

## 21. Subdivision

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	<b>General</b>		
<b>56.15 Jenny Campbell</b>	General	The submitter supports these sections, especially minimum lot sizes.	Not stated.
<b>64.32 Department of Conservation</b>	General	Support. The submitter considers these provisions to be consistent with Part 2 of the RMA, and it recognises the high values of some areas of the Invercargill city district. The submitter also notes that the provisions are consistent with the NZCPS2010 in retaining and enhancing public access to and along the coast and placing restrictions on subdivision in areas identified as being hazard prone	Retain objectives, policies, and rules
<b>117.7 Southern District Health Board</b>	General	The submitter believes that creating healthy homes environments is an important aspect of public health and believes appropriate insulation within housing design mitigates against potential noise nuisances while maintaining healthy room temperatures	Not stated
<b>115.1 New Zealand Historic Places Trust</b>	Various provisions 2.14.1(6), 2.14.2(4), 2.14.3(7) & (8), 3.18.4(L) & (N)	The submitter supports these provisions.  The submitter notes the Council's obligations under the RMA, in particular s6(f).  The submitter notes that in addition to the specific heritage provisions, the consideration of heritage values is embedded throughout the Plan.  The submitter considers the approach recognises that not all important heritage values are listed in the District Plan Heritage Record or covered by the heritage rules of the Plan. The submitter believes it is appropriate that the Council has the opportunity to consider effects on heritage values even where such values are not particularly identified for protection in Appendix II.	Adopt these provisions as they relate to heritage values:  2.14.1(6), 2.14.2(4), 2.14.3(7) & (8), 3.18.4(L) & (N)

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<b>2.14 SUBDIVISION – ISSUES, OBJECTIVES AND POLICIES</b>			
	<b>General</b>		
<b>105.4 ICC – Environmental Health and Compliance Services</b>	General	The submitter supports the issues, objectives, policies and methods of implementation	Support
	<b>Introduction</b>		
<b>18.78 Environment Southland</b>	Introduction	<p>The submitter believes the Introduction should recognise the existence of the “Big Picture” Spatial Plan in determining the way Invercargill “can realistically and sensibly be encouraged to develop and, in places, redevelop.”</p> <p>The submitter states that it is important that subdivision is guided by the strategic and visionary “Big Picture” and does not create an alternative ad hoc picture. Indeed the Big Picture document itself recognises the District Plan Review as a key project that assists with achieving the Council’s vision. As such the District Plan needs to recognise that it is part of a wider Council RMA process. Development of the city must be from the whole to the part, the “whole” being the Big Picture” with one of the “parts” being subdivision. Subdivision must reflect the over arching strategic direction set out in the Big Picture maps and District Plan Zone boundaries.</p> <p>The submitter points out that the proposed Plan only contains three references to the “Big Picture’ document, one in the Introductory Section 1.4 (which will be seldom consulted once the District Plan is in effect, and the others being in relation to zone boundaries. Given that subdivision is often involved in facilitating development that would otherwise not conform with the District Plan, the submitter believes that it is important the Big Picture is considered before allowing for such non conforming development. Otherwise there is a distinct danger of the “Big Picture”</p>	Inclusion of Objectives and Policies that recognise and give effect to “Invercargill: The Big Picture”, the non-statutory spatial plan prepared by the ICC in January 2012 following public consultation.

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		being undermined.	
<b>79.13 KiwiRail Holdings Ltd</b>	Introduction	Support. The submitter considers that it is important to protect significant transportation infrastructure	Retain paragraph 3 as proposed
	<b>2.14.1 Issues</b>		
<b>87.34 Transpower NZ Ltd</b>	Issues	Support in part. The submitter is concerned that there is no mention of the issue of effects <u>on</u> existing infrastructure, given that subdivision and development can be a major constraint on existing, and the provision of new infrastructure.	(i) That points 1, 4 and 7 are retained as notified (ii) Add an additional point to Issue 2.14.1 as follows: <u>“9. Subdivision and development can have adverse effects, including reverse sensitivity effects, on existing infrastructure and network utilities, which can result in restricting the operation, upgrading and development of infrastructure.”</u> (iii) And any consequential amendments.
<b>53.18 NZ Transport Agency</b>	Issue 1	Support.	Retain Issue 1 as proposed.
<b>79.14 KiwiRail Holdings Ltd</b>	Issue 1	Oppose in part. The submitter considers that the list should acknowledge that inappropriate subdivision may have adverse effects on the operation, maintenance and enhancement of significant infrastructure	Amend 2.14.1 Issue 1 by adding the following: <u>“Subdivision located adjacent to the land transport networks (including the railway network) needs to be adequately designed to avoid, remedy or mitigate reverse sensitivity effects such as noise and vibration”</u>
	<b>2.14.2 Objectives</b>		
<b>77.39 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Objectives 1-11	Support, particularly strong support of Objective 4	Retain
<b>78.6 Ministry of Education</b>	Objectives 1 and 5	Support in part. The submitter considers that these objectives provide an opportunity for future provision of schools or existing education facilities to be considered by developers	Amend by including reference to “education activities”
<b>53.19 NZ Transport Agency</b>	Objective 1	Support	Retain Objective 1 as proposed.

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<b>65.35 ICC Environmental and Planning Services</b>	Objective 1	Support subject to amendment of typo	Amend Objective 1 as follows: “Subdivision and development is promoted <del>that is</del> <u>to</u> integrate with existing communities, infrastructure and public spaces” Or “Subdivision and development <del>is promoted</del> <u>that is</u> integrates with existing communities, infrastructure and public spaces <u>is promoted.</u> ”
<b>88.8 Federated Farmers</b>	Objective 1	Support. The submitter encourages Council to fulfil this Objective through a suite of tools and planning approaches, including strategic use of development contributions to incentivise or recover the costs associated with development, rather than by placing unnecessary restrictions on landowners.	Adopt the Objective as proposed.
<b>88.9 Federated Farmers</b>	Objective 3	The submitter believes that while there should be an appropriate emphasis on considering the irreversible effects of losing high value soils from productive use and a need to protect areas important for primary production, this must be balanced against an individual’s right to manage their own property decisions, and council policies and planning should provide for managed growth in rural communities.	Delete the proposed objective.
<b>53.20 NZ Transport Agency</b>	Objective 5	Support.	Retain Objective 5 as proposed.
<b>87.35 Transpower NZ Ltd</b>	Objective 5	Support.	That Objective 5 be retained as notified
<b>88.10 Federated Farmers</b>	Objective 5	The submitter believes that the Plan should recognise and acknowledge that subdivision and development can be good for the District, particularly in rural areas where subdivision may occur for a number of reasons that do not have a significant additional impact on the District’s infrastructure.	Adopt the Objective as proposed, on the basis that the subsequent policies and rules sufficiently recognise the benefits that accrue to the District as a result of subdivision and development.
<b>91.13 PowerNet</b>	Objective 5	Support. The submitter considers it appropriate to protect existing	Retain Objective 5

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<b>Ltd</b>		infrastructure from new incompatible land uses and activities	
<b>53.21 NZ Transport Agency</b>	Objective 7	Support	Retain Objective 7 as proposed.
<b>53.22 NZ Transport Agency</b>	Objective 9	Support	Retain Objective 9 as proposed.
<b>102.8 Chorus NZ Ltd</b>	Objective 9	Strongly supports the need to integrate development with the provision of infrastructure	Retain Objective 9
<b>104.8 Telecom NZ Ltd</b>	Objective 9	Strongly supports the need to integrate development with the provision of infrastructure	Support
<b>87.36 Transpower NZ Ltd</b>	New Objective	The submitter considers there is no objective that seeks to manage the effects of subdivision and land use on the National Grid, other than infrastructure which exists at the time the proposed Plan is adopted (Policy 9).	(i) That a new objective be added as Objective 12 as follows: <u>“Manage the effects of subdivision and development on the safe, efficient and effective operation, maintenance, upgrading and development of the National Grid.”</u> (ii) And any consequential amendments.
<b>2.14.3 Policies</b>			
<b>78.7 Ministry of Education</b>	Policies	The submitter supports the policies, but suggests the addition of a new policy so that the location / or provision of education activities is recognised as a matter to be considered when planning a subdivision	Add additional policy: <u>“Policy X: To include the consideration of education activities when preparing applications for subdivision consent.”</u>
<b>53.23 NZ Transport Agency</b>	Policy 2 - Zoning	Support. The submitter’s task of planning infrastructure for the future is enhanced by development occurring as anticipated by the District Plan.	Retain Policy 2 as proposed.
<b>117.16 Southern District Health Board</b>	Policy 2 - Zoning	The submitter supports a buffer between residential and industrial zones as a way of mitigating adverse public health effects	Supports buffer between Residential and Industrial Zones
<b>117.15 Southern District Health</b>	Policy 3 – Urban Design	The submitter believes that in relation to public health, good urban design should also include factors such as effluent disposal, stormwater and	No decision specified

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<b>Board</b>		water source. Good urban design should also consider landscape and the ability for future buildings to capture passive solar heat.	
<b>53.24 NZ Transport Agency</b>	Policy 4 – Transportation Networks	Support.	Retain Policy 4 as proposed.
<b>88.11 Federated Farmers</b>	Policy 4 – Transportation Networks	The submitter strongly favours the use of site standards to address the potential risks identified and encourages Council to use the existing Development Contributions policies, or Financial Contributions to reflect any marginal cost imposed on the Council as a result of development or subdivision.	<ul style="list-style-type: none"> <li>• Adopt the Policy as proposed, using site standards to inform development and or subdivision.</li> <li>• Make use of Development or Financial Contributions to reflect any marginal costs resulting from development or subdivision, rather than attempting to deal with these issues through an inflexible planning approach.</li> </ul>
<b>88.12 Federated Farmers</b>	Policy 5 – Reticulated Services	Support.	Adopt the Policy as proposed.
<b>65.36 ICC Environmental and Planning Services</b>	Policy 6 Natural Hazards - Explanation	Support in part. The submitter considers that natural hazards should be considered at both the subdivision and land use stages. The explanation infers that they should only be considered at the time of subdivision.	<p>Amend Policy 6:  “Natural hazards are a constraint that should be considered at <u>both</u> the subdivision stage <u>and</u> , <del>rather than at</del> the building stage”  Or  “Natural hazards are a constraint that should be considered at the subdivision stage, <del>rather than at</del> <u>as well as at</u> the building stage.</p>
<b>77.41 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 6 Natural Hazards - Explanation	Support	Retain
<b>65.37 ICC Environmental and Planning Services</b>	Policy 7 Landscapes and Heritage	Support in part subject to amendment. The submitter notes that the RMA requires the “protection” of historic heritage values while the explanation incorrectly includes the term “preserve”. The submitter considers this is inconsistent with the other Proposed District Plan objectives, policies and methods.	Amend the explanation to Policy 7 “...Sites of significant landscape, known heritage sites and sites of cultural significance should be <del>preserved</del> <u>protected</u> where possible...”

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77.41 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 7 Landscapes and Heritage	Support	Retain
77.42 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 8 - Iwi	Support	Retain
53.25 NZ Transport Agency	Policy 9 – Infrastructure	Support.	Retain Policy 9 as proposed.
79.15 KiwiRail Holdings Ltd	Policy 9 – Infrastructure	Support. The submitter considers it appropriate to protect significant transport infrastructure	Retain Policy 9 as proposed.
87.37 Transpower NZ Ltd	Policy 9 – Infrastructure	Support in part. The submitter considers that the policy does not give effect to the NPSET in that it may not necessarily ensure that the operation, maintenance, upgrading, and development of the National Grid network is not compromised, and nor does it give consideration to the corridor management approach developed by Transpower as a means of addressing the statutory requirements and managing the effects of the network and the effects of other activities on the network.	<p>(i) Add the following policies:</p> <p><b><u>“Policy 10 National Grid Corridor:</u></b>  <u>When considering proposals for subdivision and development within the National Grid Corridor, the following will be taken into account:</u></p> <p>a. <u>The extent to which the proposal may restrict or inhibit the operation, access, maintenance or upgrading of National Grid transmission lines or support structures;</u></p> <p>b. <u>Any potential cumulative effects that may restrict the operation, access, maintenance, or upgrade of National Grid transmission lines or support structures; and</u></p> <p>c. <u>The nature of any proposal located near to an existing National Grid transmission line and the extent to which safe separation distances from the National Grid are maintained.</u></p> <p><b><u>Policy 10A National Grid Corridor:</u></b>  <u>To promote the design of subdivisions and land use development or redevelopment in a manner</u></p>

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			<p><u>that enables the efficient use of land within the identified National Grid Corridors without introducing sensitive activities or structures that would inhibit the operation, access, maintenance, or upgrade of National Grid transmission lines or support structures.</u></p> <p>(ii) And any consequential amendments.</p>
<b>91.14 PowerNet</b>	Policy 9 Infrastructure	Support. The submitter considers it appropriate to protect existing infrastructure from new incompatible land uses and activities	Retain Policy 9
<b>65.38 ICC Environmental and Planning Services</b>	Policy 10 Contaminated Land	Support in part subject to amendment. The submitter considers this Policy should be reworded to be consistent in terminology with the other policies in the Plan	Amend Policy 10 as follows: <del>“Subdivision design to have regard to any history of site contamination”</del> <u>To have regard to any history of site contamination as part of the subdivision process”</u>
<b>77.43 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 10 Contaminated Land	Support	Retain
<b>88.13 Federated Farmers</b>	Policy 10 – Contaminated Land	Support. The submitter considers addressing any concerns regarding land contamination at the time of subdivision or a change in land use is a more useful approach than mapping potentially contaminated land where there are no identified adverse effects arising from the current land use.	Adopt the Policy as proposed.
<b>77.44 Te Runaka o Waihopai and Te Runaka o Awarua</b>	Policy 11 – Public Access	Support	Retain
	<b>2.14.4 Methods of Implementation</b>		
<b>88.14 Federated Farmers</b>	Method 2	Support. The submitter favours the provision of advice rather than a “one size fits all” regulatory approach which can restrict legitimate and reasonable land use decisions.	Adopt the Method as proposed.
<b>69.13 ICC Roading Manager</b>	Method 5	The submitter considers that this clause is unclear in the way it is written and revision would ensure clarity of intent	Revise wording of Method 5



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<b>SECTION 3.18 - RULES</b>			
<b>70.2 ICC Water Services Manager</b>	General	The submitter considers that it is necessary to require that all new lots created by subdivision in residential areas are serviced with water supply, sewer disposal, stormwater disposal, telecommunications and power supply. The submitter considers that this will prevent any makeshift unnecessary easement solutions, and that it has been a historical expectation that new lots be serviced.	Require that all lots created by subdivision in residential areas are serviced
<b>53.79 NZ Transport Agency</b>	3.18.1	The submitter notes subdivision to provide for a network utility is a controlled activity, but that Rule 3.9.2 exempts the operation, maintenance, upgrading and replacement of existing infrastructure from the other rules and standards of the Plan. Network utilities are a sub set of infrastructure, and as a result, the submitter considers that it is not clear how these provisions will operate in tandem.	Clarify the operation of Rules 3.9.2 and 3.18.1.
<b>102.17 Chorus NZ Ltd</b>	3.18.1	Support on the grounds that the controlled activity status is appropriate for subdivision to provide for utility lots	Retain
<b>104.16 Telecom NZ Ltd</b>	3.18.1	Support on the grounds that the controlled activity status is appropriate for subdivision to provide for utility lots	Retain
<b>79.29 KiwiRail Holdings Ltd</b>	3.18.3	Support. The submitter considers that it is important that the significant transport infrastructure is protected from inappropriate subdivision, use and development	Retain 3.18.3
<b>88.90 Federated Farmers</b>	3.18.3 and 3.18.4	<p>Oppose in part. The submitter believes that the rule does nothing to provide the reader or sub-divider with any confidence that a well managed or reasonable subdivision proposal will clear the multiple hurdles this Rule sets out, and there is potential that there will be standards set that are capricious, not effects based, and which are inconsistent with more robust environmental policies set at the regional level. The submitter considers that where Council are seeking to address specific environmental impacts these should be specifically mentioned, and should not seek to replicate or differ from any relevant rules developed by Southland Regional Council.</p> <p>The submitter does not believe Council's decision making on particular subdivision consent applications should include the productive capacity of the district's soils.</p>	<ul style="list-style-type: none"> <li>• Delete proposed Rule 3.18.4 (C) "Potential effects on the environment of land uses enabled by the subdivision".</li> <li>• Delete proposed Rule 3.18.4 (D) "The extent to which the subdivision enables land uses which will maintain the life supporting capacity and productivity of the district's soils".</li> <li>• Delete proposed Rule 3.18.4 (I) "Protection of waterways from damage by stock".</li> </ul>

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		<p>The submitter is particularly concerned with the way the Rule restricts the flexibility for land users to make legitimate land use decisions for the property they own and maintain, particularly in the Rural Zone.</p> <p>The submitter considers the protection of waterways from stock is a Southland Regional Council function and do not believe this is a factor that Council should have any discretion over.</p> <p>The submitter does not believe it is the subdivider's responsibility to develop a subdivision plan that enables any permitted land use activities in the relevant zone and considers it is a very high hurdle to expect that a subdivision proposal may consider and account for other potential land uses. As an alternative the submitter asks that Council specify the relevant permitted activities subdivision should seek to enable subdivision in each zone.</p>	<ul style="list-style-type: none"> <li>Delete proposed Rule 3.18.4 (Q) "The extent to which the proposed subdivision enables uses permitted in the zone".</li> </ul>
<b>78.8 Ministry of Education</b>	3.18.4	Support in part. The submitter considers that the matters over which Council reserves discretion should also include consideration of education facilities	Amend by including the following: <u>"Integration with and effects on education activities"</u>
<b>79.26 KiwiRail Holdings Ltd</b>	3.18.4	The submitter suggests a new matter be included addressing reverse sensitivity effects, particularly noise and vibration effects	Add a new matter: <u>"The size, shape and arrangement of allotments and how this achieves the setbacks and will enable the development to address reverse sensitivity noise and vibration effects from adjacent or nearby land transport networks"</u>
<b>67.7 ICC Drainage Manager</b>	3.18.4(H)	The submitter considers the provision is unclear as to the control of stormwater	Amend 3.18.4(H)by: Deleting 3.18.4(H)(a)(5) AND Amending 3.18.4(H)(b)(3) as follows: "The incorporation of low impact stormwater design features where appropriate, and in accordance with the Code of Land Development to limit peak stormwater flows, reduce stormwater contamination and avoid adverse effects to other properties"

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18.101 Environment Southland	3.18.4 (I), (P) and (T)	Support	Retain
53.80 NZ Transport Agency	3.18.4(J)	Support. The submitter considers that NZTA is best placed to determine the potential transportation effect of resultant land uses, particularly on State Highways, and seek that affected party status be identified in the Plan.	Amend Rule 3.18.4 by inserting an additional matter, as follows: “(U) Whether the written approval of the NZ Transport Agency has been obtained.”
79.31 KiwiRail Holdings Ltd	3.18.4 (K)	Support. Support. The submitter considers that it is important that the significant transport infrastructure is protected from inappropriate subdivision, use and development	Retain 3.18.4 (K)
87.54 Transpower NZ Ltd	3.18.5	Support in part. The submitter seeks to introduce additional wording to ensure that applications for subdivision identify building platforms outside of the National Grid Yard, and that the reference to a 32 metre corridor is removed as the width of setback depends upon the voltage and type of support structure of the line. The submitter would also like to strengthen the assessment matters to ensure robust assessment of applications to protect the National Grid.	<p>(i) That Rule 3.18.5 be amended as follows:  <b>“3.18.5 Electricity Transmission Lines National Grid Corridor</b>  Where subdivision <del>of</del> <u>includes</u> land <del>(in any zone)</del> <u>within the National Grid Corridor creates new boundaries within an area measured 32 metres from either side of the centre line of an electrical transmission line designed to operate at or above 110kV, all allotments shall identify a building platform for the principal dwelling or building, to be located outside the National Grid Yard.</u></p> <p>‡The following matters will be taken into account by the Council in exercising its discretion.  (A) <del>The extent to which the subdivision design avoids, remedies or mitigates conflicts with existing lines, for example through the location and design of roads, reserves, landscaping, earthworks and building platforms.</del>  (B) <del>The ability for maintenance and inspection of transmission lines including ensuring access.</del>  (C) <del>The ability to provide a complying building platform.</del></p>

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			<p><del>(D) Compliance with the NZ Electrical Code of Practice for Electrical Safe Distances.</del></p> <p><del>(E) Whether any affected utility operator has provided written approval.</del></p> <p><u>(A) The extent to which the design and construction of any subdivision allows for earthworks, buildings and structures to comply with the safe separation distance requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP: 34 2001).</u></p> <p><u>(B) The extent to which the subdivision or subsequent building design mitigates the effects of the lines and the risk of potential injury and/or damage to property e.g. through the location of roads and reserves under the route of the line.</u></p> <p><u>(C) The ability for continued access to existing National Grid lines for maintenance, inspections and upgrading.</u></p> <p><u>(D) The extent to which potential adverse effects (including visual) are mitigated through the location of building platforms.</u></p> <p><u>(E) The extent to which the design and construction of the subdivision allows for activities to be set back from National Gridlines to ensure adverse effects on and from the National Grid and on public safety are appropriately avoided, remedied, or mitigated.</u></p> <p><u>(F) The nature and location of any proposed vegetation to be planted in the vicinity of National Grid lines</u></p> <p><u>(G) The provision for the on-going operation.</u></p>

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			<p><u>maintenance and planned upgrade of National Grid lines.</u></p> <p><u>(H) The risk to the structural integrity of the National Grid transmission network; and</u></p> <p><u>(I) The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity on and amenity and nuisance effects of the National Grid.</u></p> <p><b><u>3.18.6</u></b>  <u>Any subdivision of land in any zone within the National Grid Corridor which does not comply with the restricted discretionary activity standard under Rule 3.18.5 is a Non-Complying Activity.</u></p> <p><u>Applications under Rules 3.18.6 above shall address the following matters, which will be among those taken into account by Council:</u></p> <p><u>(A) The extent to which the design and construction of any subdivision allows for earthworks, buildings and structures to comply with the safe separation distance requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP: 34 2001).</u></p> <p><u>(B) The extent to which the subdivision or subsequent building design mitigates the effects of the lines and the risk of potential injury and/or damage to property e.g. through the location of roads and reserves under the route of the line.</u></p> <p><u>(C) The ability for continued access to existing National Grid lines for maintenance, inspections and upgrading.</u></p>

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			<p>(D) <u>The extent to which potential adverse effects (including visual) are mitigated through the location of building platforms.</u></p> <p>(E) <u>The extent to which the design and construction of the subdivision allows for activities to be set back from the National Grid to ensure adverse effects on and from the National Grid and on public safety are appropriately avoided, remedied, or mitigated.</u></p> <p>(F) <u>The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid.</u></p> <p>(G) <u>The provision for the on-going operation, maintenance and planned upgrade of the National Grid.</u></p> <p>(H) <u>The risk to the structural integrity of the National Grid; and</u></p> <p>(I) <u>The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity on and amenity and nuisance effects of the National Grid.</u></p> <p><b><u>Non-notification:</u></b>  <u>Where an activity requires resource consent because it is within the National Grid Corridor then the application need not be publicly notified and need not be served on any affected party apart from Transpower New Zealand Limited who will be considered an affected party.</u>  <u>Note: Vegetation to be planted around the National Grid should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.</u>  <u>Note: The New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34: 2001) contains</u></p>

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			<u>restrictions on the location of structures and activities in relation to the lines. Compliance with the permitted activity standards of the Plan does not ensure compliance with the Code of Practice.”</u> (ii) And any consequential amendments.
<b>88.91 Federated Farmers</b>	3.18.5	<p>Support in part. The submitter considers that given the NZ Electrical Code of Practice for Electrical Safe Distances (NZECP) in 3.18.5 (D) (and the Electricity Act 1992) is sufficient to protect the safety of structures and people in the vicinity, we consider that reference to the NZECP is the only part of this Rule that Council need retain, and proposed Rule 3.18.5 (A) is unnecessary, over and above reference to the NZECP.</p> <p>The submitter also believes that Rule 3.18.5 (B) should be deleted and the onus should be on the transmission line owner to liaise and communicate with the landowners housing their assets as and when needed, rather than these landowners being further encumbered through District Plan rules restricting subdivision.</p>	<ul style="list-style-type: none"> <li>• Delete proposed Rule 3.18.5 (A): “The extent to which the subdivision design avoids, remedies or mitigates conflicts with existing lines, for example through the location and design of roads, reserves, landscaping, earthworks and building platforms”.</li> <li>• Delete proposed Rule 3.18.5 (B) “The ability for maintenance and inspection of transmission lines including ensuring access”.</li> <li>• Rule 3.18.5 (C) is retained.</li> <li>• Rule 3.18.5 (D) is retained.</li> </ul>
<b>88.92 Federated Farmers</b>	3.18.6	<p>Oppose in part. The submitter would like to see greater flexibility around the minimum lot size in both the Rural 1 and Rural 2 zones, ideally occur through site standards against which each consent could be considered on its individual merits, particularly given the wide range of factors Council is seeking to consider.</p> <p>The submitter considers it is also important that the District Plan recognises that unnecessary constraints on otherwise appropriate subdivision can also result in adverse effects, and that the economic and social drivers for subdivision differ between farming operations, and often require different treatment.</p> <p>The submitter believes that If the proposed minimum lot size of four hectares was reduced to two hectares in the Rural 1 Zone, there would be consistency of rules between the two Rural Zones, and there would be</p>	<p>Option 1: Remove any reference to minimum Lot sizes for subdivision in the Rural Zones.</p> <p>Option 2: Retain the two hectare minimum lot size for the Rural 2 Zone, and reduce the minimum lot size for the Rural 1 Zone from four hectares to two hectares as follows:</p> <p>“(K) Within the Rural 1 Zone: Allotments of less than <del>four</del> <u>two</u> hectares.”</p>

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		greater flexibility for land use decisions in the Rural 1 Zone while still allowing consideration of a number of issues relevant to subdivision, through the discretionary activity Rules 3.18.3 and 3.18.4.	
<b>18.102 Environment Southland</b>	3.18.6 (A) and (B)	Support	Retain
<b>32.2 R T Chapman</b>	3.18.6 (K)	<p>The submitter opposes the minimum lot size in the Rural 1 Zone of 4 ha.</p> <p>While the submitter acknowledges that a restriction on further subdivision of larger allotments (i.e. greater than 4ha) may be desirable in achieving the objectives of preserving the productivity of rural land, the submitter considers that the proposed restrictions on existing 4 ha allotments will not achieve that.</p> <p>The submitter believes that it is unrealistic to expect that existing 4 ha allotments will be aggregated into larger rural block for rural activities.</p> <p>The submitter considers that further subdivision of 4ha allotments down to 2 ha will create an additional allotment for residential development as a lifestyle block with the productive value of the land being maintained, and this would represent a sustainable use of this land.</p> <p>The submitter states that there is no evidence that there are any problems with modern onsite wastewater disposal systems on 2 ha allotments, and 2ha allotments will not create demands for extension to or upgrades of infrastructure.</p>	<p>Delete Rule 3.18.6 (K) and substitute either of the following:</p> <p>“Within the Rural 1 Zone: Allotments less than four hectares unless the allotment being subdivided is five hectares or less in which case the threshold for a non-complying activity shall be two hectares”</p> <p>Or alternatively</p> <p>“Within the Rural 1 Zone allotments of less than two hectares”</p>
<b>47.2 Graham Dick</b>	3.18.6 (K)	<p>The submitter opposes the minimum lot size in the Rural 1 Zone of 4 ha and considers the increase from the one residence per 2 ha under the Operative District Plan is not logical and doesn't promote sustainable management.</p> <p>The submitter states that modern septic tank systems are efficient,</p>	<p>Delete Rule 3.18.6 (K) and replace with the following:</p> <p>“Within the Rural 1 Zone allotments of less than two hectares”</p>



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		<p>environmentally friendly and do not require 4 ha as an effluent field, and there is no evidence that there are any problems with onsite wastewater on 2 ha allotments, and 2ha allotments.</p> <p>The submitter considers that Invercargill is extremely well serviced and there will be no demand for extensions or upgrades of infrastructure.</p> <p>The submitter states that the vast majority of the Rural 1 area already consists of small lifestyle blocks of 2 ha, 4ha and larger, and as such have not resulted in any reduction in traditional forms of agriculture or horticulture. The submitter believes the creation of 4 ha blocks would not result in a reduction in the traditional forms of agriculture.</p> <p>The submitter considers that maintenance of the existing 2 ha criteria as a lifestyle block is the most appropriate, productive and sustainable use of this land.</p>	
<b>58.7 Donald Moir</b>	3.18.6	<p>The submitter opposes the minimum allotment size of 4 ha in the Rural 1 Zone. The submitter refutes the contention that domestic wastewater systems will perform better on the larger area, or that there will be fewer of them in total.</p> <p>The submitter considers that it is impractical to try and control development in those areas that are already rural-residential in nature.</p>	Give further consideration to the Rural 1 Zone. The zone boundaries should be modified or the minimum allotment size should be set at 2 ha as is presently the case.
<b>103.66 Invercargill Airport Ltd</b>	3.18.6	<p>Oppose / Support in part.</p> <p>The submitter considers that to limit the number of people exposed to high levels of aircraft noise the minimum lot size rules within the Outer Control Boundary (OCB) and the Single Event Sound Exposure Boundary (SESEB) should be more stringent.</p> <p>The submitter also believes that the minimum 15ha lot size in the Airport Protection Zone should be retained from the operative District Plan</p>	<p>Amend 3.18.6(f) to prohibit the creation of allotments in the Outer Control Boundary (OCB) and the Single Event Sound Exposure Boundary (SESEB) less than 1ha in Otatara and 500m2 in the Residential 1 Zone.</p> <p>Insert a minimum 15ha lot size for the Airport Protection Zone.</p>
<b>18.103</b>	3.18.7	Support	Retain

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Environment Southland			
<b>RURAL 1 – LOT SIZE</b>			
<b>6.1 Van Uden</b>	No specific provision referred to in submission	<p>Opposes the introduction of a 4ha minimum lot size in the Rural 1 zone.</p> <p>Disagrees with the implication that 2ha is not enough to support on-site effluent systems. States that there are systems in existence on quarter acre sites that work with no adverse effects.</p> <p>Believes that the proposed 4ha minimum lot size in the rural zone would stagnate rural development.</p> <p>States that people wanting lifestyle blocks sometimes find 4ha too large to manage and do not want the work associated with them, yet want to live in a rural area. The proposed lot size rule would take away peoples' choice.</p>	<p>Not stated.</p> <p>Would like Council to consult with the community.</p>
<b>10.1 Aleisha Henderson</b>	No specific provision referred to	<p>Opposes the introduction of a 4ha minimum lot size in the Rural 1 Zone.</p> <p>The submitter would like to purchase a block of land but believes that she would not be able to afford a 4ha section or manage that much land. The submitter asserts that people only want 2ha to live on.</p> <p>The submitter believes that 2ha blocks are not hard on the City's drainage systems.</p> <p>The submitter cannot see a logical reason for the change, especially in areas, such as Myross Bush, where the lots are already 2ha.</p>	Retain the residential density provisions as per the operative District Plan
<b>12.1 Ian and Colleen Smith</b>	No specific provision referred to	<p>Opposes the introduction of a 4ha minimum lot size in the Rural 1 zone.</p> <p>The submitter purchased 4ha of rural land as an investment and a great place to raise a family. They believe the 4ha lot size would not enable them to realise the financial gain that they had envisaged. The submitter believes that this is not only bad timing for them, but also unfair as they are one of the few properties over 4ha in the area.</p>	Retain the residential density provisions for their area as per the Operative District Plan

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		The submitter asserts that the proposed activity status for subdividing below 4ha would devalue their property	
<b>17.1 Rex &amp; Ann-Marie Miller</b>	No specific provision referred to	<p>Oppose.</p> <p>The submitter states that they had planned to subdivide for their retirement and feel that Council should not be doing a U-turn and stopping this from happening.</p> <p>The submitter states that Myross Bush is heavily subdivided already and their property is surrounded by mostly 2ha blocks. They believe that it is too late to change land use now and any further subdivision will not have an impact on the area.</p> <p>The submitter believes that there is no problem with waste/sewage disposal. They believe that a 2ha block is capable of dealing with one house load of waste disposal.</p> <p>The submitter considers that a 4ha block is uneconomic as a farm so there is no use trying to retain farming as an option. The market in the submitter's area is only for 2ha blocks for people moving out from the city who want extra room but do not have the knowledge or the resources to manage 4ha.</p>	That the 2ha minimum lot size be retained for lifestyle areas of Invercargill that are already heavily subdivided and have established amenities e.g. school, community hall.
<b>73.1 John Beaufill</b>	No specific provision referred to	<p>Oppose. The submitter opposes the proposed 4ha minimum lot size in the Rural 1 Zone, in preference to 2ha.</p> <p>The submitter believes that effluent disposal fields can be designed for 2ha, that requiring larger blocks of land will hasten urban sprawl, that people only want 2ha or less, that more land will be required for residential development, and that people can get privacy on 2ha</p>	That the minimum lot size be amended to 2ha.
<b>119.1 Philip Brough</b>	No specific provision referred to	Oppose. The submitter agrees with the concept of preserving open space and landscapes but considers a blanket 4ha lot size will be detrimental to the general local economy and contrasts with property demand.	Not stated

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		<p>The submitter believes that the Plan should be more proactive in enabling subdivision less than 2ha, where the on-site waste water disposal systems can be designed to suit the soils by making this a discretionary activity.</p> <p>The submitter believes that the minimum 4ha lot size will put more pressure on Otatara, which allows for more intense residential density.</p>	