

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S126.003	Southland Federated Farmers of New Zealand	Interpretation	access strip	Support	Retain as notified	Adopts the Resource Management Act 1991 definition.	Accept
S115.004	Kevin Robertson	Interpretation	access strip	Support	Retain as notified	Adopts the Resource Management Act 1991 definition.	Accept
S143.015	Rural Ratepayers Group	Interpretation	access strip	Support	Retain as notified	Adopts the Resource Management Act 1991 definition.	Accept
S148.016	Alistair & Bernadette Hunt	Interpretation	access strip	Support	Retain as notified	Adopts the Resource Management Act 1991 definition.	Accept
S60.006	Ronald Crispin	Interpretation	access strip	Support	Retain as notified	Adopts the Resource Management Act 1991 definition.	Accept
S68.124	John Baynes	Interpretation	access strip	Support	Retain as notified	Adopts the Resource Management Act 1991 definition.	Accept
S101.065	Transpower New Zealand Limited	SUB - Subdivision	SUB-Additional provisions sought	Oppose	Amend the subdivision rules to include the following new rule: SUB-RX Subdivision for network utilities: All Zones: Activity status: permitted Where: 1. The subdivision creates an allotment for the purpose of any unstaffed network utilities, accessway or road. Activity status where compliance not achieved: N/A	Opposes the rules that relate to subdivision on the basis that the rules do not include a rule that provides for the creation of an allotment for the purposes of accommodating a network utility. This is a common approach in many district plans and allows for the rule to include relaxed standards on the basis that network utilities have different characteristics and needs in terms of size and servicing and broad benefits to the community.	Accept in part
S101.066	Transpower New	SUB - Subdivision	SUB-Additional provisions sought	Oppose	Include the new rule: SUB-RX Subdivision in the National Grid Subdivision Corridor: All Zones: Activity status:	Transpower opposes the Rules that related to subdivision on the basis that the rules do not include a rule that addresses subdivision in the	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	Zealand Limited				restricted discretionary Where: 1. a building platform is identified on the subdivision plan that is outside of the National Grid Yard, to be secured by way of a consent notice. Matters of discretion 1. The extent to which the subdivision allows for earthworks, buildings and structures to comply with the requirements of NZECP34:2001. 2. The provision for the ongoing efficient operation, maintenance, development and upgrade of the National Grid, including the ability for continued reasonable access to existing transmission lines for maintenance, inspections and upgrading. 3. The extent to which potential adverse effects (including visual and reverse sensitivity effects) are mitigated through the location of an identified building platform or platforms. 4 The extent to which the design and construction of the subdivision allows for activities to be set back from the National Grid, including the ability to ensure adverse effects on, and from, the National Grid and on public safety and property are appropriately avoided, remedied or mitigated, for example, through the location of roads and reserves under the transmission lines. 5. The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid. 6. The outcome of any consultation	National Grid Subdivision Corridor (defined and addressed earlier in this comments). Transpower seeks the inclusion of a nationally consistent rule that applies in the National Grid Subdivision Corridor.	

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					with Transpower New Zealand Limited. 7. The extent to which the subdivision plan clearly identifies the National Grid and identified building platform or platforms. Notification An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified only to Transpower New Zealand Limited, where the consent authority considers this is required, absent its written approval. Activity status where compliance not achieved: Non-complying		
S154.049	Spark New Zealand Trading Limited	SUB - Subdivision	SUB-Additional provisions sought	Support in part	Add a new rule for subdivision for infrastructure purposes as follows: All Zones - Activity Status: Controlled. Subdivision to create any site to be used solely for the provision of infrastructure. Matters of Control 1 The location, size and design of allotments, building platforms, accessways, right of ways, vehicle crossings, open space and connections to the surrounding area; and 2 the ability to accommodate permitted and/or intended land uses; and 3 the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and 4 measures to avoid, remedy or mitigate adverse effects: of any natural hazards or other risks; and on any sensitive	Infrastructure allotments can have different demands from a subdivision perspective than zone-based subdivision in any given area. Controlled activity subdivision for infrastructure is appropriate, with control to allow for actual and potential adverse effects on the environment to be addressed.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					environments, waterbodies, ecosystems or notable trees; and on infrastructure; and on existing or permitted adjoining or adjacent land uses;		
S32.049	One New Zealand Group Limited	SUB - Subdivision	SUB-Additional provisions sought	Support in part	Add a new rule for subdivision for infrastructure purposes as follows: All Zones - Activity Status: Controlled. Subdivision to create any site to be used solely for the provision of infrastructure. Matters of Control 1 The location, size and design of allotments, building platforms, accessways, right of ways, vehicle crossings, open space and connections to the surrounding area; and 2 the ability to accommodate permitted and/or intended land uses; and 3 the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and 4 measures to avoid, remedy or mitigate adverse effects: of any natural hazards or other risks; and on any sensitive environments, waterbodies, ecosystems or notable trees; and on infrastructure; and on existing or permitted adjoining or adjacent land uses;	Infrastructure allotments can have different demands from a subdivision perspective than zone-based subdivision in any given area. Controlled activity subdivision for infrastructure is appropriate, with control to allow for actual and potential adverse effects on the environment to be addressed.	Accept in part
S33.049	FortySouth	SUB - Subdivision	SUB-Additional provisions sought	Support in part	Add a new rule for subdivision for infrastructure purposes as follows: All Zones - Activity Status: Controlled. Subdivision to create any site to be used solely for the provision of infrastructure. Matters of Control 1 The location, size	Infrastructure allotments can have different demands from a subdivision perspective than zone-based subdivision in any given area. Controlled activity subdivision for infrastructure is appropriate, with control to allow for actual and	Accept in part

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					and design of allotments, building platforms, accessways, right of ways, vehicle crossings, open space and connections to the surrounding area; and 2 the ability to accommodate permitted and/or intended land uses; and 3 the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and 4 measures to avoid, remedy or mitigate adverse effects: of any natural hazards or other risks; and on any sensitive environments, waterbodies, ecosystems or notable trees; and on infrastructure; and on existing or permitted adjoining or adjacent land uses;	potential adverse effects on the environment to be addressed.	
S37.049	Connexa Limited	SUB - Subdivision	SUB-Additional provisions sought	Support in part	Add a new rule for subdivision for infrastructure purposes as follows: All Zones - Activity Status: Controlled. Subdivision to create any site to be used solely for the provision of infrastructure. Matters of Control 1 The location, size and design of allotments, building platforms, accessways, right of ways, vehicle crossings, open space and connections to the surrounding area; and 2 the ability to accommodate permitted and/or intended land uses; and 3 the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and 4 measures to	Infrastructure allotments can have different demands from a subdivision perspective than zone-based subdivision in any given area. Controlled activity subdivision for infrastructure is appropriate, with control to allow for actual and potential adverse effects on the environment to be addressed.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					avoid, remedy or mitigate adverse effects: of any natural hazards or other risks; and on any sensitive environments, waterbodies, ecosystems or notable trees; and on infrastructure; and on existing or permitted adjoining or adjacent land uses;		
S99.005	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-Additional provisions sought	Not Stated	Insert specific provisions for section 226 certificates as permitted activities providing certain criteria are met and clarity as to when s226 certification can be used and when a subdivision consent is needed in a similar vein to Chapter 2.6, rule SUB.1 of the Southland District Plan.	No specific provisions for section 226 certificates could leave this certification process uncertain and open to interpretation.	Accept in part
FS5.114	Hamish Weir			Support	Allow		Accept in part
FS14.019	NZ Transport Agency Waka Kotahi			Support	Allow	The New Zealand Transport Agency supports the approach suggested by this submitter in respect to certification of allotments under Section 226 of the Resource Management Act, as the provision referred to in the Southland District Plan requires the access to the allotment to meet District Plan access standards.	Accept in part
S74.013	Hamish Weir	SUB - Subdivision	SUB-Additional provisions sought	Support	An additional rule is sought as follows; SUB-R4A - Certification of existing allotments under s226 of the RMA 1991 Where; 1. an existing allotment not bound by way of an amalgamation condition or covenant exists in the Cadastre 2. having no less than 3.5m wide frontage to a legal road 3. the site	No reference is made in the PDP to s226 of the RMA. Creating disparity between the Act and the plan. It would be better to deal with this by including a Rule	Accept in part

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					is not subject to any readily identifiable natural hazard Matters of Control 1. The design and provision of access; and 2. The provision, design and construction of infrastructure and services		
FS22.043	Clark Fortune McDonald & Associates			Support	Allow	Support - we agree that the PDP should provide for s226 RMA certification of existing allotments that comply with relevant requirements.	Accept in part
FS14.018	NZ Transport Agency Waka Kotahi			Support in part	Allow in part	The New Zealand Transport Agency (NZTA) agrees that it is appropriate for a rule to be included in the Plan for certification of existing allotments under section 226 of the Resource Management Act (RMA). However, NZTA consider that the permitted activity status of the rule sought should include an additional clause - like has been included in the Southland District Plan - that requires access onto the allotment(s) to comply with the relevant transport standards in the Proposed District Plan, and where that is not achieved, the activity becomes a controlled activity. Allow submission as it relates to a new rule being included in the Plan for certification of allotments under Section 226 of the RMA, but require an additional clause be added to require compliance with Transport access standards.	Accept in part
S35.049	Chorus New Zealand Limited	SUB - Subdivision	SUB-Additional provisions sought	Support in part	Add a new rule for subdivision for infrastructure purposes as follows: All Zones - Activity Status: Controlled. Subdivision to create any site to be used	Infrastructure allotments can have different demands from a subdivision perspective than zone based subdivision in any given area. Controlled activity subdivision for infrastructure is	Accept in part

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					solely for the provision of infrastructure. Matters of Control 1 The location, size and design of allotments, building platforms, accessways, right of ways, vehicle crossings, open space and connections to the surrounding area; and 2 the ability to accommodate permitted and/or intended land uses; and 3 the response to the site's and surrounding areas natural and physical features, character, amenity, constraints and vegetation; and 4 measures to avoid, remedy or mitigate adverse effects: of any natural hazards or other risks; and on any sensitive environments, waterbodies, ecosystems or notable trees; and on infrastructure; and on existing or permitted adjoining or adjacent land uses;	appropriate, with control to allow for actual and potential adverse effects on the environment to be addressed.	
FS21.083	Yrless Limited			Support	Allow	A controlled activity subdivision for infrastructure is appropriate, as the effects can be well quantified. Add a new rule for subdivision to create a controlled activity for any site to be used solely for the provision of infrastructure.	Accept in part
S146.054	Southland District Council	SUB - Subdivision	SUB - General	Support in part	None specified.	The submitter supports the objective and policy additions.	Accept
S140.013	Robina Johnston	SUB - Subdivision	SUB - General	Not Stated	Considers that location, design and construction of infrastructure for subdivision should be in collaboration with all parties concerned when applying		Accept

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					for consent to achieve suitable results.		
S99.016	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB - General	Not Stated	Activity status where compliance not achieved is reworded to be a discretionary status	A non-complying activity status is considered to be a test which is impractical and inappropriate for the general nature of breaches to this requirement.	Accept in part
FS5.70	Hamish Weir			Support	Allow		Accept in part
S132.053	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-01	Support	Retain SUB-01 as proposed.	Supports facilitating the orderly subdivision and development in land.	Accept
S132.054	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-02	Support	Retain SUB-02 as proposed.	Supports ensuring subdivision achieves patterns of land development that are compatible with purpose, function, character and qualities of each zone.	Accept
S132.055	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-03	Amend	Amend SUB-03 as follows: Infrastructure required to serve the subdivision of land is provided in an integrated, efficient and coordinated manner. Existing infrastructure has capacity or is upgraded to serve the subdivision.	KiwiRail supports the purpose of the objective but recommends rewording or providing a new objective that protects existing infrastructure from demand of increased capacity through subdivision.	Reject
S154.041	Spark New Zealand Trading Limited	SUB - Subdivision	SUB-03	Support	Retain SUB-03 as notified	SUB-03 clearly sets out that infrastructure is integrated with the subdivision of land	Accept

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S32.041	One New Zealand Group Limited	SUB - Subdivision	SUB-O3	Support	Retain SUB-O3 as notified	SUB-O3 clearly sets out that infrastructure is integrated with the subdivision of land	Accept
S33.041	FortySouth	SUB - Subdivision	SUB-O3	Support	Retain SUB-O3 as notified	SUB-O3 clearly sets out that infrastructure is integrated with the subdivision of land	Accept
S37.041	Connexa Limited	SUB - Subdivision	SUB-O3	Support	Retain SUB-O3 as notified	SUB-O3 clearly sets out that infrastructure is integrated with the subdivision of land	Accept
S112.076	Waka Kotahi NZ Transport Agency	SUB - Subdivision	SUB-O3	Support in part	Amend SUB - O3 to include wording this effect: Infrastructure required to serve the subdivision of land is provided in an integrated, efficient and coordinated manner and is accommodated within existing infrastructure networks including any upgrades required. Or insert a new objective with wording to this affect.	Waka Kotahi partly supports this objective in that it seeks to provide infrastructure required as part of subdivision in an integrated, efficient and coordinated manner. However, we do seek an amendment to ensure that existing infrastructure has sufficient capacity to serve the subdivision including any upgrades that are required. Alternatively, insert a new objective with wording to this affect. This relief is sought to provide support to Policy SUB - P7.	Reject
FS5.71	Hamish Weir			Oppose	Disallow	The change proposed is unnecessary as the current wording is already satisfactory.	Accept
S35.041	Chorus New Zealand Limited	SUB - Subdivision	SUB-O3	Support	Retain SUB-O3 as notified	SUB-O3 clearly sets out that infrastructure is integrated with the subdivision of land	Accept
FS21.079	Yrless Limited			Support	Allow	Recognizes the importance of infrastructure to communities.	Accept
S101.063	Transpower New	SUB - Subdivision	SUB-O4	Oppose	Amend Objective SUB-O4 as follows: SUB-O4 Subdivisions are designed and developed in a way that: 1. protects	Transpower does not support Objective SUB-O4 as currently drafted on the basis that the Objective fails to recognise the potential impact of	Accept

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	Zealand Limited				significant physical , natural, ecological, historical and cultural features, values and resources, 2. (...)	subdivision on the National Grid in a manner that gives effect to Policies 10 and 11 of the NPSET. Transpower seeks limited amended to address this by inserting reference to subdivision design protecting of physical resources, as well as natural resources.	
S109.093	Department of Conservation	SUB - Subdivision	SUB-O4	Support	Retain as notified	The D-G supports this objective.	Accept in part
S125.032	Ministry of Education	SUB - Subdivision	SUB-O4	Support in part	None specified.	The submitter supports SUB-O4 in principle as it generally seeks to provide for appropriately designed subdivisions, giving regard to the physical environment.	Accept
S125.033	Ministry of Education	SUB - Subdivision	SUB-O4	Support in part	Amend as follows: Subdivisions are designed and developed in a way that: 1. protects significant natural, ecological, historical and cultural features, values and resources, 2. recognises and provides for the underlying relationships between Ngāi Tahu and the natural environment; and 3. responds to the physical characteristics and constraints of the site and surrounding environment, and 4. provides for sufficient infrastructure, including social infrastructure, to serve the additional development.	Given there is an associated policy (SUB-P7), the submitter considers it appropriate for the overarching policy to addresses infrastructure, including social infrastructure as this is an integral part of subdivision development, if deemed necessary by a needs assessment, to ensure population growth and the impact on schools is considered.	Reject

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S139.061	Hokonui Rūnanga Inc	SUB - Subdivision	SUB-O4	Support in part	Amend to read: "Subdivisions are designed and developed in a way that: ... ~~2. recognises and provides for the underlying relationships between Ngāi Tahu and the natural environment~~ works with the natural contours of the land and drainage patterns, maintains or enhances wetlands, indigenous vegetation and other taonga on-site, maintains or enhances mahinga kai values, and protects wāhi tapu from inappropriate access or disturbance; and	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Accept in part
FS5.72	Hamish Weir			Oppose	Disallow	The current wording is sufficient	Reject
S126.115	Southland Federated Farmers of New Zealand	SUB - Subdivision	SUB-O4	Oppose in part	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.	The Council must state a commitment to recognize and protect highly productive land.	Reject
FS5.73	Hamish Weir			Oppose	Disallow	The use of the phrase 'highly productive land' is currently the subject of considerable controversy and debate. It is highly likely that the new Government will provide further direction on this matter and it would be inappropriate to include this within the Plan before this is confirmed.	Accept
S115.116	Kevin Robertson	SUB - Subdivision	SUB-O4	Oppose in part	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.	The Council must state a commitment to recognize and protect highly productive land.	Reject

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FS5.74	Hamish Weir			Oppose	Disallow	This matter is already covered by the NPS-HPL which is likely to be subject to change in the near future. It is not appropriate to include reference to this before direction is provided from Government.	Accept
S60.118	Ronald Crispin	SUB - Subdivision	SUB-O4	Oppose in part	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.	The Council must state a commitment to recognize and protect highly productive land.	Reject
FS5.75	Hamish Weir			Oppose	Disallow	This matter is already covered by the NPS-HPL which is likely to be subject to change in the near future. It is not appropriate to include reference to this before direction is provided from Government.	Accept
S143.127	Rural Ratepayers Group	SUB - Subdivision	SUB-O4	Oppose in part	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.	The Council must state a commitment to recognize and protect highly productive land.	Reject
FS5.76	Hamish Weir			Oppose	Disallow	This matter is already covered by the NPS-HPL which is likely to be subject to change in the near future. It is not appropriate to include reference to this before direction is provided from Government.	Accept
S148.128	Alistair & Bernadette Hunt	SUB - Subdivision	SUB-O4	Oppose in part	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.	The Council must state a commitment to recognize and protect highly productive land.	Reject
FS5.77	Hamish Weir			Oppose	Disallow	This matter is already covered by the NPS-HPL which is likely to be subject to change in the near future. It is not appropriate to include reference to this before direction is provided from Government.	Accept
S68.236	John Baynes	SUB - Subdivision	SUB-O4	Oppose in part	Amend SUB-O4 to include: 4. recognises and protects areas of highly productive land.	The Council must state a commitment to recognize and protect highly productive land.	Reject

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FS5.78	Hamish Weir			Oppose	Disallow	This matter is already covered by the NPS-HPL which is likely to be subject to change in the near future. It is not appropriate to include reference to this before direction is provided from Government.	Accept
S126.116	Southland Federated Farmers of New Zealand	SUB - Subdivision	SUB-05	Support in part	Amend SUB-05: 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~~	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.	Accept
S115.117	Kevin Robertson	SUB - Subdivision	SUB-05	Support in part	Amend SUB-05: 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~~	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.	Accept
S143.128	Rural Ratepayer s Group	SUB - Subdivision	SUB-05	Support in part	Amend SUB-05: 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~~	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.	Accept
S148.129	Alistair & Bernadette Hunt	SUB - Subdivision	SUB-05	Support in part	Amend SUB-05: Esplanade reserves and strips are created through subdivision for the purposes stated in section 229 of the	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	Accept

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					~~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~~	our view that public access requires landowner consent therefore the provision of public access in this objective should be removed.	
S60.119	Ronald Crispin	SUB - Subdivision	SUB-05	Support in part	Amend SUB-05: 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~~	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.	Accept
S68.237	John Baynes	SUB - Subdivision	SUB-05	Support in part	Amend SUB-05: 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~~	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.	Accept
S110.038	Royal Forest and Bird Society of NZ Inc	SUB - Subdivision	SUB-05	Amend	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.	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	Accept
FS5.79	Hamish Weir			Oppose	Disallow	Sufficient esplanade strip provisions are already provided.	Reject

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S85.102	Environment Southland	SUB - Subdivision	SUB-O5	Oppose in part	Establish a new policy which takes a precautionary approach to subdivisions in areas prone to natural hazard risk.	The Subdivision section needs to link to the natural hazard chapter. Subdivision is also a precursor to further land development so a cautious approach will prevent risky development in unsuitable areas.	Reject
FS5.80	Hamish Weir			Oppose	Disallow	Current consultation requirements are already sufficient for mitigation of natural hazards and no further consideration is necessary.	Accept
FS22.003	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - unnecessary as natural hazard assessment is already required without creating extra redundant policy.	Accept
S124.025	Fire and Emergency NZ	SUB - Subdivision	SUB-P2	Support	Retain as notified	Fire and Emergency supports SUB-P2 as proposed as it seeks necessary access and infrastructure to be available.	Accept
S154.042	Spark New Zealand Trading Limited	SUB - Subdivision	SUB-P2	Support	Retain SUB-P2 as notified	Requiring provisions for infrastructure in new allotments is supported	Accept
S32.042	One New Zealand Group Limited	SUB - Subdivision	SUB-P2	Support	Retain SUB-P2 as notified	Requiring provisions for infrastructure in new allotments is supported	Accept
S33.042	FortySouth	SUB - Subdivision	SUB-P2	Support	Retain SUB-P2 as notified	Requiring provisions for infrastructure in new allotments is supported	Accept
S37.042	Connexa Limited	SUB - Subdivision	SUB-P2	Support	Retain SUB-P2 as notified	Requiring provisions for infrastructure in new allotments is supported	Accept

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S35.042	Chorus New Zealand Limited	SUB - Subdivision	SUB-P2	Support	Retain SUB-P2 as notified	Requiring provisions for infrastructure in new allotments is supported	Accept
FS21.080	Yrless Limited			Support	Allow	Recognises the importance of infrastructure to communities.	Accept
S132.058	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-P21	Support	Retain SUB-P21 as proposed.	Supports discouraging non-compliance with minimum lot sizing to ensure habitable buildings are not too close to the rail corridor which has the potential to cause reverse sensitivity effects.	Accept
S101.064	Transpower New Zealand Limited	SUB - Subdivision	SUB-P3	Oppose	Amend Policy SUB-P3 as follows: "SUB-P3 Ensure subdivisions are designed to avoid and manage effects from site constraints, including but not limited to topography, the national grid, and significant natural areas." And as a consequent, " SUB-PX. Avoid subdivision in the National Grid subdivision corridor where future activities may result in adverse effects on the National Grid, including reverse sensitivity effects, that would compromise the operation, maintenance, upgrading and development of the National Grid. "	Transpower opposes the subdivision policies to the extent that the policies fail to appropriately address the potential impacts of subdivision on the National Grid in a manner that gives effect to the NPSET (and particularly Policies 10 and 11). The management of subdivision in the vicinity of the National Grid is crucial to ensuring the ongoing operation, maintenance and upgrading of the National Grid. This is achieved by subdivision layouts that maintain the integrity of the National Grid Yard and secure Transpower's access to the National Grid. Transpower is of the view that Policy SUB-P3 does not clearly achieve the outcomes directed by the NPSET. Transpower notes that the Proposed District Plan includes a separate policy (SUB-P5) in relation to subdivision near state highways and Transpower seeks the inclusion of a similar provision in respect of the National Grid.	Reject
FS5.81	Hamish Weir			Oppose in part	Disallow in part	The word 'avoid' should be removed as this could trigger unnecessary & disproportionate costs for large scale rural subdivisions.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS28.035	Kainga Ora			Oppose	Disallow	Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid Subdivision corridor provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.	Accept
S100.001	Charlton Rise Limited	SUB - Subdivision	SUB-P3	Support in part	Remove "avoid" from policy. Or use "or" as per SUB-P5.	Removing the word avoid which will allow subdivisions to occur where constraints are managed, rather than preventing them.	Accept in part
FS5.82	Hamish Weir			Support	Allow		Accept in part
FS28.036	Kainga Ora			Support	Allow	Kāinga Ora considers that the SUB-P3 should be amended as per S100.001 as follows: Ensure subdivisions are designed to avoid or manage effects from site constraints, including but not limited to topography, the national grid, and significant natural areas.	Accept in part
S85.103	Environment Southland	SUB - Subdivision	SUB-P4	Oppose	Include " medium, high and " in front of significant natural hazards	Recognise that natural hazard mapping is not entirely accurate and a precautionary approach to development should be taken. Enabling development in natural hazard areas with minimum floor levels will unnecessarily expose communities to a medium and high level of risk during a flood event.	Reject Defer to HS9
S35.043	Chorus New Zealand Limited	SUB - Subdivision	SUB-P5	Support in part	Amend SUB-P5 as follows Ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land use are avoided, remedied or mitigated	Reverse sensitivity effects should be avoided, remedied or mitigated on all critical infrastructure to provide consistency.	Accept in part

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					or managed, including from adjacent land uses, railway lines and States Highways.		
FS28.039	Kainga Ora			Oppose	Disallow	Kāinga Ora is concerned that the changes proposed change the intent of what the policy is intended to manage. In addition, reverse sensitivity in itself is not an adverse effect.	Reject
FS29.041	Silver Fern Farms Limited			Oppose in part	Disallow in part	Silver Ferns Farms does not oppose intent, but the proposed wording suggests that critical infrastructure is the main part (or primary subject) of the policy. If this submission is accepted, it would be more appropriate to say "... on adjacent land uses, including critical infrastructure..."	Accept
FS21.081	Yrless Limited			Support	Allow	Recognises the importance of infrastructure to communities. Amend SUB-PS to ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land use are avoided, remedied or mitigated or managed.	Accept in part
S40.040	Silver Fern Farms	SUB - Subdivision	SUB-P5	Oppose	Amend as follows: Ensure reverse sensitivity effects from subdivision are avoided or managed, including ~~from~~ on adjacent land uses, railway lines, and States Highways.	This policy appears to slightly misapply the concept of "reverse sensitivity" in referring to effects "...from adjacent land uses, railway lines and States [sic] Highways". Reverse sensitivity effects are effects "on" - not "from" - existing activities. This is described by the definition of "reverse sensitivity" in the Proposed Plan and as per the drafting of rules in this chapter, like SUB-R5(14).	Accept
FS28.040	Kainga Ora			Support in part	Allow in part	Kāinga Ora agrees that the notified provision is unclear on what effects are being managed. Kāinga considers that the policy should be drafted to be clear on what effects are being managed, and what activities are being affected.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S121.059	Alliance Group Limited	SUB - Subdivision	SUB-P5	Amend	Amend as follows: Ensure reverse sensitivity effects from subdivision are avoided or managed, including ~~from~~ on adjacent land uses, railway lines, and States Highways.	This policy appears to slightly misapply the concept of "reverse sensitivity" in referring to effects "...from adjacent land uses, railway lines and States [sic] Highways". Reverse sensitivity effects are effects "on" - not "from" - existing activities. This is described by the definition of "reverse sensitivity" in the Proposed Plan and as per the drafting of rules in this chapter, like SUB-R5(14)	Accept
FS28.041	Kainga Ora			Support in part	Allow in part	Kāinga Ora agrees that the notified provision is unclear on what effects are being managed. Kāinga considers that the policy should be drafted to be clear on what effects are being managed, and what activities are being affected.	Accept in part
S132.056	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-P5	Amend	Amend as follows: Ensure reverse sensitivity effects from subdivision are avoided or managed, including from adjacent land uses, to protect the function and operation of railway lines and States Highways.	Supports the intention for reverse sensitivity effects from subdivision to be avoided.	Reject
FS28.042	Kainga Ora			Oppose	Disallow	Kāinga Ora agrees with submitters S40.040 and S121.059 that the notified provision is unclear on what effects are being managed. Kāinga Ora considers that the policy should be drafted to be clear on what effects are being managed, and what activities are being affected. Until this is clarified, this submission point should be rejected. In addition, the policy should be amended to include the word 'unacceptable' as follows: Ensure unacceptable reverse sensitivity effects from subdivision are avoided or managed, including on	Accept

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						adjacent land uses, railway lines and States Highways.	
S33.043	FortySouth	SUB - Subdivision	SUB-P5	Support in part	Amend SUB-P5 as follows Ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land use are avoided, remedied or mitigated or managed, ~~including from adjacent land uses, railway lines and States Highways.~~	Reverse sensitivity effects should be avoided, remedied or mitigated on all critical infrastructure to provide consistency.	Accept in part
FS28.043	Kainga Ora			Oppose	Disallow	Kāinga Ora agrees with submitters S40.040 and S121.059 that the notified provision is unclear on what effects are being managed. Kāinga considers that the policy should be drafted to be clear on what effects are being managed, and what activities are being affected. Until this is clarified, this submission point should be rejected.	Reject
FS29.043	Silver Fern Farms Limited			Oppose in part	Disallow in part	Silver Ferns Farms does not oppose intent, but the proposed wording suggests that critical infrastructure is the main part (or primary subject) of the policy. If this submission is accepted, it would be more appropriate to say "... on adjacent land uses, including critical infrastructure..."	Accept
S37.043	Connexa Limited	SUB - Subdivision	SUB-P5	Support in part	Amend SUB-P5 as follows Ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land use are avoided, remedied or mitigated or managed, ~~including from adjacent land uses, railway lines and States Highways.~~	Reverse sensitivity effects should be avoided, remedied or mitigated on all critical infrastructure to provide consistency.	Accept in part
FS28.044	Kainga Ora			Oppose	Disallow	Kāinga Ora agrees with submitters S40.040 and S121.059 that the notified provision is unclear on what effects are being managed. Kāinga considers that the policy should be drafted to be clear on	Reject

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						what effects are being managed, and what activities are being affected. Until this is clarified, this submission point should be rejected.	
FS29.044	Silver Fern Farms Limited			Oppose in part	Disallow in part	Silver Ferns Farms does not oppose intent, but the proposed wording suggests that critical infrastructure is the main part (or primary subject) of the policy. If this submission is accepted, it would be more appropriate to say "... on adjacent land uses, including critical infrastructure..."	Accept
S154.043	Spark New Zealand Trading Limited	SUB - Subdivision	SUB-P5	Support in part	Amend SUB-P5 as follows Ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land use are avoided, remedied or mitigated or managed, ~~including from adjacent land uses, railway lines and State Highways.~~	Reverse sensitivity effects should be avoided, remedied or mitigated on all critical infrastructure to provide consistency.	Accept in part
FS28.045	Kainga Ora			Oppose	Disallow	Kāinga Ora agrees with submitters S40.040 and S121.059 that the notified provision is unclear on what effects are being managed. Kāinga considers that the policy should be drafted to be clear on what effects are being managed, and what activities are being affected. Until this is clarified, this submission point should be rejected.	Reject
FS29.045	Silver Fern Farms Limited			Oppose in part	Disallow in part	Silver Ferns Farms does not oppose intent, but the proposed wording suggests that critical infrastructure is the main part (or primary subject) of the policy. If this submission is accepted, it would be more appropriate to say "... on adjacent land uses, including critical infrastructure..."	Accept
S32.043	One New Zealand	SUB - Subdivision	SUB-P5	Support in part	Amend SUB-P5 as follows Ensure reverse sensitivity effects from subdivision on adjacent critical infrastructure and land	Reverse sensitivity effects should be avoided, remedied or mitigated on all critical infrastructure to provide consistency.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	Group Limited				~~use are avoided, remedied or mitigated or managed, including from adjacent land uses, railway lines and State Highways.~~		
FS29.042	Silver Fern Farms Limited			Oppose in part	Disallow in part	Silver Ferns Farms does not oppose intent, but the proposed wording suggests that critical infrastructure is the main part (or primary subject) of the policy. If this submission is accepted, it would be more appropriate to say "... on adjacent land uses, including critical infrastructure..."	Accept
S112.078	Waka Kotahi NZ Transport Agency	SUB - Subdivision	SUB-P7	Support in part	Amend as follows: Ensure subdivision is appropriately serviced and integrated with existing or planned infrastructure that is provided in a safe, efficient, integrated and coordinated manner by: ... 9. Encouraging subdivision layout and orientation which supports energy efficiency including active travel (walking and cycling) and conservation for future land uses. 10. Ensuring subdivision design that includes a stormwater system avoids any adverse effects on the safe, efficient and effective operation and function of land transport infrastructure.	Waka Kotahi supports this policy as it recognises the need to ensure that infrastructure networks have the capacity to accommodate the additional demand and require upgrades be completed at the time of subdivision (point 1) and ensuring legal and physical access to each lot is provided at the time of subdivision (point 4). Waka Kotahi recommends that the wording 'safe' be inserted within this policy. In addition, we recommend that point 9 be amended to insert the wording 'support active travel modes'. Waka Kotahi seeks that a new point 10. be inserted into the policy that recognises that directing stormwater from subdivision into the State highway stormwater system can overwhelm the existing systems creating flooding issues along the State highway.	Accept in part
S125.034	Ministry of Education	SUB - Subdivision	SUB-P7	Support in part	None specified.	The submitter supports SUB-P7, as it ensures subdivision provide the required infrastructure.	Accept
S125.035	Ministry of Education	SUB - Subdivision	SUB-P7	Support in part	Amend as follows: Ensure subdivision is appropriately serviced and integrated with existing or	It is important that subdivisions are designed to accommodate social infrastructure, if deemed necessary by a needs assessment, to ensure	Accept in part

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					planned infrastructure that is provided in an efficient, integrated and co-ordinated manner by: 1. Ensuring infrastructure networks, including social infrastructure , have sufficient capacity to accommodate the additional development, and requiring any necessary upgrades to be completed at the time of subdivision; (...)	population growth and the impact on schools is considered.	
S124.026	Fire and Emergency NZ	SUB - Subdivision	SUB-P7	Support	Retain as notified	Fire and Emergency supports SUB-P7 insofar as it required subdivisions to be appropriately serviced and for infrastructure to be installed at the time of subdivision. Further, Fire and Emergency support the requirement for connections to reticulated systems to be provided where practicable. Fire and Emergency support the policy as it requires the provision of water supply infrastructure with sufficient capacity for firefighting purposes.	Accept in part
S132.057	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-P7	Amend	Amend SUB-P7 as follows: Ensure subdivision is appropriately serviced and integrated with existing or planned infrastructure that is provided in ~~an~~ a safe, efficient, integrated and co-ordinated manner by: 10. Ensure that subdivision designs provide for the treatment and safe disposal of stormwater that does not result in increased flooding and erosion risk.	Supports recognizing the need to ensure subdivision is appropriately serviced and integrated with existing or planned infrastructure by ensuring infrastructure networks have sufficient capacity to accommodate the additional development, and requiring upgrades to be completed at the time of subdivision. Seeks an amendment to ensure that the rail network is adequately protected from inappropriate stormwater management through subdivision.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S154.044	Spark New Zealand Trading Limited	SUB - Subdivision	SUB-P7	Support	Retain SUB-P7 as notified	SUB-P7.1 essentially requires consultation with infrastructure providers so that they can explain capacity matters to the applicant.	Accept in part
S32.044	One New Zealand Group Limited	SUB - Subdivision	SUB-P7	Support	Retain SUB-P7 as notified	SUB-P7.1 essentially requires consultation with infrastructure providers so that they can explain capacity matters to the applicant.	Accept in part
S33.044	FortySout h	SUB - Subdivision	SUB-P7	Support	Retain SUB-P7 as notified	SUB-P7.1 essentially requires consultation with infrastructure providers so that they can explain capacity matters to the applicant.	Accept in part
S37.044	Connexa Limited	SUB - Subdivision	SUB-P7	Support	Retain SUB-P7 as notified	SUB-P7.1 essentially requires consultation with infrastructure providers so that they can explain capacity matters to the applicant.	Accept in part
S50.001	Jacklyn (Jackie) Johnston	SUB - Subdivision	SUB-P7	Support	Propose a mandatory inclusion of rainwater capture and greywater recycling in all new builds and alterations where it is practical, for example new roofing. With the possibility of subsidies. The Council could explore potential bulk contracts for tanks at reduced costs given the significant numbers.	We should utilise our natural resources, especially in times of water shortage. Water meters are an option but introduce ongoing costs without addressing the shortage issue during certain times of the year. Making rainwater capture and greywater recycling a requirement in the consent process for new builds initiates a positive change. This is implemented in other places facing water scarcity, fostering a mindset of responsible water usage when individuals are collecting their own water.	Reject
FS5.84	Hamish Weir			Oppose	Disallow	Subdivision & Development Bylaw covers these matters and it is unnecessary to include in the Plan.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS22.006	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - rainwater capture is already required by the Subdivision and Land Development Bylaw 2019 and does not need to be replicated in the district plan. This is an engineering matter not a planning matter and therefore does not need to be included in the district plan.	Accept
S35.044	Chorus New Zealand Limited	SUB - Subdivision	SUB-P7	Support	Retain SUB-P7 as notified	SUB-P7.1 essentially requires consultation with infrastructure providers so that they can explain capacity matters to the applicant.	Accept in part
FS28.046	Kainga Ora			Oppose	Disallow	Kāinga Ora agrees with submitters S40.040 and S121.059 that the notified provision is unclear on what effects are being managed. Kāinga considers that the policy should be drafted to be clear on what effects are being managed, and what activities are being affected. Until this is clarified, this submission point should be rejected.	Reject
S115.118	Kevin Robertson	SUB - Subdivision	SUB-P8	Support	Retain SUP-P8 as drafted.	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Accept
S143.129	Rural Ratepayers Group	SUB - Subdivision	SUB-P8	Support	Retain SUP-P8 as drafted.	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Accept
S148.130	Alistair & Bernadette Hunt	SUB - Subdivision	SUB-P8	Support	Retain SUP-P8 as drafted.	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S60.120	Ronald Crispin	SUB - Subdivision	SUB-P8	Support	Retain SUP-P8 as drafted.	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Accept
S68.238	John Baynes	SUB - Subdivision	SUB-P8	Support	Retain SUP-P8 as drafted.	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Accept
S126.117	Southland Federated Farmers of New Zealand	SUB - Subdivision	SUB-P8	Support	Retain SUP-P8 as drafted.	Boundary adjustments do not always require services and subdivision is not always undertaken to create land use change or provide building opportunities.	Accept
FS22.007	Clark Fortune McDonald & Associates			Support	Allow	Support - we agree boundary adjustments often do not require services and are often undertaken for land management reasons not for the purpose of enabling development	Accept
S85.104	Environment Southland	SUB - Subdivision	SUB-P10	Support in part	Expand to consider secondary stormwater flow paths during subdivision design	Secondary flow paths can flood subdivisions if not adequately managed.	Reject
FS5.85	Hamish Weir			Oppose	Disallow	This matter is covered by the Subdivision & Development Bylaw and does not need to be addressed in the plan	Accept
FS22.008	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - already required by the Subdivision and Land Development Bylaw 2019 and does not need to be replicated by redundant policy in the district plan.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S85.105	Environment Southland	SUB - Subdivision	SUB-P11	Support in part	Support there being a rule relating to SNA and ONL. The activity should be uplifted to non-complying and include boundary adjustment	Subdivision is a precursor to further development. Subdivision can fragment ecological areas and landscapes. New subdivision boundaries should go around high value locations in the district not through.	Reject
FS5.86	Hamish Weir			Oppose	Disallow in part	Rules allowing subdivision and boundary adjustments on parcels that contain ONLs & SNAs should be discretionary at most as long as new boundaries do not bisect the features.	Accept
FS22.009	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - submission is completely impractical and incorrectly assumes that all subdivision is a precursor to further development. Many subdivisions, particularly in rural areas are not related to any development or change of land use but are for other reasons such as land management, sale & purchase, succession planning etc.	Accept
S126.118	Southland Federated Farmers of New Zealand	SUB - Subdivision	SUB-P13	Support in part	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.	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.	Accept
S50.002	Jacklyn (Jackie) Johnston	SUB - Subdivision	SUB-P13	Support in part	Reconsider this provision as it is in conflict with SUB-S1 (h).	Productive rural land and high-value soils should be preserved.	Accept in part
S115.119	Kevin Robertson	SUB - Subdivision	SUB-P13	Support in part	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.	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.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S143.130	Rural Ratepayer's Group	SUB - Subdivision	SUB-P13	Support in part	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.	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.	Accept
S148.131	Alistair & Bernadette Hunt	SUB - Subdivision	SUB-P13	Support in part	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.	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.	Accept
S60.121	Ronald Crispin	SUB - Subdivision	SUB-P13	Support in part	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.	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.	Accept
S68.239	John Baynes	SUB - Subdivision	SUB-P13	Support in part	Amend SUB-P13: Subdivision and development in the General Rural zone preserves and protects the productive capability of rural land and high value soils.	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.	Accept
S100.003	Charlton Rise Limited	SUB - Subdivision	SUB-P15	Support in part	Remove 'multiple vacant allotments' from policy	Support provision that avoids creation of undersized bare allotments but vacant allotments may be created that are of typical residential area (ie 400m2+) and the use of avoid in the policy would prevent the subdivision to create bare lots in that circumstance.	Accept
FS28.047	Kainga Ora			Support	Allow	Kāinga Ora agrees that the policy is confusing, and the intent is not understood, Kāinga Ora does not consider that multiple vacant allotments is an	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						adverse effect and allows for super lot subdivisions.	
FS22.010	Clark Fortune McDonald & Associates			Support	Allow	Support - provision to avoid multiple vacant allotments may create unfair situation where it is much easier for commercial developers to subdivide land than private landowners who wish to sell bare land for others to build on.	Accept
S109.094	Department of Conservation	SUB - Subdivision	SUB-P18	Support	Retain as notified	The D-G supports this policy.	Accept in part
S110.039	Royal Forest and Bird Society of NZ Inc	SUB - Subdivision	SUB-P18	Amend	Add/change: Protect and enhance landscapes, vegetation, ecological connections and indigenous biodiversity ~~that are of a sufficient value that they should be retained.~~	There is no definition or explanation of what test landscapes, vegetation or indigenous biodiversity will need to go through to deem if 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.	Accept in part
FS5.87	Hamish Weir			Oppose	Disallow	Unnecessary addition as is covered by ECO rules	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS22.011	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - it is simply not practical or feasible to protect and enhance ALL landscapes, vegetation, ecological connections and indigenous biodiversity.	Accept in part
S121.060	Alliance Group Limited	SUB - Subdivision	SUB-P19	Support	Retain as notified	The proposed introduction of the RLZ in the area north/west of the western site at Alliance may facilitate lifestyle subdivision in the future. It is therefore appropriate that SUB-P19 be retained as notified to require consideration of reverse sensitivity effects at the time of subdivision.	Accept
S40.041	Silver Fern Farms	SUB - Subdivision	SUB-P19	Support	Retain as notified	The proposed introduction of the RLZ in the area north/west of the Silver Fern Farms' site may facilitate lifestyle subdivision in the future. It is therefore appropriate that SUB-P19 be retained as notified to require consideration of reverse sensitivity effects at the time of subdivision.	Accept
S124.027	Fire and Emergency NZ	SUB - Subdivision	SUB-R1	Support in part	Amend as follows: Matters of Control 2. The provision, ~~design and construction of infrastructure and services; and for servicing, including water supply, firefighting water supply in accordance with SNZ PAS 4509:2008, wastewater treatment and disposal, stormwater design and disposal, electricity and telecommunications.~~	Fire and Emergency support the SUB-R1 for Boundary Adjustments insofar that the matter of control pertains to infrastructure and services. Fire and Emergency seek for consistency that the provision for services outlined in the matters of control specifically includes firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice - SNZ PAS 4508:2008.	Reject
FS5.89	Hamish Weir			Oppose	Disallow	Specific standards are likely to change before the District Plan is next renewed so should not be included. The notified working already provides for the assessment of infrastructure and should be retained without modification.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S3.030	Stoney Creek Station Limited	SUB - Subdivision	SUB-R1	Oppose	Delete Condition 6 ('The site does not contain a Significant Natural Area or Outstanding Natural Landscape or Feature') from SUB-R1.	Stoney Creek questions why sites containing SNAs or ONLs are not afforded controlled activity status when the environmental effects of these activities are negligible.	Reject
FS5.90	Hamish Weir			Support	Allow		Reject
FS17.055	Federated Farmers			Support	Allow	Federated Farmers supports the deletion of clause 6 as there is limited rationale to not offer controlled activity status to sites containing SNAs or ONLs.	Reject
FS22.014	Clark Fortune McDonald & Associates			Support	Allow	Support. There is no reason to restrict boundary adjustments from controlled activity status just because there is an SNA or ONL within the same large site, if the SNA or ONL is not adversely affected by the boundary adjustment.	Reject
S132.059	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-R1	Amend	Amend as follows: Matters of Control: ... 5. Management of potential reverse sensitivity effects on existing land users, including critical infrastructure, network utilities or hazardous facilities.	KiwiRail are concerned with potential reverse sensitivity effects from boundary adjustment on the rail network.	Accept
FS5.91	Hamish Weir			Oppose	Disallow	Boundary adjustments are often necessary to reflect discrepancies between the Cadastral Record and occupation of land. The existing environment often does not change and there is simply an alignment of the 'paper records' with the physical situation on the ground. It would be inappropriate to put this additional burden of assessment on these activities.	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S100.036	Charlton Rise Limited	SUB - Subdivision	SUB-R1	Support in part	Replace 'lots' with 'titles' or 'Records of Title' in 1.-9. Remove point 9 restricting boundary adjustments in Development Areas	The replacement of 'lots' with 'Records of Title' will remove any ambiguity on the way boundary adjustment subdivision can be undertaking.	Reject
FS5.92	Hamish Weir			Oppose	Disallow	SUB-R4 has been included to deal with this as National Planning Standards definition of Boundary adjustment does not refer to Records of Title. This change is unnecessary.	Accept
FS22.015	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - agree with intention, but understand the reference to lots instead of titles may be forced by compliance with national planning standards definitions etc.	Accept
S55.003	Brent Herbert	SUB - Subdivision	SUB-R1	Oppose	SUB-R1(7) The site does not contain a wastewater treatment facility or water supply treatment facility buffer area;	Matt Bayliss advised reason for buffer zones was to advise potential buyers of nearby water treatment plants. Note to property file would meet requirement without controls preventing subdivision. Negative health and financial impacts on current owners who would seek financial compensation from Council.	Accept
FS22.012	Clark Fortune McDonald & Associates			Support	Allow	Support - proposed water supply treatment facility buffer area would impose unreasonable restriction on the use of residential zoned land, including numerous existing dwellings.	Accept
S74.015	Hamish Weir	SUB - Subdivision	SUB-R2	Support	Retain this rule.	The submitter supports this rule, noting the conversion of tenure is usually used to resolve	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						existing conflicts or to improve ownership rights generating positive effects.	
S132.060	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-R2	Support	Retain SUB-R2 as proposed.	Supports the conversion of unit title or cross lease to freehold and the matters of control in particular the Matters of Control that provide for the provision of design and construction of infrastructure and services and the provision to include any necessary consent notices.	Accept
FS12.002	Fuel Companies			Support	Allow	The Fuel Companies are generally supportive of S132.060 and S132.062 seeking an additional matter of control to manage reverse sensitivity effects. Seek that these changes be accepted.	Accept
S132.061	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-R3	Support	Retain SUB-R3 as proposed.	Supports alteration of a cross lease plan and the matters- of control that provide for design and construction and infrastructure and services and the provision to include any necessary consent notices.	Accept
S74.016	Hamish Weir	SUB - Subdivision	SUB-R3	Support in part	Retain this rule, with a minor alteration to matter of control 3; 3. The requirement for any easements to legalise access and services and any necessary consent notices.	Cross leases plans and Land Transfer plans differ in format. Easements are not created on cross lease plans and services are managed through the lease document which specifies maintenance rights when services pass under, through or over adjacent lease areas. The idea being that the owners undivided equal share of the underlying allotment means there is no need to delineate an LT easement area for services. Access is covered by covenant areas on the cross-lease plan which are often in common ownership. Easements cannot be created on a cross lease plans and should not be required as this would require a separate LT plan	Reject

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						not connected to the cross lease and potentially in conflict with.	
FS22.016	Clark Fortune McDonald & Associates			Support	Allow	Support. We agree with the submitters points in relation to cross-leases.	Reject
S132.062	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-R4	Amend	Amend SUB-R4 as follows: Matters of Control: ... 5. Management of potential reverse sensitivity effects on existing land users, including critical infrastructure, network utilities or hazardous facilities.	KiwiRail generally support this rule but are concerned with potential reverse sensitivity effects on the rail network from smaller lots where the zones do not have a minimum lot size on the rail network, therefore we seek an inclusion in the Matters of Control.	Accept
FS12.003	Fuel Companies			Support	Allow	The Fuel Companies are generally supportive of S132.060 and S132.062 seeking an additional matter of control to manage reverse sensitivity effects. Seek that these changes be accepted.	Accept
S112.079	Waka Kotahi NZ Transport Agency	SUB - Subdivision	SUB-R4	Support in part	Amend as follows: Subdivision resulting in no additional lots created: Activity Status: Controlled Where: 10. The site does not include a proposed vehicular access to a State highway (existing or new access).	Waka Kotahi generally supports the rule that requires subdivision resulting in no additional lots is a Controlled activity and supports all the stated Matters of control. Waka Kotahi notes that there are provisions for specific situations such as if a site contains historic heritage item, archaeological site listed in a Historic Heritage Schedule SUB - R8 or if a site contains a notable tree SUB - R9 is a Restricted Discretionary Activity. An additional standard is requested that any subdivision resulting in no additional lots created that has a proposed vehicular access to a State highway (be it an existing or new access) is not a controlled but a restricted discretionary activity.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS5.94	Hamish Weir			Oppose	Disallow	The activity should still retain the ability to achieve Controlled status but potentially an Control on consultation with NZTA re access standards would be acceptable.	Reject
S146.055	Southland District Council	SUB - Subdivision	SUB-R4	Oppose	Clarify what this rule is trying to accomplish	The submitter is unsure what the provision will accomplish and what subdivisions will qualify for this provision. Similar phrasing has been used in the SDC DP and concerns have been raised around the interpretation and implementation. Suggests if the phrasing is kept a clarification note or non-exclusive list of qualifying activities be included.	Reject
FS5.95	Hamish Weir			Oppose	Disallow		Accept
S99.006	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-R4	Not Stated	Rule 4 is re-worded from ~~'the site does not contain ...'~~ , to read 'the boundary adjustment does not have an adverse effect in relation to ...'	Unilaterally exclude a boundary adjustment from having a controlled activity status even if any boundary adjustment does not have an effect on those features.	Reject
FS5.97	Hamish Weir			Support	Allow		Reject
FS11.014	Heritage New Zealand Pouhere Taonga			Oppose	Disallow	The setting of a historic heritage place may contribute significantly to its overall heritage value. The proposed amendment would allow for boundary adjustments to places on the HH-SCHED1 as a controlled activity. An application for a controlled activity cannot be declined (except if s106 of the RMA applies). Determining whether a boundary adjustment does or does not have an adverse effect on historic heritage requires further assessment and consultation with HNZPT is	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						anticipated. If an activity is a controlled activity, resource consent applications may be notified, although it is common for them to be non-notified. This amendment would not provide for s6(f) of the RMA nor HH-O3 of the proposed District Plan.	
S55.004	Brent Herbert	SUB - Subdivision	SUB-R4	Oppose	Sub-R4(7) The site does not contain a wastewater treatment facility ~~or water supply treatment facility~~ buffer area;	Matt Bayliss advised reason for buffer zones was to advise potential buyers of nearby water treatment plants. Note to property file would meet requirement without controls preventing subdivision. Negative health and financial impacts on current owners who would seek financial compensation from Council.	Accept
FS22.017	Clark Fortune McDonald & Associates			Support	Allow	Support - proposed water supply treatment facility buffer area would impose unreasonable restriction on the use of residential zoned land, including numerous existing dwellings.	Accept
S74.017	Hamish Weir	SUB - Subdivision	SUB-R4	Support in part	1. The title of the rule should be rewritten as follows; Subdivision resulting in no additional ~~lots~~ records of title created 2. The wording of SUB-R4 - 6 is proposed to be rewritten as follows; ~~The site does not contain a proposed~~ new boundaries do not bisect a Significant Natural Area or Outstanding Natural Landscape or Feature;	National Planning Standards definition of a boundary adjustment does not include subdivisions which are divided by roads or have multiple parcels. The minor alteration proposed will address this. 1. The title does not align with the intention, which is a focus on records. Records of title are saleable, and allotments aren't without a separate record of title. The proposed change will align the two. 2. As per the reason given under SUB-R1-6 previously	Accept in part
FS22.018	Clark Fortune McDonald			Support	Allow	Support - we agree the provisions should relate to titles, and that this should not be affected by SNA or ONL areas on the site unless they are adversely affected by the proposal.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	& Associates						
S121.061	Alliance Group Limited	SUB - Subdivision	SUB-R5	Support	Retain as notified	This rule would apply to the subdivision of land in the proposed RLZ to the northwest of the western site at Alliance. As such, Alliance supports the inclusion of a specific assessment matter regarding reverse sensitivity effects.	Accept
S35.046	Chorus New Zealand Limited	SUB - Subdivision	SUB-R5	Support in part	Retain SUB-R5 as notified	Restricted Discretionary activity status for subdivision which creates new allotments in all zones except the development areas, and having telecommunication servicing a matter of discretion is supported	Accept
S40.042	Silver Fern Farms	SUB - Subdivision	SUB-R5	Support	Retain as notified	This rule would apply to the subdivision of land in the proposed RLZ to the northwest of Silver Fern Farms's site. As such, Silver Fern Farms supports the inclusion of a specific assessment matter regarding reverse sensitivity effects.	Accept
S126.119	Southland Federated Farmers of New Zealand	SUB - Subdivision	SUB-R5	Support	Retain SUB-R5 as drafted.	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).	Accept
S154.046	Spark New Zealand Trading Limited	SUB - Subdivision	SUB-R5	Support in part	Retain SUB-R5 as notified	Restricted Discretionary activity status for subdivision which creates new allotments in all zones except the development areas, and having telecommunication servicing a matter of discretion is supported	Accept
S32.046	One New Zealand	SUB - Subdivision	SUB-R5	Support in part	Retain SUB-R5 as notified	Restricted Discretionary activity status for subdivision which creates new allotments in all	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	Group Limited					zones except the development areas, and having telecommunication servicing a matter of discretion is supported	
S33.046	FortySouth	SUB - Subdivision	SUB-R5	Support in part	Retain SUB-R5 as notified	Restricted Discretionary activity status for subdivision which creates new allotments in all zones except the development areas, and having telecommunication servicing a matter of discretion is supported	Accept
S37.046	Connexa Limited	SUB - Subdivision	SUB-R5	Support in part	Retain SUB-R5 as notified	Restricted Discretionary activity status for subdivision which creates new allotments in all zones except the development areas, and having telecommunication servicing a matter of discretion is supported	Accept
S115.120	Kevin Robertson	SUB - Subdivision	SUB-R5	Support	Retain SUB-R5 as drafted.	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).	Accept
S143.131	Rural Ratepayers Group	SUB - Subdivision	SUB-R5	Support	Retain SUB-R5 as drafted.	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).	Accept
S148.132	Alistair & Bernadette Hunt	SUB - Subdivision	SUB-R5	Support	Retain SUB-R5 as drafted.	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).	Accept
S60.122	Ronald Crispin	SUB - Subdivision	SUB-R5	Support	Retain SUB-R5 as drafted.	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).	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S68.240	John Baynes	SUB - Subdivision	SUB-R5	Support	Retain SUB-R5 as drafted.	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).	Accept
S110.040	Royal Forest and Bird Society of NZ Inc	SUB - Subdivision	SUB-R5	Amend	Add: 15. Effect on ecological values or indigenous biodiversity	Allows ecology and/or indigenous biodiversity to be taken into account as a matter of 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.	Reject
FS5.98	Hamish Weir			Oppose	Disallow		Accept
S112.080	Waka Kotahi NZ Transport Agency	SUB - Subdivision	SUB-R5	Support in part	Amend SUB-R5 as follows: Matters for discretion: 5. The effects of traffic generation on the safe and efficient operation of the transport network. This includes the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the access connects to any State Highway.	Waka Kotahi supports the rule in particular those Matters of discretion which promote active modes and protect the state highway from reverse sensitivity effects. However, in respect to point 5, we recommend that this matter is amended to include the outcome of any consultation with Waka Kotahi New Zealand Transport Agency where the access connects to any State highway.	Reject
FS5.99	Hamish Weir			Oppose	Disallow	Unnecessary additional wording	Accept
S124.028	Fire and Emergency NZ	SUB - Subdivision	SUB-R5	Support in part	Amend as follows: 9. Provision for servicing, including water supply, firefighting water supply in accordance with SNZ PAS 4509:2008 , wastewater treatment and disposal, stormwater design and disposal, electricity and telecommunications.	Fire and Emergency support the requirement to have the provision for servicing including firefighting water supply. However, Fire and Emergency seek that specific firefighting water supply is provided for in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice - SNZ PAS 4508:2008.	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS5.100	Hamish Weir			Oppose	Disallow	Specific standards that could out date should not be included	Accept
S99.011	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-R5	Not Stated	SUB-R5 is re-worded for 'activity status where compliance not achieved' to be a discretionary status.	A breach of those standards can be marginal, insignificant or does not prevent compliance with objectives and policies, character and amenity values, a non-complying activity status is considered to be a test which is impractical and inappropriate.	Reject
FS5.101	Hamish Weir			Support	Allow		Reject
S132.063	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-R5	Amend	Amend SUB-R5 as follows: Matters of discretion: 9. Provision for servicing, including water supply, fire fighting water supply, wastewater treatment and disposal, stormwater design and disposal for the safe disposal of stormwater that does not result in increased flooding and erosion risk , electricity and telecommunications. 14 Reverse sensitivity on adjacent land uses, to protect the function and operation of , airports, railway lines and State Highways.	KiwiRail generally supports the matters of discretion but seek to ensure safe stormwater disposal that does not increase flood and erosion risk and to protect the function and operation of railways from reverse sensitivity effects.	Reject
FS5.102	Hamish Weir			Oppose	Disallow	Covered by the Subdivision and Development Bylaw	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S85.106	Environment Southland	SUB - Subdivision	SUB-R5	Support in part	Give greater emphasis on natural hazards (more emphasis on avoid in the first instance)	The wording in the areas of discretion are enabling and potentially cannot be relied on in their own right to decline a subdivision in a natural hazard area.	Reject
FS5.103	Hamish Weir			Oppose	Disallow		Accept
FS22.020	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - many subdivisions in natural hazard areas remain appropriate and are for land management rather than development reasons or hazards can be managed appropriately, and natural hazard assessment is already required as part of the subdivision consent process.	Accept
S99.007	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-R5	Not Stated	Rule 5 is re-worded from ' ~~the site does not contain ...~~ ', to read ' the boundary adjustment does not have an adverse effect in relation to ... '	Unilaterally exclude a boundary adjustment from having a controlled activity status even if any boundary adjustment does not have an effect on those features.	Reject
FS11.015	Heritage New Zealand Pouhere Taonga			Oppose	Disallow	The setting of a historic heritage place may contribute significantly to its overall heritage value. The proposed amendment would allow for boundary adjustments to places on the HH-SCHED1 as a controlled activity. An application for a controlled activity cannot be declined (except if s106 of the RMA applies). Determining whether a boundary adjustment does or does not have an adverse effect on historic heritage requires further assessment and consultation with HNZPT is anticipated. If an activity is a controlled activity, resource consent applications may be notified, although it is common for them to be non-notified.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						This amendment would not provide for s6(f) of the RMA nor HH-O3 of the proposed District Plan.	
S74.018	Hamish Weir	SUB - Subdivision	SUB-R5	Support in part	Retain this rule with a minor amendment: 9; 9. Provision for servicing, including water supply, firefighting water supply, wastewater treatment and disposal, stormwater design and disposal, electricity and telecommunications (including by wireless means) 2. Non-conformance to the standards should be Discretionary .	With the gradual scaling back of the historic copper network and provision of telecommunications, in this predominantly rural district, are more commonly by wireless means. This addition to the matter of discretion clarifies that unaffordable extensions to underground fibre network are not required. Chorus often try to take advantage of any District Plan requirements to fund their programmed network extensions which this alteration would prevent. Minor non conformance should not be elevated beyond Discretionary status.	Reject
FS22.019	Clark Fortune McDonald & Associates			Support	Allow	Support - we agree that provisions should specifically include wireless telecommunications options.	Reject
S99.009	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-R7	Not Stated	Rule 7 is re-worded from ' ~~the site does not contain ...~~ ', to read ' the boundary adjustment does not have an adverse effect in relation to ... '	Unilaterally exclude a boundary adjustment from having a controlled activity status even if any boundary adjustment does not have an effect on those features.	Reject
FS11.017	Heritage New Zealand Pouhere Taonga			Oppose	Disallow	The setting of a historic heritage place may contribute significantly to its overall heritage value. The proposed amendment would allow for boundary adjustments to places on the HH-SCHED1 as a controlled activity. An application for a controlled activity cannot be declined (except if s106 of the RMA applies). Determining whether a	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						boundary adjustment does or does not have an adverse effect on historic heritage requires further assessment and consultation with HNZPT is anticipated. If an activity is a controlled activity, resource consent applications may be notified, although it is common for them to be non-notified. This amendment would not provide for s6(f) of the RMA nor HH-O3 of the proposed District Plan.	
S99.010	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-R8	Not Stated	Rule 8 is re-worded from ' ~~the site does not contain ...~~ ', to read ' the boundary adjustment does not have an adverse effect in relation to ... '	Unilaterally exclude a boundary adjustment from having a controlled activity status even if any boundary adjustment does not have an effect on those features. Rule 8 effectively excludes around half of Gore and many rural areas from affording a controlled activity status for any boundary adjustment	Reject
FS11.018	Heritage New Zealand Pouhere Taonga			Oppose	Disallow	The setting of a historic heritage place may contribute significantly to its overall heritage value. The proposed amendment would allow for boundary adjustments to places on the HH-SCHED1 as a controlled activity. An application for a controlled activity cannot be declined (except if s106 of the RMA applies). Determining whether a boundary adjustment does or does not have an adverse effect on historic heritage requires further assessment and consultation with HNZPT is anticipated. If an activity is a controlled activity, resource consent applications may be notified, although it is common for them to be non-notified. This amendment would not provide for s6(f) of the RMA nor HH-O3 of the proposed District Plan.	Accept
S112.081	Waka Kotahi NZ	SUB - Subdivision	SUB-R12	Support	Retain as notified	Waka Kotahi supports the rule that subdivision within the Maitai River Floodway is a non-	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	Transport Agency					complying activity to appropriately manage the risks of subdivision including associated infrastructure within a known flood zone	
FS22.023	Clark Fortune McDonald & Associates			Oppose	Disallow	Oppose - subdivision in itself has no risks to infrastructure within a flood zone, as subdivision can be undertaken for purposes other than development. The focus should be on limiting development within the floodway, not subdivision.	Reject
S112.082	Waka Kotahi NZ Transport Agency	SUB - Subdivision	SUB-S1	Support	Retain as notified	Waka Kotahi supports this rule where the activity status where compliance is not achieved with minimum lot size for each zone is a non-complying activity.	Accept
S126.120	Southland Federated Farmers of New Zealand	SUB - Subdivision	SUB-S1	Support in part	Retain SUB-S1 as drafted.	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'.	Accept
S132.065	KiwiRail Holdings Ltd	SUB - Subdivision	SUB-S1	Support	Retain SUB-S1 as proposed.	Supports ensuring lot sizes that do not meet the minimum specified lot size are Non-Complying, as clusters of small lot sizes have the potential to create significant demands on existing infrastructure networks.	Accept
S99.014	Clark Fortune McDonald & Associates	SUB - Subdivision	SUB-S1	Not Stated	General Residential - A change of the 400m ² minimum area from a ~~net~~ area to a gross area Clarification to confirm whether a 2-lot subdivision would comply where one lot	Proposed rule contradicts zone objectives (infill, housing typology variety compact urban character and efficient use of land), hindering infill subdivision on typical 809m ² residential sections. These residential allotments can provide for infill	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					is bare land above the minimum area and one lot is below the minimum area but with an existing dwelling. If the rule intends that a second dwelling needs to be built prior to subdivision for compliance, then wording should clarify.	subdivision with two gross areas of 400m ² as required by the Operative District Plan (ODP) but cannot provide for two net areas of 400m ² due to the area for access to a rear lot being excluded from the net area by definition. While exceptions exist for existing dwellings in Note 1, the requirement for constructing units before subdivision is unclear and may discourage empty section subdivision.	
FS28.048	Kainga Ora			Support	Allow	Kāinga Ora agrees with this submission point.	Accept
S74.020	Hamish Weir	SUB - Subdivision	SUB-S1	Oppose	Non-conformance to the standards should be Discretionary .	The submitter opposes the determination of non-conformance. Address minor non-conformances, like a 10m ² shortfall or >1m deviation in shape factor, through specific conditions and mitigation methods. This approach avoids expensive consent hearings and neighbor disputes, preventing potential setbacks for valuable projects that could otherwise be jeopardized, to the detriment of the district.	Reject
FS22.028	Clark Fortune McDonald & Associates			Support	Allow	Support - we agree that non-conformance should be discretionary, not non-complying as many non-conformance issues are minor, do not have any significant adverse effects or can be mitigated by other methods.	Reject
S100.006	Charlton Rise Limited	SUB - Subdivision	SUB-S2	Support	Retain as notified.		Accept
S74.021	Hamish Weir	SUB - Subdivision	SUB-S2	Oppose	Non-conformance to the standards should be Discretionary .	The submitter opposes the determination of non-conformance. Address minor non-conformances, like a 10m ² shortfall or >1m deviation in shape	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						factor, through specific conditions and mitigation methods. This approach avoids expensive consent hearings and neighbor disputes, preventing potential setbacks for valuable projects that could otherwise be jeopardized, to the detriment of the district.	
FS22.041	Clark Fortune McDonald & Associates			Support	Allow	Support - we agree that non-conformance should be discretionary, not non-complying as many non-conformance issues are minor, do not have any significant adverse effects or can be mitigated by other methods.	Reject
S74.022	Hamish Weir	SUB - Subdivision	SUB-S3	Oppose	Non-conformance to the standards should be Discretionary .	The submitter opposes the determination of non-conformance. Address minor non-conformances, like a 10m ² shortfall or >1m deviation in shape factor, through specific conditions and mitigation methods. This approach avoids expensive consent hearings and neighbor disputes, preventing potential setbacks for valuable projects that could otherwise be jeopardized, to the detriment of the district.	Reject
FS22.042	Clark Fortune McDonald & Associates			Support	Allow	Support - we agree that non-conformance should be discretionary, not non-complying as many non-conformance issues are minor, do not have any significant adverse effects or can be mitigated by other methods.	Reject
S109.015	Department of Conservation	Interpretation	wetland	Support	Retain as notified	The D-G supports the inclusion of the RMA definitions in the plan.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S126.052	Southland Federated Farmers of New Zealand	Interpretation	wetland	Support	Retain as notified	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Accept
S115.053	Kevin Robertson	Interpretation	wetland	Support	Retain as notified	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Accept
S143.064	Rural Ratepayers Group	Interpretation	wetland	Support	Retain as notified	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Accept
S148.065	Alistair & Bernadette Hunt	Interpretation	wetland	Support	Retain as notified	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Accept
S60.055	Ronald Crispin	Interpretation	wetland	Support	Retain as notified	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Accept
S68.173	John Baynes	Interpretation	wetland	Support	Retain as notified	The notified definition of wetland has the same meaning as section 2 of the RMA as well as the National Planning Standards.	Accept
S140.014	Robina Johnston	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.		Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S143.191	Rural Ratepayers Group	Whole Plan	Whole Plan	Not Stated	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.	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.	Reject
FS28.002	Kainga Ora			Oppose	Disallow	Kāinga Ora only supports the inclusion of Financial Contributions where there has been a thorough assessment to justify them, including: - Clarity and transparency around how they are calculated - Can be directly related to an effect - Are not confused by/ or duplicate the existing development contribution scheme	Reject
FS22.079	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - while financial contributions may potentially be appropriate if maintained at a low enough level (relative to land values and construction costs) that they do not stifle development, the submitter may have overlooked that practically all infrastructure for new developments is paid for and constructed by the developer before being vested in Council.	Reject
S126.179	Southland Federated Farmers	Whole Plan	Whole Plan	Not Stated	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	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	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	of New Zealand				recommend the Council enables Financial Contributions through another means such as a financial contributions policy.	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.	
FS22.052	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - while financial contributions may potentially be appropriate if maintained at a low enough level (relative to land values and construction costs) that they do not stifle development, the submitter may have overlooked that practically all infrastructure for new developments is paid for and constructed by the developer before being vested in Council.	Reject
FS22.078	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - while financial contributions may potentially be appropriate if maintained at a low enough level (relative to land values and construction costs) that they do not stifle development, the submitter may have overlooked that practically all infrastructure for new developments is paid for and constructed by the developer before being vested in Council.	Reject
S60.182	Ronald Crispin	Whole Plan	Whole Plan	Not Stated	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.	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	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						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.	
FS22.076	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - while financial contributions may potentially be appropriate if maintained at a low enough level (relative to land values and construction costs) that they do not stifle development, the submitter may have overlooked that practically all infrastructure for new developments is paid for and constructed by the developer before being vested in Council.	Reject
S68.300	John Baynes	Whole Plan	Whole Plan	Not Stated	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.	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.	Reject
FS22.077	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - while financial contributions may potentially be appropriate if maintained at a low enough level (relative to land values and construction costs) that they do not stifle development, the submitter may have overlooked	Reject

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						that practically all infrastructure for new developments is paid for and constructed by the developer before being vested in Council.	
S148.192	Alistair & Bernadette Hunt	Whole Plan	Whole Plan	Not Stated	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.	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.	Reject
FS22.080	Clark Fortune McDonald & Associates			Oppose in part	Disallow in part	Oppose (in part) - while financial contributions may potentially be appropriate if maintained at a low enough level (relative to land values and construction costs) that they do not stifle development, the submitter may have overlooked that practically all infrastructure for new developments is paid for and constructed by the developer before being vested in Council.	Reject
S115.180	Kevin Robertson	Whole Plan	Whole Plan	Not Stated	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.	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	Reject

APPENDIX B – Recommendations on Submissions – Subdivision Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						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.	