



# FONTERRA LIMITED

## SUBMISSIONS ON THE PROPOSED TIMARU DISTRICT PLAN

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**To:** Timaru District Council  
**Submitter:** **Fonterra Limited**  
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### 1. OVERVIEW OF SUBMISSION

- 1.1. Fonterra Limited ("**Fonterra**") generally supports the direction of Timaru District Council's ("**Council**") Proposed District Plan ("**PDP**") subject to the comments which are outlined in this document.
- 1.2. Fonterra's submission relates to the whole proposal. The general and specific provisions of the proposal that Fonterra's submission relates to and the reasons for Fonterra's submission are set out below and in **Attachment A**.
- 1.3. This submission provides:
  - a. an overview of Fonterra in the Timaru District (**Section 2**);
  - b. specific comments on the Special Purpose Zone – Strategic Rural Industry (**SPZ-SRI**) sought by Fonterra (**Section 3** and **Attachments B and C**);
  - c. specific comments on the Noise Control Boundary (**NCB**) sought by Fonterra (**Section 4** and **Attachment D**);
  - d. an overall conclusion (**Section 5**).
- 1.4. I confirm that I am authorised on behalf of Fonterra to make this submission.
- 1.5. Fonterra could not gain an advantage in trade competition through this submission.
- 1.6. Fonterra wishes to be heard in support of the submission.

- 1.7. If others are making a similar submission, Fonterra will consider presenting a joint case with them at a hearing.

## 2. FONTERRA IN THE TIMARU DISTRICT

- 2.1 Fonterra owns and operates the Clandeboye manufacturing site (**Clandeboye site**) located near Temuka in the Timaru District.
- 2.2 The Clandeboye site is Fonterra's key asset within the Timaru District. The site processes up to 13 million litres of milk per day and is one of Fonterra's largest manufacturing sites, employing over 1000 staff. An image showing Fonterra's landholdings at Clandeboye is contained in **Figure 1** below.



**Figure 1: Fonterra's landholdings at Clandeboye**

- 2.3 The site has been in operation since 1904 and now processes approximately 40% of Fonterra's South Island milk into cheddar, mozzarella, whey protein concentrate, butter, whole milk powder, skim milk powder, anhydrous milk fat and milk protein concentrate.
- 2.4 More than 10,000 containers are filled each year ready to be shipped domestically, as well as internationally to more than 50 countries, including the United States, China, Algeria, Bahrain, Africa, the Middle East, Indonesia and Australia.
- 2.5 The Clandeboye operation relies heavily on the roading and rail network within the district. Temuka is a key rail hub for the unloading and loading of products which are ferried to and from the plant via trucks. Clandeboye also has a fleet of 75 tankers which pick-up and transfer milk to the plant from a wide area

within Timaru District and beyond. In total there are 118 farms in Timaru District that supply milk to the Clandeboye factory.

- 2.6 In addition to the cool and dry storage onsite, Fonterra also has third party cool store and storage facilities at the Port of Timaru and product facilities at Temuka.

### 3 STRATEGIC RURAL INDUSTRY ZONE

- 3.1 Fonterra is concerned that the proposed General Industry Zone (**GIZ**) is a poor fit for their site, in particular the zone policy framework does not account for the special characteristics of the Clandeboye site.
- 3.2 Given the nature and scale of the activities that occur at the Clandeboye site, and the essential nature of the site for the surrounding primary production, it is essential that any maintenance, repairs and minor upgrades of the site is not encumbered by uncertainty in the Plan. If the site is reliant on resource consents for almost any development or changes on-site, the development and up-grading of any plant would require considerable lead-in-time and finance to prepare applications, with the accompanying uncertainty as to whether or not any application would be successful. This continuous and ad hoc consenting creates uncertainty for the community, Council and stakeholders as to the maximum development envelope of the site.
- 3.3 A resource consent led process for the on-going development of the site, with its inherent costs and uncertainties, undermines the potential efficiency of the rural production continuum. Given the scale and economic importance of the Clandeboye site within the district and region, a primary reason for including a new zone is to reduce the time, cost and uncertainties associated with consenting maintenance, upgrading, consolidation and development of the long-established site.
- 3.4 Given the above, Fonterra considers that there is significant benefit to Council, the community and their operations, to provide for the Clandeboye site in a “specific” new zone, being the SPZ-SRI. It is anticipated that this new zone will have wider application than the Clandeboye site, although it is the responsibility of individual sites to pursue the zoning and demonstrate the need or benefit of the zone to their site and operations.
- 3.5 The proposed SPZ-SRI provisions, set out in **Attachment B**, are intended to enable the continued operation and future development of strategic rural industrial activities in the Timaru District. Additionally, the provisions would reduce reliance on resource consent processes, particularly for minor developments, by recognising that the effects of these activities, while needing to be managed, are anticipated in these specific locations. The SPZ-SRI will provide strategic rural industrial activities with both the flexibility to operate and the ability to expand existing activities, while also providing both Council and the surrounding community realistic expectations for the site in the long term.
- 3.6 The site is an established feature within the environment. It is appropriate that the Plan recognises this through providing for the continuation of this activity by way of an appropriate policy and rule framework. Although resource consents for the site have been approved previously, the GIZ policy context in the Plan does not recognise the significance of this site and activity. The GIZ policy emphasis on amenity and character creates uncertainty over time that future redevelopment and expansion will not be consented, unless there is more explicit policy support in the Plan.
- 3.7 Equally significant for this site is the need to manage (and restrict) the development of sensitive activities in close proximity to the sites. If not managed sufficiently, sensitive activities in proximity to the site have the potential to adversely impact the future operation and development of the site, with flow on effects to the community, economy and environment.
- 3.8 Inclusion of a SPZ-SRI would significantly limit, or potentially remove the need for, changes to the GIZ and related provisions to include exemptions from and amendments to provisions that are not relevant

to the site. If Fonterra's submissions seeking a new SPZ-SRI zoning for the Clandeboye site are not accepted, Fonterra seeks that alternative relief is provided through the General Industry Zone provisions of similar effect to the provisions (and exemptions) proposed for the SPZ-SRI, which may include a precinct over the land shown in Attachment C.

## 4 NOISE CONTROL BOUNDARY

- 4.1 Fonterra has worked closely with its noise consultants to develop NCBs for most of its manufacturing sites throughout New Zealand. A NCB is an effective way of managing noise (and expectations associated with noise) for a large noise generating activity. Fonterra's proposed noise management includes restrictions on sensitive activities within the NCB, and noise emission standards appropriate to the operational requirements and the environmental factors of Clandeboye site.
- 4.2 Fonterra is seeking to have the new noise provisions inserted into the Noise chapter of the PDP, as set out in **Attachment A**. The extent of the proposed NCB is provided in **Attachment D**.

## 5 CONCLUSION

- 5.1 Fonterra generally supports the PDP, subject to amendments to address a number of concerns. Fonterra considers the PDP requires amendment as set out in **Attachment A** (or amendment that would otherwise give effect to the relief which Fonterra seeks in this submission). The PDP as notified:
- a. will not promote sustainable management of resources and will not achieve the purpose of the RMA;
  - b. is contrary to Part 2 and other provisions of the RMA;
  - c. will not enable the social and economic well-being of the community;
  - d. will not meet the reasonable foreseeable needs of future generations;
  - e. will not achieve integrate management of the effects of use, development or protection of land and associated resources of the Timaru District;
  - f. will not enable the efficient use and development of Fonterra's assets and operations, and of those resources; and
  - g. does not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions in relation to other means.
- 5.2 Fonterra therefore seeks the following decision from the Council:
- a. The relief as set out above and in **Attachments A, B, C, and D**.
  - b. Any other similar relief that would deal with Fonterra's concerns set out in this submission.
  - c. Insertion of clear cross-references into other parts of the plan where appropriate.

Signed:



Dated: 15 December 2022

**ATTACHMENT A**

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
<b>PLANNING MAPS</b>				
	New Strategic Rural Industry Zone	Support	Fonterra is proposing a new SPZ-SRI for their Clandeboye site.	Amend the zoning of the land shown in <b>Attachment C</b> to Strategic Rural Industry Zone.  Alternatively, if this requested new SRIZ is not accepted, Fonterra seeks that the GIZ be extended to include all of the land shown in Attachment C.  Alternative relief may be considered by Fonterra through this process.
	Proposed General Industry Zone	Oppose	Subject to consideration of the new SPZ-SRI, Fonterra opposes the proposed GIZ of their Clandeboye manufacturing site.	Rezone the land shown in <b>Attachment C</b> with the SPZ-SRI.  Alternatively, if this requested new SRIZ is not accepted, Fonterra seeks that the GIZ be extended to include all of the land shown in Attachment C.
	Proposed General Rural Zone	Oppose	Subject to consideration of the new SPZ-SRI, Fonterra opposes the proposed General Rural Zone (GRUZ) of some of their landholding near the Clandeboye manufacturing site.	Rezone the land shown in <b>Attachment C</b> with the SPZ-SRI.  Alternatively, if this requested new SRIZ is not accepted, Fonterra seeks that the GIZ be extended to include all of the land shown in Attachment C.
	Proposed General Industry Zone	Support	Fonterra supports the General Industry zoning of 110 Donahue Road.	Retain the General Industry zoning of 110 Donahue Road.
	Proposed Height Specific Control Area	Oppose	Subject to consideration of the new SPZ-SRI, Fonterra opposes the proposed Height Specific Control Area overlay on their Clandeboye manufacturing site.	Replace the Height Specific Control Area with the SPZ-SRI.
	New Noise Control Boundary	Support	In order to effectively manage noise sensitive activities in close proximity to the Clandeboye site, Fonterra propose a new NCB overlay.	Insert new Fonterra Clandeboye NCB overlay onto the planning maps. The extent of the proposed NCB is shown in <b>Attachment D</b> .

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	Kotuku Place	Oppose	Given the role of Kotuku Place, Fonterra consider that the Regional Arterial status of Kotuku Place should be removed and the regional arterial overlay continued on Canal Road to the intersection of Canal Road / Rolleston Road / Milford Clandeboye Road.	Remove the Regional Arterial status shown on Kotuku Place and extend the Regional Arterial status along Canal Road to the intersection of Canal Road / Rolleston Road / Milford Clandeboye Road.
	Specific Control Areas – PORTZ Height Specific Control Area	Oppose	As the PORTZ Height Specific Control Area overlay has no associated rules, Fonterra considers that the control overlay can be deleted.	Delete the Port Zone Height Specific Control Area overlay.
	General Industrial zoning of 2 and 2a King St and 6 King St, Temuka	Support	Fonterra considers the proposed zoning of these Temuka sites is appropriate.	Maintain the General Industrial zoning of 2 and 2a King St and 6 King St, Temuka
<b>FOREWORD OR MIHI</b>				
	Foreword or Mihi	Support in part	The District Plan is not intended to manage activities 'so they do not affect the environment'. The District Plan is intended to manage adverse effects on the environment.	Amend the Foreword or Mihi as follows: <i>'...It provides a framework that enables expected activities and manages <u>the potential adverse effects of other activities so they do not affect on the environment.</u></i>
<b>DESCRIPTION OF THE DISTRICT</b>				
	Description of the District - Settlement Patterns, Growth and Development	Support	Fonterra supports recognition of the adverse effects (by way of reverse sensitivity effects) that rural lifestyle development has on the rural environment.	Retain as notified.
	Description of the District – Business Zones and Centres	Support	Fonterra supports recognition of the Clandeboye site.	Retain as notified.

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	Description of the District – Rural areas	Oppose in part	<p>Fonterra considers that strategic rural industry should be highlighted in this section of the Plan. Also, as drafted the Plan suggests that a ‘balance’ is required between rural lifestyle and rural activities. Fonterra does not support this and seeks amendments.</p>	<p>Amend section as follows:</p> <p><i>Rural areas are dominated by agricultural land use, with some areas of horticulture and viticulture. Farming is largely pastoral, with sheep and beef farms dominating in the steeper or higher altitude areas and dairy farms occupying much of the plains, particularly at Rangitata Island. <u>Rural industry, including strategic rural industry, has a functional and operational need to locate in rural areas to support primary production activities.</u></i></p> <p><i>In recent years, rural lifestyle blocks have gained popularity, and subdivisions to supply this property market has resulted in the fragmentation of rural land, and the loss of productive land to rural residential use. This increase in rural residential activities, and urban creep into areas that have traditionally been farmed can, in some locations, cause conflict between landowners. New residential land uses may be <u>incompatible with impacted by</u> existing farming activities <u>and rural industry</u> occurring in the working rural environment. <u>Rural lifestyle development should be restricted. A balance is needed between these activities</u> to maintain the ability of farming activities <u>and rural industry</u> to continue in a rural environment.</i></p> <p><i>Furthermore, the district contains a large proportion of high class productive, or versatile, soils. These are the soils classified as Class 1, <del>2</del> <u>2 and 3</u> under the Land Use Capability (LUC) classification system and are highly productive for a range of primary <u>production activities industries.</u> These soils tend to be concentrated around townships and urban areas because towns were</i></p>



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				<i>historically established in areas where the resources supported agriculture and growth. As a result, urban sprawl and changes in land use on the fringe of urban areas can reduce the availability of versatile soils for productive uses.</i>
<b>DEFINITIONS</b>				
	Hazardous facilities	Oppose	Fonterra does not consider that there is any need for this definition to exist, as the provisions relating to 'hazardous facilities' should be deleted.	Delete this definition (in response to amendments recommended to the chapter).
	Height	Oppose	The definition should provide for appropriate exemptions.	<p>Amend the definition as follows:</p> <p><i>means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.</i></p> <p><i><u>For the purposes of this definition, the measurement of height shall not include lift towers, stairwells, skylights, antennae, or plant rooms, chimneys, flues, flagpoles, aerials or other such projections which;</u></i></p> <p><i><u>a. do not exceed the maximum permitted height by more than 15% of the height limit for the zone,</u></i></p> <p><i><u>b. or 2.5m, whichever is the lesser; and</u></i></p> <p><i><u>c. do not exceed more than 10% of the area of the footprint of the building, or 50m<sup>2</sup>, whichever is the lesser.</u></i></p>
	Light Sensitive Areas	Oppose in part	It is inappropriate that the Rural Lifestyle Zone is protected by this definition. As a rural zone, it	Amend the definition as follows:



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			<p>should not be protected from typical rural effects, including light.</p>	<p><i>Includes land in the following areas outside of the Port Zone:</i></p> <ul style="list-style-type: none"> <li>a. <i>Wāhi tapu, Wāhi taoka and Wai taoka Overlays</i></li> <li>b. <i>Significant Natural Areas Overlay</i></li> <li>c. <i>Outstanding Natural Landscapes Overlay</i></li> <li>d. <i>Visual Amenity Landscape Overlay</i></li> <li>e. <del><i>the Rural Lifestyle Zone;</i></del> and</li> <li>f. <i>the Natural Open Space Zone.</i></li> </ul>
	<p>Noise sensitive activity</p>	<p>Oppose in part</p>	<p>Fonterra is concerned to ensure that all noise sensitive activities are captured by the definition of 'noise sensitive activities.' Community facilities are also sensitive to noise and likely to give rise to reverse sensitivity effects. Fonterra therefore seeks that 'community facilities' are included in the definition.</p> <p>The National Planning Standards define as:</p> <p><i>'means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility'.</i></p> <p>As 'community facility' is more fulsome than those activities already described in the 'noise sensitive activity' definition and provides more generally for the congregation of people it is appropriate to acknowledge 'community facility' as being sensitive to noise.</p> <p>Fonterra would also be agreeable to the term 'place of assembly' instead of 'community facility'</p>	<p>Amend as follows:</p> <p><i>Noise sensitive activity means:</i></p> <p>...</p> <p><i><u>f. Community facility</u></i></p>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
			as it is acknowledged that this is already a term defined in the PDP.	
	Regionally Significant Infrastructure	Support	Fonterra support the inclusion of the Port in the definition.	Retain the Port Zone in the Regionally Significant Infrastructure definition.
	Reverse sensitivity	Support	Fonterra supports the definition of reverse sensitivity proposed.	Retain as notified.
	Rural industry	Support	Fonterra supports the definition of rural industry proposed.	Retain as notified.
	Rural residential development	Oppose	Fonterra opposes the definition of rural residential development. The National Planning Standards provide for a Rural Lifestyle Zone (as does the PDP) and Fonterra considers that the District Plan wording regarding this category of development should be consistent. As such, all references to rural residential should be amended to rural lifestyle.	Amend the definition as follows: <i>Rural <del>residential</del> <u>lifestyle</u> development:</i> ...
	Sensitive activity	Oppose	Fonterra opposes the exception in (b), particularly that 'place of assembly' is not considered sensitive in relation to noise. Places of assembly (including community facilities) are sensitive to noise and likely to give rise to reverse sensitivity effects.  It is also noted that the numbering is confusing and needs amending.	Amend the definition as follows: <i>Sensitive activity means:</i> <ol style="list-style-type: none"><li>1. Residential activities;</li><li>2. Education facilities and preschools;</li><li>3. Guest &amp; visitor accommodation;</li><li>4. Health care facilities which include accommodation for overnight care;</li><li>5. Hospitals;</li><li>6. Marae (building only); or</li><li>7. Place of assembly.</li></ol> <i>except that:</i>

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				<p>a. <del>subclause f.6 and 7</del> above is not applicable in relation to electronic transmission</p> <p>b. <del>subclause g. above is not applicable in relation to noise or electronic transmission.</del></p>
	Strategic rural industry activities	Oppose	Fonterra considers that it is appropriate to define strategic rural industry activities.	<p>Add a definition as follows:</p> <p><i><u>Strategic rural industry activities means: any activity that is associated with the processing, testing, storage, handling, packaging or distribution of products manufactured at sites in the Special Purpose Zone – Strategic Rural Industry.</u></i></p>
	Wastewater	Support	Fonterra supports the definition of wastewater.	Retain as notified.
<b>NATIONAL DIRECTION INSTRUMENTS</b>				
	National Policy Statements and New Zealand Coastal Policy Statement	Oppose in part	This section should refer to the most recent versions of National Policy Statements. Also, the Plan should be reviewed against the National Policy Statement for Highly Productive Land 2022.	<p>Amend this section as follows:</p> <p>...</p> <p><i><u>National Policy Statement on Urban Development Capacity 2016-2020</u></i></p> <p>...</p> <p><i><u>National Policy Statement on Highly Productive Land 2022</u></i></p>
<b>STRATEGIC DIRECTION</b>				
	SD-O1	Support in part	Fonterra generally supports SD-O1 but consider that it is appropriate to recognise reverse sensitivity effects when providing for further rural lifestyle development.	<p>Amend the strategic direction as follows:</p> <p>...</p> <p><i><u>ii. limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a</u></i></p>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<p>coordinated pattern of development, <u>avoid reverse sensitivity effects on existing and permitted rural activities</u> and are capable of efficiently connecting to reticulated sewer and water infrastructure; and</p> <p>...</p>
	SD-O2	Support in part	<p>Fonterra generally supports SD-O2 but considers that reference to 'significant heritage' in point vii is vague and should be amended.</p>	<p>Amend the strategic direction as follows:</p> <p>...</p> <p><i>the important contribution of historic heritage to the District's character and identity is recognised, and <u>significant historic heritage</u> <del>and its</del> values are protected from inappropriate subdivision, use, and development.</i></p>
	SD-O3	Support	<p>Fonterra agrees that the effects of climate change need to be recognised and managed.</p>	<p>Retain as notified.</p>
	SD-O4	Support	<p>Fonterra agrees that the effects of natural hazards need to be recognised and managed.</p>	<p>Retain as notified.</p>
	SD-O5	Support in part	<p>Fonterra agrees that the needs of Kāti Huirapa should be provided for within the district. Given the rural location of the Māori Purpose Zones care should be taken to ensure that papakāinga are not located where there may be impacts on human health due to existing or permitted rural, and rural industrial, activities.</p>	<p>Amend the strategic direction as follows:</p> <p>...</p> <p><i>v. Māori reserve lands are able to be used by Kāti Huirapa for their intended purposes <u>in a manner that maintains the health and safety of their people</u>;</i></p> <p>...</p>
	SD-O6	Support in part	<p>Fonterra considers that the wording of this provision should be amended to provide for existing and new businesses.</p>	<p>Amend the strategic direction as follows:</p> <p><i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i></p>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<ul style="list-style-type: none"> <li>i. providing sufficient <u>and appropriately located</u> land <del>for to meet the operational requirements of</del> a range of <u>existing and new</u> business activities <u>and</u> to cater for projected growth;</li> <li>ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones.; <u>and</u></li> <li>iii. <u>protecting industrial land from inappropriate activities establishing within the zone and protecting the zone interface to avoid reverse sensitivity effects.</u></li> </ul>
	SD-O8	Support in part	Fonterra considers that the wording of this provision should be amended to provide for existing and new businesses.	<p>Amend the strategic direction as follows:</p> <p>...</p> <ul style="list-style-type: none"> <li>ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of <u>both</u> new development <u>and the growth of existing development</u>;</li> </ul> <p>...</p>
	SD-O9	Support in part	Fonterra considers that the wording of this strategic direction should be amended to better protect rural areas for their intended purposes.	<p>Amend the strategic direction as follows:</p> <p><del>A range of primarily productive Primary production activities are enabled in the rural environment to enable the ongoing use of land for primary production for present and future generations,</del> while:</p> <ul style="list-style-type: none"> <li>i. protecting versatile soils for productive uses;</li> <li>ii. managing the adverse effects of intensive activities on sensitive activities;</li> </ul>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<p>iii. <i>managing the adverse effects of new sensitive activities on primary production <u>and rural industry</u>;</i></p> <p>iv. <i>avoiding activities that have no functional/ or operational need to locate in the rural area;</i></p> <p>v. <i>identifying and maintaining the character, qualities and amenity values of rural areas;</i></p> <p>vi. <i>ensuring Future Development Area <u>provide for rural activities until rezoned for residential purposes.</u> <del>overlay remains available for future urban or rural lifestyle development.</del></i></p>
<b>URBAN FORM AND DEVELOPMENT</b>				
2	UFD-O1	Support in part	Fonterra considers that reference to reverse sensitivity effects ensures that the impact of sensitive activities on business is recognised (not just the effects of business, typically industry, on sensitive activities).	<p>Amend the strategic direction as follows:</p> <p>...</p> <p>x. <i>controls the location of activities, primarily by zoning, to minimise <u>reverse sensitivity effects and conflicts between incompatible activities and avoid these where there may be significant adverse effects.</u></i></p>
<b>ENERGY AND INFRASTRUCTURE</b>				
3	EI-O1	Support	It is appropriate that regionally significant infrastructure contributes to the economy, enables people and communities and aligns with development.	Retain as notified.
	EI-P1	Support	It is appropriate that regionally significant infrastructure contributes to the economy, enables people and communities and aligns with development.	Retain as notified.

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
<b>STORMWATER</b>				
4	Introduction	Support	Fonterra considers that appropriate recognition is included in the Introduction to exclude activities that hold regional consent for the discharge of stormwater.	Retain as notified.
	SW-R4	Support in part	Fonterra supports the recognition that the rule does not apply to those activities that hold regional consent(s) relating to stormwater.  However, a consequential amendment is required to account for the new SPZ-SRI proposed by Fonterra.	Amend the rule as follows:  <i>Section B: Activities in the General Industrial Zone, <u>Strategic Rural Industry Zone</u>, Port Zone and Open Space and Recreation zones</i>  Add 'Strategic Rural Industry Zone' to the left column.
<b>TRANSPORT</b>				
5	TRAN-O1	Support	It is appropriate that transport infrastructure aligns with growth and encourages sustainable economic development.	Retain as notified.
6	TRAN-P7	Support	Fonterra agrees that alternative transport modes should be encouraged (rather than mandated) as this recognises that not all high traffic generators are appropriate for alternative transport modes.	Retain as notified.
	TRAN-P8	Support in part	Fonterra does not support the requirement for landscaping of all parking areas. The policy should recognise that landscaping should be provided, where appropriate and relative to the zoning of the land.	Amend the policy as follows:  <i>Require land use activities to provide:</i>  ...  4. <i>where appropriate, landscaping in provided parking areas that visually softens the dominant effect of hard surfaces and positively contributes to amenity values <u>anticipated for the zone.</u></i>



REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	TRAN-S1	Oppose	Fonterra considers that on a site as large and visually complex as those in the SRIZ, it is unreasonable to expect amenity landscaping along a road boundary, where the new additional carparking is not visible from the road.	Amend the standard as follows: Exclude 'Strategic Rural Industry Zone' in the left column.
	TRAN-S5	Oppose	Fonterra considers that it is unnecessary to provide for cycle parking in the SRIZ given their isolated locations. In the event that cycle parking is provided, it will meet the requirements of TRAN-S6.	Amend the standard as follows: Exclude 'Strategic Rural Industry Zone' in the left column.
	TRAN-S7	Oppose	It is not necessary to make specific provision for loading on a site like those in the SRIZ, as suitable loading is inherent to the site's layout and operational requirements. When loading is provided it will comply with the requirements of TRAN-S8.	Amend the standard as follows: Exclude 'Strategic Rural Industry Zone' in the left column.
	TRAN-S20	Oppose in part	Traffic generation for development in the SRIZ will be controlled by a new provision for that zone.	Amend the standard as follows: Exclude 'Strategic Rural Industry Zone' in the left column.
<b>NATURAL HAZARDS</b>				
	NH-O1	Support in part	Fonterra considers that the objective should be amended to enable risks to be managed outside of a high-risk area (noting that 'manage' includes 'avoid, remedy or mitigate').	Amend the objective as follows: <i>Risk to human life and significant risk to property, from natural hazards is:</i>  1. <i>avoided in high hazard areas; and</i> 2. <del>avoided or mitigated</del> <i>managed elsewhere to an acceptable level.</i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	NH-P1	Support	Fonterra considers a risk-based approach is appropriate (but requests amendments to the rules to appropriately reflect this).	Retain as notified.
	NH-P4	Support	Fonterra considers it is appropriate to enable use, development and subdivision in a 0.5% AEP flood area where risks are managed.	Retain as notified.
	NH-R1	Support	Fonterra supports the risk based approach to this rule, where less risky activities are provided for as permitted activities.	Retain as notified.
	NH-R4	Support	Fonterra supports the risk-based approach to this rule, where less risky activities are provided for as permitted activities.	Retain as notified.
	NH-R7	Oppose in part	Given that the rule title provides for buildings and structures less than 30m <sup>2</sup> , the addition of PER-2 seems contradictory.	Amend the rule as follows and renumber accordingly: <i>Activity status: Permitted</i> <i>Where</i> <i>PER-1</i> <i>The building or structure or addition is below ground; or</i> <del><i>PER-2</i></del> <del><i>The new building or structure or addition has a ground floor area of less than 10m<sup>2</sup>; or</i></del> <i>PER-2</i> <i>The new building or structure or addition is located within a road corridor; or</i> <i>PER-3</i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<i>A Flood Risk Certificate for the site has been issued in accordance with NH-S1 and the certificate states that the activity is not located on land that is within an overland flow path.</i>
	NH-R8	Oppose	Fonterra considers that the activity status for the Liquefaction Awareness Areas should be amended to controlled. Fonterra understands that this rule only applies to subdivision within a Liquefaction Awareness Area and is concerned to ensure the rule remains limited to that extent.	Amend the rule as follows: <i>Activity status: <del>Restricted-Discretionary-Controlled</del></i> <i>Matters of <del>discretion control</del> are restricted to:</i>
	NH-S2	Oppose in part	Given the isolated nature of the Clandeboye site and the extent of the surrounding flood plain, it is unclear what the PDP is seeking to manage with the 2000m <sup>2</sup> threshold.	Amend the standard as follows:  <i>In the left column include (excluding the Strategic Rural Industry Zone).</i>
<b>HAZARDOUS SUBSTANCES</b>				
	Introduction	Oppose in part	Fonterra opposes the purpose of this chapter to manage 'hazardous facilities'. The use, storage, disposal and transportation of hazardous substances is controlled by other legislation, including in areas subject to natural hazards.	Amend the Introduction as follows:  <i>Hazardous substances include a variety of toxic substances such as chemicals, medical waste, petroleum products and gases. Hazardous substances are used throughout the District for many purposes, with their use, storage, and disposal being an integral and essential part of many commercial, industrial, rural and domestic activities. However, if not appropriately managed, their storage and use are potential threats to people and the environment.</i>  <i>The Hazardous Substances and New Organisms Act 1996 (HSNO) aims to protect the health and safety of people from the adverse effects of hazardous substances. The Health and Safety at Work Act 2015 (HSW) aims to protect people</i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<p>against harm to their health, safety and welfare caused by risks arising from work. These Acts provide the general framework for controlling hazardous substances during their life cycle. However, they do not take into account the sensitivity of the environment in which hazardous substances are located, or other relevant resource management issues.</p> <p>Accordingly, the District Plan addresses the following resource management matters concerning hazardous substances:</p> <ul style="list-style-type: none"> <li>• potential adverse effects on sensitive activities and sensitive environments;</li> <li>• reverse sensitivity effects caused by sensitive activities locating too close to <u>major</u> hazardous facilities;</li> <li>• <del>the risks to hazardous facilities from natural hazards and consequential risks to the environment;</del></li> <li>• cumulative effects of major hazard facilities locating too close each other.</li> </ul> <p>The adverse effects associated with these resource management issues generally have a low probability of occurring but a high potential impact if they do occur. As such and as the need to comply with the HSNO and HSW Acts significantly reduces most risks associated with hazardous substances, this chapter focuses on <u>higher risk facilities, being hazardous facilities and</u> major hazard facilities. Major Hazard Facilities are identified through the Health and Safety at Work (Major Hazard Facilities) Regulations 2016.</p> <p><u>Proposals for new Major Hazard Facilities (and additions to Major Hazard Facilities), will require a</u></p>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<del>Quantitative Risk Assessment to be provided which is prepared by a suitably qualified person. This assessment will help quantify the extent and nature of the risk. Unacceptable risks to human health are defined as an individual human fatality not greater than 1 x 10<sup>-6</sup> per year (one in a million). Where a Quantitative Risk Assessment has been prepared, sensitive activities are required to located outside of the (1 x 10<sup>-6</sup> per year) risk area, or if no such assessment exists, at least 250m away from the Major Hazard Facilities.</del>
	HS-O1	Oppose	The use, storage, disposal and transportation of hazardous substances is controlled by other legislation.  If the intention of the objective is to manage Major Hazard Facilities, the objective should be appropriately worded to reflect this.	Delete the objective.
	HS-P4	Oppose	The use, storage, disposal and transportation of hazardous substances is controlled by other legislation.	Delete the policy.
	HS-R1	Oppose	The use, storage, disposal and transportation of hazardous substances is controlled by other legislation.	Delete the rule.
<b>HISTORIC HERITAGE</b>				
	HH-O2	Support	Fonterra supports the proposed wording of this objective.	Retain as notified.
	HH-O3	Support	Fonterra supports the proposed wording of this objective.	Retain as notified.

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	HH-P3	Support	Fonterra supports the proposed wording of this policy.	Retain as notified.
	HH-P4	Support	Fonterra consider that the policy should be amended to provide for the management of effects.	Amend the policy as follows: <i>Enable the maintenance and repair of Historic Heritage Items and internal alterations <del>where that do not adversely affects on</del> the heritage values of any scheduled interior elements <u>are managed</u>.</i>
	HH-P5	Support in part	Fonterra generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend the policy as follows: <del>Only a</del> <i>Allow external alterations and additions to Historic Heritage Items, signs attached to Historic Heritage Items, or internal alterations which affect scheduled interior elements where:</i>
	HH-P6	Support in part	Fonterra generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend the policy as follows: <del>Only a</del> <i>Allow the relocation of Historic Heritage Items within or beyond their heritage setting where it can be demonstrated that:</i>
	HH-P7	Support	Fonterra generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend the policy as follows: <del>Only a</del> <i>Allow subdivision, earthworks or new buildings within the settings of Historic Heritage Items where they protect the heritage values of the items, taking into account whether:</i>
	HH-P8	Oppose in part	Fonterra opposes this policy and consider that it is important that reference is also made to the values of the heritage item and the effect of the loss of these.	Amend the policy as follows: <del>Only a</del> <i>Allow demolition of a Category B Historic Heritage Item identified in SCHED3 – Schedule of Historic Heritage Items where it can be demonstrated that:</i>  ...

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<u>5. the heritage values identified for the item are already degraded or lost.</u>
	HH-R1	Support	Fonterra supports the proposed wording of this rule as it is appropriate to provide for maintenance, repair and internal alterations.	Retain as notified.
	HH-R2	Support	Fonterra supports the proposed wording of this rule as it is appropriate to provide for temporary activities in a heritage setting.	Retain as notified.
	HH-RNEW	Oppose	Fonterra considers that 'official signs' should be provided for as a permitted activity.	Include a new rule with a permitted activity status to provide for official signs on a heritage item.
	HH-RNEW	Support	Fonterra consider that a new controlled activity rule should be included to provide for new buildings, structures and signs within a Category B heritage setting.	<p>Insert a new rule as follows:</p> <p><u>New buildings, structures and signs (other than official signs) within a Category B heritage setting</u></p> <p><u>Activity status: Controlled</u></p> <p><u>Matters of control are restricted to:</u></p> <ol style="list-style-type: none"> <li>1. <u>compatibility of the form, scale, design and materials of the new building, structure or sign with the historic heritage item, its identified values and its setting; and</u></li> <li>2. <u>location of the new building, structure or sign with particular regard to whether it obstructs sightlines that are critical to an appreciation of the heritage values of the item(s); and visibility from public spaces; and</u></li> <li>3. <u>relationship with other elements with the heritage setting including ancillary structures, plantings and access.</u></li> </ol>



REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	HH-R3	Support in part	Fonterra considers that this rule should be amended to only apply to Category A heritage items.	Amend the rule as follows: <i>New buildings, structures and signs (<u>other than official signs</u>) within a <u>Category A</u> heritage setting</i>
	HH-RNEW	Support	Fonterra consider that a new controlled activity rule should be included to provide for earthworks in a Category B heritage setting.	Insert a new rule as follows: <i><u>Earthworks within a Category B heritage setting</u></i> <i><u>Activity status: Controlled</u></i> <i><u>Matters of control are restricted to:</u></i> <i>1. <u>the values of the heritage item and the impacts of the earthworks on those values and</u></i> <i>2. <u>the scale, nature, extent and timing of the earthworks;</u></i> <i>3. <u>any measures proposed to mitigate adverse effects associated with the earthworks on the heritage item;</u></i> <i>4. <u>the commitment to implementation of an Accidental Discovery Protocol, in accordance with a commitment form contained within APP4 – Form confirming a commitment to adhering to an Accidental Discovery Protocol.</u></i>
	HH-R4	Support in part	Fonterra considers that this rule should be amended to only apply to Category A heritage items.	Amend the rule as follows: <i>Earthworks within a <u>Category A</u> heritage setting</i>
	HH-RNEW	Support	Fonterra consider that a new controlled activity rule should be included to provide for external strengthening of a Category B heritage item.	Insert a new rule as follows: <i><u>External strengthening of a Category B Historic Heritage Item</u></i> <i><u>Activity status: Controlled</u></i> <i><u>Matters of control are restricted to:</u></i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<ol style="list-style-type: none"> <li>1. <u>methodologies, design, form and materials used to protect and maintain heritage values of the heritage item, including integration with and connection to other parts of the item during and after strengthening works; and</u></li> <li>2. <u>how it is proposed to document changes to the heritage item during the course of works and on completion of the strengthening; and</u></li> <li>3. <u>the necessity of the work to achieve seismic resilience and ongoing use.</u></li> </ol>
	HH-R5	Support in part	Fonterra considers that this rule should be amended to only apply to Category A heritage items.	Amend the rule as follows: <i>External strengthening of a <u>Category A</u> Historic Heritage Item</i>
	HH-RNEW	Support	Fonterra consider that a new restricted discretionary activity rule should be included to provide for signs (not including official signs) on Category B heritage items.	Insert a new rule as follows: <u>Signs attached to a <u>Category B</u> Historic Heritage Item, excluding official signs</u> <u>Activity status: Restricted discretionary</u> <u>Matters of discretion are restricted to:</u> <ol style="list-style-type: none"> <li>1. <u>any impact on heritage values; and</u></li> <li>2. <u>any positive effects of the sign</u></li> </ol>
	HH-R6	Oppose in part	Fonterra considers that 'official signs' attached to heritage items should be permitted activities. Furthermore, Fonterra considers that this rule should be amended to only apply to Category A heritage items.	Amend the rule as follows: <i>Signs attached to a <u>Category A</u> Historic Heritage Item, <del>excluding official signs</del> external alterations and additions to a heritage item</i>
	HH-RNEW	Oppose	Fonterra considers that a new rule should provide for external additions and alterations to a Category	Amend the rule as follows:

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
			B heritage item as a restricted discretionary activity.	<p><u>External alterations and additions to a Category B heritage item (excluding strengthening)</u></p> <p><u>Activity status: Restricted Discretionary</u></p> <p><u>Matters of discretion are restricted to:</u></p> <ol style="list-style-type: none"> <li>1. <u>methodologies, design, form and materials used to protect and maintain heritage values of the heritage item, including integration with and connection to other parts of the item during and after works; and</u></li> <li>2. <u>how it is proposed to document changes to the heritage item during the course of works and on completion of the works; and</u></li> <li>3. <u>the necessity of the work to achieve ongoing use.</u></li> </ol>
	HH-R7	Support in part	Fonterra considers that external alterations and additions to Category B heritage items should be provided for as a restricted discretionary activity (rather than discretionary). Accordingly, amendments are required to R7.	<p>Amend the rule as follows:</p> <p><u>External alterations and additions to a <b>Category A</b> heritage item (excluding strengthening)</u></p>
	HH-R8	Support	Fonterra supports the activity status and proposed wording of this rule as it is appropriate to provide for relocation.	Retain as notified.
	HH-R9	Support	Fonterra supports the activity status and proposed wording of this rule as it is appropriate to provide for demolition.	Retain as notified.
	HH-R10	Oppose	Fonterra considers that subdivision involving a heritage item can be provided for as a restricted discretionary activity.	<p>Amend the rule as follows:</p> <p><del>Activity status: Discretionary</del></p> <p><u>Activity status: Restricted Discretionary</u></p>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<p><i>Matters of discretion are restricted to:</i></p> <ol style="list-style-type: none"> <li>1. <i>Whether the subdivision maintains the heritage setting;</i></li> <li>2. <i>Whether the subdivision would result in a disconnect with adjoining sites that assists in heritage interpretation; and</i></li> <li>3. <i>Whether sufficient area is achieved on the balance site to comply with the zone standards and avoid adversely affecting the heritage item.</i></li> </ol>
<b>SITES AND AREAS OF SIGNIFICANCE TO MĀORI</b>				
	SASM-R1	Oppose	Fonterra considers that a specific exemption should be provided for earthworks at the Clandeboye site due to the heavily modified nature of the site.	<p>Amend the rule as follows:</p> <p>In the left column add <i>(excluding the Māori Purpose Zone and the Strategic Rural Industry Zone (Clandeboye) in SASM-5)</i></p>
<b>VERSATILE SOIL</b>				
	Whole chapter	Oppose	Fonterra consider that the PDP needs to be amended to give effect to the National Policy Statement for Highly Productive Land 2022 (NPSHPL).	Amend the PDP to give effect to the NPSHPL.
	VS-P2	Support	Fonterra supports the recognition activities that have a functional or operational need to locate on versatile soils.	Retain as notified.
<b>SUBDIVISION</b>				
	SUB-O1	Oppose in part	Fonterra considers that the objective should be more explicit in relation to reverse sensitivity effects.	<p>Amend the objective as follows:</p> <p><i>New subdivisions will:</i></p>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				... 10. not intentionally prevent, hinder or limit the <u>use or</u> development of adjoining or adjacent land, <u>including by way of reverse sensitivity effects.</u>
	SUB-O3	Oppose in part	Fonterra considers that the objective should be more explicit in relation to reverse sensitivity effects.	Amend the objective as follows: Subdivision in the rural zones will: ... 4. <u>minimise avoid</u> reverse sensitivity effects on <u>intensive</u> primary production <u>and rural industry.</u>
	SUB-P3	Oppose in part	Fonterra considers that the policy should be more explicit in relation to reverse sensitivity effects.	Amend the policy as follows: Avoid subdivisions that <u>are intended to</u> prevent, hinder or limit the <u>use or</u> development of adjoining or adjacent land, <u>unless it is done to comply with a Council approved Development Area Plan.</u> <u>including by way of reverse sensitivity effects.</u>
	SUB-P5	Oppose in part	Fonterra considers that the policy should be more explicit in relation to reverse sensitivity effects.	Amend the policy as follows: Only allow subdivision that does not result in reverse sensitivity effects that would compromise the operation of regionally significant infrastructure/facilities, <u>and legally established intensive</u> primary production <u>and rural industry.</u>
	SUB-P14	Support	Fonterra supports the policy as proposed.	Retain as notified.
	SUB-P15	Oppose in part	Fonterra considers that the objective should be more explicit in relation to reverse sensitivity effects.	Amend the policy as follows: Require subdivision in the Rural Lifestyle Zone to: ...

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<i>5. avoid reverse sensitivity effects on existing or permitted primary production and rural industry activities.</i>
9	SUB-S1.3	Support	Fonterra considers that a 40ha minimum lot size in the General Rural Zone is appropriate.	Retain as notified.
<b>COASTAL ENVIRONMENT</b>				
	CE-O6	Support	Fonterra considers that it is appropriate to provide for existing urban activities.	Retain as notified.
	CE-P9	Support	Fonterra considers that it is appropriate to provide for appropriately sized and located structures in the coastal environment.	Retain as notified
10	CE-P10	Support in part	Fonterra supports the recognition that some activities have a functional need to locate in areas with coastal environment.	Amend the policy as follows: <i>Enable subdivision, use and development outside of areas of coastal high natural character that:</i> ... <i>(a) in rural zoned areas, buildings and structures for non-intensive primary production, <u>rural industry</u> and residential activities may be appropriate depending on their size, scale and nature;</i>
12	CE-R4	Support	It is appropriate to provide for buildings, structures and extensions in the coastal environment overlay as a permitted activity.	Retain as notified.
	CE-R6	Support	Fonterra considers it is appropriate to provide for land disturbance as a permitted activity.	Retain as notified.

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
13	CE-S1	Support	Fonterra considers that the permitted height of structures is appropriate.	Retain as notified.
14	CE-S2	Support	Fonterra considers that the permitted site coverage is appropriate.	Retain as notified.
<b>EARTHWORKS</b>				
	EW-S1	Oppose	Fonterra considers that the scale and isolation of the Clandeboye site means that earthworks at the site should be unrestricted. In the event that significant earthworks are carried out, these will be managed by way of a Regional Council resource consent process.	<p>Amend the standard as follows:</p> <p>Add the Strategic Rural Industry Zone to the left column.</p> <p><i>The area of earthworks must be limited to as follows:</i></p> <ol style="list-style-type: none"> <li>1. <i>for any primary production activity that is a Permitted Activity in the zone, there is no limit; and</i></li> <li>2. <i>for any ancillary rural earthworks, there is no limit; <del>and</del></i></li> <li>3. <i>for other activities: 2,000m<sup>2</sup> in any 12-month period per site; <del>and</del></i></li> <li>4. <i><u>for any Permitted Activity in the Strategic Rural Industry Zone, there is no limit.</u></i></li> </ol>
<b>DRINKING WATER PROTECTION</b>				
	DWP-R5	Oppose	Fonterra does not consider it appropriate for existing activities, or the expansion of existing activities, which have had no impact on drinking water supply to be classified as a non-complying activity.	<p>Delete the rule.</p> <p>Alternatively, if this requested amendment is not made, Fonterra seeks that the SRIZ be excluded from the rule.</p>



REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
<b>LIGHT</b>				
	LIGHT-O1	Support	It is appropriate that lighting is provided that responds to the different zone amenities.	Retain as notified.
	LIGHT-O2	Support	It is appropriate that the benefits of lighting are recognised.	Retain as notified.
15	LIGHT-P1	Support	It is appropriate to provide for artificial lighting that ensures safety and supports economic wellbeing.	Retain as notified.
	LIGHT-P3	Support	Fonterra supports the exemption of lighting to meet the health and safety needs of people.	Retain as notified.
	LIGHT-R1.1	Oppose in part	Fonterra consider a consequential change is needed to reflect the new LIGHT rule proposed to specifically address the SPZ-SRI.	Amend the rule as follows: In the left column add <i>All zones other than Port Zone and the Strategic Rural Industry Zone outside Light Sensitive Areas.</i>
	LIGHT-R1.2	Oppose in part	The Port Zone is a 24-hour port operation and in such circumstances, lighting is an important health and safety feature. The rule should be directed at ensuring such lighting is directed away from residential properties rather than properties associated with Industrial or Port Activities within the Port Zone.	Amend the rule as follows: <i>Activity status: Permitted</i> <i>Where:</i> <i>PER-1</i> <i>All exterior lighting must be oriented so that light is emitted away from any adjoining and adjacent <del>zones</del> <del>properties</del>; and</i>
	LIGHT-RNEW	Support	Fonterra considers that lighting exemptions comparable to the Port Zone provisions (LIGHT-R1.2) should also apply to the Fonterra site.	Insert new rule as follows: <i>Rule LIGHT-R1.3</i> <i>Strategic Rural Industry Zone</i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<p><i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>PER-1</i></p> <p><i>All exterior lighting must be oriented so that light is emitted away from any adjoining and adjacent zone; and</i></p> <p><i>PER-2</i></p> <p><i>LIGHT S-2 is complied with; and</i></p> <p><i>PER-3</i></p> <p><i>The horizontal and vertical illuminance levels (above the background level) at the notional boundary of the General Rural Zone between 10pm – 7am do not exceed 5 lux; and</i></p> <p><i>PER-4</i></p> <p><i>The vertical illuminance level at a window of an adjoining property in the General Rural Zone between 10pm and 7am does not exceed 5 lux.</i></p>
	LIGHT-S1	Support	Fonterra supports the exemption of the Port Zone from LIGHT-S1 General lighting standards. Fonterra considers the exemption should also apply to the SRIZ.	Amend the rule as follows: In the left column add <i>All zones (excluding Port Zone <u>and the Strategic Rural Industry Zone</u>)</i>
	TABLE 23	Support in part	Fonterra considers it is appropriate to add the SRIZ to Table 23.	Amend Table 23 to add the Strategic Rural Industry Zone to the right column.
<b>NOISE</b>				
16	Introduction	Oppose	It is important that key industry and employment generators are recognised as being constrained by	Amend the Introduction as follows: <i>...This is a particular concern for <u>key industry and employment generators</u>, important services and</i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
			reverse sensitivity effects arising from inappropriately located sensitive activities.	<i>community facilities, including the Airport, Raceway, State Highway, Railway Corridor and the Port, which could be constrained if reverse sensitivity effects arise...</i>
17	NOISE-O1	Support	It is considered appropriate that noise effects are appropriate to the zone.	Retain as notified.
18	NOISE-O2	Support	Fonterra consider that the SPZ-SRI is explicitly recognised in this objective. Furthermore, it is considered more appropriate for reverse sensitivity effects to be avoided.	Amend the objective as follows: <i>The Airport, Raceway, State Highway, railway lines, <del>and the Port,</del> <u>the Strategic Rural Industry Zone</u> and activities located within commercial, mixed use and Industrial zones are <u>protected from not constrained by</u> reverse sensitivity effects arising from noise sensitive activities.</i>
	NOISE-P1	Support	It is considered appropriate that noise effects are appropriate to the zone.	Retain as notified.
	NOISE-P5	Support in part	This policy does not relate to reverse sensitivity, rather it relates to effects on incompatible activities. Accordingly, the policy title should be amended.  Fonterra supports the reference to the Port Noise Inner Control Boundary Overlay.  The new Clandeboye Noise Control Boundary needs including in this policy to ensure that the new noise controls are tied to appropriate policy.	Amend the policy as follows:  <del>Reverse sensitivity-Effects on incompatible activities</del>  <i>Require noise sensitive activities located in higher noise environments to be located and designed so as to minimise adverse effects on the amenity values and health and safety of occupants and minimise sleep disturbance from noise, while taking into account:</i>  ...  <i>For the purpose of this Policy, higher noise environments include:</i>  ...

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<u>4. that part of the General Rural Zone located within the Clandeboye Noise Control Boundary.</u>
	NOISE-P7	Support in part	Fonterra supports the reference to the Port Noise Inner Control Boundary Overlay, however it also seeks that the proposed Clandeboye Noise Control Boundary be included in the Policy. It is important that noise sensitive activities do not result in reverse sensitivity effects on operations at the Clandeboye manufacturing site.	Amend the policy as follows:  <i>Within the Airport Noise Control Boundary Overlay, <u>Clandeboye Noise Control Boundary</u>, Port Noise Inner Control Boundary Overlay...</i>
	NOISE-RNEW	Support	Fonterra has worked closely with its noise consultants to develop a NCB for its manufacturing sites throughout New Zealand. A NCB is an effective way of managing noise (and expectations associated with noise) for a large noise generating activity. Fonterra's proposed noise management includes restrictions on sensitive activities within the NCB, and noise emission standards appropriate to the operational requirements and the environmental factors of Clandeboye. Fonterra is seeking to have the new noise provisions inserted into the Noise chapter of the PDP.	Add the following rule:  <u>Noise from the Fonterra Clandeboye manufacturing site</u>  <u>PER-1</u>  <u>On the Clandeboye manufacturing site, noise from operations, including all ancillary equipment, maintenance activities, and operation of all vehicles on site (including those entering and exiting the site), shall not exceed the following limits when measured at or beyond the Noise Control Boundary:</u>  <u>Weekdays and Weekends</u>  <u>7am – 10pm 55dBLAeq (15 min)</u>  <u>10pm – 7am 45 dB LAeq (15 min) and 75 LAFmax</u>  <u>Noncompliance with this requirement shall restrict the exercise of its discretion to the operational requirements of the site, and the effect of noise on adjoining sensitive activities within the Noise Control Boundary.</u>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	NOISE-R8	Support in part	Fonterra supports this rule but notes that part of the Port Zone (to the south) is not covered by either of the noise control boundaries and therefore no rule appears to apply. It is considered a further permitted status is required.	Add the following rule <i>PER-4</i> <i>For any activity within the Port zone but outside of the Port Noise Control Boundaries shown on the planning maps, the following noise limit applies:</i> <i>on any day between 10pm to 7am the following day, noise generated must not exceed 45 dB LA<sub>eq</sub> (9 hours) when measured at or within any residentially zoned site, provided that any single 15 minute sound measurement level must not exceed 50 dB LA<sub>eq</sub> and 75 dB L<sub>Amax</sub>.</i>
	NOISE-R9	Oppose in part	Fonterra considers that the Clandeboye NCB should be provided for in R9. Furthermore, that a non-compliance with NOISE-R9 should result in a non-complying status.	Amend the rule as follows: Add 'Clandeboye Noise Control Boundary' to the left column. <i>Activity status when compliance not achieved with PER-1.1 or PER-2: <u>Non-complying Restricted Discretionary</u></i> <i>Matters of discretion are restricted to:</i> <i>1. <del>the matters of discretion of any infringed standard.</del></i> <i>2. <del>for activities in breach PER-2, the matters of discretion of NOISE-S3</del></i>
	NOISE-S3	Oppose in part	Given that NOISE-S3 only relates to NOISE-R9, and Fonterra are seeking that the non-compliance status be amended to non-complying (rather than restricted discretionary), it is not necessary to list the matters of discretion.	Delete the matters of discretion from the standard.
	NOISE-S4	Oppose in part	Given that NOISE-S4 only relates to NOISE-R9, and Fonterra are seeking that the non-compliance	Delete the matters of discretion from the standard.

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
			status be amended to non-complying (rather than restricted discretionary), it is not necessary to list the matters of discretion.	
	Table 24 – Noise performance standards Clauses 1b and 2	Oppose	Clauses 1b and 2 appear to have missed the fact that the Port Zone extends south to the south where it is opposite but separated from General and Medium Density Residential Zones.	Amend clauses 1b and 2 in Table 24 as follows:  <i>1b. Within any part of a site in the General Residential Zone <u>except that this standard shall not apply to noise generated from within the Port Zone.</u></i>  <i>2. Within any part of a site in the Medium Density Residential Zone, <del>but</del>, <u>except that this standard shall not apply to where noise is generated from within the Port Zone, excluding those sites located between the Terrace and the Main South Railway Line.</u></i>
	Table 24 – Noise performance standards	Support	Clause 4 indicates that it is the intention of the Plan to address noise from the Port Zone separately.	Retain as notified.
<b>SIGNS</b>				
20	SIGN-O1	Support	It is appropriate to recognise the benefits of signage to the district.	Retain as notified.
21	SIGN-P1	Support	It is appropriate that signs are generally enabled, but their effects (relative to the zone) are managed.	Retain as notified.
	SIGN-R1	Support	Fonterra supports the activity status of official signs.	Retain as notified.

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
22	SIGN-R4	Support in part	The permitted activity status and parameters are considered appropriate. Fonterra considers that the SRIZ should be added to SIGN-R4.3	Amend the rule as follows: Add 'Strategic Rural Industry Zone' to the left column (R4.3 along with the GIZ and PORTZ)
	SIGN-S3	Support in part	The permitted activity status and parameters are considered appropriate. Fonterra considers that the SRIZ should be added to SIGN-S3.2.	Amend the standard as follows: Add 'Strategic Rural Industry Zone' to the left column (S3.2 along with the GIZ and PORTZ)
	SIGN-S4	Support in part	The permitted activity status and parameters are considered appropriate. Fonterra considers that the SRIZ should be added to SIGN-S4.6.	Amend the standard as follows: Add 'Strategic Rural Industry Zone' to the left column (S4.6 along with the GIZ and PORTZ)
23	SIGN-S6	Support in part	The permitted activity status and parameters are considered appropriate. Fonterra considers that the SRIZ should be added to SIGN-S6.1	Amend the standard as follows: Add 'Strategic Rural Industry Zone' to the left column (S6.1 along with the GIZ and PORTZ)
<b>GENERAL RURAL ZONE</b>				
	GRUZ-01	Support	It is appropriate that the General Rural Zone provides for primary production and activities that support primary production, such as rural industry.	Retain as notified.
	GRUZ-03	Support in part	It is appropriate to protect primary production from sensitive activities. This protection should also be afforded to rural industry that is located in the general rural zone.	Amend the objective as follows: <i>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 <del>is</del> and rural industry are protected from sensitive activities.</i>



REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
	GRUZ-P7	Support in part	Fonterra generally supports the proposed wording of this policy but considers that the word 'only' should be deleted.	Amend the policy as follows: <del>Only a</del> Allow rural industries and other activities (not listed in the rules) in the General Rural Zone where: ...
	GRUZ-PNEW	Support	Fonterra's Clandeboye site is surrounded by rural land. It is important that subdivision, use and development does not constrain Clandeboye's operations through reverse sensitivity effects.	Add new policy as follows: <i>Reverse sensitivity</i> <i>Subdivision, use and development in rural areas must avoid adverse reverse sensitivity effects on strategic rural industrial activities.</i>
	GRUZ-R21	Support	Fonterra consider it is appropriate to provide for rural industry activities as restricted discretionary activities.	Retain the rule as notified.
24	GRUZ-S4	Oppose in part	Fonterra considers that it is appropriate that sensitive activities are setback 500m from its irrigation farms. Specifically, Fonterra holds regional resource consents to irrigate process wastewater to land on (Fonterra owned) farms near the Clandeboye manufacturing site. This irrigation activity has the potential to give rise to perceived amenity effects at times and an increased building setback from boundaries will ensure that effects on neighbouring properties are acceptable.	Amend the standard as follows: 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. d. <u>The boundary of any area used for the discharge of wastewater irrigation</u>
<b>GENERAL INDUSTRIAL ZONE</b>				

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
25	Introduction	Support	The Introduction appropriately summarises the purpose and character of the General Industrial Zone.	Retain as notified.
26	GIZ-O1	Support	It is appropriate to define the purpose of the zone.	Retain as notified.
	GIZ-O2	Support	It is appropriate to define the character and qualities anticipated for the zone and enable activities that have these characters and qualities.	Retain as notified.
	GIZ-O3	Support	It is appropriate to define the use and development anticipated for the zone, in particular the need to ensure that the zone is not compromised by the establishment of sensitive activities.	Retain as notified.
	GIZ-P1	Support	It is appropriate to define the types of activities anticipated in the zone.	Retain as notified.
27	GIZ-P3	Oppose in part	While Fonterra acknowledges that the amenity of the zone should be maintained, it is important that the purpose of the zone is not undermined by maintaining the amenity for adjoining zones.	Amend the policy as follows:  <i>Maintain the amenity of the zone, while providing additional controls at the road boundary and zone boundary to manage the zone interface. values of the streetscape, the Residential Zones, and Open Space and Recreation Zones, by requiring:</i>  <i>1. storage areas to be screened from road boundaries and Residential Zones; and</i> <i>2. landscaping along road boundaries and boundaries that adjoining the Open Space and Recreation Zones; and</i> <i>3. buildings and structures to be a height and setback that will ensure adjoining Residential zones and Open Space and Recreation Zones:</i> <i>a. have a reasonable standard of sunlight access; and</i>

REF	PROVISION	SUPPORT / OPPOSE	COMMENT	RELIEF SOUGHT
				<del>b. are not unreasonably dominated by built form; and</del> <del>c. maintain privacy of adjoining Residential Zones; and</del> 4. <del>buildings to be a colour and reflectivity that does not detract from the amenity of Residential Zones.</del>
	GIZ-P6	Support	It is appropriate that 'other activities' are tightly controlled so as not to undermine the purpose of the GIZ.	Retain as notified.
28	GIZ-S2	Oppose in part	The Fonterra Clandeboye manufacturing site includes buildings (and may require further buildings in the future) that exceed the permitted height limit. The revision to the S2.2 is based on the current maximum building height on the site.	Amend the standard as follows: <i>Buildings and structures must not exceed a maximum height of <del>35m</del> <u>55m</u> measured from ground level.</i>
	GIZ-S3	Support	Fonterra considers a 3m setback in the GIZ is appropriate.	Retain as notified.
29	GIZ-S6.1	Oppose	Fonterra does not consider that a 3m landscape strip is effective to mitigate against the scale of activities existing and anticipated on the site. Furthermore, Fonterra consider that birds are problematic from a milk processing / sanitation perspective and seek to avoid nesting opportunities on the site.	Amend GIZ-S6.1 as follows: In the left column include <i>(excluding the Height Specific Control Area).</i>
<b>PORT ZONE</b>				

<b>REF</b>	<b>PROVISION</b>	<b>SUPPORT / OPPOSE</b>	<b>COMMENT</b>	<b>RELIEF SOUGHT</b>
	PORTZ-O1	Support	The proposed wording is considered appropriate.	Retain the objective as notified.
	PORTZ-P1	Support	The proposed wording is considered appropriate.	Retain the policy as notified.
	PORTZ-R3	Support	The proposed wording is considered appropriate.	Retain the rule as notified.
	PORTZ-S1	Support	The proposed wording is considered appropriate.	Retain the standard as notified.

## Attachment B – Proposed Special Purpose Zone – Strategic Rural Industry

### Introduction

The Strategic Rural Industrial Zone provides for *strategic rural industrial activities* that require a rural location because they directly support or are dependent on primary production. The rural environment also has suitable land available at a scale required for these significant activities. The establishment of these sites in the rural environment is strategic. For example, the Fonterra Clondeboye site relies on several hundred hectares of farmland to enable the sustainable discharge of its process wastewater.

The sites in the Strategic Rural Industry Zone are strategic because, in addition to their significance in terms of providing essential employment and services to the District, they may also be of regional or national importance due to their functions, the area served, the investment in infrastructure required for the establishment or on-going development of the activity, or their contribution to the economy.

Due to their strategic importance, it is important that activities in the Strategic Rural Industry Zone are encouraged to continue to operate and develop, while acknowledging the potential for such industries to impact on surrounding rural activities due to the scale of their operations and nature of effects. Noise sensitive activities seeking to establish near the sites also need to be managed to avoid the potential for reverse sensitivity effects.

Objectives	
SRIZ-O1	Purpose of the Rural Industrial Zone
The Strategic Rural Industrial Zone provides for strategic rural industrial activities that support or are dependent on primary production.	
SRIZ-O2	Character and qualities of the Rural Industrial Zone
<p>The Strategic Rural Industrial Zone is characterised by the following qualities and built form aspects:</p> <ul style="list-style-type: none"> <li>• contains utilitarian buildings on large sites; and</li> <li>• accommodates activities that generate large volumes of light and heavy vehicle traffic and which may generate objectionable odour, dust and noise; and</li> <li>• is easily accessible by vehicles from major transport routes and centres; and</li> <li>• provides a safe and functional working environment; and</li> <li>• retains a baseline level of streetscape amenity; and</li> <li>• the zone is reliant on the surrounding rural area to sustainably discharge process wastewater.</li> </ul>	
SRIZ-O3	Protection from incompatible activities

The purpose, character and qualities of the Strategic Rural Industrial Zone are not compromised by incompatible activities.	
SRIZ-O4	RIZ-O4: Benefits of strategic rural industrial activities
Recognise the social and economic benefits of strategic rural industry activities by ensuring that their operational requirements are met while managing adverse effects on the environment.	

Policies	
SRIZ-P1	Strategic rural industrial activities
Enable the continued operation and development of strategic rural industry activities and ancillary activities that are compatible with and complementary to the purpose, character and qualities of the Strategic Rural Industrial Zone.	
SRIZ-P2	Scale and location of built form
Enable buildings and structures in the Strategic Rural Industry Zone that support the operational requirements of rural industry activities.	
SRIZ-P3	Impacts of rural industry activities
Manage the effects of strategic rural industrial activities, while recognising that they generate higher noise, odour and traffic volumes and have greater lighting requirements to meet their operational requirements.	
SRIZ-P4	Reverse sensitivity
Allow strategic rural industrial activities to operate without being compromised by reverse sensitivity.	

Rules	
SRIZ-R1	Strategic rural industrial activities and ancillary activities

<p>SRIZ</p>	<p>Activity status: Permitted</p> <ol style="list-style-type: none"> <li>1. Any activity that is associated with the Strategic Rural Industry Zone, including the processing, testing, storage, handling, packaging or distribution of product.</li> <li>2. Any ancillary activity, limited to: <ol style="list-style-type: none"> <li>a. Rail infrastructure and rail activities required for the transportation of product the rural industry activity.</li> <li>b. Infrastructure for roading, wastewater, sewerage, stormwater, water supply, energy generation, or car parking.</li> <li>c. Any laboratory or facility for research and development related to the rural industry activity.</li> <li>d. Any office or facility required for the administration and management of the rural industry activity, and the marketing, sales, and distribution of products from the rural industry activity.</li> </ol> </li> </ol> <p>Where: PER-1 SRIZ-S1, SRIZ-S2 and SRIZ-S3 are complied with.</p>	<p>Activity status where compliance not achieved with PER-1: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>• the matters of discretion of any infringed standard.</li> </ul>
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SRIZ-R2

New buildings and additions to buildings

SRIZ

Activity status: RDIS

1. New buildings and additions that increase trip generation by more than 50%.

Where:

A basic ITA is provided (as defined by TRAN-R8)

Matters for discretion:

2. The exercise of discretion in relation to SRIZ-R2 is restricted to the following matters:
  - a. safety and efficiency
    - i. the extent to which the provision of access and on-site manoeuvring areas associated with the activity including vehicle loading and servicing deliveries, affects the safety, efficiency, and accessibility of the site (by all modes including for people whose mobility is restricted), and land transport infrastructure (including considering the road classification of the frontage road); and

Activity status where compliance not achieved:

When compliance with any of DPZ R3.1 is not achieved: DIS



	<ul style="list-style-type: none"> <li>ii. any mitigation proposed.</li> </ul> <ul style="list-style-type: none"> <li>b. design and layout <ul style="list-style-type: none"> <li>i. the extent to which the design and layout of the proposed activity maximises opportunities, to the extent practicable, for travel other than by private car, including providing safe and convenient access for travel by such modes; and</li> <li>ii. any mitigation proposed.</li> </ul> </li> </ul>	
SRIZ-R3	Any other industrial activity	
SRIZ	Activity status: DIS	
SRIZ-R4	Any other activity	
SRIZ	Activity status: NC	

Standards		
SRIZ-S1	Maximum height	
SRIZ	The maximum <u>height</u> of buildings must not exceed 55m.	Matters of discretion are restricted to: <ol style="list-style-type: none"> <li>1. dominance in the landscape; and</li> <li>2. solar access to neighbouring properties; and</li> <li>3. landscaping.</li> </ol>

SRIZ-S2

Setbacks from boundaries

SRIZ

- 1. All new buildings must be set back 10m from road boundaries.
- 2. All new buildings must be setback 10m from a zone interface.

Matters of discretion are restricted to:

- 1. location of buildings; and
- 2. scale and bulk of buildings; an
- 3. noise, disturbance and loss of privacy effects on neighbours.

Attachment C – new Strategic Rural Industry Zone



Attachment D – New Fonterra Clandeboye Noise Control Boundary Overlay

