

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
Ravensdown Limited	S28.001	Zone map layers	GIZ-MAP	Amend	Seeking consistent General Industrial Zoning across the site to reflect and recognise its overall industrial use. Section 1 SO 12143 has been fragmented from the 'General Rural' zone limiting its practical use for primary production and would be logical to extend the 'General Industrial' zone in this area. The rezoning would streamline consenting processes for any future industrial developments.	Rezone 1.4160ha of Ravensdown owned land (legally described as Section 1SO 12143) from 'General Rural' to 'General Industrial'.
Ravensdown Limited	S28.002	Interpretation	agricultural aviation activity	Support	The submitter supports the definition of Agricultural aviation activity as it covers the appropriate scope.	Retain the definition.
Ravensdown Limited	S28.003	NOISE – Noise	NOISE-O1	Support	The submitter and NZAAA supports an objective that recognises and provides for activities that generate noise compatible with the purpose and character of the zone. This is particularly relevant to the General Rural Zone and needs to recognise that it is not a ‘quiet’ environment.	Retain the objective.
Ravensdown Limited	S28.004	NOISE – Noise	NOISE-O2	Support	The submitter supports NOISE-O2 as it allows noise generation, though not of a level that is unreasonable which adversely affects people.	Retain the objective.
Ravensdown Limited	S28.005	NOISE – Noise	NOISE-P2	Support in part	It is inconsistent with NOISE-O2, which refers to people being 'adversely affected'.	Amend Ensure the health and wellbeing of people and community is not adversely affected ~~protected~~ by managing noise effects generated by an activity having regard to:
Ravensdown Limited	S28.006	NOISE – Noise	NOISE-P4	Support in part	Infrequent aviation activities should be added to the list of activities in NOISE-P4 so there is recognition that such activities are provided for.	Amend To enable the infrequent noise levels associated with temporary activities, temporary aviation activities , temporary military training activities and emergency training activities provided that the level, timing and duration of noise is reasonable.
Ravensdown Limited	S28.007	NOISE – Noise	NOISE-R8	Support in part	The submitter NZAAA supports the intent to enable agricultural aviation activities but seeks amendments. br /Note 2 exempts takeoff and landings from Mandeville Aviation and Rail Precinct so should not be included in clause 1. br /An aircraft may have flown in from an airport to commence the activity, therefore the wording should be 'or' not 'and'. br /The reference to the number of hours should be ‘aircraft’ hours to prevent ambiguity.br /Clause 3 – setbacks- is not justified by the s32 Report and is inconsistent with NOISE-P2. br /Clause 4 is problematic as it does not state who should keep the records. br /4.5 of the Section 32 Noise report provides analysis of how other councils are addressing the same issues. The analysis does not support the provisions in NOISE-R8 namely: Condition 3. for a 500 m setback from any notional boundary on a site not being serviced by the use of the airstrip.	Amend: 1. The take-off and landing is to ~~and~~ or from a rural airstrip, a helicopter landing areas located in the rural environment ~~or the Mandeville Aviation and rail Precinct~~ . 2. Take off and landing do not occur for more than 315 aircraft hours in any 12 month period. 3. Delete 4. A record of take offs and landing times and dates is maintained by the landholder and available to the Council upon request.
Ravensdown Limited	S28.008	NOISE – Noise	NOISE-R8	Support in part	The Selwyn District Council Operative Plan (Decisions Version August 19th, 2023) is relevant to the Gore PDP rule NOISE-R8 for the	NZAAA, and Ravensdown, seek to have the provisions of the Selwyn District Council Decisions rule considered which states:

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					INTERMITTENT use of Rural Airstrips or Helicopter Landing Areas but does not impose setback distances.br /The New Plymouth (PNPDP notified appeals version 13th May 2023) provides for agricultural aviation through a noise exemption which is enabling of agricultural aviation therefore is not relevant.br /The Clutha District Council Operative Plan 1998 relates to airstrips and helicopter landing pads that are used on a regular basis therefore is not relevant.br /br /NZAAA, and therefore Ravensdown, accepts that a limitation of 315 aircraft hours in a calendar year from a rural airstrip or helicopter landing area is adequate for the provision of services to support primary production.br /br /Agricultural fixed wing and helicopter operators historically, and currently, conduct take offs and landings from at least 34 rural airstrips and helicopter landing areas located within 500m of a notional boundary. A 500m setback will result in take offs and landing being undertaken from airstrips and helicopter landing areas further away from the treatment areas increasing aircraft time, increasing cost to the primary production sector and increasing the overall duration of noise. (noting that the council controls land use - once the aircraft is airborne it can operate right up to a notional boundary whilst complying with the Civil Rules).br /br /	"Aircraft and Helicopter Movements Ancillary to Rural Production Permitted activity where: 1. Aircraft movements and helicopter movements associated with purposes ancillary to rural production including topdressing, spraying, stock management, fertiliser application, and frost mitigation, including the incidental landing and take-off of helicopters during their normal course of operation."
Ravensdown Limited	S28.009	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Support in part	There should be explicit recognition of the need to avoid potential reverse sensitivity effects.	Amend paragraph 4: Rural lifestyle, settlement and urban expansion is not promoted in the General Rural zone to avoid un-coordinated development and fragmentation of the rural resource and avoid potential reverse sensitivity effects.
Ravensdown Limited	S28.010	GRUZ - General Rural Zone	GRUZ-O1	Support in part	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.	Amend: Recognise and provide for the importance of primary production and ancillary activities and rural industry to the social and economic wellbeing of the district
Ravensdown Limited	S28.011	GRUZ - General Rural Zone	GRUZ-O2	Support in part	Needs to have clear recognition in the description of the character and qualities of the zone that effects such as noise, odour and dust do occur as part of primary production activities. It is important that these are included in the description of the zone.br /High levels of rural amenity from adjacent sites are not clear and it is encompassed in the descriptions so should be deleted.	Amend: Delete clause 4. Add an additional clause: Smells, noise, dust from primary production activities
Ravensdown Limited	S28.012	GRUZ - General Rural Zone	GRUZ-O3	Support in part	The objective should identify the key criteria for locating in the GRUZ- the functional or operational need. br /As currently written the objective is more of a method, not an objective, as it stipulates how it may be achieved.	Amend Non-primary production activities that support primary production or rely on a rural location or have a functional or operational need to locate in the General Rural Zone are provided for. ~~While managing the nature, scale and location of activities.~~

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Ravensdown Limited	S28.013	GRUZ - General Rural Zone	GRUZ-P2	Support in part	Rural character is a subset of amenity, unnecessary to include both in the policy. Rural character should be maintained, not preserved, as it is not a s6 matter and is a dynamic environment which does change over time. br /The policy should seek to manage the nature, scale and location of such activities, rather than a presumption of limitation.	Amend Enable rural industry activities whilst ~~preserving~~ retaining rural character, rural amenity and underlying Ngai Tahu relationships with the natural environment and productive capacity of the rural zone by ~~limiting~~ managing the nature, scale and location of such activities.
Ravensdown Limited	S28.014	GRUZ - General Rural Zone	GRUZ-P7	Support in part	The submitter supports GRUZ-P7. However, noise effects are managed in the noise chapter and is more consistent with an ‘enabling’ policy if this part is deleted.	Amend: Enable agricultural aviation activities and rural airstrips and helicopter landing areas to support primary production and conservation activities ~~whilst managing the noise effects through controlling the location of airstrips and scope of their use~~
Ravensdown Limited	S28.015	GRUZ - General Rural Zone	GRUZ-R6	Support	The submitter and NZAAA GRUZ-RG. This includes weed and pest control undertaken by aircraft.	Retain GRUZ-R6.
Ravensdown Limited	S28.016	GRUZ - General Rural Zone	GRUZ-R16	Support in part	Any setbacks, as proposed GRUZ-S9, do not enable the provision of services to support primary production (reasons in submission point NOISE-R8) therefore the reference to GRUZ-S9 in GRUZ-R16.1 should be deleted.	Amend GRUZ-R16: 1. The takeoff and landings are to or from a rural airstrip or helicopter landing area ~~which complies with GRUZ standard GRZ-S9~~ 2. Retain GRUZ-R16 2. (subject to the amendments sought in submission point S1.6 NOISE-R8) Amend default activity status to restricted discretionary. Add matters of discretion: 1. Any mitigation of noise proposed in accordance with best practicable options 2. Hours of operation.
Ravensdown Limited	S28.017	GRUZ - General Rural Zone	GRUZ-S9	Oppose	Any setbacks as proposed do not enable the provision of services to support primary production (reasons in submission point NOISE R8) and are not justified by the s32 Report. br /Council controls land use, not aircraft in flight and is inappropriate to include inflight horizontal setbacks as proposed.	Delete GRUZ-S9
Ravensdown Limited	S28.018	RLZ – Rural Lifestyle Zone	RLZ-R6	Oppose in part		Delete RLZ-R6 1. Retain RLZ-R6 2. (subject to the amendments sought in submission point S28.07/08 to NOISE-R8)
Ravensdown Limited	S28.019	RLZ – Rural Lifestyle Zone	RLZ-S8	Oppose	The setbacks proposed do not enable the provision of services to support primary production (refer reasons in submission point NOISE R8- 07/08) and are not justified by the s32 Report. Council controls land use and not aircraft in flight. It is inappropriate to include inflight horizontal setbacks as proposed.	Delete RLZ-S8
Reaby Downs Farm Ltd	S18.001	NFL – Natural Features and Landscapes	NFL - General	Oppose in part	Adopts submission points within Appendix A of Stoney Creek's submission. Considers there is a lack of evidence for the mapped extent of the Hokonui Hills ONL and Plan provisions. Concerned that limits on development potential are not proportionate to the potential environmental effects. The provisions do not recognise the benefits of farming activities which have low environmental effects.	Seeks the relief sought within the Stoney Creek submission
Reaby Downs Farm Ltd	S18.002	ECO – Ecosystems and Indigenous	ECO - General	Oppose	Considers that the blanket protections do not provide sufficient ability for pastoral farming practices such as fencing and vegetation	Seeks the relief sought within the Stoney Creek submission

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		Biodiversity			clearance for farm tracks to be undertaken without resource consent.	
Reaby Downs Farm Ltd	S18.003	SASM - Sites and Areas of Significance to Māori	SASM - General	Oppose	Identifying the whole district as SASM may unnecessarily require consent and consultation for day-to-day farm activities, increasing time, cost and workload. As objectives and policies regarding Ngāi Tahu values have been incorporated into the plan, there is no justification for the entire district to be a SASM. The SASM chapter should instead provide further clarity to plan users by identifying and delineating those specific sites, areas and landscapes that are significant to Māori. Similar approaches have been undertaken in other recently reviewed district plans.	Sites and Areas of Significance to Māori are identified and mapped in the planning maps through a transparent, consistent process..
Reaby Downs Farm Ltd	S18.004	SASM - Sites and Areas of Significance to Māori	SASM-O1	Oppose	Stoney Creek is concerned that the broad-brush approach within the PGDP creates uncertainty for plan users as to what activities require consultation with mana whenua and could increase time, cost and workload of day-to-day farm activities. The approach creates disproportionate onus on applicants and is also unclear what “appropriate considerations” (as referred to in Objective SASM-O1) may be. The SASM chapter should provide further clarity by identifying and delineating those specific sites.	Amend SASM-O1 to read: ~~All~~ Those lands, waterbodies, natural features, and marae within Gore District identified as Sites of Significance to Māori in the Planning Maps are recognised as sites and areas of cultural significance to mana whenua and/or tangata whenua, and are afforded appropriate considerations with regard to the cultural values identified in MW-2.3 in relation to their management, development, and use.
Reaby Downs Farm Ltd	S18.005	SASM - Sites and Areas of Significance to Māori	SASM-P1	Oppose	Stoney Creek requests that existing activities are provided for in accordance with s10 of the RMA.	Amend SASM-P1 to read: New Use, subdivision, and development is enabled where adverse effects on the Ngāi Tahu cultural values, including those listed in MW-2.3, are avoided, remedied or mitigated. Council shall have regard to any other benefits (e.g. pest control) provided by the proposed activity.
Reaby Downs Farm Ltd	S18.006	SASM - Sites and Areas of Significance to Māori	SASM-P2	Oppose	Amendments are suggested to align with the concerns raised with regard to SASM-O1	Amend SASM-P2 to read: The impact of proposed activities on Sites of Significance to Māori as identified in the Planning Maps on the Ngāi Tahu cultural values identified in MW-2.3, and their underlying relationship with the natural environment is determined in partnership with Hokonui Rūnanga and takes into account any benefits of the proposal.
Reaby Downs Farm Ltd	S18.007	ECO – Ecosystems and Indigenous Biodiversity	ECO-O1	Oppose	Stoney Creek supports the alignment NPSIB and requests that this objective reflect the wording contained within the NPSIB. The use of 'significant indigenous vegetation' and 'significant habitats of indigenous fauna' is unclear.	Amend ECO-O1 to read: Maintain Indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna ~~(Significant Natural Areas).~~ through the identification of Significant Natural Areas.
Reaby Downs Farm Ltd	S18.008	ECO – Ecosystems and Indigenous Biodiversity	ECO-O3	Oppose	The wording of this policy is more stringent than the NPSIB as it requires the “enhancement” of values. Amend wording to align with NPSIB.	Amend ECO-O3 to read: Provide for ~~appropriate~~ new subdivision, use and development within and adjacent to Significant Natural Areas where adverse effects on the values of the area can be avoided or managed. ~~maintained and enhanced.~~
Reaby Downs Farm Ltd	S18.009	ECO – Ecosystem	ECO-P2	Oppose	Existing activities within or affecting SNAs are provided for in Policy 9 and Clause 3.15 of the	Amend ECO-P2 to read: ~~Allow~~ Enable activities within or affecting Significant Natural Areas that may impact the extent

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		s and Indigenous Biodiversity			NPSIB. Amend wording to better align with the NPSIB objectives.	~~or ecological integrity of the SNA indigenous biodiversity values~~ where: 1. ~~This 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 ...
Reaby Downs Farm Ltd	S18.010	ECO – Ecosystems and Indigenous Biodiversity	ECO-P3	Amend	Stoney Creek supports the alignment of the PGDP objectives and policies with the wording of the NPSIB which allows for new subdivision, use or development where this is required to address a high risk to public health or safety.	Amend ECO-P3 to read: Any new subdivision, use, or development shall avoid adverse effects on an SNA that result in:1. loss of ecosystem representation and extent; ... Unless: 6A. The activity is required to address a high risk to public health or safety. or: The activity relates to: ~~Unless they relate to:~~ ... 6. Construction of specified infrastructure that provides significant national or regional public benefit; 7. Mineral and aggregate extraction that provides significant national public benefit that could not otherwise be achieved using resource in New Zealand;
Reaby Downs Farm Ltd	S18.011	ECO – Ecosystems and Indigenous Biodiversity	ECO-P8	Oppose	ECO-P8 has a different set of criteria to the NPSIB. Managing effects on indigenous biodiversity outside of SNAs by applying the effects management hierarchy would be in line with the NPSIB.	Preferred relief: Withdraw ECO-P8 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised policy balanced provisions recognising that some vegetation removal is necessary and providing for this where effects are managed using the effects management hierarchy. Alternative relief: Amend Policy ECO-P8 to read: When assessing consents for subdivision, land use and development outside of SNAs, require applicants to demonstrate that effects on indigenous biodiversity will be managed by applying the effects management hierarchy. , avoid effects which will: 1. Prevent an indigenous species or community being able to persist in their habitats in the ecological district; 2. Result in a degradation of the threat status, further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the ecological district level; 3. Result in a reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1—3a—nationally critical, nationally endangered and nationally vulnerable; and 4. discourage mana whenua access to indigenous biodiversity for a mana whenua cultural purpose
Reaby Downs Farm Ltd	S18.012	ECO – Ecosystems and Indigenous Biodiversity	ECO-P9	Oppose	ECO-P9 gives no weight to existing activities but should reflect that there may be lawfully established activities within or affecting SNAs that may require resource consent but do not have adverse effects on ecological values and may provide benefits such as pest control. ECP-P9 Point 8 refers to ECO-P7 for offsetting, however ECO-P7 does not refer to offsetting.	Amend ECO-P9 to read: When assessing resource consents in Significant Natural Areas, consider the following matters: ... 5. The effects the activity may have on the introduction, ~~or~~ spread or control of exotic pest plant and animal weed -species and pest animals both terrestrial and aquatic; ... 8. The appropriateness and effectiveness of any biodiversity offsetting or compensation ~~in accordance with ECO—P7~~ to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied. 9. Whether the activity is a lawfully established existing activity that is no grater in intensity, scale or

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						character and will not result in a loss of extent or degradation of ecological integrity of a SNA.
Reaby Downs Farm Ltd	S18.013	ECO – Ecosystems and Indigenous Biodiversity	ECO-P10	Amend	Stoney Creek supports the recognition of the benefits farmers provide in the management of indigenous biodiversity but wish to better recognise the extent of benefits. Clause 6 of ECO-P10 encouraging the provision of free ecological surveys, financial support and rates remissions for SNA landholders is supported.	Amend ECO-P10 to read: Maintain indigenous biodiversity across the district by: ... 8. Recognising the benefits of farm management practices and active management of indigenous biodiversity, including but not limited to voluntary animal and plant pest and stock control, fencing , and/or formal legal protection. ...
Reaby Downs Farm Ltd	S18.014	ECO – Ecosystems and Indigenous Biodiversity	ECO-P11	Oppose	There may be situations where offsetting is appropriate but is not for cultural purposes or is consistent with other values or drivers.	Preferred relief: Withdraw ECO-P11 and redraft in consultation with key stakeholders, including Stony Creek Station. Alternative relief: Amend Policy-P11 as follows: Provide for biodiversity offsets and compensation to manage residual adverse effects of an activity where: 1. The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity of similar species and location where practicable; or 2. The conservation outcomes are measurable and positive; and 3. The biodiversity offsets or compensation are in accordance with best practice, including but not limited to New Zealand Government guidance on biodiversity offsetting.; and ~~4. Off setting and compensation packages are consistent with Ngāi Tahu cultural purposes~~
Reaby Downs Farm Ltd	S18.015	ECO – Ecosystems and Indigenous Biodiversity	ECO-R1	Oppose	Stoney Creek supports Indigenous Vegetation Clearance and Land Disturbance rules but finds Rule ECO-R1 too restrictive, especially for fencing. The rule's broad definition of "Land Disturbance" raises confusion, as it encompasses all land activities without clarification. The permitted width for disturbance is impractical for installing fences, it does not allow for access and maintenance. The rule lacks provisions for upgrading existing structures, which may have better environmental outcomes and should be enabled. Maintenance of improved pasture under ECO-R1(e) is more restrictive than NPSIB. The inclusion of a permitted activity rule for the incidental removal of indigenous species during exotic species control is supported but should be clarified in the rule. There should be no limits around the removal of deliberately planted vegetation. A restricted discretionary status would be more appropriate for minor environmental effects. Non-complying activity status for indigenous vegetation removal for those activities listed in ECO-R1(1) where this falls within a SNA does not acknowledge the presence of existing activities within SNAs (as allowed for under the NPSIB). Therefore, Discretionary activity status is proposed for these activities.	Preferred Relief: Withdraw ECO-R1 and redraft in consultation with key stakeholders, including Stony Creek Station. Include in the revised rule an exemption for indigenous vegetation removal and land disturbance associated with farming activities within the new Hokonui Hills Special Precinct (discussed further below). Alternative relief: Amend ECO-R1 as follows: Indigenous Vegetation Clearance and Land Disturbance associated with Indigenous Vegetation Clearance Activity status: Permitted 1. It is necessary for the following purposes: (aa) The installation, maintenance, repair, replacement or upgrade of: (i) Fences (ii) Farm tracks (iii) Farm infrastructure [Refer to proposed definition] (a) The maintenance, repair, or replacement or upgrade of existing lawfully established: ~~(i) fences,~~ (ii) vehicle tracks, (iii) roads, (iv) infrastructure, (v) walkways, (vi) firebreaks, (vii) dams, (viii) waterway crossings, or (ix) network utilities, ~~and the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i), and (vi)...~~ (e) Maintenance of improved pasture outside of a SNA, where: (i) the improved pasture has not become a SNA, and (ii) the land is not an uncultivated depositional landform, and (iii) it will not adversely affect a Threatened or At Risk (declining) species. (f) In accordance with an approved Reserve Act or Conservation Act reserve management plan. (g) For the maintenance, repair or replacement of existing buildings and structures, or to remove a potential fire risk, including an area no further than ~~2.0m~~ 7.5m from the exterior wall of an existing building. (h) The removal indigenous vegetation that is

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						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 discretionaryWhere: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 DiscretionaryMatters 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.emNOTE - the 1.5m limit for vegetation clearance and land disturbance associated with fences ECO-R1 was withdrawn by Council resolution on 21 November 2023/em
Reaby Downs Farm Ltd	S18.016	ECO – Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	indigenous vegetation clearance and land disturbance for any purpose other than those listed in ECO-R1(1) is a discretionary activity and there are instances where this is too restrictive. There's no provision for removing regenerating vegetation in areas lawfully cleared before. A proposed new rule aims to grant permitted activity status for minor vegetation clearance.	Add a new Rule ECO-R1(2): 2. Indigenous Vegetation Clearance and any associated land disturbance outside a SNA for any purpose other than listed in ECO-R1(1) or ECO-R1(3), provided:(a) The vegetation to be cleared is regenerating indigenous vegetation less than 15 years old, where the land was previously lawfully cleared of indigenous vegetation; or(b) The area of indigenous vegetation clearance does not exceed 500 m2 in any 12 month period.
Reaby Downs Farm Ltd	S18.017	ECO – Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Support	The maintenance of improved pasture within or adjacent to a SNA is provided for in the NPSIB, but this is not reflected in the PGDP rule framework.	Add a new Rule ECO-R1(3): Indigenous vegetation clearance and any associated land disturbance required for the maintenance of improved pasture within or affecting a SNA where: (i) the maintenance of improved pasture is part of a regular cycle of periodic maintenance, and (ii) the intensity, scale or character of the effects are not increased, and (iii) the improved pasture has not itself become a SNA, and (iv) the land is not an uncultivated depositional landform, and (v) the maintenance will not adversely affect a Threatened or At Risk (declining) species.
Reaby Downs Farm Ltd	S18.018	NFL – Natural Features and Landscapes	NFL - General	Oppose	As drafted, the ONL chapter is fundamentally flawed as it fails to acknowledge the established presence of pastoral farming within mapped ONL areas and would significantly restrict farming activities. There seems to be no justification for this as comments in the S32 seem to contradict the change. Considers the evaluation and assessment in the report insufficient. The rule framework is overly restrictive particularly when the policy framework acknowledges the presence and benefits provided by existing pastoral farming within the Hokonui Hills ONL which, by GDC's	Preferred Relief: Withdraw the Natural Features and Landscapes chapter in its entirety and redraft in consultation with key stakeholders, including Stony Creek Station.Stony Creek Station considers that an appropriate resolution would be to create a Hokonui Hills Special Precinct, within which rural activities associated with pastoral farming are permitted, with appropriate and practical limits set. The provisions of the other chapters of the PGDP would not apply to farming activities within the Hokonui Hills Special Precinct

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					own assessment, has not resulted in significant adverse effects under the current framework.	
Reaby Downs Farm Ltd	S18.019	NFL – Natural Features and Landscapes	NFL-P1	Oppose	Inclusion of policies that recognise pastoral farming within ONLs but considers NFL-P1 does not go far enough to recognise the benefits of pastoral farming.	Amend NFL-P1 to read: Avoid adverse effects on the values and characteristics of identified outstanding natural features and landscapes described within Appendix 5 by: ... 2. Recognising the benefits provided by existing ~~existence of~~ working pastoral farms and their contribution to the openness and landform legibility of outstanding natural features and landscapes;
Reaby Downs Farm Ltd	S18.020	NFL – Natural Features and Landscapes	NFL-P4	Oppose	When assessing resource consents within the ONL, it is important to recognise the presence of existing activities within these areas.	Amend NFL-P4 to read: When assessing resource consents within Outstanding Natural Features and Landscapes, consider the following matters; ... 4. The presence of existing activities within the ONL and whether the activity is changing in intensity, scale or character.
Reaby Downs Farm Ltd	S18.021	NFL – Natural Features and Landscapes	NFL - General	Amend	The Rule table within the NFL chapter states that the rules are applicable in “All zones”. This is misleading as the rules only apply within an identified ONL or ONF.	Amend “All zones” under rules NFL-R1 to NFL-R8 to read “All areas identified as ONL/ONF in the Planning Maps”.
Reaby Downs Farm Ltd	S18.022	NFL – Natural Features and Landscapes	NFL-R1	Oppose	The increased number of activities controlled in the Hokonui Hills ONL contradicts the comments made in the S32 report and there is seemingly no justification for the increase. The findings of the report are disputed, including the cost benefit analysis. Considers the rule framework overly restrictive and that it contradicts the policy framework which acknowledges the presence and benefits of pastoral farming, especially as the existing provision has not resulted in significant adverse effects.	Amend NFL-R1 to read: Activity status: PermittedWhere: 1. The building or structure is for farming purposes; ~~excluding residential use;~~ (a) Does not exceed 500 30m 2 in area; and (b) Height shall not exceed 8 3m ; 2. Buildings or structures for non-farming purposes; (a) The maximum height does not exceed 2m; and (b) The maximum gross floor area is no more than 5m2 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%
Reaby Downs Farm Ltd	S18.023	NFL – Natural Features and Landscapes	NFL-R2	Amend	Supportive of permitted status for tree planting but it is not appropriate to limit this for certain purposes as this may discourage further planting e.g. where non-indigenous species may be required for wind breaks, shelter belts etc.	Amend NFL-R2 to read:Tree planting, other than plantation forestry within an identified ONF/L Activity status: Permitted Where: 1. The tree planting is of indigenous species or 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. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3. 3. Any benefits provided by the proposed tree planting.
Reaby Downs Farm Ltd	S18.024	NFL – Natural Features and Landscapes	NFL-R3	Oppose	S32 report states the operative plan controls were effective at managing activities within ONLs. As such, additional controls in the PGDP are not supported and should align more with the controls that exist currently.	Amend Rule NFL-R3 to read: Land disturbance and earthworks within an identified ONF/L Activity status: Permitted Where: X. Required for cultivation, fencing or pest plant management; or X. Associated with the construction of any road or track no greater than 7 metres in width or requiring more than 2 metres of cut or fill for a total distance greater than 100 metres; or X. The earthworks do not exceed 100 linear metres in any direction; and 1. The depth of the earthworks shall not exceed 1m-2m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~1m-3m~~ above the original surface of the ground; and 3. the area of the earthworks shall not

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						exceed 100m2 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.
Reaby Downs Farm Ltd	S18.025	NFL – Natural Features and Landscapes	NFL-R4	Oppose	Supportive of permitted activity status that allows earthworks to maintain existing facilities within an ONL, however considers the scope of NFL-R4 to be too narrow.	Amend Rule NFL-R4 to read: Maintenance repair, replacement or upgrade of buildings and structures (excluding fences), critical infrastructure, existing roads, farm tracks, walking and cycling trails, waterway crossings, or improved pasture within an identified ONF/L Activity status: Permitted Where: 1. The scale of the activity critical infrastructure, road, farm or trail is not increased. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5 resulting from an increase in the scale of the activity. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3. 3. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape.
Reaby Downs Farm Ltd	S18.026	NFL – Natural Features and Landscapes	NFL-R5	Oppose	Supportive of the inclusion of a permitted activity status for fences within the ONL, but questions why only post and wire fences are permitted. Fences are not visually dominant structures and are required for good animal husbandry, health and safety and stock management and are overly restricted within ONLs.	Amend Rule NFL-R5 to read: Fences within an identified ONF/L Activity status: Permitted Where: 1. The fence is required for the exclusion or control of stock or to delineate property boundaries. a post and wire fence; Note: fences are a structure and therefore subject to the river setback rules. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW2.3.
Reaby Downs Farm Ltd	S18.027	NFL – Natural Features and Landscapes	NFL-R6	Oppose	NFL-R6 duplicates ECO-R1(1) and creates confusion as to which standard applies.	Delete Rule NFL-R6 in its entirety.
Reaby Downs Farm Ltd	S18.028	NFL – Natural Features and Landscapes	NFL-Additional provisions sought	Amend	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any new farm track is too restrictive to farming operations.	Add a new rule NFL-R6A: New farm tracks within an identified ONF/L. Activity status: Permitted. Where: 1. Any new farm track is no greater than 7 metres in width. 2. Unretained cut and fill batters shall not: (a) be steeper than 2 horizontal to 1 vertical;

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						(b) be constructed using moisture content susceptible soils; (c) have a bench with a width of more than 1.8m. 3. Excess material from the construction of the farm track is reinstated to match the natural contour of the surrounding land. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on the values as listed within NFL-APP Appendix 5. 2. The necessity of what is proposed and any alternatives. 3. Mitigation measures proposed. 4. The operational or functional need for the activity to be undertaken within an Outstanding Natural Feature or Landscape 5. The benefits of the proposed activity.
Reaby Downs Farm Ltd	S18.029	NFL – Natural Features and Landscapes	NFL-R6	Oppose	Farm tracks are essential to pastoral farming and new tracks are sometimes required to avoid sensitive environments. Requiring consent for any 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
Reaby Downs Farm Ltd	S18.030	NFL – Natural Features and Landscapes	NFL-R7	Oppose	NFL-R7 does not distinguish between extraction of material for use outside of the property from where it was taken and farm quarries as defined in the PGDP.	Amend NFL-R7 as follows: NFL-R7 Mining and Quarrying (excluding farm quarries) within an identified ONF/L Non-Complying

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Reaby Downs Farm Ltd	S18.031	NFL – Natural Features and Landscapes	NFL-Additional provisions sought	Amend	NFL-R7 does not distinguish between extraction of material for use outside of the property from where it was taken and farm quarries as defined in the PGDP.	Insert a new rule NFL-R7A: NFL-R7A Farm quarries that comply with GRUZ-R3. Activity status: Permitted
Reaby Downs Farm Ltd	S18.032	SUB - Subdivision	SUB-R1	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R1.
Reaby Downs Farm Ltd	S18.033	SUB - Subdivision	SUB-R4	Oppose	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R4.
Reaby Downs Farm Ltd	S18.034	SUB - Subdivision	SUB-R11	Oppose	An amendment to exclude activities captured by SUB-R1 and SUB-R4 is sought.	Amend SUB-R11 as follows: Subdivision in any area of an Outstanding Natural Landscape, Outstanding Natural Feature or Significant Natural Area excluding activities captured by SUB-R1 and SUB-R4.
Reaby Downs Farm Ltd	S18.035	SUB - Subdivision	SUB-S1	Oppose	An 8ha minimum lot size does not allow for an efficient use of land and is too small to farm economically but would be a significant loss of productive land if farmers subdivide discrete areas of larger parcels.	Amend SUB-S1 as follows: 1. No lots to be created by subdivision, including balance lots, shall have a net site area less than the minimum specified: ... (h) General Rural - ~~8ha~~ 2 ha.
Reaby Downs Farm Ltd	S18.036	EW - Earthworks	EW - General	Oppose	Stoney Creek supports the recognition of the need for earthworks associated with rural production activities, however considers that the rules contained within the Earthworks Chapter do not reflect the specific constraints and complexities of the Hokonui Hills environment.	Preferred relief: Insert an exemption in the preamble of the chapter for any earthworks and land disturbance activities within the Hokonui Hills Special Precinct. Develop appropriate earthwork provisions for the Hokonui Hills Special Precinct, in consultation with key stakeholders, that reflect the site specific conditions and challenges of this area.
Reaby Downs Farm Ltd	S18.037	EW - Earthworks	EW-O1	Oppose	Minor changes to this Objective are proposed to reflect the purpose of the RMA.	Amend EW-O1 as follows: Earthworks and land disturbance for subdivision, land use and development are facilitated and undertaken in a manner that avoids, remedies or minimises adverse effects on the ~~surrounding~~ environment and protects the natural environment, Ngāi Tahu cultural values, people and property.
Reaby Downs Farm Ltd	S18.038	EW - Earthworks	EW-P1	Support	Supportive of the recognition of the need for earthworks associated with rural production activities.	Retain EW-P1(2) as drafted.
Reaby Downs Farm Ltd	S18.039	EW - Earthworks	EW - General	Oppose	It is unclear how Rules and Standards interact and there is no guidance clarifying the applicability of standards. The activity status should be set by the rule and not the standard, otherwise it is implied activities require consent under both the rule and the standard.	Amend table headings from 'Standards' to 'Standards for Permitted Activities'. Insert a guidance note clarifying whether Standards are applicable to all activities or only those listed within the relevant Rule. Clarify the relationship between rules and standards and whether standards are to be treated as standalone rules.

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Reaby Downs Farm Ltd	S18.040	EW - Earthworks	EW-Exemptions	Amend	Stoney Creek supports the listed exemptions from the Earthworks chapter, but questions the status of a note as opposed to a policy or rule.	Convert the exclusions note to a permitted activity rule in the Earthworks chapter.
Reaby Downs Farm Ltd	S18.041	EW - Earthworks	EW-R1	Oppose	The permitted provisions of EW-R1 are inconsistent and more restrictive than those proposed in the NFL chapter. The width of land disturbance permitted by the rule is not achievable for the installation of fences and is unworkable for a farming operation. General earthworks are permitted up to 1000m3, there is no commentary in the S32 report why fences are further restricted.	Amend Rule EW-R1 to read: Land disturbance for the construction of fences (All zones except ONLs) Activity status: 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.
Reaby Downs Farm Ltd	S18.042	EW - Earthworks	EW-R7	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R7 as follows: General Rural Zone Excluding 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:

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						1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Reaby Downs Farm Ltd	S18.043	EW - Earthworks	EW-R8	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R8 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R8 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility.... ~~9. The matters of discretion of any infringed~~

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						~~Standard(s).~~ 10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Reaby Downs Farm Ltd	S18.044	EW - Earthworks	EW-R9	Oppose	Stoney Creek supports a permitted activity standard for earthworks relating to common farming activities. However, maintenance, repair and upgrade of existing facilities should be excluded from the volume limitations given that these areas are already disturbed. It is not considered necessary to further restrict earthwork activities in the ONL.	Amend Rule EW-R9 as follows: General Rural Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ EW-R9 Activity status: Permitted Where: 1. The total earthworks area for any new dead hole, farm rubbish pit, silage pit or farm track in any 12 month period does not exceed 2,500 m2 per site. 2. The area is progressively stabilised, filled or recontoured. 3. The works are undertaken in accordance with Earthworks Standards EW-S1, EW-S2, EW-S3, EW-S4, EW-S5 and EWS7. No other Earthworks Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The timing and duration of the works. 2. Effects on ground stability. 3. Effects on any adjoining site, including visual effects, dust, noise, vibration or loss of privacy. 4. Visual amenity and landscape effects, and whether there is a functional or operational need for the location of the activity, and the extent to which alternative practicable options have been considered and their feasibility....~~9. The matters of discretion of any infringed~~ ~~Standard(s).~~10. Whether the earthworks are of a type, scale and form that is appropriate for the location and character of the zone.
Reaby Downs Farm Ltd	S18.045	EW - Earthworks	EW-R14	Oppose	Stoney Creek supports a permitted activity standard for earthworks not otherwise provided for. It is considered existing protection of ONLs is achieved through other chapters and further restrictions are unnecessary in the Earthworks chapter.	Amend EW-R14 as follows: Earthworks and land disturbance not otherwise provided for General Rural Zone, Industrial Zone, Airport Zone Excluding Historic Heritage sites, ~~Significant Natural Areas, Outstanding Natural Landscapes or Features.~~ Permitted 1. In any 12 month period, the total volume of earthworks does not exceed 1,000m3 per site. 2. All Earthworks Effects Standards are complied with. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: ...11. Whether there is a functional or operational need for the location of the activity
Reaby Downs Farm Ltd	S18.046	EW - Earthworks	EW-S3	Oppose	Earthworks for fencing activities for stock exclusion should be exempt from these requirements.	Amend EW-S3 as follows: Setbacks from rivers and streams 1. Earthworks (excluding where required for fencing for stock exclusion) shall be set back the minimum distances from the top of the closest bank of a river or stream as follows: (a) 20m for high order rivers or streams (order 5 and above); (b) 10m for middle order rivers or streams (order 3 and (c) 5m for low order rivers or streams (order 1 and 2). Refer to Appendix 3 for river and stream orders

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Reaby Downs Farm Ltd	S18.047	EW - Earthworks	EW-S4	Oppose	It is onerous to consider that any earthworks on land over 15 degrees require a site specific geotechnical assessment, where these could be very minor activities with no adverse effects.	Amend EW-S4 as follows: Instability of Land 1. Earthworks shall not result in any instability of land or structures beyond the boundary of the site where the earthworks occur. ~~be undertaken on land with an existing slope angle exceeding 15 degrees.~~
Reaby Downs Farm Ltd	S18.048	GRUZ - General Rural Zone	GRUZ- Additional provisions sought	Amend	Stoney Creek seeks specific zoning for activities within the Hokonui Hills area to recognise the presence of farming activities and protections for the values of the area with specific objectives policies and rules. Activities within the Hokonui Hills Special Precinct should be exempt from the GRUZ rules.	Insert Hokonui Hills Special Precinct. Develop appropriate provisions for the Hokonui Hills Special Precinct, in consultation with key stakeholders, that reflect the site-specific conditions and challenges of this area.
Reaby Downs Farm Ltd	S18.049	GRUZ - General Rural Zone	GRUZ - General	Oppose	Supportive of objectives, policies and rules specific to rural activities but should not duplicate the more site specific provisions that within the proposed Hokonui Hills Special Precinct.	Insert an exemption in the preamble of the chapter for any activities within the Hokonui Hills Special Precinct.
Reaby Downs Farm Ltd	S18.050	GRUZ - General Rural Zone	GRUZ-O1	Support	Stoney Creek supports the inclusion of an objective recognizing the importance of primary production to the District.	Retain GRUZ-O1 as drafted.
Reaby Downs Farm Ltd	S18.051	GRUZ - General Rural Zone	GRUZ-O2	Amend	Supportive of the description of the character and qualities of the rural zone but consider that a 'very low degree' of built form does not reflect the nature of the zone.	Amend GRUZ-O2 as follows: The character and qualities of the General Rural zone comprise: ... 2. a ~~very~~ low degree of built form, well setback from other properties and roads; and...
Reaby Downs Farm Ltd	S18.052	GRUZ - General Rural Zone	GRUZ-O3	Support	Supportive of recognizing the importance of supporting activities for primary production.	Retain GRUZ-O3 as drafted.
Reaby Downs Farm Ltd	S18.053	GRUZ - General Rural Zone	GRUZ-O4	Support	Supportive of GRUZ-O4.	Retain GRUZ-O4 as drafted.
Reaby Downs Farm Ltd	S18.054	GRUZ - General Rural Zone	GRUZ-O5	Amend	supportive of GRUZ-O5, but considers that it is expanded to cover all rural land and not just highly productive land.	Amend GRUZ-O5 as follows: The value and long-term benefits of using ~~highly productive rural~~ land for primary production is recognised and the availability of highly productive land for primary production for future generations is protected.
Reaby Downs Farm Ltd	S18.055	GRUZ - General Rural Zone	GRUZ-P1	Support	Supportive of GRUZ-P1.	Retain GRUZ-P1 as drafted.
Reaby Downs Farm Ltd	S18.056	GRUZ - General Rural Zone	GRUZ-P2	Support	Supportive of enabling rural industry in the rural zone.	Retain GRUZ-P2 as drafted.
Reaby Downs Farm Ltd	S18.057	GRUZ - General Rural Zone	GRUZ-P3	Support	Supportive of GRUZ-P3.	Retain GRUZ-P3 as drafted.
Reaby Downs Farm Ltd	S18.058	GRUZ - General Rural Zone	GRUZ-P4	Support	Supportive of recognising the benefits of conservation, pest management, riparian planting and fencing in the Rural Environment.	Retain GRUZ-P4 as drafted.
Reaby Downs Farm Ltd	S18.059	GRUZ - General Rural Zone	GRUZ-P5	Support	Supportive of GRUZ-P5.	Retain GRUZ-P5 as drafted.
Reaby Downs Farm Ltd	S18.060	GRUZ - General Rural Zone	GRUZ-P6	Support	Supportive of GRUZ-P6.	Retain GRUZ-P6 as drafted.

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Reaby Downs Farm Ltd	S18.061	GRUZ - General Rural Zone	GRUZ-P7	Amend	Supportive of enabling agriculture aviation activities.	Amend GRUZ-P7 as follows: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities, whilst avoiding, remedying or mitigating any adverse managing the noise effects through controlling the location of airstrips and scale of their use.
Reaby Downs Farm Ltd	S18.062	GRUZ - General Rural Zone	GRUZ-P8	Support	Supportive of recognising that residential activity is required in the rural zone to support primary production.	Retain GRUZ-P8 as drafted.
Reaby Downs Farm Ltd	S18.063	GRUZ - General Rural Zone	GRUZ-P10	Amend	Supportive of the implement the NPSHPL, however GRUZ-P10 as worded is not consistent with the objective and policies of the NPSHPL.	Amend GRUZ-P10 to align with the wording of the NPSHPL.
Reaby Downs Farm Ltd	S18.064	GRUZ - General Rural Zone	GRUZ-P11	Support	Supportive of GRUZ-P11.	Retain GRUZ-P11.
Reaby Downs Farm Ltd	S18.065	GRUZ - General Rural Zone	GRUZ - General	Oppose	It is unclear how Rules and Standards interact and there is no guidance clarifying the applicability of standards. Having an activity status in the standard implies that the standard is a standalone rule. It is also unclear if the standards apply to activities requiring resource consent or only permitted activities.	Amend table headings from “Standards” to “Standards for Permitted Activities”. Insert a guidance note clarifying whether Standards are applicable to all activities or only those listed within the relevant Rule. Clarify the relationship between rules and standards and whether standards are to be treated as standalone rules.
Reaby Downs Farm Ltd	S18.066	GRUZ - General Rural Zone	GRUZ-R1	Amend	Supportive of a permitted activity rule for primary production activities but questions the need to apply the new standards to 'activities' and existing buildings/structures.	Amend GRUZ-R1 as follows: Primary Production (including Intensive Indoor Primary Production) Activity Status: Permitted Where: 1. Any new or extended building, or structure (excluding fences and farm infrastructure) and activity complies with General Rural Zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8. No other GRUZ standards apply. Except that: (a) This rule does not apply to Quarrying and Mining, as those activities are subjects to Rules GRUZ-R2 and GRUZ-R3. (b) This rule does not apply to Plantation Forestry in an ONL, ONF or SNA, which is subject to District Plan rules NFL-R8 and ECO-R1
Reaby Downs Farm Ltd	S18.067	GRUZ - General Rural Zone	GRUZ-R3	Oppose	Farm quarries are considered to be a supporting activity under the NPS HPL and therefore should not be restricted on Highly Productive Land.	Amend GRUZ-R3 as follows: Quarrying Activities Activity status: Permitted All areas excluding ONLs. ...

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						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 Earthworks standards EW-S3, EW-S5 and EW-S7. No other Standards apply. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Location and scale of the activity ... 12. The need for the activity to support primary production.
Reaby Downs Farm Ltd	S18.068	GRUZ - General Rural Zone	GRUZ-R5	Support	Supportive of permitted activity status for the establishment of woodlots.	Retain GRUZ-R5 as drafted.
Reaby Downs Farm Ltd	S18.069	GRUZ - General Rural Zone	GRUZ-R6	Support	Supportive of a permitted activity status for conservation activities.	Retain GRUZ-R6 as drafted.
Reaby Downs Farm Ltd	S18.070	GRUZ - General Rural Zone	GRUZ-R7	Amend	Supportive of permitted status for residential activities with minor amendments.	Amend GRUZ-R7 to read: Residential Activity All areas Activity status: Permitted Where: 1. For new residential units and new minor residential units, standard GRUZ-S1 Density is met; and 2. Any new building, ~~addition~~, or ~~external~~-alteration that increases the number of habitable rooms and activity complies with zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6 and GRUZ-S7; and 3. For minor residential units, the maximum floor area

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						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.
Reaby Downs Farm Ltd	S18.071	GRUZ - General Rural Zone	GRUZ-R9	Support	Supportive of a permitted activity rule for rural commercial activities.	Retain GRUZ-R9 as drafted.
Reaby Downs Farm Ltd	S18.072	GRUZ - General Rural Zone	GRUZ-R11	Support	Supportive of a permitted activity status for homestay activities.	Retain GRUZ-R11 as drafted.
Reaby Downs Farm Ltd	S18.073	GRUZ - General Rural Zone	GRUZ-R13	Support	Supportive of a permitted activity status for rural commercial recreation activities.	Retain GRUZ-R13 as drafted.
Reaby Downs Farm Ltd	S18.074	GRUZ - General Rural Zone	GRUZ-R16	Support	Supportive of a permitted activity status for agricultural aviation activities.	Retain GRUZ-R16 as drafted.
Reaby Downs Farm Ltd	S18.075	GRUZ - General Rural Zone	GRUZ-R17	Amend	The rule table does not provide an activity status for Visitor Accommodation. It appears as though it is incorrectly referenced as GRUZ-R18, which is a discretionary activity.	Provide a correct activity status reference for GRUZ-R17.

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Reaby Downs Farm Ltd	S18.076	GRUZ - General Rural Zone	GRUZ-R20	Oppose	Non-complying status for activities that are not otherwise provided for is extremely stringent.	Amend GRUZ-R20 to read: All other activities Activity Status: ~~Non-complying~~ Permitted 1. Any activities, including associated buildings, not otherwise provided for in the list of rules that comply with all General Rural Zone standards. Activity Status where compliance is not achieved: ~~N/A~~ Discretionary
Reaby Downs Farm Ltd	S18.077	GRUZ - General Rural Zone	GRUZ-S1	Oppose	The standard as worded is unclear as to whether a minor residential unit is allowed in addition to a residential unit.	Amend GRUZ-S1 as follows: Density 1. There shall be no more than one residential unit (not including minor residential units) per 40 hectares; and2. 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
Reaby Downs Farm Ltd	S18.078	GRUZ - General Rural Zone	GRUZ-S3	Oppose	The matters of discretion do not recognise that supporting activities (as defined by the NPSHPL) may need to be located on Highly Productive Land.	Amend GRUZ-S3 to read: ... Restricted Discretionary Matters of discretion: 1. The adverse effects on the rural character. 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and sense of openness. 3. The adverse effects on Ngāi Tahu cultural values including those listed in MW-2.3. 4. Whether the building is located on high class soils and whether it is for a supporting activity. 5. The reason for the additional building size. 6. Noise and odour from housing animals
Reaby Downs Farm Ltd	S18.079	GRUZ - General Rural Zone	GRUZ-S4	Oppose	Reduced setback distances are sought for primary production buildings over 500 m2. The matters of discretion also do not anticipate two or more adjoining sites (legal parcels) that make up a single farm.	Amend GRUZ-S4 as follows: Setback to Side and Rear Boundaries All Areas Any building is setback from any side or rear boundary the minimum distances as follows: 1. Residential buildings are setback 30m; 2. Dairy sheds and buildings that house animals are setback 50m; 3. Buildings greater than 500 square metres are setback ~~200m~~ 50m , except for in the Rural Industry Precinct (PREC13) where the setback is 100m; 4. Buildings less than 10 square metres are setback 2m; and/or 5. All other buildings are setback 15m. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. The adverse effects on rural character 2. The adverse effects on amenity values of adjoining sites, including outlook, privacy, shading, dominance and

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						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.
Reaby Downs Farm Ltd	S18.080	GRUZ - General Rural Zone	GRUZ-S5	Amend	Generally supportive of setbacks to road boundaries, but seeks a reduced setback from Interregional Connector roads.	Amend GRUZ-S5 as follows: Setback to Road Boundaries All Areas Any building or structure is setback from any road boundary the minimum distances as follows: 1. Residential buildings are setback: (a) ~~100m~~ 50m from the boundary of an Interregional Connector road (state highway); (b) 40m from the boundary of a Rural Connector road; ... 5. All other buildings and structures, except fences and farm infrastructure [Refer proposed definition], are setback 15m. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: ... 8. The functional or operational need for the building to be located within the road setback
Reaby Downs Farm Ltd	S18.081	GRUZ - General Rural Zone	GRUZ-S7	Oppose	An exclusion is sought for fences where required to exclude stock from waterbodies or to protect areas of riparian planting.	Amend GRUZ-S7 as follows: Setbacks from stream and river All activities Any building or structure (excluding fences for stock exclusion) is set back from the top of the closest bank of

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						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.
Reaby Downs Farm Ltd	S18.082	GRUZ - General Rural Zone	GRUZ-S9	Oppose	The requirement for helicopter flight paths to be separated horizontally by at least 250m from any noise sensitive activity is 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.~~
Reaby Downs Farm Ltd	S18.083	Interpretation	agricultural aviation activity	Support	Supportive of this definition.	Retain 'agricultural aviation activity' definition as drafted.
Reaby Downs Farm Ltd	S18.084	Interpretation	agricultural, horticultural and pastoral activities	Amend	Farm quarries should be included within the definition of agricultural, horticultural and pastoral activities.	Amend the definition for agricultural, horticultural and pastoral activities to read: Means the use of land and / or buildings which are used for producing livestock, crops and other agricultural produce that is reliant on the soil resource of the land and includes storage of equipment and machinery associated with the activity but excludes any processing, quarrying (except farm quarries) or direct sales.
Reaby Downs Farm Ltd	S18.085	Interpretation	conservation activity	Support	Supportive of this definition.	Retain 'conservation activities' definition as drafted.
Reaby Downs Farm Ltd	S18.086	Interpretation	cultivation	Support	Supports the alignment of definitions with the National Planning Standards.	Retain 'cultivation' definition as drafted.
Reaby Downs Farm Ltd	S18.087	Interpretation	dead holes	Support	Supports this definition.	Retain 'dead holes' definition as drafted.
Reaby Downs Farm Ltd	S18.088	Interpretation	earthworks	Support	Supports this definition.	Retain 'earthworks' definition as drafted.
Reaby Downs Farm Ltd	S18.089	Interpretation	farm quarry	Support	Supportive of this definition.	Retain 'farm quarry' definition as notified.
Reaby Downs Farm Ltd	S18.090	Interpretation	farm track	Amend	Supportive of the definition but wishes to decouple 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.
Reaby Downs Farm Ltd	S18.091	Interpretation	fences	Oppose	It is unclear why post and wire fences have been excluded from this definition as they are specifically referenced within the Rules.	Amend the definition for fences to read: Means any structure, intended to be a permanent division, screen or barrier, but shall not include a ~~post and wire~~

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						~~fence or~~ a temporary fence such as an electric fence or construction hoarding.
Reaby Downs Farm Ltd	S18.092	Interpretation	helicopter Landing Area	Amend	Should be clear that areas used temporarily for helicopter landing areas are also included.	Amend the definition for helicopter landing areas to read: Any area of land, building or structure outside of the Airport Zone intended or designed to be used (including temporarily) , whether wholly or partly, for helicopter movement or servicing, including heliports and helipads
Reaby Downs Farm Ltd	S18.093	Interpretation	highly productive land	Amend	Supportive of the alignment of wording used in higher order documents but the definition references clauses of the NPSHPL that may cause confusion for plan users.	Amend the definition for Highly Productive Land to read: Has the same meaning as the National Policy Statement for Highly Productive Land Means land that has been mapped in accordance with clause 3.4 of the National Policy Statement for Highly Productive Land and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) of the National Policy Statement for Highly Productive Land for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)
Reaby Downs Farm Ltd	S18.094	Interpretation	improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'improved pasture' definition as drafted.
Reaby Downs Farm Ltd	S18.095	Interpretation	indigenous vegetation	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'indigenous vegetation' definition as drafted.
Reaby Downs Farm Ltd	S18.096	Interpretation	indigenous vegetation clearance	Oppose	This definition does not align with the definition for 'vegetation clearance' but should be defined in the same manner regardless of indigenous or exotic species.	Either: Amend the definition for indigenous vegetation clearance as follows: Means the ~~clearing or~~ removal of indigenous vegetation by vegetation clearance ~~any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, overplanting, burning or any other mechanical means as well as mob stocking.~~ Or: Delete the definition of Indigenous Vegetation Clearance entirely
Reaby Downs Farm Ltd	S18.097	Interpretation	land disturbance	Support	Supportive of the definitions with National Planning Standards.	Retain 'land disturbance' definition as drafted.
Reaby Downs Farm Ltd	S18.098	Interpretation	LUC 1, 2 or 3	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'LUC 1, 2 or 3' as drafted.
Reaby Downs Farm Ltd	S18.099	Interpretation	mahinga kai	Amend	Details provided in the definition for Mahinga Kai would be more appropriate in the Mana Whenua chapter.	Amend the definition of mahinga kai to: Means the same as outlined in MW – 2.3.3.3 and is an all-inclusive term that refers to the ability to access resources for harvesting, the site where gathering of these resources occurs, the act of gathering and using the resource, and the good health of the resource. ~~As a result of this practical focus, mahinga kai is considered by Hokonui Rūnanga to be, in today’s language, the principal ‘environmental indicator’ in natural systems. If mahinga kai is not present, or is unsafe to harvest, then that natural system is under stress and requires remedial action. Mahinga kai was and is central to the Ngāi Tahu and Hokonui way of life. The collection and processing of mahinga kai is an important social, cultural, environmental, and~~

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						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.
Reaby Downs Farm Ltd	S18.100	Interpretation	maintenance of improved pasture	Support	Supportive of the alignment of wording used in higher order documents.	Retain 'maintenance of improved pasture' definition as drafted.
Reaby Downs Farm Ltd	S18.101	Interpretation	primary production	Support	Supportive of the alignment with national planning standards.	Retain 'primary production' definition as drafted.
Reaby Downs Farm Ltd	S18.102	Interpretation	rural airstrip	Support	Supportive of this definition.	Retain 'rural airstrip' definition as notified.
Reaby Downs Farm Ltd	S18.103	Interpretation	rural commercial recreation activity	Support	Supportive of this definition.	Retain 'rural commercial recreation activity' definition as drafted.
Reaby Downs Farm Ltd	S18.104	Interpretation	rural environment	Support	Supportive of this definition.	Retain 'rural environment' definition as drafted.
Reaby Downs Farm Ltd	S18.105	Interpretation	rural industry	Support	Supportive of the alignment with national planning standards.	Retain 'rural industry' definition as drafted.
Reaby Downs Farm Ltd	S18.106	Interpretation	rural produce retail activity	Support	Supportive of this definition.	Retain 'rural produce retail activity' as drafted.
Reaby Downs Farm Ltd	S18.107	Interpretation	significant natural area (SNA)	Oppose	This definition does not accurately reflect the definition in the NPSIB and would include areas without following the correct process.	Amend the definition for significant natural area to reflect the NPSIB wording, as follows: Has the same meaning as per the National Policy Statement for Indigenous Biodiversity and means: ~~(a) Areas identified as SNA-1 (Waterfall Range) and SNA-2 Pukerau Red Tussock Reserve) on the planning maps until a suitably qualified ecologist engaged by Gore District Council determines that it is not an SNA~~ ~~(b) any area that is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 4~~ SNA also includes areas meeting the criteria outlined in Appendix 4 including those identified at resource consent stage or as part of a Farm Environment Plan assessment or as part of a Biodiversity Covenant. (a) any area that, after 4 August 2023, is notified or included in a district plan as an SNA following an assessment of the area in accordance with Appendix 1 of the NPSIB; and

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						(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.
Reaby Downs Farm Ltd	S18.108	Interpretation	vegetation clearance	Oppose	Querying why grazing has been so limited in this definition as when managed should not constitute vegetation clearance. This definition is more restrictive than higher documents. Mob-stocking and over planting are technical terms and it is unclear exactly what these refer to as they are not in the PGDP definitions.	Amend the definition of vegetation clearance to read:- (a) the disturbance, damage, destruction, or removal of vegetation by any means (for example, by cutting, crushing, application of chemicals, or burning); and (b) includes activities that result in the disturbance, damage, destruction, or removal of vegetation (for example, ~~over planting~~ , applying the seed of exotic pasture species, ~~mob stocking~~ , or draining away water); but(c) does not include—...v) ~~the grazing of improved pasture within the relevant setback from a natural wetland~~
Reaby Downs Farm Ltd	S18.109	Interpretation	Definitions	Amend	Stoney Creek supports the inclusion of a definition for farm infrastructure to align with the amendments sought to ECO-R1, GRUZ-R1 and GRUZ-S5.	Insert a new definition for farm infrastructure: Means those structures (excluding buildings) reasonably necessary to enable primary production activities relating to irrigation, the provision of stock water, the storage and distribution of animal feed, stock yards and ramps, but excludes fences, farm tracks, feedlots and silage pits.
Reaby Downs Farm Ltd	S18.110	Interpretation	Definitions	Amend	Stoney Creek supports the inclusion of a definition for “supporting activity” as per the NPSHPL, to align with the amendments sought to GRUZ-R3 and GRUZ-S3.	Insert a new definition for supporting activity: Has the same meaning as per the National Policy Statement for Highly Productive Land and means: in relation to highly productive land, those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing).
Reaby Downs Farm Ltd	S18.111	Appendix 5 - NFL-APP - Landscape Values	APP5-NFL-APP	Oppose	Supportive of background information but concerns are raised that the extent, description and attributed values fail to recognise and misrepresent the current land use and values of the area. There is insufficient supporting documentation regarding the extent of the ONL area. Stoney Creek considers that the values listed to be protected are not present over much of the ONL area, which is working farmland and that the ONL area should be reduced. The description does not recognise the character and structures of the station which occupies 42 percent of the area and list qualities of naturalness and wilderness as values to be protected when over 70 percent of the area is a modified pastoral landscape. Pastoral farming can also provide benefits to landscape values through pest and weed management. Croydon Bush Scenic Reserve has distinctively different vegetation form the	Amend Appendix 5 in a way that: ulliAccurately reflects the significant presence of pastoral farming within the ONL;/liliRecognises the benefits provided by pastoral farming in terms of maintaining a sense of openness, landscape legibility and pest control, within the ONL;/liliRecognises 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;/liliCorrects the statement that the ONL is free of structures;/liliRecognises the historical and cultural significance of the area to the rural community; and/liliMake 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./li/ul

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					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.	
Reaby Downs Farm Ltd	S18.112	Natural environmental Values map layers	NFL-MAP-Hokonui Hills	Oppose	The spatial extent of the ONL as notified in the Planning Maps is fundamentally flawed. The mapping appears to be carried over from previous versions of the Plan without review or updates.	Amend the Hokonui Hills ONL boundaries to accurately reflect the area of Outstanding Natural Landscape values. Figure 10 of Appendix B [refer to original submission] provides a suggestion of the extent of the ONL area within Stoney Creek station which can be discussed further with the Council, including incorporating evidence provided by a landscape expert at the hearing stage.
Reaby Downs Farm Ltd	S18.113	Maps	MAP-Additional provisions sought	Amend	Stoney Creek's preferred relief relies upon the establishment of a new precinct to be called the Hokonui Hills Special precinct where rural activities associated with pastoral farming are permitted with appropriate limits 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.
Reaby Downs Farm Ltd	S18.114	GRUZ - General Rural Zone	GRUZ-P9	Support	Stoney Creek supports a policy providing for activities with a genuine link with rural land and primary production.	Retain GRUZ-P9 as drafted.
Reaby Downs Farm Ltd	S18.115	Interpretation	silage pit	Oppose	This definition is broad and could be taken to include areas for the storage of hay or grain within a silo/container, or small scale storage of bagged feed. Alignment with the definition as per the Proposed Southland Land and Water plan is suggested.	Amend the definition of silage pit as follows: ~~Means an area constructed and used for the purpose of fermentation and storage for animal feed.~~ land or structures on which silage (plant material harvested while green for fodder and kept succulent by partial fermentation, but does not include baleage or hay) is stored, processed or directly utilised, excluding the storage of bales of plant material completely encapsulated in plastic.
Reaby Downs Farm Ltd	S18.116	Whole Plan	Whole Plan	Not Stated	Stoney Creek supports the intent of the PGDP to guide sustainable development in the Gore District, managing use and development of natural and physical resources today while protecting the interests and opportunities of future generations to also utilise those resources in a sustainable way. However, considers that the PGDP as drafted has failed to meet this objective. Concerned about lack of consultation and that many of the more problematic provisions have immediate legal effect and therefore must be complied with until a decision is made on the PGDP. This could take years, and has wide reaching implications for the Station in terms of their ability to continue operating.	Withdraw the requested provisions as outlined in the letter to the Chief Executive of Gore District Council dated 7 November 2023
Reaby Downs Farm Ltd	S18.117	NFL – Natural Features and Landscapes	NFL - General	Oppose	The mapped extent of Hokonui Hills ONL extends beyond the area of outstanding natural values and there is no justification provided for the extent. No evidence provided to suggest that the level of protection provided by the Operative Gore District Plan was insufficient.	Modified pastoral landscape should not be mapped as ONL Reduce restrictions relating to the Hokonui Hills ONL overlay

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Reaby Downs Farm Ltd	S18.118	ECO – Ecosystems and Indigenous Biodiversity	ECO - General	Oppose	The provisions were developed in a matter of months after the commencement of the NPSIB which left little space for consultation outside of the formal notification process. A plan change will be necessary to amend rules and map Significant Natural Areas. Blanket protections proposed in the Ecosystems 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
Reaby Downs Farm Ltd	S18.119	Whole Plan	Whole Plan	Oppose	The provisions in general fail to recognise the presence of established farming activities within the district that have low environmental effects yet provide significant social, cultural and economic benefits. Farming in particular is subject to significant increases in the level of restriction when compared with other land uses, and subject to unworkable provisions that have been developed without input from the farming community. These restrictions are particularly restrictive in ONLs and are not practical for farming activities and creates uncertainty and cost to rural landholders that is not proportionate to the potential environmental effects.	Amend as per submission.
Resolution Developments Limited	S17.001	GRUZ - General Rural Zone	GRUZ-S2	Oppose	GRUZS2-2: Definition of rural industry incorporates services such as PGG Wrightson, Farmalnds etc. Analysis provided in attachment shows site coverage for these businesses is much higher than the permitted 5%. The concern is that proposals for these businesses in the Precinct will all trigger the need for Resource Consent requiring neighbor approvals discouraging them from establishing. Intention to establish is indicated by zoning but contradicted by rules- easily corrected. See pg 3 of original submission for Analysis table. The reduction of the coverage from the calculated existing 27% average to 25% strikes a better balance than the currently proposed 5%. It is understood that lower density is desired but 5% results in excessive land area to obtain necessary building sizes. The geotechnical constraints of the site will naturally limit the density of the area as a whole and this increase in coverage should be considered in this light.	Wording changed to: The maximum building coverage shall not exceed 5 percent per site where the building is used for a rural industry activity on sites greater than 7,000m². Where sites are equal to or less than 7,000m², building coverage shall not exceed 25 percent of the site.

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Resolution Developments Limited	S17.002	GRUZ - General Rural Zone	GRUZ-S4	Oppose	GRUZ-S4-3: Rural Businesses require buildings greater than 500m ² at an average of 1517m ² , bringing the 100m setback rule into play in all but one instance in attached Figure 1. If the site development is proposed all at once 20.55 Ha or 16% of the area becomes subject to the discretion of the neighbouring landowners and occupants. Neighbouring parties often become strategic or disruptive when given the opportunity under the guise of ‘Reserve Sensitivity and Amenity values’. At Saleyard Road nearby a 5m green buffer area has been proposed between the Industrial and Rural Lifestyle Zones. It makes sense that Reserve Sensitivity and Amenity Values are addressed by Plan Notification using same along the western boundary of Section 7E Edendale Settlement (depicted in figure 3, pg 6). If the 100m setback were to remain it is likely to be avoided creating a ‘waste land’ strip of land avoided by development. This would be a lost opportunity for the District with land set aside for economic development by the plan remaining undeveloped or productive. It follows that adverse amenity effects are probable if the strip of land is not managed with the likely establishment of weeds and such. The 100m setback seems to apply internally to the zone which is concerning for staged site development by unrelated parties. Internally the coal extraction activities and non-structural reinstatement of the ground post, serve to constrain development density. It seems unreasonable to apply the setback internally beyond the typical yard and daylight restrictions. These businesses will likely share clientele being sympathetic to each other as opposed to adverse, significantly reducing potential for occurrence of reverse sensitivity.	GRUZ-S4-3. – Buildings greater than 500 square metres are setback 200m, except for in the Rural Industry Precinct (PREC13) where the setback is ~~100m~~ 10m . Also request that a 10m wide green buffer strip is added to the plan similar to that shown adjacent to Saleyard Road. This will address setback issues externally and internally for staged development
Resolution Developments Limited	S17.003	GRUZ - General Rural Zone	GRUZ-PREC13-O1	Support in part	The applicant requests to retain the Precinct zoning over their property with some minor modifications of to the identified standards.	Generally supportive of the proposed Precinct zoning over their land parcel subject to the matters raised under GRUZ-S2 & S4.
Resolution Developments Limited	S17.004	GRUZ - General Rural Zone	GRUZ - General	Support	Support in part the proposal to create Rural Industry Precinct 13 adjacent to the west of Pioneer Highway. The Submitter supports the proposed Objectives, Policies, Spatial Mapping Location of the Precinct and all relevant Rules/Standards with exception of the following submission points	Support in part the proposal to create Rural Industry Precinct 13
Richard Agnew	S56.001	GDC – Gore District Council	GDC-10	Oppose	Lack of consultation with effected residentsbr /Council has plenty of land around water treatment plant, buffer of 50m not necessary. It reaches 340m from the East Gore Water Tank.br /Reduced flexibility for landowners on	Remove Buffer Zone around East Gore Water Treatment Plant

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					their property Buffer Zone exists in key growth area- Residential A and in future will not be able to subdivide and will have negative financial outcomes Rate payers since 1980 /br /	
Richard Agnew	S56.002	Zone map layers	Water Supply Treatment Facility Buffer Area	Oppose	Lack of consultation with effected residents Council has plenty of land around water treatment plant, buffer of 50m not necessary. It reaches 340m from the East Gore Water Tank. Reduced flexibility for landowners on their property Buffer Zone exists in key growth area- Residential A and in future will not be able to subdivide and will have negative financial outcomes Rate payers since 1980	Remove Buffer Zone around East Gore Water Treatment Plant
Robina Johnston	S140.001	UFD – Urban form and development	UFD-General	Not Stated	See submission	Considers managed retreat is needed for the Gore community, that growth needs to be projected for 30 years and the west of Gore is most appropriate for growth. See submission
Robina Johnston	S140.002	NFL – Natural Features and Landscapes	NFL - General	Not Stated	Considers that the Hokonui Hills is not the only outstanding landscape significant to the urban centre of Gore and that the slopes on the eastern side of Mataura River that are equally dominant and have incredible character, cultural value, and are highly visibly and should also equally classed. Marauwai is blessed to be a basin surrounded by slopes that add beautification. Gore Council need to protect these ranges as they also have the strike ridges of the southern syncline fault-line making quarrying accessible. br /	protect the slopes on the eastern side of Mataura River, and the ranges around the Marauwai basin
Robina Johnston	S140.004	RLZ – Rural Lifestyle Zone	RLZ - General	Not Stated	The Hokonui Hills area has historically been used for its many resources and settlements by Māori and Pakeha. The Reserve is a pathway for recreation users. Visual effects of existing development has been mitigated by low reflectivity material and landscaping of the road boundary. Screening is not regulated and indigenous species are favoured, but indigenous species are not as fast growing as exotics and native birds enjoy the exotics. Considers the entire Hokonui Lifestyle Zone need to be visually mitigated. The area is high in amenity values and will grow west.	The entire Hokonui Lifestyle Zoned area from the road would have to be mitigated to avoid public view. The transformation of road buffering the Reaby Road would need vegetation or bunds to hide public view. Reverse sensitivity should be a consideration for Hokonui Lifestyle zone and vegetation buffers are needed. Raises concerns about adequate fencing for stock and that this should be netting.
Robina Johnston	S140.005	NFL – Natural Features and Landscapes	NFL - General	Not Stated	Observing infrastructure on whenua for telecommunications, wifi, wind and solar the lack of policy to make these structures blend into the natural world. Commercial developments needs a higher degree of mitigation than domestic with vegetation in the landscape. Consideration needed for colour and effect of lights on the landscape. Uses Kaiwera wind farm as an example.	Policy consideration of visual effects on landscape values from infrastructure and commercial developments

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Robina Johnston	S140.006	ECO – Ecosystems and Indigenous Biodiversity	ECO - General	Not Stated	Southern Rata is a prolific species with a remarkable flowering mast and there is a vast amount along the Haumuri Reserve . Corridors for our native species can be assisted by growth. Education and advocacy are not the most effective techniques. Successful models need to be farmer led with goals and visions.br /br /A lot of the Hokonui zone is weed and pest especially on the southern faces.br /br /	Consider Southern Rata and Haumuri Reserve and native species corridors.Allow for eartworks for stock access via culvert crossings and conseted wetland
Robina Johnston	S140.007	NOISE – Noise	NOISE - General	Not Stated	Variance needs to be allowed for terrain elevation and reflecting noise. The Hokonui's & Kaiwera ranges needs consideration as activity can cause stress due to reflection of noise and levels of noise amplifying. Considers noise from existing industrial and commercial activities is a problem and can have stress and health effects.	Consider the effects of terrain reflecting and amplifying noise.
Robina Johnston	S140.008	LIGHT – Light	LIGHT - General	Not Stated	the red beacon lights for flying could they not be adjusted their rotation in an br /upwards directed to avoid visual light pollution that is constant from the turbines or the number reduced from 50% of the structures to 10 25%.	seeks reduction in light emission
Robina Johnston	S140.009	TRANS – Transport	TRANS - General	Not Stated	Commercial operators move to rural zone their activity then means that Council br /contactors increase road sweeping in rural roads that adjoin gravel. Increased activity then causes damage to third party vehicles or recreational users. Sharing of costs needs to investigated as the increased of activity or type of vehicles or number of vehicles has an impact of third parties. Individuals often don't understand what these impacts are and sign authority to approve activity if it involves consent or not. It seems there is no rule to prevent damage and nuisance to parties.	Consideration of effects on third parties of increased commercial activities in rural areas and sharing of costs.
Robina Johnston	S140.010	HAZS – Hazardous Substances	HAZS - General	Not Stated	Nothing is mentioned above hazardous products being stored in safe, maintained and earthquake strengthened buildings. Resource consent applications should include information of regular activity of more than 10 individuals and buildings with capacity of more than 10. Storage of the dross in mill the local town hall was Mataura's haven in an emergency adding risk to multiple parties. But recreational activity in buildings used for yoga, bible studies etc. should be aware of risks if near a hazardous product to air, waterways, property etc. Also that the building needs to be manned by a minimum of hours and logged and reported to Council every three months. br /The landlord at mill might as well be a absentee owner, employees weren't visible and Mataura township dealt with the short fall with volunteers such as the fire brigade and Council resources.br /	Consideration of the safe storage of hazardous products, reporting, the risk to people and the community, and emergency services.

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Robina Johnston	S140.011	INFR – Infrastruct ure	INFR - General	Not Stated	infrastructure is important but beautification and screening off structures to br /camouflage and blend into a more natural environment is need especially with the acceleration of sustainable energy.	Considerations of the visual effects on the natural environment from infrastructure
Robina Johnston	S140.012	EW - Earthworks	EW - General	Not Stated		Considers that land with more than 60% over 10 degrees should provide swales and a vegetation to mitigate the runoff from the new dwelling and buildings to stabilize slopes and beautification.
Robina Johnston	S140.013	SUB - Subdivisio n	SUB - General	Not Stated		Considers that location, design and construction of infrastructure for subdivision should be in collaboration with all parties concerned when applying for consent to achieve suitable results.
Robina Johnston	S140.014	Whole Plan	Whole Plan	Not Stated		Financial contributions should offset future costs in the specific location of the activity, further work needed on what is appropriate and consideration should be given of commercial vs non commercial activities. Payment should be in part at key steps.
Robina Johnston	S140.015	How the Plan works	General approach	Not Stated	Good communication is key to cross boundary issues, expresses concern about disconnection between wards and communities.	not stated
Ronald Ashby	S107.001	LIZ – Light Industrial Zone	LIZ-O4	Not Stated	Clarification as to the intent of this objective, void on draft plan.	Void from the plan
Ronald Ashby	S107.002	NOISE – Noise	NOISE-S1	Oppose	Proposed noise increase in the range of 20% is substantial and will apply across various zones of township. Unlike perimeter area being rezoned industrial into Mixed use this area is characterised as framed by recreation / parkland & centre of town with established dwellings. Plan supports new retail but rejects established element.	Reduced maximum noise level
Ronald Ashby	S107.003	Zone map layers	LIZ-MAP	Oppose	Unlike the perimeter area being re zoned Industrial in to Mixed Use this current area is characterised as framed by recreation/ parkland and centre of town with established dwellings. Plan supports new retail however rejects established element.	Retain mixed-use zoning.
Ronald Ashby	S107.004	Zone map layers	MUZ-MAP	Oppose	Unlike the perimeter area being re zoned Industrial in to Mixed Use this current area is characterised as framed by recreation/ parkland and centre of town with established dwellings. Plan supports new retail however rejects established element.	Retain Mixed Use zoning
Ronald Crispin	S60.001	SUB - Subdivisio n	SUB - General	Oppose	Wish for farmers to retain rights to subdivide a small portion of their land to retire on. A small lot is a better option that having a larger economic property split into larger parcels of uneconomic blocks, creating Hobby farms which don't contribute to the GDP.	Minimum lot size to be decreased for rural properties.
Ronald Crispin	S60.002	ECO – Ecosystem s and Indigenous Biodiversit y	ECO - General	Oppose	Does not agree with the inclusion of SNAs as this will cause more division.	SNAs should not be included in the plan.

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
Ronald Crispin	S60.003	SASM - Sites and Areas of Significance to Māori	SASM - General	Oppose	Does not agree with inclusion of Areas of Significance to Māori in the plans. Concerned that it will cause more division.	Sites and Areas of Significance to Māori should not be included in the plan.
Ronald Crispin	S60.004	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.
Ronald Crispin	S60.005	Interpretation	abrasive blasting	Support	Adopts the National Planning Standard definition	Retain as notified
Ronald Crispin	S60.006	Interpretation	access strip	Support	Adopts the Resource Management Act 1991 definition.	Retain as notified
Ronald Crispin	S60.007	Interpretation	additions	Support	This definition relates specifically to historic heritage therefore provides clarity for the reader.	Retain as notified
Ronald Crispin	S60.008	Interpretation	agricultural aviation activity	Oppose	SFF support the inclusion of a definition, however greater clarity and detail is required.	~~means the use of aircrafts or helicopters used ancillary and in association with primary production.~~ Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed wing aeroplanes, helicopters, and unmanned aerial vehicles
Ronald Crispin	S60.009	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
Ronald Crispin	S60.010	Interpretation	ancillary activity	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.011	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.~~
Ronald Crispin	S60.012	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)~~

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Ronald Crispin	S60.013	Interpretation	bore	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.014	Interpretation	building	Support	The notified definition follows the National Planning Standards	Retain as notified
Ronald Crispin	S60.015	Interpretation	Definitions	Support	SFF recommends the Council include a definition for collector road.	Include new definition (Collector Road) and make any necessary consequential amendments.
Ronald Crispin	S60.016	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.
Ronald Crispin	S60.017	Interpretation	cultivation	Support	The notified definition follows the National Planning Standards	Retain as notified
Ronald Crispin	S60.018	Interpretation	dead holes	Support	SFF supports the inclusion of this definition.	Retain as notified
Ronald Crispin	S60.019	Interpretation	earthworks	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.020	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
Ronald Crispin	S60.021	Interpretation	farm track	Support	This definition captures the normal use of a farm track.	Retain as notified
Ronald Crispin	S60.022	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.~~
Ronald Crispin	S60.023	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.
Ronald Crispin	S60.024	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.

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Ronald Crispin	S60.025	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
Ronald Crispin	S60.026	Interpretation	functional need	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.027	Interpretation	highly productive land	Support	The notified definition follows the National Policy Statement for Highly Productive Land.	Retain as notified
Ronald Crispin	S60.028	Interpretation	indigenous vegetation	Support	The notified definition follows the National Policy Statement for Indigenous Biodiversity.	Retain as notified
Ronald Crispin	S60.029	Interpretation	indigenous vegetation clearance	Oppose in part	As drafted, the definition does not provide for excluding grazing as it states ‘clearing or removal of indigenous vegetation by any means’. Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being ‘cleared’ pursuant to the current proposed definition. Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assisting with regeneration. It is not clear what is meant by ‘overplanting’. Where the vegetation is within areas of improved pasture, especially on hill country, overplanting (e.g. by helicopter) followed by grazing to trample in the seed is common practice and allows for pasture renewal. It is crucial that this be removed from the definition.	Amend definition and make any necessary consequential amendments: Means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, , burning or any other mechanical means. ~~as well as mob stocking.~~ It does not include grazing of pasture or improved pasture species in that area of indigenous vegetation.
Ronald Crispin	S60.030	Interpretation	intensive indoor primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.031	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.
Ronald Crispin	S60.032	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.
Ronald Crispin	S60.033	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
Ronald Crispin	S60.034	Interpretation	minor residential unit	Support	The notified definition follows the National Planning Standards	Retain as notified
Ronald Crispin	S60.035	Interpretation	modify	Support	The notified definition makes clear that ‘modify’ is in relation to an archaeological site	Retain as notified

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Ronald Crispin	S60.036	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
Ronald Crispin	S60.037	Interpretation	noise	Support	Support as definition has the same meaning as section 2 of the RMA.	Retain as notified
Ronald Crispin	S60.038	Interpretation	noise sensitive activity	Support	SFF supports the activities listed as noise sensitive.	Retain as notified
Ronald Crispin	S60.039	Interpretation	notional boundary	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.040	Interpretation	plantation forestry	Support	The notified definition follows the National Environmental Standards for Plantation Forestry	Retain as notified
Ronald Crispin	S60.041	Interpretation	primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified
Ronald Crispin	S60.042	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'.
Ronald Crispin	S60.043	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.
Ronald Crispin	S60.044	Interpretation	river	Support	Support as has the same meaning as the RMA.	Retain as notified
Ronald Crispin	S60.045	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
Ronald Crispin	S60.046	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	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.

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					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.	
Ronald Crispin	S60.047	Interpretation	rural industry	Support	Support as has the same meaning as the National Planning Standards.	Retain as notified
Ronald Crispin	S60.048	Interpretation	sensitive activity	Support	SFF agrees with the list of sensitive activities.	Retain as notified
Ronald Crispin	S60.049	Interpretation	sign	Support	Support the definition of ‘sign’ which has the same meaning as per the National Planning Standards.	Retain as notified
Ronald Crispin	S60.050	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.
Ronald Crispin	S60.051	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 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	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.~~
Ronald Crispin	S60.052	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,	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

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					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.	
Ronald Crispin	S60.053	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.
Ronald Crispin	S60.054	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.
Ronald Crispin	S60.055	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
Ronald Crispin	S60.056	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.
Ronald Crispin	S60.057	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.~~
Ronald Crispin	S60.058	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.
Ronald Crispin	S60.059	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	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.

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					recognise the contribution of an activity does not provide the activity with protection.	
Ronald Crispin	S60.060	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.
Ronald Crispin	S60.061	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.
Ronald Crispin	S60.062	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.
Ronald Crispin	S60.063	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.
Ronald Crispin	S60.064	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 regional plans and therefore the duplication contained in the PDP must be removed.	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).
Ronald Crispin	S60.065	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	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.

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					minimal if the movements are related to primary production in a rural setting.	
Ronald Crispin	S60.066	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.
Ronald Crispin	S60.067	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.
Ronald Crispin	S60.068	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.
Ronald Crispin	S60.069	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.
Ronald Crispin	S60.070	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'
Ronald Crispin	S60.071	NH – Natural Hazards	NH-P7	Support	Support is given as this policy provides a nonregulatory approach.	Retain NH-P7 as drafted.
Ronald Crispin	S60.072	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
Ronald Crispin	S60.073	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;
Ronald Crispin	S60.074	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	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...

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					‘significant risk’ to safety could be problematic and subjective.	
Ronald Crispin	S60.075	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...
Ronald Crispin	S60.076	HH – Historical Heritage	HH-P14	Support	It is important to encourage non-regulatory methods for heritage conservation.	Retain HH-P14 as drafted.
Ronald Crispin	S60.077	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.
Ronald Crispin	S60.078	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.
Ronald Crispin	S60.079	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.
Ronald Crispin	S60.080	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.
Ronald Crispin	S60.081	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.

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Ronald Crispin	S60.082	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).
Ronald Crispin	S60.083	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.
Ronald Crispin	S60.084	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 .
Ronald Crispin	S60.085	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 ’
Ronald Crispin	S60.086	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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Ronald Crispin	S60.087	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;
Ronald Crispin	S60.088	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.
Ronald Crispin	S60.089	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.
Ronald Crispin	S60.090	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.
Ronald Crispin	S60.091	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: (...)
Ronald Crispin	S60.092	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	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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					existing pastoral farms in this policy. A nuanced approach that considers mitigation, design, and adaptive management can lead to better outcomes in terms of sustainable development, environmental stewardship, and social well-being. We believe that a more balanced and pragmatic approach is necessary to address the complexities of environmental and social challenges effectively. It is also recommended that this policy provide for lawfully established activities.	
Ronald Crispin	S60.093	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.
Ronald Crispin	S60.094	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: (...)
Ronald Crispin	S60.095	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.
Ronald Crispin	S60.096	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.
Ronald Crispin	S60.097	ECO – Ecosystems and Indigenous	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	Include a definition for ‘lawfully established’ (if that is the intention) or remove italics. Amend ECO-R1: Where: 1. It is necessary for the following purposes: (a) The maintenance, repair or replacement or upgrade of existing lawfully established: (i) fences and farm fences (ii) vehicle and farm tracks; (...) (ix) network utilities and ~~the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i) and~~

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		Biodiversity			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, 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	~~(vi)~~ —(...) (e) Maintenance of improved pasture where: (i) the improved pasture has not become a mapped SNA, and (...) emNOTE - 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./em
Ronald Crispin	S60.098	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.
Ronald Crispin	S60.099	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.
Ronald Crispin	S60.100	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.
Ronald Crispin	S60.101	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	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.

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					outstanding, rather than preventing or limiting any subdivision, use or development.	
Ronald Crispin	S60.102	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.
Ronald Crispin	S60.103	NFL – Natural Features and Landscapes	NFL-P2	Support in part	The purpose of NFL-P2 is supported however we have some concerns with the interpretation of angling fisheries species. It is requested that this be updated to refer to native fish species.	Amend NFL-P2: Provide for and encourage the restoration and/or enhancement of the natural character of the Te Au Nui Pihapiha Kanakana Mataura Falls where: 1. Restoration and/or enhancement will achieve long-term improvement in natural character, landscape and associated Ngāi Tahu cultural values; and/or 2. It will assist in the restoration of indigenous biodiversity or ecosystems and angling and native fisheries species;
Ronald Crispin	S60.104	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
Ronald Crispin	S60.105	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.
Ronald Crispin	S60.106	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)
Ronald Crispin	S60.107	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-	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.

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					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.	
Ronald Crispin	S60.108	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 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. SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for	Amend NFL-R3: Land disturbance and Earthworks within an identified ONF/L (excluding for the laying of stockwater, drainage or other utility pipes, or stock exclusion) Activity status: Permitted Where: 1. The depth of the earthworks shall not exceed 12m below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed 13m above the original surface of the ground; and 3. the area of the earthworks shall not exceed 100m2 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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					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.	
Ronald Crispin	S60.109	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.
Ronald Crispin	S60.110	NFL – Natural Features and Landscapes	NFL-R5	Support in part	Fencing is important for keeping out stock or pests from native bush and waterways, therefore provides a positive effect. SFF is unsure why the Council would limit the fencing type to only post and wire as permitted. Other types of fencing, such as post and rail or waratah fencing, require a resource consent as currently drafted. It is our view that farmers should not have to apply for a resource consent where fencing is for the purposes of keeping out stock or pests. Such a requirement will impact on farmers’ ability to carry out day-to-to farming operations. We have made earlier comments on the definition of fencing, to ensure that all types of fences are included We have proposed a new definition for ‘farm fences’ and it is crucial this is adopted to ensure NFL-R5 achieves the intended purpose.	Amend NFL-R5: Activity status: Permitted Where: 1. The fence is a farm fence ~~Note: fences are a structure and therefore subject to the river setback rules.~~ Activity Status where compliance is not achieved: ~~Restricted discretionary~~ Matters of discretion: 1. Effects on the values listed within NFL APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW 2.3.
Ronald Crispin	S60.111	NFL – Natural Features and Landscapes	NFL-R6	Oppose	SFF request this rule is deleted as it duplicates ECO-R1.	Delete NFL-R6
Ronald Crispin	S60.112	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	Amend NFL-R6: ~~7: New Roads, farm fences, farm tracks, walking and cycling tracks within an identified ONF/L~~ Activity status: ~~Restricted Discretionary~~ Permitted ~~Matters of discretion:~~ 1. Effects on the values as listed within NFL APP Appendix 5. 2. Impacts on Ngāi Tahu cultural values, including those listed in MW 2.3. 3. The necessity of what is proposed and any alternatives. 4. Mitigation measures proposed.

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					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.	
Ronald Crispin	S60.113	NFL – Natural Features and Landscape s	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
Ronald Crispin	S60.114	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.
Ronald Crispin	S60.115	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.
Ronald Crispin	S60.116	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.
Ronald Crispin	S60.117	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	Include new policy

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					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	
Ronald Crispin	S60.118	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.
Ronald Crispin	S60.119	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~~
Ronald Crispin	S60.120	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.
Ronald Crispin	S60.121	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.
Ronald Crispin	S60.122	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.
Ronald Crispin	S60.123	SUB - Subdivision	SUB-S1	Support in part	SFF supports increasing the minimum lot size in the rural zone to 8ha. In the interests of protecting highly productive land and ensuring that the district maintains suitably sized working farms, 8ha is a reasonable minimum lot size for the rural zone. We agree with the s 32 report which states that the current 2ha minimum lot size could result in 'the loss of highly productive land and farmland available for primary production'.	Retain SUB-S1 as drafted.
Ronald Crispin	S60.124	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.
Ronald Crispin	S60.125	EW - Earthworks	EW-R1	Oppose	SFF finds this rule unnecessarily restrictive and is unsure why the Council is taking this	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~~

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					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.	~~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.~~
Ronald Crispin	S60.126	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.
Ronald Crispin	S60.127	EW - Earthworks	EW-R8	Support	Support is given for earthworks for silage pits being a permitted activity.	Retain EW-R8 as notified.
Ronald Crispin	S60.128	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
Ronald Crispin	S60.129	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.
Ronald Crispin	S60.131	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.
Ronald Crispin	S60.132	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.
Ronald Crispin	S60.133	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.
Ronald Crispin	S60.134	NOISE – Noise	NOISE-O1	Support	This objective identifies that within different zones, different levels of noise will be appropriate.	Retain NOISE-O1 as notified.
Ronald Crispin	S60.135	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.
Ronald Crispin	S60.136	NOISE – Noise	NOISE-P2	Support in part	The RMA states a duty to avoid, remedy or mitigate adverse effects on the environment	Amend NOISE-P2: Ensure the health and wellbeing of people and the community is not adversely affected ~~-protected~~ by (...)

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					from activities. As such, the wording in NOISE-P2 should be updated to reflect this	
Ronald Crispin	S60.137	NOISE – Noise	NOISE - General	Support	NCFF supports Note 2: #9 which provides for an exemption for agriculture, horticulture and pastoral farming activities. However, it is suggested that audible bird scaring device’ is included here, and a corresponding definition included.	Amend NOISE-Note 2 #9: 9. Noise from vehicles, machinery or equipment undertaking agricultural, horticultural and pastoral activities including noise from stock, other outdoor animals and working dogs, and audible bird scaring devices but excluding noise from stationary processing activities.
Ronald Crispin	S60.138	Interpretation	Definitions	Support	With regards to Noise- Note 2; NCFF supports ‘audible bird scaring device’ being defined	Include a definition for ‘audible bird scaring device’ as: ‘Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds’
Ronald Crispin	S60.139	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 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.~~
Ronald Crispin	S60.140	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.
Ronald Crispin	S60.141	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;—(...)~~
Ronald Crispin	S60.142	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.
Ronald Crispin	S60.143	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Support in part	In the Gore District, there are farmers whose families have been farming the land for many generations. They value their land and have developed an intergenerational culture which must be preserved alongside other cultural and historical aspects identified in the District Plan as of importance. SFF believes that heritage resources help to teach us about the past and the cultures of those who came before us, but we note that this seldomly appropriately reflects rural or pastoral heritage and culture as ‘valued’. There is an opportunity as part of this	Amend Overview and Purpose: The purpose of the General Rural Zone is to provide for and protect rural production activities and other activities that rely on the rural resource. The General Rural Zone is the largest zone in the District and this land resource underpins the economic, ~~and social~~ and cultural well-being of the District.

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					process to celebrate the district’s rural heritage and the history of our early pioneering farmers.	
Ronald Crispin	S60.144	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.
Ronald Crispin	S60.145	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 .
Ronald Crispin	S60.146	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.
Ronald Crispin	S60.147	GRUZ - General Rural Zone	GRUZ-O4	Support	SFF supports the preservation of the purpose and character of the GRUZ.	Retain GRUZ-O4 as notified.
Ronald Crispin	S60.148	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.
Ronald Crispin	S60.149	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.
Ronald Crispin	S60.150	GRUZ - General Rural Zone	GRUZ-P2	Support	It is appropriate to include a separate policy enabling rural industry activities.	Retain GRUZ-P2 as notified.
Ronald Crispin	S60.151	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.
Ronald Crispin	S60.152	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.
Ronald Crispin	S60.153	GRUZ - General Rural Zone	GRUZ-P6	Support	SFF supports this policy.	Retain GRUZ-P6 as notified.
Ronald Crispin	S60.154	GRUZ - General Rural Zone	GRUZ-P7	Support in part	SFF support the enablement of agricultural aviation activities and acknowledge the potential reverse sensitivity effects. However, as stated in comments on the NOISE chapter, SFF do not support limitations on agricultural aviation activities.	Amend GRUZ-P7: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities., ~~whilst managing the noise effects through controlling the location of airstrips and scale of their use.~~

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Ronald Crispin	S60.155	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.
Ronald Crispin	S60.156	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.
Ronald Crispin	S60.157	GRUZ - General Rural Zone	GRUZ-P10	Support	Protection of highly productive land is supported.	Retain GRUZ-P10 as notified.
Ronald Crispin	S60.158	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.
Ronald Crispin	S60.159	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 (...)
Ronald Crispin	S60.160	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.
Ronald Crispin	S60.161	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;~~
Ronald Crispin	S60.162	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;~~
Ronald Crispin	S60.163	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	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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					and Employment laws, we think this rule is unnecessary. A home business may operate at any hour of the day, as is the nature of online businesses with international networks/customers. Furthermore, it is unnecessary to limit the time in which vehicles may be loaded or unloaded for a home businesses in a rural environment where disturbance is unlikely. This rule is over regulatory.	
Ronald Crispin	S60.164	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.~~
Ronald Crispin	S60.165	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.
Ronald Crispin	S60.166	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) ~~40~~ 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 (...)
Ronald Crispin	S60.167	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:
Ronald Crispin	S60.168	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.
Ronald Crispin	S60.169	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	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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					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.	
Ronald Crispin	S60.170	RLZ – Rural Lifestyle Zone	RLZ-O2	Support in part	We suggest this objective is reworded as the intention is not clear.	Reword RLZ-O2.
Ronald Crispin	S60.171	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.~~
Ronald Crispin	S60.172	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.
Ronald Crispin	S60.173	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.
Ronald Crispin	S60.174	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
Ronald Crispin	S60.175	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.
Ronald Crispin	S60.176	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

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Ronald Crispin	S60.177	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.
Ronald Crispin	S60.178	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a 'site.' The s 32 report refers to a trigger approach, with resource consent applications acting as 'triggers' for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan's approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as 'high risk' and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the council's intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Ronald Crispin	S60.179	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 this. There 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.
Ronald Crispin	S60.180	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

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Ronald Crispin	S60.181	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
Ronald Crispin	S60.182	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of ‘growth pays for growth’ is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be ‘best practice’ to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Ronald Crispin	S60.183	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both ‘existing use rights’ and ‘lawfully established’ to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Ronald Crispin	S60.184	Whole Plan	Whole Plan	Amend	Throughout the Plan, ‘well-being’ is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as ‘well-being’. The Plan should align with the legislation.	Change wellbeing to well-being
Ronald Crispin	S60.185	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’.
Ronald Crispin	S60.186	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.
Ronald Crispin	S60.187	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 8 persons.

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Roy Agnew	S62.001	Zone map layers	Water Supply Treatment Facility Buffer Area	Oppose	The buffer zones used around the Gore & Mataura Water supply aren't required and intrude onto private properties. Where buffer zones cross onto private property it will prevent subdivision of land reducing the flexibility of what a landowner is able to do, however, they are still required to pay full residential rates. The submitter was informed that the buffer zone was to act as a mechanism to inform potential buyers of a nearby water plant. Which seems excessive as a note in the property file of nearby properties would meet this requirement. The buffer zone begins at the Council land boundary and not from a building wall boundary. At its furthest point from the east Gore water tank, the buffer zone reaches 340m. br /The buffer zone will create significant financial implications on existing landowners, e.g. devaluation which in turn creates mental health issues as owners are worried about not being able to sell properties. Financial compensation is likely to be sought through the courts if the zoning proceeds. br /There has been a lack of consultation with neighbouring properties.	Remove the buffer zones around the water supply plants in Gore and Mataura.
Royal Forest and Bird Society of NZ Inc	S110.001	Interpretation	Definitions	Amend	No reasons given	Add: Ecological District: A particular geographical region that has a characteristic landscape and range of biological communities.
Royal Forest and Bird Society of NZ Inc	S110.002	Interpretation	Definitions	Amend	No reasons given	Add: Ecosystem Services: The benefits obtained from ecosystems such as: (a) supporting services, (e.g., nutrient cycling, soil formation, habitat creation); and (b) provisioning services, (e.g., food, freshwater, wood, fibre, fuel); and (c) regulating services, (e.g., water purification, climate regulation, flood regulation, disease regulation); and (d) cultural services, (e.g., aesthetic, spiritual, educational, recreational)
Royal Forest and Bird Society of NZ Inc	S110.003	Interpretation	Definitions	Amend	No reasons given	Add: Ecological Corridor: a functional zone of passage between several natural zones for a group of species dependent on a single environment. This corridor therefore connects different populations and favours the spread and migration of species, as well as the re-colonisation of environments that have been disturbed. Also sometimes called a wildlife corridor, habitat corridor, or green corridor.
Royal Forest and Bird Society of NZ Inc	S110.004	Interpretation	green infrastructure	Amend	At the moment green infrastructure is defined in the definitions, but not blue. The National Planning Framework includes examples of local urban design initiatives such as nature-based solutions (such as urban forestry and vertical greening) and blue and green infrastructure (such as water sensitive urban design)	Add blue infrastructure to definitions (change the current green infrastructure to blue and green infrastructure and add definition)
Royal Forest and Bird Society of NZ Inc	S110.005	Interpretation	Definitions	Amend	No reasons given	Add: Grey Infrastructure: Human-engineered traditional approaches to water management such as pipes and hard surfaces.
Royal Forest and Bird Society of NZ Inc	S110.006	Interpretation	Definitions	Amend	No reasons given	Add: Nature Based Solutions: Solutions that are inspired and supported by nature, and provide environmental, social and economic benefits and help build resilience. Examples include: restoration or constructing wetlands, forest restoration, riparian planting, allowing rivers to reclaim parts of their natural flood plains in strategic places, rain gardens, green roofs and so on.

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Royal Forest and Bird Society of NZ Inc	S110.007	Interpretation	plantation forestry	Amend	Has the same meaning as per the National Environmental Standards for Commercial Forestry.	Change: ~~Plantation Forestry~~ Commercial Forestry
Royal Forest and Bird Society of NZ Inc	S110.008	ENRG – Energy	ENRG-Overview	Amend	The environmental effects of lignite extraction need to be highlighted, as these can be devastating, especially to water bodies.	Amend to: The Gore District has the potential to provide for large scale energy production utilising wind. The district also contains substantial lignite reserves. However, the adverse environmental effects arising from its extraction , production and use, particularly its contribution to climate change, rules out the development of lignite under current technology.
Royal Forest and Bird Society of NZ Inc	S110.009	ENRG – Energy	ENRG-Overview	Amend	While Forest & Bird supports the increased use and development of renewable energy types, there is a need for the energy development to be appropriately located taking account of biodiversity, environmental, landscape and social factors. The potential effects on natural landscape, amenity, biodiversity and ecosystems need to be considered. Renewable electricity generation facilities placed in the wrong area/s can have a devastating effect to the environment and indigenous biodiversity. Due to this, their potential locations are often constrained.	The location of renewable electricity generation facilities is often driven by their functional need and operational need to access renewable energy resources. With wind for example, suitable sites are located on exposed ridge lines where there is a constant wind. This limits the geographic areas where renewable electricity generation activities can occur. Logistical or technical practicalities, and the need to integrate with existing supporting infrastructure, may also place constraints on the location of these activities, as does potential effects on natural landscape, amenity, biodiversity and ecosystems.
Royal Forest and Bird Society of NZ Inc	S110.010	ENRG – Energy	ENRG-O1	Amend	As in the purpose of the RMA - to promote sustainable management, so resources aren't just managed, they're managed sustainably.	Amend to: The significant local, regional and national benefits derived from the use and development of renewable energy resources are recognised and provided for and the transitional need for non-renewable energy is appropriately and sustainably managed.
Royal Forest and Bird Society of NZ Inc	S110.011	ENRG – Energy	ENRG-P1	Amend	Renewable energy has less emissions than fossil fuels, therefore recognising this as a benefit, and its reduced contribution to climate change, should be highlighted.	Add: 6. reducing emissions and contribution to climate change
Royal Forest and Bird Society of NZ Inc	S110.012	ENRG – Energy	ENRG-P11	Amend	Large scale renewable energy activities and the location of structures and the infrastructure supporting them, can potentially cause devastating effects to indigenous biodiversity through loss of habitat, vegetation clearance, bird/bat strike (with turbines and power cables) and so on. Therefore, in order to ensure sustainable development, adverse effects on indigenous biodiversity and ecosystems must be considered when locating large scale renewable energy.	Add: 10. adverse effects on indigenous biodiversity and the eco-systems that support them
Royal Forest and Bird Society of NZ Inc	S110.013	ENRG – Energy	ENRG-R1	Amend	There is no requirement in the plan to avoid SNAs. The addition of this rule would ensure that SNAs are protected.	Amend: 2. No structure or building is located in an Outstanding Natural Feature or Landscape, and/or a Significant Natural Area ; and
Royal Forest and Bird Society of NZ Inc	S110.014	ENRG – Energy	ENRG-S1	Amend	An ecological assessment must be undertaken to identify any SNA that may exist on the site. There is no requirement in the plan to avoid SNAs. The addition of this rule would ensure that SNAs are protected.	Add: 5. a comprehensive ecological assessment must be completed by a suitably qualified person. 6. No structure is to be located in a Significant Natural Area
Royal Forest and Bird Society of NZ Inc	S110.015	INFR – Infrastructure	INFR-Overview	Amend	There is no reference to Nature Based Solutions in the plan as notified. Including this information as part of the overview (and in the definitions as suggested) encourages developers to look to these options as a first, before grey infrastructure. These options can provide significant benefit to the district in	Add: The use of sustainable infrastructure, such as Nature Based Solutions and blue green infrastructure means infrastructure is often able to perform more effectively and efficiently than traditional grey infrastructure solutions. Nature Based Solutions provide opportunities to improve degraded natural environments, improve local amenity and enhance long-term environmental resilience. These options can also be used to purify water, as well as minimise floods and erosion, reduce the urban heat island effect, deliver enhanced air quality and enhance people's mental and physical wellbeing. The overall cost of sustainable infrastructure can also be a fraction of grey infrastructure solutions, due to lower ongoing

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					amenity, environment/natural values, hazard control, water quality and so on.	maintenance costs. These approaches help us to minimise the impacts of climate change by improving our resilience and allowing infrastructure to adapt to change
Royal Forest and Bird Society of NZ Inc	S110.016	INFR – Infrastructure	INFR-O4	Amend	There is no reference to Nature Based Solutions in the plan as notified. Including this objective ties-in to the suggested addition in the overview, and encourages developers to look to these options as a first, before grey infrastructure. These options can provide significant benefit to the district in amenity, environment/natural values, hazard control, water quality and so on.	Add: INFR-O4 Low-emission and climate-resilient urban environments are encouraged by considering blue and green infrastructure options and nature based solutions as first options before grey engineering.
Royal Forest and Bird Society of NZ Inc	S110.017	INFR – Infrastructure	INFR-P4	Amend	There is no reference to Nature Based Solutions in the plan as notified. Including this policy ties-in to the suggested INFR-O4 addition, and encourages developers to look to these options as a first, before grey infrastructure. These options can provide significant benefit to the district in amenity, environment/natural values, hazard control, water quality and so on.	Change: Encourage blue and green infrastructure, nature based solutions and renewable energy generation.
Royal Forest and Bird Society of NZ Inc	S110.018	INFR – Infrastructure	INFR-P7	Amend	The inclusion of indigenous biodiversity is reference to NPSIB 1.7(a) – maintaining indigenous biodiversity, and at least no overall reduction.	Manage the development of infrastructure, so that adverse effects on adjoining activities, sites, indigenous biodiversity , ecosystem health, and Ngāi Tahu cultural values are avoided, remedied or mitigated.
Royal Forest and Bird Society of NZ Inc	S110.019	INFR – Infrastructure	INFR-Additional provisions sought	Amend	There is no requirement in the plan to avoid SNAs. The addition of this rule would ensure that SNAs are protected so they can continue to perform their function.	Add: INFR-S10 - Minimum Setbacks from Significant Natural Areas All zones 1. Any infrastructure building or structure must be set back 10 metres from the closest boundary of any identified Significant Natural Area. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Whether there is a functional need for the building or structure to be located in the Significant Natural Area, and the extent to which alternative practicable options have been considered and their feasibility. 2. The effects on the indigenous biodiversity, habitats and eco-system within the Significant Natural Area. 3. Impacts on Ngāi Tahu cultural values, including those listed in MW.2.3. 4. Landscape effects 5. Social effects
Royal Forest and Bird Society of NZ Inc	S110.020	TRANS – Transport	TRANS-P12	Amend	The replacement of the current wording in this policy incorporates Part 2 of the RMA, and requires adverse effects to be managed. Should seek to minimize carbon emissions (in construction and ongoing use).	Change: Managing the adverse effects from the use, design and location of the transport network and land transport infrastructure on the natural environment by ensuring appropriate stormwater treatment and management, and ~~limiting the presence and~~ avoiding, remedying, or mitigating effects on outstanding natural features and landscapes, ecosystems and indigenous biodiversity unless there are no practical alternatives.
Royal Forest and Bird Society of NZ Inc	S110.021	TRANS – Transport	TRANS-Additional provisions sought	Amend	Climate change is not really mentioned in the policies, except for TRANS-P6 encouraging alternative modes of transport. The efficient planning, construction and use of the transport network should be also addressed as this can greatly reduce carbon emissions.	Add: TRANS-P14 Seek to minimise carbon emissions in planning, construction, maintenance and ongoing use of the transportation network.
Royal Forest and Bird Society of NZ Inc	S110.022	HAZS – Hazardous Substances	HAZS-O1	Amend	The effects should not have to be significant to justify a change in location, design or operation. Any effect should be minimised, regardless of whether the environment is sensitive or not, to ‘no more than minor’.	Change: Locate, design and operate significant hazardous facilities to prevent ~~significant~~ adverse effects on the health of people, the ~~values of sensitive~~ environments and the underlying relationship Ngāi Tahu hold with the natural environment.
Royal Forest and Bird Society of NZ Inc	S110.023	HAZS – Hazardous Substances	HAZS-P1	Amend	The sensitive environments definition does not include water bodies. It is important that this is included in the policy, as significant hazardous facilities have the potential to cause severe impacts to water quality and aquatic environments.	Amend: Manage adverse effects from new significant hazardous facilities located in the General Industrial Zone and Rural Industry Precinct by: ... 1. locating significant hazardous facilities outside of, and setback from, water bodies , sensitive environments and avoiding adverse effects on Ngāi Tahu cultural values;

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Royal Forest and Bird Society of NZ Inc	S110.024	HAZS – Hazardous Substances	HAZS-P2	Amend	The sensitive environments definition does not include water bodies. It is important that this is included in the policy, as significant hazardous facilities have the potential to cause severe impacts to water quality and aquatic environments.	Amend: Avoid adverse effects from new significant hazardous facilities by: ... 2. locating significant hazardous facilities outside of, and setback from, water bodies and sensitive environments and
Royal Forest and Bird Society of NZ Inc	S110.025	NH – Natural Hazards	NH-P7	Amend	If the definition of Nature Based Solutions is included as suggested, this can include natural features, buffers, riparian plantings and more.	Change: Encourage the use, maintenance and enhancement of ~~natural features and buffers such as riparian planting~~ Nature Based Solutions to manage the risks of natural hazards on people, property, and the environment.
Royal Forest and Bird Society of NZ Inc	S110.026	ECO – Ecosystems and Indigenous Biodiversity	ECO-Overview	Amend	This has been written before the release of the NPSIB, and needs to be updated.	Change: based on changes to national and regional policy direction, there is a gap in current identified SNAs that ~~will~~ needs to be addressed following the release of the National Policy Statement on Indigenous Biodiversity.
Royal Forest and Bird Society of NZ Inc	S110.027	ECO – Ecosystems and Indigenous Biodiversity	ECO-Overview	Amend	This has been written before the release of the NPSIB, and needs to be updated.	A 10-year implementation timeframe for the NPSIB ~~is anticipated~~ has been given , which includes the development of a regional biodiversity strategy, an integrated approach across administrative boundaries, the need to work in partnership with tangata whenua and landowners, and notes that support will be provided from the regional council for mapping which must be completed by August 2028.
Royal Forest and Bird Society of NZ Inc	S110.028	ECO – Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Amend	Increasing positive knowledge and education about SNAs and ecosystem services will inform the community of the numerous benefits of protecting and enhancing these areas, and may make the identification process easier.	Add: ECO-05 Utilise the identification and restoration of Significant Natural Areas to enhance ecosystem services, community knowledge and education.
Royal Forest and Bird Society of NZ Inc	S110.029	ECO – Ecosystems and Indigenous Biodiversity	ECO-P2	Amend	In order for adverse effects to be avoided as much as possible and for SNAs to be protected, those proposing activities within these areas should have to demonstrate that there is nowhere else on their property where this activity can take place practicably (as well as having to demonstrate the need for it).	Amend: Allow activities within Significant Natural Areas that may impact indigenous biodiversity values where ... 3. The activity has a functional need to be located in the area and there are no practicable alternative locations; or
Royal Forest and Bird Society of NZ Inc	S110.030	ECO – Ecosystems and Indigenous Biodiversity	ECO-P5	Amend	This has been written before the amendment of the NESPF (now NESCF), and needs to be updated. Wilding seedling spread is a constant challenge with commercial forestry, and this must be addressed, especially if within an SNA.	Change: ~~Plantation Commercial~~ Forest activities in any existing ~~plantation-commercial~~ forest within a SNA must be managed in a manner that: 1. Maintains indigenous biodiversity in the SNA as far as practicable while providing for ~~plantation commercial~~ forest activities to continue, and 2. Maintains the long-term populations of any Threatened or At Risk (declining) species present in the area; and 3. Does not produce any wilding seedlings or ongoing control must be implemented within a 10km distance of the planting.
Royal Forest and Bird Society of NZ Inc	S110.031	ECO – Ecosystems and Indigenous Biodiversity	ECO-P6	Amend	It seems entirely logical to begin with/prioritize council owned and/or managed land, such as parks and reserves, to promote the restoration of indigenous biodiversity.	Add: 7. Land owned and/or managed by Council.
Royal Forest and Bird Society of NZ Inc	S110.032	ECO – Ecosystems and Indigenous Biodiversity	ECO-P10	Amend	The effects should not have to be significant to justify a review of effects. Any effect should be managed to ‘no more than minor’ to fulfil the RMA purpose of sustainable management. The NPSIB Policy 15 does not require only viable populations of highly mobile fauna to be maintained, but all highly mobile fauna. ‘Policy 15: Areas outside SNAs that support specified	Change: Maintain indigenous biodiversity across the district by: 1. Managing any ~~significant~~ adverse effects of new subdivision, use or development by applying the effects management hierarchy; 2. Managing the adverse effects of new subdivision, use or development on highly mobile fauna areas in order to maintain ~~viable~~ populations of specified highly mobile fauna across their natural range.

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					highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.'	
Royal Forest and Bird Society of NZ Inc	S110.033	ECO – Ecosystems and Indigenous Biodiversity	ECO-P12	Amend	The community's interpretation of what is a pest or not can change person to person. It is important that it is specified that these are the pests in the Regional Pest Management Plan.	Change: Avoid the planting of exotic weed species and the intentional release or farming of animal pests identified in the Regional Pest Management Plan within SNA's.
Royal Forest and Bird Society of NZ Inc	S110.034	ECO – Ecosystems and Indigenous Biodiversity	ECO-Additional provisions sought	Amend	Grazing of an SNA could have a devastating effect to the area, especially if it contains species which are palatable to livestock. There is also potential of ground pugging/vegetation destruction from trampling, nutrient enrichment, loss of habitat/nesting sites and so on. However, there could be cases where livestock grazing is beneficial in controlling exotic weed spread, but the applicant would need to prove this in order to be able to graze these areas.	Add: ECO-R4 Livestock grazing within a Significant Natural Area Activity status: Restricted Discretionary Matters of discretion:1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 3. The quantity and quality of indigenous vegetation impacted and the reasons for the activity. 4. The activity has a functional need to be located in the area. 5. An ongoing grazing plan to ensure the stock type, stock numbers and duration of grazing is combatable with the biodiversity values present. 6. the matters outlined in ECO-P2, ECO-P6, ECO-P7, ECO-P10, ECO-P11 and ECO-P12.
Royal Forest and Bird Society of NZ Inc	S110.035	NFL – Natural Features and Landscapes	NFL-Overview	Amend	The current explanation of Gores landscape is that it is all farmland and contains no natural value. This is not true, and there are in fact pockets of highly valuable indigenous biodiversity which used to occupy the whole district, and could naturally extend its range if given the opportunity. It is important that this is recognised. The Southland Syncline parallel ridges are also a special feature of the district which has been omitted from this list.	Change: The Landscape of the Gore District can largely be characterised as pastoral and arable farmland along with pockets of tussock grasslands, native forest, shrubland, scrubland, grassland and wetlands. There are with two-three prominent natural landscapes / features: the Hokonui Hills, ~~and the~~ Te Au Nui Pihapiha Kanakana Mataura Falls and the Southland Syncline parallel ridges.
Royal Forest and Bird Society of NZ Inc	S110.036	NFL – Natural Features and Landscapes	NFL-P1	Amend	As in the renewable energy section, the location of large-scale developments of this nature have the potential to cause adverse effects on natural landscapes/features, as well as to biodiversity and ecosystems.	Change: 4. Avoiding activities that are incompatible with the identified values, including plantation forestry, renewable energy and mineral extraction,
Royal Forest and Bird Society of NZ Inc	S110.037	NFL – Natural Features and Landscapes	NFL-P2	Amend	The restoration or enhancement of angling fisheries species could adversely impact indigenous fish by increasing predation by exotic species.	Change: 2. It will assist in the restoration of indigenous biodiversity or ecosystems ~~and angling fisheries species;~~ and/or
Royal Forest and Bird Society of NZ Inc	S110.038	SUB - Subdivision	SUB-O5	Amend	The addition of ecological connections adds in the important aspect of keeping areas connected to allow native fauna to be able to expand their range, or to easily get from one area of their range to another. NPS-IB 1.7(v) requires connectivity between, and buffering around, ecosystems used or occupied by indigenous biodiversity	Add: Esplanade reserves and esplanade strips are created through subdivision to contribute to the protection of ecological values and cultural values, provide natural hazard mitigation, create ecological connections and provide for public access to and along rivers.
Royal Forest and Bird Society of NZ Inc	S110.039	SUB - Subdivision	SUB-P18	Amend	There is no definition or explanation of what test landscapes, vegetation or indigenous biodiversity will need to go through to deem if	Add/change: Protect and enhance landscapes, vegetation, ecological connections and indigenous biodiversity ~~that are of a sufficient value that they should be retained.~~

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					they hold ‘sufficient value’ is. This means that it is ambiguous and up to the discretion/opinion of the person applying for and/or the person processing the resource consent. It is of Forest & Birds opinion that all indigenous biodiversity is of sufficient value, and should be enhanced and protected. The addition of ecological connections adds in the important aspect of keeping areas connected to allow native fauna to be able to expand their range, or to easily get from one area of their range to another. NPS-IB 1.7(v) requires connectivity between, and buffering around, ecosystems used or occupied by indigenous biodiversity.	
Royal Forest and Bird Society of NZ Inc	S110.040	SUB - Subdivision	SUB-R5	Amend	Allows ecology and/or indigenous biodiversity to be taken into account as a matter of br /discretion when new development is occurring to ensure development (especially greenfield) does not adversely impact on ecology and/or indigenous biodiversity. This is in alignment with NPS-IB 1.7.	Add: 15. Effect on ecological values or indigenous biodiversity
Royal Forest and Bird Society of NZ Inc	S110.041	ASW – Activities on the Surface of Water	ASW-O1	Amend	There are no objectives in this section ensuring that ecosystems, habitats and biodiversity is not harmed due to the effects of surface water activities and structures, and this should be added	Add: 4. Do not adversely affect aquatic and riparian ecosystems, wildlife habitats and indigenous biodiversity.
Royal Forest and Bird Society of NZ Inc	S110.042	EW - Earthworks	EW-P5	Amend	Policy EW-P5 (2) requires that natural character of rivers and their margins are preserved and water quality, stream health, the intrinsic values of ecosystems are maintained/enhanced, but there is no mention of terrestrial ecosystems/biodiversity. It is also important that, given the significant effects that earthworks can have on nesting species (particularly birds) that these effects are taken into account, especially for large scale earthworks.	Add: 7. Indigenous biodiversity and ecological connections are maintained or enhanced, including consideration given to nesting/roosting times of rare or threatened indigenous species or taonga species.
Royal Forest and Bird Society of NZ Inc	S110.043	EW - Earthworks	EW-R10	Amend	With the permitted volume being 2,500m2, volumes above this have the potential to cause significant effects to both indigenous biodiversity and ecological connections. This should be a matter of discretion when assessing earthworks consents of this scale/volume, regardless of the reason for the earthworks.	Add: Matters of discretion 11. Effects on indigenous biodiversity and ecological connections.
Royal Forest and Bird Society of NZ Inc	S110.044	EW - Earthworks	EW-R11	Amend	With the permitted volume being 2,500m2, volumes above this have the potential to cause significant effects to both indigenous biodiversity and ecological connections. This should be a matter of discretion when assessing earthworks consents of this scale/volume, regardless of the reason for the earthworks.	Add: Matters of discretion 11. Effects on indigenous biodiversity and ecological connections.
Royal Forest and Bird Society of NZ Inc	S110.045	EW - Earthworks	EW-R13	Amend	Areas such as those prone to Natural Hazards (Flooding) have the potential to contain high ecological/biodiverse values due to it proximity	Add: Matters of discretion 6. Effects on indigenous biodiversity and ecological connections.

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					to a water body and (usually) undeveloped nature. Allowing earthworks in these areas without regard to ecology/biodiversity could result in significant effects to both indigenous biodiversity and ecological connections. This should be a matter of discretion when assessing earthworks consents in these areas	
Royal Forest and Bird Society of NZ Inc	S110.046	EW - Earthworks	EW-R14	Amend	With the permitted volume being 250m3/1000m3 (depending on zone) in a 12-month period, volumes above this have the potential to cause significant effects to both indigenous biodiversity and ecological connections. This should be a matter of discretion when assessing earthworks consents of this scale/volume.	Add: Matters of discretion 11. Effects on indigenous biodiversity and ecological connections
Royal Forest and Bird Society of NZ Inc	S110.047	GRUZ - General Rural Zone	GRUZ-O2	Amend	The majority of Significant Natural Areas are found on rurally zoned land; therefore, it is important that ecology/biodiversity are recognised as character/qualities of the zone. This also links in to GRUZ-P4	Add: 5. Potential for Significant Natural Areas, and pockets of high ecological/indigenous biodiversity value.
Royal Forest and Bird Society of NZ Inc	S110.048	GRUZ - General Rural Zone	GRUZ-P4	Amend	It is important to protect what remains, as well as the potential for an increase/enhancement. It is also important to specify that this is indigenous biodiversity and not exotic biodiversity.	Change: Recognise the benefits of conservation, pest management, ~~increasing~~ protection and enhancement of indigenous biodiversity, riparian planting, and fencing erosion prone areas.
Royal Forest and Bird Society of NZ Inc	S110.049	GRUZ - General Rural Zone	GRUZ- Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the General Rural Zone. NOTE: Compliance with GRUZ-S10 would also need to be added into GRUZ-R1 (1), GRUZ-R2 (5), GRUZ-R3 (5), GRUZ-R4 (1) & (9), GRUZ-R7 (2) & (6), GRUZ-R8 (7), GRUZ-R9 (4), GRUZ-R10 (4), GRUZ-R13 (3) and GRUZ-R14 (3).	Add: GRUZ-S10 - Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 3. The activity has a functional need to be located in the area.
Royal Forest and Bird Society of NZ Inc	S110.050	RLZ – Rural Lifestyle Zone	RLZ-P5	Amend	It is important that setbacks apply to no only waterways, but to SNAs which may occur in the zone to ensure their ecological and biodiversity values are protected from inappropriate activities and development	Add: 4. appropriate setbacks to waterways and Significant Natural Areas to maintain and enhance amenity values, ecological values, Ngāi Tahu cultural values, and natural character.
Royal Forest and Bird Society of NZ Inc	S110.051	RLZ – Rural Lifestyle Zone	RLZ-Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the Rural Lifestyle Zone. NOTE: Compliance with RLZ-S12 would also need to be added into RLZ-R2 (3) & (6), RLZ-R4 (4), RLZ-R5 (1), RLZ-R8 (1) and RLZ-R9 (3).	Add: RLZ-S13- Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 3. The activity has a functional need to be located in the area.
Royal Forest and Bird Society of NZ Inc	S110.052	LIZ – Light Industrial Zone	LIZ-P3	Amend	There is the potential that light industrial activities could cause effects on indigenous biodiversity and/or ecological corridors depending on its location (for example light spill impact on wildlife), therefore this point should	Add: Matters of discretion 3. Cause adverse effects on indigenous biodiversity or ecological corridors.

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					be added to 'Avoid activities that may'. This also links back to LIZ-O5.	
Royal Forest and Bird Society of NZ Inc	S110.053	LIZ – Light Industrial Zone	LIZ-R10	Amend	This rule flows on from the above policy addition, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors.	Add: 7. The extent and scale of adverse effects on indigenous biodiversity or ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.054	LIZ – Light Industrial Zone	LIZ-R11	Amend	This rule flows on from the above policy addition, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors.	Add: 5. The extent and scale of adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.055	LIZ – Light Industrial Zone	LIZ-R12	Amend	This rule flows on from the above policy addition, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors.	Add: 5. The extent and scale of adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.056	LIZ – Light Industrial Zone	LIZ-R13	Amend	This rule flows on from the above policy addition, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors.	Add: 5. The extent and scale of adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.057	LIZ – Light Industrial Zone	LIZ-R14	Amend	This rule flows on from the above policy addition, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors.	Add: 5. The extent and scale of adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.058	LIZ – Light Industrial Zone	LIZ-Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the Light Industrial Zone.	Add: LIZ-S11- Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 3. The activity has a functional need to be located in the area.
Royal Forest and Bird Society of NZ Inc	S110.059	GIZ – General Industrial Zone	GIZ-P4	Amend	There is the potential that industrial activities could cause effects on indigenous biodiversity and/or ecological corridors depending on its location, therefore this point should be added to 'Avoid activities that may'. This also links back to GIZ-O4	Add: Matters of discretion 3. Cause adverse effects on indigenous biodiversity or ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.060	GIZ – General Industrial Zone	GIZ-R1	Amend	This rule flows on from the above policy addition and GIZ-O4, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors	Add: 3. There is no more than minor adverse effects on indigenous biodiversity or ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.061	GIZ – General Industrial Zone	GIZ-R2	Amend	This rule flows on from the above policy addition and GIZ-O4, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors	Add: 3. There is no more than minor adverse effects on indigenous biodiversity or ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.062	GIZ – General Industrial Zone	GIZ-R3	Amend	This rule flows on from the above policy addition and GIZ-O4, and would ensure that any new industrial activity does not adversely affect	Add: 3. There is no more than minor adverse effects on indigenous biodiversity or ecological corridors.

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					indigenous biodiversity and/or ecological corridors	
Royal Forest and Bird Society of NZ Inc	S110.063	GIZ – General Industrial Zone	GIZ-R4	Amend	This rule flows on from the above policy addition and GIZ-O4, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors	Add: 3. There is no more than minor adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.064	GIZ – General Industrial Zone	GIZ-R5	Amend	This rule flows on from the above policy addition and GIZ-O4, and would ensure that any new industrial activity does not adversely affect indigenous biodiversity and/or ecological corridors	Add: 3. There is no more than minor adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.065	GIZ – General Industrial Zone	GIZ-Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the Industrial Zone.	Add: GIZ-S11 - Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 3. The activity has a functional need to be located in the area.
Royal Forest and Bird Society of NZ Inc	S110.066	NOSZ – Natural Open Space Zone	NOSZ-P2	Amend	There is the potential that establishment of a building and/or structure could cause the disturbance or clearance of indigenous vegetation. This policy would ensure it remains intact.	Add: 7. Ensuring indigenous vegetation is not disturbed or cleared.
Royal Forest and Bird Society of NZ Inc	S110.067	NOSZ – Natural Open Space Zone	NOSZ-R5	Amend	Allowing a permitted rule for agricultural, horticultural and pastoral activities in this zone without any provisions could cause biodiversity loss. It is important that if these activities are going to be established in this zone, that they ensure there is no adverse effect on biodiversity/ecology.	Add: 1. The activity should not cause an adverse effect on indigenous biodiversity or ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.068	NOSZ – Natural Open Space Zone	NOSZ-R11	Amend	Allowing building activity to occur in this zone has the potential cause adverse effects in indigenous biodiversity and/or ecological corridors. Providing the potential of this affect as a matter of discretion means it can be considered in the granting of a restricted discretionary consent	Add:Matters of discretion. 10. Any adverse effects on indigenous biodiversity or ecological corridors
Royal Forest and Bird Society of NZ Inc	S110.069	NOSZ – Natural Open Space Zone	NOSZ-R12	Amend	Allowing the building of an Education Facility in this zone has the potential cause br /adverse effects in indigenous biodiversity and/or ecological corridors. Providing the potential of this affect as a matter of discretion means it can be considered in the granting of a restricted discretionary consent.br /	Add: Matters of discretion. 11. Any adverse effects on indigenous biodiversity or ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.070	NOSZ – Natural Open Space Zone	NOSZ-Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the Natural Open Space Zone. NOTE: Compliance with NOSZ-S6 would also need to be added into NOSZ-R11(2) and NOSZ-R12(2).	Add: NOSZ-S6 - Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 3. The activity has a functional need to be located in the area.

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Royal Forest and Bird Society of NZ Inc	S110.071	SARZ – Sports and Active Recreation Zone	SARZ-O2	Amend	There is an opportunity in this zone, especially as it includes parks, to protect and enhance environmental values. This could be through native plantings, small rock gardens for lizards, daylighting stormwater drains to create small streams and so on	Add: 5. Environmental , cultural and historic value
Royal Forest and Bird Society of NZ Inc	S110.072	SARZ – Sports and Active Recreation Zone	SARZ-P2	Amend	While sport and recreation are important to community wellbeing, so is the health of the environment which fosters people’s connection with nature. Ensuring adverse effects are minimised on the environment as part of these activities ensures people are able to engage in sport and recreation, whilst also getting the benefits of natural environmental values. There has been a history of Mountain bikes within Croydon Bush Scenic Reserve, some without approval, and others that exceeded the agreed standards. Mountain bike tracks result in vegetation loss, habitat fragmentation, and weed/exotic plant invasion/spread.	Add: 3. Minimise adverse effects on the environmental , character and amenity values of the surrounding area.
Royal Forest and Bird Society of NZ Inc	S110.073	SARZ – Sports and Active Recreation Zone	SARZ-P6	Amend	As above, we agree that sport and recreation is important to community wellbeing, it should not be at the sacrifice of the environment. Requiring adverse effects to be avoided both at the site and adjoining, means that indigenous biodiversity has the freedom to move within their natural range. This is in alignment with the purpose of the RMA.	Add: (c) indigenous biodiversity or ecological corridors of the open space area the activity is proposing to locate in, and adjoining sites.
Royal Forest and Bird Society of NZ Inc	S110.074	SARZ – Sports and Active Recreation Zone	SARZ-R1	Amend	As explained in the commentary for SARZ-P2, some recreational activities, such as mountain biking, can cause the above effects. It is important that any new activities are assessed the ensure that these effects are not caused, and if they are, then a restricted discretionary status is required and the effects can be appropriately avoided, remedied and/or mitigated.	Add: 3. The activity does not result in any vegetation loss, habitat fragmentation, and weed/exotic plant invasion/spread. Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 4. The effects on indigenous biodiversity, habitat connection/fragmentation and weed/exotic plant invasion/spread.
Royal Forest and Bird Society of NZ Inc	S110.075	SARZ – Sports and Active Recreation Zone	SARZ-R2	Amend	As explained in the commentary for SARZ-P2, some recreational activities, such as mountain biking, can cause the above effects. It is important that any new activities are assessed the ensure that these effects are not caused, and if they are, then a restricted discretionary status is required and the effects can be appropriately avoided, remedied and/or mitigated.	Add: 3. The activity does not result in any vegetation loss, habitat fragmentation, and weed/exotic plant invasion/spread. Activity status where compliance is not achieved: Restricted DiscretionaryMatters of discretion: 4. The effects on indigenous biodiversity, habitat connection/fragmentation and weed/exotic plant invasion/spread.
Royal Forest and Bird Society of NZ Inc	S110.076	SARZ – Sports and Active Recreation Zone	SARZ-R3	Amend	As explained in the commentary for SARZ-P2, some recreational activities, such as mountain biking, can cause the above effects. It is important that any new activities are assessed the ensure that these effects are not caused, and if they are, then a restricted discretionary status is required and the effects can be	Add: 3. The activity does not result in any vegetation loss, habitat fragmentation, and weed/exotic plant invasion/spread. Activity status where compliance is not achieved: Restricted DiscretionaryMatters of discretion: 4. The effects on indigenous biodiversity, habitat connection/fragmentation and weed/exotic plant invasion/spread.

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					appropriately avoided, remedied and/or mitigated	
Royal Forest and Bird Society of NZ Inc	S110.077	SARZ – Sports and Active Recreation Zone	SARZ-R4	Amend	As explained in the commentary for SARZ-P2, some recreational activities, such as mountain biking, can cause the above effects. It is important that any new activities are assessed the ensure that these effects are not caused, and if they are, then a restricted discretionary status is required and the effects can be appropriately avoided, remedied and/or mitigated	Add: 3. The activity does not result in any vegetation loss, habitat fragmentation, and weed/exotic plant invasion/spread. Activity status where compliance is not achieved: Restricted DiscretionaryMatters of discretion: 4. The effects on indigenous biodiversity, habitat connection/fragmentation and weed/exotic plant invasion/spread.
Royal Forest and Bird Society of NZ Inc	S110.078	SARZ – Sports and Active Recreation Zone	SARZ-Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the Sports and Active Recreation Zone.	Add: SARZ-S8 - Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated.4. The activity has a functional need to be located in the area.
Royal Forest and Bird Society of NZ Inc	S110.079	AIRPZ – Airport Zone	AIRPZ-O2	Amend	Any expansion or new activity at the airport could result in adverse environmental affects, these need to be managed as per the RMA.	Add: The effects arising from new or expanded activities within the Airport Zone are managed to minimise adverse effects on the amenity of adjacent land, the environment and the underlying Ngāi Tahu relationships with the natural environment.
Royal Forest and Bird Society of NZ Inc	S110.080	AIRPZ – Airport Zone	AIRPZ-P3	Amend	It is not just river and stream values that need protected. Changing this to environmental values would include water bodies, but will also include indigenous biodiversity, ecosystems etc.	Change: 5. protects ~~river and stream~~ environmental values from inappropriate development.
Royal Forest and Bird Society of NZ Inc	S110.081	AIRPZ – Airport Zone	AIRPZ- Additional provisions sought	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. The addition of this standard would ensure that buildings/structures are not established within an SNA in the Airport Zone.	Add: AIRPZ-S5 - Setbacks from a Significant Natural Area (all activities) Permitted activity 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: 1. Effects on Significant Natural Area values and indigenous biodiversity values. 2. The impact of the activity on any, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated. 4. The activity has a functional need to be located in the area.
Royal Forest and Bird Society of NZ Inc	S110.082	DEV – Developm ent Areas	DEV1-O1	Amend	By increasing residential density of an area, there is a risk that ecological corridors that currently exist could become disjointed, and/or there may be environmental effects. Adding their consideration to this objective ensures they’re taken into account.	Add: 8. Ecological corridors remain intact and there are no adverse environmental effects.
Royal Forest and Bird Society of NZ Inc	S110.083	DEV – Developm ent Areas	DEV1-P2	Amend	By increasing residential density of an area, there is a risk that ecological corridors that currently exist could become disjointed, and/or there may be environmental effects. Adding their consideration to this policy ensures they’re taken into account.	Add: 7. Potential impacts on indigenous biodiversity and ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.084	DEV – Developm ent Areas	DEV1-R1	Amend	By increasing residential density of an area, there is a risk that ecological corridors that currently exist could become disjointed, and/or there may be environmental effects. Adding their consideration to this rule ensures they’re taken into account	Add: 5. There is no adverse impact on indigenous biodiversity and ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.085	DEV – Developm ent Areas	DEV2-O1	Amend	By increasing residential density of an area, there is a risk that ecological corridors that currently exist could become disjointed, and/or there may be environmental effects. Adding	Add: 8. Ecological corridors remain intact and there are no adverse environmental effects.

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					their consideration to this objective ensures they're taken into account.	
Royal Forest and Bird Society of NZ Inc	S110.086	DEV – Developm ent Areas	DEV2-P2	Amend	By increasing residential density of an area, there is a risk that ecological corridors that currently exist could become disjointed, and/or there may be environmental effects. Adding their consideration to this policy ensures they're taken into account.	Add: 7. The avoidance and mitigation of impacts on indigenous biodiversity and ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.087	DEV – Developm ent Areas	DEV1-R1	Amend	This development area contains waterbodies and reserve which is potentially beneficially to indigenous biodiversity and may provide ecological corridors for movements of species. Ensuring these values are protected is important to sustainable development.	Add: General Residential Zone, Medium Density Residential Zone, Large Lot Residential Zone and Neighbourhood Centre Zone 2. There is no adverse impact on indigenous biodiversity and ecological corridors. Add: Rural Lifestyle Zone 1. There is no adverse impact on indigenous biodiversity and ecological corridors.
Royal Forest and Bird Society of NZ Inc	S110.088	DEV – Developm ent Areas	DEV2-R2	Amend	There is no requirement in the plan for setbacks of buildings/structures from SNAs. As this development area contains waterbodies and reserve, which may potentially have (or could in future have) SNAs, the addition of this rule would ensure that buildings/structures are not established within an SNA.	Add: All zones 1. Any building or structure is set back 10 metres from the closest boundary of any Significant Natural Area
Royal Forest and Bird Society of NZ Inc	S110.089	ENRG – Energy	ENRG-Overview	Amend	The full range of biodiversity and ecological effects need to be adequately considered. For example, with wind farms, this would include not just the location of the turbine sites, but also the roading, electricity distribution network/infrastructure, the location of the spoil, the source of water for concrete/dust suppression, gravels and other materials, emissions, the energy costs of building the facility, etc. Renewable electricity generation facilities placed in the wrong area/s, and without adequate assessment of their wider scale and cumulative effects, can have a devastating effect to the environment.	Amend to: Adverse environmental effects, including discharges to air, visual impacts, ~~and~~ noise, and indigenous biodiversity among others can arise from the investigation, development and utilisation of both renewable and non-renewable energy resources. Equally, the development and use of energy resources, including the generation of electricity, can be compromised by the location of incompatible land uses.
Rural Contractors NZ Incorporated (RCNZ)	S145.001	Interpretat ion	Definitions	Amend	RCNZ seek a new rule in GRUZ which should be accompanied by a definition for 'rural contractor depot'.	Include the following definition for 'Rural Contractor Depot': The land and buildings used for the purposes of storing or maintaining machinery, equipment and associated goods and supplies associated with a rural contracting business that directly supports, services or is dependent on primary production.
Rural Contractors NZ Incorporated (RCNZ)	S145.002	UFD – Urban form and developme nt	UFD-O1	Support	RCNZ supports Objective UFD-01, in particular that it provides for managing adverse effects between incompatible activities and zones.	Retain as notified.
Rural Contractors NZ Incorporated (RCNZ)	S145.003	UFD – Urban form and developme nt	UFD-O10	Support	The objective recognises that rural industry is an integral part of primary production which needs to operate efficiently and effectively within the district.	Retain as notified.

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Rural Contractors NZ Incorporated (RCNZ)	S145.004	GRUZ - General Rural Zone	GRUZ-O1	Support	As rural contractor depots fall within 'rural industry' RCNZ supports the recognition of rural industry as an integral part of primary production and its importance to the district.	Retain as notified.
Rural Contractors NZ Incorporated (RCNZ)	S145.005	GRUZ - General Rural Zone	GRUZ-O3	Support	Rural contractor depots support primary production and rely on rural location. The objective provides for such activities and is supported.	Retain as notified.
Rural Contractors NZ Incorporated (RCNZ)	S145.006	GRUZ - General Rural Zone	GRUZ-PREC13-O1	Support	RCNZ supports the establishment of a rural industry precinct which enables larger scale rural industry.	Retain objective as notified.
Rural Contractors NZ Incorporated (RCNZ)	S145.007	GRUZ - General Rural Zone	GRUZ-P2	Support	As rural contractor depots fall within 'rural industry', RCNZ supports the recognition of importance of enabling rural industry in the rural zone.	Retain as notified.
Rural Contractors NZ Incorporated (RCNZ)	S145.008	GRUZ - General Rural Zone	GRUZ-P11	Support	The policy provides for activities that have an operational or functional need to locate in the general Rural Zone (such as rural contractor depots).	Retain as notified.
Rural Contractors NZ Incorporated (RCNZ)	S145.009	GRUZ - General Rural Zone	GRUZ-Additional provisions sought	Amend	GRUZ-R4 and GRUZ-R8 are too restrictive for rural contractor depots. RCNZ seek a new rule permitting small scale rural contractor depots with performance standards.	GRUZ-R4A - Rural Contractor Depot All areas Activity status: Permitted Where: 1. Any new building, structure and activity complies with standards GRUZ-S2, GRUZ-S7 and GRUZ-S8. 2. The rural contractor depot (including associated vehicle access, parking and manoeuvring areas) is set back at least 50m from any side or rear boundary. 3. The rural contractor depot (including associated parking and manoeuvring areas) is set back at least 10m from any road boundary. 4. The activity has no customers coming to site; 5. There are a maximum of 12 staff working on site at any time. 6. Any building must not exceed 3000m2 . Activity status where compliance is not achieved with: GRUZ-R4A(1) to GRUZ-R4A(6): Restricted Discretionary Matters of discretion: 1. Location and scale of the activity. 2. The effects on rural character and amenity values of the surrounding environment. 3. Any potential reverse sensitivity effects and/or conflict with existing activities, and the ability to mitigate these effects. 4. Services. 5. Safety and suitability of access and effects on the transport network from additional traffic generation. 6. The matters of discretion of any infringed standard.
Rural Contractors NZ Incorporated (RCNZ)	S145.010	GRUZ - General Rural Zone	GRUZ-R4	Support in part	Relatively large buildings are required for storage associated with rural contractor depots. When rural contractor depots fall under 'rural industry' the rules/standards are too restrictive for the activity. RCNZ considers GRUZ-R4 unreasonably restrictive for any other 'rural industry' and seeks a number of amendments.	Seeks amendment so that GRUZ-R4 does not apply to rural contractor depots. Amend GRUZ-R4 as follows: Rural Industry (excluding a Rural Contractor Depot) Activity status: PermittedWhere: 1. Any new building, structure and activity complies with standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8. 2. There are no more than 20 customers coming to site on any day. 3. The activity is set back 100m from any side or rear

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					Multiple cross references to other standards are unnecessary.	boundary. 4. ~~The activity~~ Any building or structure is setback at least 10m from any road boundary. 5. There are a maximum of 12 staff working on-site at any point in time. 6. Any building must not exceed ~~The activity is over an area no greater than 13000m2.~~ Retain the restricted discretionary activity status where compliance is not achieved with GRUZ-R4(1) to GRUZ-R4(6).
Rural Contractors NZ Incorporated (RCNZ)	S145.011	GRUZ - General Rural Zone	GRUZ-R8	Support in part	If GRUZ-R8 applies to a rural contractor depot, there's currently a duplication of permitted activity rules because GRUZR4 also applies (as a rural contractor depot would be defined as a "rural industry"). GRUZ-R8 is too restrictive for rural contractor depots.	Industrial Activities (Including Light Industrial Activities but Excluding Rural Contractor Depots) Activity status: Permitted Where: 1. The activity is a contractor yard (excluding rural contractor depots) or the activity involves the manufacturing of primary produce produced on site (excluding activities that are defined as rural industry); and 2. The activity has no customers coming to site; and 3. The activity is set back at least 100m from any side or rear boundary; and 4. Is setback at least 50m from any road boundary; and 5. Has a maximum of 12 staff that work on-site at any one time; and 6. The activity is no greater then 500m2 ; and 7. Any new or extended building, structure and activity complies with General Rural Zone standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GRUZ-S5, GRUZ-S6, GRUZ-S7 and GRUZ-S8.
Rural Ratepayers Group	S143.001	PA – Public Access	PA - General	Amend	Recognize that hazards are inherent in the Rural Zone. For example, bulls, livestock, electric fencing etc to the public who access streams and rivers. br /How do landowners give H&S briefings to visitors who are publicly accessing farmland courtesy of Councils empowerment? br /Some view rural areas as 'nature' although it is an industry in its own right.	Council shall ensure public are aware of all risk and dangers. Council shall indemnify landowners for any risk or harm that may occur to a member of the public as Council is encouraging & ecpediting public access.
Rural Ratepayers Group	S143.002	GRUZ - General Rural Zone	GRUZ - General	Amend	When logging trucks are travelling on gravel roads with heavy traffic dust suppression by water trucks should be required. The traffic dust cause livestock health issues and coats the pasture reducing grass growth. br /Forests are becoming larger as off-shore business off-set their pollution. Forests that are too close to neighbouring sites create tree root travel past boundaries to extract nutrients, shading onto neighbouring sites and trees can fall on to fences.	Greater setbacks for forests from property boundaries. Dust suppression by water tank when logging trucks are travelling on gravel roads and traffic is heavy.
Rural Ratepayers Group	S143.003	NFL – Natural Features and Landscapes	NFL - General	Amend	Light stocking rates benefit tussocks, heavy stocking degrades and harms the resource. br /	In areas of significant natural tussock, i.e. high country, discourage heavy stocking rates.

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Rural Ratepayers Group	S143.004	PA – Public Access	PA - General	Amend	Rural business is an industry and public access produces costs and risks, for example stock can get onto roads if gates are left open, endangering life. Other risks are associated with travellers from overseas that may deposit material containing foot and mouth which would devastate NZ economy.	Where Council imposes Public Access on landowners, a discount on rating should be given as relief on behalf of the community that benefits. Council shall repair any damage to rural properties. Council shall accept responsibility as it is an exacerbator .
Rural Ratepayers Group	S143.005	NH – Natural Hazards	NH-O1	Amend	Recognize that hazards are inherent in the Rural Zone. For example, bulls, livestock, electric fencing etc to the public who access streams and rivers.br /How do landowners give H&S briefings to visitors who are publicly accessing farmland courtesy of Councils empowerment?br /Some view rural areas as 'nature' although it is an industry in its own right.	Council shall ensure public are aware of all risk and dangers.Council shall indemnify landowners for any risk or harm that may occur to a member of the public as Council is encouraging & expediting public access.
Rural Ratepayers Group	S143.006	NH – Natural Hazards	NH-O2	Amend	Recognize that hazards are inherent in the Rural Zone. For example, bulls, livestock, electric fencing etc to the public who access streams and rivers.br /How do landowners give H&S briefings to visitors who are publicly accessing farmland courtesy of Councils empowerment?br /Some view rural areas as 'nature' although it is an industry in its own right.	Council shall ensure public are aware of all risk and dangers.Council shall indemnify landowners for any risk or harm that may occur to a member of the public as Council is encouraging & expediting public access.
Rural Ratepayers Group	S143.007	GRUZ - General Rural Zone	GRUZ-O5	Amend	When logging trucks are travelling on gravel roads with heavy traffic dust suppression by water trucks should be required. The traffic dust cause livestock health issues and coats the pasture reducing grass growth.br /Forests are becoming larger as off-shore business off-set their pollution. Forests that are too close to neighbouring sites create tree root travel past boundaries to extract nutrients, shading onto neighbouring sites and trees can fall on to fences.	Greater setbacks for forests from property boundaries.Dust suppression by water tank when logging trucks are travelling on gravel roads and traffic is heavy.
Rural Ratepayers Group	S143.008	GRUZ - General Rural Zone	GRUZ-P3	Amend	When logging trucks are travelling on gravel roads with heavy traffic dust suppression by water trucks should be required. The traffic dust cause livestock health issues and coats the pasture reducing grass growth.br /Forests are becoming larger as off-shore business off-set their pollution. Forests that are too close to neighbouring sites create tree root travel past boundaries to extract nutrients, shading onto neighbouring sites and trees can fall on to fences.	Greater setbacks for forests from property boundaries.Dust suppression by water tank when logging trucks are travelling on gravel roads and traffic is heavy.
Rural Ratepayers Group	S143.009	NFL – Natural Features and Landscapes	NFL-P1	Amend	Light stocking rates benefit tussocks, heavy stocking degrades and harms the resource.	In areas of significant natural tussock, i.e. high country, discourage heavy stocking rates.

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Rural Ratepayers Group	S143.010	PA – Public Access	PA-O1	Amend	Rural business is an industry and public access produces costs and risks, for example stock can get onto roads if gates are left open, endangering life. Other risks are associated with travellers from overseas that may deposit material containing foot and mouth which would devastate NZ economy.	Where Council imposes Public Access on landowners, a discount on rating should be given as relief on behalf of the community that benefits. Council shall repair any damage to rural properties. Council shall accept responsibility as it is an exacerbator.
Rural Ratepayers Group	S143.011	PA – Public Access	PA-O2	Oppose in part	Rural business is an industry and public access produces costs and risks, for example stock can get onto roads if gates are left open, endangering life. Other risks are associated with travellers from overseas that may deposit material containing foot and mouth which would devastate NZ economy.	Where Council imposes Public Access on landowners, a discount on rating should be given as relief on behalf of the community that benefits. Council shall repair any damage to rural properties. Council shall accept responsibility as it is an exacerbator.
Rural Ratepayers Group	S143.012	PA – Public Access	PA-O3	Amend	Rural business is an industry and public access produces costs and risks, for example stock can get onto roads if gates are left open, endangering life. Other risks are associated with travellers from overseas that may deposit material containing foot and mouth which would devastate NZ economy.	Where Council imposes Public Access on landowners, a discount on rating should be given as relief on behalf of the community that benefits. Council shall repair any damage to rural properties. Council shall accept responsibility as it is an exacerbator.
Rural Ratepayers Group	S143.013	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.
Rural Ratepayers Group	S143.014	Interpretation	abrasive blasting	Support	Adopts the National Planning Standard definition	Retain as notified
Rural Ratepayers Group	S143.015	Interpretation	access strip	Support	Adopts the Resource Management Act 1991 definition.	Retain as notified
Rural Ratepayers Group	S143.016	Interpretation	additions	Support	This definition relates specifically to historic heritage therefore provides clarity for the reader.	Retain as notified
Rural Ratepayers Group	S143.017	Interpretation	agricultural aviation activity	Oppose	SFF support the inclusion of a definition, however greater clarity and detail is required.	~~means the use of aircrafts or helicopters used ancillary and in association with primary production.~~ Agricultural aviation activity means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed wing aeroplanes, helicopters, and unmanned aerial vehicles
Rural Ratepayers Group	S143.018	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
Rural Ratepayers Group	S143.019	Interpretation	ancillary activity	Support	The notified definition follows the National Planning Standards.	Retain as notified

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
Rural Ratepayers Group	S143.020	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 non-residential interior~~ lighting and/or sign that emits directly into the outdoor environment. ~~and includes signs.~~
Rural Ratepayers Group	S143.021	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)~~
Rural Ratepayers Group	S143.022	Interpretation	bore	Support	The notified definition follows the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.023	Interpretation	building	Support	The notified definition follows the National Planning Standards	Retain as notified
Rural Ratepayers Group	S143.024	Interpretation	Definitions	Support	SFF recommends the Council include a definition for collector road.	Include new definition (Collector Road) and make any necessary consequential amendments.
Rural Ratepayers Group	S143.025	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.
Rural Ratepayers Group	S143.026	Interpretation	cultivation	Support	The notified definition follows the National Planning Standards	Retain as notified
Rural Ratepayers Group	S143.027	Interpretation	dead holes	Support	SFF supports the inclusion of this definition.	Retain as notified
Rural Ratepayers Group	S143.028	Interpretation	earthworks	Support	The notified definition follows the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.029	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
Rural Ratepayers Group	S143.030	Interpretation	farm track	Support	This definition captures the normal use of a farm track.	Retain as notified

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Rural Ratepayers Group	S143.031	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.~~
Rural Ratepayers Group	S143.032	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.
Rural Ratepayers Group	S143.033	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.
Rural Ratepayers Group	S143.034	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
Rural Ratepayers Group	S143.035	Interpretation	functional need	Support	The notified definition follows the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.036	Interpretation	highly productive land	Support	The notified definition follows the National Policy Statement for Highly Productive Land.	Retain as notified
Rural Ratepayers Group	S143.037	Interpretation	indigenous vegetation	Support	The notified definition follows the National Policy Statement for Indigenous Biodiversity.	Retain as notified
Rural Ratepayers Group	S143.038	Interpretation	indigenous vegetation clearance	Oppose in part	As drafted, the definition does not provide for excluding grazing as it states 'clearing or removal of indigenous vegetation by any means'. Farmers graze in and around areas of indigenous vegetation or indigenous vegetation may be scattered amongst pasture which may result in some of the indigenous vegetation being 'cleared' pursuant to the current proposed definition. Indigenous vegetation and grazing can co-exist and is often considered good management practice in terms of fire protection and assisting with regeneration. It is not clear what is meant by 'overplanting'. Where the vegetation is within areas of improved pasture, especially on hill country, overplanting (e.g. by helicopter) followed by grazing to trample in the seed is common practice and allows for pasture renewal. It is crucial that this be removed from the definition.	Amend definition and make any necessary consequential amendments: Means the clearing or removal of indigenous vegetation by any means, including cutting, crushing, cultivation, irrigation, chemical application, drainage, stopbanking, , burning or any other mechanical means. ~~as well as mob stocking.~~ It does not include grazing of pasture or improved pasture species in that area of indigenous vegetation.
Rural Ratepayers Group	S143.039	Interpretation	intensive indoor primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.040	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.

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Rural Ratepayers Group	S143.041	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 .
Rural Ratepayers Group	S143.042	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
Rural Ratepayers Group	S143.043	Interpretation	minor residential unit	Support	The notified definition follows the National Planning Standards	Retain as notified
Rural Ratepayers Group	S143.044	Interpretation	modify	Support	The notified definition makes clear that ‘modify’ is in relation to an archaeological site	Retain as notified
Rural Ratepayers Group	S143.045	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
Rural Ratepayers Group	S143.046	Interpretation	noise	Support	Support as definition has the same meaning as section 2 of the RMA.	Retain as notified
Rural Ratepayers Group	S143.047	Interpretation	noise sensitive activity	Support	SFF supports the activities listed as noise sensitive.	Retain as notified
Rural Ratepayers Group	S143.048	Interpretation	notional boundary	Support	The notified definition follows the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.049	Interpretation	plantation forestry	Support	The notified definition follows the National Environmental Standards for Plantation Forestry	Retain as notified
Rural Ratepayers Group	S143.050	Interpretation	primary production	Support	The notified definition follows the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.051	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’.
Rural Ratepayers Group	S143.052	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.
Rural Ratepayers Group	S143.053	Interpretation	river	Support	Support as has the same meaning as the RMA.	Retain as notified

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Rural Ratepayers Group	S143.054	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
Rural Ratepayers Group	S143.055	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.
Rural Ratepayers Group	S143.056	Interpretation	rural industry	Support	Support as has the same meaning as the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.057	Interpretation	sensitive activity	Support	SFF agrees with the list of sensitive activities.	Retain as notified
Rural Ratepayers Group	S143.058	Interpretation	sign	Support	Support the definition of ‘sign’ which has the same meaning as per the National Planning Standards.	Retain as notified
Rural Ratepayers Group	S143.059	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.
Rural Ratepayers Group	S143.060	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 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	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.~~

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
					in partnership with Local Authorities, Government agencies, mana whenua, stakeholders and landowners to identify and protect Significant Natural Areas’. Full reason pg. 21	
Rural Ratepayers Group	S143.061	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
Rural Ratepayers Group	S143.062	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.
Rural Ratepayers Group	S143.063	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.
Rural Ratepayers Group	S143.064	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
Rural Ratepayers Group	S143.065	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.

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Rural Ratepayers Group	S143.066	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.~~
Rural Ratepayers Group	S143.067	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.
Rural Ratepayers Group	S143.068	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.
Rural Ratepayers Group	S143.069	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.
Rural Ratepayers Group	S143.070	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.
Rural Ratepayers Group	S143.071	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.
Rural Ratepayers Group	S143.072	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.
Rural Ratepayers Group	S143.073	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 regional plans and therefore the duplication contained in the PDP must be removed.	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).

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
Rural Ratepayers Group	S143.074	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.
Rural Ratepayers Group	S143.075	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.
Rural Ratepayers Group	S143.076	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.
Rural Ratepayers Group	S143.077	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.
Rural Ratepayers Group	S143.078	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.
Rural Ratepayers Group	S143.079	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 ’

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Rural Ratepayers Group	S143.080	NH – Natural Hazards	NH-P7	Support	Support is given as this policy provides a nonregulatory approach.	Retain NH-P7 as drafted.
Rural Ratepayers Group	S143.081	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
Rural Ratepayers Group	S143.082	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;
Rural Ratepayers Group	S143.083	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...
Rural Ratepayers Group	S143.084	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...
Rural Ratepayers Group	S143.085	HH – Historical Heritage	HH-P14	Support	It is important to encourage non-regulatory methods for heritage conservation.	Retain HH-P14 as drafted.
Rural Ratepayers Group	S143.086	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.
Rural Ratepayers Group	S143.087	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.
Rural Ratepayers Group	S143.088	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.
Rural Ratepayers Group	S143.089	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	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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					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.	
Rural Ratepayers Group	S143.090	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.
Rural Ratepayers Group	S143.091	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).
Rural Ratepayers Group	S143.092	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.
Rural Ratepayers Group	S143.093	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 .
Rural Ratepayers Group	S143.094	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	Amend ECO-O4: 3. ‘enabling customary use upon landowner consent ’

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					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.	
Rural Ratepayers Group	S143.095	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.
Rural Ratepayers Group	S143.096	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;
Rural Ratepayers Group	S143.097	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.
Rural Ratepayers Group	S143.098	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.
Rural Ratepayers Group	S143.099	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.
Rural Ratepayers Group	S143.100	ECO – Ecosystems and Indigenous	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	Amend ECO-P8: When assessing consents for subdivision, use and development within SNAs , avoid effects which will: (...)

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
		Biodiversity			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.	
Rural Ratepayers Group	S143.101	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 the complexities of environmental and social challenges effectively. It is also recommended that this policy provide for lawfully established activities.	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.
Rural Ratepayers Group	S143.102	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.
Rural Ratepayers Group	S143.103	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: (...)
Rural Ratepayers Group	S143.104	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	Include a definition of exotic weed.

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					considered to be a weed by some while its growth is encouraged by others (especially within rural communities).	
Rural Ratepayers Group	S143.105	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.
Rural Ratepayers Group	S143.106	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, 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	Include a definition for ‘lawfully established’ (if that is the intention) or remove italics. Amend ECO-R1: Where: 1. It is necessary for the following purposes: (a) The maintenance, repair or replacement or upgrade of existing lawfully established: (i) fences and farm fences (ii) vehicle and farm tracks; (...) (ix) network utilities and ~~the clearance or land disturbance is no more than 1.0m in width from those works in (ii), (iii), (iv), (v), (vii), (viii) and (ix), and 1.5m for (i) and (vi)–(...)~~ (e) Maintenance of improved pasture where: (i) the improved pasture has not become a mapped SNA, and (...) emNOTE - 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./em
Rural Ratepayers Group	S143.107	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.
Rural Ratepayers Group	S143.108	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.
Rural Ratepayers Group	S143.109	ECO – Ecosystems and Indigenous	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	Include new rule providing for indigenous vegetation clearance for any purpose other than contained in ECOR1(1) or (3) as a permitted activity.

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		Biodiversity			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.	
Rural Ratepayers Group	S143.110	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.
Rural Ratepayers Group	S143.111	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.
Rural Ratepayers Group	S143.112	NFL – Natural Features and Landscapes	NFL-P2	Support in part	The purpose of NFL-P2 is supported however we have some concerns with the interpretation of angling fisheries species. It is requested that this be updated to refer to native fish species.	Amend NFL-P2: Provide for and encourage the restoration and/or enhancement of the natural character of the Te Au Nui Pihapiha Kanakana Mataura Falls where: 1. Restoration and/or enhancement will achieve long-term improvement in natural character, landscape and associated Ngāi Tahu cultural values; and/or 2. It will assist in the restoration of indigenous biodiversity or ecosystems and angling and native fisheries species;
Rural Ratepayers Group	S143.113	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
Rural Ratepayers Group	S143.114	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.
Rural Ratepayers Group	S143.115	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	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)

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					support farming activities, such as mustering huts or pump stations.	
Rural Ratepayers Group	S143.116	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.
Rural Ratepayers Group	S143.117	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 100m2 in a 12-month periodSFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month period. SFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural	Amend NFL-R3: Land disturbance and Earthworks within an identified ONF/L (excluding for the laying of stockwater, drainage or other utility pipes, or stock exclusion) Activity status: Permitted Where: 1. The depth of the earthworks shall not exceed ~~12m~~ below the original surface of the ground; and 2. the ~~depth~~ height of fill or stockpiles shall not exceed ~~13m~~ above the original surface of the ground; and 3. the area of the earthworks shall not exceed 100m2 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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					activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month periodSFF supports the need for some controls over the scale, location, and form of earthworks within ONF/Ls. Small-scale earthworks associated with most activities likely to occur in rural areas are provided for in this rule, however we suggest the inclusion of some additional activities to ensure rural activities can occur. We also suggest that unreasonable restrictions, such as the width for land disturbance for fencing, are removed. Regional council stock exclusion requirements determine that farmers will need to carry out earthworks which may exceed the proposed 100m2 in a 12-month period. To ensure that farmers can meet these regional council requirements, land disturbance for stock exclusion (including stock water installation / upgrade to enable stock exclusion) should be excluded from this rule. Beyond stock exclusion requirements: earthworks may be required for drainage, upgrades / repairs to stock water schemes. There should not be an annual limit to this work as it is not practical to stop the work once 100m of drain / pipe has been laid. If drains / water pipe are being laid, they need to be laid to the extent of that required to complete the job.	
Rural Ratepayers Group	S143.118	NFL – Natural Features and Landscape s	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.
Rural Ratepayers Group	S143.119	NFL – Natural Features and Landscape s	NFL-R5	Support in part	Fencing is important for keeping out stock or pests from native bush and waterways, therefore provides a positive effect. SFF is unsure why the Council would limit the fencing type to only post and wire as permitted. Other types of fencing, such as post and rail or waratah fencing, require a resource consent as currently drafted. It is our view that farmers should not have to apply for a resource consent where fencing is for the purposes of keeping out stock or pests. Such a requirement will impact on farmers’ ability to carry out day-to-to farming operations. We have made earlier comments on the definition of fencing, to ensure that all types of fences are included We	Amend NFL-R5: Activity status: Permitted Where: 1. The fence is a farm fence ~~Note: fences are a structure and therefore subject to the river setback rules.~~ Activity Status where ~~compliance is not achieved:Restricted discretionary~~ Matters of discretion:1. Effects on the values listed within NFL-APP Appendix 5.2. Impacts on Ngāi Tahu cultural values, including those listed in MW – 2.3.

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					have proposed a new definition for ‘farm fences’ and it is crucial this is adopted to ensure NFL-R5 achieves the intended purpose.	
Rural Ratepayers Group	S143.120	NFL – Natural Features and Landscapes	NFL-R6	Oppose	SFF request this rule is deleted as it duplicates ECO-R1.	Delete NFL-R6
Rural Ratepayers Group	S143.121	NFL – Natural Features and Landscapes	NFL-R6	Oppose	SFF assume this rule should be NFL-R7. However, if NFL-R6 (above) is deleted then this rule will remain NFL-R6. It is important for farmers to be able to develop/erect farm fences, new roads/farm tracks when needed. Such reasons could include supporting the safe transfer of animals, changes to landscape caused by extreme weather and health and safety. We do not agree with this being a restricted discretionary activity and request this is changed to permitted.	Amend NFL-R6: 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.~~
Rural Ratepayers Group	S143.122	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~~
Rural Ratepayers Group	S143.123	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.
Rural Ratepayers Group	S143.124	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.
Rural Ratepayers Group	S143.125	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	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.

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					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.	
Rural Ratepayers Group	S143.126	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
Rural Ratepayers Group	S143.127	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.
Rural Ratepayers Group	S143.128	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~~
Rural Ratepayers Group	S143.129	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.
Rural Ratepayers Group	S143.130	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.
Rural Ratepayers Group	S143.131	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.
Rural Ratepayers Group	S143.132	SUB - Subdivision	SUB-S1	Support in part	SFF supports increasing the minimum lot size in the rural zone to 8ha. In the interests of protecting highly productive land and ensuring that the district maintains suitably sized working farms, 8ha is a reasonable minimum lot size for the rural zone. We agree with the s 32 report which states that the current 2ha minimum lot size could result in ‘the loss of	Retain SUB-S1 as drafted.

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
					highly productive land and farmland available for primary production’.	
Rural Ratepayers Group	S143.133	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.
Rural Ratepayers Group	S143.134	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.
Rural Ratepayers Group	S143.135	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.
Rural Ratepayers Group	S143.136	EW - Earthworks	EW-R8	Support	Support is given for earthworks for silage pits being a permitted activity.	Retain EW-R8 as notified.
Rural Ratepayers Group	S143.137	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
Rural Ratepayers Group	S143.138	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.
Rural Ratepayers Group	S143.140	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.
Rural Ratepayers Group	S143.141	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.
Rural Ratepayers Group	S143.142	LIGHT – Light	LIGHT-Additional	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	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.

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			provisions sought		some parts of the year where farmers must work well past normal working hours to process their goods.	
Rural Ratepayers Group	S143.143	NOISE – Noise	NOISE-O1	Support	This objective identifies that within different zones, different levels of noise will be appropriate.	Retain NOISE-O1 as notified.
Rural Ratepayers Group	S143.144	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.
Rural Ratepayers Group	S143.145	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 (...)
Rural Ratepayers Group	S143.146	NOISE – Noise	NOISE - General	Support	NCFF supports Note 2: #9 which provides for an exemption for agriculture, horticulture and pastoral farming activities. However, it is suggested that audible bird scaring device’ is included here, and a corresponding definition included.	Amend NOISE-Note 2 #9: 9. Noise from vehicles, machinery or equipment undertaking agricultural, horticultural and pastoral activities including noise from stock, other outdoor animals and working dogs, and audible bird scaring devices but excluding noise from stationary processing activities.
Rural Ratepayers Group	S143.147	Interpretation	Definitions	Support	With regards to Noise- Note 2; NCFF supports ‘audible bird scaring device’ being defined	Include a definition for ‘audible bird scaring device’ as: ‘Gas guns and avian distress alarms used for the purposes of disturbing or scaring birds’
Rural Ratepayers Group	S143.148	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 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.~~
Rural Ratepayers Group	S143.149	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.
Rural Ratepayers Group	S143.150	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~~ ;—(...)

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Rural Ratepayers Group	S143.151	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.
Rural Ratepayers Group	S143.152	GRUZ - General Rural Zone	GRUZ-Overview and Purpose	Support in part	In the Gore District, there are farmers whose families have been farming the land for many generations. They value their land and have developed an intergenerational culture which must be preserved alongside other cultural and historical aspects identified in the District Plan as of importance. SFF believes that heritage resources help to teach us about the past and the cultures of those who came before us, but we note that this seldomly appropriately reflects rural or pastoral heritage and culture as ‘valued’. There is an opportunity as part of this process to celebrate the district’s rural heritage and the history of our early pioneering farmers.	Amend Overview and Purpose: The purpose of the General Rural Zone is to provide for and protect rural production activities and other activities that rely on the rural resource. The General Rural Zone is the largest zone in the District and this land resource underpins the economic, ~~and~~ social and cultural well-being of the District.
Rural Ratepayers Group	S143.153	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.
Rural Ratepayers Group	S143.154	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.
Rural Ratepayers Group	S143.155	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.
Rural Ratepayers Group	S143.156	GRUZ - General Rural Zone	GRUZ-O4	Support	SFF supports the preservation of the purpose and character of the GRUZ.	Retain GRUZ-O4 as notified.
Rural Ratepayers Group	S143.157	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.
Rural Ratepayers Group	S143.158	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.
Rural Ratepayers Group	S143.159	GRUZ - General Rural Zone	GRUZ-P2	Support	It is appropriate to include a separate policy enabling rural industry activities.	Retain GRUZ-P2 as notified.

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Rural Ratepayers Group	S143.160	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.
Rural Ratepayers Group	S143.161	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.
Rural Ratepayers Group	S143.162	GRUZ - General Rural Zone	GRUZ-P6	Support	SFF supports this policy.	Retain GRUZ-P6 as notified.
Rural Ratepayers Group	S143.163	GRUZ - General Rural Zone	GRUZ-P7	Support in part	SFF support the enablement of agricultural aviation activities and acknowledge the potential reverse sensitivity effects. However, as stated in comments on the NOISE chapter, SFF do not support limitations on agricultural aviation activities.	Amend GRUZ-P7: Enable agriculture aviation activities, and rural airstrips to support primary production and conservation activities., whilst managing the noise effects through controlling the location of airstrips and scale of their use.
Rural Ratepayers Group	S143.164	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.
Rural Ratepayers Group	S143.165	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.
Rural Ratepayers Group	S143.166	GRUZ - General Rural Zone	GRUZ-P10	Support	Protection of highly productive land is supported.	Retain GRUZ-P10 as notified.
Rural Ratepayers Group	S143.167	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.
Rural Ratepayers Group	S143.168	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 (...)
Rural Ratepayers Group	S143.169	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.
Rural Ratepayers Group	S143.170	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	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;

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					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.	
Rural Ratepayers Group	S143.171	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;~~
Rural Ratepayers Group	S143.172	GRUZ - General Rural Zone	GRUZ-R12	Oppose in part	SFF does not believe the Council should restrict the hours of operation in the requirements. So long as the business meet Health and Safety and Employment laws, we think this rule is unnecessary. A home business may operate at any hour of the day, as is the nature of online businesses with international networks/customers. Furthermore, it is unnecessary to limit the time in which vehicles may be loaded or unloaded for a home businesses in a rural environment where disturbance is unlikely. This rule is over regulatory.	Amend GRUZ-R12 to remove: ~~3. Hours of operation are limited to between the hours 0700 and 1900; and 4. Unloading or loading of vehicles or the receiving of customers or deliveries only occur between the 0700 and 1900.~~
Rural Ratepayers Group	S143.173	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.~~
Rural Ratepayers Group	S143.174	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.
Rural Ratepayers Group	S143.175	GRUZ - General Rural Zone	GRUZ-S5	Oppose in part	SFF supports this standard but requests an update from the boundary of an intergenerational connector road.	Amend GRUZ-S5: Any building or structure is setback from any road boundary the minimum distances as follows: 1. Residential buildings are setback: (a) ~~100~~ 50m from the boundary of an Interregional Connector road (state highway); (b) 40m from the boundary of a Rural Connector road; (c) 30m from the road boundary of an unsealed road; and (...)

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Rural Ratepayers Group	S143.176	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:
Rural Ratepayers Group	S143.177	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.
Rural Ratepayers Group	S143.178	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.
Rural Ratepayers Group	S143.179	RLZ – Rural Lifestyle Zone	RLZ-O2	Support in part	We suggest this objective is reworded as the intention is not clear.	Reword RLZ-O2.
Rural Ratepayers Group	S143.180	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.~~
Rural Ratepayers Group	S143.181	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.
Rural Ratepayers Group	S143.182	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.
Rural Ratepayers Group	S143.183	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
Rural Ratepayers Group	S143.184	RLZ – Rural Lifestyle Zone	RLZ-R3	Support in part	The maximum occupancy prescribed by this rule is 5 persons. This is overly restrictive as a homestay in a rural environment is unlikely to cause adverse effects. Furthermore, 5 persons is an odd number as it does not allow for multiple couples. Farmstays may offer a homestay as part of their business and this rule must accommodate for this. If a fourbedroom hours is utilised as a homestay there could be three bedrooms available, sleeping six people. Allowing for eight people would adequately capture a farmstay.	Amend RLZ-R3: 3. The maximum occupancy does not exceed ~~5~~ 8 persons.

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Rural Ratepayers Group	S143.185	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
Rural Ratepayers Group	S143.186	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.
Rural Ratepayers Group	S143.187	Whole Plan	Whole Plan	Not Stated	The Sites and Areas of Significance to Māori (SASM) chapter employs an approach whereby the entire District is considered a ‘site’. The s 32 report refers to a trigger approach, with resource consent applications acting as ‘triggers’ for the Council to consider the impact on Ngāi Tahu cultural values. SFF acknowledges the Māori view of guardianship over land, areas of interest and landscapes. However, the rights of landowners are paramount and must be prioritised. The plan’s approach to requiring assessment against cultural values for consents for normal farming operations will only drive conflict as it regulates and restricts even the most minor activities. See page 3/4 and Appendix A for complete submission	We have assessed the Plan and identified that there are 91 rules or standards which include a matter of discretion and/or control as assessment against Ngāi Tahu cultural values (Appendix 1). We assume that the Council considers all of these 91 rules/standards as ‘high risk’ and therefore requiring assessment against cultural values. In this respect, we feel that the s 32 report has not accurately captured the councils intent to not hinder farming operations by triggering cultural assessment for day-to-day primary production activities.
Rural Ratepayers Group	S143.188	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	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.

Original submitter name	Submission Point Number	Plan section	Plan provision	Support/oppose	Reasons	Decision Requested
					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.	
Rural Ratepayers Group	S143.189	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
Rural Ratepayers Group	S143.190	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
Rural Ratepayers Group	S143.191	Whole Plan	Whole Plan	Not Stated	The Efficiency and Effectiveness Report 2022 recommends the ability to collect financial contributions be incorporated into the District Plan. SFF strongly supports the use of financial contributions to fund infrastructure. The concept of ‘growth pays for growth’ is relevant because in the instance where financial contributions are not in place it is farmers who pay the majority share of infrastructure as a major contributor to rates. A targeted financial contribution system ensures that developers pay their fair share towards new infrastructure, for example as growth occurs in greenfield areas.	We note that the Plan does not include Financial Contributions and while we appreciate it may be ‘best practice’ to leave these out of District Plans, we recommend the Council enables Financial Contributions through another means such as a financial contributions policy.
Rural Ratepayers Group	S143.192	Whole Plan	Whole Plan	Amend	The Plan communicates the RMA requirements regarding existing use rights, as per s 10 and 10A. However, we find the application of both ‘existing use rights’ and ‘lawfully established’ to be inconsistent throughout the Plan with neither term being defined.	The terms existing use rights or lawfully established should be used consistent throughout the Plan and be defined.
Rural Ratepayers Group	S143.193	Whole Plan	Whole Plan	Amend	Throughout the Plan, ‘well-being’ is referred to as wellbeing. Under both the Local Government Act 2002 and the Resource Management Act 1991 this is captured as ‘well-being’. The Plan should align with the legislation.	Change wellbeing to well-being
Rural Ratepayers Group	S143.194	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’.
Rural Ratepayers Group	S143.195	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

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						military training activities and emergency services training activities provided that the level, timing and duration of noise is reasonable.
Rural Ratepayers Group	S143.196	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.