Matters of direction. However, we seek an additional matter that recognises that vehicle movements to and from a site related to earthworks can have an adverse effect on traffic safety, be included. Vehicles accessing earthwork sites can drag soil onto the State highway creating a hazard and there can be safety concerns about the number of vehicle movements including heavy vehicles using an access. This amendment aligns to other Matters of discretion such as EW - R10 8.	Amend Rule EW - R13 Matters of Discretion as follows: ... 6. Vehicle movements to and from the area is related to the earthworks and the controls to manage adverse effects on traffic safety and amenity.
Waka Kotahi NZ Transport Agency	S112.094	EW - Earthworks	EW-R14	Support	Waka Kotahi supports this rule and these Matters of discretion in particular, Point 4, 6, 7 and 8. Vehicles accessing earthwork sites can drag soil onto the State highway creating a hazard and there can be safety concerns about the number of vehicle movements including heavy vehicles using an access.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.095	EW - Earthworks	EW-S1	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	Retain as notified

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Waka Kotahi NZ Transport Agency	S112.096	EW - Earthworks	EW-S2	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	retain as notified
Waka Kotahi NZ Transport Agency	S112.097	EW - Earthworks	EW-S3	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.098	EW - Earthworks	EW-S4	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.099	EW - Earthworks	EW-S5	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.100	EW - Earthworks	EW-S6	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.101	EW - Earthworks	EW-S7	Support	Waka Kotahi supports these standards and the Matters of discretion that address these adverse effects arising from earthworks.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.102	LIGHT - Light	LIGHT-O2	Support	Waka Kotahi supports this objective in that it recognises artificial outdoor lighting can be beneficial to support activities and enable safety and security, however it can also have obtrusive and adverse effects on the transport network, including the safety of road users, when it is not managed properly.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.103	LIGHT - Light	LIGHT-P1	Support in part	Waka Kotahi generally supports this policy that seeks an appropriate level of artificial lighting be accommodated that maintains the predominant character and amenity within each of the zones. We do however seek clarification on whether the word 'outdoor' be inserted to refer to 'artificial outdoor lighting' to provide consistency in terminology used within this chapter and the 'artificial outdoor lighting' definition in the Plan.	Amend as follows: Enable activities that generate an appropriate level of artificial outdoor lighting for operational and functional purposes while maintaining the predominant character and amenity of each zone
Waka Kotahi NZ Transport Agency	S112.104	LIGHT - Light	LIGHT-R1	Support	Waka Kotahi supports this rule as it manages the emission effects of lighting on the State Highway network.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.105	LIGHT - Light	LIGHT-P2	Support in part	Waka Kotahi generally supports this policy that requires artificial lighting to be located, designed and operated in such a way that it does not adversely affect the safety and security of people and property. Waka Kotahi seeks minor amendments to make the intent of the policy more explicit. We request that the policy not only include 'light spill' but also 'glare' as both terms are applicable in the context of artificial outdoor lighting considerations and both terms are defined within the Plan	Amend LIGHT - P2 as follows: Require artificial outdoor lighting to be located, designed and operated to: 1. control the maximum level of light spill and glare ; 2. manage adverse light spill and glare effects to:
Waka Kotahi NZ Transport Agency	S112.106	LIGHT - Light	LIGHT-R2	Support	Waka Kotahi supports this rule, standards and the activity status that applies to artificial outdoor lighting and light spill.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.107	LIGHT - Light	LIGHT-S1	Oppose in part	Waka Kotahi partly opposes these standards as they do not specifically address the adverse effects of light spill and glare resulting from artificial	Amend LIGHT - S1 to insert a standard for artificial outdoor lighting that has any light spill or glare onto a State highway that aligns with the AS/NZS 4282.2019 Control of the

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					outdoor lighting onto State highways. LIGHT - S1 1 only applies to light spill from any site measured from the notional boundary of any dwelling or building accommodating a sensitive activity & LIGHT - S1 2 & 3 only applies from any site measured at or beyond the site boundary with no specific consideration of the adverse effects on the wider transport network within these rules or within the Matters of discretion. Waka Kotahi therefore requests that appropriate provisions are included within these standards to ensure that artificial outdoor lighting does not adversely impact road user safety through dazzling, distraction or glare. In this regard, we seek a specific provision to control light spill or glare from artificial outdoor lighting sources onto State highways that aligns with AS/NZS 4282.2019 being the New Zealand and Australian Standard outlining best practice in controlling the obtrusive effects of outdoor lighting.	Obtrusive Effects of Outdoor Lighting
Waka Kotahi NZ Transport Agency	S112.108	LIGHT - Light	LIGHT-S2	Oppose in part	Waka Kotahi partly opposes these standards as they do not specifically address the adverse effects of light spill and glare resulting from artificial outdoor lighting onto State highways. LIGHT - S2 5 which includes maximum level of light spill in terms of horizontal or vertical illuminance states that it excludes roads. Waka Kotahi therefore requests that appropriate provisions are included within these standards to ensure that artificial outdoor lighting does not adversely impact road user safety through dazzling, distraction or glare. In this regard, we seek a specific provision to control light spill or glare from artificial outdoor lighting sources onto State highways that aligns with AS/NZS 4282.2019 being the New Zealand and Australian Standard outlining best practice in controlling the obtrusive effects of outdoor lighting.	Amend LIGHT - S2 to insert a standard for artificial outdoor lighting that has any light spill or glare onto a State highway that aligns with the AS/NZS 4282.2019 Control of the Obtrusive Effects of Outdoor Lighting
Waka Kotahi NZ Transport Agency	S112.109	NOISE - Noise	NOISE-O3	Support	The objective is supported by Waka Kotahi	Retain as notified
Waka Kotahi NZ Transport Agency	S112.110	NOISE - Noise	NOISE-P3	Support in part	This policy suitably reflects NOISE-O3. However, we suggest that the wording of the policy be amended to clearly identify that buildings, as referred to in this policy, include both new buildings, as well as additions and alterations to existing buildings that will be used by noise sensitive activities, which would align with the description used in rule NOISE-R7 that this policy relates to and also appropriately reflect the importance of managing the impacts of noise from the operation of the highway and railway on noise sensitive activities that establish in altered buildings and additions to existing buildings	Amend NOISE-P3 as follows, or words of similar intent: Require acoustic treatment within new buildings and additions to and alterations to buildings used by noise sensitive activities in the following locations:
Waka Kotahi NZ Transport Agency	S112.111	NOISE - Noise	NOISE-R1	Support in part	n general Waka Kotahi supports this rule as it provides a permitted activity status for noise from construction activities where specified noise	Amend this rule to ensure that clauses 1 and 2 refer to the correct Tables in the Noise chapter, and make any consequential changes to other provisions including the NOISE Tables as necessary. If Table 4 has been accidentally omitted from the notified Plan, Waka

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					management parameters are met. Clause 3 of this rule appropriately references NZS6803:1999 as the standard to be used for measuring and assessing construction noise. However, it is noted that there appears to be an error in clause 2 of this rule, as it refers to Table 4. Table 4 does not exist within the NOISE chapter of the notified plan. Consequently, it appears that either Table 4 is missing or the reference to Table 4 within this rule is erroneous	Kotahi would like the opportunity to review and comment on it given its potential to impact upon construction activities undertaken by Waka Kotahi.
Waka Kotahi NZ Transport Agency	S112.112	NOISE - Noise	NOISE-R7	Support in part	Waka Kotahi support this rule in part as it requires habitable rooms within a new building, as well as habitable rooms within an addition to or alteration to an existing building that are used for a noise sensitive activity, and are located within the state highway noise control overlay, are designed to comply with the internal noise levels and ventilation requirements of NOISE-S3. However, we consider that this rule should also apply to existing buildings that are relocated onto a site for use by a noise sensitive activity. It is not clear whether 'construction' referenced in the title of this rule would include relocated buildings and we request that the Council provide clarification on this matter. We suggest that either the rule title is amended to make this clear, and/or that an advice note is included to this end. The Waka Kotahi submission seeks to introduce a different state highway noise control overlay to that in the notified plan. Our proposed state highway noise control overlay is discussed in a separate submission point (Part 4, Appendices & Map, Noise Control Overlay). The changes we are proposing to the state highway noise control overlay do not require any amendment to the reference to that overlay in NOISE-R7(1)(b).	Clarify whether this rule is intended to apply to relocated buildings used for noise sensitive activities. If it is, amend the title of the rule as follows, or using words of similar intent, and make consequential changes to other related provisions as necessary: Construction of, additions to or alterations to buildings, and relocated buildings , for a noise sensitive activity And/or, include an advice note, as follows or using words to similar effect: Advice Note: NOISE-R7(1) includes buildings that have been constructed offsite and subsequently relocated and placed within the railway corridor overlay and/or the state highway noise control overlay.
Waka Kotahi NZ Transport Agency	S112.113	NOISE - Noise	NOISE-S3	Support in part	Waka Kotahi in principle supports the inclusion of this standard, as it stipulates internal design noise levels to be achieved through acoustic treatment of buildings containing a noise sensitive activity. However, we note that clause (1) of this Standard limits the acoustic treatment requirements to only "new" buildings. We suggest that these requirements should also be met for all additions to and alterations of existing buildings that could contain a noise sensitive activity, including relocated buildings, and to be consistent with associated rule NOISE-R7. We also note that this standard uses noise metrics that should not be applied to road noise (those used are contrary to National Planning Standards) and it does not give criteria for other types of noise sensitive activities. We recommend that the noise limits from Table 1 of the Section 32 report, which is attached as Attachment 3 to this submission, is inserted into NOISE-S3 and used instead of the existing Table to	Amend the wording of clause (1) to as follows, or use similar wording that achieves the same intent: 1. The following internal noise levels shall be met for any new building, or alterations to or additions to any existing building, including relocated buildings , containing a noise sensitive activity: And Insert Table 1, taken from the Section 32 report attached as Attachment 3 of this submission, into this standard and amend the wording of the standard so that that Table is used to define internal noise levels within buildings used for noise sensitive activities located within the State Highway Noise Control Overlay. And make the following amendments to clause 2: Include a lower limit of 18 degrees Celsius into (a) ; and Add a minimum air flow of 1 change per hour into (b) ; and Change (c) so that the noise limit applies at 1 metre and not 2 metres , and delete the following text from (c) ~~"once the room temperature has been achieved"~~ ; and Change the three notes so that they become explicitly part of the standard rather than potentially being advice.

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					define internal noise levels within buildings used for noise sensitive activities located within the State Highway Noise Control Overlay. It is also our view that the temperature specification in clause 2(a) should include a lower limit of 18 degrees Celsius; clause 2(b) should be amended to add a minimum air flow of 1 change per hour; that clause 2(c) should be changed so that the noise limit applies at 1 metre and not 2 metres; the following text "once the room temperature has been achieved" in clause 2(c) should be deleted; and change the notes to be explicitly part of the standard rather than potentially being advice	
Waka Kotahi NZ Transport Agency	S112.114	SIGN - Signs	SIGN-O2	Support in part	Waka Kotahi generally supports this objective as it recognises that signs can adversely affect the safety of the users of the transportation network including pedestrians and cyclists. Poorly placed or designed signs can have the potential to distract drivers, create obstacles for pedestrians and cyclists causing safety, efficiency and effectiveness issues within the transport network. Waka Kotahi therefore recommends an amendment to include the words 'efficiency and effectiveness' to make the intent of the objective more explicit and maintain consistency with the terminology used within the Government Policy Statement on Land Transport 2021/2022 - 2030/2031.	Amend SIGN - O2 as follows: Signage does not affect the safety, efficiency and effectiveness of users of the transportation network, including pedestrians and cyclists.
Waka Kotahi NZ Transport Agency	S112.115	SIGN - Signs	SIGN-P1	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.116	SIGN - Signs	SIGN-P2	Support	Waka Kotahi supports these policies	Retain as notified
Waka Kotahi NZ Transport Agency	S112.117	SIGN - Signs	SIGN-P3	Support in part	Waka Kotahi generally supports this policy as it recognises that signs can adversely affect the safety of the users of the transportation network including pedestrians. Poorly placed or designed signs can have the potential to distract drivers and create obstacles for pedestrians and cyclists causing safety issues within the transport network. Waka Kotahi recommends an amendment to include the word 'cyclists', as they are not captured within the definition of 'pedestrian' but can equally be adversely affected by inappropriate signage	Amend SIGN - P3 as follows: Ensure signs are of a type, scale and design which is appropriate for the location by having regard to the following 1. the safety of road users including pedestrians and cyclist
Waka Kotahi NZ Transport Agency	S112.118	SIGN - Signs	SIGN-P5	Support in part	Waka Kotahi generally supports this policy as it provides for temporary signs including offsite temporary signs where the duration, size and number are limited to maintain the character and visual amenity of the surrounding area. Waka Kotahi note that temporary signs particularly offsite signs can have an adverse effect on the safety, efficiency and effectiveness of the transport network. We therefore recommend an amendment to this policy to address this concern.	Amend SIGN - P5 as follows or using words of similar intent: Provide for temporary signs, including off-site temporary signs where their duration, size and number are limited to maintain the character and visual amenity of the surrounding area and to ensure the safe, efficient and effective function and operation of the transport network.

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Waka Kotahi NZ Transport Agency	S112.119	SIGN - Signs	SIGN-Additional provisions sought	Not Stated	Waka Kotahi note that signs (except official signs) located within a State highway are managed by Waka Kotahi New Zealand Transport Agency under the Signs on State Highways Bylaw 2010 and Traffic Control Devices Manual 2011 - Part 3 Advertising Signs, except that this does not apply to any sign constructed, maintained and displayed behind the kerbline of any State highway in an area where a 50 kilometre per hour, or lesser, speed limit applies, which are regulated by the territorial authority. We therefore seek an advisory note be inserted into this Chapter for clarification purposes.	Amend to include Note 2: Signs located within or partly within a State highway are managed and assessed by Waka Kotahi New Zealand Transport Agency in accordance with the New Zealand Transport Agency's 'State Highways Bylaw 2010' and 'Traffic Control Devices Manual 2011 - Part 3 Advertising Signs'. Except that this does not apply to any sign constructed, maintained and displayed behind the kerbline of any State highway in an area where a 50 kilometre per hour, or lesser, speed limit applies, which are regulated by the territorial authority.
Waka Kotahi NZ Transport Agency	S112.120	SIGN - Signs	SIGN-R1	Support	Waka Kotahi supports this rule	Retain as notified
Waka Kotahi NZ Transport Agency	S112.121	SIGN - Signs	SIGN-R2	Support in part	Waka Kotahi generally supports the Matters of discretion that provide for the erection of temporary signs while managing the effects on amenity and heritage values of the surrounding area and the effects on road safety. However, we seek an amendment to SIGN R2 4. to include consideration on the extent to which the temporary sign will impact on safety, efficiency and effectiveness of the wider transport network including the State highway network and the outcomes of consultation with Waka Kotahi for the erection of the temporary sign.	Amend SIGN - R2 Matters of discretion as follows, or using words of similar intent: 4. ~~Effects on road safety.~~ The extent to which the temporary sign will impact on the safety, efficiency and effectiveness of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the sign is visible from any State Highway.
Waka Kotahi NZ Transport Agency	S112.122	SIGN - Signs	SIGN-R3	Support	Waka Kotahi supports this rule	Retain as notified
Waka Kotahi NZ Transport Agency	S112.123	SIGN - Signs	SIGN-R4	Support	Waka Kotahi supports this rule	Retain as notified
Waka Kotahi NZ Transport Agency	S112.124	SIGN - Signs	SIGN-R4	Support in part	Waka Kotahi generally supports the Matters of discretion that provide for the erection of these signs while managing the effects on amenity and heritage values of the surrounding area and the effects on road safety. However, we seek an amendment to SIGN - R4 10. to include consideration of the outcomes of consultation with Waka Kotahi for the erection of the sign that is visible from the State highway network	Amend SIGN - R4 Matters of discretion as follows: 10. Effects on road user and footpath user safety, including motorists, cyclists and pedestrians. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the sign is visible from any State Highway
Waka Kotahi NZ Transport Agency	S112.125	SIGN - Signs	SIGN-R5	Support	Waka Kotahi generally supports this rule	Retain as notified
Waka Kotahi NZ Transport Agency	S112.126	SIGN - Signs	SIGN-R5	Support in part	Waka Kotahi generally supports this rule in that it allows for freestanding signs as a permitted activity subject to amendments. Waka Kotahi generally supports the Matters of discretion to ensure consideration is given to the effects of the sign on the surrounding environment including on road user and footpath user safety. However, we seek an amendment to SIGN - R5 4. to include consideration on the outcomes of consultation with Waka Kotahi for the erection of the sign that is visible from the State highway network.	Retain but amend the SIGN - R5 Matters of discretion to insert the following: 4. Effects on road user and footpath user safety including motorists, cyclists and pedestrians. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the sign is visible from any State Highway

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Waka Kotahi NZ Transport Agency	S112.127	SIGN - Signs	SIGN-R6	Support	Waka Kotahi supports this rule	Retain as notified
Waka Kotahi NZ Transport Agency	S112.128	SIGN - Signs	SIGN-R6	Support in part	Waka Kotahi generally supports the Matters of discretion to ensure consideration is given to the effects of the cultural marker on the surrounding environment including on road user and footpath user safety. However, we seek an amendment to include a new Matter of discretion as to the outcomes of consultation with Waka Kotahi for the erection of the cultural marker that is visible from the State highway network.	Amend the SIGN - R6 Matters of discretion to insert the following: 6. This outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the cultural marker is visible from any State Highway.
Waka Kotahi NZ Transport Agency	S112.129	SIGN - Signs	SIGN-R7	Oppose in part	Waka Kotahi generally opposes this rule as it applies to digital signs visible from a State highway in the Town Centre, Local Centre, Mixed use, Field Days and Light and General Industrial Zones as a permitted activity. Waka Kotahi notes that digital signs are designed to capture vehicle occupant attention and that we would oppose digital signs visible from a State highway where there is a safety risk. In accordance with the approach recommended in the New Zealand Transport Agency's 'Third Party Signs on and visible from the State Highway Corridor Planning & Policy Manual (30th June 2023) Version 1.1', we seek an amendment to SIGN - R7 to insert a new standard that excludes signs visible from a State highway as a permitted activity. This would require all digital signs visible from a State highway to obtain a restricted discretionary activity resource consent and thereby allow the application to be assessed by Waka Kotahi to determine the impact on the safety, efficiency and effectiveness on the State highway network. Waka Kotahi does note its support for the non-complying status of all digital signs located in all other zones. This is on the basis that these signs of this nature (outside of commercial and industrial zones) are likely to cause a higher safety risk to road users.	Amend SIGN - R7 Digital Signs Where 3. The sign is not visible from a State highway. Activity status where compliance is not achieved with: SIGN-R7(1) and (3): Restricted Discretionary
Waka Kotahi NZ Transport Agency	S112.130	SIGN - Signs	SIGN-R7	Oppose in part	In light of the submission above, Waka Kotahi seeks a new Matter of discretion be inserted to ensure consideration is given to the effects of the signs on the safety, efficiency and effectiveness of the State highway network and the outcomes of consultation with Waka Kotahi for the erection of the digital sign visible from the State highway network.	Amend SIGN - R7(3), Matters of Discretion, as follows: 2. The extent to which the digital sign will impact on the safety, efficiency and effectiveness of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the sign is visible from any State Highway.
Waka Kotahi NZ Transport Agency	S112.131	SIGN - Signs	SIGN-Additional provisions sought	Support in part	Waka Kotahi notes that while some of the SIGNS standards align or partly align with the best practical design principles in Waka Kotahi NZ Transport Agency's 'Third Party Signs on and visible from the State Highway Corridor' Planning & Policy Manual (30th June 2023) Version 1.1 document, the majority of the standards are specific to safety requirements for signs visible to the local road network.,	See page 47-50 of original submission on requested changes to SIGN standards including tables

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					See page 47-50 on requested changes to SIGN standards.	
Waka Kotahi NZ Transport Agency	S112.132	SIGN - Signs	SIGN-Additional provisions sought	Not Stated	Waka Kotahi seek to insert a restricted discretionary activity status for S1-S7 where compliance is not achieved with the SIGNS standards state above and a new Matter of discretion be inserted to ensure consideration is given to the effects of the signs on the safety, efficiency and effectiveness of the State highway network and the outcomes of consultation with Waka Kotahi for the erection of the sign visible from the State highway network.	Amend SIGN - S1 to S7, Matters of Discretion, as follows: The extent to which the sign will impact on the safety, efficiency and effectiveness of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the sign is visible from any State Highway.
Waka Kotahi NZ Transport Agency	S112.133	SIGN - Signs	SIGN-S1	Support in part	Waka Kotahi supports the intent of clause (1) of this standard, however we note that the term 'transport corridor' is undefined in the Plan and therefore it is unclear exactly what area this is intended to cover. We suggest that the Council clarify the area intended to be encapsulated by a 'transport corridor' within this provision and/or provide a definition for 'transport corridor' in the Interpretation chapter of the Plan, to provide clarity around the interpretation and implementation of this Standard.	Clarify the area intended to be encapsulated by a 'transport corridor' within this provision and/or provide a definition for 'transport corridor' in the Interpretation chapter of the Plan, to provide clarity around the interpretation and implementation of this Standard.
Waka Kotahi NZ Transport Agency	S112.134	SIGN - Signs	SIGN-S3	Support in part	Waka Kotahi considers that, in respect to clause (b), it is appropriate that still images are displayed for a minimum duration of no less than ten seconds (i.e. for longer than 10 seconds). However, the use of the word 'not' in clause 1 creates a double-negative, and consequently alters the interpretation of the minimum dwell time in clause (b) in a way which is unintended and erroneous. Similarly, we consider that the wording of clause (f) is unclear, perhaps as a result of accommodating the term 'not' in clause 1. Waka Kotahi suggests a minimum of 0.5 second dissolve transition between images is appropriate and that clause (f) should be amended to clearly reflect that.	Amend SIGN - S3 as follows or words of similar intent: 1. Digital signs must not: .. b) display still images for a duration of ~~no~~ less than 10 seconds. ... (f) take less time than 0.5 seconds to dissolve transition between still images ~~apart from cross dissolve of a maximum of 0.5 seconds.~~
Waka Kotahi NZ Transport Agency	S112.135	TEMP - Temporary Activities	TEMP-P6	Support	Waka Kotahi supports this policy in that it recognizes that temporary activities can adversely affect State highways either from construction traffic from developments or large gatherings that attract an extraordinary number of vehicles to a site. It is important that these activities / events have traffic management in place approved by the appropriate roading authority to ensure that safety and efficiency of the transport networks are not compromised.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.136	TEMP - Temporary Activities	TEMP-R1	Support in part	Waka Kotahi generally supports this rule as it places limits on the size (max number of persons on the site of the event does not exceed 1,000 including staff / organisers), location, duration and hours of operation of an event. However, temporary events can generate increased traffic which has the potential to adversely affect the	Amend the Matters of discretion for TEMP - R1 (1) to TEMP (7) as follows, or using words of the same intent:... 8. The extent to which the temporary activity will impact on the safety, efficiency and effectiveness of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the temporary event gains direct access onto the State highway.

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					State highway network. Waka Kotahi therefore requests that amendments be made to TEMP - R1 to include an additional Matter of discretion relating to the extent to which the temporary activity will affect the transport network as well as the outcomes of consultation with Waka Kotahi where the temporary event gains direct access onto the State highway.	
Waka Kotahi NZ Transport Agency	S112.137	GRZ - General Residential Zone	GRZ-P7	Support in part	Waka Kotahi generally supports this policy in that it addresses the need for development to be consistent with the capacity of the existing infrastructure network, specifically low impact approaches to stormwater. However, we are also concerned as to whether the development can be accommodated within the existing infrastructure and transportation networks and whether any upgrades will be required. Waka Kotahi therefore seeks an amendment to policy to this affect.	Amend GRZ - P7 as follows: Ensure development is designed consistent with the capacity of existing infrastructure and transportation networks or will be appropriately upgraded and, where practicable, incorporates low impact approaches to stormwater management.
Waka Kotahi NZ Transport Agency	S112.138	MRZ - Medium Density Residential Zone	MRZ-O3	Support	Waka Kotahi supports this objective as it encourages a compact urban form that reduces the number of vehicle movements required to access town and neighborhood centres, public amenities and open spaces.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.139	MRZ - Medium Density Residential Zone	MRZ-P1	Support	Waka Kotahi supports this policy as it encourages active modes of transport, less reliance on cars and reduces overall carbon emissions.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.140	MRZ - Medium Density Residential Zone	MRZ-P11	Support in part	Waka Kotahi generally supports this policy in that it addresses the need for development to be consistent with the capacity of the existing infrastructure network, specifically low impact approaches to stormwater. However, we are also concerned as to whether the development can be accommodated within the existing infrastructure and transportation networks and whether any upgrades will be required. Waka Kotahi therefore seeks an amendment to this affect.	Amend MRZ - P11 as follows: Ensure development does not compromise existing infrastructure and transportation networks, including infrastructure capacity, or will be appropriately upgraded , and, where practicable, incorporates low impact approaches to stormwater management.
Waka Kotahi NZ Transport Agency	S112.141	MRZ - Medium Density Residential Zone	MRZ-PREC7-P1	Support	Waka Kotahi supports this policy as it seeks to accommodate development within the hospital precinct that provides opportunities for transport choice, including integration with public and community transport where possible.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.142	MRZ - Medium Density Residential Zone	MRZ-PREC9-P1	Support in part	Waka Kotahi generally supports this policy in that it considers the pedestrian traffic environment to enable people to safely walk through the parking area. However, we recommend an amendment to address the safe, efficient and effective operation of the surrounding transportation network.	Enable light industrial and commercial activities in the Historic Dairy Factory Precinct that; 6. maintains the safe, efficient and effective operation of the surrounding transportation network including State highways.
Waka Kotahi NZ Transport Agency	S112.143	GRUZ - General Rural Zone	GRUZ-P9	Support in part	Waka Kotahi generally supports this policy in that it seeks to provide for small scale industrial activity, commercial activity and other non-rural activities providing they can demonstrate that the activity will not adversely impact the safe and efficient operation of the road network, and there is suitable loading, manoeuvring and access provided	Amend GRUZ - P9 as follows, or words of similar intent: Provide for small scale industrial activity, commercial activity, and other non-rural activities, where it can be demonstrated that: ... 5. there is adequate infrastructure available to service the activity, including on-site servicing where reticulated services are not available and any new or existing access(es) onto roads that require upgrading. 9. there are measures to internalise effects and avoid conflict and potential reverse sensitivity effects on activities anticipated in the Zone, including primary production and ancillary residential activity and between sensitive

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					on site. It is anticipated that these types of activities would occur around the State highway network. Waka Kotahi recommends an amendment to point 5 to clarify that the access(es) to the site may require upgrading to accommodate the new or increase in scale of these identified activities. The policy also notes that non-rural activities (i.e. potential noise sensitive activities) must demonstrate that there are measures in place to internalise effects and avoid conflict and potential reverse sensitivity effects on activities anticipated in the zone, including ancillary residential activity. However, we recommend for clarity purposes an amendment to point 9 to include the relationship between sensitive activities and the State highway network.	activities and the State highway network.
Waka Kotahi NZ Transport Agency	S112.144	GRUZ - General Rural Zone	GRUZ-P11	Support	Waka Kotahi supports this policy in that it seeks to avoid activities that are incompatible with the zone unless there is an operational or functional need to locate there. Waka Kotahi supports this policy on the basis that the use and development of land not foreseen within the zone can place additional unplanned demands on existing infrastructure including State highways.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.145	GRUZ - General Rural Zone	GRUZ-PREC13-P1	Support	Waka Kotahi supports this policy as it is directive about avoiding access from State Highway 1 for large scale rural industry activities. This will ensure vehicles associated with this activity will access the site from the local road network and the safe, efficient and effective operation of SH1 is not impeded.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.146	RLZ - Rural Lifestyle Zone	RLZ-P7	Support	Waka Kotahi supports this policy in that it seeks to avoid activities that are incompatible with the zone unless there is an operational or functional need to locate there. Waka Kotahi supports this policy on the basis that the use and development of land not foreseen within the zone can place additional unplanned demands on existing infrastructure including State highways.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.147	RLZ - Rural Lifestyle Zone	RLZ-R8	Support	Waka Kotahi supports this rule in that rural produce retail activities are permitted providing the access is not from a State highway and non-compliance as a Restricted Discretionary Activity. This is on the basis that these types of roadside retail activities are well known to cause traffic safety issues with vehicles exiting / entering the State highway network. There are other known issues associated with overflow parking along State highways to access these stalls and associated roadside stall signage issues creating traffic safety issues.	Retain as notified

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Waka Kotahi NZ Transport Agency	S112.148	RLZ - Rural Lifestyle Zone	RLZ-R8	Support in part	Waka Kotahi further request that amendments be made to RLZ - R8 Matters of discretion for rural produce retail activities to include whether Waka Kotahi approval has been given to the to the gaining direct access from the State highway.	Amend RLZ - R8 Matter of discretion as follows: 8. The extent to which the rural produce retail activity will impact on the safety, efficiency and effectiveness of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency.
Waka Kotahi NZ Transport Agency	S112.149	SETZ - Settlement Zone	SETZ-PREC8-R7	Support in part	Waka Kotahi generally supports this rule as it places limits on the size (max number of persons on the site of the event does not exceed 1,000), location, duration and hours of operation of an event. However, temporary events can generate increased traffic which has the potential to adversely affect the State highway network. Waka Kotahi therefore requests that amendments be made to the rule to include a Matter of discretion as to outcome of consultation with Waka Kotahi where the temporary event gains direct access from the State highway	Amend TEMP - R1 (1) to TEMP (7) Matters of discretion: 5. The extent to which the temporary event will impact on the safety, efficiency and effectiveness of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency.
Waka Kotahi NZ Transport Agency	S112.150	SETZ - Settlement Zone	SETZ-PREC8-R9	Oppose in part	Waka Kotahi generally opposes the provision of conference facilities as a permitted activity. We are concerned that there does not appear to be any consideration of the likely transportation effects associated with a conference facility in this zone. Conference facilities have the potential to generate a significant amount of traffic on the surrounding road networks. Appropriate performance standards are required in the rule to limit the scale of this activity in this zone (i.e. frequency of conferences and number of attendees). This will provide clarification and guidance on how much and how often these events would occur and what the likely impacts are on the surrounding State highway network will be.	Amend SETZ - PREC8 - R9 to insert performance standards that apply to a conference facility within the rule. These are to include clarification on the frequency of events, hours of operation, number of attendees and the type of building the conference is being undertaken in. This will provide a guidance and understanding of the amount of traffic anticipated from any new facility.
Waka Kotahi NZ Transport Agency	S112.151	MUZ - Mixed Use Zone	MUZ-P2	Support in part	Waka Kotahi generally supports this policy as it requires activities to be managed to be compatible with the purpose and predominant character of the zone. However, we do recommend an amendment to further clarify that infrastructure also includes land transport infrastructure.	Amend MUZ - P2 as follows: Manage activities which are potentially compatible with the purpose and predominant character of the Mixed Use Zone where: 4. the activity can be adequately serviced with existing and planned infrastructure including land transport infrastructure;
Waka Kotahi NZ Transport Agency	S112.152	TCZ - Town Centre Zone	TCZ-P3	Support	Waka Kotahi supports this policy in that it provides for a safe pedestrian traffic environment through the design and location of any parking areas and vehicle access. It is noted that the State highway is the main road through this zone, and it is therefore important that active travel modes are promoted where possible, and that any use of parking and access from vehicles is carefully managed.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.153	TCZ - Town Centre Zone	TCZ-P7	Support in part	part Waka Kotahi generally supports this policy as it requires activities consider the overall design and location of any parking areas, vehicle access, and servicing arrangements to maintain streetscape amenity and pedestrian safety. However, we do	Amend as follows: Manage activities which are potentially compatible with the purpose and predominant character of the Town Centre Zone where: 4. there is adequate existing and/or planned infrastructure including transport infrastructure to service the activity; and / or

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					recommend amendments to further clarify that infrastructure also includes land transport infrastructure.	
Waka Kotahi NZ Transport Agency	S112.154	TCZ - Town Centre Zone	TCZ-R14	Support	Waka Kotahi supports this rule that restricts car parking areas from locating within the PREC 3 Town Centre core precinct thereby encouraging active transport modes.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.155	LIZ - Light Industrial Zone	LIZ-Overview and Purpose	Support in part	A statement is made within the Development Area section of this chapter that growth within the new general industrial zoning to the south of Gore, as identified on the DEV1 Outline Development Plan (ODP), will occur in a 'co-ordinated manner' and a 'staged fashion', to provide good levels of connectivity, among other things. However, it is unclear to Waka Kotahi how this staging is to be achieved as neither the subsequent provisions in the chapter, or the Outline Development Plan for DEV1, address staging. If the Council knows how the staging is to occur, it would be useful for this to be detailed in the Plan and on the Outline Development Plan for DEV1. Moreover, if the Council knows how the staging is to occur, and the corresponding traffic generation expected at each stage, Waka Kotahi could offer thresholds identifying when the existing intersections of Saleyard Road and State Highway 1 (SH1), and Racecourse Road and SH1, would need to be upgraded to accommodate the intensification in their use that will arise from the development of the DEV1 area. In the absence of clear staging, Waka Kotahi would assume that development of the DEV1 area will be developer-led and resource-consent led.	Further clarification is sought from the Council about how the staging or sequencing of this area is intended to be managed. Amend the provisions in this chapter and/or the Outline Development Plan for the DEV1, to make it clear how staging will occur in the new DEV1 Light Industrial area south of Gore.
Waka Kotahi NZ Transport Agency	S112.156	LIZ - Light Industrial Zone	LIZ-P3	Support	Waka Kotahi supports this policy because it requires that activities that generate significant amount of dust discharges are avoided. Cross boundary dust discharges, where those discharge cross a state highway, can adversely affect driver visibility.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.157	LIZ - Light Industrial Zone	LIZ-P4	Support	Waka Kotahi supports this policy as it requires outdoor storage areas and service areas to be screened along road boundaries, such as with the State highway, to avoid cross boundary effects.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.158	LIZ - Light Industrial Zone	LIZ-S6	Support in part	Waka Kotahi supports in part this standard because it requires landscaping along the frontage of a site but does not manage the actual or potential effects of that landscaping on the highway network. Inappropriate plant choice could result in the landscape strips obstructing visibility to and from a vehicle crossing or intersection, cause shading/icing on the road network, or maintenance issues for road controlling authorities as a result of such	Amend the standard as follows or using words with the same intent: 1. A landscaping strip with an average width of 2 metres along the frontage of the site is provided., ~~E~~ except for any area required for vehicle or pedestrian access and for any site within the Creamoata Precinct, where: (a) the plants do not result in any of the following effects on the road network: (i) the visual obstruction of sight lines to and from any vehicle crossing or intersection; (ii) shading, causing icing of the road carriageway; (iii) branches or foliage that overhangs the road corridor; (iv) plant debris, especially from deciduous plants, that could block drainage systems within the road corridor. Add an additional matter for discretion, where compliance is not achieved with the standard, as follows: 3.

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					matters as branches overhanging the road corridor or debris from deciduous plants blocking drainage systems.	The effect of the non-compliance on the safe, efficient and effective function of the road network.
Waka Kotahi NZ Transport Agency	S112.159	LIZ - Light Industrial Zone	LIZ-S9	Support in part	Waka Kotahi supports in part this standard as it requires on-site service areas to be screened from a road by a 1.8m fence or landscaping. We suggest that the standard be amended to require that, where that landscaping involves plants adjacent to a road, the planting doesn't adversely affect the road. We also suggest that the provision be amended to include an additional clause, to prevent the effects of any unconsolidated materials located within an outdoor storage area from becoming windblown and causing cross-boundary nuisance effects, like diminishing visibility on a road. We also recommend some additional associated matters of discretion, where compliance with the standard cannot be achieved.	Amend the standard to add clause (3) and a sixth matter of discretion as follows, or with words of similar intent: 3.Unconsolidated materials such as soil, coal, sawdust, powdered fertiliser are to be covered or otherwise secured from being blown by the wind. And Matters of discretion: ... 6. Any adverse effects on the road network.
Waka Kotahi NZ Transport Agency	S112.160	GIZ - General Industrial Zone	GIZ-Overview and Purpose	Support in part	A statement is made within the Development Area section that the growth within the general industrial zoning to the south of Gore will occur in a co-ordinated manner/staged fashion, to provide good levels of connectivity, among other things, however it is unclear to Waka Kotahi how this is to be achieved as the subsequent provisions in the chapter, or the Outline Development Plan for DEV1, do not make this clear.	Further clarification is sought from the Council about how the staging or sequencing of this area is intended to be managed. Amend the provisions in this chapter to make it clear how staging will occur in the new General Industrial area south of Gore (DEV1).
Waka Kotahi NZ Transport Agency	S112.161	GIZ - General Industrial Zone	GIZ-S6	Support in part	Waka Kotahi supports in part this standard because it requires landscaping along the frontage of a site but does not manage the actual or potential effects of that landscaping on the highway network where a site fronts the highway. Inappropriate plant choice could result in the landscape strips obstructing visibility to and from a vehicle crossing or intersection, cause shading/icing on the road network, or maintenance issues for road controlling authorities as a result of such matters as branches overhanging the road corridor or debris from deciduous plants blocking drainage systems.	Amend the standard as follows or words with the same intent: 1. A landscaping strip with an average width of 2 metres along the frontage of the site is provided.,Eexcept for any area required for vehicle or pedestrian access, where: (a) the plants do not result in any of the following effects on the road network: (i) the visual obstruction of sight lines to and from any vehicle crossing or intersection; (ii) shading, causing icing of the road carriageway; (iii) branches or foliage that overhangs the road corridor; (iv) plant debris, especially from deciduous plants, that could block drainage systems within the road corridor. Add an additional matter of discretion, where compliance is not achieved with the standard, as follows: 3. The effect of the non-compliance on the safe, efficient and effective function of the road network.
Waka Kotahi NZ Transport Agency	S112.162	GIZ - General Industrial Zone	GIZ-S8	Support in part	Waka Kotahi supports in part this standard as it requires on-site service areas to be screened from a road by a 1.8m fence or landscaping. We suggest that the standard be amended to require that, where that landscaping involves plants adjacent to a road, the planting doesn't adversely affect the road. We also suggest that the provision be amended to include an additional clause, to prevent the effects of any unconsolidated materials located within an outdoor storage area from becoming windblown and causing cross-boundary nuisance effects, like diminishing visibility on a road. We also recommend some additional associated matters of discretion, where compliance with the standard cannot be achieved.	Amend the standard to include an additional clause (3) and a sixth matter of discretion as follows, or with words of similar intent: 3. Unconsolidated materials such as soil, coal, sawdust, powdered fertiliser are to be covered or otherwise secured from being blown by the wind. And matters of discretion: ... 6. Any adverse effects on the road network.

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Waka Kotahi NZ Transport Agency	S112.163	SARZ - Sports and Active Recreation Zone	SARZ-P5	Support in part	Waka Kotahi generally supports this policy as it seeks to manage any traffic and parking effects that might arise from activities within the zone. As several facilities are located adjacent to the State highway network (i.e. A&P Showgrounds), this will help to maintain access to these areas and ensure the continued safe, efficient and effective operation of the State highway. We do recommend an amendment to point. 3 to alter the wording 'sufficient' to 'appropriate' infrastructure and include a reference to land transport infrastructure. In addition, we recommend an amendment to point 4. to ensure that signage does not affect the safety of users of the transportation network.	Amend SARZ - P5 as follows: Require effects generated by activities to be of a type, scale and level that are appropriate in the Sport and Active Recreation Zone and to maintain the character and amenity of the zone by 3. providing ~~sufficient~~ appropriate infrastructure including land transport infrastructure and services to meet the activity's needs; 4. ensuring the size, design and type of signage is compatible with the character and amenity of the open space area that the signage is located in and does not affect the safety of users of the transportation network, including pedestrians and cyclists.
Waka Kotahi NZ Transport Agency	S112.164	AIRPZ - Airport Zone	AIRPZ-P4	Support	Waka Kotahi supports as this policy seeks to ensure all activities are designed and operated in a way that does not adversely affect the safety and functionality on arterial roads. As the airport is connected to SH1, this policy recognizes the importance of activities occurring in this zone that might impact the functioning of SH1.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.165	DEV - Development Areas	DEV1-Overview and Purpose	Support in part	Waka Kotahi considers that the effects on both the adjoining landowners and the State highway network arising from the development of the DEV1 development area should be identified within the 'Context' section of the chapter. As such, we suggest that the text be amended to include greater recognition of the need for the effects on the state highway to be managed.	Amend the text as follows: In contrast the majority of land within the Development Area is currently undeveloped and therefore future development should be managed to ensure high quality urban design outcomes which mitigate adverse effects on the state highway and adjoining landowners outside of the Industrial Zone areas.
Waka Kotahi NZ Transport Agency	S112.166	DEV - Development Areas	DEV1-Overview and Purpose	Oppose in part	The DEV1 area will be accessed via three connections to the state highway, being the two existing local roads that flank the ends of the DEV1 area, as well as a new road access within the DEV1 area as shown on the Outline Development Plan for DEV 1. Waka Kotahi opposes the text in this section which suggests that additional access points onto the State highway would be considered if they were justified by traffic demand and suggests that that text be removed. This section of State highway 1 has been declared a Limited Access Road pursuant to section 88 of the Government Roding Powers Act, and has therefore been identified as a section of the highway network where the number of accesses onto the highway are to be limited. Also, we note that the second sentence duplicates the first, and we suggested that this duplication be removed.	Amend as follows: The indicative road layout seeks to allow for staged development and minimise additional access points onto the State Highway ~~unless they are justified by traffic demand.~~ It is anticipated that the Development Area will be developed in a staged manner which aligns with the future use of the racecourse and other landowner's aspirations. ~~The indicative road layout seeks to allow for staged development and minimise additional access points onto the State Highway unless they are justified by traffic demand.~~
Waka Kotahi NZ Transport Agency	S112.167	DEV - Development Areas	DEV1-O1	Support in part	As noted in in an earlier submission point, the section of State highway 1 adjacent to the DEV1 development area has been declared a Limited Access Road, and has therefore been identified as a section of the highway network where the number of accesses onto the highway are to be limited. We consider that the use of the term 'additional' in	Amend as follows: 1. connectivity of traffic, pedestrian and cycle routes provides for future development and minimises ~~additional~~ accesses onto the State Highway; and 8. the safe, efficient and effective operation of the surrounding roading environment, including the State highway network, is maintained.

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					clause (1) of this objective could be interpreted to mean there is a possibility of additional accesses from the DEV1 area onto the highway in addition to the single new access shown on the Outline Development Plan. We suggest that the objective be amended to clarify this matter. Recognising that the DEV1 area will be accessed from two local roads that connect to State Highway 1, Waka Kotahi also considers that the development of the DEV1 area should also ensure that the safe, efficient and effective operation of the state highway network is maintained and we recommend an additional clause be inserted into the objective to this end.	
Waka Kotahi NZ Transport Agency	S112.168	DEV - Development Areas	DEV1-P1	Support	Waka Kotahi supports this policy as it requires the subdivision and development of the DEV1 area to occur in accordance with the Outline Development Plan, unless an alternative design solution achieves the same or better outcomes.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.169	DEV - Development Areas	DEV1-P2	Support	Waka Kotahi supports this policy in part as it requires subdivision and development activities within the DEV1 area to be designed and located in accordance with the Outline Development Plan (ODP), and, in particular, for the development layout to align with the indicative road layout shown in the ODP and to avoid multiple connections onto the state highway. The indicative road location for the new access onto State highway 1, shown on the ODP as the 'Primary Road Connection', was identified through pre-notification consultation with Waka Kotahi.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.170	DEV - Development Areas	DEV-Additional provisions sought	Oppose in part	Development of the DEV1 area is expected to intensify the use of Racecourse Road and Saleyard Road, both of which connect to State Highway 1. Waka Kotahi seeks to ensure that the safe, efficient and effective operation of these local roadintersections with the highway are maintained and any necessary upgrades to these intersections are undertaken in a timely manner. We recommend a new policy be inserted into this chapter, to ensure that land use and development is required to maintain the safe, efficient and effective operation of the State highway network. This will ensure that any discretionary and non-complying resource consent applications are given due consideration as to the wider impact on key transportation networks.	Amend the policy as follow or words of similar effect: Ensure development is designed to be consistent with the capacity of the existing transportation network, including the State highway network, or will be appropriately upgraded.
Waka Kotahi NZ Transport Agency	S112.171	DEV - Development Areas	DEV1-R1	Support	Waka Kotahi supports this rule as it provides for new buildings and structures to be located within the DEV1 area in accordance with the DEV1 Outline Development Plan (ODP), as a permitted activity, provided they comply with the DEV1 standards, which includes standard DEV1-S2 managing	Retain as notified

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					internal roading formation within the DEV1 ODP area.	
Waka Kotahi NZ Transport Agency	S112.172	DEV - Development Areas	DEV1-S2	Oppose	Waka Kotahi consider that this standard does not provide sufficient information to understand the impacts of the development of the DEV1 area on the state highway network. In particular, what upgrades (including funding obligations) may be required to the intersections of Saleyard Road and State Highway 1 (SH1), and Racecourse Road and SH1, to accommodate the intensification in their use arising from development within the DEV1 area. We consider that this information needs to be provided through an Integrated Transport Assessment undertaken by a suitably experienced professional. Waka Kotahi opposes this standard until further information on the impacts on SH1 are provided and certainty is provided through Plan provisions about the triggers for intersection upgrades. Waka Kotahi considers that the provisions in other chapters, such as TRANS-R4 and SUB-R6, do not adequately provide for the assessment of the cumulative traffic effects, arising from the development of DEV1, on these State highway intersections. Nor do they include clear criteria for when these highway intersections should be upgraded to safely and efficiently accommodate the traffic generated by the development of the DEV1 area. Waka Kotahi suggests that this standard, and the associated Outline Development Plan, be amended to include clear requirements for the assessment of, and upgrade to, the intersection of Racecourse Road and State highway 1, as well as Saleyard Road and State highway 1, where those requirements have been informed by an Integrated Transport Assessment. We also recommend the amendment of the Matter of Discretion in (1) to clearly include the state highway intersection, as well as the inclusion of an advice note detailing the need for Waka Kotahi approval of any highway intersection upgrades. We support clause 2 in so far that it limits the number of road accesses from the site onto SH1 to only one, and requires existing vehicle crossings onto SH1 to be permanently closed prior to any new road access onto SH1 being used.	Include transport thresholds within DEV1-S2 and the associated DEV1 Outline Development Plan which specify when infrastructure upgrades are required at the intersection of Saleyard Road and State Highway 1, and at the intersection of Racecourse Road and State Highway 1. And amend the text of the Matters of Discretion, and add an Advice Note, as follows: Matters of Discretion: 1. The effects of traffic generation and the new road layout, including accesses onto Racecourse Road, Saleyard Road and State Highway 1, on the safe and efficient operation of the transport network including the State highway intersections . Advice Note: Waka Kotahi approval is required under the Government Rooding Powers Act (1989) for any upgrade to an existing local road intersection with the State Highway to ensure that it does not compromise the safety, efficiency and effectiveness of the state highway network.
Waka Kotahi NZ Transport Agency	S112.173	DEV - Development Areas	DEV1-ODP	Oppose in part	Waka Kotahi supports the layout of the Gore South ODP, in particular the location of the primary road connection with State highway 1 which achieves appropriate separation distances to adjacent existing local road intersections with State highway 1, as well as the provision of internal road connections through to the existing local roads, Saleyard Road and Racecourse Road, which supports good connectivity within the DEV1 area. However, Waka Kotahi suggests that this Outline	Amend the DEV1-ODP to include transport thresholds which specify when infrastructure upgrades are required at the intersection of Saleyard Road and State Highway 1, and at the intersection of Racecourse Road and State Highway 1.

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					Development Plan, be amended to include clear requirements for the assessment of, and upgrade to, the intersection of Racecourse Road and State highway 1, as well as Saleyard Road and State highway 1, where those requirements have been informed by an Integrated Transport Assessment.	
Waka Kotahi NZ Transport Agency	S112.174	DEV - Development Areas	DEV2-ODP	Support	Waka Kotahi supports this ODP as it provides for residential development in an appropriate location on the perimeter of existing residential areas in Gore, and because it provides a centralised neighbourhood centre zone that will reduce vehicle trips by residents to access services and employment, as well as providing road and cycling/pedestrian connectivity to existing adjacent developed areas.	Retain as notified
Waka Kotahi NZ Transport Agency	S112.175	NZTA - New Zealand Transport Agency	NZTA-1	Support in part	The inclusion of all the New Zealand Transport Agency state highway designations in the designation schedule is generally supported, subject to the correction of minor errors. Waka Kotahi generally supports the inclusion of NZTA-1 - NZTA-4, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier for each designation to remove the word 'Council' to be consistent with other state highway designations around the country	Amend wording of NZTA-1 - NZTA-4 to read: • 'State Highway 1 from the Clutha District ~~Council~~ boundary in the east to the Southland District ~~Council~~ boundary in the south' • 'State Highway 90 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the south' • 'State Highway 93 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the west' • 'State Highway 94 from the Southland District ~~Council~~ boundary in the north to the intersection with State Highway 1 in the south'
Waka Kotahi NZ Transport Agency	S112.176	NZTA - New Zealand Transport Agency	NZTA-2	Support in part	The inclusion of all the New Zealand Transport Agency state highway designations in the designation schedule is generally supported, subject to the correction of minor errors. Waka Kotahi generally supports the inclusion of NZTA-1 - NZTA-4, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier for each designation to remove the word 'Council' to be consistent with other state highway designations around the country	Amend wording of NZTA-1 - NZTA-4 to read: • 'State Highway 1 from the Clutha District ~~Council~~ boundary in the east to the Southland District ~~Council~~ boundary in the south' • 'State Highway 90 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the south' • 'State Highway 93 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the west' • 'State Highway 94 from the Southland District ~~Council~~ boundary in the north to the intersection with State Highway 1 in the south'
Waka Kotahi NZ Transport Agency	S112.177	NZTA - New Zealand Transport Agency	NZTA-3	Support in part	The inclusion of all the New Zealand Transport Agency state highway designations in the designation schedule is generally supported, subject to the correction of minor errors. Waka Kotahi generally supports the inclusion of NZTA-1 - NZTA-4, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier for each designation to remove the word 'Council' to be consistent with other state highway designations around the country	Amend wording of NZTA-1 - NZTA-4 to read: • 'State Highway 1 from the Clutha District ~~Council~~ boundary in the east to the Southland District ~~Council~~ boundary in the south' • 'State Highway 90 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the south' • 'State Highway 93 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the west' • 'State Highway 94 from the Southland District ~~Council~~ boundary in the north to the intersection with State Highway 1 in the south'
Waka Kotahi NZ Transport Agency	S112.178	NZTA - New Zealand Transport Agency	NZTA-4	Support in part	The inclusion of all the New Zealand Transport Agency state highway designations in the designation schedule is generally supported, subject to the correction of minor errors. Waka Kotahi generally supports the inclusion of NZTA-1 - NZTA-4, however for clarity and consistency it is	Amend wording of NZTA-1 - NZTA-4 to read: • 'State Highway 1 from the Clutha District ~~Council~~ boundary in the east to the Southland District ~~Council~~ boundary in the south' • 'State Highway 90 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the south' • 'State Highway 93 from the Clutha District ~~Council~~ boundary in the east to the intersection with State Highway 1 in the west' • 'State Highway

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					recommended to make a minor amendment to the wording of the Site Identifier for each designation to remove the word 'Council' to be consistent with other state highway designations around the country	94 from the Southland District Council boundary in the north to the intersection with State Highway 1 in the south'
Waka Kotahi NZ Transport Agency	S112.179	NZTA - New Zealand Transport Agency	NZTA-5	Support in part	Waka Kotahi generally supports the inclusion of NZTA-5, however notes that the Site Identifier needs to be corrected to reflect the actual extent of State Highway 96. In addition, for clarity and consistency, it is recommended to amend the wording of the Site Identifier to remove the word 'Council' to be consistent with other state highway designations around the country.	Amend wording to read: ~~'State Highway 96 from the Clutha District Council boundary in the east to the intersection with State Highway 1 in the west'~~ 'State Highway 96 from the intersection with State Highway 1 in the east to the Southland District boundary in the west'
Waka Kotahi NZ Transport Agency	S112.180	Designations map layers	NZTA Map - general	Support in part	Waka Kotahi supports the inclusion of state highway designations on the planning maps; however, several sections of the notified state highway designations need to be spatially represented accurately on the planning maps. Refer to Appendix 4 for examples of where the state highway designation boundaries will need to be corrected to align with the most current legal road boundaries and where the proposed designation will need to be widened to cover the formed and operational road. Full rationale in submission on page 71-73	Waka Kotahi requests that: • the state highway designation geospatial shapefiles be widened in discrete places to cover the formed and operational road; and • that the state highway designation geospatial shapefiles be corrected to align with the most up to date legal road boundaries. Refer Appendix 4 of the submission for examples of where the state highway designation boundaries will need to be corrected to align with the most current legal road parcel boundaries. Waka Kotahi will provide Council with the corrected geospatial files in due course.
Waka Kotahi NZ Transport Agency	S112.181	Appendix 1 - TRANS-APP - Transport Standard Construction Drawings	APP1-TRANS-APP	Support in part	R09-1 shows the 'private rural access' design. Waka Kotahi notes that this drawing does not meet the required Waka Kotahi minimum design for accesses (Diagram C; Attached as Appendix 5). Therefore, we consider that either this drawing should be updated to the Diagram C Standard, or alternatively that it is noted on the drawing that this access design excludes access to a State highway.	Either update the drawing to reflect Waka Kotahi minimum standard, Diagram C, or add a note to Drawing R09-1 clarifying this design is not applicable for an access to a State highway and that, instead, consultation is required to be undertaken with Waka Kotahi as the Road Controlling Authority for State highways
Waka Kotahi NZ Transport Agency	S112.182	Appendix 1 - TRANS-APP - Transport Standard Construction Drawings	APP1-TRANS-APP	Support in part	Waka Kotahi considers that Drawing R09-2 shows a nonstandard drawing for a Primary Commercial Access. If on a highway in a rural area Waka Kotahi would recommend a Diagram E standard for a Primary Commercial Access (refer to Diagram E in Appendix 1). Waka Kotahi suggest that the drawing should reflect this is not a standard for an access onto the highway.	Either update drawing R09-2 to reflect that a Primary Commercial Access onto a state highway in a rural area would need to meet the Waka Kotahi Diagram E standard or add a note to Drawing R09-2 clarifying this design is not applicable to an access to a State highway in a rural area and that, instead, consultation is required to be undertaken with Waka Kotahi as the Road Controlling Authority for State highways
Waka Kotahi NZ Transport Agency	S112.183	Appendix 1 - TRANS-APP - Transport Standard Construction Drawings	APP1-TRANS-APP	Support in part	Drawing R09-3, 'Rural Milk tanker Access', depicts what was a Waka Kotahi Diagram D standard, that was used for milk tankers and other heavy vehicles using a rural access. A Diagram D standard is no longer used for safety reasons and has now been replaced with a Diagram E access standard. Waka Kotahi suggest amendments are made to this drawing to reflect the aforementioned change to the Diagram E standard.	Either replace R09-3 with the Waka Kotahi Diagram E standard or add a note to Drawing R09-3 clarifying this design is not applicable to an access to a State highway and that, instead, consultation is required to be undertaken with Waka Kotahi as the Road Controlling Authority for State highways.
Waka Kotahi NZ Transport Agency	S112.184	Appendix 5 - NFL-APP -	APP5-NFL-APP	Support in part	The title/heading of Appendix 5 refers to only "ONL-APP" yet Appendix 5 identifies, in addition to the "Hokonui/Waterfall Range ONL", the "Mata-	Reassess for accuracy and amend the Appendix 5 text to accurately identify and name the specific outstanding natural features and landscapes within the Gore District, and make any necessary consequential changes to the 'Natural Features and Landscapes' map and

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		Landscape Values			Ura / Mataura River High Natural Character Feature (HNCF)" as well as the "Te Au Nui Pihapiha Kanakana / Mataura Falls ONF". Given that Appendix 5 identifies more than just an 'ONL', we suggest that the title of the appendix be amended to include all of the landscape values included. Moreover, none of the objectives, policies or rules in the associated NFL chapter, nor the associated Natural Features and Landscapes Map, refer to the Mataura River 'High Natural Character Feature' (HNCF). We suggest that either the reference to the Mataura River HNCF in Appendix 5 needs to be amended or deleted, or alternatively, that the provisions within the NFL chapter and map need to be amended to also refer to this HNCF.	provisions in the NFL chapter
Waka Kotahi NZ Transport Agency	S112.185	Natural environmental Values map layers	NFL-MAP-Mataura Falls	Support in part	The 'Natural Features and Landscapes' map shows the "Mataura Falls ONF" crossing State highway 93 (SH93) at a location approximately 270 metres southwest of the intersection of Eden Street and SH93. It is unclear from viewing street view imagery where the Mataura ONF is physically located at the point that it crosses SH93, as the land surface in this location appears highly modified, comprising buildings and hardstanding areas along both sides of the SH93 carriageway. It is unclear whether this is a mapping error or not. The image and description of the Mataura Falls ONF in Appendix 5 indicate that it is physically separated from SH93, and located "just north of the State Highway 93 bridge". We recommend that the accuracy of the map overlay is re-checked and any necessary corrections are made, especially as they relate to where it is presently shown to transect State highway 93.	Check the accuracy of the location of the "Mataura ONF" as shown on the map, and in particular, where it is shown to transect State highway 93 and correct any inaccuracies in the notified map as necessary
Waka Kotahi NZ Transport Agency	S112.186	General District Wide Matters map layers	NOISE-MAP-State Highway Noise Control Overlay	Support in part	Waka Kotahi seeks to introduce a new modelled 'State Highway Noise Control Overlay' to the Plan, to replace the 'State highway Noise Control Overlay' displayed in the Noise Map within the Plan, where the latter shows a standard/metric 40 metre buffer distance along the entire state highway network within the Gore district. Waka Kotahi has undertaken modelling to determine more accurately the distance that noise from the state highway transmits beyond the state highway road corridor. Our proposed overlay displays the outcome of this modelling, and it shows that the noise buffer area varies across the state highway network, influenced by variables such as land topography, barriers to noise created by existing buildings and structures, the surface material used to construct the highway carriageway and speed of vehicles, and traffic volumes. We consider that the 40m buffer area shown on the State Highway Noise Overlay map in the notified plan does not capture the full spatial extent of noise emissions	Replace the State highway noise control overlay in the notified Plan with the State highway noise control overlay provided by Waka Kotahi. Waka Kotahi will provide Council with the noise overlay geospatial files in due course.

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					from the designated state highway network; particularly within the Rural zones adjacent to State highway 1 and State Highway 94 where the effects of statehighway noise have been modelled out to 100 metres (a capped distance). There is generally a greater degree of consistency between the notified noise overlay and the overlay proposed by Waka Kotahi in the urban areas within the District and the rural areas adjoining State highways 90, 93 and 96, although there are still locations where quite marked variations in the width of the noise overlays occurs. Consequently, Waka Kotahi considers that, if the notified State Highway Noise Overlay map is relied upon, noise sensitive activities that might establish on those properties would not be adequately protected from noise arising from the state highway network through rule NOISE-R7 and associated standard NOISE-S3. Appendix 6 of this submission provides examples of where the notified Plan's proposed State Highway Noise Control Overlay covers a narrower area than the modelled State Highway Noise Control Overlay proposed by Waka Kotahi. To support the management of noise effects through an overlay approach, Waka Kotahi has produced a s32 report (see Appendix 3). A link to our recommended 'State highway Noise Control Overlay' map is available here: https://experience.arcgis.com/experience/dc12cf05d0d5477f8b042a8541bcb29	
Waka Kotahi NZ Transport Agency	S112.187	Energy, Infrastructure and Transport map layers	TRANS-MAP-Street Category	Support in part	Waka Kotahi notes that the Street categories shown on the One Network Framework (ONF) street category Map do not include all of the categories listed in the definition of 'street categories' in the Interpretation chapter of the Plan. It is unclear whether this is deliberate or an oversight.	Re-assess whether the ONF Street category map should include all of the 'street categories' listed in the definition in the Interpretation chapter and amend the map Legend and map accordingly to correct any omissions.
Waka Kotahi NZ Transport Agency	S112.189	NOISE - Noise	NOISE-R2	Support in part	In general Waka Kotahi supports this rule as it provides a permitted activity status for vibration from construction activities where specified building damage limits and amenity limits are met and cites appropriate vibration standards and limits. However, we consider that the location of the measurement of the amenity limits should not be restricted to the nearest corner of the floor of a habitable room within a building used for a noise sensitive activity, but instead should be changed to relate to where people might experience the adverse effect, which is potentially any location within the habitable room.	Amend clause 1(b) of the rule as follows, or words of similar intent: (b) Amenity limits - the limits in the table below when measured at any point on-in the nearest corner of the floor of a habitable room within a building used for a any-storey within a multi-storey building , or within 500mm of ground level at the foundation of a single storey building containing any noise sensitive activity that is occupied during the construction activity.
Waka Kotahi NZ Transport Agency	S112.190	DEV - Development Areas	DEV1-R1	Support	Waka Kotahi supports this rule as it provides for new buildings and structures to be located within the DEV1 area in accordance with	Retain as notified

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					the DEV1 Outline Development Plan (ODP), as a permitted activity, provided they comply with the DEV1 standards, which includes standard DEV1-S2 managing internal roading formation within the DEV1 ODP area.	
Webblin Agriculture Limited	S54.002	Zone map layers	GIZ-MAP	Support	Fully support the rezoning of the industrial area, as there is a large shortage of suitable land within the Gore district.	Fully support the rezoning of the industrial area, as there is a large shortage of suitable land within the Gore district
Woolworths New Zealand Limited	S97.001	Zone map layers	TCZ-MAP	Support	The submitter supports the Town Centre Zone at 24 Medway Street and the surrounding area.	Retain as notified.
Woolworths New Zealand Limited	S97.002	TCZ - Town Centre Zone	TCZ-R1	Support	The submitter supports supermarkets being a permitted activity.	Retain as notified.
Woolworths New Zealand Limited	S97.003	LCZ - Local Centre Zone	LCZ-R1	Support	The submitter supports supermarkets being a permitted activity.	Retain as notified.
Woolworths New Zealand Limited	S97.004	NCZ - Neighbourhood Centres Zone	NCZ-R1	Support	The submitter supports supermarkets being a permitted activity.	Retain as notified.
Yrless	S149.001	HH - Historical Heritage	HH-SCHED2-HH-2	Oppose	HH-SCHED2 does not deliver on the proposed objectives HH-O1 to O3. Terms such as "entire external envelope" are too generic in application.	Amend the schedule to only include heritage buildings and structures that have comprehensive and credible heritage reports and consultation with the community. Elements of the building, structure or site that requires heritage protection. Remove terms such as "entire external envelope".
Yrless	S149.002	INFR - Infrastructure	INFR-O1	Support		Retain as notified.
Yrless	S149.003	INFR - Infrastructure	INFR-O3	Support		Retain as notified.
Yrless	S149.004	INFR - Infrastructure	INFR-O4	Support		Retain as notified.
Yrless	S149.005	INFR - Infrastructure	INFR-O2	Amend	The provisions relating to infrastructure should be integrated into the plan instead of referring to and external document.	Delete ".. and provides for opportunities to link with future infrastructure in accordance with the Gore District Subdivision and Land Development Bylaw 2019 or any subsequent replacement document"
Yrless	S149.006	INFR - Infrastructure	INFR-P1	Support		Retain as notified.
Yrless	S149.007	INFR - Infrastructure	INFR-P6	Support		Retain as notified.
Yrless	S149.008	INFR - Infrastructure	INFR-P7	Support		Retain as notified.
Yrless	S149.009	INFR - Infrastructure	INFR-P3	Neutral		-
Yrless	S149.010	INFR - Infrastructure	INFR-P4	Oppose in part	The policy needs to reflect that there can be technical limitations to co-location/sharing of infrastructure.	Amend Policy to recognise that technical limitations may prevent co-location and/or sharing of infrastructure.
Yrless	S149.011	INFR - Infrastructure	INFR-P5	Oppose in part	The policy needs to reflect that there can be technical limitations to co-location/sharing of infrastructure.	Amend policy to recognise that technical limitations may prevent co-location and/or sharing of infrastructure.
Yrless	S149.012	INFR - Infrastructure	INFR-P7	Support in part	Avoidance of cultural sites due to the sites historical use or local understanding can only be made with the appropriate information - this needs to be available at the earliest possible stage of prospective development.	Amend Policy so that Council has a role in ensuring that cultural sites are appropriately defined or identified and/or there is a recognised mechanism to work collaboratively with iwi.

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Yrless	S149.013	INFR - Infrastructure	INFR-R1	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.014	INFR - Infrastructure	INFR-R2	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend the rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.015	INFR - Infrastructure	INFR-R3	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend the rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.016	INFR - Infrastructure	INFR-R4	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.017	INFR - Infrastructure	INFR-R5	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.018	INFR - Infrastructure	INFR-R6	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.019	INFR - Infrastructure	INFR-R7	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.020	INFR - Infrastructure	INFR-R8	Oppose in part	The proposed plan lacks technical analysis of the effects of below and above ground activities, and rationale for rule making.	Amend rule to provide the same status for above ground activities as below ground activities.
Yrless	S149.021	INFR - Infrastructure	INFR-R9	Oppose	Effects of the activity cannot be fully anticipated. Where specific consideration has been given to infrastructure development and it deemed inappropriate due to the effects, this should be specified in the plan as non-complying or prohibited, otherwise should be at a lower level of control	Amend rule status to controlled activity or restricted activity at most.
Yrless	S149.022	INFR - Infrastructure	INFR-S1	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	Amend standard to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.
Yrless	S149.023	INFR - Infrastructure	INFR-S2	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	Amend to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.
Yrless	S149.024	INFR - Infrastructure	INFR-S3	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	Amend standard to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.
Yrless	S149.025	INFR - Infrastructure	INFR-S4	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	Amend standard to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.
Yrless	S149.026	INFR - Infrastructure	INFR-S5	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	Amend standard to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.
Yrless	S149.027	INFR - Infrastructure	INFR-S7	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility	Amend standard to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	
Yrless	S149.028	INFR - Infrastructure	INFR-S8	Oppose in part	There is no technical basis or justification for imposing building height or usage of utility buildings. These restrictions add a layer of unnecessary cost for infrastructure developers.	Amend standard to better reflect the height and occupational requirements for categories of infrastructure and the effects of their activities.
Yrless	S149.029	Zone map layers	Zone map layer - general	Oppose in part	The zoning introduced is too complex and of limited utility given the size of the district. Support future development zones but should be zoned for their future use now.	Amend Residential, Commercial, and Mixed Use zones to revert to a simple approach.
Yrless	S149.030	Residential zones	Residential Zones - General	Oppose	Too complex and limited utility	Simplify to 1 zone
Yrless	S149.031	Commercial and Mixed-Use zones	Commercial and Mixed Use Zones - General	Oppose	Too complex and limited utility	Reduce number of zones
Yrless	S149.032	Whole Plan	Whole Plan	Oppose in part	Expresses concern relating to uncertainty of RMA reform, the integrity of the process and lack of consultation. Integrating the Gore District Subdivision and Land development Bylaw into the plan would provide a single place for the public to access information about development constraints, two approaches is confusing and not best practice. The zoning introduced is too complex and of limited utility given the size of the district. Support future development zones but should be zoned for their future use now.	Integrate the provision of the Gore District Subdivision and Land development Bylaw into the plan Amend Residential, Commercial, and Mixed-Use zones to revert to a simple approach with lesser number of zones.