

HURUNUI DISTRICT COUNCIL

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Feedback on the draft Canterbury Regional Policy Statement

Sent via email to RPSreview@ecan.govt.nz on 31 July 2024

1. The Hurunui District Council thanks Environment Canterbury for the opportunity to provide comment on the draft Canterbury Regional Policy Statement. The Hurunui District Council considered the draft at a Council meeting on 30 July 2024 and was involved in many of the briefing meetings with Environment Canterbury staff throughout July 2024.
2. The Hurunui district is located in North Canterbury. We have approximately 12,558 residents and cover an area of 8,646 km² spanning from the east coast across to the Main Divide. The Hurunui district is predominantly rural land interspaced with small service towns. Our economy is primarily reliant on primary production and tourism.
3. We are happy to discuss any points in our feedback further if this would be useful to Environment Canterbury staff.

In summary, the detailed matters addressed in our feedback, attached below, include:

- Requesting amendments to relevant RPS provisions to ensure the Council's South Ward Spatial Plan will be recognised as a strategic growth plan by the RPS to provide for future urban, rural lifestyle and rural residential growth
- Requesting amendments to relevant provisions dealing with highly productive land, to provide for the proactive relocation of communities at risk from natural hazards
- Requesting amendments to provisions dealing with the restoration and maintenance of indigenous biodiversity to ensure they properly give effect to the National Policy Statement on Indigenous Biodiversity
- Requesting amendments to provisions dealing with the provision of reticulated wastewater infrastructure to ensure empty sections zoned for urban purpose can still be developed, in communities where the provision of such infrastructure is not practical
- Requesting that policies addressing rural lifestyle development are amended so that such development is not required to be located adjacent to existing or planned urban areas
- Seeking clarification about what effect new assessment criteria for outstanding natural features and landscapes will have on the Hurunui District, which has recently carried out an assessment to identify the district's outstanding natural features and landscapes using best practice criteria
- Requesting that land to the east of Amberley be excluded from mapping of highly productive land in the RPS, due to the recently developed South Ward Spatial Plan having identified the area as a suitable location for Amberley's future urban growth and due to existing reverse sensitivity effects

In addition, we understand that the intention is for the proposed Regional Policy Statement to be publicly notified sometime in December 2024 (prior to 20 December).

Notification periods over the Christmas/new year period is seen by many as being a less-than-optimal time to effectively engage with the community to seek their feedback and submissions, especially on a significant document like the proposed Canterbury Regional Policy Statement. It is also a challenging time for territorial authorities who may not be able to effectively engage with elected members due to this being a period when no Council meetings are typically scheduled and where potential Council submissions can be considered.

The Hurunui District Council requests that Environment Canterbury reconsider when the proposed Regional Policy Statement is publicly notified, and instead publicly notifies it from an early to mid-February 2025 notification timeframe. In the event notification still occurs in December 2024, the Council suggests an extended public notification timeframe of not less than 60 working days from the time the proposed Regional Policy Statement is publicly notified.

Yours faithfully,
Judith Batchelor
Chief Strategy and Community Officer

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Feedback form for the draft Canterbury Regional Policy Statement (CRPS)

Pre-notification consultation under Clause 3, First Schedule of the Resource Management Act 1991

Name of organisation or person providing feedback:	Hurunui District Council
Contact person (if different from the one above):	Judith Batchelor
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Draft RPS Provision	Suggested change(s)	Reason(s) for proposed change(s)
Early and ongoing engagement between Environment Canterbury, Territorial Authorities and other relevant stakeholders with respect to implementation of various policies	Early and ongoing engagement between Environment Canterbury, Territorial Authorities and other relevant stakeholders will be critical to ensure the draft Regional Policy Statement is coherent, fit for purpose, and able to be implemented.	
Definitions	<p>Move Māori words from the glossary section to the definitions section, where they are dealing with a substantive matter and are not merely required to provide clarity of interpretation</p> <ul style="list-style-type: none"> • Hāpua • Mana whenua • Marae • Papakāinga/kāinga nohoanga • Māori land (see UFD-P11) • Others as identified in any review 	<p>It is more logical that Māori words and terms that are defined in higher level planning instruments, such as the Resource Management Act (mana whenua), or that are addressing a substantive policy matter, such as the provision of Papakāinga/kāinga nohoanga are located in the definitions section.</p>

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SRMR-I2 – The built environment and physical resources	Add commentary to recognize that some regionally significant infrastructure may have a functional or operational need to locate in sensitive environments, such as the coastal environment.	It is important that the RPS clarifies that in some cases regionally significant infrastructure may have a functional or operational need to locate in sensitive environments.
IM-O4 Wellbeing, resource use and access	<p>Amend as set out below:</p> <p>...</p> <p>3. Access to the foreshore and seabed <u>coastal marine area</u>, and the beds of rivers and lakes <u>surface water bodies</u> is maintained and enhanced, particularly where enhanced access will either:</p> <p>a. result in greater opportunities for the protection of ecosystem health, or</p> <p>b. provide for the relationship of mana whenua with their culture, traditions, ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Add a definition of surface water body as follows: <i>Fresh water or geothermal water in a river, lake, stream, pond, wetland, or any part thereof, which is not located within the coastal marine area except this excludes artificial watercourses.</i></p>	<p>Provides greater clarity about the area to which relevant provisions apply and avoids the need to develop a separate definition for foreshore and seabed.</p> <p>Alternatively, if amending the Objective is not considered appropriate, add a definition for foreshore and seabed.</p>
IM-05 – Built environments (2)(I)	Amend the Objective so that IM-05(2)(I) recognises Council growth strategies which have included comprehensive community engagement processes are equally relevant strategic planning instruments for consideration of future urban, rural lifestyle, and rural residential growth that is can be integrated, sustainable and strategic.	<p>The Council has completed a spatial planning exercise for the South Ward of the Hurunui District. The South Ward Spatial Plan has gone through two rounds of public engagement, but a decision was made to not go through the special consultative procedure as most of the Spatial Plan actions will require further public engagement, including through 1st Schedule RMA processes.</p> <p>What this means is that the recently developed South Ward Spatial Plan would not meet the definition of strategic growth plan or future development strategy.</p>

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		The Council would prefer that the Objective and any associated policies are amended so that any Council strategic growth strategies which have not been developed in accordance with the strict definition of strategic growth plans or future development strategies, as defined in the draft RPS, but which have included comprehensive public engagement can still be deemed to comply with this Objective and any associated policies.
AIR-P4(1)(e)	Amend policy to ensure correct numbering is used e. avoiding, remedying or mitigating the adverse effects, not specified in AIR-P4.2 and AIR-P4.3. above from air discharges.	Numbering issue, as there is no P4.2 and P4.3
CE-P7 – Walking and vehicle access	<ol style="list-style-type: none"> 1. Manage walking and vehicle access in the coastal environment as follows: <ol style="list-style-type: none"> a. maintaining and enhancing public walking access to, along and adjacent to the coastal marine area, and only impose a restriction on such access where it is necessary: <ol style="list-style-type: none"> i. to protect threatened indigenous species; or ii. to protect dunes, estuaries and other sensitive natural areas or habitats; or iii. to protect sites and activities of cultural value to Māori; or iv. to protect historic heritage; or v. to protect public health or safety; or vi. to avoid or reduce conflict between public uses of the coastal marine area and its margins; or vii. for temporary activities or special events; or viii. for defence purposes in accordance with the Defence Act 1990; or ix. to ensure a level of security consistent with the purpose of a resource consent; or 	<p>Amend to ensure references to the foreshore and seabed are deleted and replaced with either the coastal marine area or the coastal environment, whichever term is appropriate to manage the issue.</p> <p>Consider additional wording to sub-clause (c)(i)-(iii), to recognize that some damage, harm or disturbance to the various matters identified is inevitable where vehicle access is provided, but to ensure such damage, harm or disturbance is managed.</p> <p>Methods: Amend the Methods table to recognize that other methods to implement this policy may be more efficient and effective than through provision of rules in a district plan, such as through a Council by-law.</p>

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	<ul style="list-style-type: none"> x. in other exceptional circumstances sufficient to justify the restriction; and b. before imposing a restriction, consider, and where practicable provide for alternate routes that are available to the public, free of charge, at all times. c. controlling the use of vehicles, except for emergency vehicles, on beaches, foreshore, seabed and adjacent public land <u>in the coastal environment</u> where it might result in: <ul style="list-style-type: none"> i. damage to geological systems and processes, historic heritage, sites of significance to mana whenua or habitats of fisheries resources of significance to customary, commercial or recreational users; or ii. harm to ecological systems or to indigenous biodiversity; or iii. disturbance to the peaceful enjoyment of or danger to other beach users; and d. identifying areas and times when recreational vehicle use on beaches, foreshore and the seabed <u>in the coastal marine area</u> may be appropriate; and e. identifying and making appropriate provision for vehicle access where it is required for boat launching, or as the only means to access private property or public facilities, or to continue the operation of existing commercial activities; and f. recognising that the operators of regionally significant infrastructure may need to have 	

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	<p>their own controls over access to operational areas, and that public access to such areas is not always appropriate.</p>	
<p>LF-FW-P4 – Water quantity</p>	<p>Provide clarification.</p>	<p>There is no mention of recreational values/ requirements. Is this covered by social requirements?</p>
<p>LF-RL-P4 Highly productive land</p>	<p>Provide clarification.</p>	<p>The provisions from the NPS-HPL have been transferred directly from clauses 3.7, 3.8, 3.9 and 3.10. however the provisions from clause 3.6 have not been included. Was it a conscious decision to not include these provisions?</p> <p>If it was a conscious decision Council is interested to understand why, as the effect of not including these provisions means there are no criteria for considering urban expansion onto HPL in the RPS.</p> <p>Furthermore, consideration needs to be given to providing a pathway for the proactive relocation of communities at risk from natural hazards (such as in the case of the potential proactive relocation of the Amberely Beach community for example).</p>
<p>ECO-P1 – Approach to managing indigenous biodiversity</p>	<p>Amend as set out below:</p> <ol style="list-style-type: none"> 1. Adopt an integrated and co-ordinated approach to managing Canterbury’s indigenous biodiversity by: <ol style="list-style-type: none"> a. recognising that many indigenous species live in different environments and habitats and often move through them during their life cycle; and b. recognising the risks climate change poses to indigenous biodiversity and requiring that those risks are actively managed; and c. maintaining, restoring and enhancing the connectivity of biodiversity networks; and 	<p>It is not clear why there is a need to focus actions to only reduce the risk of new invasive species infestations and not existing infestations as well.</p>

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	<ul style="list-style-type: none"> d. promoting collaboration between individuals and agencies with biodiversity responsibilities; and e. encouraging and facilitating actions adopted by local authorities, mana whenua, community groups and landowners to improve biodiversity protection; and f. taking actions to reduce the risk of new invasive species infestations 	
ECO-P1 – Approach to managing indigenous biodiversity	<p>Provide clarification</p> <p>1. Adopt an integrated and co-ordinated approach to managing Canterbury’s indigenous biodiversity by:</p> <ul style="list-style-type: none"> a. ...; and b. recognising the risks climate change poses to indigenous biodiversity <u>and requiring that those risks are actively managed</u>; and c. ... 	<p>Council appreciates that it is important to take an integrated and coordinated approach to managing indigenous biodiversity, including by recognizing that climate change poses a significant risk to indigenous biodiversity.</p> <p>Council is interested to understand how Environment Canterbury anticipates this particular policy (ECO-P1(1)(b) will be implemented, who the lead agency is, and how it will be funded, given it would appear to be a significant program of work, not only in identifying indigenous biodiversity that is at risk from climate change, but also in actively managing those risks.</p>
ECO-P3 – Maintain indigenous biodiversity	<p>Provide clarification on Sub-clause (b) –</p>	<p>Clarity about who is leading implementation of sub-clause (b) would be useful to understand. Identifying the matters set out in sub-clause (b) is likely to be extremely onerous and costly for communities with limited resources to implement.</p> <p>While sub-clause (b) is not confined to highly mobile fauna, Clause 3.20 of the NPS-Indigenous Biodiversity (NPS-IB) sets out that Regional Councils will record areas outside of SNAs that are highly mobile fauna areas. If it is anticipated that TAs will be required to identify these areas then we will require significant assistance to carry this work out. Furthermore, clarification about whether it is intended that such routes be mapped in District Plans would be appreciated.</p>

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	<p>Amend sub-clause (c) as set out below:</p> <ol style="list-style-type: none"> 1. Maintain indigenous biodiversity by: <ol style="list-style-type: none"> a. ... b. ... c. Restoring and enhancing <u>Promoting the restoration and enhancement of habitats</u> of indigenous biodiversity where appropriate; and d. ... 	<p>Sub-clause (c) – While we support the restoration of indigenous biodiversity, restoration and maintenance activities are beyond what is anticipated a district plan can achieve as these activities are typically subject to funding decisions under the Long Term Plan process.</p> <p>Furthermore, the proposed amendment better gives effect to Clause 3.21(1) of the NPS-IB (<i>Local authorities must include objectives, policies, and methods in their policy statements and plans to <u>promote</u> the restoration of indigenous biodiversity, including through reconstruction of areas.</i></p>
<p>ECO-P5 – Protect areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna that are most at risk of irreversible loss</p> <p>ECO-P6 – Protect areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna</p>	<p>Amend ECO-P5 and ECO-P6 , to create a new ECO-P5 and ECO-P6, as set out below:</p> <p><u>ECO-P5 - Significant indigenous vegetation and significant habitats of indigenous flora and fauna that are most at risk of irreversible loss</u></p> <ol style="list-style-type: none"> 1. <u>Prioritise the protection of areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna that are most at risk of irreversible loss as identified in Part 2 of Appendix 1</u> <p><u>ECO-P6 – Protection of significant indigenous vegetation and significant habitats of indigenous flora and fauna</u></p> <ol style="list-style-type: none"> 1. <u>Protect areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna by:</u> <ol style="list-style-type: none"> a. <u>avoiding new subdivision, use and development of those areas that would actually or potentially result in:</u> <ol style="list-style-type: none"> i. <u>loss of ecosystem representation and extent; or</u> ii. <u>disruption to sequences, mosaics or ecosystem function; or</u> 	<p>Not clear why the proposed policy framework to protect areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna (SNAs) as set out in ECO-P5 and ECO-P6 is considered the most appropriate.</p> <p>There is nothing in the NPS-IB which elevates the protection of SNAs that are most at risk of irreversible loss over other SNAs.</p> <p>Furthermore, it is not clear why the adverse effects of new subdivision, use and development identified in Clause 3.10(2) of the NPS-IB are not also relevant to SNAs that are most at risk of irreversible loss, as set out in ECO-P5.</p> <p>The framework could be amended to include a Policy which sets out to prioritise the protection of SNAs that are most at risk of irreversible loss, with an amended Policy which more clearly gives effect to the NPS-IB.</p>

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	<ul style="list-style-type: none"> iii. <u>fragmentation of areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</u> iv. <u>a reduction in the function of areas of significant indigenous vegetation and significant habitats of indigenous fauna as a buffer or connection to other habitats or ecosystems; or</u> v. <u>a reduction in the population size or occupancy of Threatened or At Risk (declining) species; and</u> b. <u>avoiding, remedying, or mitigating other adverse effects of new subdivision, use and development of those areas; and</u> c. <u>avoiding, remedying or mitigating adverse effects of adjacent subdivision, use and development on the significant vegetation and significant habitats of indigenous flora and fauna; and</u> d. <u>taking action to prevent incursions of invasive species within areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna</u> 	
<p>ECO-P7 – Restore and enhance indigenous biodiversity</p>	<p>Amend clause 1 of WECO-P7 as follows: ECO-P7 – Restore and enhance indigenous biodiversity 1. <u>Restore and enhance</u> <u>Promote the restoration and enhancement of ecosystems, habitats and indigenous biodiversity, including by:</u></p>	<p>The proposed amendments better give effect to Clause 3.21(1) of the NPS-IB (Local authorities must include objectives, policies, and methods in their policy statements and plans to <u>promote</u> the restoration of indigenous biodiversity, including through reconstruction of areas).</p> <p>In many cases, the restoration and enhancement of indigenous biodiversity are beyond what is anticipated a district plan can achieve as these activities are typically subject to funding decisions under the Long Term Plan process.</p>

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<p>ECO-P8 – Targets for increasing indigenous vegetation cover</p>	<p>No amendments recommended</p>	<p>Council understands this policy gives effect to Clause 3.22(4) of the NPS-IB, which sets out that Local Authorities must promote the increase in cover with Objectives, Policies and Methods in Plans etc.</p> <p>Council is interested to understand how is it anticipated this policy will be implemented.</p> <p>One query is whether this an appropriate policy to include/implement as a regulatory tool and whether resolution of the issues the policy is seeking to address is not better dealt with in a regional biodiversity strategy and by way of non-regulatory methods and support.</p> <p>In addition, we are interested to better understand:</p> <ul style="list-style-type: none"> • how will the % of cover be calculated, and what methods will be implemented to assess whether compliance has been achieved? • what sort of district plan implementation method(s) is anticipated for this Policy, especially when there may be limited opportunities for increasing vegetation cover?
<p>ECO-M5</p>	<p>Amend as follows: Local authorities <u>should</u> consider any projects or funding that may be necessary to give effect to the relevant policies and provide for necessary projects or funding in their annual plans or long-term plans.</p>	<p>To make more legible</p>
<p>PRINCIPAL REASONS</p>	<p>Amend as follows</p> <p>PRINCIPAL REASONS Like the rest of New Zealand/Aotearoa, there has been a significant loss in <u>of</u> indigenous biodiversity in Canterbury / Waitaha. This has primarily occurred through the loss and modification of habitat because of extensive deforestation,</p>	<p>To fix minor grammar mistakes and to ensure legibility</p>

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	<p>burning, drainage, settlement and development, and the introduction of invasive pests. As well as the overall decline in our indigenous biodiversity, many remaining areas of significant indigenous vegetation and significant habitats of indigenous fauna are potentially threatened and are likely to be not <u>lost</u> without ongoing maintenance and protection. Protection of such areas are a matter of national importance under Section 6(c). Some of these areas may also have significant cultural value for tangata whenua and warrant protection under Section 6(e) of the RMA.</p> <p>The NPS-IB requires the maintenance of indigenous biodiversity across New Zealand/Aotearoa so there is at least no overall loss in indigenous biodiversity after its commencement date. The NZCPS <u>also</u> seeks the protection of indigenous biodiversity within the coastal environment, <u>while the</u> NPSFM requires habitats of indigenous freshwater species to be protected.</p>	
<p>EIT-INF-P1 – Managing the Effects of Regionally Significant Infrastructure</p>	<p>Amend as set out below:</p> <ol style="list-style-type: none"> 1. Enable the operation, maintenance, and development of regionally significant infrastructure, while <ol style="list-style-type: none"> a. Avoiding adverse effects within the coastal environment in accordance with ECO-P3; NFL-P2, NATC-P3 and HCV-P3; and b. avoiding the identified adverse effects in ECO-P5 —Protect areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna that are most at risk of irreversible loss, NFL-P3 —Managing significant or otherwise valued natural features and 	<p>To make more legible</p> <p>Council is also interested to understand whether EIT-INF-P1(a) creates an issue in interpretation/implementation and should be reworded as Avoid <u>Manage</u> adverse effects within the coastal environment ...</p> <p>Clause 1 enables infrastructure, but sub-clause (a) seeks to avoid it, even though on the face of it the policy then defers to the other Chapters. Amending the policy to Manage ..., subject to policies in the other Chapters makes it clearer and avoids any chance of misunderstanding</p> <p>Ensure the policy framework provides sufficiently for the operation, maintenance, and development of regionally significant infrastructure within the coastal environment, and to also recognise that in some cases, there are no alternative to</p>

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	landscapes and NATC-P3 – Preserving natural character within the coastal environment; and	locating regionally significant infrastructure in the Coastal Environment – due to functional or operational needs.
EIT-INF-P3 – Protecting regionally significant infrastructure	Amend as set out below: 1. Protect existing or lawfully established regionally significant infrastructure, or regionally significant infrastructure identified in a strategic growth plan, by:	There appears to be an error in seeking to protect all existing regionally significant infrastructure, rather than that which has been lawfully established.
EIT-INF-P6 – On-site wastewater systems	Amend so that existing allotments within urban areas have a grandfathering clause to allow for their future development for the underlying zone’s purpose. <u>INF-P6</u> <u>Avoid the use of on-site wastewater systems on lots less than 4ha, unless</u> a. <u>The site is already zoned RLZ or LLRZ or other urban zone as at [insert date]; or</u> b. <u>It is demonstrably impracticable to connect to a reticulated network and any adverse effects can be managed in accordance with LF-FW-P3 – Water quality and LF-FW-P6 – Freshwater habitat.</u>	A more balanced approach to address the issues this policy is seeking to resolve is required. As currently drafted, the Policy is overly blunt in seeking to avoid development in urban areas which are not serviced by reticulated wastewater systems. This and other similarly worded policies will prevent development of empty sections which are currently zoned for urban purposes within existing urban areas, but which are not currently serviced by reticulated wastewater, and where it is not practical or possible to provide such infrastructure in the future. Small rural townships serve an important social, cultural and economic role within rural New Zealand. The effect of this and similar policies is likely to have a chilling effect on their continued long-term viability. This policy, and similarly worded policies fail to provide for technological advancements in on-site treatment of wastewater and do not provide for the consideration of alternative methods, sites and routes for undertaking discharges, does not provide for the consideration of whether on-site treatment is appropriate to the receiving environment, and does not appear to take account of other activities within a catchment which may be contributing to reduced water quality outcomes.

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EIT-TRA-P1 – Integrating transport infrastructure and land use	<p>Amend as set out below:</p> <ol style="list-style-type: none"> 1. Integrate land use and transport planning by: <ol style="list-style-type: none"> a. Promoting <u>Prioritising</u> the safe, efficient and effective use of transport infrastructure; and b. Requiring that transport infrastructure is planned, funded and staged to integrate with urban growth; and c. Preferring land use patterns that reduce, where practicable, the demand for private motor vehicles. 	<p>It is not clear why '<i>Promoting the safe, efficient and effective use of transport infrastructure</i>' is considered appropriate.</p>
EIT-TRA-P6 – Transport Connections	<p>Clarification sought.</p>	<p>The Council is interested to understand why this is the most critical issue facing the region in relation to both energy and transport, and what the intention of the policy is. Furthermore, the policy does not appear to have a corresponding Method to implement it in any of EIT-M1 – EIT-M8 (inclusive).</p> <p>The RPS can only influence the contents of District Plans and cannot compel TAs to provide funding for projects to put in links and roads, this is the function of the LGA and LTP process. District plans specify the roading hierarchy, layouts that support public transport and active transport connections, density, etc.</p> <p>It is unclear how a district plan would give effect to this policy, or if this is the preferred implementation method.</p>

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<p>HAZ-NH-P2 – Flooding Risk</p>	<p>Provide clarification.</p>	<ul style="list-style-type: none"> • Moderate importance buildings includes enclosed concrete floor sheds over 40m² – based on definitions, which would require their floor levels to be at least 300mm above a 200 year ARI. Is this intentional? Consideration to be given to amending definition to exclude and non-habitable, structures/buildings, such as garden sheds, implementation sheds which may have a concrete or similar ‘permanent’ floor and which are currently captured by the definition of moderate importance building. • The reduced 300mm floor levels above a 500 year ARI flood scenario level differs from the 400mm currently imposed – is this intentional? • High importance buildings includes dwellings – now a 1 in 500 ARI – higher event. Will ‘structural impact’ influence foundation types in these areas? • The operative RPS states “Most territorial authorities in Canterbury have adopted higher than Building Act minimum floor level controls in their district plans, based on 0.5% or 0.2% AEP flood events. Standards higher than that specified in this policy shall continue to apply, at the discretion of territorial authorities’ – Will the discretion to adopt higher thresholds no longer be at our discretion? If so, consider rewording to include ‘at least’ into the policies. • Sub-clause c. is very vague – how does one demonstrate risk ‘is reduced to provide an equivalent standard of protection by appropriate alternative means.’

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HAZ-NH-P6 – Wildfire risk	<p>Clarification, and;</p> <p>Amend the definition of Significant wildfire fuel sources as follows:</p> <ul style="list-style-type: none"> a. a forest that is deliberately established for commercial purposes, being at least 1 ha of continuous forest cover of exotic forest species that has been planted; or b. a stand of more than one row of trees for the purposes of, firewood, the creation of other wood products, Christmas celebration <u>celebration</u> trees, a carbon sink, <u>shelterbelts, the creation of areas of ecological restoration or enhancement,</u> erosion control, pest, or wilding tree management purposes.' 	<p>Additional significant wildfire fuel sources need to be identified. It is not clear why areas created for ecological restoration or enhancements, or shelterbelts are not included.</p> <p>Council is also interested to understand why only forestry that is deliberately established for commercial purposes has been considered as a significant wildfire fuel source and why indigenous vegetation/forest has been excluded, given that it can also be a significant wildfire fuel source.</p>

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HAZ-NH-P9 – Climate change and natural hazards	Provide clarification.	<p>Without having access to s32 reports its difficult to make an informed call on whether the proposed policy is appropriate.</p> <p>If we're accounting for climate change effects to 2130 and SSP3-7.0 'Shared Socio-economic Pathways (SSPs). These comprise different socio-economic assumptions that drive future greenhouse gas emissions.' - which means high emission, 3° warmer - and recommending finished floor levels under HAZ-NH-P2 to 200 & 500 year terms; What are the implications of this? Needs to be quantified - seems like there could be some very high floor levels and then there's egress?</p>
HCV -P1 Approach to historic heritage.	<p>Reword HVC – P1.1.b.</p> <p>b. Recognising that historic heritage, cultural and mana whenua values within landscapes are <u>can be</u> distinct from natural values and landscapes.</p>	Natural and physical resources such as natural values within landscapes can have heritage values.
HCV – P2 Identify places and areas of historic heritage value.	<p>Reword HVC – P2.1.a.</p> <p>a. recognising <u>having regard to</u> any relevant entry in the Historic Places Trust Register.</p>	<p>Section 74(2)(b)(iia) of the Resource Management Act 1991 requires territorial authorities to <u>have regard to</u> any relevant entry on the New Zealand Heritage List/Rārangī Kōrero when preparing or changing a district plan.</p> <p>The proposed wording to <u>recognise</u> any relevant entry in the New Zealand Heritage List/Rārangī Kōrero is unwarranted.</p>
HCV - P4 Rangitiratanga, kaitiakitanga and tikanaga.	<p>Amend as set out below:</p> <p>c. providing for mana whenua to exercise their role as kaitiaki within sites and areas of significance <u>to mana whenua</u>; and</p>	Clarifies which sites and areas this sub-clause applies to.

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<p>HCV - P5 Protect the relationship of mana whenua with sites and areas of significance to Ngai Tahu.</p>	<p>Amend HCV-P5(1)(c) as set out below:</p> <ul style="list-style-type: none"> c. promoting subdivision, use and development that provides for mana whenua to practice their culture and traditions including the provision of safe <u>appropriate</u> access, by mana whenua, to significant sites and areas. 	<p>The proposed amendment would capture managing access including restricting access to significant sites and areas in accordance with tikanga Māori.</p>

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<p>NFL-P1 – Identifying outstanding, significant, or otherwise valued natural features and landscapes</p>	<p>Provide clarification.</p>	<p>Council has in the relatively recent past reviewed its District Plan and included outstanding natural features and landscapes using best practice assessment criteria. The assessment criteria used to identify ONFL in our operative District Plan generally align with the assessment criteria set out in Appendix 7 of the draft RPS, however there may be some nuanced differences.</p> <p>Some clarity on the extent to which we, and other TAs who have also recently carried out detailed and rigorous landscape assessments to identify ONFL across their districts, will be required to revisit the identification of ONFL in the near future to give effect to the new assessment criteria in Appendix 7 would be helpful.</p> <p>It would also be helpful if feedback can be provided as to the extent the proposed assessment criteria in Appendix 7 have had regard to the assessment criteria TAs have used in the recent past to assess ONFL – i.e. who developed the assessment criteria and what are they based on?</p>
<p>NFL-P2 – Protecting outstanding natural features and landscapes</p>	<p>Amend NFL-P2 as follows:</p> <p>NFL-P2 – Protecting outstanding natural features and landscapes</p> <ol style="list-style-type: none"> 1. Protect outstanding natural features and landscapes (including seascapes) by <u>managing the use and development, and its potential effects on the values of outstanding natural features and landscapes (including seascapes) from inappropriate subdivision, use and development.</u> 	<p>It is not clear from the information provided what the reasons are for the change in management approach for ONFL from the operative RPS.</p> <p>Policy 12.3.2 of the operative RPS seeks to ensure management methods achieve the protection of the recognised values of ONFL from inappropriate subdivision, use and development, which will be achieved in District Plans through objectives, policies or methods that avoid, remedy or mitigate adverse effects of subdivision, use and development of land on the values of outstanding natural features and landscapes.</p> <p>The proposed NFL-P2 limits the extent to which Territorial Authorities can take a more considered evaluative approach to management of ONFL by imposing a blunt avoid policy to the management of ONFL. Such an approach does not provide the opportunity for Territorial Authorities to provide clear direction</p>

Draft RPS Provision	Suggested change(s)	Reason(s) for proposed change(s)
		on when and where activities and/or effects should be avoided or managed.
NATC-P2 – Identifying natural character in the coastal environment	<p>Make amendments as shown below:</p> <p>NATC-P2 – Identifying natural character in the coastal environment</p> <p>1. Identify natural character of the coastal environment (including the Coastal Marine Area), including by recognising the areas and values of high, very high and outstanding natural character in the Coastal Environment, set out in Appendix 4 Part 2 – Natural character in the coastal environment</p>	To make the Policy more legible
NATC-P4 – Restoring natural character	<p>Make amendments as shown below:</p> <p>NATC-P4 – Restoring natural character</p> <p>1. Prioritise restoration of natural character in the coastal environment (including the Coastal Marine Area), and in and near wetlands, and lakes and rivers and their margins, where:</p> <ul style="list-style-type: none"> a. restoration of natural character will assist in enhancing priority ecosystems and indigenous biodiversity as identified in Policy ECO-P7 – Restore and enhance indigenous biodiversity or achieving biodiversity targets identified in ECO-P8 – Targets for increasing indigenous vegetation cover; or b. restoration of natural character will enhance defences against natural hazards; or c. restoration of natural character will enhance outstanding natural features and landscapes, or other landscapes identified in in accordance with NFL-P1 Identifying outstanding, significant, or otherwise valued natural features and landscapes; or 	To make the Policy more legible

Draft RPS Provision	Suggested change(s)	Reason(s) for proposed change(s)
	<ul style="list-style-type: none"> d. restoration of natural character will enhance outstanding waterbodies identified in accordance with LF-FW-P7 - Outstanding water bodies; or e. restoration of natural character will restore the relationship between mana whenua and the natural environment, including through enhancement of mahinga kai values; or f. natural character is modified, and restoration will move an area from modified to wild or pristine. 	
UFD – P1 Approach to managing urban development.	Add the following to UFD-P1. <u>f. Managing any potential reverse sensitivity effects with other land uses including infrastructure.</u>	Management of any potential reverse sensitivity effects with other land uses is particularly relevant in a rural district.
	Add the following to UFD-P1. <u>g. Recognising and managing the effects of growth and development on settlements with unique character and environmental qualities.</u>	The need to protect and enhance the special character and environmental qualities of special character areas, including tourism focused settlements such as Hanmer Springs, through managed urban development needs to be recognised.
UFD – P2 Rangatiratanga, kaitiakitanga and tikanaga.	Amend as set out below: <ul style="list-style-type: none"> 1. Recognise and give effect to Ngāi Tahu rangatiratanga in respect of the use and development of Māori Reserves and Māori land for mana whenua aspirations to develop their land by: <ul style="list-style-type: none"> c. enabling the development and use of land and resources within Māori Reserves and on Māori land throughout urban environments as determined by mana whenua, 	Council is interested to understand what this policy, and its associated definition of Māori Land as defined by UFD-P11, is seeking to achieve, and why enabling the development and use of land and resources beyond Māori Reserve land is required for resource management purposes. If the intent of this and other similar proposed objectives and/or policies is to provide for the development of Māori Reserve land when such land may be subject to coastal erosion, inundation, flooding and other climate change induced risks, then a more considered targeted framework may be required.
UFD – P3	Amend as set out below: UFD – P3.2(f)	A more balanced approach to address the issues this policy is seeking to resolve is required.

Draft RPS Provision	Suggested change(s)	Reason(s) for proposed change(s)
<p>Urban growth and development requirements – wider region.</p>	<p>f. is serviced by reticulated wastewater infrastructure, <u>unless the site is already zoned RLZ or LLRZ or other urban zone as at [insert date]</u>, a safe and sustainable reticulated drinking water supply, and stormwater treatment and disposal which manages adverse effects on water quality ...</p>	<p>As currently drafted, the Policy is overly blunt in seeking to avoid development in urban areas which are not serviced by reticulated wastewater systems. This and other similarly worded policies will prevent development of empty sections which are currently zoned for urban purposes within existing urban areas, but which are not currently serviced by reticulated wastewater, and where it is not practical or possible to provide such infrastructure in the future.</p> <p>Small rural townships serve an important social, cultural and economic role within rural New Zealand. The effect of this and similar policies is likely to have a chilling effect on their continued long-term viability.</p> <p>This policy, and similarly worded policies fail to provide for technological advancements in on-site treatment of wastewater and do not provide for the consideration of alternative methods, sites and routes for undertaking discharges, does not provide for the consideration of whether on-site treatment is appropriate to the receiving environment, and does not appear to take account of other activities within a catchment which may be contributing to reduced water quality outcomes.</p>
<p>UFD – P7 Climate resilient urban areas.</p>	<p>Reword UFD – P7.1.e</p> <p>e. requiring the efficient use of water and energy in buildings and infrastructure, including, for example capturing storing and recycling rain <u>and grey water</u>; and</p>	<p>In addition to rainwater harvesting grey water recycling should also be addressed. Grey water recycling would be beneficial in regard to settlements in the district that are not served by a reticulated wastewater infrastructure. It would reduce the pressure on the on-site storage/treatment system.</p>
<p>UFD – P8 Rural lifestyle and rural residential development requirements.</p>	<p>Amend the policy so that rural lifestyle development does not need to be adjacent to existing or planned urban areas.</p>	<p>There is too much emphasis on ensuring rural lifestyle development contributes to establishing or maintaining the qualities of a well-functioning urban environment. Council questions whether this is appropriate, and whether a more</p>

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		<p>nanced approach is more appropriate, particularly for areas outside of Greater Christchurch.</p> <p>The NZ Planning Standards definition for Rural Lifestyle is: <i>areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.</i></p> <p>Council’s view is that based on the definition of Rural Lifestyle, there should be no requirement for such development to occur adjacent to existing or proposed urban areas, nor a specific need for them to contribute to establishing or maintaining the qualities of a well functioning urban environment given the definition sets out they are smaller lots within a rural environment. Individual TAs should have the scope to consider the most appropriate location for such developments, provided any adverse effects can be avoided remedied or mitigated, and provided such development only occurs where it has been identified in a strategic growth plan, future development strategy, or rural residential strategy.</p>
<p>UFD – P11 Approach to Māori land.</p>	<p>Further clarification sought</p>	<p>Council is interested to understand what this policy is seeking to achieve, and why enabling the development and use of land and resources beyond Māori Reserve land is required for resource management purposes.</p> <p>If the intent of this and other similar proposed objectives and/or policies is to provide for the development of Māori Reserve land when such land may be subject to coastal erosion, inundation, flooding and other climate change induced risks, or other natural hazards, then a more considered targeted framework may be required.</p>
<p>MAPS – Highly Productive Land</p>	<p>Remove the areas shown in the image below. The recently developed South Ward Spatial Plan identifies the areas outlined in green and yellow as preferred urban growth directions for Amberley.</p>	

Draft RPS Provision	Suggested change(s)	Reason(s) for proposed change(s)
	<p>The triangle of land outlined in yellow in the image below has residential development on two of its boundaries and there are reverse sensitivity effects on the productive use of this land.</p> <p>The areas outlined in green is also a preferred growth direction identified in the recently developed South Ward Spatial Plan for Amberley and is over an area of less productive land.</p> <p>Removing these areas from the highly productive land mapping, along with recommended amendments to IM-05(2)(l) provides for Amberley's future growth, when required, in a sustainable manner.</p>	