



# Federated Farmers of New Zealand

Submission to Clutha District Council on 2017 Zoning Review

11 December 2017

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## Submission to Clutha District Council on the 2017 Zoning Review

To: Clutha District Council

Name of submitter: Federated Farmers of New Zealand

Contact person: David Cooper  
Senior Policy Advisor  
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Address for service: PO Box 5242  
Dunedin 9054

This is a submission to Clutha District Council on the 2017 Zoning Review.

## **Summary of Submissions**

### Introduction

Federated Farmers appreciates the opportunity to submit to supports Clutha's Zoning Review.

We have no position on where Council is proposing to rezone land to Urban, Transitional or Industrial Resource Areas, as we consider the impacts will provide both positive opportunities for many, including the broader District, while creating potential for some issues bordering the newly rezoned areas.

We support the submissions of individual farmers in relation to the areas proposed for rezoning.

### Specific submissions

Federated Farmers generally supports Clutha District Council's zone based approach to District Planning.

However, we underline the continuing significant importance of primary production to the District, both in direct and indirect terms, and in relation to economic and other benefits.

We recognise the marginal benefits of development of rural land for alternative purposes, *where this is justified by demand for these land uses.*

However, it is also important that the provisions associated with land use in the rural areas recognise the need for primary production to be relatively unencumbered.

In particular, we ask that Council consider the potential reverse sensitivity issues likely to arise from the zoning review, and how these may impact primary production activities.

## 1.1 Introduction

- 1.2 Federated Farmers of New Zealand (Inc.) is a voluntary, primary sector organisation representing farming members and their families. Federated Farmers has a long history of representing the needs and interests of New Zealand farming communities, primary producers and agricultural exporters.
- 1.3 The Federation aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which our members may operate their business in a fair, flexible and sustainable manner. Our members strongly support a regional planning approach that recognises landowners play a principle role as managers and users of the region's natural and physical resources.
- 1.4 The 2017 Zoning Review aims to propose areas of land in and around towns in the Clutha District that could be rezoned to Urban, Transitional or Industrial Resource Areas.
- 1.5 Federated Farmers has no position on where Council is proposing to rezone land to Urban, Transitional or Industrial Resource Areas. The proposed rezoning will impact some farmers in a positive sense, and others may be adversely impacted. We support the submissions of individual farmers in respect to the areas proposed.
- 1.6 Our purpose in submitting to this process is threefold:
1. To support Council's overall zoning approach;
  2. Ensuring appropriate recognition of the benefits of the Rural area, both economic and non-economic;
  3. Ensuring farmer concerns in respect to reverse sensitivity are sufficiently considered in future amendments to the District Plan.

### **Summary:**

**Federated Farmers appreciates the opportunity to submit to supports Clutha's Zoning Review.**

**We have no position on where Council is proposing to rezone land to Urban, Transitional or Industrial Resource Areas, as we consider the impacts will provide both positive opportunities for many, including the broader District, while creating potential for some issues bordering the newly rezoned areas.**

**We support the submissions of individual farmers in relation to the areas proposed for rezoning.**

## 2.1 Specific submissions

- 2.2 Federated Farmers' views on zoning and development of rural land for alternative uses are informed by a broad range of factors. In many respects these factors require some balance.
- 2.3 The importance of primary production to the District - At the macro level, we are keen to ensure that the positive contribution of the rural areas of the District and primary production more generally are appropriately recognised through the District Plan. This includes recognition of

the issues that newly rezoned land may have on existing rural uses, particularly through potential reverse sensitivity. We are also keen to ensure that the positive contribution of primary production, beyond the direct economic impact of primary production activities, are also recognised.

- 2.4 As recognised in the 2015 Clutha District Economic Development Strategy, <sup>1</sup> Primary Production *directly accounts for 44.4 percent of the District's GDP*. Because Clutha District is a predominantly rural district, primary production will also indirectly account for a significant yet unquantified proportion of the Manufacturing, Construction, Wholesale & Distribution, Retail Trade & Services and Business Services across the District.
- 2.5 While this reliance is co-dependent (ie, profitable farming will rely to a large extent on the proximity and availability of these services), this relationship is nonetheless important, and very significant. This economic contribution is enabled through the availability of land for primary production, and by ensuring primary production activities can take place in a reasonable regulatory environment.
- 2.6 It is also important for the District Plan to recognise the contribution farming and primary production makes to the District's valued landscapes and natural areas, in addition to the overall economic contribution. However, this contribution is again underpinned by the economic viability of the District's farming operations. This economic viability is underpinned in turn by the ability for landowners to make reasonable land use decisions which enable sustainable economic use of the land.
- 2.7 The costs of zoning for individual farmers – It should be recognised that zone based rules imposes some costs on landowners in the rural area. This occurs because, by defining areas that are appropriate for residential, industrial or commercial development, Council effectively defines areas where such development is not appropriate. This in turn creates opportunity costs for specific landowners.
- 2.8 Zoning for land use is an appropriate approach for Clutha District - However, from a broad view the zoning approach represents the most appropriate approach for Clutha District, coupled with reasonable flexibility around land use decisions in rural areas.
- 2.9 Inappropriate or fragmented non-rural development can impose significant economic infrastructure development and maintenance costs to the Council and ultimately the ratepayer. These costs may include both 'negative externalities', where the marginal costs imposed on the infrastructure network or infrastructure users by those connecting to the network are not sufficiently met by the new connection. These costs can also include 'opportunity costs' where inefficient development or use of public infrastructure networks result from suboptimal planning.
- 2.10 A zoning approach also ensures that costs and adverse impacts on primary production through potential reverse sensitivity issues can also be sufficiently addressed.

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<sup>1</sup> Key Clutha District Industry Sectors by GDP 2013, page 4. Available at <http://www.cluthadc.govt.nz/publications/strategies/Documents/Economic%20Development%20Strategy%20-%20PDF%20of%20A91908.pdf>.



- 2.11 We agree with the overall zoning approach and the focus on developing specific rules for each zone, with specific provisions used within each zone to define what is or is not appropriate development for that zone. As a rule, we broadly agree with the overall purpose and the majority of objectives proposed for each zone.
- 2.12 The NPS on Urban Development Capacity - Federated Farmers recognises there is a need to ensure there is sufficient land for residential development, now and for the future, as a result of the NPS on Urban Development Capacity. We consider the proposed zoning review meets these requirements.
- 2.13 We also consider the report commissioned for the zoning review, "Clutha District Council assessment of proposed rezoning", undertaken by Rationale Ltd, underlines the marginal benefits of development of rural land for alternative purposes, *where this is justified by demand for these land uses*.
- 2.14 It is important that primary production activities in the rural areas remain relatively unencumbered - However, it is also important that Council recognise there is finite supply of land for primary production. It is important that the provisions associated with land use in the rural areas recognise the need for this land use to be relatively unencumbered. We ask that Council review the potential implications of the proposed re-zoning, particularly with an eye to ensuring any potential reverse sensitivity issues are addressed for primary production activities.

**Summary:**

**Federated Farmers generally supports Clutha District Council's zone based approach to District Planning.**

**However, we underline the continuing significant importance of primary production to the District, both in direct and indirect terms, and in relation to economic and other benefits.**

**We recognise the marginal benefits of development of rural land for alternative purposes, *where this is justified by demand for these land uses*.**

**However, it is also important that the provisions associated with land use in the rural areas recognise the need for primary production to be relatively unencumbered.**

**In particular, we ask that Council consider the potential reverse sensitivity issues likely to arise from the zoning review, and how these may impact primary production activities.**

**Submission on Publicly Notified Proposal for Change to Plan**  
*Clause 6 of Schedule 1, Resource Management Act 1991*

To: CLUTHA DISTRICT COUNCIL

Name of Submitter: Tom Hollows - Hollows Timber Co Ltd  
(full name)

This is a submission on the following proposed change to the Clutha District Plan:

- Plan Change 39 – Balclutha Re-zoning**
- Plan Change 40 – Stirling Re-zoning**
- Plan Change 41 – Milton Re-zoning**
- [delete any you are not submitting on]*

I could / could not\* gain an advantage in trade competition through this submission.  
(\*Select one)

\*I am / am not # directly affected by an effect of the subject matter of the submission that –  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.

\*Delete entire paragraph if you could not gain an advantage in trade competition through this submission.  
#Select one

The specific provisions of the proposal that my submission relates to are *[give details]*:

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My submission is:

*[include –*

- *Whether you support or oppose the specific provisions or wish to have them amended; and*
- *Reasons for your views].*

Regarding the area at our mill site, if  
our business is to expand in the future we  
will be looking for more land on or  
nearby our boundary that would need to  
be zoned industrial. I would like this  
to be noted.

I seek the following decision from the local authority:  
*[give precise details]*

I would like some feedback regarding the ability to extend our boundary in the future with the new area being zoned industrial.

I wish / do not wish to be heard in support of my submission. *[select one]*

If others make a similar submission, I will consider presenting a joint case with them at a hearing.  
*[delete if you would not consider presenting a joint case]*

  
Signature of submitter  
*(or person authorised to sign on behalf of submitter)*

16/11/17  
Date  
*(A signature is not required if you make your submission electronically)*

Address for service of submitter:

Telephone: 03 4182594

Fax/email: tom@hollowstimber.co.nz

Contact person: *[name and designation, if applicable]*

Tom Hollows  
Manager of Hollows Timber Co Ltd.





11 December 2017

Clutha District Council  
PO Box 25  
**BALCLUTHA 9240**

**By email to:** [planning@cluthadc.govt.nz](mailto:planning@cluthadc.govt.nz)

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN, CHANGE OR  
VARIATION (FORM 5)  
Plan Change 39: Balclutha; Plan Change 40: Stirling; Plan Change 41: Milton**

**NAME OF SUBMITTER:**

KiwiRail Holdings Limited (KiwiRail)

**ADDRESS FOR SERVICE:**

Level 1  
Wellington Railway Station  
Bunny Street  
PO Box 593  
**WELLINGTON 6140**

Attention: Rebecca Beals

Ph: 04 498 3389

Email: [Rebecca.Beals@kiwirail.co.nz](mailto:Rebecca.Beals@kiwirail.co.nz)

**KiwiRail Submissions on Proposed District Plan Changes**

KiwiRail Holdings Limited (KiwiRail) is the State Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail Holdings Limited is also the Requiring Authority for land designated "Railway Purposes" (or similar) in District Plans throughout New Zealand.

The designated corridors of the Main South Line (MSL) and the Finegand Branch pass through the district and are all a key part of the KiwiRail network. The MSL is near the Plan Change areas that are the subject of this submission. KiwiRail seeks to protect its ability to operate, maintain and upgrade this line into the future.

To achieve this, KiwiRail encourages land uses near the railway corridor that do not compromise the short or long term ability to operate a safe and efficient rail network, both day and night. Where sensitive activities are proposed on land near the railway corridors, appropriate controls should be imposed to ensure their long term amenity. Associated with

that is the risk of objections and complaints leading to restraints on the operation, maintenance and enhancement of the rail corridor. Safety is a key concern for KiwiRail so ensuring sightlines and level crossings are protected is also paramount.

KiwiRail's submissions on the Proposed Plan Change are set out in the attached table. Insertions we wish to make are marked in **bold** and **underlined**, while recommended deletions are shown as ~~struck-out~~ text. All requested changes include any consequential changes to the Plan to accommodate the requested change in the stated, or alternate, location. The submissions relate to all aspects of the Proposed Plan Changes.

KiwiRail wishes to speak to our submission and will consider presenting a joint case at the hearing with other parties who have a similar submission. KiwiRail could not gain an advantage in trade competition through this submission.

KiwiRail are happy to discuss these submission points should Council have any queries.

Regards

A handwritten signature in blue ink, appearing to read 'Rebecca Beals', with a stylized flourish at the end.

Rebecca Beals  
**RMA Team Leader**  
**KiwiRail**

Submission Number	Proposed Amendment	Support/Oppose/Seek Amendment	Submission/Comments/Reasons	Relief Sought (as stated or similar to achieve the requested relief)
1.	Plan Change 39: Balclutha Zoning Planning Maps	Support	<p>There are three areas shown on the map accompanying the Plan Change where the sites either adjoin or are in close proximity to the rail corridor.</p> <p>One of these is proposed to change to Industrial Resource Area and a second is proposed to change to Transitional Resource Area. These specific areas are on Planning Map 29 (Kakapuaka), Planning Map 5 (Balclutha East).</p> <p>The third site is identified in the Section 32 Report as having the designation extent amended to be only over Lot 3 DP 377704. KiwiRail support correction of the mapping, noting that this is adjacent to the designated rail corridor, not a secondary designation on top of the existing rail designation.</p> <p>The change in zoning to Industrial Resource Area is not proposed to change the provisions within the Zone Rules themselves under this Plan Change. The zoning change does not give rise to any rights in relation to crossing the rail corridor, nor does it seek to generate what are likely to be noise sensitive activities from locating adjacent to the corridor.</p>	Retain as notified.
<b>Plan Change 40: Stirling Zoning Planning Maps</b>				
2.		Support	KiwiRail have no opposition to the rezoning of the site in proximity to the rail network as Industrial Resource Area, as mapped on U47.	Retain as notified.
3.		Support	The creation of the Proposed Noise Control Boundary associated with the Stirling Dairy Manufacturing Site passes over the rail corridor in Stirling. Managing reverse sensitivity is supported by KiwiRail as this is also an issue that the rail network is subject to and seeks to protect itself from.	Retain as notified.
4.	Section 3.13 – Noise Rule NSE.1 Noise Measurement (i)	Support	KiwiRail support the updating of the reference to the latest NZ Standards documents in relation to the measurement and assessment of acoustics.	Retain as notified.
5.	Section 4.1 – Rural Resource Area Objective RRA.7 and Policy RRA.13	Support	<p>KiwiRail support the specific recognition through the objective and policy of the issue of reverse sensitivity, and the Council's clear direction to ensure that noise sensitive activities are located and/or designed so to not be affected by existing activities.</p> <p>This is an issue for KiwiRail also as a network utility operator that has the potential to be subject to reverse sensitivity issues, and the wording of the provisions as notified provides support the consideration of such effects irrespective of the specific existing activity.</p>	Retain as notified.
<b>Plan Change 41: Milton Zoning Planning Maps</b>				
6.		Support	As with Plan Change 39 and 40, there are areas of land adjacent to the rail corridor that are proposed to be rezoned as Industrial Resource Area, as mapped on maps H45B and H45D. These zone changes are not opposed.	Retain as notified.
7.	Section 4.3.3 – Industrial Resource Area Objective IND.3	Support	KiwiRail support that the objective proposed seeks to ensure that development of this area is co-ordinated and adequately serviced, however in particular the requirement to integrate with adjoining infrastructure and to	Retain as notified.

Submission Number	Proposed Amendment	Support/Oppose/Seek Amendment	Submission/Comments/Reasons	Relief Sought (as stated or similar to achieve the requested relief)
8.	Policy IND.5	Support	<p>not compromise existing drainage systems are important to KiwiRail.</p> <p>The site adjoins the rail and therefore KiwiRail seek to ensure that the opportunity for a siding to connect the industrial area with the rail corridor for the movement of freight is enabled. Further, ensuring drainage is adequately managed ensures that development of the site does not have the potential to result in the rail track being undermined or overtopped as a result of drainage issues, both leading to potentially unsafe situations.</p> <p>KiwiRail support that the development of this area is managed through a Structure Plan approach.</p> <p>The requirement at (d) of the Policy to include safe and efficient connections with adjoining infrastructure, and the specific mention of the Main South Line is supported by KiwiRail. KiwiRail support recognising the potential for a siding between the rail corridor and this Industrial Resource Area in the structure plan in the event that this is required once development of the site proceeds, seeking to ensure the effective and efficient movement of freight in and out of the area is facilitated.</p>	Retain as notified.
9.	Rule IND.5.2	Support	<p>KiwiRail support the Rule proposed and the specific requirement for any Structure Plan for the development of the site to include the provision of rail sidings and the need to manage rail crossings if considered necessary. Further, KiwiRail support the specific comment that consultation with and approval of KiwiRail will be required.</p> <p>For clarity, KiwiRail wish to note that while the requirement includes the need to manage rail crossings, no new at-grade level crossings are likely to be approved by KiwiRail, in the event the development seeks any be formed.</p>	Retain as notified.

## **Comments on Clutha District Plan - Proposed Zoning Review: Balclutha, Milton and Stirling**

**To:** Clutha District Council  
**Comments on:** Clutha District Plan – Proposed Zoning Review: Balclutha, Milton and Stirling  
**On behalf of:** New Zealand Fire Service Commission (the NZFS Commission)

The New Zealand Fire Service Commission (the NZFS Commission) is the governing body that controls the New Zealand Fire Service (NZFS) and the National Rural Fire Authority (NRFA). The Fire Service Act 1975 and the Forest and Rural Fires Act 1977 establish the governance, management and operational arrangements for these organisations. It is a matter of prime importance for the NZFS Commission to take an active and co-ordinating role in the promotion of fire safety in New Zealand, through reducing the incidence of fire and the attendant risk to life and property; and through seeking unity and completeness of fire safety law and practice (as set out in the Fire Service Act 1975, section 20). The role of the Fire Service has widened, and now plays a crucial role in providing responses to many types of non-fire emergencies, such as hazardous substances emergencies, motor vehicle accidents, medical emergencies, civil emergencies and response to incidents in extreme weather.

The NZFS Commission provides the following comments on the Clutha District Plan – Proposed Zoning Review: Balclutha, Milton and Stirling ('Zoning Review') document in the context of its responsibilities as set out above.

### **1.1 Zoning Review of Balclutha, Milton and Stirling**

The NZFS Commission understands that the Zoning Review identifies Balclutha, Milton and Stirling as having opportunities for growth, specifically for future residential and industrial activities.

The NZFS Commission wishes to ensure that any industrial and residential development is adequately serviced in terms of water supply for firefighting and provision of access for fire appliances to a property (such as roading, gradient and access design). To effectively discharge its responsibilities under the Fire Service Act 1975, the NZFS is required to efficiently and effectively respond to fire and other emergencies. In order to achieve this, it requires access to a water supply which can provide the volumes and pressure necessary to sufficiently attend to a range of emergency situations. The most reliable form of firefighting water supply is provided via a fully reticulated water supply system. However, where this is not available there are alternative ways of supplying firefighting water that are still capable of meeting the operational firefighting requirements



of the NZFS. The design requirements for both water supply and access to this supply are contained within the New Zealand Standard *New Zealand Fire Service Firefighting Water Supplies Code of Practice* NZS PAS 4509:2008 (attached as Appendix A).

The NZFS seeks that any rezoning proposed through this Zoning Review, and the actions it directs, ensures that adequate firefighting water supply (and access to it), and access for fire appliances is provided.

#### Location of NZFS Facilities

Fire stations must be strategically located within and throughout communities to maximise their coverage and response times so that they can efficiently and effectively respond to emergency call outs in a timely way<sup>1</sup>. There are currently fire stations situated throughout the Clutha District and therefore should rezoning occur additional fire stations may be required to ensure adequate coverage is maintained throughout the district. The NZFS seeks that this Rezoning Review, and the actions it directs, make provision for such an emergency service facility.

#### Summary

The NZFS Commission wishes to ensure that new developments provide for the access and manoeuvring of fire appliances; meets with the New Zealand Fire Service Firefighting Water Supplies Code of Practice and enables the development of new emergency service facilities. The NZFS is happy to assist and/or advise in any way possible as planning for the identified rezoning areas progress.

Address for service: c/- Beca Limited  
PO Box 13960  
Christchurch 8141

Attention: Alice Burnett

Phone: +64 3 550 0038

Email: [alice.burnett@beca.com](mailto:alice.burnett@beca.com)



*(Signature of person authorised to sign on behalf of New Zealand Fire Service Commission)*

Date: 24 February 2017

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<sup>1</sup> Enabling the Commission to achieve its responsibilities under the FSA 1975



**RESOURCE MANAGEMENT ACT 1991**

**Submission on Plan Change 39 - Balclutha re-zoning  
Clutha District Council**

To: Clutha District Council  
PO Box 25  
**BALCLUTHA 9240**

Submitter: NZ Transport Agency  
PO Box 5245  
Moray Place  
**DUNEDIN 9058**

**This is a submission on the following proposed plan change:**  
Plan Change 39 - Balclutha re-zoning to the Clutha District Plan.

The NZ Transport Agency Could Not gain an advantage in trade competition through this submission.

**The specific provisions of the proposal that this submission relates to are:**  
The Plan Change in its entirety.

**The NZ Transport Agency's submission is:**

The NZ Transport Agency (Transport Agency) supports the majority of the proposed re-zoning in principle as it:

- Ensures that Balclutha will have sufficient residential and industrial land development capacity and that long term supply is maintained;
- Will ensure Balclutha has appropriate provisions to grow sustainably in the future;
- Formalises some existing zonings to reflect what some land is currently being used for;
- ensures efficiency and integration of services, while minimising the effects of urban development by locating the proposed areas adjacent to existing residential (either urban or transitional areas) and industrial areas.

***Proposed Transitional Resource Area*** - north of SH1 at the north-eastern end of Balclutha

The Transport Agency does not support that component of the Plan Change that involves changing the zoning of land on the north-west of State Highway 1 (SH1) at the north-eastern end of Balclutha, south of Johnston Road. Development in this location will contribute to the ribbon development of Balclutha along SH1 which will adversely affect the safety, efficiency and functionality of the State highway. The

Transport Agency is also concerned that it will be difficult to achieve safe access to this land given the vertical and horizontal alignment of the State highway in the vicinity of this site.

***Proposed Transitional Resource Area - adjacent to Cherry Lane and Nelson Road***

The Transport Agency also suggests that the proposed Transitional Resource Areas adjacent to and south of SH1 at the north-eastern end of Balclutha should not have direct access to SH1. Rather, this land should be accessed from Cherry Lane and Nelson Road as this will ensure the safety and efficiency of the transport network is maintained. The Transport Agency suggests specific rule(s) should be included in the District Plan to ensure this environmental outcome is achieved.

**The reasons for this submission are:**

The NZ Transport Agency's statutory objective is to carry out its functions in a way that contributes to an affordable, integrated, safe, responsive and sustainable land transport system. Some of these functions relevant in this case are:

- to promote an affordable, integrated, safe, responsive, and sustainable land transport system
- to manage the State highway system in accordance with the relevant legislation; and
- to assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).

In submitting on this proposed Plan Change, the Transport Agency is pursuing these objectives and functions in relation to the land transport system, including the State highway system.

**The NZ Transport Agency seeks the following decisions from the Council:**

That the Council endorse proposed Plan Change 39 apart from the Transitional Resource Area on the north-west of State Highway 1 (SH1) at the north-east end of Balclutha, south of Johnston Road which should remain as Rural Resource Area.

Also, the proposed Transitional Resource Area south of SH1 at the north-eastern end of Balclutha should not be accessed via the State highway and should be accessed via Cherry Lane and Nelson Road only. Specific rules to achieve this should be included in the District Plan.

**The NZ Transport Agency does wish to be heard in support of this submission.**

Dated at Dunedin this 11<sup>th</sup> day of December 2017.



**Tony MacColl**

Principle Planning Advisor  
Pursuant to a delegation from  
the Chairman and the Board  
of the NZ Transport Agency

**Address for Service:**

NZ Transport Agency  
PO Box 5245  
Moray Place

**DUNEDIN 9058**

**Attention: Tony MacColl**

**Phone: (03) 951 3009**

**Facsimile: (03) 951 3013**



Our Reference: A1072103

11 December 2017

Clutha District Council  
PO Box 25  
Balclutha 9240

Attention: David Campbell, Planning and Environment Manager

Dear David

**Otago Regional Council (ORC) submission on Clutha District Council (CDC) Plan Changes 39-41 Balclutha, Stirling and Milton rezoning**

ORC has reviewed the proposed plan change, and the accompanying section 32 reports which provide context for the proposed changes.

ORC has no comments to make in relation to the proposed rezoning at Stirling.

In making this submission, ORC makes the following requests in respect to the proposed changes:

**Milton Rezoning:**

**Amendment to Proposed Objective IND.3**

Add the following underlined text: "That development within the Industrial Resource Area (Toko Plains) is efficient, co-ordinated and supported by adequate services; integrates with adjoining infrastructure; and does not compromised the existing drainage systems, including overland flowpaths."

This is to make it clear that both the functions of manmade and natural drainage systems are to be protected.

**Amendment to Proposed Policy IND.5 (e):**

Add the following underlined text: "to protect existing drainage systems and overland flow paths within the Structure Plan area;"

Again, this is to clarify that provision is to be made not only for manmade drainage systems, but also the wider overland flow paths of the Tokomariro Plain.

**Proposed amendment Rule IND.1 General Section:**

'2. Toko Plains Structure Plan':

Bullet point 6: Add the following underlined text: "The management of stormwater and overland flow paths with in the Structure Plan area to ensure there is no increase in flood hazards"; and



This is to clarify that the purpose of the policy is to avoid increases in flood hazards and subsequent adverse effects.

**Proposed amendment to Rule IND.2 Permitted activities:**

Amend "Reasoning by adding to bullet point 3 "and overland flow paths" after "drainage system"

Again, this is to clarify that provision is to be made not only for manmade drainage systems, but also the wider overland flow paths of the Tokomariro Plain.

It would be of benefit to the community if the structure plan can reference that some activities within the structure plan may be controlled by:

- The ORC's Flood Protection Management Bylaw 2012, and
- ORC's Water, Waste and Air Plans

**Balclutha Rezoning:**

CDC must ensure that the proposed rezoning changes, particularly around the lower lying areas of Balclutha, continue to prevent the exacerbation of flood hazards.

ORC has a number of flood protection assets within or nearby to the proposed 'Industrial Resource Areas' off:


- Banego Road
- Owaka Highway

Activities that may affect these assets are controlled by the ORC's Flood Protection Management Bylaw 2012. Again, it would be of benefit to the community if CDC has the means to ensure users of the district plan are aware of this if looking to undertake activities in these areas.

ORC could not gain an advantage in trade competition through this submission.

ORC would not like to be heard in support of this submission.

Yours sincerely



Tanya Winter  
Director Policy, Planning, and Resource Management

Submission on Publicly Notified Proposal for Change to Plan  
Clause 6 of Schedule 1, Resource Management Act 1991



To: CLUTHA DISTRICT COUNCIL

Name of Submitter: Russell James Wilson  
(full name)

This is a submission on the following proposed change to the Clutha District Plan:

- Plan Change 39 – Balclutha Re-zoning
- Plan Change 40 – Stirling Re-zoning
- Plan Change 41 – Milton Re-zoning
- [delete any you are not submitting on]

I ~~could~~ / could not\* gain an advantage in trade competition through this submission.  
(\*Select one)

\*I am / ~~am not~~ # directly affected by an effect of the subject matter of the submission that –  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.

\*Delete entire paragraph if you could not gain an advantage in trade competition through this submission.  
#Select one

The specific provisions of the proposal that my submission relates to are [give details]:

Plan change to Golfers Drive (Road) and  
proposed change for area next to 36 Golfers Drive.

My submission is:

[include –

- Whether you support or oppose the specific provisions or wish to have them amended; and
- Reasons for your views].

We oppose any proposed Area change for Area  
next to where we live at 36 Golfers Drive.

Reasons- Area is a safe sanctuary for native  
wild life (birds) Area is quiet which is why we

QA 131811  
M. Ramsay  
D. Campbell

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GLUTHA DISTRICT COUNCIL

bought this house. Area has small piece directly on our property which is where we have food growing and store our things.

I seek the following decision from the local authority:  
*[give precise details]*

We would be seeking that the small area of land on our land not be affected by any proposed change, as this would affect our way of life (parking, vegetable garden etc) which would give us cause to sell and move away.

I wish / ~~do not wish~~ to be heard in support of my submission. *[select one]*

If others make a similar submission, I will consider presenting a joint case with them at a hearing.  
*[delete if you would not consider presenting a joint case]*

.....  
Signature of submitter  
*(or person authorised to sign on behalf of submitter)*

10/11/2017.....

Date  
*(A signature is not required if you make your submission electronically)*

Address for service of submitter:

Telephone: 027 4158087

Fax/email: russellj.wilson71@gmail.com

Contact person: *[name and designation, if applicable]*

36 Golfers Drive  
Baldutha.

