

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Stoney Creek Station Limited	S3.114	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Stoney Creek Station Limited	S3.117	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 are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Susan Coulman	S4.001	Whole Plan	Whole Plan	Not Stated	There is a current need for facilitating smaller footprint dwellings and the district plan can allow for and encourage these. It is one of the pillars of future home ownership. The now elderly, baby boom generation are for the most part downsizing their accommodation as they plan for the years ahead. The single dwelling on a large section is an outdated model, the future trend is towards better designed compact living.	Allow for more than one dwelling on a property where there is servicing infrastructure either on-site or off-site. Allow for caravans and motorhomes without self-containment certification. Reduce the amount of space required to subdivide properties.
Reaby Downs Farm Ltd	S18.116	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023

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Reaby Downs Farm Ltd	S18.119	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Karen Temple	S19.116	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Karen Temple	S19.119	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Sarah and Peter Barclay	S20.116	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Sarah and Peter Barclay	S20.119	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to	Amend as per submission.

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					significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	
Helen McIntosh	S24.116	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Helen McIntosh	S24.119	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Adrienne Crispin	S59.002	Whole Plan	Whole Plan	Oppose	The Council and Government seem to be eroding our rights more and more with unworkable regulations, they should listen to the people more.	Less rules and restrictions
Ronald Crispin	S60.178	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Ronald Crispin	S60.182	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through

SUMMARY OF SUBMISSIONS

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					pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	another means such as a financial contributions policy.
Ronald Crispin	S60.183	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Ronald Crispin	S60.184	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being
Groundswell NZ	S66.001	Whole Plan	Whole Plan	Oppose in part	Groundswell NZ voices concerns about private land classifications under the RMA, including Significant Natural Areas, Natural Features and Landscapes, Sites of Significance to Maori, cultural landscapes and cultural sites, wetlands and riparian margins, citing stress and financial hardships for property owners. They critique RMA's treatment of natural and cultural values, advocate for integrated policies, and oppose the Gore District Council's proposal to classify the entire district. Groundswell NZ aims to collaborate with governments to address issues and emphasizes property owner support in policy development. They highlight the negative impact of RMA zoning, arguing for fairer processes. Groundswell NZ anticipates significant modifications to environmental legislation under the new government, aiming to enhance respect for private property rights. Refer to original submission for full details	Pause the Gore District Plan until the failings of the RMA have been addressed and clarity around the NPS-IB and the RMA replacement the NBA.
Groundswell NZ	S66.002	Whole Plan	Whole Plan	Oppose in part	Groundswell NZ voices concerns about private land classifications under the RMA, including Significant Natural Areas, Natural Features and Landscapes, Sites of Significance to Maori, cultural landscapes and cultural sites, wetlands and riparian margins, citing stress and financial hardships for property owners. They critique RMA's treatment of natural and cultural values, advocate for integrated policies, and oppose the Gore District Council's proposal to classify the entire district. Groundswell NZ aims to collaborate with governments to address issues and emphasizes property owner support in policy development. They highlight the negative impact of RMA zoning, arguing for fairer processes. Groundswell NZ anticipates significant modifications to environmental legislation under the new government, aiming to enhance respect for private property rights. Refer to original submission for full details	If our submission for the Proposed Gore District Plan to be paused is not accepted, then our submission would be the sections relating to the RMA Section 6 zoning issues outlined in full submission paused. Failing that submission our third preference and submission would be for all Section 6 zonings, policies and related rules be removed altogether for failing to meet the purpose of the RMA. This includes the new SASM classification and policies. We submit natural, historic, and cultural values be protected through an alternative mechanism that is outcomes focused and supports and empowers property owners, rather than penalizing them. One alternative option is a non-stutory plan that sits outside the formal plan but is referenced as meeting the Council's RMA requirements, including Section 6. Groundswell NZ are promoting an environmental policy approach based on integrated and holistic outcomes and actions focused framework in a manner that addresses the environmental issues relevant to that property. A core component of this is advisors working in partnership with property owners to identify key environmental risks, threats and opportunities, and an action plan based on the most urgent priorities tailored to each individual property owners

SUMMARY OF SUBMISSIONS

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						resources.
John Baynes	S68.001	Whole Plan	Whole Plan	Oppose	Has read the submission and supports it in full, considers it more efficient to support it than writing own submission.	Supports the Stoney Creek Station LTD submission verbatim.
John Baynes	S68.002	Whole Plan	Whole Plan	Oppose in part	Farming is a complex activity, often misunderstood by those creating governing rules. Federated Farmers of New Zealand, with a strong track record in political involvement, are well-equipped to offer expert advice to the council. As a crucial industry for the district's financial well-being, they are attuned to agricultural changes and improvements. The organisation's structure and finances grant access to a wide range of experienced agricultural experts, thus should be consulted on the PGDP in a formal sense.	Council adopts content of the Federated Farmers of New Zealand Submission as expert advice.
John Baynes	S68.003	Whole Plan	Whole Plan	Oppose in part	The plan will directly affect the farming activities of the district, and because of the industry importance to the economic, community and overall wellbeing, the input of Federated Farmers must be taken very seriously. Ignoring their advice will result in impractical regulation and severe financial loss to the district.	Support the Federated Farmers of New Zealand submission.
John Baynes	S68.004	Whole Plan	Whole Plan	Oppose in part	The District Plan is a comprehensive document governing various aspects within the district, which may unintentionally contain errors or adverse effects. Recognising the potential permanence of the plan, there should be a mechanism for the council to address and modify identified conditions that require adjustment.	Include a mechanism/ process allowing Councils to review (if seen fit) to alter a clause within the plan.
John Baynes	S68.118	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
John Baynes	S68.121	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.

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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
John Baynes	S68.296	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
John Baynes	S68.300	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
John Baynes	S68.301	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
John Baynes	S68.302	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being
Ian Davidson-Watts	S69.008	Whole Plan	Whole Plan	Not Stated	The District Plan is a valuable tool to provide for well planned and executed growth and development in a sustainable way. Supports the overall objectives and policies of the plan that values important natural and cultural assets and manages development. Concerned at the current lack of development contributions policy. New development without financial contributions places extra burden on existing ratepayers for maintaining and improving infrastructure.	Not stated Develop a development contribution policy to sit alongside the District Plan.
Environment Southland	S85.001	Whole Plan	Whole Plan	Not Stated	Exotic wilding tree species have the potential to cause widespread adverse ecological, amenity, economic and cultural effects. Establish a new chapter similar to chapter 34 of the QLDC PDP. Douglas Fir and other wilding species outlined in the QLDC chapter should be prohibited from being planted in the Gore District	Establish a new "wilding exotic trees" section of the district plan similar to chapter 34 of the QLDC Proposed District Plan

SUMMARY OF SUBMISSIONS

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Clark Fortune McDonald & Associates	S99.027	Whole Plan	Whole Plan	Not Stated	A majority of the zone chapters have rules stating that "any activities not listed" are non-complying activities. This is rather severe and a significant change in approach from the ODP, which provides that: 4.2.4 Any land use activity that: does not comply with Rule 4.2.1 or Rule 4.2.2 and is not otherwise explicitly provided for as a permitted, controlled, discretionary, non-complying or prohibited activity by any other rule in this Plan is a discretionary activity. It is questionable, whether every reasonable possibility has been sufficiently explored to classify all other activities non-complying by default. The ODP approach is considered to be far more practical in this regard.	Amend those rules stating that "any activities not listed" are non-complying activities to be discretionaryactivities.
Transpower New Zealand Limited	S101.103	Whole Plan	Whole Plan	Support in part	The specific provisions of the proposal that transpowers submission relates to are: The PDP in its entirety insofar as it relates to the National Grid, and particularly the extent to which the provisions of the PDP give effect to the NPS on Electricity Transmission 2008. The specific details of Transpowers submission, and decisions sought in relation to the PDP are set out in Appendix A of the submission. It is Transpower's submission that the Proposed District Plan goes a long way to achieving the statutory requirement set out above but that further amendments to the Proposed District Plan are required to: (a) give effect to the NPSET; (b) give effect to the SRPS; (c) appropriately reflect the relationship of the provisions of the Proposed District Plan with the NESETA; (d) achieve the purpose of the RMA; (e) represent the most appropriate means of exercising Council's functions having regard to the efficiency and effectiveness of the provisions relative to other means; and (f) discharge Council's duty under section 32 of the RMA.	Support in part the PDP as it relates to the National Grid
McNabb Management Ltd	S103.031	Whole Plan	Whole Plan	Support in part	I support all provisions in the proposed plan as notified except for the amendments requested to the above provisions, which are set out in the schedule and concept plan which are attached to and form part of this submission. I support all provisions in the proposed plan as notified except for the amendments requested to the above provisions, which are set out in the schedule and concept plan which are attached to and form part of this submission. The requested amendments to the proposed plan in this submission: • Achieve the purpose of the Resource Management Act 1991; • Are the most appropriate option under s32 of the RMA;	Support in part except requested amendents

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					• Give effect to relevant national planning documents including the National Policy Statement for Freshwater Management 2020; the National Policy Statement for Highly Productive Land 2022; and the National Policy Statement for Indigenous Biodiversity 2023; • Give effect to the Regional Policy Statement for Southland; • Are consistent with the relevant regional plan on matters which are primarily the control of the regional council; • Take into account relevant planning documents recognised by the iwi authority; • Have regard to strategies and plans prepared by the Council under other legislation; and • In the case of requested amendments to policies or methods, including rules, the amendments achieve the objectives of the proposed plan or implement the policies in accordance with s75(1) of the RMA.	
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	S113.117	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 are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Kevin Robertson	S115.001	Whole Plan	Whole Plan	Not Stated	Practical and common-sense ideas are needed to achieve successful outcomes	Supports Federated Farmers Submission
Kevin Robertson	S115.176	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-

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					are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	to-day primary production activities.
Kevin Robertson	S115.180	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Kevin Robertson	S115.181	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Kevin Robertson	S115.182	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being
Nathan Bokser	S116.114	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
Nathan Bokser	S116.117	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 are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.

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AW+ JA Johnston Family Trust	S118.114	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
AW+ JA Johnston Family Trust	S118.117	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 are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Heritage New Zealand Pouhere Taonga	S123.020	Whole Plan	Whole Plan	Amend	Recommend including a hyperlink to the Heritage New Zealand Pouhere Taonga Act 2014 (the Act) online where the Act is referred to, as has been added on page 183, throughout the GDP. A link to the Act would allow plan users ease of access	Add Heritage New Zealand Pouhere Taonga Act 2014 hyperlink

SUMMARY OF SUBMISSIONS

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					and create awareness of the purpose and provisions of the Act, including any landowner responsibilities under the archaeological provisions.	
Heritage New Zealand Pouhere Taonga	S123.029	Whole Plan	Whole Plan	Not Stated	HNZPT advocates for robust provisions to be established to ensure that residential intensification will not be at the expense of Gore's historic heritage. The construction of a greater number, and potentially taller buildings close to a heritage structure could result in its heritage values being put at risk. This includes issues associated with construction, such as vibration, and potential long-term conservation and liveability problems associated with loss of sunlight, overshadowing and damp. Although development on the site of the heritage item may still be subject to resource consent requirements, permitted development on an adjacent property may have as detrimental an effect.	Consideration of the appropriateness of increased residential development should go beyond consistency with the area's anticipated character and amenity values. Measures such as increased setbacks or reduced heights may assist in mitigating adverse effects on a neighbouring heritage item. HNZPT recommends that appropriate standards are applied to sites adjoining a scheduled historic heritage item or area under the District Plan, as historic heritage is a section 6 matter and also a qualifying matter under the NPS-UD.
Southland Federated Farmers of New Zealand	S126.175	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Southland Federated Farmers of New Zealand	S126.179	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Southland Federated Farmers of New Zealand	S126.180	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Southland Federated Farmers of New Zealand	S126.181	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being
Peters Farm LtdKaren Peters	S127.150	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	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023

SUMMARY OF SUBMISSIONS

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					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.	
Peters Farm Ltd Karen Peters	S127.153	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Andrea McMillan & Tony Harpur	S134.013	Whole Plan	Whole Plan	Oppose in part		that all matters in the PDP relating to the WTP and buffer (and any ancillary matters) are withdrawn from the PDP; all associated objectives, policies and rules that relate WTPs and buffers are amended to reflect their removal, including:
Jenny Campbell	S136.001	Whole Plan	Whole Plan	Not Stated		All environmental decisions made in consultation with Tangata Whenua
Jenny Campbell	S136.002	Whole Plan	Whole Plan	Not Stated		All environmental decisions be nature based solutions
Jenny Campbell	S136.003	Whole Plan	Whole Plan	Not Stated		Every environmental decision and policy be made and viewed through a Climate Change lens.
Jenny Campbell	S136.004	Whole Plan	Whole Plan	Not Stated	This improves the health of people & in particular old & people who are more susceptible to lung and breathing impacts from polluted air.	No new mines, no previous mines being re- opened
Jenny Campbell	S136.005	Whole Plan	Whole Plan	Not Stated		Restore habitat for all, native species which are often on the endangered list. These cover native plants which are in turn habitats for our endangered invertebrates, birds and fish
Jenny Campbell	S136.011	Whole Plan	Whole Plan	Not Stated	Tend to produce wildings over adjacent native forest & farm land	Planting of exotics must not be given resource consent. e.g., Pinus contorta, Pinus - other species, firs, eucalypts. Decrease the number of pine plantings & strictly adhere to banning planting on steep slopes as well as requiring each company to chip all waste & slash at each logging site. Instead encourage planting of natives encouraging diversity of species.
Jenny Campbell	S136.013	Whole Plan	Whole Plan	Not Stated		Towns need upgraded infrastructure to ensure drains are up to standard to prevent discharges of sewage in to the environment & rivers in

SUMMARY OF SUBMISSIONS

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						particular.
Jenny Campbell	S136.022	Whole Plan	Whole Plan	Not Stated		Vegetation clearance needs to be done under rules eg exotic forests.
Jenny Campbell	S136.023	Whole Plan	Whole Plan	Not Stated		All new developments eg for housing, transport and industry need to be in appropriate places eg not close to rivers or other large water areas or run- off areas eg on steep slopes, by lakes, on drained wetlands, near estuaries.
Hugh Gardyne	S137.001	Whole Plan	Whole Plan	Oppose	There is no benefit for council to continue this work until the government is clear on RMA reforms and the consequential regulation required by Councils.	Delete Chapter 2 - Matters of National Significance (reference to Operative Plan) until new government decides on RMA reforms. Seeks a resolution of Council to write to the Minister of RMA reform to seek guidance on the time of revised legislation.
Port Blakely Limited	S138.007	Whole Plan	Whole Plan	Not Stated		That the Proposed Plan be rejected in its current form;
Port Blakely Limited	S138.008	Whole Plan	Whole Plan	Not Stated		That the Proposed Plan be amended to reflect the issues raised in this submission;
Port Blakely Limited	S138.009	Whole Plan	Whole Plan	Not Stated		That the Proposed Plan be amended to incorporate the equivalent regulation of the NES-CF or otherwise amend or delete the rule so that the equivalent NES-CF regulation applies instead of the Proposed Plan rule;
Port Blakely Limited	S138.010	Whole Plan	Whole Plan	Not Stated		That the relevant Proposed Plan objectives and policies be amended as required to support and implement the particular relief described above; and/or
Port Blakely Limited	S138.011	Whole Plan	Whole Plan	Not Stated		Such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to the Proposed Plan that address the matters raised by Port Blakely.
Hokonui Rūnanga Inc	S139.039	Whole Plan	Whole Plan	Oppose in part	Mana whenua elected not to identify 'sites of cultural significance' in the plan because mana whenua have an enduring relationship with all of the District. All whenua and wai has whakapapa, history, mauri and meaning for mana whenua. Identifying sites as culturally significant implies other areas are not. Mana whenua determine which land uses may be appropriate in any situation considering matters such as whakapapa, natural capital, relationship with other areas in a broader cultural landscape, past and current land uses, mauri of the area and effects of the proposed activity on mauri. However, there are some policies in the plan that refer to the effects of activities on 'Sites of Cultural Significance.'	Delete all references to 'sites of cultural significance' and replace with ' or significant effects on the values mana whenua associate with the area '. Work with Hokonui Rūnanga Inc on a variation and guidance from a mana whenua perspective.
Hokonui Rūnanga Inc	S139.040	Whole Plan	Whole Plan	Oppose in part	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are	Amend references to 'Ngā Tahu values' with more detailed description of particular effects to be avoided, remedied or mitigated.

SUMMARY OF SUBMISSIONS

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					identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	
Hokonui Rūnanga Inc	S139.091	Whole Plan	Whole Plan	Amend	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Make consequential amendments to rules that refer to 'Ngai Tahu cultural values' by adding the words: "as identified in the objectives and policies for this zone and listed in MW2.3"
Hokonui Rūnanga Inc	S139.093	Whole Plan	Whole Plan	Support in part	Hokonui Rūnanga Inc supports all the provisions in the proposed plan as notified except for the amendments requested to the stated provisions, as set out in the submissions table and schedule and form part of the submission.	Retain provisions as notified, except for those which have been submitted against as part of Hokonui Runanga's submission
Robina Johnston	S140.014	Whole Plan	Whole Plan	Not Stated		Financial contributions should offset future costs in the specific location of the activity, further work needed on what is appropriate and consideration should be given of commercial vs non commercial activities. Payment should be in part at key steps.
Rural Ratepayers Group	S143.187	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Rural Ratepayers Group	S143.191	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Rural Ratepayers Group	S143.192	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Rural Ratepayers Group	S143.193	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being

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Southland District Council	S146.001	Whole Plan	Whole Plan	Support in part	Southland District Council thanks Gore District Council for the opportunity to comment. SDC congratulates those involved for their excellent work. Southland District Council supports in part the proposed Gore District Plan, with some issues being discovered during review. No significant cross-boundary issues were identified, only possible differences in the NFL section were identified. The proposed District Plan will bring positive outcomes to Gore communities and the Southland region as a whole.	Specific decisions requested are described in the specific sections of this document.
New Zealand Defence Force	S147.026	Whole Plan	Whole Plan	Amend	Zone rules have a default non-complying activity status when it is not a specified activity. This is considered unnecessary, particularly where activities are of low scale and may have minor effects.	Address the default activity status of NC in the zone rules and amend to Discretionary.
Alistair & Bernadette Hunt	S148.188	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site'. 'The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Alistair & Bernadette Hunt	S148.192	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of 'growth pays for growth' is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be 'best practice' to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Alistair & Bernadette Hunt	S148.193	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both 'existing use rights' and 'lawfully established' to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Alistair & Bernadette Hunt	S148.194	Whole Plan	Whole Plan	Amend	Throughout the Plan, 'well-being' is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as 'well-being'. The Plan should align with the legislation.	Change wellbeing to well-being
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	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.

SUMMARY OF SUBMISSIONS

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					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.	
Nigel Cowburn	S152.002	Whole Plan	Whole Plan	Not Stated		The whole plans lacks any meaningful treatment of modern Best Management stormwater Practice e.g. Sustainable Drainage aka SuDS, LID, or Sponge City.
Nigel Cowburn	S152.011	Whole Plan	Whole Plan	Not Stated	Plan rules need to be prescriptive and to function needs to be able to survive a lowest tender build (comment in relation to permeability controls)	Forbid lowest tender acceptance and use NZTA's tender assessment criteria.
Nigel Cowburn	S152.017	Whole Plan	Whole Plan	Not Stated	The overview is more wordy than it needs to be, and makes it hard to read, in particular in relation to natural values. Riparian aspects are out of date. happy to see that plant species in flood control areas allows for the use of exotics as this is an engineering issue, and setting it to native only (as in some other jurisdictions) would impede successful design.	Variable width riparian should be emphasised through text as it would put the function where it needs to be (tends to be headwaters and gully heads) and free up productive land. Retain allowance for use of exotics in flood control areas
New Zealand Agricultural Aviation Association	S156.001	Whole Plan	Whole Plan	Oppose in part	S32 Report does not provide rationale and justification for the approach taken to the setback rules for agricultural aviation.	Amend provisions to ensure that they are justified in the s32 report