

Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

Road Metals Company Limited : Daryl Elwyn McMillan

[State full name]

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Timaru Proposed District Plan

[State the name of proposed or existing plan and (where applicable) change or variation].

I ~~can~~/could not* gain an advantage in trade competition through this submission.

[*Select one.]

~~* I 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 or strike through 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]

As per submissions attached to email

My submission is: [Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:

- Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or
- In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]

As per submissions attached to email

.....
.....
.....
.....
.....
.....
.....

I seek the following decision from the local authority: *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

.....
As per submissions attached to email
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

~~Wish~~ (or do not wish) † to be heard in support of my submission.

*[*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*
[†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.]*

Yes

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

[A signature is not required if you make your submission by electronic means]

Date 19/12/22

Electronic address for service of submitter: daryl@roadmetals.co.nz

Telephone: 021 350 414

Postal address (or alternative method of service under s352 of the Act):

..... P.O. Box 2341, Christchurch 8140

Contact person: *[name and designation, if applicable]* Daryl McMillan, Compliance & Consents Manager

Note to person making submission

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - It is frivolous or vexatious:
 - It discloses no reasonable or relevant case:
 - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - It contains offensive language:
 - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matter.

ROAD METALS

16 December 2022
Timaru District Council
P.O. Box 522
TIMARU 7940

Attention: Mr Hamish Barrell, Planning Manager
Subject: Road Metals Company Limited – Submission on Timaru District Council Proposed District Plan

Dear Mr Barrell,

Road Metals Company Limited (Road Metals) is a major provider of aggregate and quarry material solutions throughout the South Island, specifically; Christchurch, North Canterbury, South Canterbury, Kaikoura, Central Otago, and North Otago areas. Road Metals holds several resource consents authorising the extraction and processing of gravels on both land based and alluvial river systems throughout the listed regions, and are continuously implementing procedures, processes, education and plant solutions, designed and targeted to enhance, manage and improve the Company's health, safety, and environmental performance.

Road Metals have been in existence for over sixty-five years and is involved in the extraction, processing and stockpiling of gravel for roading, rail, construction, subdivision, building aggregates and in-river & coastal protection solutions. A significant portion of the aggregate is supplied for use in both State Highway and local roading upgrade and maintenance works, including infrastructure works from bridge to drainage solutions. These aggregate meets Waka Kotahi (New Zealand Transport Agency (NZTA)), local authority and project specific engineered technical specifications.

The resource of processed, engineered aggregate solutions are a critical and required solution which impacts all members of society to ensure cost effective construction, remediation and infrastructure resilience. These engineered solutions are used in all aspects of construction from driveways, roads, bridges, concrete to energy supply and emergency services requirements.

There are major advantages in the extraction of these natural resources, specifically, riverbed gravel extraction, where this has the positive attributes of controlling flood mitigation, flood management and infrastructure protection at incredibly low cost, or no cost to councils and regulators, whilst deriving positive benefits, specifically safety, to the local populace.

This has been recognised by the New Zealand Infrastructure Commission, who have published data on the risks of limiting, curtailing and making the utilisation of these resources too difficult, or economic to source.

Road Metals appreciate the opportunity Timaru District Council have afforded us to comment and submit on the Timaru District Council proposed district plan (changes).

Yours faithfully,

Daryl McMillan | Compliance & Consents Manager | Road Metals Co Ltd
T 03 319 5384 | M 021 350 414 | www.roadmetals.co.nz |

NOTE: Proposed amendments are:

- Strike through to remove / delete
- Underlined to add

DEFINITIONS:

Sub No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
1	<p>Bank (in relation to any river, lake and waterways)</p> <p>in relation to any river, lake and waterbody, means the outermost part of the bed of the river that comprises an acclivity or elevation of land above the level of the adjacent land or water and creates a boundary sufficient to prevent the water in the river from flowing into the neighbouring land at its fullest flow.</p>	Oppose	While this is a term that is used generically, it reads to relate to areas that are already incorporated by the RMA definition of “bed”. Figures in the proposed District Plan for ‘riparian area’ refer to the “bank edge”, but do not show the “bank”. This additional definition is likely to add a further layer of confusion and complexity to interpreting these terms, and does not provide any additional clarity as it fully overlaps the area already understood to be the “bed” of the river. None of the rules which use this term appear to require it to be distinguished from the “bed”.	Remove or edit this definition
2	<p>Clean fill material</p> <p>means virgin excavated natural materials including clay, gravel, sand, soil and rock that are free of:</p> <ul style="list-style-type: none"> a) combustible, putrescible, degradable or leachable components; b) hazardous substances and materials; c) products and materials derived from hazardous waste treatment, stabilisation or disposal practices; d) medical and veterinary wastes, asbestos, and radioactive substances; e) contaminated soil and other contaminated materials; and f) liquid wastes. 	Support	The definition of clean fill material, as derived from the National Planning Standard, only extends to virgin material. When used in the context of quarrying activities, this severely limits the ability of quarry operators to rehabilitate quarry areas as part of a quarrying activity due to the lack of availability of such material at any reasonable cost. The plan will require resource consent for rehabilitation involving any material not meeting this narrow definition of clean fill as the	<p>Retain definition</p> <p>Amend rules:</p> <p>To allow for quarry rehabilitation without a separate consent (the rehabilitation can be addressed / assessed in the land use consent)</p> <p>To allow for recycling of resource (concrete, etc)</p>

			<p>rules only make reference to quarrying activities, not the deposition of inert material within the excavated area associated with, for example, rehabilitation.</p> <p>In the context of waste minimisation, the definition is limiting in that it does not specifically include resource recovery unless it is simply recycling aggregate. Products such as concrete from demolition are typically processed after being received at the clean fill site. The current direction to minimise waste and the implications of the waste levy, recovering material at a quarry site has a number of advantages that the current plan does not realise.</p> <p>A remediated quarry has distinct advantages to council, as it allows for 'end of life' of the quarry, with potential for planned urban, residential and rural growth in a planned and time manner.</p>	
3	<p>Quarry means a location or area used for the permanent removal and extraction of aggregates (clay, silt, rock or sand). It includes the area of aggregate resource and surrounding land associated with the operation of a quarry and which is used for quarrying activities</p>	Support	Consistency to National definitions for easy implementation of plans.	Road Metals supports the National Planning Standards definitions of Quarry in the proposed plan.

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
4	<p>Quarrying activity means the extraction, processing (including crushing, screening, washing, and blending), transport, storage, sale and recycling of aggregates (clay, silt, rock, sand), the deposition of overburden material, rehabilitation, landscaping and clean filling of the quarry, and the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the quarry.</p>	Oppose	<p>Road Metals supports the definition of quarrying activity in so far as it seeks to encompass the range of activities that are associated with quarrying. Recognising that the definition is a result of the National Planning Standards, the definition has several challenges when applied in the context of the rules for mineral extraction (quarrying activities).</p> <p>Most significantly is the reference to clean filling in the context of quarry rehabilitation. The definition of clean fill material (also a definition drawn from the National Planning Standard), only extends to virgin material. This severely limits the ability of quarry operators to rehabilitate quarry areas as part of a quarrying activity due to the lack of availability of such material at any reasonable cost. As notified, the plan will require resource consent for rehabilitation involving any material not meeting the narrow definition of clean fill.</p> <p>In addition, in the context of waste minimisation, the definition is limiting in that it does not specifically</p>	<p>Retain definition</p> <p>Amend rules Refer to No. 2</p>

ROAD METALS

HEAD OFFICE:

Level 2, Building 12
12 Hazeldean Rd
P.O. Box 2341
CHRISTCHURCH
Ph: (03) 339- 9300

			<p>include resource recovery unless it is simply recycling aggregate. Products such as concrete from demolition are typically processed after being received at a clean fill site. Given the current direction to minimise waste and the implications of the waste levy, recovering material at a quarry site has a number of advantages that the current plan does not realise.</p> <p>A remediated quarry has distinct advantages to council, as it allows for 'end of life' of the quarry, with potential for planned urban, residential and rural growth in a planned and time manner.</p>	
5	<p>Sensitive environment means</p> <ol style="list-style-type: none"> 1) areas within the following overlays identified on the Planning map: <ol style="list-style-type: none"> a) Coastal Environment; and b) Coastal High Natural Character Areas; and c) Drinking Water Protection Area; and d) Heritage Item; and e) Heritage Item extent; and f) Outstanding Natural Features; and g) Outstanding Natural Landscapes and h) Sites and areas of Significance to Māori; and i) Significant Natural Areas; and j) Visual Amenity Landscapes; and k) Earthquake Fault Awareness Area; and l) High Hazard Areas; and m) Flood Assessment Area; and 	Oppose	<p>This is an extremely broad definition and captures a wide variety of overlays and plan notations. This definition has been used in two different rule contexts. The first is in relation to hazardous substance use, and the second is in relation to quarries and quarrying activities. These two activities have the potential to affect different sensitive areas, with some of the overlays and activities listed being relevant to one or the other, but not both of these activities. This creates a level of complexity and confusion in using this definition. Furthermore, new quarries/quarrying activities in the</p>	Delete definition

ROAD METALS

HEAD OFFICE: Level 2, Building 12
12 Hazeldean Rd
P.O. Box 2341
CHRISTCHURCH
Ph: (03) 339- 9300

	<p>n) Seawater Inundation Overlay; and o) Within 250m from Major Hazard Facilities; and 2) the below areas: a) The area within 100m from the edge of a Riparian Margin; and b) The area within 100m from the edge of a Wetland Area; and c) High Hazard Areas identified in a Flood Certificate issued under NH-S1.</p>		GRUZ are already discretionary activities so assessment against all relevant overlays would be required regardless of this definition being included.	
6	<p>Rural Industry means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</p>	Support	While this definition is a product of the National Planning Standards, Road Metals supports the recognition Of activities that support primary production. Road Metals assume that the storage of vehicles and machinery associated with quarrying activities (which are primary production activities as defined by the national Planning standards) is included under the definition of rural industry.	Retain the definition as notified on the basis that the definition encompasses the storage of vehicles and machinery associated with quarrying activities. Should this not be the case, then Road Metals seeks relief recognising that these activities support and service primary production activities such as quarrying, and therefore are appropriate in the rural zone.

MAPPING:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
7	SASM overlay	Oppose	The SASM mapping appears to differ from the areas identified as being of significance to Tangata Whenua in Environment Canterbury's Land and Water Regional Plan and Canterbury Air Regional Plan. the regional and district plans should use the same mapping/identification of significant areas.	Align SASM overlay with areas of significance used by Environment Canterbury's planning documents.

STRATEGIC DIRECTION:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
8	<p>SD-O8 Infrastructure Across the District:</p> <ul style="list-style-type: none"> i. improved accessibility and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes; ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of new development; iii. drinking water supplies are protected from the adverse effects of subdivision, use and development; iv. the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects appropriately. 	Oppose	The strategic directions portion of the proposed plan does not include consideration of activities that provide an important part of the supply chain for critical infrastructure, such as quarries. These should be recognised at a strategic level.	Amend SD-O8 to include recognition of the value and necessity of materials to support the construction, repair, maintenance and upgrade of infrastructure, including critical and lifeline infrastructure: SD-O8 Infrastructure Across the District: <ul style="list-style-type: none"> i. improved accessibility and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes; ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of new development; iii. drinking water supplies are protected from the adverse effects of subdivision, use and development; iv. the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and

				<p>upgrading and development is enabled while managing adverse effects appropriately;</p> <p>v. <u>infrastructure is supported through a readily available, local supply of the physical construction materials requirements of infrastructure.</u></p>
9	<p>SD-09 Rural Areas</p> <p>A range of primarily productive activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations, while:</p> <ul style="list-style-type: none"> i. protecting versatile soils for productive uses; ii. managing the adverse effects of intensive activities on sensitive activities; iii. managing the adverse effects of new sensitive activities on primary production; iv. avoiding activities that have no functional/operational need to locate in the rural area; v. identifying and maintaining the character, qualities and amenity values of rural areas; vi. ensuring Future Development Area overlay remains available for future urban or rural lifestyle development. 	Support	<p>Quarrying activities are included in the definition of primary production activities under the National Planning Standards. Road Metals support the recognition of the need to avoid reverse sensitivity effects on primary production activities, including quarrying activities</p>	Retain

ENERGY, INFRASTRUCTURE & TRANSPORT

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
10	<p>EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond) which exceeds 500m in area</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The combined area of all existing and proposed stormwater basins and/or water bodies, that are wholly or partly within 0.75km of the centre of the proposed water body or stormwater basin's, shall not exceed 1,000m²;</p> <p>PER-2 Any stormwater basin has been designed by a suitably qualified person, with experience in stormwater management systems, to the following standards:</p> <ol style="list-style-type: none"> 1. Stormwater infiltration basins shall be designed to fully drain within 48 hours of the cessation of a 2% AEP storm event; 2. Sufficient rapid soakage overflow capacity shall be provided to minimise any ponding of stormwater outside the infiltration area(s); and 3. Plant species used shall be limited to those listed in Table 3 below 	Oppose	<p>Clause PER-3 requires that all waterbodies be designed by a person with stormwater management experience. This is relevant for stormwater systems (PER-2).</p> <p>There are many other types of water bodies where it does not make sense for stormwater management experience to be needed (for example, ponds for wash water that may be present in a quarry, consented water abstraction ponds, etc). For the standards listed in PER-3, stormwater management does not appear to be relevant.</p> <p>Quarry operations within the district currently operates these existing ponds on these sites within the bird strike overlay.</p> <p>The interpretation of the rule as written is that replacement of these existing ponds would not require consent (as they are not new ponds), this be made explicit in the rule.</p>	<p>Amend EI-38 as follows:</p> <p>EI-R38 Creation of a new stormwater basin or water body (including wastewater oxidation pond but excluding a replacement of an existing pond) which exceeds 500m in area</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The combined area of all existing and proposed stormwater basins and/or water bodies, that are wholly or partly within 0.75km of the centre of the proposed water body or stormwater basin's, shall not exceed 1,000m²;</p> <p>PER-2 Any stormwater basin has been designed by a suitably qualified person, with experience in stormwater management systems, to the following standards:</p> <ol style="list-style-type: none"> 1. Stormwater infiltration basins shall be designed to fully drain within 48 hours of the cessation of a 2% AEP storm event;

	<p>PER-3 Any water body has been designed by a suitably qualified person, with experience in stormwater management systems, to the following standards:</p> <ol style="list-style-type: none"> 1. No permanent island features shall be included, that could provide perching sites for birds; and 2. Plant species used shall be limited to those listed in Table 3 below. 			<p>2. Sufficient rapid soakage overflow capacity shall be provided to minimise any ponding of stormwater outside the infiltration area(s); and</p> <p>3. Plant species used shall be limited to those listed in Table 3 below</p> <p>PER-3 Any water body has been designed by a suitably qualified person, with experience in stormwater management systems, to the following standards:</p> <ol style="list-style-type: none"> 1. No permanent island features shall be included, that could provide perching sites for birds; and 2. Plant species used shall be limited to those listed in Table 3 below.
<p>11</p>	<p>EI-R40 New landfills, excluding clean fills, within the Bird strike Management Overlay</p> <p>Activity status: Discretionary</p>	<p>Oppose</p>	<p>The definition of clean fill is narrow and includes only virgin earth and rock materials. There are a number of other types of fill that would formerly have been included in the definition of “clean fill”, for example construction and demolition waste materials. These are commonly used to backfill excavated areas such as quarries. These types of fill do not contain putrescible waste and are not attractive to birds, and do not represent a risk within the Bird strike Management Overlay. These filling activities (formerly defined as clean filling activities) are currently undertaken at</p>	<p>Extend the exclusions so that managed and controlled fills that do not include putrescible waste and do not attract birds are not limited.</p> <p>EI-R40 New landfills, excluding clean fills, managed or controlled fills within the Bird strike Management Overlay</p> <p>Activity status: Discretionary</p>

			Multiple quarries in proximity to Christchurch Airport. Using the very narrow definition of clean fill will limit the ability to effectively rehabilitate quarries.	
--	--	--	---	--

CONTAMINATED LAND:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
12	CL-O1 Management of contaminated land Contaminated land is made safe for human Health and its intended use before any change of use, land disturbance, development or subdivision.	Oppose	The wording of CL-O1 is unclear and can be confused, we request that it be amended for clarity and to assist with ease of implementation	Amend CL-O1 to improve clarity: CL-O1 Management of contaminated land Contaminated land is made safe for human health and its intended use before any change of use, land disturbance, development or subdivision so that human health of users and residents of the site is protected.
13	CL-P1 Investigation of contaminated and potentially contaminated land Require the investigation of contaminated land or potentially contaminated land prior to any change of use, land disturbance, development or subdivision of land that could result in an increase in the risk to human health resulting from any contamination of the land.	Oppose	This policy negates the methodology of ascertaining contaminates investigation of contaminated land gives valuable information about the contaminant types and concentrations present at the site. However, there are some instances where investigation is not feasible or efficient prior to soil disturbance being undertaken. This policy should provide allowance and flexibility for instances and projects where investigation prior to the disturbance is not practicable.	Amend policy Cl-P1 to provide flexibility for instances where investigation is not practicable: CL-P1 Investigation of contaminated and potentially contaminated land Require the investigation of contaminated land or potentially contaminated land prior to any change of use, land disturbance, development or subdivision of land that could result in an increase in the risk to human health resulting from any contamination of the land, <u>except in instances where it</u>

ROAD METALS

HEAD OFFICE: Level 2, Building 12
12 Hazeldean Rd
P.O. Box 2341
CHRISTCHURCH
Ph: (03) 339- 9300

				is not safe or not practicable to undertake investigation prior to the project commencing, or if disturbance is required to ascertain contaminants.
14	<p>CL-P3 Remediation and management works Ensure that the risks to human health from any remediation of, or any management works undertaken on, contaminated land, do not increase, and, where possible encourage the reduction of those risks.</p>	Oppose	The wording of CL-P3 is confusing, we request that it be amended for clarity and to assist with ease of implementation.	<p>Amend CL-P3 to improve clarity:</p> <p>CL-P3 Remediation and management works Ensure that the risks to human health from any remediation of, or any management works undertaken on, contaminated land, do not increase the risks to human health from the <u>contamination that is present</u>, and, where possible encourage the reduction of those risks.</p>

NATURAL HAZARDS:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
15	<p>NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m2 or More</p> <p>1. Flood Assessment Area Overlay Activity status: Permitted</p> <p>Where:</p> <p>PER-1 the building is built to the minimum finished floor level specified in an existing consent notice that is less than five years old; or</p>	Oppose	This rule manages activities within the flood assessment overlay (where there may be a risk of flooding), to manage the risk of flooding on those activities. Protecting buildings from natural hazards such as flooding is important. However, there is some ambiguity in the wording of the title of this rule. The rule covers “natural hazard sensitive activities” which is a defined term “or structures”. There is some ambiguity over whether this is intended to apply to all structures, or just those that are sensitive to natural hazards.	<p>Amend description of NH-R4.1 to remove ambiguity:</p> <p>NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m2 or more</p>

	<p>PER-2 A Flood Risk Certificate for the activity has been issued in accordance with NH-S1; and</p> <p>PER-3 The Flood Risk Certificate issued under PER-2 states that the activity is not located on land that is within an overland flow path; and</p> <p>PER-4 The Flood Risk certificate issued under PER-2 states that the activity is not located on land that is identified as a High Hazard area; and</p> <p>PER-5 The Flood Risk Certificate issued under PER-2 states either:</p> <ol style="list-style-type: none"> 1. the activity is located on land that is not subject to flooding in a 0.5% AEP rainfall event; or 2. the activity is located on land that is subject to flooding in a 0.5% AEP rainfall event and complies with the minimum finished floor level requirement for the site. 		<p>Furthermore, additions to such activities or structures with a ground floor area of 30m² or more are captured by the rule. Given that ground floor area is a defined term and applies to buildings but not all structures, interpretation of this clause is ambiguous</p>	
--	--	--	---	--

HAZARDEOUS SUBSTANCES:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
16	<p>HS-R1 Use and/or storage of hazardous substances in a Oppose hazardous facility (excluding Major Hazard Facilities) Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The hazardous facility is located outside a sensitive environment (other than a Flood Assessment Area Overlay); and</p> <p>PER-2 The activity is within a Flood Assessment Area Overlay and the hazardous facility has a finished floor level equal to or higher than the minimum floor level as stated in a Flood Risk Certificate issued in accordance with NH-S1.</p>	Oppose	Recent changes to the RMA have recognised that there was significant overlap and duplication of hazardous substances management between the Hazardous Substances and New Organisms Act (HSNO) and district and regional plans. These changes recognise that HSNO manages the risks of hazardous substances in most instances, and recommended that duplication of regulation be avoided as much as practicable. While we support management of risks from hazardous substances where this is warranted, the use of the “sensitive environment” definition in this rule makes it extremely broad, and means that hazardous substances will require consent under almost any overlay in the District Plan. Many of these are not relevant to effects from hazardous substances, for example visual amenity landscapes.	Be specific re the definition of “sensitive environment” and restrict the matters to those relevant to effects from hazardous substances, or alternatively list the relevant matters in this rule and remove the definition.

SITES AND AREAS OF SIGNIFICANCE TO MAORI:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
17	<p>SASM-R5 Mining and Quarrying</p> <p>2.Wai Taoka Overlay Activity status: Permitted</p>	Oppose	It is important to maintain and protect our cultural heritage through regulating activities that may adversely affect those values. However, it is also important that regulation is efficient as possible and	<p>Retain this activity as a permitted activity.</p> <p>Alter the wording of PER-1:</p>

	<p>Where:</p> <p>PER-1 The quarrying is from the bed of a river, and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained); and</p> <p>PER-2 Excavated materials are removed from the Bed within 10 days.</p>		<p>minimises duplication of regulation.</p> <p>We support clause PER-1 which will avoid duplication of regulation in areas where the risks are already managed through a consent held from Environment Canterbury.</p> <p>Note: the word “quarrying” is not a defined term, and this could cause confusion as to whether this rule relates to “quarrying activities” which is separately defined</p> <p>PER-2 be deleted, as this is specified in consents issued by Environment Canterbury.</p>	<p>PER-1 The quarrying is from <u>in</u> the bed of a river, and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained);and</p> <p>PER-2 Excavated materials are removed from the bed the bed of the within 10 days.</p>
18	<p>SASM-R5 Mining and quarrying</p> <p>1. Wāhi tūpuna Overlay Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The mining and/or quarrying do not exceed a maximum area of 750m²; and</p> <p>PER-2 The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to</p>	Oppose	<p>It is important to maintain and protect our cultural heritage through regulating activities that may adversely affect those values. However, it is also important that regulation is efficient as possible and minimises duplication of regulation. We request that a clause similar to SASM-R5 PER-1 be added to this rule, to avoid duplication where consent covering similar matters has already been obtained.</p> <p>Refer to point above regarding defined and specific terms.</p>	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The mining and/or quarrying do not exceed a maximum area of 750m²; and</p> <p>PER-2 The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks- <u>Or</u></p>

	the commencement of any earthworks			<p><u>PER-3</u> <u>The quarry is in the bed of a river and is authorised under the Canterbury Land and Water Regional Plan (either as a permitted activity, or through a resource consent having been obtained).</u></p>
--	------------------------------------	--	--	---

ECOSYSTEMS AND INDIGENEOUS BIODIVERSITY:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
19	<p>ECO-P5 Protection of Significant Natural Areas Avoid the clearance of indigenous vegetation and earthworks within in part SNAs, unless these activities:</p> <ol style="list-style-type: none"> 1. can be undertaken in a way that protects the identified ecological values; and 2. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure. 	Oppose	<p>The exposure draft of the National Policy Statement for Indigenous Biodiversity (July 2022) (NPSIB) includes consideration of aggregate extraction activities in areas of indigenous biodiversity. This recognises that quarrying activities must be undertaken where the aggregate resources exist and provides for these activities in certain circumstances. We request that provision for aggregate extraction be provided for in ECO-P5, consistent with the exposure draft of the NPSIB.</p>	<p>Amend the wording of ECO-P5 to provide for quarrying activities, consistent with the NPSIB:</p> <p>ECO-P5 Protection of Significant Natural Areas Avoid the clearance of indigenous vegetation and earthworks within SNAs, unless these activities:</p> <ol style="list-style-type: none"> 1. can be undertaken in a way that protects the identified ecological values; and 2. are for regionally significant infrastructure and it can be demonstrated that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure; or

				3. <u>are for a quarry that provides significant national or regional public benefit that could not otherwise be achieved domestically.</u>
20	<p>Eco-R1 – Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)</p> <p>Activity status: Permitted</p> <p>Where</p> <p>PER-1 The vegetation to be cleared is causing an imminent danger to human life, structures, or utilities and the clearance is undertaken in accordance with advice from a suitably qualified arborist; or</p> <p>PER-2 The clearance is carried out by the relevant Road Requiring Authority:</p> <ol style="list-style-type: none"> 1. to install road safety assets for the purpose of reducing traffic risk within the road corridor, and the clearance is less than 5m² within a single SNA; or 2. to maintain existing roadside drainage; or <p>PER-3 The vegetation clearance is carried out by Ngāi Tahu whānui for the purposes of mahika kai or other customary uses, where it has</p>	Support in Part	<p>This rule provides protection for indigenous vegetation, but also provides a pathway for some important activities to be undertaken without resource consent. We note that there are some key activities which are regularly undertaken for the purpose of maintaining existing infrastructure or for maintaining public safety that are not captured in the rule as currently drafted. Altering the wording slightly will make it clearer which activities are included and which are not.</p> <p>For clarity, we suggest making it clear that agents of the Road Requiring Authority are also able to work under this rule.</p>	<p>Amend the wording of rule ECO-R1 to provide for operational maintenance activities:</p> <p>Eco-R1 – Clearance of indigenous vegetation (except as provided for in ECO-R2 for flood protection works or ECO-R3 for National Grid activities)</p> <p>Activity status: Permitted</p> <p>Where</p> <p>PER-1 The vegetation to be cleared is causing an imminent danger to human life, <u>or is affecting the safe operation of</u> structures, or utilities, and the clearance is undertaken in accordance with advice from a suitably qualified arborist; or</p> <p>PER-2 The clearance is carried out by the relevant Road Requiring Authority or their agent:</p> <ol style="list-style-type: none"> 1. to install, <u>repair, maintain or upgrade</u> road safety assets for the purpose of reducing traffic risk within the road

	<p>been certified by Te Runanga o Arowhenua that the activity will meet tikanga protocol (Note: Te Runanga o Arowhenua will notify the Timaru District Council prior to such activities occurring); or</p> <p>PER-4 The vegetation clearance is carried out to remove material infected by unwanted organisms as declared by the Minister for Primary Industries Chief Technical Officer, or an emergency declared under the Biosecurity Act 1993; or</p> <p>PER-5 The clearance is unavoidable in the course of removing pest plants and pest animals in accordance with any regional pest management plan or the Biosecurity Act 1993, or where this occurs as part of indigenous biodiversity restoration or enhancement.</p>			<p>corridor, and the clearance is less than 5m² within a single SNA; or</p> <p>2. to maintain existing roadside drainage; or</p> <p>PER-3 The vegetation clearance is carried out by Ngāi Tahu whānui for the purposes of mahika kai or other customary uses, where it has been certified by Te Runanga o Arowhenua that the activity will meet tikanga protocol (Note: Te Runanga o Arowhenua will notify the Timaru District Council prior to such activities occurring); or</p> <p>PER-4 The vegetation clearance is carried out to remove material infected by unwanted organisms as declared by the Minister for Primary Industries Chief Technical Officer, or an emergency declared under the Biosecurity Act 1993; or</p> <p>PER-5 The clearance is unavoidable in the course of removing pest plants and pest animals in accordance with any regional pest management plan or the Biosecurity Act 1993, or where this occurs as part of indigenous biodiversity restoration or enhancement.</p>
--	--	--	--	--

21	New rule – ECO-R5	Support	As noted in re ECO-P5, the NPSIB recognises the importance of aggregate extraction, which is locationally based. To reflect the policy direction provided by the NPSIB, a new rule should be added to reflect this policy direction and provide for quarrying activities.	<p>ECO-R5 Clearance of indigenous vegetation for quarrying activities</p> <p>Activity status: Restricted discretionary</p> <p>The matters of discretion are:</p> <ol style="list-style-type: none"> 1. The effects that the vegetation alteration or removal will have on ecological values, including on threatened systems and ecosystems. 2. The effects that vegetation removal will have on soil conservation, water quality and hydrological function of the catchment 3. Methods to offset and compensate for the adverse effects of vegetation alteration and removal. 4. Methods to contain and control plant pathogens and diseases, and pest plants.
----	--------------------------	---------	---	--

NATURAL CHARACTER:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
22	<p>NATC-P5 Anticipated activities in riparian margins</p> <p>Provide for activities in riparian margins which are appropriate for safety, enhancement, wellbeing or customary reasons, by enabling:</p> <ol style="list-style-type: none"> 1. activities which are undertaken by a local authority for the purpose of natural hazard mitigation works, and where possible, any 	Opposed	Aggregate extraction activities, by their nature, must be located where the aggregate naturally occurs. This is recognised in policy direction such as the NPSIB and recently amended National Environmental Standard for Freshwater and National Policy Statement for Freshwater Management. This policy should therefore provide for	<p>Include provision for aggregate extraction from riverbeds in Policy NATC-P5</p> <p>NATC-P5 Anticipated activities in riparian margins</p> <p>Provide for activities in riparian margins which are appropriate for safety,</p>

ROAD METALS

HEAD OFFICE: Level 2, Building 12
12 Hazeldean Rd
P.O. Box 2341
CHRISTCHURCH
Ph: (03) 339- 9300

	<p>adverse effects on natural character are minimised;</p> <ol style="list-style-type: none"> 2. vegetation clearance to remove pest species 3. vegetation clearance for mahika kai purposes; 4. planting of indigenous species that is for the purpose of restoration and enhancement activities; and 5. earthworks that are for the purpose of maintenance and repair of existing fences, tracks, roads or for limited new fencing and tracks. 		<p>activities such as extraction of aggregate, which is necessary to support the construction and maintenance of housing and infrastructure, from riverbeds.</p>	<p>enhancement, wellbeing or customary reasons, by enabling:</p> <ol style="list-style-type: none"> 1. activities which are undertaken by a local authority for the purpose of natural hazard mitigation works, and where possible, any adverse effects on natural character are minimised; 2. vegetation clearance to remove pest species 3. vegetation clearance for mahika kai purposes; 4. planting of indigenous species that is for the purpose of restoration and enhancement activities; and 5. earthworks that are for the purpose of maintenance and repair of existing fences, tracks, roads or for limited new fencing and tracks; and 6. <u>quarry activities, which must be located where aggregate is located and support the construction and maintenance of homes and infrastructure.</u>
23	<p>NATC-R1 Vegetation clearance Riparian margins of a river that is not an HNWB</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The vegetation clearance only involves plant species identified in ECO-R7, or pest plant species identified within a regional pest</p>	Oppose	<p>This rule provides for a very narrow range of activities in riparian margins and unnecessarily constrains some activities which are undertaken as 'day to day' activities, and for purposes which are provided for under the supporting policies such as NATC-P5. While we recognise that the NPS-FM provides stronger direction for protection of rivers, providing for these necessary maintenance activities of existing</p>	<p>Expand rule NATC-P1 to provide for all activities necessary to support the operation and maintenance of existing infrastructure and provide for gravel extraction activities.</p> <p>NATC-R1 Vegetation clearance Riparian margins of a river that is not an HNWB</p> <p>Activity status: Permitted</p>

	<p>management plan or the Biosecurity Act 1993; or</p> <p>PER-2 The vegetation clearance is for customary harvest provided for in ECO-R1.1 PER-3; or</p> <p>PER-3 The vegetation clearance is for the operation, maintenance or repair of the National Grid; or</p> <p>PER-4 The vegetation clearance is for the maintenance, repair, or upgrade in seal cover, of existing roads; or</p> <p>PER-5 The vegetation clearance is to restore or enhance the natural character or ecological values of the riparian margin; or</p> <p>PER-6 The vegetation clearance only includes exotic species in areas of cultivation existed prior to 22 September 2022.</p>		<p>infrastructure will not undermine this purpose, as their effects are likely to be similar to those activities already provided for. This will provide a more comprehensive and user-friendly rule framework.</p>	<p>Where:</p> <p>PER-1 The vegetation clearance only involves plant species identified in ECO-R7, or pest plant species identified within a regional pest management plan or the Biosecurity Act 1993; or</p> <p>PER-2 The vegetation clearance is for customary harvest provided for in ECO-R1.1 PER-3; or</p> <p>PER-3 The vegetation clearance is for the operation, maintenance or repair of the National Grid; or</p> <p>PER-4 The vegetation clearance is for the maintenance, repair, or upgrade in seal cover, of existing roads, <u>including their associated bridges, stormwater infrastructure and signage</u>; or</p> <p>PER-5 The vegetation clearance is to restore or enhance the natural character or ecological values of the riparian margin; or</p>
--	--	--	---	--

				<p>PER-6 The vegetation clearance only includes exotic species in areas of cultivation existed prior to 22 September 2022;</p>
24	<p>NATC-R3 Earthworks</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The earthworks are required for the maintenance and repair of existing fences, tracks, roads or natural hazard mitigation works; or</p> <p>PER-2 The earthworks are required to construct a new fence; or</p> <p>PER-3 The earthworks are required to construct a new track up to 3m in width; or</p> <p>PER-4 The earthworks are required for the operation, maintenance or repair of the National Grid</p>	Oppose	<p>This rule currently provides for earthworks associated with the maintenance and repair of some listed infrastructure to be undertaken as a permitted activity. There are other similar activities that could be provided for in this rule that would have effects similar to those already listed. Expanding this rule to cover other commonly used infrastructure would reduce the consenting burden but have similar effects.</p>	<p>Include other activities similar in nature to those listed in the rule as currently proposed:</p> <p>NATC-R3 Earthworks</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The earthworks are required for the maintenance, <u>upgrade</u>, and/or repair of existing fences, tracks, roads, <u>bridges</u>, <u>pipelines</u>, <u>drainage or sewerage and other critical infrastructure</u>, or natural hazard mitigation works; or</p> <p>PER-2 The earthworks are required to construct a new fence; or</p> <p>PER-4 The earthworks are required for the operation, maintenance or repair of the National Grid.</p>

				<p>PER-3 The earthworks are required to construct a new track up to 3m in width; or</p> <p>PER-4 The earthworks are required for the operation, maintenance or repair of the National Grid.</p>
25	<p>Activity status when compliance not achieved with PER-2, PER-3, PER-4, PER-5, PER-6 or CON 1: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the extent of any adverse effects on the overall natural character of an area by reference to the values listed in NATC-P1 and 2. the nature of any proposed mitigation measures that contribute to the preservation, maintenance or enhancement of the natural character values of the area, particularly in and along an HNWB; and ; 3. the extent to which alternative practicable options have been considered and their feasibility; and 4. the extent to which any restoration or enhancement of the natural character of the area is proposed; and 5. the extent to which the proposal has the 	Support	<p>Activities that do not comply with the permitted or controlled activity Standards are Restricted discretionary activities. We support the inclusion of matter of discretion 6, which provides recognition that some activities have a functional need to be located in proximity to rivers.</p>	Retain matter of discretion 6

	<p>potential to cause or exacerbate bank erosion; and 6. whether there is a functional need for the activity to locate in a riparian margin.</p>			
--	--	--	--	--

NATURAL CHARACTER AND LANDSCAPES:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
26	<p>NFL-P2 Enabling appropriate use and development Enable certain activities in Visual Amenity Landscapes, Outstanding Natural Features and Outstanding Natural Landscapes, including existing non-intensive primary production, small scale earthworks, maintenance of existing tracks and fences, and underground utilities, that are consistent with:</p> <ol style="list-style-type: none"> 1. protecting the identified values and characteristics of the Outstanding Natural Landscapes and Outstanding Natural Features described in SCHED8 – Schedule of Outstanding Natural Landscapes and SCHED9 – Schedule of Outstanding Natural Features ; and 2. maintaining or enhancing the identified values and characteristics of the Visual Amenity Landscapes described in SCHED10 – Schedule of Visual Amenity Landscapes. 	Support	This policy recognises and provides for the continuation of existing primary production activities, provided the recognised values are maintained.	Nil

PUBLIC ACCESS:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
27	<p>PA-O1 Public access Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where desirable.</p>	Oppose	<p>Public access to the coastal marine area, and the margins of rivers and lakes is valuable, including for activities such as gravel extraction.</p> <p>There are times where public access to these areas should be able to be restricted, for instance when public safety is at risk.</p> <p>The objective could be drafted to more clearly articulate when restriction is likely to be warranted.</p> <p>“Desirable” is a subjective term and we request this be substituted for a different term.</p>	<p>Amend the objective to articulate more clearly what is considered “desirable”:</p> <p>PA-O1 Public access Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where <u>desirable</u> <u>necessary</u> to <u>avoid adverse effects on natural character, landscape, indigenous biodiversity, cultural or recreational values, health and safety, or the rights of private property owners.</u></p>
28	<p>PA-P4 Limiting public access Only allow an exemption for the requirement to provide public access or limiting an existing public access, on a temporary or permanent basis, for one or more of the following reasons:</p> <p>1. in order to protect:</p> <ul style="list-style-type: none"> a) sensitive indigenous species and their habitats; or b) sites and activities of cultural value to mana whenua; or c) historic heritage; or d) public health or safety; or e) the natural character values of the coastal marine area, wetland or rivers; or f) the stability, performance, maintenance and 	Support	Supports public health and safety	Nil

	<p>operation of regionally significant infrastructure; or g) the natural buffers to coastal erosion or river flooding; or 2. in order to enable temporary activities including temporary events.</p>			
--	--	--	--	--

VERSATILE SOIL:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
29	<p>VS-P2 Maintaining availability of versatile soils Maintain the availability of versatile soils for non-intensive primary production within the Versatile Soils Overlay by:</p> <ol style="list-style-type: none"> 1. limiting areas covered by buildings or other impervious surfaces; and 2. encouraging land use practices that reduce the potential for erosion; and 3. 3. requiring earthworks be undertaken in a manner that restores the properties of the soil to the levels they were prior to the earthworks being undertaken; and 4. 4. ensuring any subdivision results in allotment sizes which retain the productive capacity for non-intensive primary production; and 5. 5. only allowing activities that foreclose the ability to use versatile soils for non-intensive primary production where: <ol style="list-style-type: none"> a) the activity is necessary to support non-intensive primary production; or b) there are significant wider public 	Oppose	<p>As noted previously in this submission, quarries must be located where the aggregate resources are located. The National Policy Statement for Highly Productive Land (NPS-HPL) recognises this and provides policies and consenting pathways for quarries to be located in areas of versatile soils when necessary. This policy should follow the direction of the NPS-HPL.</p> <p>Additionally, rehabilitation can provide for productive soils to be returned to areas that have formerly been quarried.</p>	<p>Include provision for quarrying activities in areas of versatile soils when necessary:</p> <p>VS-P2 Maintaining availability of versatile soils Maintain the availability of versatile soils for non-intensive primary production within the Versatile Soils Overlay by:</p> <ol style="list-style-type: none"> 1. Limiting areas covered by buildings or other impervious surfaces; and 2. encouraging land use practices that reduce the potential for erosion; and 3. requiring earthworks be undertaken in a manner that restores the properties of the soil to the levels they were prior to the earthworks being undertaken; and

	<p>benefits from the activity and there is a functional, technical or operational need to be located in overlay; or</p> <p>c) it is provided for by VS-P3.</p>			<p>4. ensuring any subdivision results in allotment sizes which retain the productive capacity for non-intensive primary production; and</p> <p>5. only allowing activities that foreclose the ability to use versatile soils for non-intensive primary production where:</p> <p>a) the activity is necessary to support non-intensive primary production; or</p> <p>b) there are significant wider public benefits from the activity and there is a functional, technical or operational need to be located in overlay; or</p> <p>c) it is provided for by VS-P3; <u>or</u></p> <p>d) <u>the activity is a quarry that provides significant national or regional public benefit that could not otherwise be readily achieved using resources within New Zealand.</u></p>
--	--	--	--	---

SUBDIVISIONS:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
30	<p>SUB-O3 Rural subdivision Subdivision in the rural zones will:</p> <p>1. minimise the fragmentation of productive land in the General Rural Zone; and</p> <p>2. maintain the low-density open character of the General Rural Zone; and</p>	Support in Part	This objective rightly recognises that reverse sensitivity effects can arise from subdivision in rural areas. However, it is not clear why only intensive primary production is protected from these reverse sensitivity effects. All primary production activities in the rural zone	<p>Amend to provide broader protection from reverse sensitivity effects.</p> <p>SUB-O3 Rural subdivision Subdivision in the rural zones will:</p>

	<p>3. maintain a contrast between the rural environment and adjoining urban, Rural Lifestyle and Settlement zones; and</p> <p>4. minimise reverse sensitivity effects on intensive primary production.</p>		<p>should be protected from reverse sensitivity effects.</p>	<p>1. minimise the fragmentation of productive land in the General Rural Zone; and</p> <p>2. maintain the low-density open character of the General Rural Zone; and</p> <p>3. maintain a contrast between the rural environment and adjoining urban, Rural Lifestyle and Settlement zones; and</p> <p>4. minimise reverse sensitivity effects on intensive primary production.</p>
31	<p>SUB-P5 Reverse sensitivity</p> <p>Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and legally established intensive primary production</p>	<p>Support in Part</p>	<p>As per SUB-03, this policy rightly recognises that reverse sensitivity effects can arise from subdivision in rural areas. However, it is not clear why only intensive primary production is protected from these reverse sensitivity effects. All primary production activities in the rural zone should be protected from reverse sensitivity effects.</p>	<p>Amend to provide broader protection from reverse sensitivity effects.</p> <p>SUB-P5 Reverse sensitivity</p> <p>Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities and legally lawfully established intensive primary production.</p>

COASTAL ENVIRONMENT:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
32	<p>CE-R14 – Quarrying/Mining Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone)</p> <p>Activity status: Non-complying</p>	Oppose	<p>As referenced earlier in this submission, aggregate resources are necessary for day-to-day activities, and infrastructure such as roading, houses, and drainage. Aggregate resources are locationally based and must be obtained where they are located.</p> <p>The non-complying status of this activity does not suitably recognise the importance of these resources and the way they are spatially located. In terms of clarity of language, “mining activity” is not a defined term, but “quarrying activity” is, re-arranging the wording would align better with the defined terms</p>	<p>CE-R14 – Quarrying/Mining/Quarrying Activity (excluding for natural hazard mitigation works or reclamation within or adjacent the Port Zone)</p> <p>Activity status: Non-complying <u>Restricted Discretionary</u></p> <p><u>Matters of discretion are restricted to:</u></p> <ol style="list-style-type: none"> <u>1. the extent to which the proposal results in an increased risk of economic, social or environmental harm;</u> <u>2. whether the proposal includes hazard mitigation;</u> <u>3. measures to avoid, remedy or mitigate adverse effects on areas of Coastal High Natural Character</u> <u>4. the functional need for the mine/quarry to be in this location;</u> <u>5. the extent of any positive benefits that will result from the proposal; and</u> <u>6. the extent to which the proposal creates natural hazard risks on adjacent properties.</u>

EARTHWORKS:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
33	<p>Note: Activities not listed in the rules of this chapter are classified as a permitted under this chapter. For certain activities, consent may be required by rules in more than one chapter in the Plan. Unless expressly stated otherwise by a rule, consent is required under each of those rules. The steps plan users should take to determine which rules apply to any activity, and the status of that activity, are provided in Part 1, HPW – How the Plan Works -General Approach.</p> <p>EW-R1 Earthworks, excluding earthworks:</p> <p>a) for tree planting, or the removal of trees not protected by the District Plan; b) for test pits, wells or boreholes permitted under a regional plan or where all necessary regional resource consents have been obtained; c) for infrastructure permitted in the Energy, Infrastructure and Transport chapters of the Plan; d) required for maintenance of existing drains and ponds; e) for natural hazard mitigation works carried out by Timaru District Council or Canterbury Regional Council that are permitted by the relevant Plan chapter; f) for cemeteries, including pet cemeteries, and urupā; g) permitted under a National Environment Standard, unless otherwise subject to a rule in this Plan. h) within the building footprint, or within 2m of the outer edge of, a building that has building consent and that complies with EW-S3. This exemption does not apply to earthworks associated with retaining walls/structures which are not required for the</p>	Support in Part	Road Metals Hogan is opposed to having quarrying activities Support Rule EW-R1 and the explanatory note as drafted addressed through both the zone rules and earthworks provisions. This creates unnecessary duplication and an inconsistent approach through the different provisions	Support Rule EW-R1 and the explanatory note as drafted

structural support of the principal building on the site or adjoining site.			
---	--	--	--

NOISE:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
34	<p>NOISE-O2 Reverse sensitivity The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use and Industrial zones are not constrained by reverse sensitivity effects arising from noise sensitive activities.</p>	Oppose in Part	Reverse sensitivity effects are an appropriate consideration, particularly for activities that are lawfully established. The approach to protect activities from reverse sensitivity is supported, however we request that existing lawfully established activities also be protected.	<p>Amend NOISE-O2 to provide for lawfully established activities.</p> <p>NOISE-O2 Reverse sensitivity The Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use, <u>rural</u> and Industrial zones, <u>and other lawfully established activities</u> are not constrained by reverse sensitivity effects arising from noise sensitive activities.</p>
35	<p>NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity</p>	Oppose in Part	Road Metals requests that an additional rule addressing new sensitive activities in proximity to lawfully established quarries be added.	<p>NOISE-R12 New noise sensitive activities, alterations to existing buildings for use by a noise sensitive activity or subdivision to accommodate a noise sensitive activity</p> <p><u>3.</u></p> <p><u>Within</u></p> <p><u>a. 200m of any lawfully established excavation area</u></p> <p><u>b. 500m of any lawfully established processing area</u></p> <p><u>c. 500m of any activity that involves blasting.</u></p>

				<u>Activity status when compliance not achieved: Discretionary</u>
--	--	--	--	--

RELOCATED BUILDINGS AND SHIPPING CONTAINERS:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
36	<p>RELO-R1 Placement of a relocated building</p> <p>2. All zones except the General Industrial Zone and Port Zone</p> <p>Activity status: Controlled</p> <p>Where: CON-1 The applicant has entered into a contract with a Licensed Building Practitioner that confirms that within twelve months of the building being located on the site:</p> <p>1. the building will be permanently sited on foundations; and 2. any damage to the exterior of the relocated building will be repaired to a tradesman's like manner.</p>	Oppose	If companies have licensed building practitioners in house they may be able to undertake the work as envisaged by this rule, but without entering into a contract.	<p>Amend the rule so that works are not unnecessarily restricted in situations where a contract has not been entered into.</p> <p>RELO-R1 Placement of a relocated building</p> <p>2. All zones except the General Industrial Zone and Port Zone Activity status: Controlled</p> <p>Where:</p> <p>CON-1 The applicant has entered into a contract with a Licensed Building Practitioner that confirms that within twelve months of the building being located on the site:</p> <p>1. the building will be permanently sited on foundations; and</p>

				2. any damage to the exterior of the relocated building will be repaired to a tradesman's like manner						
37	<p>RELO-R2 Placement of a shipping container</p> <p>2. All zones except the General industrial Zone and the Port Zone</p>	Oppose	<p>This rule requires a resource consent even where the shipping container is not visible from the road. Shipping containers are regularly used as a practical and rapid solution for activities such as site offices, storage and laboratory use. Managing the effects even where these are not visible does not seem to give effect to policy RELO-P2</p>	<p>Provide a new rule RELO-R2</p> <p>2. All zones except the General industrial Zone and the Port Zone</p> <p>Activity Status: Controlled <u>Permitted</u></p> <p>Where:</p> <p>CON-1 The shipping container is either:</p> <ol style="list-style-type: none"> located more than 20m from a road boundary; or is not visible from the road; and <p>CON-2 The maximum total area of all shipping containers on the site does not exceed:</p> <table border="0"> <thead> <tr> <th><i>Site area</i></th> <th><i>Total Area of Shipping Container</i></th> </tr> </thead> <tbody> <tr> <td><10ha</td> <td>20m²</td> </tr> <tr> <td>>10ha</td> <td>20m² per 10ha of site</td> </tr> </tbody> </table> <p>And</p> <p>CON-3 There is no stacking of shipping containers.</p>	<i>Site area</i>	<i>Total Area of Shipping Container</i>	<10ha	20m ²	>10ha	20m ² per 10ha of site
<i>Site area</i>	<i>Total Area of Shipping Container</i>									
<10ha	20m ²									
>10ha	20m ² per 10ha of site									

				<p>Activity status where compliance is not achieved: <u>Restricted discretionary controlled</u></p> <p>The matters of discretion <u>control</u> are restricted to:</p> <ol style="list-style-type: none"> 1. location on the site; and 2. visibly of the shipping container beyond the boundary of the site; and 3. the exterior appearance of the shipping container; and 4. landscaping and screening; and 5. the number of shipping containers on the site and cumulative effects on visual amenity and the character of the area
--	--	--	--	---

GENERAL RURAL ZONE:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
38	<p>GRUZ-O1 Purpose of the general rural zone The General Rural Zone predominantly provides for primary production, including intensive primary production, as well as a limited range of activities that support primary production, including associated rural industry, and other activities that require a rural location.</p>	Support	Road Metals supports the explicit recognition of the role of primary production in the rural landscape.	
39	<p>GRUZ-O2 Character and qualities of the General Rural Zone The character and qualities of the General Rural Zone comprise:</p>	Support	GRUZ-O2 recognises that primary Production activities, which are appropriate in the rural environment, may generate noise, odour, light and	

	<p>1. large allotments with large areas of open space; and</p> <p>2. a working environment of mostly utilitarian buildings and structures where primary production generates noise, odour, light overspill and traffic, often on a cyclic and seasonable basis; and</p> <p>3. higher levels of amenity immediately around sensitive activities and zone boundaries; and</p> <p>4. vegetation, pasture, crops and forestry and livestock across a range of landscapes.</p>		<p>traffic.</p>	
40	<p>GRUZ-03 Protecting primary production</p> <p>The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from sensitive activities.</p>	Support	Road Metals supports the recognition that sensitive activities can affect the effectiveness of primary productive activities in the rural zone.	
41	<p>GRUZ-03 Protecting primary production</p> <p>The land resource of the General Rural Zone is not diminished by activities with no functional or operational need to locate in the General rural zone, and primary production is protected from sensitive activities.</p>	Support	Road Metals supports the recognition that sensitive activities can affect the effectiveness of primary productive activities in the rural zone.	
42	<p>GRUZ-04 Protecting sensitive activities and sensitive zones</p> <p>Intensive primary production, mining, quarrying and other intensive activities generates no or minimal adverse effects on:</p> <p>1. sensitive activities; and</p> <p>2. land close to Residential, Rural settlement, Māori Purpose and Open space zones.</p>	Oppose	Road Metals (and other companies) endeavours to avoid, remedy or mitigate adverse effects on sensitive activities and zones. Given that quarrying activities are a primary production activity that is anticipated in the rural zone, these activities should not be held to a higher standard than other activities in the zone.	<p>Amend GRUZ-04:</p> <p>GRUZ-04 Protecting sensitive activities and sensitive zones</p> <p><u>Effects from</u> Intensive primary production, mining, quarrying and other intensive activities generates no or minimal adverse effects on:</p> <p>1. sensitive activities; and</p>

				2. land close to Residential, Rural settlement, Māori Purpose and Open space zones <u>avoid, remedy or mitigate adverse effects.</u>
43	<p>GRUZ-O5 Mining and quarrying Mining and quarrying occurs in the General Rural Zone where the resource exists and where it will have no or minimal adverse effects on the sensitive environments and sensitive activities</p>	Oppose	Road Metals appreciates the recognition that quarrying is an appropriate and anticipated activity within the rural zone, and that these activities must be located where the resource exists. However, we request that these activities not be held to a higher standard than other activities that are appropriate for the zone.	<p>Amend GRUZ-O5:</p> <p>GRUZ-O5 Mining and quarrying Mining and quarrying occurs in the General Rural Zone where the resource exists and where it will have no or minimal adverse effects on the sensitive environments and sensitive activities are <u>avoided, remedied or mitigated.</u></p>
44	<p>GRUZ-P6 Mining and quarrying activities</p> <ol style="list-style-type: none"> 1. Enable small scale quarry activities (up to 2,000m²), subject to requirements to protect the environment and sensitive activities; 2. Only allow mining and other quarry activities in the General rural zone where: <ol style="list-style-type: none"> a. adverse effects on sensitive environment and sensitive activities are avoided, or if avoidance is not possible minimised; and b. adverse effects on primary production and other activities are managed in accordance with appropriate management plans; and c. vehicle access is suitable and safe, and traffic generation can be safely and efficiently accommodated by the surrounding road network; and d. adverse effects on protected rock art and archaeological sites are avoided; and e. adverse effects on local character and qualities are minimised; and 	Oppose	Road Metals agrees with the recognition that mining and quarrying are appropriate in the rural zone. The wording of this policy could be better structured to give effect to this.	<p>Amend GRUZ-P6 to give better effect to the relevant objectives, and recognise that the rural zone is the appropriate zone for them to be located in.</p> <p>GRUZ-P6 Mining and quarrying activities</p> <ol style="list-style-type: none"> 1. Enable small scale quarry activities (up to 2,000m²), subject to requirements to protect the environment and sensitive activities; 2. Only allow <u>Provide for</u> mining and other quarry activities in the General rural zone where: <ol style="list-style-type: none"> a. adverse effects on sensitive environment and sensitive activities are avoided, or if avoidance is not possible minimised; and b. adverse effects on primary production and other activities are

	<p>f. sites are progressively rehabilitated to enable the establishment of a land use consistent with the surrounding area.</p>			<p>managed in accordance with appropriate management plans; and c. vehicle access is suitable and safe, and traffic generation can be safely and efficiently accommodated by the surrounding road network; and d. adverse effects on protected rock art and archaeological sites are avoided; and e. adverse effects on local character and qualities are minimised; and f. sites are progressively rehabilitated to enable the establishment of a land use consistent with the surrounding area.</p>
45	<p>GRUZ-R16 Quarries and quarrying activities:</p> <p>1. up to 2,000m² (not in the bed of a river); and 2. in the bed of a river, which is authorised under the Regional Plan either as a permitted activity, or through a resource consent having been obtained from the Canterbury Regional Council</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The quarry is not within 10m of a site boundary; and</p> <p>PER-2 The quarry in not within 50m of a rock art site; and</p>	Oppose	<p>This rule is a further duplication of rules, and Road Metals appreciates that this rule explicitly does not require a further consent in instances where consent has already been obtained from Environment Canterbury. As per previous in this submission, the use of inert fill that does not meet the definition of “clean fill” as per the National Planning Standards should be included in this rule to avoid unnecessarily limiting the ability to rehabilitate the quarry.</p> <p>There is potential (due to wording) that extraction from river sites discretionary, this would mean a consent may be required from Timaru District Council, even though a consent has been</p>	<p>Amend GRUZ-R16 to provide more detailed information for filling with inert fill, river extraction is permitted in all cases and 250 metre distance from a sensitive activity.</p> <p><u>GRUZ-R16 Quarries and quarrying activities including backfilling with managed fill:</u></p> <p>1. up to 2,000m² (not in the bed of a river); and 2. in the bed of a river, which is authorised under the Regional Plan either as a permitted activity, or through a resource consent having been obtained from the Canterbury Regional Council</p>

	<p>PER-3 The quarry is not located within 500m of an existing sensitive activity located on another site or the boundary of any of the Residential zones, Rural lifestyle zone, Rural settlement zone, Māori Purpose zone or Open Space and recreation zones; and</p> <p>PER-4 The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks.</p> <p>Note: any associated building and structure must be constructed in accordance with GRUZ-R13.</p>		<p>furnished via Environment Canterbury.</p> <p>The distance from a sensitive receptor at 500 metres is not in common to rest of Canterbury and should reflect commonality at 250 metres.</p>	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1 The quarry is not within 10m of a site boundary; and</p> <p>PER-2 The quarry is not within 50m of a rock art site; and</p> <p>PER-3 The quarry is not located within 500 <u>250m</u> of an existing sensitive activity located on another site or the boundary of any of the Residential zones, Rural lifestyle zone, Rural settlement zone, Māori Purpose zone or Open Space and recreation zones; and</p> <p>PER-4 The Accidental Discovery Protocol commitment form, contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol, has been completed and submitted to Council, at least 2 weeks prior to the commencement of any earthworks.</p> <p>Note: any associated building and structure must be constructed in accordance with GRUZ-R13.</p>
--	--	--	---	--

<p>46</p>	<p>GRUZ-R23 Expansion of existing consented quarries</p> <p>Activity status: Restricted Discretionary</p> <p>RDIS-1 The entirety of the existing quarry operation has an existing land use consent from Timaru District Council; and</p> <p>RDIS-2 The expansion of the existing quarry does not increase: a) the rate of production beyond existing consented levels, and b) the hours of operation; and</p> <p>RDIS-3 The expansion does not occur within: a) 500m of an existing sensitive activity located on another site, or the boundary of a Residential, Rural Lifestyle, Rural Settlement, Māori Purpose or Open Space zone; or b) 20m of a site boundary; or c) 100m of a riparian margin; or d) the mapped drinking water protection overlay; or e) an outstanding natural landscape or feature, significant natural area, high naturalness water body, visual amenity landscape, the coastal environment, a site or area of significance to Māori and a heritage item or setting.</p>	<p>Oppose</p>	<p>Road Metals appreciates the recognition that lawfully established quarries should be provided for. However, for clarity we request that this rule apply to lawfully established but un-consented quarries, as well as consented ones.</p> <p>We note the term “quarry operation” has been used, and suggest this be substituted for “quarrying activity” which is a defined term.</p> <p>In terms of the recommended separation from nearby sensitive activities, we note that there is a difference in potential effects between extraction activities and processing. We suggest that the rule distinguish between these two types of activities.</p>	<p>Amend GRUZ-23 to provide for lawfully established but un-consented quarries:</p> <p>GRUZ-R23 Expansion of existing lawfully established consented quarries</p> <p>Activity status: Restricted Discretionary</p> <p>RDIS-1 The entirety of the existing quarrying <u>activity operation</u> has an existing land use consent from Timaru District Council <u>or is otherwise lawfully established</u>; and</p> <p>RDIS-2 The expansion of the existing quarry does not increase: a) the rate of production beyond existing <u>lawfully established consented</u> levels, and b) the hours of operation; and</p> <p>RDIS-3 The expansion does not occur within: a) i. <u>250</u> 500m for processing activities; and ii. 200m for any excavation activity; of an existing sensitive activity located on another site, or the boundary of a</p>
-----------	---	---------------	--	---

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. adverse effects on the visual amenity and landscape character and the location and scale of any buildings; and 2. the extent of dust nuisance, land instability, and contamination; and 3. adverse effects on the margins of water bodies; and 4. rehabilitation of the site; and 5. the commitment to implement appropriate accidental discovery protocol, in accordance with the commitment form contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol <p>Note: any associated building and structure must be constructed in accordance with GRUZ-R13.</p>			<p>Residential, Rural Lifestyle, Rural Settlement, Māori Purpose or Open Space zone; or</p> <ol style="list-style-type: none"> b) 20m of a site boundary; or c) 100m of a riparian margin; or d) the mapped drinking water protection overlay; or e) an outstanding natural landscape or feature, significant natural area, high naturalness water body, visual amenity landscape, the coastal environment, a site or area of significance to Māori and a heritage item or setting. <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. adverse effects on the visual amenity and landscape character and the location and scale of any buildings; and 2. the extent of dust nuisance, land instability, and contamination; and 3. adverse effects on the margins of water bodies; and 4. rehabilitation of the site; and 5. the commitment to implement appropriate accidental discovery protocol, in accordance with the commitment form contained within APP4 - Form confirming a commitment to adhering to an Accidental Discovery Protocol
--	--	--	--	--

				Note: any associated building and structure must be constructed in accordance with GRUZ-R13.
47	<p>GRUZ-S4 Setbacks for sensitive activities</p> <p>1) No new sensitive activity may be established within 500m from: a) the closest outer edge of any paddocks, hard-stand areas, structures or buildings used to house stock, or treatment systems, used for an intensive primary production activity; and b) an existing farm effluent disposal area; and c) a lawfully established quarry or mine.</p> <p>2) No new building for a sensitive activity may be erected within 20m from any other site boundary in a different ownership where a primary production activity is being conducted, unless the site existed prior to 22 September 2022, in which case a 10m setback applies;</p> <p>3) No new building for a sensitive activity may be erected within 20m of an existing shelter belt.</p> <p>Except that these setbacks do not apply to a new sensitive activity being established within the same site on which a lawfully established: intensive primary production activity; effluent disposal; quarry or mine; is located.</p> <p>Note: The Canterbury Regional Council regulates the discharge of contaminants into air from animal effluent in the Canterbury Air Regional Plan.</p>	Support	This standard sets out requirements for where sensitive activities can establish to avoid reverse sensitivity effects. Road Metals supports these standards, which will ensure the continuation of engineered materials ex Quarrying for long-term infrastructure projects and help avoid reverse sensitivity effects on existing quarry locations	

GENERAL INDUSTRIAL ZONE:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
48	<p>GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics Excluding any industrial ancillary activity and offensive trades</p>	Oppose	This rule permits industrial-type activities, but the definition does not cover or allow for normal requirements which would be required in a normal course of business (quarrying), where maintenance and servicing of machinery and plant is a requirement.	<p>Expand the activities covered by GIZ-R1 to include other activities appropriate in the General Industrial zone</p> <p>GIZ-R1 Industrial activity Trade supplier Laboratories Service stations Motor garage Emergency services facilities Veterinary clinics <u>transport, storage, maintenance, cleaning or repair of goods and vehicles and the hire of commercial and industrial equipment and machinery.</u> Excluding any industrial ancillary activity and offensive trades</p>

OTHER:

Submission No.	Proposed Plan Provision	Support / Oppose	Reasons For Support / Opposition	Alterations
49	<p>APP5 – Criteria for identifying significant natural areas</p>	Oppose	<p>Align Appendix 5 consistent with the NPSIB, which has set a nationally consistent framework for assessing significant natural</p> <p>The methods and criteria set out in the Timaru District Plan should be consistent with the higher direction of the NPSIB.</p>	Amend APP5 to be consistent to nationally consistent to the NPSIB

Michelle Reeves

From: Daryl McMillan <daryl@roadmetals.co.nz>
Sent: Monday, 19 December 2022 3:36 pm
To: PDP
Subject: RE: Timaru Proposed District Plan - Late Submission
Attachments: 636102-Template-Form-5-Submission-on-proposed-plan-change-or-variation.pdf;
RM TDC Submission 2022.pdf

Good afternoon,

Thank you for your advice and assistance, I do appreciate this.

Please find attached:

- Form 5
- Submission

Should you have any questions or comments, or require further information, then please do not hesitate to contact me at your convenience.

Many thanks and kind regards.

Yours faithfully,

Daryl McMillan | Compliance & Consents Manager | Road Metals Co Ltd

T 03 319 5384 | M 021 350 414 | www.roadmetals.co.nz |

ROAD METALS



This communication is confidential and may contain privileged material. If you are not the intended recipient you must not use, disclose, copy or retain it. If you have received it in error please immediately notify me by return email and destroy any electronic or paper copy of this message.

From: PDP <pdp@timdc.govt.nz>
Sent: Monday, 19 December 2022 3:21 PM
To: Daryl McMillan <daryl@roadmetals.co.nz>
Subject: RE: Timaru Proposed District Plan - Late Submission

Good afternoon Daryl,

Thank you for your late submission. This is to inform you that it is the Hearing Commissioner who determines if late submissions will be considered and they are yet to be appointed. Meanwhile, please find attached the Submission Form 5 which is required to accompany the Submission in order for it to be complete. Please fill it out and email it back with your submission. Thank you.

Regards



Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: Jane Marine <Jane.Marine@timdc.govt.nz>
Sent: Monday, 19 December 2022 3:06 pm
To: PDP <pdp@timdc.govt.nz>
Subject: FW: Timaru Proposed District Plan
Importance: High



Jane Marine | Policy Planner

Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: Claire Copeland <Claire.Copeland@timdc.govt.nz>
Sent: Monday, 19 December 2022 2:46 pm
To: Megan Geng <megan.geng@timdc.govt.nz>
Cc: Hamish Barrell <Hamish.Barrell@timdc.govt.nz>; Jane Marine <Jane.Marine@timdc.govt.nz>
Subject: FW: Timaru Proposed District Plan
Importance: High

Late submission



Claire Copeland | Executive Assistant Environmental Services

Timaru District Council | PO Box 522 | Timaru 7940
P: +64 3 687 7465 | W: www.timaru.govt.nz

From: mailroom <mailroom@timdc.govt.nz>
Sent: Monday, 19 December 2022 2:45 PM
To: Claire Copeland <Claire.Copeland@timdc.govt.nz>
Subject: FW: Timaru Proposed District Plan
Importance: High



mailroom

Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: Daryl McMillan <daryl@roadmetals.co.nz>
Sent: Monday, 19 December 2022 2:20 pm
To: mailroom <mailroom@timdc.govt.nz>
Subject: Timaru Proposed District Plan

Dear Sir / Madam

I am asking if the attached submission can be entered into the public submissions in respect to the Proposed Timaru District Plan.

I appreciate that the close off for these submissions was 15/12/22 at 1700 hours, due to health circumstances I was not able to furnish this sooner.

Should you have any questions or comments, or require further information, then please do not hesitate to contact me at your convenience.

Many thanks and kind regards.
Yours faithfully,

Daryl McMillan | Compliance & Consents Manager | Road Metals Co Ltd
T 03 319 5384 | M 021 350 414 | www.roadmetals.co.nz |



This communication is confidential and may contain privileged material. If you are not the intended recipient you must not use, disclose, copy or retain it. If you have received it in error please immediately notify me by return email and destroy any electronic or paper copy of this message.