

## 14. Natural Features, Landscapes and Townscapes

Submission No. and Point / Submitter Name	Plan Provision	Summary of Submission	Decision Requested
	<b>General</b>		
<b>77.28 Te Runaka o Waihopai and Te Runaka o Awarua</b>	General	The submitter considers that the identification of outstanding natural features and landscapes is not complete as there are a number of sites that the submitter considers have particular cultural value that should be recognised. The submitter also refers to a landscape assessment that was carried out by Environment Southland	Amend maps to be more inclusive of areas considered cultural outstanding landscapes.  Align with Environment Southland commissioned report and landscapes identified therein.
<b>18.52 Environment Southland</b>	References to 'locally significant' natural features and landscapes.	The submitter points out that the Proposed Regional Policy Statement uses the term 'locally distinctive and valued natural features and landscapes'. For consistency it is suggested both documents should utilise a common term for the second tier of landscapes.	Change references to 'locally significant natural features and landscapes' to 'locally distinctive and valued natural features and landscapes'.
<b>18.53 Environment Southland</b>	Identification of 'outstanding' and 'locally significant', natural features and landscapes	The submitter points out that Coastal ONFLs within the proposed plan do not align with those identified in the landscape assessment that Environment Southland commissioned for the Invercargill City Council's coastal environment.  The submitter also points out that the maps within the Proposed District Plan map do not currently delineate 'locally significant' landscapes.	Review ONFLs identified within the proposed plan to ensure all ONFLs are identified.  Show the second tier of landscapes on the planning maps within the Proposed District Plan.
<b>21.2 Susan and Alastair Stark</b>	Omaui	Omaui has very special features that need recognition	Not stated.
<b>SECTION 2.10 ISSUES OBJECTIVES AND POLICIES</b>			
	<b>Introduction</b>		
<b>18.54 Environment Southland</b>	Introduction	The submitter believes that the introduction to this section should clarify that the harbours, beaches and estuaries listed are also within the city boundaries and administered in part by the City Council.	Amend the second to last paragraph to read "Bluff Harbour ...and Waihopai Rivers are <b>also</b> within the CMA which, for Resource Management Act purpose, is administered by Environment Southland."
<b>65.27 ICC Environmental and Planning Services</b>	Introduction	Support in part. The submitter considers that the descriptions of the Outstanding Natural Features and Landscapes do not reflect all relevant values.	Develop descriptions of the Outstanding Natural Features and Landscapes to ensure that all values are detailed, giving particular reference to the criteria for identification as detailed in Policy 1.

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71.19 NZAS Ltd	Introduction	Support. The submitter refers specifically to the acknowledgement in the introduction of the aluminium smelters existence within the Bluff Harbour/Awarua Bay landscape and the fact that the landscape has already been modified.	Retain reference to the aluminium smelter in the paragraph relating to the Bluff Harbour/Awarua Bay area.
77.29 Te Runaka o Waihopai and Te Runaka o Awarua	Introduction	Support but with amendment giving more recognition of the importance of landscapes to Iwi	Amend introduction by including the following: <u>“The spiritual values and stories of tangata whenua and the sense of belonging, and heritage values that flow from them are embedded in the landscape.”</u>
	<b>2.10.1 Issues</b>		
77.30 Te Runaka o Waihopai and Te Runaka o Awarua	General	Support	Retain
	<b>2.10.2 Objectives</b>		
18.55 Environment Southland	Objectives	Support.	Retain objectives
64.29 Department of Conservation	Objectives	Support. The submitter considers this objective is consistent with Part 2 of the RMA and also recognises the existence of areas of outstanding natural features and landscapes within the Invercargill district	Retain Objective 1-3
77.31 Te Runaka o Waihopai and Te Runaka o Awarua	Objectives	Support	Retain objectives
24.31 South Port NZ Ltd	Objective 1	Support.	Retain Objective 1
24.32 South Port NZ Ltd	Objective 2	Oppose. The submitter considers that the RMA does not require the protection of section 7(c) landscapes from inappropriate subdivision, use and development and that there needs to be clear distinction between those section 6(a) landscapes and those visual amenity landscapes (section 7(c)).	Amend the objective as follows: “Invercargill’s locally significant natural features and landscapes are identified and <u>appropriately managed.</u> ”
	<b>2.10.3 Policies</b>		
64.30 Department	Policies	Support. The submitter considers the identification of outstanding	Retain Policies 1-7

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<b>of Conservation</b>		natural features and landscapes to be comprehensive and that protection of them is consistent with Part 2 of the RMA	
<b>18.56 Environment Southland</b>	Policy 1 – Criteria for Identification	The submitter believes that this criterion does not align with the criteria within the Proposed Regional Policy Statement 2012.	Ensure the criteria are consistent with those identified in the Proposed Regional Policy Statement 2012.
<b>24.33 South Port NZ Ltd</b>	Policy 1 – Criteria for Identification	Support. The submitter considers the policy should also recognise the extent to which landscape values have already been modified by subdivision, use and/or development.	Add a new (H) which reads: <u>The extent to which landscape values have already been modified by subdivision, use and/or development.</u>
<b>77.32 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 1 – Criteria for Identification	The submitter notes that the list of criteria is missing points from the proposed Southland Regional Policy Statement 2012	Align with the Proposed Regional Policy Statement for Southland 2010
<b>77.33 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 2 – identification and characterisation of outstanding natural features and landscapes	The listed areas are supported but the submitter considers the mapping of them is not inclusive enough	Ensure that the identified areas are more inclusive to capture all outstanding landscapes and to ensure they represent Iwi opinions
<b>18.57 Environment Southland</b>	Policy 3 – Protection for Outstanding Natural Features and Landscapes	The submitter is concerned that the inclusion of the words ‘associated vegetation and habitats’ narrows the focus of the policy.  The submitter agrees that vegetation and habitats are an important part of many of the district’s ONFLs. However, it considers that vegetation and habitats are a part of the landscapes identity and intrinsic value.	Reword policy to read:  “To provide for the protection of Invercargill’s outstanding landscapes and natural features, from those activities that could adversely affect their intrinsic value and identity <u>which includes</u> , <del>and</del> <u>their</u> associated vegetation and habitats.”  Clarify within the explanation to the policy what intrinsic value and identity includes.
<b>Environment Southland 18.58</b>	Policy 4 – Identification and Characterisation of Locally Significant Natural	The submitter notes that ‘Locally significant’ natural features and landscapes are not delineated on planning maps, as this policy suggests.	Identify second tier landscapes on planning maps.

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	Features and Landscapes		
<b>65.28 ICC Environmental and Planning Services</b>	Policy 4 – Identification and Characterisation of Locally Significant Natural Features and Landscapes	Support in part. The submitter considers that this policy is incorrectly states that the locally significant natural features and landscapes will be delineated on the Planning Maps. Most of these are shown on the Maps as reserves, but otherwise they are not identified for their characteristics as a landscape of local significance.	Either show these sites on the Planning Maps, or amend the policy.
<b>77.34 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 4 - Policy 4 – Identification and Characterisation of Locally Significant Natural Features and Landscapes	Support	Retain
<b>65.28 ICC Environmental and Planning Services</b>	Policy 6 - Protection for locally significant landscapes and townscapes and culturally significant landscapes and townscapes	Support in part. The submitter considers that this policy should be redrafted to combine the two sub-policies into one.	Join the two sub-policies into one by a linking sentence
<b>18.59 Environment Southland</b>	Policy 7 – Policies Specific to Otatara	Support	Retain
<b>77.35 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 7 – Policies Specific to Otatara	Support	Retain

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<b>SECTION 3.10 - RULES</b>			
<b>18.95 Environment Southland</b>	3.10.1	<p>The submitter considers that this rule will not meet the objectives of the plan as it could lead to adverse effects on outstanding natural features and landscapes.</p> <p>The submitter states that there is no guidance within the rule whether these performance standards are allowed once in the life time of the plan, once per year, once per activity.</p> <p>Further, the submitter notes that the rule does not require agriculture to meet performance standards. Agriculture means “the use of land or buildings for the rearing, breeding and keeping of animals...” The rule therefore allows sheds to house animals to be established on ridgelines, with no standards on size except for the 10m height zone rule.</p>	Strengthen performance standards to ensure there are no adverse effects on outstanding natural features and landscapes from land use.
<b>64.31 Department of Conservation</b>	3.10.1	<p>Oppose in part. The submitter considers that the rules enable agricultural activities within outstanding natural features and landscapes. The submitter is concerned about the broad definition of agricultural activities and the potential effects of these types of activities.</p> <p>The submitter is concerned that if these activities do not require resource consent through this rule that there is no trigger to consider effects of these activities on the coastal environment either.</p>	<p>Amend 3.10.1 to remove the exemption for agricultural activities from the performance standards in Rule 3.10.1 and that the standards are to be applied to all land uses. OR Amend the definition of agriculture to narrow the definition to activities typically understood as farming activities but not to include ancillary buildings or related earthworks.</p>
<b>87.49 Transpower NZ Ltd</b>	3.10.1	Support in part. The submitter seeks that the assessment matters are broadened to ensure that all relevant matters required by the NPSET are considered.	<p>(i) Amend Rule 3.10.1(c) as follows: ...  (C) Applications under Rule 3.10.1(B) above shall address the following matters which will be among those taken into account by the Council: .....</p>

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			<p><u>(g) Recognises the location and technical constraints of regionally significant infrastructure;</u></p> <p><u>(h) Consider the suitability of the site, and alternative sites or locations in order to minimise adverse effects.</u></p> <p><u>(i) Consider the benefits any proposed Network Utility may bring to the community.</u></p> <p><u>(i) Consider any special technical requirements and constraints of Network Utilities including those associated with their scale, location, design or operation.</u></p> <p>(ii) And any consequential amendments.</p>
<b>88.82 Federated Farmers</b>	3.10.1	Support. The submitter considers it would be unrealistic to seek to constrain rural activities that impact on landscapes and features.	Not stated.