

1. General Issues

Submission No. and Point / Submitter Name	Plan Provision	Summary of Submission	Decision Requested
LAYOUT			
18.89 Environment Southland	General	The submitter considers the numbering of Section 3 to be confusing.	Consider reformatting the numbering/structuring of the Rule statements and supporting clauses.
34.1 Silver Fern Farms Ltd	General	<p>Support in part. The submitter is generally supportive of the Proposed District Plan as it provides a clear direction in an easy to navigate format. The submitter is particularly supportive of the use of specific zoning and the discouragement of activities locating outside of designated zones as this reduces the potential for conflict due to reverse sensitivity and differing expectations of amenity.</p> <p>The submitter explains that reverse sensitivity can cause conflict and curtail the ability to operate efficiently, increasing risks and reducing future viability.</p> <p>The submitter states that well serviced industrial areas often limited and need to be protected. Rural areas are also important in that they offer protection for primary production activities to operate without undue restriction.</p>	<p>Retain industry specific zoning and the provision for primary production.</p> <p>Retain policies to discourage activities locating outside of zoned areas.</p>
53.1 NZ Transport Agency	General	The submitter supports the outcomes promoted through the Proposed Plan but notes that some linkages between issues, objectives and policies are not clear and some policy directions are not supported elsewhere in the Plan. The submitter considers that the adoption of a clear cross referencing approach would assist in remedying these shortfalls.	Adopt a clear cross referencing schedule between the various parts of the Plan.
53.2 NZ Transport Agency	General	The submitter considers that some policies that are repeated throughout the zone specific sections of the Plan are clearly of concern on a district-wide basis but are not included as a specific section to enable a more focussed approach in the zone provisions.	Consider restructuring the Plan to reduce repetition of policies relating to glare, electrical interference, lightspill, wind dilapidated structures and ill-maintained lands, and demolition or removal activities.

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65.44 65.103 65.104 ICC Environmental and Planning Services	General	The submitter notes that there is some inconsistency between headings and wording of policies and rules for the different zones that are not always necessary.	Tidy up headings to ensure consistency between Zones where this is possible
65.89 ICC Environmental and Planning Services	General	The submitter notes that the sections within Section 3 Rules should be in alphabetical order.	Ensure that the sections are in alphabetical order – e.g. Lightspill should be before Natural Features
88.2 Federated Farmers	General	The submitter holds concerns with the usability of the plan in its current format and considers a considerably more user-friendly layout would be to have the rules for each chapter accompanying the issues, objectives, policies and methods for that topic, ensuring plan users can easily ascertain what their responsibilities in a certain area are, and leading to greater plan compliance.	Not stated.
117.1 Southern District Health Board	General	Commend the Council for presenting a well set out and easy to follow document. However, believe it would be useful to have a statement explaining the rationale as to why the format has changed	Provide a statement explaining the rationale as to why the format of the District Plan has changed
GENERAL			
18.1 Environment Southland	General	Some Māori words in the District Plan are missing macrons – eg Ōreti, Ngāi Tahu, Ōmaui and Rūnanga, and others. Council should give consideration to including macrons on relevant Māori words, to assist with pronunciation.	That the Council amend the entire District Plan (including Appendices and Planning Maps) by including macrons on relevant Māori words consistent with Te Tangi a Tauria Iwi Management Plan and the Proposed Southland Regional Policy Statement 2012 [PSRPS 2012].
52.2 NZ Police	General	The submitter notes that the Proposed Plan refers to “infrastructure”, “utilities” or “network utilities”, yet only infrastructure is defined.	Use consistent terminology for “infrastructure”, “utilities” and network utilities” throughout the Proposed Plan.
56.23 Jenny Campbell	General	The submitter considers that environmental health monitoring is an essential part of a healthy city so priority needs to be given to this in partnership with other councils.	Not stated.

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56.26 Jenny Campbell	General	The submitter encourages the promotion of Healthy Homes projects to ensure healthier lifestyles for Invercargill residents.	Not stated.
56.27 Jenny Campbell	General	The submitter commends and advocates of the continued use of awards for promoting positive activity in the ICC area.	Not stated.
81.10 Progressive Enterprises Ltd	General	The submitter considers that non-compliance with a standard or rule relating to height, signage, noise, parking, access, transportation loading, should be provided for as restricted discretionary activity where the Council's restriction is limited to the relevant matters, rather than the proposed discretionary activity status.	Review standards to change activity status for breaches relating to height, signage, noise, parking, access, and transportation loading to be restricted discretionary rather than the proposed discretionary activity status.
87.1 Transpower NZ Ltd	General	The submitter suggests that people understand what the National Grid is but not the difference between transmission and distribution lines and therefore it is appropriate and correct to refer to 'National Grid' rather than 'electricity transmission'	Amend where appropriate references to 'electricity transmission' to 'National Grid'. AND Any consequential amendments.
88.1 Federated Farmers	General	The submitter is concerned that some of the changes proposed within the District Plan have the potential to result in high economic and social costs in the rural area, and these costs have not been adequately considered nor had proper account taken of them within the Plan's Section 32 cost-benefit analysis.	Not stated.
103.75 Invercargill Airport Ltd	General	The submitter believes the provision inserted into the operative District Plan by way of Plan Change 10 relating to the Airport should be reinserted in an appropriate format into the Proposed District Plan	Insert the provision relating to the Airport inserted into the operative District Plan via Plan Change 10.
102.24 Chorus NZ Ltd	General	The submitter would like to see any consequential amendments, improvements to wording of Objectives, Policies, Rules, explanations and appendices, or improvements of mapping that gives effect to any part of their submission or is required to improve the functionality and clarity of the Proposed Plan	Consequential amendments to the Plan giving effect to any part of their submission
104.23 Telecom NZ Ltd	General	The submitter would like to see any consequential amendments, improvements to wording of Objectives, Policies, Rules, explanations and appendices, or improvements of mapping that gives effect to any part of their submission or is required to improve the functionality and	Consequential amendments to the Plan giving effect to any part of their submission

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		clarity of the Proposed Plan	
105.12 ICC Environmental Health and Compliance Services	General	<p>The submitter notes that the Council's Keeping of Animals, Poultry and Bees Bylaw definition of "urban area" refers to the District Plan definition of urban areas. In the operative Plan this definition did not include Otatara.</p> <p>The submitter would like the Proposed District Plan to define urban area and include Otatara within that area to ensure that the Bylaw can be readily enforced.</p>	That the definition of urban areas be included in the District Plan and that this includes Otatara
107.2 A4 Simpson Architects Limited	General	The submitter supports the general Plan approach aimed at providing for infill residential development within the city limits rather than "Greenfields" development in rural areas.	Set clear direction through zoning as to where residential development is appropriate and avoid "Greenfields" development in rural areas
107.23 A4 Simpson Architects Ltd	General	The submitter opposes reference to "lifestyle block" throughout the Plan as it gives a false impression of the reality of living in a rural environment.	Change reference of the term "lifestyle block" to "rural-residential" throughout the Plan
24.1 South Port NZ Ltd	Section 2	<p>The submitter does not consider that the more general objectives and policies within the Proposed Plan that relate to infrastructure and transportation provide adequate and appropriate recognition of the Port as significant infrastructure. As drafted, objectives and policies relating to infrastructure and transportation do not provide sufficient, specific recognition for the Port. Instead these objectives and policies read more like higher level objectives and policies that would normally be set out in a Regional Policy Statement. The submitter considers that the current approach to objectives and policies within the Proposed Plan contravenes the direction required by these higher level planning documents.</p> <p>The submitter notes that there are specific objectives and policies relating to the Port operations within the Seaport Zone, however this only provides for activities within the Seaport Zone, and does not serve to adequately protect the Port from incompatible activities or reverse</p>	<p>Not stated.</p> <p>It is considered the submitter requests the following: To include as part of the District Wide objectives and policies, specific provisions relating to the Port of Bluff that explicitly recognise the contribution of the Port to the economic and social wellbeing of the City and Region, and to also effectively provide for its ongoing operation and future growth.</p>

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		sensitivity effects that might be proposed adjacent to the Port and outside the Seaport zone.	
26.5(b) NZ Defence Force	Section 2	The submitter states that defence facilities are key strategic infrastructure of regional and national importance, playing a significant role in both military training and civil and/or national defence operations. They also provide a range of economic and social benefits to the region and it is necessary that these are recognised and accommodated within the Proposed District Plan.	Reference to 'strategic infrastructure' alongside all objectives and policies in Section 2 that reference local, regional and national infrastructure.
53.3 NZ Transport Agency	Section 2 – Methods of Implementation	<p>The submitter is unclear of the intent of the method that appears throughout the Plan in the zone specific sections, which appears to promote that the NZ Transport Agency will be considered an affected party for all transport issues.</p> <p>The submitter supports that the Plan recognises that the Transport Agency has a significant role in managing the transport network within the District.</p>	<p>Retain this method in those sections of the plan that it has been included in, but with the amended wording below:</p> <p><i>Actively seek engagement with the NZ Transport Agency in managing the transport issues within the City.</i></p>
87.2 Transpower NZ Ltd	Section 2 – Introduction	The submitter is concerned that the issues, objectives and policies that seek to provide for, manage the effects of and on the National Grid may be overlooked by those undertaking works/development within a zone. Such persons are likely to refer only to the relevant zone section and not realise that important objectives and policies that manage effects on the National Grid are contained in a separate section. The submitter suggests a note in the introduction to Section 2, referring plan users to the Infrastructure section for all objectives and policies relating to the National Grid.	<p>(i) Amend Introduction 2.1 as follows:</p> <p>ZONE SPECIFIC</p> <p><u>Note: Refer to 2.9 Infrastructure for all Issues, Objectives and Policies that seek to provide for, manage the effects of and on the National Grid i.e. the subdivision of land within the National Grid corridor.</u></p> <p>2.19 Airport Operations</p> <p>(ii) And any consequential amendments.</p>
15.25 Ballance Agri-Nutrients	Section 3	Oppose (in part).	i. That section 3 – District Wide Rules be amended to include a default permitted activity status for the

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Ltd		<p>The submitter is concerned that the District Wide rules do not include provision for the construction of buildings and structures to occur as a permitted activity.</p> <p>The submitter notes that the construction of buildings and structures is specifically managed elsewhere within the Proposed Plan. For example, Rule 3.32.2(A) prescribes a Controlled Activity status for the erection buildings and structures within the Industrial 4 (Awarua) Zone.</p> <p>Additionally, the Chapter 4 definitions for individual activities, whilst generally making reference to the use of buildings and structures, do not specifically include the construction of the same.</p> <p>Given the foregoing, and that the default activity status for activities not specifically listed is generally Non-Complying, the submitter is concerned about the uncertainty created by the Proposed Plan in relation to the construction or placement of buildings.</p>	<p>erection of buildings in association with permitted activities.</p> <p>ii. Any similar amendments to like effect.</p> <p>iii. Any consequential amendments that stem from the amendment set out above.</p>
26.2 NZ Defence Force	Section 3	<p>Oppose (in part).</p> <p>The submitter notes that although Temporary Military Training Activities are recognised in the District Wide noise rules (Rule 3.13.10), the Proposed Plan does not appear to actually permit the activity itself. The submitter supports Temporary Military Training Activities being given permitted status in all zones, subject to appropriate noise standards. The submitters considers that noise is the only effect with the potential to be more than minor, and therefore is the only effect that needs to be controlled by performance standards.</p> <p>The submitter considers that restricted discretionary activity status is appropriate for Temporary Military Training Activities that do not comply with the permitted noise standards. Noise is the only effect with the potential to be more than minor, and this can be appropriately assessed</p>	<p>a) Include a separate permitted activity rule for Temporary Military Training Activities subject to specified noise limits (based on the criteria detailed in Submission Point 3 below) in all zones</p> <p>b) Include a restricted discretionary activity rule for Temporary Military Training Activities that do not comply with specified noise limits, with noise being the only assessment criteria that the Council has restricted discretion over in assessing a resource consent application.</p>

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		through listing this as a matter over which discretion is retained in a restricted discretionary.	
31.1 R T Chapman	Section 3	The submitter states that “Recreational Activity” is defined in Section Four but is neither a permitted or discretionary activity in any zone and is therefore a non-complying activity. The submitter considers that Recreational Activity should be a permitted activity in every zone.	Amend Section Three to provide for Recreation Activity to be a permitted activity in every zone.
79.28 KiwiRail Holdings Ltd	Section 3	The submitter considers that the protection of significant transport networks should be included as a matter of discretion for all discretionary activities in the Plan	<p>Include an additional assessment criterion for all discretionary activities: <u>“Whether the design, including location, and methods and construction techniques proposed are likely to avoid or mitigate reverse sensitivity effects on the strategic road and rail network.</u></p> <p><u>Assessment criteria for vibration:</u> The Council will consider a proposal for a restricted discretionary activity against the criteria below:</p> <ul style="list-style-type: none"> (a) <u>The size, nature and location of the building on the site</u> (b) <u>Special topographical, building features or ground conditions which will mitigate vibration impacts</u> (c) <u>Any characteristics of the proposed use which make compliance with the standard unnecessary</u>
87.55 Transpower NZ Ltd	Section 3 – Zone rules	The submitter is concerned that the rules relevant to the National Grid may be overlooked by those undertaking works/development within a zone Plan users are likely to only refer to the relevant zone section and not realise that important rules that manage effects on the National Grid are contained in a separate section. The submitter seeks to include a note at the beginning of the Zone Rules section, referring plan users to the Infrastructure section for all rules relating to the National Grid.	<p>(i) Amend Zone Rules as follows: ZONE RULES</p> <p><u>Note: Refer to 3.9 Infrastructure for all rules and assessment matters relating to the National Grid including those managing the setback of development and activities from National Grid</u></p>

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			<p><u>transmission lines and structures.</u></p> <p>3.21 Airport Operations Zone</p> <p>(ii) And any consequential amendments.</p>
MAPS			
65.127 ICC Environmental and Planning Services	Planning Maps	The submitter notes that the mapping of the Council Parks and reserves is incomplete and inaccurate	Review the data used to map the Parks and Reserves on the Planning Maps and amend maps where necessary
68.1 ICC Parks Division	Planning Maps	The submitter is concerned that the mapping of the Council Parks and Reserves is incomplete and inaccurate and lists all areas that should be shown on the Planning Maps	Amend Planning Maps by showing all parks and reserves clearly as per the list provided.
69.6 ICC Roading Manager	Planning Maps	The submitter considers that the mapping of the service lanes is confusing and inaccurate	Review the mapping of the service lanes, particularly where they have been vested as roads
87.62 Transpower NZ Ltd	Planning Maps	The submitter would like Council to review the placement of the HV Transmission Lines on the planning maps as on Planning Maps 3 and 12 there are two Transpower lines (INV-MAN-A) shown running north from the substation on Tuai Street. There should only be one line.	<p>(i) That the identification of HV Transmission lines on the planning maps be retained but that the number of lines be checked, and corrected where required to accord with Transpower asset information. Transpower is happy to provide the GIS files that set out the correct location and number of lines.</p> <p>(ii) And any consequential amendments.</p>
18.108 Environment Southland	Hazard Maps	The submitter believes the coastal erosion symbol is incorrect.	Show coastal erosion symbol as a line rather than a polygon or box
18.109 Environment Southland	Hazard Maps	The submitter believes the current descriptor "Coastline prone to erosion" could suggest a false degree of absoluteness, accuracy or certainty when the reality is that most of the "soft" coastline within and near the margin of the Invercargill District is eroding, some a lot more than others. The submitter believes this situation will continue and	Amend the descriptor to 'Coastline most prone to erosion'

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		probably accelerate as sea level continues to rise and the descriptor needs to be changed to one that does not give the impression that the mapped areas are the only ones subject to erosion.	
18.110 Environment Southland	Hazard Maps	The submitter believes the line needs to be extended in various locations – eg Omaui, Oreti Beach and the Tiwai Peninsula to reflect the erosion that has occurred, become apparent or been an issue since the mapping was done for the original District Plan.	Extend the line as shown in red on the maps attached to the submission.
65.128 ICC Environmental and Planning Services	Hazard Maps	The submitter notes that there may be areas of filled land that are not shown on the Hazard Maps	Review the data used to map the Filled Land on the Hazard Maps and amend maps where necessary
78.32 Ministry of Education	Planning Map 6	Support in part, but consider the mapping of Designation 34 Waikiwi Kindergarten does not show all of the legal description	Amend Planning Map 6 by modifying the designation boundary for Designation 34 by including Part Lot 28, DP194
107.26 A4 Simpson Architects Limited	Planning Map 6	<p>The submitter opposes the zoning of the Waikiwi Shopping Centre/School site.</p> <p>The submitter believes that the zoning should reflect a proposed improvement to the North Road/ Bainfield Road/Durham Road intersection.</p> <p>The submitter believes that there should also be some Residential 1A zone in this area.</p>	Amend Planning Map 6
86.1 Leven Developments Ltd	Planning Maps 6 and 8	<p>The submitter opposes the zoning of 4 Beatrice Street (held in SL183/122) as Rural 2 given its size and the location of the land in relation to its isolation from other rural land and in context of surrounding developments.</p> <p>The submitter considers that the land is not suited for the activities listed as permitted in the Rural 2 Zone and request that it be rezoned Business 6.</p>	Rezone 4 Beatrice St as Business 6 (details of what is proposed for the Business 6 Zone are set out in the submission)

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		The submitter considers that hazard risks can be addressed by requiring minimum floor levels for buildings in the area.	
67.3 ICC Drainage Manager	Hazard Maps 16 and 17	The submitter considers the flood banks around the New River Estuary on Hazard Maps 16 and 17 are inaccurate	That the stopbank position around the New River Estuary be corrected
71.69 NZAS Ltd	Smelter Zone Planning Maps in 27, 29 and 31	Support. The submitter supports the Smelter Zone as identified on the Maps	Retain the Smelter Zone
71.70 NZAS Ltd	Rural 1 Zone in Planning Maps 22, 23, 27, 29, 30, 31 and 32	Support. The submitter supports the Rural 1 Zoning adjoining the Smelter Zone and more generally on the Tiwai Peninsula.	Retain the Rural 1 Zone
71.71 NZAS Ltd	Outstanding Natural Landscape on Planning Map 27, 29, 30, 31 and 32	Support. The submitter considers that it would be inappropriate to identify the Smelter Zone as an "outstanding natural landscape" given the highly modified nature of it.	The Outstanding Natural Features and Landscapes overlay not to be applied to the Smelter Zone, as notified.
53.93 NZ Transport Agency	Planning Map 17	The submitter supports the change in zoning for two properties located at 461 and 471 Bluff Highway. There is potential for reverse sensitivity issues to arise from use of the State highway and rail corridor if these properties were developed for residential purposes. The submitter considers that they are not well suited to residential development and as such should be rezoned as proposed.	Adopt the proposed change in zoning from Domicile Sub-Area to Industrial 1 Zone for 461 and 471 Bluff Highway.
INFOGRAMS			
71.47 NZAS Ltd	Infogram 1	Support in part. The submitter would like the Tiwai Wharf shown on this map	Amend Infogram 1 to include Tiwai Wharf
71.48 NZAS Ltd	Infogram 2	Support. The submitter supports the roading hierarchy showing identifying Tiwai Rd as a minor arterial road	Retain identification of Tiwai Road as a minor arterial road
83.1 Philip Orr	Infogram 4	Oppose. The submitter questions the reduction of height for accessory buildings from 2.2m. The submitter considers that this will result in the reduction of usable space on a property	Not stated

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107.19 A4 Simpson Architects Limited	Infogram 4	The submitter opposes the use of Infogram 4 on the grounds that the proposed 2m height limit on the boundary is too low.	Amend the starting height of buildings on the boundary to 2.6m rather than 2m
83.2 Philip Orr	Infogram 5	Oppose. The submitter is concerned that this Infogram will result in living areas open to the prevailing winds and that compliance with the standard will result in more complicated design requirements. The submitter suggests that there are alternative design solutions available to enable access to sunlight in the living areas and other areas of dwellings.	
DILAPIDATED STRUCTURES AND ILL-MAINTAINED LAND			
105.10 ICC Environmental Health and Compliance Services	General	The submitter supports inclusion of zone specific policies relating to dilapidated structures and ill-maintained lands and supports the use of the Building Act 2004 and the RMA to ensure that buildings and sections are well maintained and have a tidy outlook or appearance.	Support zone specific policies on dilapidated structures and ill-maintained lands
SMOKE, ODOUR, FUMES AND DUST			
105.10 ICC Environmental Health and Compliance Services	General	The submitter notes that smoke, odour, dust and fumes create nuisances and recommends that provisions are included in the Plan to deal with these. The submitter does recognise that Environment Southland is responsible for controlling discharge to air.	The submitter recommends: a. The inclusion of zone specific policies for odour b. Specific provision is made for smoke, odour, fumes and dust
RAIL CORRIDOR			
79.24 KiwiRail Holdings Ltd	New District-wide Rule	The submitter considers that there is a need to include a district wide rule requiring setbacks and buffers along the rail corridor to ensure amenity can be encouraged for noise sensitive developments	Add a new rule (detailed in the submission) to deal with buildings setbacks, setbacks of trees and shrubs, setbacks for fencing, and screening of storage areas along the rail corridor

KENNINGTON			
59.1 Quenton Stephens	General	The submitter states that the Council needs to carefully consider the zoning approach to Kennington township. He explains that the industrial land use activity in Kennington is having a detrimental impact on residents and the existing sawmill operation gives rise to excessive noise. The submitter considers that the existing and proposed industrial zoning of the land permits the land use activities at the sawmill hat give rise to dust issues. The submitter explains that residences at Kennington predate major expansion at the sawmill and continued expansion of industrial activity is eroding the amenity if the area. The submitter considers that Council needs to progress enforcement around the noise and dust issues and at the same time ensure that the provisions of the District Plan ensure that residential activity is not unduly affected by the operations of the sawmill.	Adopt appropriate zoning controls and plan rules to address potential conflict between industrial and rural residential land use in Kennington. Introduce rules that will avoid, remedy or mitigate the emission of noise, dust and other adverse environmental effects from land use activities in the Industrial 3 Zone.
NON-RESOURCE MANAGEMENT ISSUES			
Jenny Campbell 56.22	Animal Control	The submitter supports the idea of dealing with dangerous dogs by registering the owners rather than the dogs, and requiring that they attend dog obedience and care classes, putting the responsibility back on people rather than the dog	Not stated.
82.3 Neil Thomas	Vibrant Invercargill	The submitter is concerned that there should be no changes to the status of Vibrant Invercargill without a vote by the CBD business holders	Not stated
82.4 Neil Thomas	I Site	The submitter considers that an I Site should be located within the CBD	Not stated