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Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					their properties efficiently and effectively. A 2 metre setback and requirement to comply with height recession planes in GIZ-S2 is considered to give sufficient setback from adjoining properties in a more sensitive zone without compromising the ability to operate in the GIZ. The effects of this rule can be clearly seen at 68 Charlton Road which has General Residential land bordering the site to the east and rural lifestyle zoned land bordering the site to the west.	
HWR Property Limited	S108.023	GIZ - General Industrial Zone	GIZ-S6	Support in part	Clarity around what is considered suitable minimum landscaping will help landowners make informed choices.	Amend to include minimum requirements min 1m height
HWR Property Limited	S108.024	GIZ - General Industrial Zone	GIZ-S9	Oppose	Industrial sites are generally fully sealed in order to operate efficiently and often due to a requirement to have outdoor storage, maneuvering areas for large vehicles and large buildings. A requirement to have 10% permeable surface is considered out of keeping with the intent for the General Industrial Zone and is opposed. The landscaping strip required along the site frontage (GIZ-S6) is considered sufficient to provide some measure of permeable surfaces on site.	Delete Provision
HWR Property Limited	S108.025	GIZ - General Industrial Zone	GIZ-S10	Oppose	The GIZ is anticipated to generate high levels of noise, odour, dust and other discharge effects. Sensitive activities such as dwellings, whether or not they are ancillary to an industrial activity are not considered appropriate in this zone and certainly outdoor living space within the GIZ is likely to experience high levels of sensitivity not in keeping with the intentions for the zone. This provision should be deleted even if the ability to establish ancillary residential activities is retained.	Delete provision

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Ian Davidson-Watts	S69.001	RLZ - Rural Lifestyle Zone	RLZ-PREC11-O1	Support in part	Support the objective and rules for protecting and sustainably managing this part of the district. Recent development has highlighted the need for proper management, in particular the impact on the road.	Recognises and protects the landscape values of the Hokonui Hills Rural Lifestyle Precinct and the nearby Hokonui Hills Outstanding Natural Landscape and Croydon Bush Scenic Reserve
Ian Davidson-Watts	S69.002	RLZ - Rural Lifestyle Zone	RLZ-S3	Oppose	Landform limits the ability to construct buildings within sections and in a number of cases having buildings within 40m is more desirable from a visual perspective. We recognise that there might be some differentiation between outbuildings and residential buildings, the latter being more problematic with dust etc.	As it relates to PREC11 - We propose that the rule is changed to residential buildings being set back a minimum of 40m and non-residential buildings being setback a minimum of 10m.
Ian Davidson-Watts	S69.003	RLZ - Rural Lifestyle Zone	RLZ-S11	Oppose in part	This is an arbitrary limit and each property will have different characteristics where a greater distance will still meet the needs of the relevant objective. Non-native species have their value to local wildlife (nesting and certain food sources) and fast-growing species can provide climatic shelter from which native stands of vegetation can become quickly established behind.	The rule should define curtilage and 'garden' including non-native species planting/landscaping is permitted within that curtilage.
Ian Davidson-Watts	S69.004	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Support in part	Considers that the number of consents applied for within existing SNAs to not be the best measure of effectiveness of the operative plan in the Section 32 report as these are scientific reserves. Biodiversity is critical to our communities economic, cultural, and social well-being. Natural capital (ecosystem services) can help in reducing flood events, improve water quality, and other ecosystem services such as pollination, soil health, and our general enjoyment of the outdoors which has so many physical and mental health benefits. SNAs in their own way are no different to someone have a heritage building in Gore Town and should be treated in the same way. The development of the NPS-IB (and whether it stays in force under the new Government) is irrelevant to GDCs responsibility to discharging their duties under S6c to indigenous fauna and vegetation, and if the new Government repeal this policy statement, the legal requirement to protect indigenous vegetation and fauna remains.	Agree with the proposed plan's approach to protect all indigenous vegetation until the SNA process is resolved. Identification of SNAs is completed ideally within 18 months of notification, engagement with affected landowners and full discussions about the value of their SNAs and the support they can receive can be undertaken. Recognition of those with the stewardship of these areas with rates relief, financial incentives and support, advice, management plan approach, free council consent process for agreed activities support, help for funding applications to assist with fencing, pest and weed control and work with local iwi.
Ian Davidson-Watts	S69.005	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose in part	Open scrub: May have ecological value for species and vegetation that benefit from disturbed areas (many invertebrates lay eggs on open ground sites amongst low level vegetation etc). These habitats are also quicker to reestablish and the process of reestablishment is of ecological value in its own right. Closed forest: retention of canopy linkage is often	More flexibility depending on the habitat in respect of the maintenance of established activities: Open scrub, and grassland: 3m of disturbance Closed forest: 1.5m of disturbance with a structure over 4m in height. <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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					the one of the most important ecological factors associated with these habitats.	
Ian Davidson-Watts	S69.006	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Not Stated	These species often use nonnative habitats for part, or all of their lifecycle and it is important that these are properly addressed in the provisions.	We seek clarification on what rules apply to the protection of highly mobile fauna (of rare or threatened species etc). The rules to protect them when they are identified should be similar to those of SNAs
Ian Davidson-Watts	S69.007	NFL - Natural Features and Landscapes	NFL - General	Support	We fully support the proposed objectives and rules for NATURAL FEATURES AND LANDSCAPES.	We fully support the proposed objectives and rules for NATURAL FEATURES AND LANDSCAPES.
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.
Isobel Agnew	S48.001	GDC - Gore District Council	GDC-10	Oppose	There will be financial impact on current landowners Restrictions on what landowners can do with their property Cost's associated with complying with requirements Council's position for the buffer zone to act as a mechanism to inform potential buyers of the water treatment plant- this is an excessive and blunt tool Financial compensation sought if buffer zone goes ahead Significant Mental Health impacts on current landowners	To drop the buffer zone around East Gore Water Treatment Plant
Isobel Agnew	S48.002	Zone map layers	Water Supply Treatment Facility Buffer Area	Oppose	There will be financial impact on current landowners Restrictions on what landowners can do with their property Cost's associated with complying with requirements Council's position for the buffer zone to act as a mechanism to inform potential buyers of the water treatment plant- this is an excessive and blunt tool Financial compensation sought if buffer zone goes ahead Significant Mental Health impacts on current landowners	To drop the buffer zone around East Gore Water Treatment Plant
Jacklyn (Jackie) Johnston	S50.001	SUB - Subdivision	SUB-P7	Support	We should utilise our natural resources, especially in times of water shortage. Water meters are an option but introduce ongoing costs without addressing the shortage issue during certain times of the year. Making rainwater capture and	Propose a mandatory inclusion of rainwater capture and greywater recycling in all new builds and alterations where it is practical, for example new roofing. With the possibility of subsidies. The Council could explore potential bulk contracts for tanks at reduced costs given the significant numbers.

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					greywater recycling a requirement in the consent process for new builds initiates a positive change. This is implemented in other places facing water scarcity, fostering a mindset of responsible water usage when individuals are collecting their own water.	
Jacklyn (Jackie) Johnston	S50.002	SUB - Subdivision	SUB-P13	Support in part	Productive rural land and high-value soils should be preserved.	Reconsider this provision as it is in conflict with SUB-S1 (h).
Jacklyn (Jackie) Johnston	S50.003	SUB - Subdivision	SUB-S1	Oppose	It would be better to protect this type of land by permitting the opposite. Some people may not have the ability or desire to manage 8ha sections. This could include those seeking a quarter-acre section for building, whether on their existing farm for retirement or due to health and financial considerations. The current rules, and potentially the new 8ha proposal, may hinder people who have spent their lives in rural communities but are unable to comply. Enabling subdivision of smaller sections would accommodate those desiring a rural lifestyle without the burden of excess land which people. There are suitable options for septic systems on the proposed minimum lot size. It's crucial to provide options, particularly for those within the rural community.	General Rural Zone: Minimum Lot size- 0.101ha
James Weir	S75.001	HH - Historical Heritage	HH-SCHED2-HH-83	Oppose	The building is a 1950's replacment of the original wooden building. The alterations were architecturally tasteful and able to be made without the extra cost of consenting- consulting with unrelated third parties. The additional cost may make it too expensive in future to continue maintenance of building. As an effect, some building may be abandoned or unused at the community's loss. The value of the property would be compromised if listed - there is evidence of reduced buyer interest because of heritage listing. The community can be trusted to make good decisions for the current and future use of the building without heritage status.	Otama Presbyterian Church building (HH-83) to be removed from the schedule as an historic building
Janice Wilson	S15.001	Zone map layers	Water Supply Treatment Facility Buffer Area	Oppose	The buffer zone will reduce the land value and there will be issues with noise from the treatment plant and increased costs. There has been a lack of consultation, we were never consulted on being included in the buffer zone. Also environmental concerns.	To remove the buffer zone east Gore water treatment plant.
Jenna Potter	S11.001	GDC - Gore District Council	GDC-10	Oppose	Concerned that the buffer zone will reduce value on the house/land. There has been a lack of consultation with regard to the proposed buffer zone. Concerned that environmental, noise and lights from the plant will also be an issue.	To drop the buffer zone for the water treatment plant in east Gore
Jenna Potter	S11.002	Zone map layers	Water Supply Treatment Facility Buffer Area	Oppose	Concerned that the buffer zone will reduce value on the house/land. There has been a lack of consultation with regard to the proposed buffer	To drop the buffer zone for the water treatment plant in east Gore

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					zone. Concerned that environmental, noise and lights from the plant will also be an issue.	
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	S136.007	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Not Stated	SNAs are as essential part of our environment and Native Biodiversity is our first consideration in responding to our current Climate Change and should take precedence.	Significant Natural Areas should be retained above all other considerations e.g., possible buildings.
Jenny Campbell	S136.008	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Not Stated		SNA's need to be identified & protected, with no grazing in them
Jenny Campbell	S136.009	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Not Stated		Ecological corridors in conjunction with SNA's are an imperative in order for organism to be able to travel along these eg between food sources & seasonally.
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 particular.
Jenny Campbell	S136.015	TREE - Notable Trees	TREE - General	Not Stated		Heritage tree register for both native & introduced species
Jenny Campbell	S136.016	NFL - Natural Features and Landscapes	NFL - General	Not Stated		Significant landscapes retained - having community engagement before any decisions are made
Jenny Campbell	S136.017	INFR - Infrastructure	INFR-Additional provisions sought	Not Stated		Water use- grey water systems be encouraged in both town & country and especially new houses & industrial buildings being made mandatory.
Jenny Campbell	S136.018	NFL - Natural Features and Landscapes	NFL - General	Not Stated		Ensure significant landscapes are retained with consultation with the local community & wider population, especially tangata whenua values , before making decisions
Jenny Campbell	S136.020	ENRG - Energy	ENRG - General	Not Stated		Renewable energy projects need to be in appropriate places with environmental effects emphasised.
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,

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						by lakes, on drained wetlands, near estuaries.
Jet Boating NZ	S64.001	ASW - Activities on the Surface of Water	ASW-Overview	Support	The submitter has a view that use and enjoyment of waterways shall be permitted and can be shared by various users/ organisations. Where circumstances exist for specific controls and the like, default permission for use and enjoyment may be modified accordingly. Modifications may include appropriate management of the waterways whilst still enabling shared use of the same	The submitter supports the wording of point 3 of overview.
Jet Boating NZ	S64.002	ASW - Activities on the Surface of Water	ASW-Overview	Amend	The submitter acknowledges that motorized activities have potential for minimal impact on the amenity of waterways and adjoining land but in comparison to the natural fluctuation in river the effects are negligible.	Suggested amendment to wording: Motorized activities do however have the potential to have minimal impact on the amenity of the waterways and adjoining land.
Jet Boating NZ	S64.003	ASW - Activities on the Surface of Water	ASW-Overview	Amend	The Environment Southland Navigation Safety Bylaw is reviewed every 5 years, and this will be within the term of the District Plan. Therefore, we suggest that the date on the Bylaw be removed and the word "operative" be added.	Amendment to wording: Discharges to water, taking and using water, and structures and bed disturbance activities in riverbeds may require resource consent approval from Environment Southland. The operative Navigation Safety Bylaws ~~2009~~ apply to the Gore district and is also administered by Environment Southland.
Jet Boating NZ	S64.004	ASW - Activities on the Surface of Water	ASW-O1	Support	The submitter supports ASW-O1 as it is enabling with respect to recreational activities. It also recognises the benefits of activities on the surface of water to individuals and the community.	Retain as proposed.
Jet Boating NZ	S64.005	ASW - Activities on the Surface of Water	ASW-O2	Amend	The objectives provide for iwi and cultural and spiritual association with waterways. It allows associated activities and rituals without unreasonable restriction by other activities. JBNZ supports the shared use and enjoyment of waterways. It does not support exclusive use except in exceptional circumstances where this level of management is warranted and agreed.	Amendment to wording. Mana whenua and tangata whenua are able to express their cultural relationships with the waterways and continue to practice various cultural activities or rituals without being unreasonably restricted by other activities and their associated facilities or structures, whilst also reasonably enabling shared use and enjoyment by others.
Jet Boating NZ	S64.006	ASW - Activities on the Surface of Water	ASW-P1	Support	The submitter supports ASW-P1 as it enables recreational jetboating activities and infers it can occur shared with others seeking recreational and cultural use and enjoyment.	Retain as proposed.
Jet Boating NZ	S64.007	ASW - Activities on the Surface of Water	ASW-P2	Amend	The policy prioritises the health and safety of specific users, where the submitter considers it equally important for all users of the waterway. Management and control of activities should reflect the specific circumstances of the waterway and activities. Hence classification of users is inappropriate and unnecessary.	Suggested amendment to wording. Prioritize the health and safety of those undertaking ~~non-commercial and non-motorized recreational and cultural~~ activities within waterbodies and their margins.
Jet Boating NZ	S64.008	ASW - Activities on the Surface of Water	ASW-P3	Amend	The submitter generally supports ASW-P3, however is concerned that some infrastructure and/or equipment may present as an unacceptable navigation hazard to waterway users.	Suggested amendment to wording. Enable the location of infrastructure and equipment used for monitoring or testing, where there is a functional need for this to be located on or above the surface of waterbodies and it does not create an unacceptable navigational hazard to waterway users.
Jet Boating NZ	S64.009	ASW - Activities on the Surface of Water	ASW-P6	Support	The submitter supports ASW-P6 and agrees to maintain a safe environment for surface of water activities, including the navigation of watercraft.	Retain as proposed.

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Jet Boating NZ	S64.010	ASW - Activities on the Surface of Water	ASW-R4	Support	The submitter supports ASW-R4.	Retain as proposed.
Jet Boating NZ	S64.011	ASW - Activities on the Surface of Water	ASW-R6	Support	This rule reflects the broad circumstances for an Existing Use Right and permits it. This is a pragmatic rule that is welcomed.	Retain as proposed.
Jet Boating NZ	S64.012	ASW - Activities on the Surface of Water	ASW-R7	Oppose	The submitter proposes that the surface of water activities in the PDP are consistent with adjacent District Plans, given the Mataura River flows In from Southland and out to Southland. The Southland District Council use the Environment Southland Navigation Safety Bylaw to manage surface of water activities.	Amend to: Sport and RecreationActivity Mataura River Activity Status:Permitted Where: 1. The activity does notutilise any motorisedwatercraft; or 2. The use ofmotorised watercraftcomplies with theOperativeEnvironmentSouthlandNavigation SafetyBylaw, the relevantRegional Plans inparticular forstructures in the bedsof rivers.
Jet Boating NZ	S64.013	NOISE - Noise	NOISE-P4	Support	Noise should be tolerated in circumstances where the level timing and duration is reasonable. Which is particularly the case for occasional and short duration noise.	Retain as proposed.
Jet Boating NZ	S64.014	NOISE - Noise	NOISE-Exemptions	Support	The submitter supports the exempt sources.	Retain as proposed, noting submitters point requesting noise related to JBNZ temporary events are exempt as well.
Jet Boating NZ	S64.015	NOISE - Noise	NOISE-Exemptions	Amend	An organised JBNZ activity may be considered a temporary activity and is therefore subject to R10 which is contradictory to the exempt noise sources. Noise from an organised JBNZ activity is no different to a motor craft operating. Hence, should be exempt from R10.	Amend the list ofnoise sources exemptfrom specific rules andstandards as follows.7. Motorcraft operatingon the surface ofwaterbodies includingorganized JBNZactivities that mayconstitute aTemporary Event.
Jet Boating NZ	S64.016	TEMP - Temporary Activities	TEMP-O1	Support	The submitter supports the TEMP-O1. The provision of organised recreational jet boating events - being events promoted and organised by the submitter. They can be controlled to reasonably mitigate adverse effects noting these effects will be of an occasional and short duration nature.	Retain as proposed.
Jet Boating NZ	S64.017	TEMP - Temporary Activities	TEMP-O2	Support	The submitter supports TEMP-O2 and recognises that JBNZ events will contribute to this.	Retain as proposed.
Jet Boating NZ	S64.018	TEMP - Temporary Activities	TEMP-P1	Support	The submitter supports this policy and notes that JBNZ events are compliant with this and should be enabled.	Retain as proposed.
Jet Boating NZ	S64.019	TEMP - Temporary Activities	TEMP-P4	Support	The submitter supports TEMP-P4 and notes that JBNZ events will be compliant with this policy.	Retain as proposed.
Jet Boating NZ	S64.020	TEMP - Temporary Activities	TEMP-R1	Support	The submitter supports TEMP-R1, and the controls are reasonable. The submitter notes that in terms of JBNZ this more applies to onshore activities including parking of boat trailers and towing vehicles etc.	Retain as proposed.
Jet Boating NZ	S64.021	NOSZ - Natural Open Space Zone	NOSZ-P1	Amend	Recreational activities that are potentially incompatible with the character, qualities and purposes of the zone should still be enabled albeit with suitable control and management to reasonably mitigate potential adverse effects.	Amend wording as follows. Enable recreational,sporting and community activities,limited commercialactivities and ruralactivities that arecompatible with thecharacter and amenityof the site andsurroundings, or ifpotentiallyincompatible can stillbe enabled albeitcontrolled

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						or managed to reasonably mitigate adverse effects.
Jet Boating NZ	S64.022	NOSZ - Natural Open Space Zone	NOSZ-P5	Amend	Activities that are potentially incompatible with the character, qualities and purposes of the zone need not be avoided and should be enabled with suitable control and management to reasonably mitigate potential adverse effects.	Amend wording as follows. ~~Avoid Activities~~ that are potentially incompatible with the character, qualities and purpose of the Natural Open Space Zone are enabled albeit controlled and managed to mitigate adverse effects.
Jet Boating NZ	S64.023	NOSZ - Natural Open Space Zone	NOSZ-R2	Support	Recreational jet boating activities should be permitted activities.	Retain as proposed.
Jet Boating NZ	S64.024	SASM - Sites and Areas of Significance to Māori	SASM - General	Neutral	JBNZ holds the perspective that waterways should be shared and enjoyed responsibly, with appropriate controls and management to avoid adverse effects. The GDP should facilitate, not restrict, waterway activities, and potential impacts should be mitigated. As per the submitters interpretation of SASM, the submitter is mindful that recreational jet boating will come under the above given waters are considered SASM, this consideration is not opposed in principle. However, it emphasises fair and reasonable evaluation of its impact on specific Māori cultural and spiritual values relating to the specific waterway. The submitter has concern around engagement with mana whenua for all recreational jetboating activities, and in doing so being subject to the formality, effort and expense associated with any application for land use consent. Listing all land, water and natural features as SASM, this chapter and MW chapters appear to require full and formal involvement of mana whenua for all applications, which will remove any exercise of Council discretion. The submitter questions whether this is necessary and appropriate in all situations. If effective and streamlined procedures are established for initiating early consultations with hokonui runanga, followed by their subsequent involvement in applications for land use consents, and similar processes then concerns may be allayed. Furthermore, there is a proposal indicating that only activities deemed "hi-risk" might prompt comprehensive and formal consultation with and participation by hokonui runanga. If this criterion is adopted, it would be beneficial to establish a clear definition or qualification for what constitutes "hi-risk." Additionally, it can be inferred that applications categorised as not "hi-risk" would not entail full participation in the process by hokonui runanga.	The submitter requests the SASM and Mana Whenua chapters be considered for the reasons set out in the submission relating to consultation requirements.
Jet Boating NZ	S64.025	TEMP - Temporary Activities	TEMP-P3	Support	The submitter supports this policy as JBNZ events incorporate the use of private land. Such activities should be permitted with appropriate controls.	Retain as notified

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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	S68.005	SASM - Sites and Areas of Significance to Māori	SASM - General	Oppose	Identifying the whole district as SASM may unnecessarily require consent and consultation for day-to-day farm activities, increasing time, cost and workload. As objectives and policies regarding Ngāi Tahu values have been incorporated into the plan, there is no justification for the entire district to be a SASM. The SASM chapter should instead provide further clarity to plan users by identifying and delineating those specific sites, areas and landscapes that are significant to Māori. Similar approaches have been undertaken in other recently reviewed district plans.	Sites and Areas of Significance to Māori are identified and mapped in the planning maps through a transparent, consistent process.
John Baynes	S68.006	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.
John Baynes	S68.007	SASM - Sites and Areas of	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

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		Significance to Māori				control) provided by the proposed activity.
John Baynes	S68.008	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.
John Baynes	S68.009	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.
John Baynes	S68.010	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.~~
John Baynes	S68.011	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 ...
John Baynes	S68.012	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;
John Baynes	S68.013	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~~

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John Baynes	S68.014	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.
John Baynes	S68.015	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. ...
John Baynes	S68.016	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~~
John Baynes	S68.017	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose	Stoney Creek supports Indigenous Vegetation Clearance and Land Disturbance rules but finds Rule ECO-R1 too restrictive, especially for fencing. The rule's broad definition of "Land Disturbance" raises confusion, as it encompasses all land activities without clarification. The permitted width for disturbance is impractical for installing fences, it does not allow for access and maintenance. The rule lacks provisions for upgrading existing structures, which may have better environmental outcomes and should be enabled. Maintenance of improved pasture under ECO-R1(e) is more restrictive than NPSIB. The inclusion of a permitted activity rule for the incidental removal of indigenous species during exotic species control is supported but should be clarified in the rule. There should be no limits around the removal of deliberately planted vegetation. A restricted discretionary status would be more appropriate for minor environmental effects. Non-complying activity status for indigenous vegetation removal for those activities listed in ECO-R1(1) where this falls within a SNA does not acknowledge the presence of existing activities within SNAs (as	Preferred Relief: Withdraw ECO-R1 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised rule an exemption for indigenous vegetation removal and land disturbance associated with farming activities within the new Hokonui Hills Special Precinct (discussed further below). Alternative relief: Amend ECO-R1 as follows: Indigenous Vegetation Clearance and Land Disturbance associated with Indigenous Vegetation Clearance Activity status: Permitted 1. It is necessary for the following purposes:(aa) The installation, maintenance, repair, replacement or upgrade of: (i) Fences(ii) Farm tracks (iii) Farm infrastructure [Refer to proposed definition] (a) The maintenance, repair, or replacement or upgrade of existing lawfully established: ~~(i) fences,~~ (ii) vehicle tracks, (iii) roads, (iv) infrastructure, (v) walkways, (vi) firebreaks, (vii) dams, (viii) waterway crossings, or (ix) network utilities, ~~and the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i), and (vi)~~ ... (e) Maintenance of improved pasture outside of a SNA , ~~where: (i) the improved pasture~~

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					allowed for under the NPSIB). Therefore, Discretionary activity status is proposed for these activities.	~~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>
John Baynes	S68.018	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.
John Baynes	S68.019	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.

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John Baynes	S68.020	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
John Baynes	S68.021	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;
John Baynes	S68.022	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.
John Baynes	S68.023	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".
John Baynes	S68.024	NFL - Natural Features and Landscapes	NFL-R1	Oppose	The increased number of activities controlled in the Hokonui Hills ONL contradicts the comments made in the S32 report and there is seemingly no justification for the increase. The findings of the report are disputed, including the cost benefit analysis. Considers the rule framework overly restrictive and that it contradicts the policy framework which acknowledges the presence and benefits of pastoral farming, especially as the existing provision has not resulted in significant adverse effects.	Amend NFL-R1 to read: Activity status: Permitted Where: 1. The building or structure is for farming purposes, ~~excluding residential use~~ ; (a) Does not exceed ~~500 30~~ 500 m ² in area; and (b) Height shall not exceed ~~8 3~~ 8 m; 2. Buildings or structures for non-farming purposes; (a) The maximum height does not exceed 2m; and (b) The maximum gross floor area is no more than 5m ² 3. All buildings and structures (excluding fences and buildings and structures for farming purposes) must be finished in materials with a maximum reflectance value of 30%
John Baynes	S68.025	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 is required 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.

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						2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3.3. Any benefits provided by the proposed tree planting.
John Baynes	S68.026	NFL - Natural Features and Landscapes	NFL-R3	Oppose	S32 report states the operative plan controls were effective at managing activities within ONLs. As such, additional controls in the PGDP are not supported and should align more with the controls that exist currently.	Amend Rule NFL-R3 to read: Land disturbance and earthworks within an identified ONF/L Activity status: Permitted Where: X. Required for cultivation, fencing or pest plant management; or X. Associated with the construction of any road or track no greater than 7 metres in width or requiring more than 2 metres of cut or fill for a total distance greater than 100 metres; or X. The earthworks do not exceed 100 linear metres in any direction; and 1. The depth of the earthworks shall not exceed ~~1m~~ 2m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~1m~~ 3m above the original surface of the ground; and 3. the area of the earthworks shall not exceed 100m ² in any 12 month period; ~~and 4. the width of land disturbance for fencing shall not exceed 1m; and 5. the ground for fencing related land disturbance is reinstated to original levels within 48 hours of work being completed.~~
John Baynes	S68.027	NFL - Natural Features and Landscapes	NFL-R4	Oppose	Supportive of permitted activity status that allows earthworks to maintain existing facilities within an ONL, however considers the scope of NFL-R4 to be too narrow.	Amend Rule NFL-R4 to read: Maintenance repair, replacement or upgrade of buildings and structures (excluding fences) , critical infrastructure, existing roads, farm tracks, walking and cycling trails, waterway crossings, or improved pasture within an identified ONF/L Activity status: Permitted Where: 1. The scale of the ~~activity~~ critical infrastructure, road, farm or trail is not increased. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5 resulting from an increase in the scale of the activity. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3. 3. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape.
John Baynes	S68.028	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.~~
John Baynes	S68.029	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.
John Baynes	S68.030	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Amend	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any new farm track is too restrictive to farming operations.	Add a new rule NFL-R6A: New farm tracks within an identified ONF/L. Activity status: Permitted. Where: 1. Any new farm track is no greater than 7 metres in width. 2. Unretained cut and fill batters shall not: (a) be steeper than 2 horizontal to 1 vertical; (b) be constructed using moisture content susceptible soils; (c) have a bench with a width of more than 1.8m. 3. Excess material from the construction of the farm

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						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.
John Baynes	S68.031	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
John Baynes	S68.032	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
John Baynes	S68.033	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
John Baynes	S68.034	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.
John Baynes	S68.035	SUB - Subdivision	SUB-R4	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R4.
John Baynes	S68.036	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.
John Baynes	S68.037	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.
John Baynes	S68.038	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.
John Baynes	S68.039	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

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						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.
John Baynes	S68.040	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.
John Baynes	S68.041	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.
John Baynes	S68.042	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.
John Baynes	S68.043	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.
John Baynes	S68.044	EW - Earthworks	EW-R7	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R7 as follows: General Rural ZoneExcluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R7 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4,EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved:Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whetherthere is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
John Baynes	S68.045	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	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

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					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.	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.
John Baynes	S68.046	EW - Earthworks	EW-R9	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R9 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R9 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
John Baynes	S68.047	EW - Earthworks	EW-R14	Oppose	Stoney Creek supports a permitted activity standard for earthworks not otherwise provided for. It is considered existing protection of ONLs is achieved through other chapters and further restrictions are unnecessary in the Earthworks chapter.	Amend EW-R14 as follows: Earthworks and land disturbance not otherwise provided for General Rural Zone, Industrial Zone, Airport Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ Permitted 1. In any 12 month period, the total volume of earthworks does not exceed 1,000m3 per site. 2. All Earthworks Effects Standards are complied with. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: ...11. Whether there is a functional or operational need for the location of the activity
John Baynes	S68.048	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:

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						(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
John Baynes	S68.049	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.~~
John Baynes	S68.050	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.
John Baynes	S68.051	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.
John Baynes	S68.052	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.
John Baynes	S68.053	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 ...
John Baynes	S68.054	GRUZ - General Rural Zone	GRUZ-O3	Support	Supportive of recognizing the importance of supporting activities for primary production.	Retain GRUZ-O3 as drafted.
John Baynes	S68.055	GRUZ - General Rural Zone	GRUZ-O4	Support	Supportive of GRUZ-O4.	Retain GRUZ-O4 as drafted.
John Baynes	S68.056	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.
John Baynes	S68.057	GRUZ - General Rural Zone	GRUZ-P1	Support	Supportive of GRUZ-P1.	Retain GRUZ-P1 as drafted.
John Baynes	S68.058	GRUZ - General Rural Zone	GRUZ-P2	Support	Supportive of enabling rural industry in the rural zone.	Retain GRUZ-P2 as drafted.
John Baynes	S68.059	GRUZ - General Rural Zone	GRUZ-P3	Support	Supportive of GRUZ-P3.	Retain GRUZ-P3 as drafted.
John Baynes	S68.060	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.
John Baynes	S68.061	GRUZ - General Rural Zone	GRUZ-P5	Support	Supportive of GRUZ-P5.	Retain GRUZ-P5 as drafted.
John Baynes	S68.062	GRUZ - General Rural Zone	GRUZ-P6	Support	Supportive of GRUZ-P6.	Retain GRUZ-P6 as drafted.

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John Baynes	S68.063	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.~~
John Baynes	S68.064	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.
John Baynes	S68.065	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.
John Baynes	S68.066	GRUZ - General Rural Zone	GRUZ-P11	Support	Supportive of GRUZ-P11.	Retain GRUZ-P11.
John Baynes	S68.067	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.
John Baynes	S68.068	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
John Baynes	S68.069	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.
John Baynes	S68.070	GRUZ - General Rural Zone	GRUZ-R5	Support	Supportive of permitted activity status for the establishment of woodlots.	Retain GRUZ-R5 as drafted.
John Baynes	S68.071	GRUZ - General Rural Zone	GRUZ-R6	Support	Supportive of a permitted activity status for conservation activities.	Retain GRUZ-R6 as drafted.

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John Baynes	S68.072	GRUZ - General Rural Zone	GRUZ-R7	Amend	Supportive of permitted status for residential activities with minor amendments.	Amend GRUZ-R7 to read: Residential ActivityAll areas Activity status: Permitted Where: 1. For new residential units and new minor residential units, standard GRUZ-S1 Density is met; and 2. Any new building, ~~addition~~ , or ~~external~~ -alteration that increases the number of habitable rooms and activitycomplies with zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6 and GRUZ-S7; and 3. For minor residential units, the maximum floor area shall be 80m2; and 4. The residential unit is connected to telecommunications services (whether hardwired or wireless). Activity status where compliance is not achieved with: GRUZ-R7(1): as per GRUZ-S1 activity status and matters of discretion. GRUZ-R7(3)(2): Restricted Discretionary Matters of Discretion: 1. The matters of discretion of any infringed standard. GRUZ-R7(3): ~~Non-Complying~~ Discretionary GRUZ-R7(4): Restricted Discretionary Matters of Discretion: 1. Whether any form of telecommunication is available at the location the proposed residential unit 2. The functional need to having a residential unit in a location without access to telecommunication and whether there are suitable alternative locations for a residential unit on site.
John Baynes	S68.073	GRUZ - General Rural Zone	GRUZ-R9	Support	Supportive of a permitted activity rule for rural commercial activities.	Retain GRUZ-R9 as drafted.
John Baynes	S68.074	GRUZ - General Rural Zone	GRUZ-R11	Support	Supportive of a permitted activity status for homestay activities.	Retain GRUZ-R11 as drafted.
John Baynes	S68.075	GRUZ - General Rural Zone	GRUZ-R13	Support	Supportive of a permitted activity status for rural commercial recreation activities.	Retain GRUZ-R13 as drafted.
John Baynes	S68.076	GRUZ - General Rural Zone	GRUZ-R16	Support	Supportive of a permitted activity status for agricultural aviation activities.	Retain GRUZ-R16 as drafted.
John Baynes	S68.077	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.
John Baynes	S68.078	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
John Baynes	S68.079	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

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John Baynes	S68.080	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
John Baynes	S68.081	GRUZ - General Rural Zone	GRUZ-S4	Oppose	Reduced setback distances are sought for primary production buildings over 500 m2. The matters of discretion also do not anticipate two or more adjoining sites (legal parcels) that make up a single farm.	Amend GRUZ-S4 as follows: Setback to Side and Rear Boundaries All Areas Any building is setback from any side or rear boundary the minimum distances as follows: 1. Residential buildings are setback 30m; 2. Dairy sheds and buildings that house animals are setback 50m; 3. Buildings greater than 500 square metres are setback ~~200m~~ 50m , except for in the Rural Industry Precinct (PREC13) where the setback is 100m; 4. Buildings less than 10 square metres are setback 2m; and/or 5. All other buildings are setback 15m. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The adverse effects on rural character 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and sense of openness 3. The extent to which buildings are set back on the adjoining sites and the use of the intervening space 4. The reasons for the reduced setback 5. Noise and odour from housing animals 6. Reverse Sensitivity effects 7. The ownership of the adjoining site and whether it forms part of the same farming operation.
John Baynes	S68.082	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
John Baynes	S68.083	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

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						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.
John Baynes	S68.084	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.~~
John Baynes	S68.085	Interpretation	agricultural aviation activity	Support	Supportive of this definition.	Retain 'agricultural aviation activity' definition as drafted.
John Baynes	S68.086	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.
John Baynes	S68.087	Interpretation	conservation activity	Support	Supportive of this definition.	Retain 'conservation activities' definition as drafted.
John Baynes	S68.088	Interpretation	cultivation	Support	Supports the alignment of definitions with the National Planning Standards.	Retain 'cultivation' definition as drafted.
John Baynes	S68.089	Interpretation	dead holes	Support	Supports this definition.	Retain 'dead holes' definition as drafted.
John Baynes	S68.090	Interpretation	earthworks	Support	Supports this definition.	Retain 'earthworks' definition as drafted.
John Baynes	S68.091	Interpretation	farm quarry	Support	Supportive of this definition.	Retain 'farm quarry' definition as notified.
John Baynes	S68.092	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.
John Baynes	S68.093	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.
John Baynes	S68.094	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
John Baynes	S68.095	Interpretation	highly productive land	Amend	Supportive of the alignment of wording used in higher order documents but the definition references clauses of the NPSHPL that may cause confusion for plan users.	Amend the definition for Highly Productive Land to read: Has the same meaning as the National Policy Statement for Highly Productive LandMeans land that has been mapped in accordance with clause 3.4 of the National Policy Statement for Highly Productive Land and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) of the National Policy Statement for Highly Productive Land for what is treated as highly productive land before the maps are included

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						in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)
John Baynes	S68.096	Interpretation	improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'improved pasture' definition as drafted.
John Baynes	S68.097	Interpretation	indigenous vegetation	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'indigenous vegetation' definition as drafted.
John Baynes	S68.098	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
John Baynes	S68.099	Interpretation	land disturbance	Support	Supportive of the definitions with National Planning Standards.	Retain 'land disturbance' definition as drafted.
John Baynes	S68.100	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.
John Baynes	S68.101	Interpretation	mahinga kai	Amend	Details provided in the definition for Mahinga Kai would be more appropriate in the Mana Whenua chapter.	Amend the definition of mahinga kai to: Means the same as outlined in MW - 2.3.3.3 and is an all-inclusive term that refers to the ability to access resources for harvesting, the site where gathering of these resources occurs, the act of gathering and using the resource, and the good health of the resource. ~~As a result of this practical focus, mahinga kai is considered by Hokonui Rūnanga to be, in today's language, the principal 'environmental indicator' in natural systems. If mahinga kai is not present, or is unsafe to harvest, then that natural system is under stress and requires remedial action. Mahinga kai was and is central to the Ngāi Tahu and Hokonui way of life. The collection and processing of mahinga kai is an important social, cultural, environmental, and economic activity contributing to the overall well-being of Ngāi Tahu whānui. Mahinga kai practices rely on thriving and abundant biodiversity, safe and aesthetically pleasing places to practice, and the active transfer of knowledge between people. These attributes are dependent on the sustainable management of many other natural resources in the takiwā, especially waterbodies and the management of stormwater. Hokonui Rūnanga expect to be able to practice mahinga kai in our takiwā at multiple locations that are deliberately selected for the quality of the resource and its ability to sustain itself. —~~
John Baynes	S68.102	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.
John Baynes	S68.103	Interpretation	primary production	Support	Supportive of the alignment with national planning standards.	Retain 'primary production' definition as drafted.
John Baynes	S68.104	Interpretation	rural airstrip	Support	Supportive of this definition.	Retain 'rural airstrip' definition as notified.
John Baynes	S68.105	Interpretation	rural commercial recreation activity	Support	Supportive of this definition.	Retain 'rural commercial recreation activity' definition as drafted.
John Baynes	S68.106	Interpretation	rural environment	Support	Supportive of this definition.	Retain 'rural environment' definition as drafted.
John Baynes	S68.107	Interpretation	rural industry	Support	Supportive of the alignment with national planning standards.	Retain 'rural industry' definition as drafted.
John Baynes	S68.108	Interpretation	rural produce retail activity	Support	Supportive of this definition.	Retain 'rural produce retail activity' as drafted.

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John Baynes	S68.109	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.
John Baynes	S68.110	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
John Baynes	S68.111	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.
John Baynes	S68.112	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).
John Baynes	S68.113	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	Amend Appendix 5 in a way that: • Accurately reflects the significant presence of pastoral farming within the ONL; • Recognises the benefits provided by pastoral farming in terms of maintaining a sense of openness, landscape legibility and pest control, within the ONL; • Recognises that the patterns and values of indigenous biodiversity vary significantly across the extent of the ONL and the highest value area is concentrated within the Croydon Bush SNA; • Corrects the statement that the ONL is free of structures; • Recognises the historical and cultural significance of the area to the rural community; and • Make available all documents referred to within Appendix 5, the s32 Report and the Landscape Assessment prepared by Mike Moore publicly available on the Gore District Council website.

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					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.	
John Baynes	S68.114	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.
John Baynes	S68.115	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.
John Baynes	S68.116	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.
John Baynes	S68.117	Interpretation	silage pit	Oppose	This definition is broad and could be taken to include areas for the storage of hay or grain within a silo/container, or small scale storage of bagged feed. Alignment with the definition as per the Proposed Southland Land and Water plan is suggested.	Amend the definition of silage pit as follows: ~~Means an area constructed and used for the purpose of fermentation and storage for animal feed.~~ land or structures on which silage (plant material harvested while green for fodder and kept succulent by partial fermentation, but does not include baleage or hay) is stored, processed or directly utilised, excluding the storage of bales of plant material completely encapsulated in plastic.
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	S68.119	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.	Modified pastoral landscape should not be mapped as ONL Reduce restrictions relating to the Hokonui Hills ONL overlay

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					No evidence provided to suggest that the level of protection provided by the Operative Gore District Plan was insufficient.	
John Baynes	S68.120	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
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.
John Baynes	S68.122	Introduction	Description of the District	Support in part	The contribution of agriculture to the district's economy should feature in the description of the district. Agriculture is the backbone of the district's economic well-being.	Amend description of the district: The dominant land use in the district relates to agriculture, and agriculture is the backbone of the district's economy.
John Baynes	S68.123	Interpretation	abrasive blasting	Support	Adopts the National Planning Standard definition	Retain as notified
John Baynes	S68.124	Interpretation	access strip	Support	Adopts the Resource Management Act 1991 definition.	Retain as notified
John Baynes	S68.125	Interpretation	additions	Support	This definition relates specifically to historic heritage therefore provides clarity for the reader.	Retain as notified
John Baynes	S68.126	Interpretation	agricultural aviation activity	Oppose	SFF support the inclusion of a definition, however greater clarity and detail is required.	~~means the use of aircraft or helicopters used ancillary and in association with primary production.~~ Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed wing aeroplanes, helicopters, and unmanned

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						aerial vehicles
John Baynes	S68.127	Interpretation	agricultural, horticultural and pastoral activities	Oppose in part	While the definition is an accurate description of the activities associated with farming it is noted that the term 'rural production activities' is used in many places throughout the Plan. This is confusing and there should be consistency and clarity in the usage of terms. SFF seeks that the description in the definition for agricultural, pastoral, horticultural activities is retained but renamed 'rural production activities' and the term rural production activities used consistently throughout the plan.	Amend title and make any consequential amendments: ~~Agricultural, horticultural and pastoral activities~~ Rural production activities
John Baynes	S68.128	Interpretation	ancillary activity	Support	The notified definition follows the National Planning Standards.	Retain as notified
John Baynes	S68.129	Interpretation	artificial outdoor lighting	Support in part	This definition seems to be aimed at lighting that may have an impact on the outdoor environment, but the wording used here cannot realistically be called an appropriate definition for Artificial Outdoor Lighting. If it is artificial then the definition should cover electrical power. Further, the Council should decide if they wish to capture bonfires, camp fires or kerosene lamps in this definition; as the way it is written it could easily do so.	Amend definition and make any necessary consequential amendments: any electrically-powered exterior or nonresidential interior lighting and/or sign that emits directly into the outdoor environment. ~~and includes signs.~~
John Baynes	S68.130	Interpretation	biological diversity (or biodiversity)	Support in part	The notified definition follows the definition in the Resource Management Act 1991. However, in the RMA the shortened term of 'biodiversity' is not used as the Council has done in the Plan. It is suggested that if the Council is stating this is the RMA definition then only the RMA term should be used.	Amend term and make any necessary consequential amendments: Biological diversity ~~(or biodiversity)~~
John Baynes	S68.131	Interpretation	bore	Support	The notified definition follows the National Planning Standards.	Retain as notified
John Baynes	S68.132	Interpretation	building	Support	The notified definition follows the National Planning Standards	Retain as notified
John Baynes	S68.133	Interpretation	Definitions	Support	SFF recommends the Council include a definition for collector road.	Include new definition (Collector Road) and make any necessary consequential amendments.
John Baynes	S68.134	Interpretation	conservation activity	Support in part	While SFF supports this recognition of restoration planting, the definition needs further clarity and flexibility to properly acknowledge a wide range of conservation activities. For example, eradicating invasive species, like some types of willows, that are not automatically recognised as weeds or pests. The definition should also accommodate situations where introduced species do provide good food sources for native birds.	Amend and make any necessary consequential amendments: Activities to manage, maintain and/or enhance ~~Means the use of land for the management, maintenance and enhancement~~ of ecological values for indigenous vegetation and fauna and their habitats. It may include: ~~includes:~~ (a) both western Science or mātauranga Māori; (b) weed, invasive species and pest control; (c) fencing and farm fencing ; and (d) restoration planting.
John Baynes	S68.135	Interpretation	cultivation	Support	The notified definition follows the National Planning Standards	Retain as notified
John Baynes	S68.136	Interpretation	dead holes	Support	SFF supports the inclusion of this definition.	Retain as notified
John Baynes	S68.137	Interpretation	earthworks	Support	The notified definition follows the National Planning Standards.	Retain as notified

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John Baynes	S68.138	Interpretation	farm quarry	Support in part	On the whole, we support the definition, however it is not practical to require that a farm quarry can only serve farm activities that occur on the same site. The term site is defined in the National Planning Standards and the Plan as meaning as single record of title. Many farms will have a number of titles and it is not practical that a farm quarry use is limited to only the title on which it exists, rather than the full property or operation. Most farm quarries would serve rural production activities across the farm.	Amend definition and make any necessary consequential amendments: Means a location or area intermittently used in association with agricultural activities for the permanent removal and extraction of aggregates (clay, silt, rock or sand) for non-commercial use ~~within the same site where it is extracted.~~ It includes the area of aggregate resource and surrounding land associated with the operation of a farm quarry and which is used for farm quarrying activities. It does not include earthworks or the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the farm quarry
John Baynes	S68.139	Interpretation	farm track	Support	This definition captures the normal use of a farm track.	Retain as notified
John Baynes	S68.140	Interpretation	feedlot	Oppose	While this term is defined in the Plan, it does not feature in the Plan at all, therefore it does not need to be included.	Remove definition: ~~Means a stockholding area where cattle — (a) are kept for at least 80 days in any 6-month period; and (b) are fed exclusively by hand or machine.~~
John Baynes	S68.141	Interpretation	fences	Oppose	This definition is confusing and causes issues throughout the plan, and we suggest farm fences are excluded. All amendments must be made throughout the plan.	Amend definition: and make any consequential amendments: Means any structure, intended to be a permanent division, screen or barrier, but shall not include a farm fence.
John Baynes	S68.142	Interpretation	Definitions	Support	There are inconsistencies throughout the plan whereby the proposed definition of fences attempts to cater to multiple purposes. Having a separate definition for a farm fence would allow clear separation of rules/standards applicable. We recommend the Council simplifies it's approach to fencing in this respect and considers what the problem is it is actually trying to solve. We found limited narrative on fencing in any of the s 32 reports.	Include new definition "farm fences" and make any consequential amendments: Means any fence erected for the purposes of any primary production activity.
John Baynes	S68.143	Interpretation	fresh water	Support in part	This definition follows the RMA definition, however the RMA states 'freshwater or fresh water'. If the Council wishes to use the RMA definition this should be done verbatim.	Amend definition: ~~Fresh water~~ Freshwater or fresh water
John Baynes	S68.144	Interpretation	functional need	Support	The notified definition follows the National Planning Standards.	Retain as notified
John Baynes	S68.145	Interpretation	highly productive land	Support	The notified definition follows the National Policy Statement for Highly Productive Land.	Retain as notified
John Baynes	S68.146	Interpretation	indigenous vegetation	Support	The notified definition follows the National Policy Statement for Indigenous Biodiversity.	Retain as notified
John Baynes	S68.147	Interpretation	indigenous vegetation clearance	Oppose in part	As drafted, the definition does not provide for excluding grazing as it states 'clearing or removal of indigenous vegetation by any means'. Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being 'cleared' pursuant to the current proposed definition. Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assisting with regeneration. It is not clear what is meant by 'overplanting'. Where the vegetation is within areas of improved pasture, especially on hill country, overplanting (e.g. by	Amend definition and make any necessary consequential amendments: Means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, , burning or any other mechanical means. ~~as well as mob stocking.~~ It does not include grazing of pasture or improved pasture species in that area of indigenous vegetation.

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					helicopter) followed by grazing to trample in the seed is common practice and allows for pasture renewal. It is crucial that this be removed from the definition.	
John Baynes	S68.148	Interpretation	intensive indoor primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified
John Baynes	S68.149	Interpretation	Definitions	Support	We recommend a new definition is included which aligns with the Proposed Southland Land and Water Plan.	Include a new definition for Intensive winter grazing: Grazing of stock between May and September (inclusive) on forage crops (including brassica, beet and root vegetable crops), excluding pasture and cereal crops.
John Baynes	S68.150	Interpretation	landscape gardening	Support in part	The current definition is too broad and general, and does not appear to be scale-limited, as gardening usually is. It extends into agricultural activities like pastoral farming, arable growing, and horticulture. This definition can be remedied by excluding agricultural definitions and bringing in the concept of scale.	Amend definition and make any necessary consequential amendments: The small scale design, construction and maintenance of ornamental gardens and outdoor areas and growing and caring for plants. It includes the alteration or disturbance of land (or any matter constituting the land including soil, clay, sand and rock) that does not permanently alter the profile, contour or height of the land. To avoid doubt, this definition excludes agricultural activities.
John Baynes	S68.151	Interpretation	land transport infrastructure	Support in part	We agree to most of the items listed in the definition as objects that support the movement of people and goods by land. However, we do not believe clause m items actually do 'support the movement of people and goods by land'.	Accept most of the definition as notified but delete clause m and make any consequential amendments: (m) Stormwater management facilities, ventilation structures, drainage devices and erosion control devices; and
John Baynes	S68.152	Interpretation	minor residential unit	Support	The notified definition follows the National Planning Standards	Retain as notified
John Baynes	S68.153	Interpretation	modify	Support	The notified definition makes clear that 'modify' is in relation to an archaeological site	Retain as notified
John Baynes	S68.154	Interpretation	national grid yard	Oppose	The National Grid Yard definition needs to be amended so it is consistent with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1 around support structures. This definition and the yard widths are not consistent and unnecessarily onerous compared to the Code. It is vital to remember that the National Grid runs over private property, and farmers will be overwhelmingly affected by any regulation that exceeds the Code. This means the 12m distance around any structure is in excess of what is in the Code, and what is needed for engineering safety. The Code requires a safe distance of 8m around a 110kv pole. [Refer to original submission for full reasons at pg. 15]	Amend the definition to align with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1, and make any consequential amendments
John Baynes	S68.155	Interpretation	noise	Support	Support as definition has the same meaning as section 2 of the RMA.	Retain as notified
John Baynes	S68.156	Interpretation	noise sensitive activity	Support	SFF supports the activities listed as noise sensitive.	Retain as notified
John Baynes	S68.157	Interpretation	notional boundary	Support	The notified definition follows the National Planning Standards.	Retain as notified
John Baynes	S68.158	Interpretation	plantation forestry	Support	The notified definition follows the National Environmental Standards for Plantation Forestry	Retain as notified
John Baynes	S68.159	Interpretation	primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified

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John Baynes	S68.160	Interpretation	quarry	Support in part	Although there is a separate definition for farm quarries, they need to be clearly excluded from the definition of 'quarry'.	Amend definition to include below and make any consequential amendments: This definition does not include 'farm quarries'.
John Baynes	S68.161	Interpretation	reverse sensitivity	Support in part	SFF support the inclusion of this definition. However, it would be better to utilise the term 'lawfully established' as referred to in the Plan rather than using 'approved, existing or permitted activity'.	Amend definition and make any necessary consequential amendments: The potential for a lawfully established ~~an approved (whether by consent or designation), existing or permitted~~ activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an approved, existing or permitted activity.
John Baynes	S68.162	Interpretation	river	Support	Support as has the same meaning as the RMA.	Retain as notified
John Baynes	S68.163	Interpretation	root protection area	Oppose	It is recommended that the Council uses the term 'tree protection zone' instead of the rootzone area. The term 'tree protection zone' is used in a number of plans and policies in New Zealand. It is a term that is recognised by suitably qualified arborists and can easily be calculated by (a) canopy drip line + 1m; (b) trunk diameter at 1.4m height multiplied by 12; and (c) tall narrow trees = ½ x Height.	Rename this definition: ~~Root protection area~~ Tree protection zone
John Baynes	S68.164	Interpretation	rural airstrip	Support in part	The definition of rural airstrips will inappropriately capture an airstrip on a farm which is only used when fertiliser or spraying is done on that same farm. These airstrips will be located within a primary production property at a distance from settlements, so adverse effects will be internalised and/or are very short term and occasional. When not in use for aircraft, the airstrip will be used for grazing as part of the farm. Neighbours often work together and use the same contractor, so proximity to neighbours can be advantageous, and there is broad acceptance and understanding of the activity in the rural community.	Amend definition and make any necessary consequential amendments: Means any area of land in the rural environment intended or designed to be used, whether wholly or partly, for aircraft movement or servicing, excluding helicopters. This does not include land which is primarily used for grazing but intermittently as an airstrip or land area.
John Baynes	S68.165	Interpretation	rural industry	Support	Support as has the same meaning as the National Planning Standards.	Retain as notified
John Baynes	S68.166	Interpretation	sensitive activity	Support	SFF agrees with the list of sensitive activities.	Retain as notified
John Baynes	S68.167	Interpretation	sign	Support	Support the definition of 'sign' which has the same meaning as per the National Planning Standards.	Retain as notified
John Baynes	S68.168	Interpretation	silage pit	Support in part	More clarity is required for this definition.	Amend definition and make any necessary consequential amendments: Means an area constructed and used for the purpose of ensilement and fermentation of pasture , and storage of silage for animal feed.
John Baynes	S68.169	Interpretation	significant natural area (SNA)	Oppose	SFF does not agree with including areas meeting the criteria in Appendix 1 that have not been mapped as SNAs. It is our view that until areas are mapped and included in the plan, they should not be considered SNAs. We also do not agree with identifying SNAs through resource consent applications or Farm Environment Plans (FEPs). FEPs are not intended to be used as a trigger document for identifying SNAs. FEPs are farmer driven, created and funded, therefore tacking on a Council requirement which requires external	Amend definition and make any necessary consequential amendments: Has the same meaning as per the National Policy Statement for Indigenous Biodiversity and means: (a) Areas identified as SNA-1 (Waterfall Range) and SNA-2 (Pukerau Red Tussock Reserve) on the planning maps until a suitably qualified ecologist engaged by Gore District Council in partnership with landowners determines that it is not an SNA; or (b) any area that is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 4 and in consultation with the landowner. SNA also includes 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.

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					experts adds complexity and cost for farmers. The cost/expertise to carry out SNA mapping should lie with central and local government, not individuals. FEPs could include a note of any SNAs evident on the land, but the actual process of SNA identification must sit outside of these plans. We remind the Council that identification of SNAs must be carried out in consultation landowners, as per ECO-O2: 'Work in partnership with Local Authorities, Government agencies, mana whenua, stakeholders and landowners to identify and protect Significant Natural Areas'. Full reason pg. 21	
John Baynes	S68.170	Interpretation	vegetation clearance	Support in part	SFF requests this definition be amended to specifically exclude vegetation clearance undertaken in association with day-to-day farming. We are concerned that the definition will still catch many instances of ordinary pastoral farming practice in which vegetation clearance may have to be undertaken on a day-to-day basis and trigger the requirement for resource consent unnecessarily. Examples of such vegetation clearance include: clearance for the purpose of maintaining rural fire breaks, pasture maintenance, clearance of airstrips, helipads, vehicle entranceways, access ways and driveways, farm tracks and stock crossings of waterways, clearance around farm buildings and farm infrastructure, water supply dams, pipelines and troughs, pest plant/weedmanagement, cultivation, forestry harvesting, pruning and thinning, clearance or disturbance by animals including grazing, activities undertaken for the purpose of establishing a fence line, maintaining shelterbelts (including cutting of shelterbelt roots, activities associated with fruit tree or fruit vine plantations, clearance of vegetation that is fallen or dead, activities undertaken within the boundaries of any area of land, and clearance of pest plants. Farmers should not have to incur unnecessary delay and cost for routine vegetation clearance which will result in no more than minor adverse environmental effects.	Amend definition and make any necessary consequential amendments: Means (...) (c) does not include vegetation clearance which is ancillary to primary production activities, such as-- (i) the removal of sphagnum moss for the purpose of a harvest in accordance with regulation 48 or (...) (v) the grazing of improved pasture within the relevant setback from a natural wetland.pasture maintenance; (vi) clearance for the purpose of maintaining rural fire breaks; (vii) clearance of airstrips, helipads, vehicle entranceways, accessways and driveways, farm tracks and stock crossings of waterways; (viii) clearance around farm buildings and farm infrastructure, water supply dams, pipelines and troughs; (ix) cultivation; (x) clearance or disturbance by animals including grazing; (xi) activities associated with fruit tree or fruit vine plantations; and (xii) clearance of ve
John Baynes	S68.171	Interpretation	Definitions	Not Stated	Vehicle movements is referred to in the Transport Chapter, however no definition is included.	Include new definition for vehicle movements and make any consequential amendments.
John Baynes	S68.172	Interpretation	Definitions	Not Stated	To provide clarity, a definition for 'waste' should be included which aligns with the Waste Minimisation Act 2008.	Include new definition for waste and make any consequential amendments: Waste (a) means any thing disposed of or discarded; and (b) includes a type of waste that is defined by its composition or source (for example, organic waste, electronic waste, or construction and demolition waste); and (c) to avoid doubt, includes any component or element of diverted material, if the component or element is disposed of or discarded.
John Baynes	S68.173	Interpretation	wetland	Support	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Retain as notified

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John Baynes	S68.174	Interpretation	woodlot	Support in part	SFF considers the definition of woodlot should also exclude shelterbelts and trees planted for conservation purposes.	Amend definition and make any necessary consequential amendments: Means a stand of trees for the purposes of firewood, the creation of other wood products, a carbon sink, erosion control, pest, or wilding tree management purposes, but excluding plantation forestry, shelter belts and trees planted for conservation purposes.
John Baynes	S68.175	MW - Mana Whenua	MW-2.4	Oppose	We acknowledge the relationship Ngāi Tahu hold with the natural environment in Gore District, however we are deeply concerned by the approach to consider the entire district as a site and request that individual sites are identified and included in the planning maps.	Remove this sentence: ~~Instead of restricting the consideration of Ngāi Tahu cultural values to a discrete list of 'sites and Areas of Significance to Māori', the underlying relationship Ngāi Tahu hold with the natural environment is accounted for throughout the district via provisions spread throughout various chapters.~~
John Baynes	S68.176	UFD - Urban form and development	UFD-O1	Support in part	The Council should consider the development of the district in terms of the potential loss of highly productive land, which is essential for primary production. Support is given for the Council's acknowledgement of managing adverse effects between incompatible activities and zones.	Amend UFD-O1 to include: 10. considers the potential loss of highly productive soils.
John Baynes	S68.177	UFD - Urban form and development	UFD-O10	Support in part	Support is given to this objective which identifies the importance of primary production activities being able to operate efficiently and effectively. However, the contribution of these activities should also be protected. To simply recognise the contribution of an activity does not provide the activity with protection.	Amend UFD-O10: Primary production and rural industry activities are able to operate efficiently and effectively and the contribution they make to the economic, social wellbeing and prosperity of the District is recognised and protected.
John Baynes	S68.178	UFD - Urban form and development	UFD-O11	Support	This objective should refer to 'highly productive land' as this term is defined within the Plan.	Amend UFD-O11: ~~Productive, versatile~~ Highly productive land and natural, physical and cultural resources located within rural areas that are of significance to the District are protected and maintained.
John Baynes	S68.179	ENRG - Energy	ENRG-O4	Support in part	This objective should reference safety as well as efficiency in operation.	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.
John Baynes	S68.180	INFR - Infrastructure	INFR-Overview	Support in part	Highly productive land may not be a suitable site for infrastructure and this should be noted in the overview.	Amend INFR-Overview: However, some sites technically ideal for the location of infrastructure may be unsuitable having regard to their environmental effects, including impacts on landscape and biodiversity values, being highly productive land or the underlying relationships Ngāi Tahu hold with the natural environment.
John Baynes	S68.181	INFR - Infrastructure	INFR-S3	Support in part	SFF questions why there is a different maximum height of any utility pole or mast as 25m for Rural Zone, Rural Lifestyle Zone, General Industrial Zone and Light and Industrial Zone and 13m for all other zones. The maximum height should be the same across all zones. There should also be a requirement for landowner consultation, particularly when consent is triggered.	Amend INFR-S3 to be the same across zones, either 25m or 13m. Add additional matter of discretion: 5. consent with landowner.
John Baynes	S68.182	INFR - Infrastructure	INFR-S5	Oppose in part	SFF does not oppose the setback distances provided these do not apply to farm fencing. We have proposed a new definition for 'farm fencing' and it is crucial that this is accepted for farmers to be able to carry out daily farming operations. There is no need to disincentivise an activity like fencing, which has ultimate positive benefits for biodiversity, by requiring a resource consent to construct a fence. Fencing setbacks are covered by	Amend INFR-S5: 1. Any infrastructure building or structure (not including a farm fence which is not subject to setbacks) must be set back from the closest bank of any stream or river as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and 4); and (c) 5m for low order rivers or streams (order 1 and 2).

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					regional plans and therefore the duplication contained in the PDP must be removed.	
John Baynes	S68.183	TRANS - Transport	TRANS-S3	Oppose in part	This standard refers to vehicle movements which are shown in italics, however no corresponding definition appears in the interpretation chapter. Without a definition of vehicle movements, it is difficult to comment on this standard. However, SFF do not support limitations on vehicle movements for farming purposes. In any one day there may be several 'vehicle movements' occurring as part of farming operations, particularly in busy seasons. While this is unlikely to be greater than 60 movements, there should not be any restrictions on the number of movements which can occur on farm. A farmer should not have to apply for a resource consent to allow multiple vehicles to visit their farm for farming operations. The reverse sensitivity effects of multiple vehicle movements are likely to be minimal if the movements are related to primary production in a rural setting.	Include definition of vehicle movements or specify that movements is in relation to vehicles. Amend TRANS-S3: The vehicle crossing is for on-site activities that individually or collectively generate less than 60 vehicle movements per day. This does not apply to vehicle movements for primary production activities.
John Baynes	S68.184	CL - Contaminated Land	CL-P1	Oppose in part	Any investigation must be consistent with the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) which does not require primary production land investigations for existing primary production land use (s 5,(9)). It should be clear in this policy that the NES-CS is the basis of required investigations.	Amend CL-P1: Identify sites, as per the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 , that are known to contain contaminated soil as a result of current or historic land uses and activities.
John Baynes	S68.185	HAZS - Hazardous Substances	HAZS-Overview	Support	Support is given to the focus on managing effects of hazardous substance on sensitive environments and on environments where sensitive activities are located in higher densities. The focus should be on the management of significant hazardous facilities.	Adopt Overview as drafted.
John Baynes	S68.186	NH - Natural Hazards	NH-Overview	Support in part	General support is given to the overview which identifies a risk-based approach to natural hazards. SFF supports enabling non-liveable farm ancillary buildings as permitted activities within the natural hazard areas as long as this has been clearly communicated to the landowners along with the associated risks of doing so. This means the landowner is fully informed when they make the decision to locate ancillary buildings that have a functional need in or around coastal and flood hazard areas.	Amend Overview for clarity to enable non-liveable farm ancillary buildings as permitted activities within the natural hazard areas.
John Baynes	S68.187	NH - Natural Hazards	NH-P1	Support	Support is given to a risk-based approach to natural hazards. Landowners must be consulted prior to and in the process of any mapping.	Retain NH-P1 as drafted.
John Baynes	S68.188	NH - Natural Hazards	NH-P3	Support in part	Mahinga kai is defined in the Plan's interpretation therefore italics emphasis should be added for consistency.	Amend NH-P3: Add italics emphasis to ' mahinga kai '
John Baynes	S68.189	NH - Natural Hazards	NH-P7	Support	Support is given as this policy provides a nonregulatory approach.	Retain NH-P7 as drafted.

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John Baynes	S68.190	NH - Natural Hazards	NH-Additional provisions sought	Support	There should be provision for unoccupied farm buildings in natural hazard areas as these have a lower risk than occupied buildings.	Include New Rule
John Baynes	S68.191	HH - Historical Heritage	HH-P9	Support in part	Public access requires landowner consent. Heritage properties/sites are often people's homes and consent is therefore required from the landowner.	Amend HH-P9: 1. there are measures to minimise obstruction of public access, if access has been granted by the landowner , and/or views of the heritage item or archaeological site from adjoining public places, where relevant and appropriate;
John Baynes	S68.192	HH - Historical Heritage	HH-P11	Support in part	Heritage buildings located on farmland can pose a risk to health and safety and be expensive for farmers to maintain. It is important that farmers have the ability to demolish or partially demolish if required. Any risk to safety of persons should warrant demolition. Determining what is considered a 'significant risk' to safety could be problematic and subjective.	Amend HH-P11: Avoid partial demolition of scheduled heritage items unless it is demonstrated that: 1. the part of the heritage item to be demolished poses a ~~significant~~ risk to the safety of persons or property; and/or...
John Baynes	S68.193	HH - Historical Heritage	HH-P12	Support in part	Heritage buildings located on farmland can pose a risk to health and safety and be expensive for farmers to maintain. Any risk to safety of persons should warrant demolition. Determining what is considered a 'significant risk' to safety could be problematic and subjective.	Amend HH-P12: Avoid total demolition of scheduled heritage items unless: 1. the heritage item poses a ~~significant~~ risk to the safety of persons or property; and...
John Baynes	S68.194	HH - Historical Heritage	HH-P14	Support	It is important to encourage non-regulatory methods for heritage conservation.	Retain HH-P14 as drafted.
John Baynes	S68.195	TREE - Notable Trees	TREE-Additional provisions sought	Support	SFF supports the recognition and identification of notable trees which are of importance to the district and its communities. However, where a notable tree is located on private land it is important that the Council engage and work with landowners to ensure the tree is best managed for future generations.	Include a new policy: Consult and engage landowners where a notable tree or trees is located on private land.
John Baynes	S68.196	SASM - Sites and Areas of Significance to Māori	SASM-Overview	Support in part	Typo to be amended.	Amend Overview: The Gore District Plan manages the impacts of high-risk activities on Ngāi Tahu cultural values, as opposed to restricting a wide range of activities at specific locations.
John Baynes	S68.197	SASM - Sites and Areas of Significance to Māori	SASM-O1	Oppose	SFF does not agree with the approach to consider all 'land, waterbodies, natural features and marae within Gore District as site and areas of cultural significance. Farmers have a right to know what is on their land so they can plan for current and future land use. The approach proposed in the PDP creates a high level of uncertainty for all landowners in the district.	Amend SASM-O1: Those All land, waterbodies, natural features, and marae within Gore District which are identified as site(s) of significance to Māori in the Planning Maps are recognised as sites and areas of cultural significance to mana whenua and/or tangata whenua, and are afforded appropriate considerations relative to the cultural values identified in MW-2.3 in relation to their management, development, and use.
John Baynes	S68.198	SASM - Sites and Areas of Significance to Māori	SASM-P1	Oppose	It is important to protect existing use rights therefore this policy requires an amendment. S 10 of the RMA discusses existing uses in relation to land protected and SFF request the policy represents this. The policy also implies that there may be other cultural values other than what is listed in MW-2.3. However, this does not appear to be the intention as the MW chapter specifically lists and defines the cultural values. The wording should be amended to provide clarity that it is only the values listed in MW-2.3 which the policy seeks to address.	Amend SASM-P1: New use, subdivision, and development is enabled where adverse effects on Ngāi Tahu cultural values, ~~including those~~ listed in MW-2.3, are avoided, remedied or mitigated.

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John Baynes	S68.199	SASM - Sites and Areas of Significance to Māori	SASM-P2	Oppose	The policy implies that there may be other cultural values other than what is listed in MW-2.3. However, this does not appear to be the intention as the MW chapter specifically lists and defines the cultural values. The wording should be amended to provide clarity that it is only the values listed in MW-2.3 which the policy seeks to address.	Amend SASM-P2: The impact of proposed activities on Sites of Significance to Maori as identified in the Planning Maps on the Ngāi Tahu cultural values listed in MW2.3, and their underlying relationship with the natural environment is determined in partnership with Hokonui Rūnanga.
John Baynes	S68.200	ECO - Ecosystems and Indigenous Biodiversity	ECO-O1	Support in part	This objective is supported, however, the focus should be on identification of SNAs as per the NPS-IB.	Amend ECO-O1: Maintain, through the identification of SNAs , indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas).
John Baynes	S68.201	ECO - Ecosystems and Indigenous Biodiversity	ECO-O2	Support	We support the recognition of the need to work with landholders to successfully identify and protect sites which meet the criteria for significant natural areas. Method Bio.3 of the Southland Regional Policy Statement requires collaboration with key stakeholder groups in addressing biodiversity issues within the region including direct (one on one) consultation with land owners whose properties contain threatened, at risk or rare habitat types. The recognition of the key role of people-in-place in managing indigenous biodiversity through both kaitiakitanga and stewardship is paramount to maintaining and improving indigenous biodiversity, as is the need to focus more widely than on managing a limited number of sites which meet the criteria for 'significance'.	Retain ECO-O2 as drafted.
John Baynes	S68.202	ECO - Ecosystems and Indigenous Biodiversity	ECO-O3	Support in part	Amendments are required to this objective to ensure alignment with Policy 7 of the NPS-IB.	Amend ECO-O3: Provide for ~~appropriate~~ new subdivision, use and development within Significant Natural Areas where the values of the area can be ~~maintained and enhanced~~ avoided or managed .
John Baynes	S68.203	ECO - Ecosystems and Indigenous Biodiversity	ECO-O4	Support in part	Section 7 of the RMA requires that in the protection of natural and physical resources all persons shall have particular regard to kaitiakitanga. The objective is clear and adequately addresses the matters relating to mana whenua and the ongoing or potential loss of indigenous biodiversity, whilst meeting the requirements of the Southland Regional Policy Statement. A concern that has been raised is the level of public accessibility that may be required to be provided to enable customary use. While we agree that customary use should be recognised and provided for, we caution that this should not be provided to the detriment of efficient land management by private landowners. Consideration also may need to be given to appropriate compensation where protection / enablement of customary use comes at a cost to the landowner.	Amend ECO-O4: 3. 'enabling customary use upon landowner consent '
John Baynes	S68.204	ECO - Ecosystems and Indigenous Biodiversity	ECO-P1	Support	We support this policy as, again, we stress the importance of working in partnership with landowners	Retain ECO-P1 as notified.

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John Baynes	S68.205	ECO - Ecosystems and Indigenous Biodiversity	ECO-P2	Support in part	SFF understands the need to protect SNA's but considers that the proposed policy fails to fully acknowledge the role of landowners in achieving environmental outcomes. The plan needs to provide for minor works undertaken as part of normal farming activities to occur to ensure that landowners can continue with reasonable use of their interest in the land. It is critical to provide a pathway for maintenance, repair, replacement or minor upgrades of infrastructure and for new small scale activities integral to farm management to occur as a permitted activity even if this is located within SNA's and involves the removal of indigenous vegetation. Wording is proposed to provide clarity around the enablement of activities within a lawfully established activity.	Amend ECO-P2: ~~Allow~~ Enable activities within Significant Natural Areas that may impact indigenous biodiversity values where: 1. This is for the maintenance and development of a lawfully established activity;
John Baynes	S68.206	ECO - Ecosystems and Indigenous Biodiversity	ECO-P3	Support	SFF supports the need for provisions within the District Plan to protect SNAs from inappropriate subdivision, use and developmen	Retain ECO-P3 as notified.
John Baynes	S68.207	ECO - Ecosystems and Indigenous Biodiversity	ECO-P6	Support in part	Landowners are best placed to promote restoration of indigenous biodiversity on their land.	Amend ECO-P6: Promote the restoration of indigenous biodiversity by prioritising: (...) 7. initiatives by landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity.
John Baynes	S68.208	ECO - Ecosystems and Indigenous Biodiversity	ECO-P7	Support in part	The key role of landowners in the protection, enhancement and restoration of land must not be understated. Landowners must receive not only support from the Council, but also enablement in this task.	Amend ECO-P7: Protect, enhance and restore Significant Natural Areas by: (...)5. Supporting initiatives and enabling ~~by~~ landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity.
John Baynes	S68.209	ECO - Ecosystems and Indigenous Biodiversity	ECO-P8	Support in part	SFF supports the need for provisions within the District Plan to protect SNAs from inappropriate subdivision, use and development which recognises the existence of working pastoral farms and their contribution to the outstanding landscapes of the district. It is proposed to update the policy to apply to subdivision, use and development within an SNA, rather than preventing or limiting any subdivision, use or development within the whole District.	Amend ECO-P8: When assessing consents for subdivision, use and development within SNAs , avoid effects which will: (...)
John Baynes	S68.210	ECO - Ecosystems and Indigenous Biodiversity	ECO-P9	Support in part	The proposed policy acknowledges the role of existing activities within SNA's however the Council has failed to identify aspirations of rural communities. The current policies do not provide landowners the ability to respond to changing climates, respond to technological advancements or changes in understandings around good management practice. Changes are proposed to include development of existing pastoral farms in this policy. A nuanced approach that considers mitigation, design, and adaptive management can lead to better outcomes in terms of sustainable development, environmental stewardship, and social well-being. We believe that a more balanced and pragmatic approach is necessary to address	Include in ECO-P9: When assessing resource consents in Significant Natural Areas, consider the following matters: ... 9. The necessity for the activity to provide for the maintenance and development of existing working pastoral farms to be innovative, to respond to changing climates, markets or global conditions, or to respond to technological advancements or changes in understandings around good management practice. 10. If the resource consent application is for a lawfully established activity.

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					the complexities of environmental and social challenges effectively. It is also recommended that this policy provide for lawfully established activities.	
John Baynes	S68.211	ECO - Ecosystems and Indigenous Biodiversity	ECO-P10	Support in part	We fully support the establishment of the Biodiversity Stakeholder Group. It will be important for this group to provide ongoing assistance to support landowners. SFF also supports developing a biodiversity strategy and urges the council to involve stakeholders and landowners in the development of this. The Biodiversity Stakeholder Group could be tasked with the drafting of the strategy. In the development of the Council's Long-Term Plan, the Council should look to provide financial assistance or rates rebates/remission for ratepayers with identified SNAs. Farm fencing helps to protect areas of indigenous biodiversity therefore it should be specifically identified in this policy.	Amend ECO-P10: Maintain indigenous biodiversity across the district by: (...) 5. Establishing a Biodiversity Stakeholder Group to review District Plan provisions, encourage ongoing non-regulatory assistance, and ~~enhance~~ support landowners in their engagement with Council ; (...) 8. Recognising the benefits of farm management practices and active management of indigenous biodiversity, including but not limited to voluntary animal and plant pest and stock control, farm fencing and/or formal legal protection.
John Baynes	S68.212	ECO - Ecosystems and Indigenous Biodiversity	ECO-P11	Support in part	The provision for biodiversity offsets and clear guidance about how they may be used is appropriate to achieve the purpose of the Act. However, the policy may benefit from some clarification. It is unclear what constitutes a 'residual' adverse effect as opposed to an adverse effect, as defined in section 3 for the RMA.	Provide a definition of residual adverse effects. Amend ECO-P11: Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity on indigenous biodiversity within an SNA where: (...)
John Baynes	S68.213	Interpretation	Definitions	Not Stated	ECO-p12 could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities).	Include a definition of exotic weed.
John Baynes	S68.214	ECO - Ecosystems and Indigenous Biodiversity	ECO-P12	Support in part	This rule could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities	Include a definition of exotic weed.
John Baynes	S68.215	ECO - Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose	Lawfully established' appears in this rule in italics, implying it is defined in the interpretations, but there is no corresponding definition in the interpretations section. ECO-R1 as currently drafted is too restrictive and will not allow for reasonable farming activities to be easily carried out. Fencing is a clear example of where the 1m width is insufficient. Another example of where the proposed width is insufficient is firebreaks, which are proposed as 1.5m. Any firebreak that was only permitted 1.5m for the maintenance, repair, replacement of upgrade would not be fit for purpose. The District Plan needs permitted activities that allow clearance in line with existing farming practices, to enable people and communities to provide for their health and safety,	Include a definition for 'lawfully established' (if that is the intention) or remove italics. Amend ECO-R1: Where: 1. It is necessary for the following purposes: (a) The maintenance, repair or replacement or upgrade of existing lawfully established: (i) fences and farm fences (ii) vehicle and farm tracks; (...) (ix) network utilities and ~~the clearance of land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i) and (vi).~~ (...) (e) Maintenance of improved pasture where: (i) the improved pasture has not become a mapped SNA, and (...) <i>NOTE - the 1.5m limit for vegetation clearance and land disturbance associated with fences in ECO-R1 was withdrawn by Council resolution on 21 November 2023.</i>

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					economic, social and cultural well-being and to reflect s 5(2) of the RMA. It is important to specify that (e)(i) applies to mapped SNAs. It is our view that mapping of SNAs must occur before treating areas as SNAs. See full reason on pg 61 of submission	
John Baynes	S68.216	ECO - Ecosystems and Indigenous Biodiversity	ECO-R2	Support in part	This rule could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities). Typo must be amended.	Amend ECO-R2: Planting of exotic weed species identified in ~~a~~ the Southland Regional Pest Management Plan.
John Baynes	S68.217	ECO - Ecosystems and Indigenous Biodiversity	ECO-R3	Support in part	This rule could be strengthened by providing a definition of 'exotic weed species'. The classification of plants as a weed can be subjective, for example white clover is considered to be a weed by some while its growth is encouraged by others (especially within rural communities). Typo must be amended.	Include a definition for animal pests. Amend ECO-R3: The intentional release or farming of animal pests identified in ~~a~~ the Southland Regional Pest Management Plan.
John Baynes	S68.218	ECO - Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	We support the inclusion of a new rule which provides for indigenous vegetation clearance for any purpose other than contained in ECO-R1(1) or (3) as a permitted activity. This would capture the ability to carry out minor indigenous vegetation clearance (i.e. the clearance of a single plant) for various purposes including beautification and normal farming activities. It is unreasonable to expect landowners to apply for a resource consent when carrying out minor clearance.	Include new rule providing for indigenous vegetation clearance for any purpose other than contained in ECOR1(1) or (3) as a permitted activity.
John Baynes	S68.219	NFL - Natural Features and Landscapes	NFL-O1	Support	This objective aligns with s 6(a) of the Resource Management Act 1991. SFF supports the need for provisions within the District Plan to protect ONF/Ls from inappropriate subdivision, use and development. It is considered that the plan should seek to ensure any subdivision, use and development in ONF/Ls maintains the core values which make the landscape or feature outstanding, rather than preventing or limiting any subdivision, use or development.	Amend NFL-O1: To protect the values and characteristics of the Outstanding Natural Features and Landscapes of the Gore District from inappropriate subdivision, use and development by maintaining the core values of the Outstanding Natural Feature or Landscape.
John Baynes	S68.220	NFL - Natural Features and Landscapes	NFL-P1	Support	We support the practical approach adopted by this policy recognising and providing for the existing rural activities. SFF strongly supports a planning approach that recognises this principal role that landowners fulfil as managers, stewards and funders (both financially and in terms of time and effort committed) of the District's natural and physical resources with a long term view (often intergenerational) on how these need to be managed.	Retain NFL-P1 as notified.
John Baynes	S68.221	NFL - Natural Features and Landscapes	NFL-P2	Support in part	The purpose of NFL-P2 is supported however we have some concerns with the interpretation of angling fisheries species. It is requested that this be updated to refer to native fish species.	Amend NFL-P2: Provide for and encourage the restoration and/or enhancement of the natural character of the Te Au Nui Pihapiha Kanakana Mataura Falls where: 1. Restoration and/or enhancement will achieve long-term improvement in natural character, landscape and associated Ngāi Tahu cultural values; and/or 2. It will assist in the restoration of

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						indigenous biodiversity or ecosystems and angling and native fisheries species;
John Baynes	S68.222	NFL - Natural Features and Landscapes	NFL-P4	Support in part	Existing activities within the ONF/L should be considered when assessing resource consents.	Amend NFL-P4: When assessing resource consents within Outstanding Natural Features and Landscapes, consider the following matters (...). The presence of existing activities within the ONF/L and whether the activity is changing in intensity, scale or character
John Baynes	S68.223	NFL - Natural Features and Landscapes	NFL-Additional provisions sought	Support	A new policy could be included to ensure that exotic plants do not adversely affect the ONL/F.	If the amendments to NFL-R2 are accepted then a new policy is recommended: Avoid planting exotic tree species that would affect indigenous biodiversity values and/or are prone to wilding spread in hill and high country area.
John Baynes	S68.224	NFL - Natural Features and Landscapes	NFL-R1	Support in part	SFF supports the distinction in this rule between buildings and structures for farming purposes and non-farming purposes. There should be a greater allowance permitted for farming purposes, as contained in the draft Plan. However, the total area of 30m ² limits the size significantly and it is requested this is increased. Some of the proposed ONF/L's incorporate farmland, therefore, it is important to enable structures and buildings required to support farming activities, such as mustering huts or pump stations.	Amend NFL-R1: Activity status: Permitted Where: 1. The building or structure is for farming purposes, excluding residential use; (a) Does not exceed ~~30~~ 500m² in area; (b) Height shall not exceed ~~83~~ m; 3. All buildings and structures (excluding those for farming purposes)
John Baynes	S68.225	NFL - Natural Features and Landscapes	NFL-R2	Support in part	This rule should provide for the planting of nonindigenous trees under specific conditions such as for shelterbelts. The planting of shelter belts and horticultural planting are essential components of farming and should be a permitted activity. Shelterbelts are an important part of pastoral farming for livestock sheltering purposes, and also reduce the effects of wind erosion. It is considered that there would be no increased visual effects from planting exotic trees instead of indigenous trees. Shelterbelts are often planted in non-indigenous vegetation therefore we are requesting that provisions be provided for non-indigenous planting to be included in this permitted rule. As above, it is recommended to include a new policy which avoids planting exotic tree species that would affect indigenous biodiversity.	Amend NFL-R2: Activity status: Permitted Where: 1. The tree planting is of indigenous species and for restoration, conservation, or hazard prevention measures. 2. The tree planting is for the purposes of planting a shelterbelt or windbreak. (...) Matters of Discretion: 1. Effects on the values as listed in NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, ~~including those listed in MW2.3.~~ 3. Any benefits provided by the proposed tree planting.
John Baynes	S68.226	NFL - Natural Features and Landscapes	NFL-R3	Support in part	SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m ² in a 12-month periodSFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale	Amend NFL-R3: Land disturbance and Earthworks within an identified ONF/L (excluding for the laying of stockwater, drainage or other utility pipes, or stock exclusion) Activity status: Permitted Where: 1. The depth of the earthworks shall not exceed ~~12~~ 2m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~13~~ 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/or 4. the width of land disturbance for fencing shall not exceed 1m; and 5. the ground for fencing related land disturbance is reinstated to original levels within 48 hours of work being completed. 4. The land disturbance and earthworks are for the removal of shingle or stone for use on the same property to maintain tracks.

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					earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m² in a 12-month period. SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m² in a 12-month period. SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m² in a 12-month period. To ensure that farmers can meet these regional council requirements, land disturbance for stock exclusion (including stock water installation / upgrade to enable stock exclusion) should be excluded from this rule. Beyond stock exclusion requirements: earthworks may be required for drainage, upgrades / repairs to stock water schemes. There should not be an annual limit to this work as it is not practical to stop the work once 100m of drain / pipe has been laid. If drains / water pipe are being laid, they need to be laid to the extent of that required to complete the job.	
John Baynes	S68.227	NFL - Natural Features and Landscapes	NFL-R4	Support in part	The proposed permitted rule provides for the ongoing maintenance of existing roads, farm tracks, walking and cycle trails within an ONF/L, however amendments are proposed to provide greater clarity on what is permitted.	Amend NFL-R4: NFL-R4 Maintenance, repair, replace or upgrade of buildings and structures (excluding farm fences) critical infrastructure, existing roads, farm tracks, walking and cycling trails, waterway crossings, or improved pasture within an identified ONF/L.
John Baynes	S68.228	NFL - Natural Features and Landscapes	NFL-R5	Support in part	Fencing is important for keeping out stock or pests from native bush and waterways, therefore provides a positive effect. SFF is unsure why the Council would limit the fencing type to only post	Amend NFL-R5: Activity status: Permitted Where: 1. The fence is a farm fence ~~Note: fences are a structure and therefore subject to the river setback rules.~~ Activity Status where compliance is not achieved: Restricted discretionary ~~Matters of discretion:~~ 1. Effects on the values listed within NFL APP Appendix 5.2. Impacts on Ngāi Tahu cultural values,

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					and wire as permitted. Other types of fencing, such as post and rail or waratah fencing, require a resource consent as currently drafted. It is our view that farmers should not have to apply for a resource consent where fencing is for the purposes of keeping out stock or pests. Such a requirement will impact on farmers' ability to carry out day-to-to farming operations. We have made earlier comments on the definition of fencing, to ensure that all types of fences are included We have proposed a new definition for 'farm fences' and it is crucial this is adopted to ensure NFL-R5 achieves the intended purpose.	~~including those listed in MW 2.3.~~
John Baynes	S68.229	NFL - Natural Features and Landscapes	NFL-R6	Oppose	SFF request this rule is deleted as it duplicates ECO-R1.	Delete NFL-R6
John Baynes	S68.230	NFL - Natural Features and Landscapes	NFL-R6	Oppose	SFF assume this rule should be NFL-R7. However, if NFL-R6 (above) is deleted then this rule will remain NFL-R6. It is important for farmers to be able to develop/erect farm fences, new roads/farm tracks when needed. Such reasons could include supporting the safe transfer of animals, changes to landscape caused by extreme weather and health and safety. We do not agree with this being a restricted discretionary activity and request this is changed to permitted.	Amend NFL-R67: New Roads, farm fences, farm tracks, walking and cycling tracks within an identified ONF/L Activity status: ~~Restricted Discretionary~~ Permitted ~~Matters of discretion:~~ ~~1. Effects on the values as listed within NFL APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW 2.3. 3. The necessity of what is proposed and any alternatives. 4. Mitigation measures proposed.~~
John Baynes	S68.231	NFL - Natural Features and Landscapes	NFL-R7	Oppose	Mineral extraction activities, other than farm quarries, should be a discretionary activity except in specific ONLs where mineral extraction is identified as not compatible with maintaining outstanding landscape values.	Change activity status: Mining and Quarrying within an identified ONF/L Activity status: ~~Non-complying Discretionary~~ Activity status where compliance is not achieved: N/A
John Baynes	S68.232	PA - Public Access	PA-O1	Support in part	The District Plan needs to be clear that access is not available across private land unless with permission from the landowner. The landowner should not be compelled by the District Plan to always provide access.	Amend PA-O1: Public access, when approved by a landowner , is provided to and along waterbodies with high recreational, scenic, Ngāi Tahu cultural or amenity values.
John Baynes	S68.233	PA - Public Access	PA-O3	Support in part	This objective needs to include recognition that this access should not result in adverse effects on the rights of private property owners. Many rural landowners, particularly riparian margin landowners, have had encounters with unwelcome trespassers, some with dogs, that are disruptive to their farming operations, put themselves into dangerous situations, or create nuisance effects like littering or human waste. It may also be appropriate to limit access across private property during certain periods - for example when this will be unsafe or will disrupt farming activities, such as when tree felling or earthmoving is occurring, or during harvest or lambing; and there may be areas that are simply not appropriate to allow public access into at any time due to safety or other considerations.	Amend PA-O3: Public access does not result in adverse effects on natural character, indigenous biodiversity, historic heritage, cultural, landscape values, ~~or~~ healthy and safety, or the rights of landowners.

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John Baynes	S68.234	PA - Public Access	PA-P2	Oppose	SFF does not support the creation of esplanade reserves or strips where land is being subdivided for the purpose of facilitating farming in the Rural Zone. Creation of public access alongside farmland encourages problems for farmers, including theft of farm property and stock, and harassment/harm of farm animals. Such access should require landowner permission and be at their discretion.	Amend PA-P2: Maintain and enhance public access by: 1.requiring for urban areas through the subdivision process the provision of esplanade reserves and/or esplanade strips along waterbodies, ~~particularly in urban areas~~ and along public access corridors.
John Baynes	S68.235	PA - Public Access	PA-Additional provisions sought	Support	A new policy is needed for education of the public as to where public access is available, and where landowner permission is required. The District Plan maps multiple categories that plan users may believe are freely available for public access, like SNAs, ONF/Ls, and waterways, yet many of these are on private land and access is only by the permission of the landowner. We do not want users of the District Plan to think they can wander over private land at will. Sometimes private land will extend right down to the water or further, depending on the Certificate of Title. Sometimes esplanade reserves will not be continuous but be interspersed with private land. Both situations might mean that the public will want to cross private land, and must understand where public access is available and where landowner permission is needed	Include new policy
John Baynes	S68.236	SUB - Subdivision	SUB-O4	Oppose in part	The Council must state a commitment to recognize and protect highly productive land.	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.
John Baynes	S68.237	SUB - Subdivision	SUB-O5	Support in part	This objective should give effect to the purposes of esplanade reserve and esplanade strips as per s 229 of the Resource Management Act 1991. It is our view that public access requires landowner consent therefore the provision of public access in this objective should be removed.	Amend SUB-O5: Esplanade reserves and strips are created through subdivision for the purposes stated in section 229 of the Resource Management Act 1991. ~~to contribute to the protection of ecological values and cultural values, provide natural hazard mitigation, and provide for public access to and along rivers~~
John Baynes	S68.238	SUB - Subdivision	SUB-P8	Support	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Retain SUP-P8 as drafted.
John Baynes	S68.239	SUB - Subdivision	SUB-P13	Support in part	SFF fully supports the protection this policy gives to rural land and high value soils but the Council must state a commitment to also preserve high value soils.	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.
John Baynes	S68.240	SUB - Subdivision	SUB-R5	Support	SFF supports the inclusion of reverse sensitivity as a matter of discretion, as per the s 32 report: 'reserve sensitivity is a matter of discretion for subdivisions' (p.31).	Retain SUB-R5 as drafted.
John Baynes	S68.241	SUB - Subdivision	SUB-S1	Support in part	SFF supports increasing the minimum lot size in the rural zone to 8ha. In the interests of protecting highly productive land and ensuring that the district maintains suitably sized working farms, 8ha is a reasonable minimum lot size for the rural zone. We agree with the s 32 report which states that the current 2ha minimum lot size could result in 'the	Retain SUB-S1 as drafted.

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					loss of highly productive land and farmland available for primary production'.	
John Baynes	S68.242	EW - Earthworks	EW-P1	Support	Support is given for recognising the role (purpose) and character of a zone and the earthworks within it, meaning farming related earthworks in the rural zone should be considered appropriate and acceptable. While being in character with the surrounding land, the functionality of the earthworks is also important. Earthworks for farm tracking needs to be functional to allow safe passage across steep terrain. Visual effects must not take precedence over functionality.	Retain EW-P1 as notified.
John Baynes	S68.243	EW - Earthworks	EW-R1	Oppose	SFF finds this rule unnecessarily restrictive and is unsure why the Council is taking this approach to restrict fencing when the s 32 report provides no rationale. EW-R1 is inconsistent with rules elsewhere in the PDP, such as the NFL chapter. SFF suggest amendments to this rule which will allow farmers the ability to carry out land disturbance as required for fencing. Imposing restrictions on this, and therefore forcing farmers to apply for a resource consent, will disrupt farming operations.	Amend EW-R1 as below or exclude farm fences from this rule Land disturbance for the construction of fences Activity status: Permitted Where: ~~1. Any land disturbance does not exceed: (a) 1 metre in width for more than 10 metres in any 100 metre length; and/or (b) 1 metre in height or depth; and~~ 2. The ground is reinstated to original levels within 48 hours of work being completed. 3. The works are undertaken in accordance with Earthworks Standards EW-S3, EW-S5 and EW-S7. No other Earthworks Standards apply.
John Baynes	S68.244	EW - Earthworks	EW-R7	Support	Support is given for digging of dead holes and farm rubbish pits being a permitted activity	Retain EW-R7 as notified.
John Baynes	S68.245	EW - Earthworks	EW-R8	Support	Support is given for earthworks for silage pits being a permitted activity.	Retain EW-R8 as notified.
John Baynes	S68.246	EW - Earthworks	EW-S3	Oppose	SFF appreciates the need for some setbacks from rivers and streams for earthworks. However, as currently drafted, EW-S3 would limit earthworks for fencing which may be required for stock exclusion, drainage, including around waterways e.g. putting in drains, maintaining drains, replacing a culvert and pest control.	Amend EW-S3: Setbacks from rivers and streams 1. Earthworks (excluding earthworks required for farm fencing for stock exclusion, drainage, including around waterways or pest control) shall be set back the minimum distances from the top of the closest bank of a river or stream as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and 4); and (c) 5m for low order rivers or streams (order 1 and 2). Refer to Appendix 3 for river and stream orders
John Baynes	S68.247	LIGHT - Light	LIGHT-Overview	Support in part	The overview should also acknowledge that rural production is enabled by artificial outdoor lighting	Amend the Overview : Artificial outdoor lighting enables work, rural production , recreation and entertainment activities to occur beyond normal daylight hours.
John Baynes	S68.249	LIGHT - Light	LIGHT-O1	Support	Support is given to this objective which acknowledges activities can have a functional and operational requirement to use artificial light	Retain LIGHT-O1 as notified.
John Baynes	S68.250	LIGHT - Light	LIGHT-O2	Support in part	Objective O2 needs to consider the functional and operational requirements of primary production activities that need artificial light for normal seasonal tasks. Artificial outdoor lighting is crucial for some primary production activities (especially over the winter months when daylight hours are short - 8.5 hours).	Amend LIGHT-O2: Artificial outdoor lighting is located, designed and operated to maintain the character and amenity values within zones, including the enablement of rural production , and so that it does not adversely affect the health and safety of people, the natural life cycles of indigenous species and the safe operation of the transport network and views of the night sky.
John Baynes	S68.251	LIGHT - Light	LIGHT-Additional provisions sought	Not Stated	SFF believes the Council must also recognise and provide for the needs of its rural and/or primary production industry. There will be some parts of the year where farmers must work well past normal working hours to process their goods.	Include a policy that recognises and enables certain rural and primary activities may require artificial outdoor lighting outside normal working hours, under certain conditions, in order for its rural community to thrive in the District.
John Baynes	S68.252	NOISE - Noise	NOISE-O1	Support	This objective identifies that within different zones, different levels of noise will be appropriate.	Retain NOISE-O1 as notified.

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John Baynes	S68.253	NOISE - Noise	NOISE-O2	Support in part	Noise is an inherent part of rural activities, particularly in the rural zones. However, this objective does not anticipate the reverse sensitivity effects that may occur to adjacent zones, or to residential sites within the rural zones.	Amend NOISE-O2: Outside of reverse sensitivity exclusions in NOISE-O3 , activities do not generate noise effects which adversely affect amenity values, the health and wellbeing of people and communities.
John Baynes	S68.254	NOISE - Noise	NOISE-P2	Support in part	The RMA states a duty to avoid, remedy or mitigate adverse effects on the environment from activities. As such, the wording in NOISE-P2 should be updated to reflect this	Amend NOISE-P2: Ensure the health and wellbeing of people and the community is not adversely affected ~~protected~~ by (...)
John Baynes	S68.255	NOISE - Noise	NOISE - General	Support	NCCF supports Note 2: #9 which provides for an exemption for agriculture, horticulture and pastoral farming activities. However, it is suggested that audible bird scaring device' is included here, and a corresponding definition included.	Amend NOISE-Note 2 #9: 9. Noise from vehicles, machinery or equipment undertaking agricultural, horticultural and pastoral activities including noise from stock, other outdoor animals and working dogs, and audible bird scaring devices but excluding noise from stationary processing activities.
John Baynes	S68.256	Interpretation	Definitions	Support	With regards to Noise- Note 2; NCCF supports 'audible bird scaring device' being defined	Include a definition for 'audible bird scaring device' as: ' Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds '
John Baynes	S68.257	NOISE - Noise	NOISE-R8	Oppose	SFF seeks to have the Plan provide for the intermittent use of rural airstrips and helicopter landing areas for the purposes of agricultural aviation including primary production and conservation purposes as a permitted activity without limitations. This is the approach of the Selwyn District Council in their partially operation Selwyn District Plan. The existing District Plan does not specifically limit agricultural aviation, with it being covered by an exemption to the noise rules in 4.5.1 (2) (c) "activities of normal primary production or forestry activities" It is important to note that some agricultural aviation is in response to pests in crops and therefore the activity takes place with very little notice. Fertiliser spreading activities need to take place in appropriate weather windows which can be unpredictable. Timing is also important for some sprays to avoid negative impacts to bees.	Amend NOISE-R8: Activity status: Permitted ~~Where: 1. The take-off and landing is to and from a rural airstrip, a helicopter landing area located in the rural environment, or the Mandeville Aviation and Rail Precinct; 2. Take off and landings do not occur for more than 315 hours in any 12 month period; 3. The rural airstrip or helicopter landing area is separated by at least 500m from any notional boundary on a site not being serviced by the use of the airstrip; and 4. A record of take offs and landing times and dates is maintained and available to the Council upon request.~~
John Baynes	S68.258	SIGN - Signs	SIGN-Overview	Support in part	Signage can be used to identify farms in rural areas but does not necessarily advertise these businesses. An example is a dairy farm where signage is needed for tankers to identify the farm.	Amend overview: Signs contribute to the social, cultural, and economic well-being of the District by providing community, consumer, and destination information, safety messages, traffic controls, and the opportunity to advertise and identify businesses, products and services. Signage is an accepted part of the urban environment.
John Baynes	S68.259	SIGN - Signs	SIGN-S4	Oppose in part	Multiple signs are often in place on farms and may include security signage, health and safety signage, signage directing tankers and biosecurity signage.	Amend SIGN-S4: General Rural Zone 1. Any sign must: (a) be setback at least 1.5m from the road boundary; and (b) be at least 2.6 metres above the level of ground beneath the sign. 2. The sign must not be placed within 15m of any existing directional sign, where adjacent to and visible from a road reserve; 3. Maximum number of signs per site: five ~~one~~ ;—(...)
John Baynes	S68.260	TEMP - Temporary Activities	TEMP-R3	Support	TEMP-R3 does not cover storage or stacking of goods for farming purposes.	Amend TEMP-R3 to include cover storage or stacking of goods for farming purposes.
John Baynes	S68.261	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Support in part	In the Gore District, there are farmers whose families have been farming the land for many generations. They value their land and have developed an intergenerational culture which must	Amend Overview and Purpose: The purpose of the General Rural Zone is to provide for and protect rural production activities and other activities that rely on the rural resource. The General Rural Zone is the largest zone in the District and this land resource underpins the

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					be preserved alongside other cultural and historical aspects identified in the District Plan as of importance. SFF believes that heritage resources help to teach us about the past and the cultures of those who came before us, but we note that this seldomly appropriately reflects rural or pastoral heritage and culture as 'valued'. There is an opportunity as part of this process to celebrate the district's rural heritage and the history of our early pioneering farmers.	economic, ~~and social~~ and cultural well-being of the District.
John Baynes	S68.262	GRUZ - General Rural Zone	GRUZ-O1	Support in part	There is no objective that specifically enables rural production activities in the rural zones. There should be recognition of activities that are ancillary to primary production so that activities such as agricultural aviation are provided for. It is important to both 'recognise and provide for' activities. Cultural well-being is an important part of farmers' well-being as detailed in the comments on the overview.	Amend GRUZ-O1: Enable , recognise and provide for the importance of primary production, ancillary activities and rural industry to the social, ~~and economic~~ and cultural well-being of the District.
John Baynes	S68.263	GRUZ - General Rural Zone	GRUZ-O2	Support in part	Specific recognition of the impacts on primary production activities should be provided for.	Amend GRUZ-O2: The character and qualities of the General Rural zone comprise (...)4. high levels of rural amenity, including smells, noise and dust from ~~adjacent sites.~~ primary production activities.
John Baynes	S68.264	GRUZ - General Rural Zone	GRUZ-O3	Support	Non-primary production activities within the GRUZ are often important to farmers' social and economic well-being.	Retain GRUZ-O3 as notified.
John Baynes	S68.265	GRUZ - General Rural Zone	GRUZ-O4	Support	SFF supports the preservation of the purpose and character of the GRUZ.	Retain GRUZ-O4 as notified.
John Baynes	S68.266	GRUZ - General Rural Zone	GRUZ-O5	Support in part	It is important to acknowledge the importance of highly productive land for primary production for both current and future generations. The protection of highly productive land is crucial for ensuring economic well-being. The purpose of the Resource Management Act 1991 refers to well-being of 'future generations' (s 5), however the Local Government Act 2002 discusses 'current and future well-being' and enabling the promotion of the four well-being's of communities 'in the present and for the future' (s 10).	Amend GRUZ-O5: The value and long-term benefits of using highly productive land for primary production is recognised and the availability of highly productive land for primary production for current and future generations is protected.
John Baynes	S68.267	GRUZ - General Rural Zone	GRUZ-P1	Support	It is important for the district's social, cultural and economic well-being that primary production activities are enabled and supported.	Retain GRUZ-P1 as notified.
John Baynes	S68.268	GRUZ - General Rural Zone	GRUZ-P2	Support	It is appropriate to include a separate policy enabling rural industry activities.	Retain GRUZ-P2 as notified.
John Baynes	S68.269	GRUZ - General Rural Zone	GRUZ-P4	Support	It is important to recognise activities which provide benefits in the rural environment.	Retain GRUZ-P4 as notified.
John Baynes	S68.270	GRUZ - General Rural Zone	GRUZ-P5	Support	It is important to recognise the benefits of quarrying and mining, and their enablement in the rural environment.	Retain GRUZ-P5 as notified.
John Baynes	S68.271	GRUZ - General Rural Zone	GRUZ-P6	Support	SFF supports this policy.	Retain GRUZ-P6 as notified.
John Baynes	S68.272	GRUZ - General Rural Zone	GRUZ-P7	Support in part	SFF support the enablement of agricultural aviation activities and acknowledge the potential reverse sensitivity effects. However, as stated in comments	Amend GRUZ-P7: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities., ~~whilst managing the noise effects. through~~

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					on the NOISE chapter, SFF do not support limitations on agricultural aviation activities.	~~controlling the location of airstrips and scale of their use.~~
John Baynes	S68.273	GRUZ - General Rural Zone	GRUZ-P8	Support in part	'Rural production' as a term is not defined therefore it is recommended that 'primary production' is used for clarity. For farmers, it is important that some residential activity be permitted in the GRUZ for housing purposes (i.e., multiple dwellings provided for staff accommodation). However, it is crucial that primary production is still enabled and not compromised by development. Number 5 of this policy does not make sense as it is currently written and needs to be rephrased or removed, and a new policy created.	Amend GRUZ-P8: Enable residential activity where it: 1. does not compromise ~~rural~~ primary production; 2. is of a scale and location that does not compromise the rural character from any property or public place; and 3. can be suitably serviced, including provision for telecommunications; and 4. does not amount to rural lifestyle or urban development; ~~and 5. reverse sensitivity effects on and of adjacent land uses are appropriately avoided or mitigated.~~ Alternatively, include as a new policy GRUZ-P9: Reverse sensitivity effects on and of adjacent land uses are appropriately avoided or mitigated.
John Baynes	S68.274	GRUZ - General Rural Zone	GRUZ-P9	Support	It is important to provide for non-rural activities in the rural sector where these activities are related to, support or are compatible with rural activities.	Retain GRUZ-P9 as notified.
John Baynes	S68.275	GRUZ - General Rural Zone	GRUZ-P10	Support	Protection of highly productive land is supported.	Retain GRUZ-P10 as notified.
John Baynes	S68.276	GRUZ - General Rural Zone	GRUZ-P11	Support	SFF supports this policy as it ensures activities incompatible with the GRUZ are avoided, unless a clear need exists.	Retain GRUZ-P11 as notified.
John Baynes	S68.277	GRUZ - General Rural Zone	GRUZ-R3	Oppose in part	Under 3.9(1)(a) of the NPS-HPL, use or development of highly productive land is provided for unless at least one of the criteria listed under this clause is provided for. 'Supporting activities' is one such criteria, therefore quarrying activities for an existing farm quarry should be permitted	Amend GRUZ-R3: Activity status: Permitted Where (...) 3. The activity is not located on Highly Productive Land unless existing use rights apply ; and 4. The area is progressively stabilised, filled or recontoured; and (...)
John Baynes	S68.278	GRUZ - General Rural Zone	GRUZ-R5	Support	SFF supports this rule as it provides for woodlots as a permitted activity.	Retain GRUZ-R5 as notified.
John Baynes	S68.279	GRUZ - General Rural Zone	GRUZ-R9	Oppose in part	SFF does not believe the Council should restrict the staff numbers and hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule is unnecessary. As an example, a vet clinic may be required to operate outside of the hours of 0700 and 1900 due to an animal requiring care. There may be instances where a greater number of staff are required, for example an animal boarding facility during a busy period. These rules are over regulatory.	Amend GRUZ-R9: 1. The activity is a: (a) Vet Clinic, or (b) plant nursery, or (c) sale of on-site produce, or (d) Animal Boarding Activity; ~~and 2. Hours of operation for people visiting the site are between 0700 and 1900; and 3. A maximum of 12 staff are on-site at any one time;~~
John Baynes	S68.280	GRUZ - General Rural Zone	GRUZ-R10	Oppose in part	SFF does not believe the Council should restrict the staff numbers and hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule is unnecessary. An example is education/training for milking cows, would occur outside of the proposed hours of operation in the PDP.	Amend GRUZ-R10: Where: 1. The activity is a rural based education facility centred on agriculture sector training; ~~and 2. Hours of operation are between 0700 and 1900; and 3. A maximum of 12 people (staff and students) on-site at any one time;~~
John Baynes	S68.281	GRUZ - General Rural Zone	GRUZ-R12	Oppose in part	SFF does not believe the Council should restrict the hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule is unnecessary. A home business may operate at any hour of the day, as is the nature of online	Amend GRUZ-R12 to remove: ~~3. Hours of operation are limited to between the hours 0700 and 1900; and 4. Unloading or loading of vehicles or the receiving of customers or deliveries only occur between the 0700 and 1900.~~

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					businesses with international networks/customers. Furthermore, it is unnecessary to limit the time in which vehicles may be loaded or unloaded for a home businesses in a rural environment where disturbance is unlikely. This rule is over regulatory.	
John Baynes	S68.282	GRUZ - General Rural Zone	GRUZ-S1	Support in part	Primary production farms require multiple dwellings for staff accommodation often in close proximity to each other. Larger farms may have several individual minor residential units within close proximity. In farm succession situations, it is common for two generations to live in close proximity on the same site. SFF appreciates that controls are required for density but the standards also need to allow for additional support accommodation/housing. Additional residential units or minor residential units is a matter of discretion under this standard. However, it must be acknowledged that additional units may not always be required to support primary production as these could be required to house additional family members or live in staff (for example an Au Pair).	Amend GRUZ-S1: 3. There shall be a maximum density of ~~one~~ three minor residential units per site Matters of discretion: 1. The necessity of the additional residential unit or minor residential unit. ~~to support primary production.~~
John Baynes	S68.283	GRUZ - General Rural Zone	GRUZ-S4	Oppose in part	SFF requests an amendment to reduce the setback for buildings greater than 500 square metres. Buildings of this size are likely used for primary production and as such a 200m setback is unreasonable.	Amend GRUZ-S4: Any building is setback from any side or rear boundary the minimum distances as follows: 1. Residential buildings are setback 30m; 2. Dairy sheds and buildings that house animals are setback 50m; 3. Buildings greater than 500 square metres are setback ~~200~~ 50m , except for in the Rural Industry Precinct (PREC13) where the setback is 100m; 4. Buildings less than 10 square metres are setback 2m; and/or 5. All other buildings are setback 15m.
John Baynes	S68.284	GRUZ - General Rural Zone	GRUZ-S5	Oppose in part	SFF supports this standard but requests an update from the boundary of an intergenerational connector road.	Amend GRUZ-S5: Any building or structure is setback from any road boundary the minimum distances as follows: 1. Residential buildings are setback: (a) ~~100~~ 50m from the boundary of an Interregional Connector road (state highway); (b) 40m from the boundary of a Rural Connector road; (c) 30m from the road boundary of an unsealed road; and (...)
John Baynes	S68.285	GRUZ - General Rural Zone	GRUZ-S7	Oppose in part	As per earlier comments, farm fences must be excluded from setbacks.	Amend GRUZ-S7: 1. Any building or structure (not including farm fences) is set back from the top of the closest bank of any stream or river the minimum distance as follows:
John Baynes	S68.286	GRUZ - General Rural Zone	GRUZ-S8	Oppose	Generally, SFF does not support the inclusion of GRUZ-S8 Height. It may be useful for urban developments, where houses are clustered together, but it is not an appropriate or necessary measure in the rural zone.	Remove this standard or increase the maximum height across the entire Rural Zone to 15m.
John Baynes	S68.287	RLZ - Rural Lifestyle Zone	RLZ-Overview and Purpose	Support in part	SFF supports reference to ensuring that primary production activities can continue in the RLZ given the potential for reverse sensitivity in this area. However, the reference to 'sustainable' primary production is not needed and could change the meaning of 'primary production' activities (which are defined in the interpretation section). A key word search determined that this chapter is the only chapter in the plan referring to 'sustainable primary production' therefore we seek its removal. There is a typography issue that needs to be amended.	Amend Overview: The Rural Lifestyle Zone facilitates the aspirations of those wish to live there, within a setting that retains the overall rural character, while ensuring that ~~sustainable~~ primary production activities are not compromised. The precinct sits within the wider landscape setting of the Hokonui Hills Outstanding Natural Landscape, and the Croydon Bush Scenic Reserve, which also have landscape and biodiversity values.

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John Baynes	S68.288	RLZ - Rural Lifestyle Zone	RLZ-O2	Support in part	We suggest this objective is reworded as the intention is not clear.	Reword RLZ-O2.
John Baynes	S68.289	RLZ - Rural Lifestyle Zone	RLZ-P3	Support in part	If activities are not compatible with the amenity and value of the zone then consent will not be granted, therefore it seems unnecessary to state this here. Furthermore, RLZ-P4 provides for 'compatible activities'.	Amend RLZ-P3: Enable primary production activities within the Rural Lifestyle Zone. ~~where they are compatible with the amenity and values of those zones.~~
John Baynes	S68.290	RLZ - Rural Lifestyle Zone	RLZ-P6	Support in part	Emergency service facilities, such as rural fire, are crucial for farmers and therefore the Plan should do more than to simply 'recognise the benefit'.	Amend RLZ-P6: ~~Recognise the benefit~~ Enable the location of emergency services facilities and of education facilities, whilst ensuring any such facility is of a location, nature and scale that does not detract from the rural character and amenity values of the Rural Lifestyle area.
John Baynes	S68.291	RLZ - Rural Lifestyle Zone	RLZ-P9	Support in part	The word 'generally' does not add value to this policy. Farms located in the RLZ must be enabled to continue normal farming operations.	Amend RLZ-P9: Recognise that some Rural Lifestyle Zoned sites are working farms, and activities such as primary production and agriculture aviation activities are ~~generally~~ appropriate.
John Baynes	S68.292	RLZ - Rural Lifestyle Zone	RLZ-PREC11-P1	Support in part	Typo to be amended.	Amend RLZ-PREC11-P1L: Limited the nature, scale and design of development within PREC11 in order to protect the landscape values of the Hokonui Hills Rural Lifestyle Precinct and the nearby Hokonui Hills Outstanding Natural Landscape and Croydon Bush Scenic Reserve from inappropriate development
John Baynes	S68.293	RLZ - Rural Lifestyle Zone	RLZ-R3	Support in part	The maximum occupancy prescribed by this rule is 5 persons. This is overly restrictive as a homestay in a rural environment is unlikely to cause adverse effects. Furthermore, 5 persons is an odd number as it does not allow for multiple couples. Farmstays may offer a homestay as part of their business and this rule must accommodate for this. If a fourbedroom hours is utilised as a homestay there could be three bedrooms available, sleeping six people. Allowing for eight people would adequately capture a farmstay.	Amend RLZ-R3: 3. The maximum occupancy does not exceed ~~5~~ 8 persons.
John Baynes	S68.294	RLZ - Rural Lifestyle Zone	RLZ-R5	Support in part	This rule permits primary production where the activity does not involve: (a) intensive indoor primary production, or (b) milking sheds, or (c) buildings used to house or feed milk stock, or (d) stock effluent holding tanks, or (e) treatment or storage ponds, or (f) winter grazing, or (g) quarry or quarrying activities, or (h) mining. SFF agrees with this list as it is important to minimise reverse sensitivity effects, however protecting existing use is also important and therefore the Council should add this as a matter of discretion. 'Winter grazing' as a term is not defined and does not provide for people in the RLZ having a couple of animals such as sheep for grazing. It is recommended that a definition for 'intensive winter grazing' is included to align with the Southland Land and Water Plan.	Amend RLZ-R5: Primary Production Activity status: Permitted Where: (...) (e) treatment or storage ponds, or (f) intensive winter grazing, or (g) quarry or quarrying activities, or (...) Matters of discretion: 1. The matters of discretion of any infringed standard 2. Existing use rights
John Baynes	S68.295	RLZ - Rural Lifestyle Zone	RLZ-R6	Support in part	We support this rule provided our changes under GRUZ-S8 are accepted.	Adopt RLZ-R6 as notified, pertaining to changes being accepted under GRUZS8.
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	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

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					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	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	S68.297	Natural environmental Values map layers	ECO-MAP-Significant Natural Area	Not Stated	The definition of a SNA as per the NPS-IB states 'any area that, after the commencement date, is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1'. Therefore, until the identification is carried out notification or inclusion in the plan takes place, the unmapped areas should not be treated as SNAs. In the development of the Council's Long-Term Plan, the Council should look to provide financial assistance or rates rebates/remission for ratepayers with identified SNAs. We support nonregulatory approaches to managing SNAs and would be happy to work with the Council and our members to achieve thisThere is a real risk of a perverse effect that SNAs will become something farmers are motivated to avoid having on their property. For instance, if there are significant costs and restrictions associated with SNAs, they will become a liability instead of something to be proud of. This will have implications for biodiversity, and farmers may choose to plant exotic species for artificial wetlands, shelterbelts or stock shade trees etc, which encourage a habitat for non-indigenous fauna, instead of being encouraged to choose indigenous species.	SFF does not agree with including areas that have not been mapped as SNAs. It is our view that until areas are mapped and included in the plan, they should not be considered SNAs.
John Baynes	S68.298	ECO - Ecosystems and Indigenous Biodiversity	ECO - General	Not Stated	Lack of consultation on the Ecosystems and Indigenous Biodiversity chapter and the Natural Features and Landscapes chapters	We note that the Council did not include these chapters in the early consultation on the exposure draft. We believe these chapters need to be removed and rewritten with a more practical and enabling approach
John Baynes	S68.299	NFL - Natural Features and Landscapes	NFL - General	Not Stated	Lack of consultation on the Ecosystems and Indigenous Biodiversity chapter and the Natural Features and Landscapes chapters	We note that the Council did not include these chapters in the early consultation on the exposure draft. We believe these chapters need to be removed and rewritten with a more practical and enabling approach
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	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.

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					developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	
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
John Baynes	S68.303	Interpretation	quarrying activities	Support in part	Although there is a separate definition for farm quarries, they need to be clearly excluded from the definition of 'quarrying activities'.	Amend definition to include below and make any consequential amendments: This definition does not include 'farm quarries'.
John Baynes	S68.304	NOISE - Noise	NOISE-P4	Support in part	Aviation activities that are infrequent should be added to the list of activities in NOISE-P4 so that there is recognition that such activities are provided for.	Amend NOISE-P4:Enable the infrequent noise levels associated with temporary activities, temporary aviation activities , temporary military training activities and emergency services training activities provided that the level, timing and duration of noise is reasonable.
John Baynes	S68.305	GRUZ - General Rural Zone	GRUZ-R11	Oppose in part	The maximum occupancy prescribed by this rule is 5 persons. This is overly restrictive as a homestay in a rural environment is unlikely to cause adverse effects. Furthermore, 5 persons is an odd number as it does not allow for multiple couples. Farmstays may offer a homestay as part of their business and this rule must accommodate for this. If a four bedroom house is utilised as a homestay there could be three bedrooms available, sleeping six people. Allowing for eight people would adequately capture a farmstay.	Amend GRUZ-R11:2. The maximum occupancy does not exceed ~~5~~ 8 persons.
John Sheddan	S84.001	Zone map layers	RLZ-MAP	Oppose in part	The nature and use of properties on Racecourse Road is residential in nature and not in keeping with the Rural Lifestyle Zone. The proposed zoning does not provide protection or benefit to current land use.	Inclusion of the Racecourse Road area into the Lifestyle Rural Zone.
John Sheddan	S84.002	HH - Historical Heritage	HH-P2	Oppose	Owners feel unfairly burdened by the maintenance requirements and associated costs imposed without consultation or review. Changing a building's status without owner input and subsequently shifting costs creates an unreasonable situation hindering development prospects for Gore. Some of the buildings chosen do not hold sufficient historical or social significance which have been arbitrarily attributed to them, for many the historical nature and original function of the buildings have not been maintained or modifications have negated these historical benefits.	A formal review of buildings, their condition, and the significance of them needs to be completed, not arbitrary nomination by Council appointees.