

**Plan Change 65: Summary of Submissions by Submitter**

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S1/1	Lynette M Worsfold	Rules – general comment	Oppose	Oppose until issues have been altered to reflect the current landscape features which is not currently correct. The current process is fragmented as it does not involve the Rangitikei District Council and the Horizons Regional Council.	Review proposed changes and clarity by landscaper.
S2/1	Barbara Thomassen	Rules – general comment	Unstated	That Council undertake full consultation with Runanga, Hapu and Iwi of Ngāti Hauiti, and the records of consultation documented. That consultation be undertaken with the Council's representatives and the Maori Liaison Officer. Positive to maintaining the mana of the awa landscape.	That submission is accepted and completed by Council.
S3/1	Karen Fallauer	Planning Maps	Unstated	The details on boundary of allocated areas needs to be challenged. What is the actual land mass involved. What farming activities or future activities are allowed for. John Hudson needs to revisit interested parties with criteria. Regional Council needs to be involved as currently this process is fragmented by three authorities not working together.	Council needs to amend the proposed plan change to reflect the true landscape features.
S4/1	Jack Baker	Planning Maps	Unstated	Council criteria needs to be challenged. 6km or more is delineated and not defined correctly. What is the land mass involved. What activities will change in the future. Currently only Manawatu Council is involved resulting in a fragmented process.	Changes to the current proposal to have a realistic land use and identification.
S5/1	Pedersen and Wilson Families	Appendix 1 ONFL 15	Oppose	Archive material at HRC and MDC about Lake Kaikokopu is incorrect. The lake is not a natural feature; not covered by QE2 covenant; not an ONL; does not exist; and the wetland around has died out and disappeared as it never gets wet. The lake was created by Major Bob Wilson for duck shooting by building a weir across Drain No. 27. The lake was drained on 21st June 2015 when heavy rain washed away the weir. Open water has gone and regenerated pasture has replaced birdlife. The drain is labelled No. 8 and is maintained by Oroua Downs Drainage District Committee under the control of the Manawatu District Council.	Lake Kaikokopu was created by man and removed by nature. The wetland around it is now dryland, drained naturally and assisted by the system mandated and overseen by MDC, specifically Drains 22, 27 and 28; all regularly cleaned by MDC. Submitter asked for reference to Lake Kaikokopu to be removed from PPC65 and not included as ONL. Clearly the lake is gone and was never natural.
S6/1	Sharn Hainsworth	Appendix 1 – general comments	Oppose	Oppose ONFLs and SAFs because zones are static and cliffs erode. Oppose regulates meaning no pipes or cables down cliff for microhydro. Submitter owns cliff and want to make money from gravitational potential energy. Riverside retired.	Do not use zoning, use a non-regulatory method that fits the dynamic nature of the landscape and difficulty of managing it. Permit discrete cables, powerlines, pipes for water takes and microhydro.

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S6/2	Sharn Hainsworth	Appendix 1 – general comments	Oppose	Oppose NFLs and SAFs based on lack of adequate hard copies sent out to affected owners early in formal consultation period. Haven't seen evidence of robust section 32 evaluation of cost benefit analysis and next best alternatives that takes landowners into account.	Proposed Plan Change should not proceed without the issues rectified.
S7/1	Byfords Construction 2014 Ltd.	NFL-O1	Neutral	Not opposed to Rangitikei River being offered a level of protection, but concerned that s32 report does not make any provision for gravel extraction. Plan change impacts operation at Otaru Road, Ohingaiti. Plan change should allow for gravel extraction and processing operations because of social and economic need for aggregate. Restrictions on gravel resources causes the cost of aggregate to increase, particularly in relation to transportation cost. Regional rules ensure there is minimal impact on the environment, so the District council only needs to give guidance around scale and noise pollution to protect amenity values. The cliffs are already managed by the regional council extraction rules (Rule 17-17).	Provision be made for gravel extraction and portable processing operations.
S7/2	Byfords Construction 2014 Ltd.	NFL-R18	Neutral	Current regulations imposed by the Horizons Regional Council is adequate. Excess material in the bed of the river could impact the stability of the river and potentially put roading networks and bridges under pressure. Thus, leading to the loss of the integrity to the papa cliffs that this plan change seeks to protect.	Gravel extraction and portable processing be classified as a Permitted Activity as long as basic operational guides are met (controlling noise and scale) and consent from the Horizons Regional Council has been gained.
S8/1	Department of Conservation	NFL-O1	Support	The Director-General supports council initiatives to identify, map and protect outstanding natural features and landscapes and significant amenity features.	Retain objective.
S8/2	Department of Conservation	NFL-O2	Support	The Director-General supports council initiatives to identify, map and protect outstanding natural features and landscapes and significant amenity features.	Retain objective.
S8/3	Department of Conservation	NFL-O4	Support	The Director-General supports council initiatives to identify, map and protect outstanding natural features and landscapes and significant amenity features.	Retain objective.
S8/4	Department of Conservation	NFL-O4	Support	The Director-General supports council initiatives to identify, map and protect outstanding natural features and landscapes and significant amenity features.	Retain objective.
S8/5	Department of Conservation	NFL-P1	Support	Use of accepted criteria for assessing 'Outstanding' features/ landscapes.	Retain this objective.

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S8/6	Department of Conservation	NFL-P2	Support	Recognised importance of spatially defining areas of protection.	Retain this objective.
S8/7	Department of Conservation	NFL-P3	Support	(Support in part) Wording should be changed to include landscapes as well as features within NFL-APP1 to reflect section 6(b) of the Act. The two identified landscape are listed below as points a) & b).	Amend the policy to read: "To avoided inappropriate use and development within Outstanding Natural Features <u>and landscapes</u> identified in NFL-APP1..."
S8/8	Department of Conservation	NFL-P4	Oppose	Use of 'restrict' considered to be weak and seen as providing opportunity for negotiation for structures to be constructed against intent of policy when read alongside s32. Recommend replacing restrict with avoid.	Policy should be removed and ONF's should be added into NFL-P9 for consistency.
S8/9	Department of Conservation	NFL-P5	Support	This is considered appropriate.	Retain this policy. Prefer to see measurable outcomes to define 'where they do not adversely affect the characteristics and values.'
S8/10	Department of Conservation	NFL-P6	Support	This is considered appropriate.	Retain this policy.
S8/11	Department of Conservation	NFL-P7	Oppose	(Oppose in part) Concerns around the use of reasonably practical. Seen as opportunity for ONFL's to be degraded when alternative is not considered cost effective.	Measures should be in place to determine whether adequate steps have been taken to ensure alternatives have been explored. Recommend inclusion of alternative option analysis to be provided to council.
S8/12	Department of Conservation	NFL-P8	Support	This is considered appropriate.	Retain this policy.
S8/13	Department of Conservation	NFL-P9	Support	This is considered appropriate.	Retain this policy.
S8/14	Department of Conservation	NFL-P9	Support	(Support in part) Policy should include ONF's to be consistent with the level of protection provided for under s6(b).	Amend policy to read: "To avoid the development of new buildings or structures within Outstanding Natural <u>Features and Landscapes</u> identified in NFL-APP1."
S8/15	Department of Conservation	NFL-P10	Oppose	Use of 'restrict' considered to be weak and seen as providing opportunity for negotiation for structures to be constructed against intent of policy when read alongside s32. Recommend replacing restrict with avoid.	Amend policy to read: "To <u>avoid</u> <del>restrict</del> the development of new buildings or structures within an Outstanding Natural Features..."

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S8/16	Department of Conservation	NFL-P11	Oppose	Use of 'restrict' considered to be weak and seen as providing opportunity for negotiation indigenous vegetation to be removed and exotic species to be introduced against intent of policy when read alongside s32. Recommend placing restrict with avoid.	Amend policy NFL-P11 to read: "To <u>avoid</u> <del>restrict</del> the removal of indigenous vegetation from Outstanding Natural Features and Landscapes..."
S8/17	Department of Conservation	NFL-P12	Oppose	Use of 'restrict' considered to be weak and seen as providing opportunity for negotiation indigenous vegetation to be removed and exotic species to be introduced against intent of policy when read alongside s32. Recommend placing restrict with avoid.	Amend policy NFL-P12 to read: "To <u>avoid</u> <del>restrict</del> the introduction of exotic vegetation species, including forestry, within Outstanding Natural Features and Landscapes..."
S8/18	Department of Conservation	NFL-P13	Oppose	(Oppose in part) It is considered appropriate for ONF's to be included within this policy. However, it is important that accumulative effects are considered when forming this assessment.	Amend policy to read: "To avoid subdivision within Outstanding Natural <u>Features and</u> Landscapes except where..."
S8/19	Department of Conservation	NFL-P14	Oppose	(Oppose in part) It is considered ONF's should be included in NFL-P13 instead to be consistent with s6(b). SAF's are contained within NFL-APP2 not APP1.	Remove ONF's from wording of Policy NFL-14 and edit reference for SAF's from NFL-APP1 to NFL-APP2 as follows: "To manage subdivision within <del>Outstanding Natural Features</del> and Significant Amenity Features to ensure the characteristics and values identified in NFL-APP4 <del>2</del> are not adversely affected by fragmentation of ownership arising from subdivision."
S8/20	Department of Conservation	NFL-P15	Support	This is considered appropriate.	Retain this policy.
S8/21	Department of Conservation	NFL-P16	Support	This is considered appropriate.	Retain this policy.
S8/22	Department of Conservation	NFL-P17	Support	This is considered appropriate.	Retain this policy.
S8/23	Department of Conservation	NFL-P18	Support	This is considered appropriate.	Retain this policy.
S8/24	Department of Conservation	Policies – general comment	Oppose	(NFL-P19) The introduction of exotic species would likely affect the characteristics and values of the areas and undermines the potential for these areas to be maintained and enhanced. Wording should be changed to avoid where they adversely affect the characteristics and values identified in NFL-APP2.	Amend policy to read: "To <u>avoid</u> <del>restrict</del> the introduction of exotic vegetation species, including forestry, within Significant Amenity Features where they adversely affect the characteristics and values identified in NFL-APP2."
S8/25	Department of Conservation	NFL-R1	Support	These rules are considered appropriate.	Retain these rules.

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S8/26	Department of Conservation	NFL-R2	Support	These rules are considered appropriate.	Retain these rules.
S8/27	Department of Conservation	NFL-R3	Support	These rules are considered appropriate.	Retain these rules.
S8/28	Department of Conservation	NFL-R4	Support	These rules are considered appropriate.	Retain these rules.
S8/29	Department of Conservation	NFL-R5	Support	These rules are considered appropriate.	Retain these rules.
S8/30	Department of Conservation	NFL-R6	Support	These rules are considered appropriate.	Retain these rules.
S8/31	Department of Conservation	NFL-R7	Support	These rules are considered appropriate.	Retain these rules.
S8/32	Department of Conservation	NFL-R8	Support	These rules are considered appropriate.	Retain these rules.
S8/33	Department of Conservation	NFL-R9	Oppose	(Oppose in part) NFL-R9 allows for earthworks associated with stock grazing within the Rangitikei River Outstanding Natural Feature and within Significant Amenity Features. It is considered that earthworks 'associated' with these activities could be exceptionally broad and that measurable standards must be set for permitted volumes in relation to this activity specifically.	Amend the rule to include measurable standards for volumes and/or descriptions of types of earthworks to be associated with grazing.
S8/34	Department of Conservation	NFL-R10	Support	This is considered appropriate.	Retain this rule.
S8/35	Department of Conservation	NFL-R11	Support	This is considered appropriate.	Retain this rule.
S8/36	Department of Conservation	NFL-R12	Support	This is considered appropriate.	Retain this rule.
S8/37	Department of Conservation	NFL-R13	Support	This is considered appropriate.	Retain this rule.

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S8/38	Department of Conservation	NFL-R14	Support	This is considered appropriate.	Retain this rule.
S8/39	Department of Conservation	NFL-R15	Support	This is considered appropriate.	Retain this rule.
S8/40	Department of Conservation	NFL-R16	Support	This is considered appropriate.	Retain this rule.
S8/41	Department of Conservation	NFL-R17	Support	This is considered appropriate.	Retain this rule.
S8/42	Department of Conservation	NFL-R18	Support	This is considered appropriate.	Retain this rule.
S8/43	Department of Conservation	Policy 1.5	Support	This is considered appropriate. It is consistent with the purpose of s7(c) for the maintenance of amenity values.	Retain this policy.
S8/44	Department of Conservation	Objective 3	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this objective.
S8/45	Department of Conservation	Policy 3.1	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this policy.
S8/46	Department of Conservation	Policy 3.2	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this policy.
S8/47	Department of Conservation	Policy 3.3	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this policy.
S8/48	Department of Conservation	Policy 3.4	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this policy.
S8/49	Department of Conservation	Policy 3.5	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this policy.
S8/50	Department of Conservation	Policy 3.6	Support	This is considered appropriate. It is consistent with the purpose of s6(b) for the protection of ONFL's from inappropriate use and development.	Retain this policy.

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S8/51	Department of Conservation	Rule 3A.4.3.j	Support	This is considered appropriate.	Retain this standard.
S8/52	Department of Conservation	Rule 3A.4.4 Assessment criteria vi)	Support	This is considered appropriate.	Retain this rule.
S8/53	Department of Conservation	Rule 3A.4.5 Discretionary activity	Oppose	It is considered appropriate for new activities within ONF's to be non-complying activities to be consistent with s6(b) and the below rule.	Amend rule to read: "Any new network utility, including windfarms and new transmission and distribution electricity lines within any <del>Outstanding Natural Feature as identified in NFL-APP1 or</del> Significant Amenity Feature identified in NFL-APP2."
S8/54	Department of Conservation	Rule 3A.4.6 Non Complying activity	Oppose	It is considered appropriate for new activities within ONF's to be included within the non-complying activities to be consistent with s6(b).	Amend the rule to read: "Any new network utility, including windfarms and new transmission and distribution electricity lines located within an Outstanding Natural <u>Feature or Landscape</u> identified in NFP-APP1 is a Non-Complying Activity."
S8/55	Department of Conservation	Policy 1.3	Support	This is considered appropriate.	Retain this standard.
S8/56	Department of Conservation	Rule 3D.4.4 discretionary activity	Oppose	It is considered appropriate for earthworks within ONF's to be non-complying activities to be consistent with s6(b) and the below rule.	Amend rule to read: "Any earthworks within an <del>Outstanding Natural Feature identified in NFL-APP1 or</del> Significant Amenity Feature identified in NFL-APP2."
S8/57	Department of Conservation	Rule 3D.4.5 non-complying activity	Oppose	It is considered appropriate for earthworks within ONF's to be included within the non-complying activities to be consistent with s6(b).	Amend rule to read: "Any earthworks within an Outstanding Natural <u>Feature or Landscape</u> identified in NFL-APP1, except within an existing road corridor, or in the National Grid Yard that do not comply with 3D.4.2f.v) or vi) is a Non-Complying Activity."

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S9/1	Forest and Bird	Objectives – general comment	Unstated	Is it not clear whether features are intended to be a subset of natural features and therefore could give effect to aspects of Policy 15(b) of the NZCPS or more specifically identified for amenity values in regard to s7 other matters in the RMA. Supports rule status for afforestation in SAFs, however there is uncertainty as to whether more stringent rules is consistent with the NESPF.	Add a new definition as follows: <u>"Significant Amenity features means those areas identified in APP2 as having amenity values and characteristics that distinguish them from the wider rural area. APP2 describes and recognises the visual amenity values (i.e perceptual and aesthetic aspects) location and description consistent with a visual amenity landscape under the NESPF."</u>  Ensure adequate protection is provided through retaining outstanding landscape feature and significant area classifications.
S9/2	Forest and Bird	Objectives – general comment	Unstated	Approach to inappropriate use and development in plan is confusion and potentially inconsistent with case law. NLF-P3 sets to avoid inappropriate use and development, however its unclear how this is determined and whether adverse effects are acceptable, or why this is different to other policies such as P7. Submitter has concerns that Objectives 2 and 3 protect the characteristics and values of ONFLs rather than protection of the ONFL.	Remove the policy approach to 'inappropriate use and development' by deleting P2.
S9/3	Forest and Bird	Objectives – general comment	Unstated	The policy direction in PC65 does not give effect to Policy 15 of the NZCPS (relating to the coastal environment). There is no policy direction to avoid adverse effects on ONFLs specific to the coastal environment or otherwise. There is no clear policy approach towards natural landscapes and features which are not outstanding.	Add policy direction to give effect to Policy 15 of the NZCPS (see specific changes in rest of submission). Amend the objectives to provide for protection by removing reference to characteristics and outcomes as sought in relation to other submission points.
S9/4	Forest and Bird	Objectives – general comment	Unstated	There is inconsistency and uncertainty in way plan sets out to identify and protect ONF, ONLs and SAFs with respect to the characteristic and values. Approach to identifying characteristics and values which contribute to the natural of the landscapes and features may be a pragmatic approach however the wording of some policies is potentially inconsistent with s6 and the NZCPS. Also uncertainty as to whether all relevant and necessary characteristics and values are identified in APP1. Policy direction in P1 applies criteria to identify characteristics and values, there is an issue that the matters are not applicable as criteria. They are a list of factors or features that need to be considered.	Amend policies to provide direction for the protection of the landscape or features, rather than the characteristics and values. Consider policy wording for effects to be considered against the characteristics and values such that protection is achieved (also see specific relief elsewhere in submission). Amend Policy P1 to align the factors set out with APP1 (see amendment later in submission). Clarify the use of acronyms and terminology for ONFLs, ONLs, and ONFs to along with policy wording for outstanding natural landscapes and outstanding natural features. For example it is



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					confusing when the appendix uses a mix of acronyms that are not used in the policy wording.
S9/5	Forest and Bird	Appendix 1 – general comments	Unstated	There is inconsistency and uncertainty in way plan sets out to identify and protect ONF, ONLs and SAFs with respect to the characteristic and values. Approach to identifying characteristics and values which contribute to the natural of the landscapes and features may be a pragmatic approach however the wording of some policies is potentially inconsistent with s6 and the NZCPS. Also uncertainty as to whether all relevant and necessary characteristics and values are identified in APP1.	<p>Amend the plan to provide a comprehensive identification of characteristics and values, including reference to technical reports where relevant and allow for further identification of effects against the criteria /matters set out in policy for identification of characteristics and values.</p> <p>Amend the first paragraph:  "<u>NFL - APP1 describes the characteristics and values individual natural, perceptual and associational values of all listed Outstanding Natural Features and Landscapes of landscape and features applying the matters in Policy P1.</u>"</p> <p>Amend the second paragraph:  "<u>The intention of listing-identifying individual characterises and values within NFL-APP1 of the Manawatu District Plan is to provide support to plan users in determining the extent of a proposed activity's potential effects within an Outstanding Natural Feature and Landscape. While these tables are intended to be thorough, there may be additional characteristics and values which become apparent in future assessments when considering the matters in P1.</u>"</p> <p>Amend the heading in APP1 tables "Features of Outstanding Natural Landscape" to "<u>Characteristics and Values of Outstanding Natural Landscape</u>".</p> <p>Amend the heading of APP1 tables "Features of Outstanding Natural Feature" to "<u>Characteristics and Values of Outstanding Natural Feature</u>".</p>

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S9/6	Forest and Bird	Objectives – general comment	Unstated	PC65 includes consequential changes to Appendix 1B Significant Areas of Indigenous Forest/Vegetation (Excluding reserves) which would remove a number of Significant Areas from that schedule on the basis of the areas being identified within an ONFL or SAF. Concerned policy approach for ONFLs would not necessarily provide appropriate protection for a significant area. Level of protection is less for SAF than ONFLs.	Retain the Appendix 1B areas identified and ensure the Maps show all applicable overlays. Ensure the matter of discretion in RD rules provide scope for considering effects relating to a Significant Area where this is within an ONFL.
S9/7	Forest and Bird	NFL-O1	Support	(Support in part) Identifying these areas in the district plan is supported, however, this is already provided for under Policy P1 and P2. Identification through policy direction appropriately supports achieving the protection set out in other objectives.	Delete O1: " <del>Outstanding Natural Features and Landscapes and Significant Amenity Features are identified within the Manawatū District.</del> "
S9/8	Forest and Bird	NFL-O2	Support	(Support in part) The objective to protect character and values is inconsistent with section 6(b) of the RMA and the NZCPS. The objective should be consistent with s6 rather than suggesting a different outcome which may not be. However, policy direction to achieve the objective may take a character and value approach if this has been determined by experts to achieve protection. For example, where avoiding, remedying or mitigating adverse effects on the character and values would achieve the objective to protect the ONFL. Section 6(b) includes protection from inappropriate subdivision.	Amend O2 as follows: <del>"The characteristics and values of the Outstanding Natural Features and Landscapes identified in NFL APP1 are protected from inappropriate subdivision, use and development."</del>
S9/9	Forest and Bird	NFL-O3	Support	(Support in part) As for O2 above, s6(b) requires the protection of the feature or landscape. Section 6(b) includes protection from inappropriate subdivision. Limiting the objective to only protecting from fragmentation of ownership from subdivision is inconsistent with s6(b) and in the coastal environment does not give effect to Policy 15 of the NZCPS. Avoiding the adverse effects of fragmentation is appropriate as a policy response to achieve O2 and which can in turn be implemented by rules restricting subdivision in ONFLs.	Delete O3: " <del>The characteristics and values of Outstanding Natural Features and Landscapes and Significant Amenity Features are protected from the fragmentation of ownership arising from subdivision.</del> "  Add a policy to avoid adverse effects of fragmentation.  Add a rule to restrict subdivision which would cause adverse effects of fragmentation in ONFLs.
S9/10	Forest and Bird	NFL-O4	Support	(Support in part) As for O2 above, s6(b) requires the protection of the feature or landscape. However, the focus of enhancement on character and values would be consistent with O2 as amended above. Together, the objectives provide outcomes for protection of the ONLF and enhancement of the character and values of ONLFs. Significant Amenity Features which do not	Amend O4 as follows: <del>"Enhance t</del> The characteristics and values of Outstanding Natural Features and Landscapes, <u>and maintain or enhance Significant Amenity Features are maintained or enhanced.</u> "

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				appear to be a s6 matter and the objective is to maintain or enhance them.	
S9/11	Forest and Bird	NFL-P1	Support	(Support in part) It is not really a criterion which identification can be consistent with. While it may not be practical to use a criterion as landscape assessments may be somewhat subjective, the list of matters must reflect those used by experts for the purposes of identifying natural features and natural landscapes and for the purpose of identifying which are outstanding. Given that this plan includes the coastal environment, the list of matters needs to include those set out in Policy 15 of the NZCPS. This includes the presence of water and vegetation being specifically recognised rather than relying on it being captured within other terms (e.g. hydrology and biological) as is currently the case. The list of matters should be the same as that applied by the expert assessments when they identified the ONFLs in APP1. However, the matters set out in APP1 are not the same as listed here. For clarity, the matters listed in P1 and applied in APP1 should be the same. If Council were minded to provide a criterion, this would need the input of expert advice. For example, a criterion for identifying significant indigenous biodiversity reads: Rarity/Distinctiveness (a) Indigenous vegetation or habitat of indigenous fauna that has been reduced to less than 20% of its former extent in the Region, or relevant land environment, ecological district, freshwater environment, or coastal biogeographic region.	Amend Policy 1 as follows: "To identify the characteristics and values, and spatially define Outstanding Natural Features and Landscapes <del>consistent with</del> <u>respect to all of the following criteria:</u> a. Natural science factors: <u>- Geological/ Geomorphological;</u> <u>- Biological / Ecological;</u> <u>- Hydrological.]</u> b. <del>Aesthetic values</del> <u>Perceptual:</u> <u>- the presence of water;</u> <u>- memorable;</u> <u>- legibility/expressiveness legibility;</u> <del>d - transient values;</del> <u>- aesthetic values;</u> <u>- naturalness;</u> <u>- vegetation;</u> e. <u>Associational:</u> <u>- Historic;</u> <u>- Recreation;</u> <u>- Tangata Whenua;</u> <u>- Shared and recognised values</u> <del>f. cultural and spiritual values for tangata whenua</del> <del>g. historic heritage values"</del>
S9/12	Forest and Bird	NFL-P2	Support	(Support in part) It is uncertain upon what basis these features are defined under the Policy. While Appendix NFL- APP2 describes a similar approach and lists the same matters as APP1, this seems inconsistent with the subject of "amenity" which suggests a different focus from the identification of natural features.	Amend P2 to clarify what Significant Amenity Features are so that it is clear what purpose of identifying such features. Identify and spatially define Significant Amenity Features.

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S9/13	Forest and Bird	NFL-P3	Oppose	This policy is confusing. The wording suggests that inappropriate use and development which doesn't adversely affect the identified values and characteristic is ok. The wording is not consistent with King Salmon decision which considered that inappropriate is to be determined on the basis of what is to be protected. The inclusion of the unbuild coastal strip and unmodified ridges and hill tops implies that subdivision should also be captured by the policy. The policy appears to be inverse of Policy P4 below, with the addition of some specific values and characteristics. If these values and characteristics are identified in APP1, there seems to be no need to specifically identify them in policy.	Delete P3. <del>To avoid inappropriate use and development within outstanding natural features identified in NFL-APP1 which adversely affects the identified characteristics and values and characteristics of the areas, including:</del> a. <del>the extensive unbuild coastal strip along the Manawatu Coastal Outstanding Natural Landscape.</del> b. <del>the unmodified and continuous indigenous vegetation values and the ridges and hilltops of the Ruahine Ranges Outstanding Natural Landscape.</del>
S9/14	Forest and Bird	NFL-P4	Oppose	While we would generally support policy direction to restrict activities which may adversely affect the characteristic and values of ONFLs, to ensure that ONFLs are protected, the wording of the policy is inconsistent with other policy which directs the avoidance of adverse effects. The absence of "subdivision" in the policy as it means there is no direction restricting subdivision other than for the purposes in P13 and P14. This is resolved by the changes sought to P6 and the addition of new policy P6A and P7.	Delete P4.
S9/15	Forest and Bird	NFL-P5	Support	(Support in part) The current policy wording suggests that the existing farming activities contribute to the outstanding natural feature. For consistency with the characteristics and value description in APP1, the policy should recognise the feature within the context of existing farming. The policy also needs to provide for protection consistent with changes sought to the objectives.	Amend as follows: "To recognise the Rangitikei River Outstanding Natural Feature <u>includes in the context of</u> existing farming activities and <del>provide for</del> that the continuation of these existing activities where they do not adversely affect the characteristics and values identified in NFL-APP1 <u>and where this provides for protection of the ONF.</u> "
S9/16	Forest and Bird	NFL-P6	Unstated	(New policy P6A) Add a new policy to give effect to Policy 15(a) of the NZCPS.	Add a new policy as follows: <u>"In the coastal environment:</u> <u>(a) avoid adverse effects of activities on Outstanding Natural Features and Outstanding Natural Landscapes;</u> <u>(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on other natural features and natural landscapes."</u>

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S9/17	Forest and Bird	NFL-P6	Support	(Support in part) As written, the PC65 policy is inconsistent with Policy 15(b) of the NZCPS because it specifically addresses "cumulative" rather than the avoidance of all significant adverse effects. "Cumulative effects" are captured within the RMA interpretation of "effect" and do not need to be singled out. While a specific approach to cumulative effects outside the coastal environment could be applied, it is uncertain as to why a significant cumulative adverse effect must be avoided under P6 when under P7, a significant adverse effect that is not cumulative could be remedied or mitigated. This distinction of "cumulative", also makes it uncertain how P6 and P7 can be reconciled as: P6 is about: (a) significant cumulative adverse effects; and (b) effects on characteristics and values; whereas P7 is about: (a) adverse effects; and (b) effects on the features and landscapes.	Delete or amend to apply outside the coastal environment as follows: <del>To avoid significant cumulative adverse effects from activities use and development on the characteristics and values of Outstanding Natural Features and Landscapes identified in NFL-APP1.</del> <u>"Beyond the coastal environment, To avoid significant cumulative adverse effects from activities use and development on the characteristics and values of Outstanding Natural Features and Landscapes identified in NFL-APP1."</u>
S9/18	Forest and Bird	NFL-P7	Support	(Support in part) This policy is supported where policy P6 is amended to avoid significant adverse effects and the coastal environment is specifically provided for by a new policy as sought in this submission. A minor amendment is required so that the consideration of effects to be remedied or mitigated is not limited solely to those identified in APP1. In applying P1 through the consent process and expert may identify additional values or find that identified values have changed.	Amend as follows: "Except as required by NFL-P6, avoid adverse effects on Outstanding Natural Features and Landscapes as far as reasonably practicable and where avoidance is not reasonably practicable, remedy or mitigate adverse effects on the characteristics and values of ONFLs identified in NFL-APP1."
S9/19	Forest and Bird	NFL-P8	Support	An enabling approach to provide for s6(d), (e) and (g) and conservation which is consistent with other s6 matters is supported where the characteristics and values that make the area outstanding are protected. Appropriate conditions will need to be specified in any permitted activity rules.	Retain P8.
S9/20	Forest and Bird	NFL-P9	Support	This policy is appropriate.	Retain P9.
S9/21	Forest and Bird	NFL-P10	Support	This policy is appropriate.	Retain P10.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S9/22	Forest and Bird	NFL-P11	Support	Council has a responsibility to protect natural features and landscapes in the coastal environment and to protect outstanding natural landscapes beyond that and this includes the indigenous vegetation which contributes to the natural features and landscapes. Council's responsibility to protect indigenous biodiversity (NZCPS) and significant indigenous vegetation and habitat s6(c) must also be recognised and provided for when restricting and managing activities within natural landscapes and features.	Retain P11.
S9/23	Forest and Bird	NFL-P12	Support	(Support in part) This policy should also apply to Significant Amenity features. Where these features are identified as having visual amenity district plans can restrict plantation forestry activities which could otherwise not be restricted via provisions in the district plan under the NES PF.	Amend P12: "To restrict the introduction of exotic vegetation species, including forestry, within Outstanding Natural Features and Landscapes identified in NFL-APP1 <u>and Significant Amenity Features identified in NFL-APP2.</u> "
S9/24	Forest and Bird	NFL-P13	Support	(Support in part) This policy requires clarification to ensure consistency with the NCPS. The relationship with other policy is not clear. The exception makes the policy hard to understand.	Amend P13 as follows: "To avoid subdivision within Outstanding Natural Landscapes <u>consistent with P6A, P6 and P7 above and except</u> where the fragmentation of land <del>does not</del> <u>would</u> significantly affect the characteristics and values of the Landscape identified in NFL-APP1."
S9/25	Forest and Bird	NFL-P14	Support	(Support in part) To ensure characteristics and values are not adversely affected may require restrictions not just management of effects. The wording as to the purpose of restricting subdivision can also be aligned with policy P13 to avoid uncertainty.	Amend P14 as follows: "To <del>manage</del> <u>restrict</u> subdivision within Outstanding Natural Features and Significant Amenity Features <u>where the fragmentation of land would adversely affect to ensure</u> the characteristics and values <u>of the Feature</u> identified in NFL-APP1 <del>are not adversely affected by fragmentation of ownership arising from subdivision.</del> "
S9/26	Forest and Bird	NFL-P15	Support	Indigenous vegetation is an important characteristic of natural landscapes and features and protecting it ensures the maintenance of indigenous biodiversity.	Retain P15.
S9/27	Forest and Bird	NFL-P16	Support	It is preferable to use plant species which are local to the area.	Retain P16.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S9/28	Forest and Bird	NFL-P17	Support	(Support in part) The word "enable" is inappropriate as it suggests other actions may be taken to enable the activity rather than just allowing it can continue in these circumstances. The word "compromise" is uncertain and does not reflect the wording of Part 2, which considers adverse effects. Providing for these activities where they do not compromise the protection of SAF is acceptable so long as this does not override the councils other responsibilities and functions. The policy suggests that all relevant characteristic and values are identified in the appendix. However, APP2 states that it is intended to support plan users to determining the extent of the effects, that saying it is the only this to be considered. There does not appear to be any identification of characteristics. The table set out features which include reference to values and in some cases acknowledge that there may be other values.	Delete or amend as follows: "To <del>enable</del> <u>provide for</u> the continuation of existing stock grazing within <u>an identified</u> Significant Amenity Features <u>in NFL-APP2</u> where this does not <del>compromise</del> <u>adversely affect</u> the characteristics and values of <u>the feature</u> identified in NFL-APP2."
S9/29	Forest and Bird	NFL-P18	Support	(Support in part) Support the intent of the policy which appears to be to ensure use and development does not adversely affect the characteristics and values of SAF's. The policy requires clarification as the term restrict aligns with the policy wording to the activities. A definition is also required to explain what a Significant Amenity Feature is. In particular, this needs to set out the basis for identifying these areas in terms of visual amenity. Areas described in district plans with visual amenity have particular standing under the NES for plantation forestry. This appears to be the basis for applying Rule NFL-R17, however, clarification in terms of visual amenity must be included in the plan to ensure consistency with the NES.	Amend the policy. "To <del>control</del> <u>restrict</u> use and development within Significant Amenity Features to those activities which do not adversely affect the characteristics and values identified in NFL-APP2."  Add a definition for Significant Amenity Feature.
S9/30	Forest and Bird		Support	NFL-P19 (Support in part) For clarity and consistency incorporate this policy into P12 above. In order to restrict plantation forestry in SAFs, the plan needs to define the SAF as an area with visual amenity values.	Delete P19 and combine into P12 above. <del>To restrict the introduction of exotic vegetation species, including forestry, within Significant Amenity Features identified in NFL-APP2.</del>
S9/31	Forest and Bird	NFL-R1	Support	This rule is appropriate.	Retain R1.
S9/32	Forest and Bird	NFL-R2	Support	This rule is appropriate.	Retain R2.
S9/33	Forest and Bird	NFL-R3	Support	This rule is appropriate.	Retain R3.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S9/34	Forest and Bird	NFL-R4	Support	(Support in part) This rule needs clarification as it could result in fences creating fragmentation within an ONFL. It needs to be clear that the "area" is the entirety of an ONFL within a property.	Amend as follows. "Fencing off of areas <u>of entire ONFLs.</u> "
S9/35	Forest and Bird	NFL-R5	Support	This rule is appropriate.	Retain.
S9/36	Forest and Bird	NFL-R6	Oppose	Uncertain and too broad as to the potential adverse effects that could be generated through 'maintenance'. There need to be limits to the extent of maintenance activities. For example, there is no limit to the extent of vegetation that could be cleared for the purpose of 'maintenance'. Requirements for maintenance could be interpreted differently by different people. Forest & Bird is concerned about how rule applies to identified SNAs which are within the ONFLs or SAFs.	Amend to include limits to maintenance activities.
S9/37	Forest and Bird	NFL-R7	Oppose	This rule is inappropriate as a permitted activity. The council should require an effects assessment for a new structure in an ONFL.	Amend to make a discretionary activity.
S9/38	Forest and Bird	NFL-R8	Support	(Support in part) This rule could result in destruction of indigenous vegetation with significant values. New clearance of vegetation within this area should be restricted.	Amend as follows: "Continuation of existing stock grazing within <u>existing grazed areas of the Rangitikei River Outstanding Natural Feature and within Significant Amenity Features as at 7 February 2020.</u> "
S9/39	Forest and Bird	NFL-R9	Support	(Support in part) This rule should not result in allowing additional vegetation clearance as a result of earthworks. This rule is only acceptable when there are appropriate limits to vegetation clearance within the permitted activities above.	Retain on the basis of amendments sought above.
S9/40	Forest and Bird	NFL-R10	Oppose	Relying solely on management plans does not take into account the responsibilities under s6(c) of the RMA. Council has functions and responsibilities under the RMA and shouldn't defer to the Reserves Act for the purposes of ONFL protection. There are SNAs within the identified ONFLs.	Delete.
S9/41	Forest and Bird	NFL-R11	Oppose	There needs to be public notification associated with subdivision within an ONFL to recognise public interest in the matter of national importance.	Add a public notification requirement or amend to non-complying activity status.
S9/42	Forest and Bird	NFL-R12	Support	(Support in part) This rule is only acceptable as long as Policy 15 remains in the Plan and policies are amended to give effect to the NZCPS. ONFLs and SAFs are important for biodiversity, habitat and vegetation in their own right.	Retain on the basis that there is policy that provides for the protection of indigenous vegetation and habitat.



No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S9/43	Forest and Bird	NFL-R13	Support	(Support in part) This rule is only acceptable as long as Policy 15 remains in the Plan and policies are amended to give effect to the NZCPS. ONFLs and SAFs are important for biodiversity, habitat and vegetation in their own right.	Retain on the basis that there is policy that provides for the protection of indigenous vegetation and habitat.
S9/44	Forest and Bird	NFL-R14	Support	This rule is appropriate.	Retain.
S9/45	Forest and Bird	NFL-R15	Support	This rule is appropriate.	Retain.
S9/46	Forest and Bird	NFL-R16	Support	This rule is appropriate.	Retain.
S9/47	Forest and Bird	NFL-R17	Support	This rule is appropriate.	Retain.
S9/48	Forest and Bird	NFL-R18	Support	This rule is appropriate.	Retain.
S9/49	Forest and Bird	Rules – general comment	Support	The guidance notes under non-complying activities are appropriate.	Retain.
S9/50	Forest and Bird	Appendix 1B	Oppose	Significant areas of indigenous forest/vegetation - SA10, 37, 40 and 41 identified in the Landscape Assessment as within an ONFL or SAF. The policy direction for ONFLs and SAFs cannot appropriately be relied upon to protect s6(c) areas. It is appropriate for these areas to remain identified in the district plan. The rules also need to retain discretion (which they generally do) for decision makers can consider other matters (s104XXX) such as the RPS where an activity in an ONLF or SAF is also within an Appendix IB area. The plan may also be assisted by a guidance note referring to indigenous vegetation managed under the One Plan.	Retain the areas which are SNA in Appendix IB.
S9/51	Forest and Bird	Appendix 1 – general comments	Support	(Support in part) For the reasons set out in key issues: Achieving protection via characteristics and values: refer to earlier submission points.	See amendments at Paragraph 32 in key issues above: refer to previous submission points.
S10/1	Powerco	functional need definition	Support	(Functional need) Powerco supports the definition insofar as it provides for Powerco's functional need to locate their assets in a particular location, i.e. there is nowhere else it can be located. It is consistent with the national planning standards.	Retain the definition.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/2	Powerco	functional need definition	Support	(Operational need) The definition of 'operational need' is generally supported and is appropriate, as it applies to Powerco's assets and recognises their operational requirement to locate in a particular location. It is consistent with the national planning standards.	Retain the definition.
S10/3	Powerco	Policy 1.5	Unstated	Powerco maintains its previous submission point in relation to Policy 1.5. The requirement to "ensure" construction and location that is sensitive to the amenity and landscape values is quite directive, particularly when read in contrast to Policy 1.4 which only requires the recognition of locational requirements. Powerco considers that the Policy intent would better be achieved by the deletion of the notified Policy 1.5 and the inclusion of a new Policy 1.5. The proposed amendments to Policy 1.5 by " <i>including those areas identified as Significant Amenity Features in NFL-APP2.</i> " further exacerbates the directness of the policy. There is no acknowledgement of the balance between these potential effects and the benefits network utilities provide to the social, economic and wellbeing of a community, by recognising that it is only the significant adverse effects that need to be avoided, remedied or mitigated.	Insert a new Policy (1.5) that recognises that the significant effects on network utilities cannot always be avoided, remedied or mitigated: <u>"To ensure that significant adverse effects on environment are avoided, remedied or mitigated."</u>
S10/4	Powerco	Objective 3	Unstated	Powerco supports the amendment to Objective 3. The purpose of Objective 3 adequately recognises the development of network utilities whilst seeking to manage effects. The reference to "NFL-APP1" reduces ambiguity in the application of the objective in relation to the ONF's and ONL's. Powerco suggests minor amendments to the wording of Objective 3 to reference new network utilities and to clarify interpretation, including by adding a reference to the Appendices which include the lists of historic heritage and commas to identify that this is a compound sentence. Referencing "use and development" is unnecessarily restrictive for maintenance and upgrading of existing assets. Notwithstanding the proposed amendments to Objective 3, duplication remains between Objective 3 and Policy 3.1, as addressed in the next submission point.	Amend Objective 3 to clarify historic heritage appendices, as follows: "The characteristics and values of the Outstanding Natural Features and Landscapes <u>identified</u> in Appendix NFL-APP1 and historic heritage <u>identified</u> in Appendix 1F and 1E, are protected from the inappropriate <del>use and</del> development of <u>new</u> network utilities."

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/5	Powerco	Policy 3.1	Unstated	Powerco maintains its previous submission point in relation to Policy 3.1, insofar as its intent and purpose is incorporated into Objective 3 and it is simply a duplication. Delete Policy 3.1. In addition, Policy 3.1 is more restrictive than Objective 3.	Delete Policy 3.1 as this policy is now incorporated into amendments sought to Objective 3. <del>To protect the characteristics and values of Outstanding Natural Features and Landscapes scheduled in NFL-APP1 or a site of historic heritage scheduled in Appendix 1E (Buildings and Object with Heritage Value) and 1F (Sites with Heritage Value) from the effects of network utilities.</del>
S10/6	Powerco	Policy 3.2	Unstated	Powerco understands that the intent of Policy 3.2 is to manage the cumulative effects of new network utilities. Powerco's previous submission point in relation to the draft Plan Change 65 remains, insofar as it may be difficult to interpret in terms of determining significant adverse cumulative effects. Part of an ONF's and ONL's may be able to absorb new network utilities locating there if there are existing network utilities in that part of the landscape, as opposed to locating where there are none. In addition, there may also be no practicable alternative.	Retain as notified.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/7	Powerco	Policy 3.3	Unstated	<p>Policy 3.3 provides an exception to this where network utilities are unable to avoid the area as far as reasonably practicable and where works cannot be avoided in the ONF's or ONL's any adverse effects should be remedied or mitigated. The main body of Policy 3.3 does not refer specifically to new network utilities. Furthermore, it is not good practice to have a definition embedded within a policy. Policy 3.3 also provides a convoluted test with three parts to it, as set out below:  <i>"For the purpose of policy 3.3, reasonably practicable means where:</i>  <i>(a) there is no reasonably practicable alternative location, recognising the functional and operational need to the network utility; and</i>  <i>(b) the infrastructure is of national or regional importance; and</i>  <i>(c) the development does not have a significant adverse effect on the characteristics and values identified in Appendix NFL-APP1 (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or F1 (Sites with Heritage Value)."</i></p> <p>Part c of Policy 3.3 contradicts the requirement of Policy 3.3 "remedy or mitigate adverse se effects on the characteristics and values identified in NFL-APP1." by stating "development does not have a significant adverse effects on". Policy 3.3 requires two effects thresholds to be met and set out different appendices. For example, Policy 3.3 refers to NFL-APP1 whilst part c of Policy 3.3 refers to "Appendix NFL-APP1 (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or 1F (Sites with Heritage Value).</p>	<p>Amend Policy 3.3 to have one effects threshold and remove definitions within the policy and create a new policy (Policy 3.3A) recognising the functional and operational need of infrastructure:  <del>"Except as required by Policy 3.2, To avoid adverse effects from new network utilities as far as reasonably practicable, insofar as there is no reasonable alternative location, and wWhere avoidance is not reasonably practicable, remedy or mitigate adverse effects on the characteristics and values identified in Appendix NFL-APP1, (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or 1F(Sites with Heritage Value). For the purpose of policy 3.3, reasonably practicable means where:</del>  <del>(a) there is no reasonably practicable alternative location, recognising the functional and operational need to the network utility; and</del>  <del>(b) the infrastructure is of national or regional importance; and</del>  <del>(c) the development does not have a significant adverse effect on the characteristics and values identified in Appendix NFL-APP1 (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or F1 (Sites with Heritage Value)."</del></p>
S10/8	Powerco	Policy 3.4	Unstated	<p>Powerco supports Policy 3.4 as it provides for works associated with existing network utilities located within ONF's and ONL's.</p>	<p>Retain as notified.</p>

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/9	Powerco	Policy 3.5	Unstated	Policy 3.5 seeks to avoid inappropriate use and development within ONL's which adversely affects the values of the areas. Policy 3.5 is in direct contrast with Policy 3.4 as it is not clear if it is in relation to the construction of new network utilities. Policy 3.5 also generally refers to use and development, rather than specifying network utilities. Powerco acknowledges that network utilities can have adverse effects on ONL's but suggests amendments to Policy 3.5 for clarity and application of Policies 3.4 and 3.5. In addition, Policy 3.5 commands a high statutory test and effectively restricts the location of any network utilities within an ONL and more specifically the Manawatū Coastline ONL and Ruahine ONL.	Amend Policy 3.5 to clarify and soften its application, as follows: "To avoid inappropriate use and development of <u>new network utilities</u> within Outstanding Natural Landscapes which adversely affects the identified values and characteristics of the areas, and adverse effects <u>are unable to be mitigated or remedied</u> , including: (a) the extensive unbuilt coastal strip along the Manawatu Coastline Outstanding Natural Landscape. (b) the unmodified and continuous indigenous values and the ridges and hilltops of the Ruahine Ranges Outstanding Natural Landscape."
S10/10	Powerco	Rule 3A.4.3.j	Unstated	Powerco supports the amendment to the permitted activity standard 3A.4.3.j, as it references the new appendices NFL-APP1 and NFL-APP2, however, suggests "Appendices" should be included to provide clarity. A comma is required after 'minor upgrading works' to reflect the compound nature of the sentence.	Amend 3A.4.3j (standards for permitted activities) as follows: "Works that are undertaken outside of an existing road corridor carriageway, or that are not in operation, maintenance, replacement or minor upgrading works, <u>must not be located within the areas scheduled in <del>Appendix</del> Appendices 1A</u> (Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding Reserves), 1D (Trees with Heritage Value), 1E (Buildings and Objects with heritage Value), 1F (Sites with Heritage Value), Outstanding natural Features and Landscapes identified in NFL-APP1 or Significant Amenity Features identified in NFL-APP2 of this Plan."
S10/11	Powerco	Rule 3A.4.4 Assessment criteria vi)	Unstated	Powerco supports the amendment to the restricted discretionary assessment criteria vi) as it provides clarity to the location of the ONF's and ONL's, however, suggest the word "Appendices" is inserted for clarity.	Amend 3A.4.4 Restricted Discretionary Activities assessment criteria vi), as follows: "Whether the activity impacts on the scheduled heritage values in <del>Appendix</del> <u>Appendices 1A</u> (Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding reserves), 1D (Trees with Heritage Value), 1E (Buildings and Objects with Heritage Value), 1F (Sites with Heritage Value), Outstanding Natural Features and Landscapes identified in NFL-APP1 or Significant Amenity Features identified in NFL-APP2 of this Plan and, if so, how such impacts are remedied or mitigated."

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/12	Powerco	Rule 3A.4.5 Discretionary activity	Unstated	Powerco supports the reduction of activity status from non-complying activity to discretionary activity in relation to the construction of new and upgrading (other than minor upgrading) network utilities in relation to ONF's and SAF's. Amendments are suggested to insert the word "appendix" where relevant for clarity.	Amend 3A.4.5 Discretionary Activities a., as follows: "The following activities shall be a Discretionary Activity (a) Any new network utility, including windfarms and new transmission and distribution electricity lines within any Outstanding Natural Feature as identified in <u>Appendix NFL-APP1</u> or Significant Amenity Feature identified in <u>Appendix NFL-APP2</u> ."
S10/13	Powerco	Rule 3A.4.6 Non Complying activity	Unstated	Powerco maintains its previous submission in relation to Plan Change 55 with reference to this rule. Non-complying activity status pre-empts the need to weigh the protection of natural resources against the appropriate development of physical resources in order to achieve sustainable management and fails to take account the traversing of such utilities across a range of environments. When new infrastructure is proposed, a robust assessment and route selection process is undertaken. However, it is not always possible to completely avoid sensitive areas such as these.	Amend 3A.4.6 Non-Complying Activities, as follows: "Any new <u>non-linear</u> network utility, including windfarms and <del>new transmission and distribution electricity lines</del> located within Outstanding Natural Landscape identified in <u>Appendix NFL-APP1</u> ."
S10/14	Powerco	Policy 1.3	Unstated	Powerco supports Earthworks 3D Policy 1.3 as it now refers to management of risk. Suggest minor amendment to include "Appendix" reference for clarity.	Amend Policy 1.3, as follows: "To restrict earthworks in Outstanding Natural Features or Landscapes as scheduled in <u>Appendix NFL-APP1</u> , except where earthworks are necessary to manage risk to human health and safety."
S10/15	Powerco	Rule 3D.4.4 discretionary activity	Unstated	Powerco notes the exclusion of "the minor upgrading, replacement or maintenance of network utilities" within the definition of earthworks. Thereby, excluding these activities from complying with Section 3D-Earthworks. Powerco acknowledges the reduction in activity status from non-complying to discretionary in relation to earthworks located within ONF's and SAF.	Retain as notified.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/16	Powerco	Rule 3D.4.5 non-complying activity	Unstated	A non-complying activity status for earthworks is an ONL outside of an existing road corridor is opposed for the same reasons set out in section 3A.4.6 Non-Complying Activities: "Powerco maintains its previous submission in relation to Plan Change 55 with reference to this rule. Non-complying activity status pre-empted the need to weigh the protection of natural resources against the appropriate development of physical resources in order to achieve sustainable management and fails to take account the traversing of such utilities across a range of environments. When new infrastructure is proposed, a robust assessment and route selection process is undertaken. However, it is not always possible to completely avoid sensitive areas such as these."	Amend 3D.4.5 Non-Complying Activities as follows: "Any earthworks within an Outstanding Natural Landscape identified in NFL-APP1, except within an existing road corridor, or in the National Grid Yard that do not comply with 3D.4.2.f.v) or vi) is a <u>Discretionary Activity Non-Complying Activity.</u> "
S10/17	Powerco	Introduction	Unstated	Powerco previously submitted on the draft Plan Change 65. Powerco's primary concern was the relationship between the provisions contained within Chapter 3 District Wide Rule (inclusive of Chapters 3A Network Utilities and 3D Earthworks) and the new Chapter Natural Features and Landscapes. The introduction text at the start of Chapter NFL - Natural Features and Landscapes is still unclear in regard to its application in relation to network utilities. It still instructs reader to read this chapter "alongside Chapter 3A Network Utilities and Chapter 3D Earthworks". Powerco requests more clarity on the application of the provisions of this chapter in relation to those set out in Chapter 3 District Wide Rules.	Amend introductory text to NFL- Natural Features and Landscapes to provide greater clarity on how the objectives, policies and rules contained in this section apply in relation to Chapter 3A Network Utilities and Chapter 3D Earthworks, as follows: <del>"This chapter must also be read alongside Chapter 3A Network Utilities and Chapter 3D Earthworks.</del> For activities involving Network Utilities within Outstanding Natural Features and Landscapes and Significant Amenity Features the <del>more</del> <u>specific provisions in Chapter 3A Network Utilities apply and prevail over this chapter.</u> Earthworks associated with <u>network utilities</u> within Outstanding Natural Features and Landscapes are provided for in Chapter 3D Earthworks. <u>These provisions prevail over the provisions contained within this chapter.</u> "
S10/18	Powerco	Introduction	Unstated	Powerco has assumed the intent of Chapter NFL- Natural Features and Landscapes does not apply to network utilities located within ONF's, ONL's and SAF's and so has not provided submission points on it. If this understanding is incorrect and the objectives, policies and rules contained within Chapter NFL- Natural Features and Landscapes do apply to network utilities Powerco would like the opportunity to provide comment on them as they are at tension with the provisions contained within Chapters 3A Network Utilities and 3D Earthworks.	Amend introduction text as set out in the above submission point and confirm that Chapter NFL- Natural Features and Landscapes do not apply to Network Utilities. If this relief is not accepted, Powerco objects to all objectives, policies and rules in the NFL - Natural Features and Landscapes chapters, and seeks they are amended as required to appropriately and adequately provide for the establishment, maintenance, upgrading and operation of electricity distribution lines.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S10/19	Powerco	Introduction	Unstated	The identification and difference between an ONF or ONL is unclear in NFL- APP1 - Outstanding Natural Features and Landscapes. For example, "ONF 3- Rangitikei River" is referenced as an ONF by virtue of "ONF 3". However, the corresponding table heading is "Features of Outstanding Natural Landscape".	This should be updated so it is clear if the feature is one or the other or both, as some of the policies are specifically referencing one or the other. Suggest separate schedules are prepared for ONF's and ONL's (similar to SAF's).
S11/1	Bronwyn and Jason Robb	Planning Maps	Unstated	The area on the maps is neither correct nor clear enough. do not believe the flat land area should be included (which is significant). We understand the cliffs being included on the maps but not the flat area between the river and the cliffs. Also restricted by the Horizons Council.	Reconsideration of the area included in the Natural Outstanding Area. A much clearer understanding of our limits and for future possible limits regarding cropping and land use for stock grazing.
S12/1	Transpower	functional need definition	Support	Section 3 of the s32 report for PC65 states that PC65 involves a series of amendments including the addition of two new definitions to existing Chapter 2. Transpower supports the addition of the definition for the term 'Functional need' as it supports and assets interpretation of the policy and rule provisions (particularly those in Chapter 3A- Network Utilities) and it is consistent with the definition provided in the National Planning Standards.	Retain the definition of 'Functional need' as notified.
S12/2	Transpower	functional need definition	Support	(Operational need) Section 3 of the s32 report for PC65 states that PC65 involves a series of amendments including the addition of two new definitions to existing Chapter 2. Transpower supports the addition of the definition for the term 'Operational need' as it supports and assists the interpretation of the policy and rule provisions (particularly those in Chapter 3A- Network Utilities) and it is consistent with the definition provided in the National Planning Standards.	Retain the definition of 'Operational need' as notified.



No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/3	Transpower	Introduction	Support	(Support with amendment) Section 4.9.3 of the s32 report for PC65 identifies that as a result of PC55 (District Wide Rules), there is an intention that Chapter 3A (Network Utilities) will be standalone at the completion of the Sectional District Plan Review. The changes to Chapter 3A outlined by PC65 are intended to be a step towards this, in relation to ONFLs and SAFs. A specific statement is proposed in the introduction to the new NFL- Natural Features and Landscapes chapter that clarifies for activities involving network utilities within ONFLs and SALs it is the more specific provisions in Chapter 3A (Network Utilities) that apply, and provisions for earthworks within ONFLs are provided in Chapter 3D (Earthworks). Transpower supports the approach of developing a standalone chapter that addresses network utilities as it provides clarity and certainty for plan users in terms of the objective, policy and rules provisions that apply to network utilities activities (including the National Grid), including where such activities are located with ONFLs and SAFs. This approach is also considered to provide consistency with the National Planning Standards. Transpower also supports the statement in the introduction to the NFL- Natural Features and Landscapes chapter that clarifies which rule provisions apply to Network Utilities and earthworks activities within ONFLs and SAFs. Transpower requests a minor amendment to the wording of this statement to ensure clarity for plan users.	Retain the statement in the introduction to the Natural Features and Landscapes chapter that clarifies for network utilities. It is the more specific provisions in Chapter 3A that apply; and amend the wording of the last part of the statement relating to earthworks as follows: "This chapter must also read alongside Chapter 3A Network Utilities and Chapter 3D Earthworks. For activities involving Network Utilities within Outstanding Natural Features and Landscapes and Significant Amenity Features the more specific provisions in Chapter 3A Network Utilities apply. Earthworks within Outstanding Natural Features and Landscapes <u>and Significant Amenity Features</u> are provided for in Chapter 3D Earthworks."
S12/4	Transpower	NFL-O1	Neutral	Transpower generally supports the proposed Natural Features and Landscapes objectives on the basis that there are specific objectives provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL objectives.
S12/5	Transpower	NFL-O2	Neutral	Transpower generally supports the proposed Natural Features and Landscapes objectives on the basis that there are specific objectives provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL objectives.
S12/6	Transpower	NFL-O3	Neutral	Transpower generally supports the proposed Natural Features and Landscapes objectives on the basis that there are specific objectives provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL objectives.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/7	Transpower	NFL-O4	Unstated	Transpower generally supports the proposed Natural Features and Landscapes objectives on the basis that there are specific objectives provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL objectives.
S12/8	Transpower	NFL-P1	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/9	Transpower	NFL-P2	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/10	Transpower	NFL-P3	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/11	Transpower	NFL-P4	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/12	Transpower	NFL-P5	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/13	Transpower	NFL-P6	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/14	Transpower	NFL-P7	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/15	Transpower	NFL-P8	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/16	Transpower	NFL-P9	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/17	Transpower	NFL-P10	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/18	Transpower	NFL-P11	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/19	Transpower	NFL-P12	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/20	Transpower	NFL-P13	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/21	Transpower	NFL-P14	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/22	Transpower	NFL-P15	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/23	Transpower	NFL-P16	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/24	Transpower	NFL-P17	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/25	Transpower	NFL-P18	Neutral	Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/26	Transpower	Policies – general comment	Neutral	(NFL-P19) Transpower generally supports the proposed Natural Features and Landscapes policies on the basis that there are specific policies provided for Network Utilities in Chapter 3A of the plan (as amended by PC65).	Retain NFL policies.
S12/27	Transpower	Rules – general comment	Support	(Support with amendment) Transpower supports the statement under the 'Rules' heading that clarifies which rule provisions apply to Network Utilities and earthworks activities within ONFLs and SAFs. Transpower requests a minor amendment to the wording of this statement to ensure clarity for plan users.	Amend the last part of the introductory statement under the 'Rules' heading as follows: "Unless otherwise stated, rules in this chapter apply to all activities within the areas identified as being Outstanding Natural Features and Landscapes, and Significant Amenity Features as spatially defined in Appendix NFL-APP1 and NFL-APP2. For activities involving Network Utilities within Outstanding Natural Features and Landscapes, the more specific provisions in Chapter 3A Network Utilities apply. Earthworks within Outstanding Natural Features and Landscapes <u>and Significant Amenity Features</u> are provided for in Chapter 3D Earthworks."
S12/28	Transpower	Policy 1.5	Support	(Support with amendment) Policy 1.5 has been amended to include specific reference to " <i>those areas identified as Significant Amenity Features in NFL-APP2</i> " in order to (as detailed in the s32 report) clearly provide for SAFs in the policy framework and to recognise the differences in their characteristics and values compared with ONFLs. While the proposed reference to SAF's in Policy 1.5 is not opposed, Transpower is concerned how the policy will be applied given the directive nature of the word 'ensure' and the subjective nature of the wording "in a manner sensitive to...". Given Policy 1.5 is the only policy specific to Network Utilities within SAF's, Transpower seeks amendment to the proposed wording to reference the benefits and operational constraints of the National Grid to ensure the NPSET is given effect.	Amend Policy 1.5 as follows: "To ensure network utilities are constructed and located in a manner sensitive to the amenity and landscape values where they are located, <u>including those areas identified as Significant Amenity Features in NFL-APP2, acknowledging the benefits, and locational, technical and operational requirements of the National Grid.</u> "

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/29	Transpower	Objective 3	Support	<p>The s32 report states that Objective 3 has been amended to provide consistency with the proposed Natural Features and Landscapes chapter and with the National Planning Standards, and states that the overall intent of Objective 3 has not changed since it was introduced under PC55. Transpower notes that Objective 3 is one of the provisions currently on hold pending the review of provisions under PC65. The s32 report also states that this change is considered to provide plan users with greater certainty (an outcome sought from the appeal on PC55). Objective 3 has been reworded to clarify it specifically relates to the protection of the characteristics and values of the ONFLs identified in NFL-APP1 (and historic heritage) from the inappropriate use and development of network utilities. Transpower supports the reference to "inappropriate use and development" and notes that this provides consistency with the proposed objectives in the new Natural Features and Landscapes chapter, particularly NFL-O2.</p>	Retain Objective 3 as amended.
S12/30	Transpower	Policy 3.1	Neutral	<p>Transpower supports Policy 3.1 on the basis of the provision of a National Grid specific policy (i.e. Policy 3.6) that is amended to be consistent with the relief sought by Transpower.</p>	Retain Policy 3.1 on the basis of the provision of a National Grid specific policy (Policy 3.6) in Chapter 3A that is amended to be consistent with the relief sought by Transpower.
S12/31	Transpower	Policy 3.2	Neutral	<p>Transpower supports the inclusion of the word "significant" in Policy 3.2 in the context of adverse cumulative effects.</p>	Retain the reference to "significant" within Policy 3.2 in relation to adverse cumulative effects.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/32	Transpower	Policy 3.3	Neutral	<p>Transpower supports Policy 3.3 on the basis of the provision of a National Grid specific policy (Policy 3.6) that gives effect to the NPSET. Policy 8 of the NPSET directs that within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain identified environments (being outstanding natural landscapes, area of high natural character and recreation values and amenity and existing sensitive activities) areas. The wording of NPSET policy 8 ("should seek to avoid") does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET). As a linear network, the National Grid has functional, operational and/or locational needs to be located in particular areas where adverse effects are unavoidable, and it may not be possible to substantially protect the values of the area. These constraints, together with the benefits the infrastructure provides to the district and beyond (i.e. potentially rendering them not 'inappropriate'), need to be acknowledged and provided for. Transpower supports the recognition of the functional and operational needs of network utilities (as required by Policy 3 of the NPSET) that is provided in clause 'a' within the context of "reasonably practicable".</p>	<p>Retain Policy 3.3 on the basis of the provision of a National Grid specific policy (Policy 3.6) consistent with the relief sought by Transpower.</p>
S12/33	Transpower	Policy 3.4	Support	<p>Transpower supports Policy 3.4 as it recognises and provides for the operation, maintenance, replacement or minor upgrading of existing network utilities located within or adjacent to Outstanding Natural Features and Landscapes. The ongoing maintenance and replacement of such infrastructure (including the National Grid) is important for the wellbeing of the community. While the policy is not specific to the National Grid, it gives effect to Policies 2 and 5 of the NPSET.</p>	<p>Retain Policy 3.4 as notified.</p>

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/34	Transpower	Policy 3.5	Neutral	Transpower generally supports Policy 3.5 on the basis of the separate provision of a National Grid specific policy (i.e. Policy 3.6) that seeks to give effect to the NPSET. Transpower also supports the reference to <i>"inappropriate use and development"</i> within the policy and notes that this provides consistency with the proposed objectives in the new Natural Features and Landscapes chapter, particularly NFL-O2.	Retain Policy 3.5 on the basis of the provision of a National Grid specific policy (Policy 3.6) consistent with the relief sought by Transpower.
S12/35	Transpower	Policy 3.6	Support	(Support with amendment) Transpower generally supports Policy 3.6 as it seeks to give effect to the NPSET by providing a National Grid specific policy for the major upgrade or development of new National Grid Electricity infrastructure within an Outstanding Natural Feature or Landscape. However, Transpower seeks some amendments to refine Policy 3.6 to ensure it give effect to the NPSET. In particular, Transpower seeks to include specific reference to recognising the benefits of the National Grid (to give effect to Policy 1 and 2 of the NPSET) by providing for the major upgrade and development of new National Grid infrastructure. In addition, Transpower seeks to include reference to "where practicable" at the end of clause 'd' in order to make it clear that the requirement for avoidance or remediation is not absolute and may not be practicable for the National Grid. It is noted the NPSET does not require all effects be avoided, remedied or mitigated, rather the term is only used in NPSET Policy 3 in context of considering constraints when considering measures to avoid, remedy or mitigate adverse environmental effects, and Policy 4 in context of the extent to which any adverse effect have been avoided, remedy or mitigated by the routes, site and method selection. While Transpower notes that the term "where practicable" is used within the upfront section of Policy 3.6, it is not clear this directly relates to clause 'd'.	Amend Policy 3.6 as follows: "To recognise <u>the benefits of the National Grid by providing for</u> the major upgrade or development of new National Grid Electricity infrastructure in an Outstanding Natural Feature or Landscape by managing adverse effects on the characteristics and values of the feature or landscape by ensuring route, site and method selection demonstrates that, to the extent practicable having regard to the functional, operational and technical needs of the National Grid, in order of preference: (a) Infrastructure will be located outside of an Outstanding Natural Feature or Landscape. (b) Where a. cannot be achieved, infrastructure will be located in the more compromised parts of the Outstanding Natural Feature or Landscape; and (c) Techniques (such as structure selection) will be used to avoid adverse effects; and (d) Adverse effects that cannot be avoided will be remedied or mitigated, <u>where practicable.</u> "

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S12/36	Transpower	Rule 3A.4.5 Discretionary activity	Support	Transpower supports the discretionary activity status that is provided for new transmission electricity lines within any ONF identified in NFL-APP1 or a SAF identified in NFL-APP2 within Rule 3A.4.5.a. As a discretionary activity, a full assessment of effects would be required, as well as a robust route, site and method selection process (as required by Policy 4 of the NPSET), appropriate conditions imposed, and the application able to be granted or declined.	Retain the discretionary activity status for new transmission electricity lines within a ONF or SAF in Rule 3A.4.5.
S12/37	Transpower	Rule 3A.4.6 Non Complying activity	Oppose	Transpower opposes the non-complying activity status for the National Grid within Outstanding Natural Landscapes (ONLs) under Rule 3A.4.6 as this does not give effect to the NPSET. Transpower seeks a discretionary activity status for new National Grid activities located within ONLs, consistent with the discretionary activity status provided by PC65 for new National Grid activities located within ONFs (and SAFs). The PC65 is required to give effect to the NPSET. Policy 8 of the NPSET directs that, within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain identified environments (being outstanding natural landscapes, area of high natural character and recreation values and amenity and existing sensitive activities). The wording of NPSET Policy 8 ("should seek to avoid") does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET). On this basis, given the locational, operational and technical constraints of the National Grid, the recognition of the provision of infrastructure and operational need, and the national significance of the National Grid (as provided for in the NPSET), Transpower supports a discretionary activity status for new structures associated with the National Grid within Outstanding Natural Landscapes. As a discretionary activity, a full assessment of effects would be required, as well as a robust route, site and method selection process (as required by NPSET Policy 4), appropriate conditions imposed, and the application would be able to be granted or	Amend Rule 3A.4.6 to provide for new National Grid infrastructure within an identified Outstanding Natural Landscape as a discretionary activity.



No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
				declined. A discretionary activity status would also give effect to the new National Grid specific policy (Policy 3.6), with the 'seek to avoid' policy directive imbedded within the policy. A discretionary activity status for new National Grid development within both Outstanding Natural Landscapes and Features will ensure careful consideration is given to any proposed development against the specific characteristics and values of the landscape or feature. A discretionary activity status for new National Grid development within Outstanding Natural Landscapes has recently been adopted in the Whangarei District and Thames Coromandel District proposed district plans (as agreed through consent orders) with appeal parties agreeing to the discretionary activity status on the basis of the 'seek to avoid' policy.	
S12/38	Transpower	Rule 3D.4.4 discretionary activity	Support	Transpower supports the discretionary activity status that is provided for any earthworks within an ONF identified in NFL-APP1 or SAF identified in NFL-APP2 within Rule 3D.4.4.b. As a discretionary activity, a full assessment of effects would be required, appropriate conditions imposed, and the application would be able to be granted or declined.	Retain the discretionary activity status in Rule 3A.4.4 for earthworks activities within a ONF or SAF.
S12/39	Transpower	Rule 3D.4.5 non-complying activity	Oppose	Transpower opposes the non-complying activity status for earthworks activities (specifically those associated with the use and development of the National Grid) within ONLs under Rule 3A.4.5. as this does not give effect to the NPSET. Transpower seeks a discretionary activity status at most for earthworks activities associated with the National Grid that are located within ONLs, consistent with the discretionary activity status provided by PC65 for new National Grid activities in ONFs (and SAFs). Specific to the National Grid, earthworks are required to provide access to, and enable the ongoing operation, maintenance, repair and removal of infrastructure. The PC65 is required to give effect to the NPSET. Policy 8 of the NPSET directs that, within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain identified environments (being outstanding natural landscapes, area of high natural character and recreation values and amenity and existing sensitive activities).	Amend Rule 3D.4.5 to provide for earthworks associated with the National Grid within an Outstanding Natural Landscape as a discretionary activity.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
				<p>The wording of NPSET Policy 8 ("should seek to avoid") does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET). A non-complying activity status does not give effect to the NPSET specifically Policies 1, 2, and 8. On this basis, given the locational, operational and technical constraints of the National Grid, the recognition of the provision of infrastructure and functional need, and the national significance of the National Grid (as provided for in the NPSET), Transpower supports a discretionary activity status for new structures associated with National Grid within Outstanding Natural Landscapes. As a discretionary activity, a full assessment of effects would be required as well as a robust route, site and method selection process (as required by NPSET Policy 4), appropriate conditions imposed, and the application would be able to granted or declined. A discretionary activity status would also give effect to the new National Grid specific policy (Policy 3.6), with the 'seek to avoid' policy directive imbedded within the policy. Policy 1.3 seeks to restrict earthworks in ONFLs and does not support non-complying status for earthworks in an ONFL.</p>	
S13/1	Horizons Regional Council	Planning Maps	Support	<p>The One Plan Regional Policy Statement sets the policy framework for management of ONFL in the region. Specifically, these matters are addressed in Objective 6-2, and Policies 6-6 and 6-7. Horizons therefore supports the mapping of the district's ONFL, as this gives effect to part of Policy 6-6. HRC acknowledge Mr. Hudson's categorisation (on p. 15) that the criteria he has used correlate to those set out in Table 6.1 of Policy 6-7, and that view that this is consistent with the requirements for the identification of ONFL, their characteristics and spatial extent, as set out in the One Plan.</p>	Overall support but do not unreservedly support all rules. Refer other submissions.
S13/2	Horizons Regional Council	NFL-O1	Support	<p>With regard to the proposed district plan provisions, Horizons supports NFL-O1 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.</p>	Support.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S13/3	Horizons Regional Council	NFL-O2	Support	With regard to the proposed district plan provisions, Horizons supports NFL-O2 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	Support.
S13/4	Horizons Regional Council	NFL-O3	Support	With regard to the proposed district plan provisions, Horizons supports NFL-O3 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	Support.
S13/5	Horizons Regional Council	Objective 3	Support	With regard to the proposed district plan provisions, Horizons supports Chapter 3A Objective 3 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	Support.
S13/6	Horizons Regional Council	NFL-P1	Support	With regard to the proposed district plan provisions, Horizons supports NFL-P1 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	Support.
S13/7	Horizons Regional Council	NFL-P6	Support	With regard to the proposed district plan provisions, Horizons supports NFL-P6 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	The submitters believe that the proposed rules will enable MDC to implement the effects management hierarchy set in One Plan Policy 6-6(a) and (b) and reflected in Policies NFI-P6, NFL-P7, and 3A 3.2 and 3.3. However, they do not unreservedly support all of the rules proposed in the plan change.
S13/8	Horizons Regional Council	NFL-P7	Support	With regard to the proposed district plan provisions, Horizons supports NFL-P7 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	The submitters believe that the proposed rules will enable MDC to implement the effects management hierarchy set in One Plan Policy 6-6(a) and (b) and reflected in Policies NFI-P6, NFL-P7, and 3A 3.2 and 3.3. However, they do not unreservedly support all of the rules proposed in the plan change.
S13/9	Horizons Regional Council	Policy 3.2	Support	With regard to the proposed district plan provisions, Horizons supports Chapter 3A Policy 3.2 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	The submitters believe that the proposed rules will enable MDC to implement the effects management hierarchy set in One Plan Policy 6-6(a) and (b) and reflected in Policies NFI-P6, NFL-P7, and 3A 3.2 and 3.3. However, we do not unreservedly support all of the rules proposed in the plan change.
S13/10	Horizons Regional Council	Policy 3.3	Support	With regard to the proposed district plan provisions, Horizons supports Chapter 3A Policy 3.3 as it gives effect to the other aspects of One Plan Objective 6-2 and Policies 6-6 and 6-7.	The submitters believe that the proposed rules will enable MDC to implement the effects management hierarchy set in One Plan Policy 6-6(a) and (b) and reflected in Policies NFI-P6, NFL-P7, and 3A 3.2 and 3.3. However, they do not unreservedly support all of the rules proposed in the plan change.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S13/11	Horizons Regional Council	Policies – general comment	Support	<p>(Support with amendments) Horizons acknowledges that the intent (in relation to indigenous biodiversity) is to provide a framework for MDC to consider amenity and visual-related effects. Horizons considers this is an appropriate approach, which is consistent with the allocation of responsibilities for managing indigenous biodiversity habitats in the region set out in One Plan Policy 6-1.</p> <p>Horizons is concerned that the scope of the types of effects is not referred to within the policy or rule framework. For example, policies refer simply to restricting removal or protecting existing indigenous biodiversity. We would support amendments that ensure clarity and avoid duplication of regulation between the district and regional plan provisions.</p>	Seek that proposed provisions relating to indigenous biodiversity be amended to make more explicit the intent to consider effects relating to matters such as amenity and visual characteristics.
S13/12	Horizons Regional Council	NFL-P16	Support	<p>(Support with amendments) Horizons requests that Policy NFL-P16 be amended to explicitly convey that planting should use indigenous species appropriate to the ecological area. Not all indigenous species, or locally sourced indigenous species will be appropriate; for example, karaka is a readily available species that is considered a pest plant and would not be appropriate.</p>	Amend Policy NFL-P16 as follows: "To encourage restoration and planting with locally sourced indigenous species <u>appropriate to the ecological area within</u> of Outstanding Natural Features and Landscapes and Significant Amenity Features."
S13/13	Horizons Regional Council	NFL-R2	Support	<p>(Support with amendments) Horizons requests that Policy NFL-R2 be amended to explicitly convey that planting should use indigenous species appropriate to the ecological area. Not all indigenous species, or locally sourced indigenous species will be appropriate; for example, karaka is a readily available species that is considered a pest plant and would not be appropriate.</p>	Amend Rule NFL-R2 as follows: "Planting and restoration of indigenous vegetation within Outstanding Natural Features and Landscapes and Significant Amenity Features using indigenous species <u>appropriate to the ecological area.</u> "
S13/14	Horizons Regional Council	Chapter 3A – general comment	Support	<p>Horizons support the clear direction in the NFL chapter that activities involving ONFL are regulated by Chapter 3A Network Utilities. However, there should be greater clarity as to which provisions the repowering of a windfarm would be assessed against to ensure that it would not be considered a replacement under Rules 3A.4.2.a.</p>	Clarify that the repowering of windfarms would not be considered as a 'replacement' network utility under permitted activity Rule 3A.4.2.a.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S13/15	Horizons Regional Council	Permitted activities – general comment	Support	Horizons supports Guidance Note 2 below the NFL permitted activity rules. However, this should be expanded to refer to vegetation clearance and activities affecting indigenous biodiversity habitat, including indigenous vegetation, which Horizons also regulates. There is likely to be considerable overlap between ONFL and areas that meet the description of at-risk, rare, or threatened habitat under the One Plan, and are subject to strict regulation.	Seek that Guidance Note 2 for NFL permitted activities be expanded to refer to vegetation clearance and activities affecting indigenous biodiversity habitats, including indigenous vegetation.
S13/16	Horizons Regional Council	NFL-R1	Support	The proposed policy framework supports the protection and maintenance of values and characteristics of ONFL, indigenous vegetation, and the enabling of passive recreation, conservation and customary activities. These policies are particularly relevant to Horizons' management of Totara Reserve. Seeks clarification that Rule NFL-R1 enables Horizons to carry out maintenance to reinstate sections of tracks that have washed out, enabling repair and remarking of otherwise potentially dangerous areas to be completed without delay. We consider that this is consistent with Policy NFL-P8 which states "To enable passive recreation, conservation and customary activities within Outstanding Natural Features and Landscapes identified in NFL-APP1 where this does not adversely affect the characteristics and values of those areas"; noting that, for the Totara Reserve, public walking tracks are a feature of the Associational-Recreation characteristics. Further, the summary highlights that the area is "A natural feature that is easily accessible by the public appreciation of natural features. Maintenance of tracks and public facilities should be facilitated and not discouraged through the planning process" (NFL-APP1, p.42; emphasis added). It should be noted that this activity occurs on the flat river terrace area where, in our view, natural character values are not high.	Clarify that Horizons can carry out maintenance to reinstate sections of tracks as a permitted activity.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S13/17	Horizons Regional Council	NFL-R10	Unstated	Horizons acknowledges that the intent of Rule NFL-R10 is to be an enabling provision, recognising that management plans set out planned development. Horizons would prefer that the activity status be less restrictive, particularly in relation to formation of new tracks in Totara Reserve, which are strongly supported by the description of Associational-Recreation characteristic. This activity does not involve removing canopy vegetation. There would be limited land disturbance (a small digger may be used occasionally, at most) and vegetation disturbance of the understory, in an area up to 2 metres in width. This would occur under the canopy and would be unlikely to have a significant impact on the visual characteristics of the ONF.	Horizons notes the direction at the beginning of the Rules section of the Natural Features and Landscapes chapter that earthworks are provided for the Chapter 3D provisions. The submitter seeks clarification in Rule NFL-R10 that 'development' includes associated earthworks as an ancillary activity. Requests that the activity status for creating new tracks consistent with Reserve Act status or relevant management plan for the specific ONFL be a less restrictive activity status than restricted discretionary.
S13/18	Horizons Regional Council	Appendix 1 ONFL 10	Unstated	Horizons notes that on page 42 of the ONF 10- Totara Reserve in NFL-APP1, the Associational-Historical characteristic describes Camp Rangī Woods as being "in farmland at the northern end of the reserve." This is misleading; while the Reserve as a whole is surrounded by farmland, the campsite sits within the Reserve.	We request that this description be amended as follows: "... and is <del>in farmland</del> <u>located</u> at the northern end of the reserve." Requests the final sentence in the Natural Science - Biological/Ecological characteristic description, referring to weta hotels, be deleted as this is inaccurate.
S14/1	Melissa Wilde	Planning Maps	Unstated	To keep the land the way it is.	To keep the land the way it is.
S15/1	Nga Tamariki a Tane Society Inc	Appendix 1 ONFL 1	Support	Nga Tamariki a Tane Society Inc owns a 125ha block of native bush at the end of Limestone Road for conversation purposes with unrestricted public access. The submitter supports the concept of ONFL 1 (Ruahine Range) and is pleased to have the majority of their bush block included in it. The QEII National Trust has indicated Nga Tamariki a Tane Society Inc to establish a covenant on the site. As the submitter proposes to build a small hut on the site, the Trust has advised to exclude the subject site from the covenant. This subject site is located on the flat river terrace on the west side of Makiekie (Coal) Creek and is at the same level as the adjoining farm land; so it is not visible to anyone further away than the carpark at the end of Limestone Road, and no large trees would be felled if the hut was built. The current proposed boundary of ONFL 1 excludes most of the Makiekie Creek river terrace on the submitter's land, but cuts across the terrace just downstream of the site the submitter have identified for the possible future hut.	That the boundary of ONFL 1 where it crosses the Makiekie Creek river terrace be moved upstream and follow a line that is a southerly continuation of the submitter's boundary fence that runs approximately N-S (maps attached to submission).

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S16/1	Angela and Alexander McIntyre	NFL-O1	Unstated	The submitter questioned how Council evaluated the identified of ONDL under the RMA 32 process of involving the community and consultation of landowners -for example if you cannot access the Mangamako Gorge or see it from a boat/kayak how was this included?	No specific decision requested.
S16/2	Angela and Alexander McIntyre	NFL-O2	Unstated	Define inappropriate use and development. This is inoperant to NFL-i1 & i4.	The submitter would like to be part of the decision making of this definition.
S16/3	Angela and Alexander McIntyre	NFL-O2	Unstated	Word protect should be removed. [Note the submission referred to NFL-O3 however consider the submission point relates to O2]	Remove "protect" from the objective.
S16/4	Angela and Alexander McIntyre	NFL-O3	Unstated	Protecting family farms encourages farm succession, rather than being bought out by larger corporations. This will help protect characteristics as landowners need to be recognised for the ONFL current state of appeal. Compensation for owners is required in LOU of inhibiting subdivision development, along with a free consent process for applications regarding amenity features and subdivision of relevant land. [Note the submission referred to NFL-O4 however consider the submission point relates to O3]	Provide scientific data of the RMA under section 32 on the consultation of landowners and continuing the economic impact of the proposed rules and regulations will impact on their business. Remove the word 'protect' from objective.
S16/5	Angela and Alexander McIntyre	Objectives – general comment	Unstated	Only ecosystems are indigenous - please show science stat from RMA under section 32 where this back up. The Tasmanian Blackwood trees that were planted as part of the farm forestry were considered to be a significant stand in New Zealand. Most were flooded in 2004. The remaining trees enhance the area and provide income for the Manawatu District when harvested. [Note this submission referred to NFL-O5 which is not a proposed objective.]	Clarify how can you maintain and enhance a dynamic feature such as cliffs and farmland which has evolved due to erosion/advancing farming techniques?; and provide data of original plant species.
S16/6	Angela and Alexander McIntyre	Objectives – general comment	Unstated	Please show science data of how to maintain and enhance. [Note this submission referred to NFL-O6 which is not a proposed objective.]	Please show science data from RMA under s32 of how we can maintain and enhance.
S16/7	Angela and Alexander McIntyre	Objectives – general comment	Oppose	Network utilities - need to provide provisions/the ability for adjacent landowners/landowners to use gravitational potential energy (water included), which is an underutilised valuable economic resource. [Note this submission referred to NFL-O7 which is not a proposed objective.]	Please demonstrate evidence of having thought about the long term financial and environment implications involved in this trade off i.e. preventing future profitable environmentally sustainable energy to keep the cliff looking nice for people driving past at 100km per hour or playing golf.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S16/8	Angela and Alexander McIntyre	Policies – general comment	Unstated	How was the geological/geomorphological assessed? The Rangitikei cliffs are dynamic and erodes.	Define the process of formation.
S16/9	Angela and Alexander McIntyre	NFL-P2	Unstated	The submitter questioned the classification process and asked if consultation has been undertaken to identify the allocated areas. The Mangamako Gorge must be excluded as there is no viewpoint or access from the land/road or river. It is irrelevant to include the area as an ONFL. It can only be identified from an aircraft and no access to it allows it to remain its untouched natural state. The submitter stated that access will only have biosecurity implications and ruin the microclimate.	Please clarify what amenity features based/identified characteristics and values were made and who consulted the landowners? How was the ground access accomplished to identify Mangamako Gorge as an ONFL area?
S16/10	Angela and Alexander McIntyre	NFL-P2	Oppose	To identify the spatial extent of Significant Amenity Features. [Note this submission referred to NFL-P3 however consider this submission point relates to P2.]	Specify too open need to see reasoning and mapping. Define/specify what is meant by 'characteristics of the areas'.
S16/11	Angela and Alexander McIntyre	NFL-P6	Unstated	Define cumulative effects in glossary. Under RMA 32 what is the officers report provided for the effected community and how are they consulted. [Note this submission referred to NFL-P5 however consider the submission point relates to P6.]	Define cumulative effects in glossary. Under RMA 32 what is the officers report provided for the effected community and how are they consulted.
S16/12	Angela and Alexander McIntyre	NFL-P7	Oppose	Unclear of meaning A document of best proactive for all ONFL. Workshops for affected landowners/manages are needed. Followed adjacent landowners that affect ONFL areas who will have ongoing effects on the ONFL areas. [Note this submission referred to P6 however consider the submission point relates to P7.]	Provide a document or best practice for all ONFL. Workshops and follow-up on affected landowners/manages.
S16/13	Angela and Alexander McIntyre	NFL-P10	Oppose	Must allow landowners to improve/maintain network utilities from cables, pipes wind turbine, telecommunications to maintain and improve on or allow for future unseen technology without economic impact or inhibit growth. [Note this submission referred to NFL-P7 however consider the submission point relates to P10.]	Allow landowners to improve/maintain network utilities from cables, pipes, wind turbines, telecommunications.
S16/14	Angela and Alexander McIntyre	Policies – general comment	Oppose	Leave large scale earthworks to Horizons. [Note this submission referred to NFL-P8 however this policy was not notified.]	Leave large scale earthworks to Horizons.



No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S16/15	Angela and Alexander McIntyre	NFL-P8	Oppose	This poses serious health and safety. It is not acceptable for private property. It also poses biosecurity threat and is damaging not the landscape, plant and ecosystems, lowers business security and poses as a danger to humans as we have dangerous animals. [Note this submission referred to NFL-P9 however consider this submission point relates to P8.]	Not acceptable for private property.
S16/16	Angela and Alexander McIntyre	NFL-P4	Oppose	Opposed to this as a rule. A wide range of activities should be permitted. Should be controlled only through a free consent process. [Note submission referred to NFL-P10 however consider this submission point relates to P4.]	This should be controlled only through a free consent process.
S16/17	Angela and Alexander McIntyre	NFL-P5	Unstated	Exclude "where they do not adversely affect the characteristics and values of the feature identified in NFL-APP1". [Note this submission referred to NFL-P11 however consider this submission point relates to P5.]	NFL-P11 to read: "To recognise the existing farming activities within the Rangitikei River Outstanding Natural Feature includes existing farming activities and enable continuation of these activities."
S16/18	Angela and Alexander McIntyre	NFL-P6	Unstated	Define accumulative effects in glossary. [Note this submission referred to NFL-P12 however consider this point relates to P6.]	Define cumulative effects in glossary.
S16/19	Angela and Alexander McIntyre	NFL-P7	Unstated	Define meaning of 'adverse effects on the characteristics and values of Outstanding Natural Features. Would like to be involved in definition. Looks similar to NFL-P6 unclear of difference. [Note this submission referred to NFL-P14 however consider this point relates to P7.]	Define the meaning of "adverse effects on the characteristics and values of Outstanding Natural Features". The submitter would like to be involved with the process of forming the definition.
S16/20	Angela and Alexander McIntyre	Policies – general comment	Unstated	pattern of building. Please define best practices. Free consent process for landowners. [Note submission referred to NFL-P14 however this policy was not notified.]	Define best practices and provide free consent process for landowners.
S16/21	Angela and Alexander McIntyre	Policies – general comment	Unstated	Retain to build existing infrastructure, of erosion on existing tracks that need to be reinstated to the extent it is strictly Geotech sound. [Note submission referred to NFL-P15 however this policy was not notified.]	Provide free consent process which is rapid in cases of natural disasters, river control to prevent farmland or farm infrastructure from damage.
S16/22	Angela and Alexander McIntyre	NFL-P8	Oppose	This imposes on landowners' rights to privacy and the ability to run a business. It also poses threats to business security and health and safety issues. [Note submission referred to NFL-P16 however consider this point relates to P8.]	This imposes on landowners' rights to privacy and the ability to run a business. It also poses threats to business security and health and safety issues.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S16/23	Angela and Alexander McIntyre	NFL-P13	Oppose	This limits economic opportunities for farming families to achieve farm succession. It allows corporate entities to purchase family farms. [Note submission referred to NFL-P17 however consider this point relates to P13.]	Provide free consent process for affected landowners.
S16/24	Angela and Alexander McIntyre	NFL-P14	Oppose	This limits economic opportunities for farming families to achieve farm succession. It allows corporate entities to purchase family farms. [Note submission referred to NFL-P18 however consider this point relates to P14.]	Provide free consent process for affected landowners.
S16/25	Angela and Alexander McIntyre	NFL-P11	Oppose	Covered by One Plan already. [Note submission referred to NFL-P19 however consider this point relates to P11.]	Covered by One Plan already.
S16/26	Angela and Alexander McIntyre	NFL-P12	Oppose	This is already considered outstanding even with exotics, black wattles, Tasmanian blackwood's and poplars. We need to maintain balance outside of the regulatory framework in conjunction with the landowners. There are economic impacts and biosecurity threats if there is limited species. [Note submission referred to P20 however consider this point relates to P12.]	What impact and analysis have been done to understand the financial/environmental impact on landowners or local businesses?
S16/27	Angela and Alexander McIntyre	NFL-P15	Oppose	This will cause eco-scouring and local resilience is essential. An active farmer builds gene source for biology or economic resilience in plant stock to avoid genetic reticence in the bush for kauri dieback, myrtle rust etc. [Note this submission referred to NFL-P21 however consider it relates to P15.]	This will cause eco-scouring and local resilience is essential. An active farmer builds gene source for biology or economic resilience in plant stock to avoid genetic reticence in the bush for kauri dieback, myrtle rust etc.
S16/28	Angela and Alexander McIntyre	NFL-P17	Unstated	A free consent process will build a strong culture of compliance. This will keep weeds to a minimum. Good practice guidelines will encourage grazing during high flow times, minimising the environmental impacts. [Note submission referred to NFL-P22 however consider submission refers to P17.]	Should read: "To enable the continuation of existing stock grazing within Significant Amenity Features."
S16/29	Angela and Alexander McIntyre	NFL-P18	Unstated	Please define 'use and development' in glossary best practice guidelines. [Note submission referred to NFL-P23 however consider this point relates to P18.]	Define "use and development" in glossary of best practice guidelines.
S16/30	Angela and Alexander McIntyre	Policies – general comment	Unstated	Leave this for Horizons one plan there is not need for drainage to be in policy. [Note submission referred to NFL-P24 however this policy was not notified.]	Covered by Horizons Regional Council. There is no need for drainage in policy.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S16/31	Angela and Alexander McIntyre	Policy 3.4	Unstated	Should read to add future network utilities and landowner owned. [Note submission refers to NFL-P25 however consider this point relates to 3A P3.4.]	Should read: "To enable the operation, maintenance, replacement or minor upgrading of existing <u>or future</u> network utilities <u>and landowner owned</u> located within or adjacent to Outstanding Natural Features and Landscapes and Significant Amenity Features."
S16/32	Angela and Alexander McIntyre	NFL-P6	Unstated	Define in glossary. [Note submission refers to NFL-P26 however consider this point relates to P6.]	Define in glossary best practice guidelines.
S16/33	Angela and Alexander McIntyre	Policy 3.3	Oppose	This directly infringes on economy and opportunities on the farm. It limits resilience adaptability on nations individual farming families. [Note submission refers to NFL-P27 however consider this point relates to 3A P3.3.]	Please show the economic modelling projected financial impact; Where is this dealt with in the RMA 32- the data potential of future loss of opportunity; Limits CDEDA economic growth.
S16/34	Angela and Alexander McIntyre	Rules – general comment	Unstated	Under this policy, there is no non-regulatory approach to methods mentioned.	Setting up a committee consisting primarily of landowners ensures they have a say when producing 'best practice' document/set of guidelines. This would ensure a buy in and fair outcome for landowners.
S16/35	Angela and Alexander McIntyre	NFL-R1	Oppose	Strong dispute for public access as it makes more land available to the public. Also, in natural disasters and in large events, significant earthworks tend to be less likely.	Oppose public access.
S16/36	Angela and Alexander McIntyre	NFL-R7	Unstated	There should be no distinction between Totara Reserve Regional Park. All entities should be given the same set of rules. Owners and guardians of this area are being favoured. [Note submission refers to NFL-R8 however consider point relates to R7.]	All entities have the same rules.
S16/37	Angela and Alexander McIntyre	NFL-R9	Unstated	Covered by Horizons in One Plan already. [Note submission refers to NFL-R10 however considered point relates to R9.]	Leave this for horizons to control.
S16/38	Angela and Alexander McIntyre	NFL-R10	Unstated	The submitter suggests classifying restricted discretionary activities as controlled; and restricted discretionary as non-complying. [Note submission refers to R11 however consider point relates to R10.]	The submitter suggests classifying restricted discretionary activities as controlled; and restricted discretionary as non-complying.
S16/39	Angela and Alexander McIntyre	Rules – general comment	Unstated	Exclude impacts from business as usual; farm to forestry, forest to farm and forestry and farm forestry. [Note submission referred to MD4 which was not notified.]	Exclude impacts from business as usual; farm to forestry, forest to farm and forestry and farm forestry.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S16/41	Angela and Alexander McIntyre	NFL-R10	Unstated	There should be no distinction between Totara Reserve Regional Park. All entities should be given the same set of rules. [Note submission referred to NFL-R12 however consider point relates to R10.]	There should be no distinction between Totara Reserve Regional Park. All entities should be given the same set of rules.
S16/42	Angela and Alexander McIntyre	Rules – general comment	Oppose	The submitter opposes the whole of PC65, based on the grounds that the consultant Mr. John Hudson (Landscape Architect) was operating out of his expertise field. Would expect input from geomorphology and freshwater ecologist from experienced, well published ecologists. As landowners, have not been provided with the s32 evaluation report during the pre-consultation or consultation phases. This makes it hard for the submitter to examine the decision making process or the quality of evidence the council relied on. Given the potential social, cultural and economic impacts on the landowners where the ONFL and SAFs zoning falls, the submitter expected a robust field validation process would have taken place with every landowner. To submitter's knowledge, no one has accessed their property, or asked for permission to access their property for validation or generate intellectual property from their private property. Public meeting in Ohingaiti Pub in 2015 is insufficient consultation with landowners. The submission period is too short given drought and feeding stock. Request for time extension turned down.	The submitter opposed PC65 based on the fact that they see it as being detrimental to the private property right of the landowners where ONFL and SAFs are proposed. It is essential to protect private landowners rights and the rights to keep accessways, other existing structures allowing for new structures and if these are considered a consent must be obtained than it should be through a free consent process. Particularly with the Rangitikei River/Mangamako Gorge where water, power, telecommunications wires/pipes or the like need to be placed,
S16/43	Angela and Alexander McIntyre	Appendix 1 ONFL 4	Oppose	The Mangamako Gorge must be excluded as there is no viewpoint or access from the land, road or river. The only access is via walking through a private land. Therefore is irrelevant to be included in ONFL. Only identified from aircraft. No access allows it to remain in its untouched natural state. Access will only impact on biosecurity issues and ruin the microclimate. Questions reference to predictive modelling that appears to relate to the Rangitaiki River, not the Rangitikei River. Notes that under criteria Hydrological; Memorability- during the summer, the Mangamako Stream only flows intermittently. The submitter stated that this is incorrect as the Mangamako flows all year round, even during a pronounced drought.	Mangamako Gorge must be excluded. What amenity features based/identified characteristics and values were made and who consulted the landowners. How was the ground access accomplished to identify Mangamako Gorge as an ONFL area?

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S17/1	Barbara Hyde	NFL-R11	Unstated	(Totara Reserve and other similar location in Pohangina Valley) Oppose any subdivision of such areas. Activities such as replacing toilet blocks are acceptable, but new buildings are not necessary. By suggesting subdivision, it implies that the council would like to make it more business like. The submitter acknowledges the work MDC has done, but no further development should be undertaken. There are already facilities at Ranging Woods that are established. The submitter also stated that the shops in Ashhurst are in close proximity and no subdivision is necessary for any more new buildings. This area is a reserve and should be kept free and near to nature as possible.	The submitter trusts that MDC will maintain the environment as it is so it can remain untouched and available for all in the future. Allowing camping activities is sufficient.
S18/1	Bryan Rendle	Appendix 1 ONFL 3	Oppose	What basis was used to define lines as the area affected covers several hectares of productive farmland. The submitter does not support PC65. Lines on map need further refining.	Council needs to visit each affected property to view the area they are wanting to protect and adjust the lines accordingly. The submitter supports the initiative, but feels like the areas have been identified without visiting the farms.
S19/1	Phillipa Williams	Planning Maps	Oppose	Objects to the Tuha Stream being part of the ONF on 315, Peka Road. Must reach agreement with the Rangitikei District Council to follow same guideline on both side of river is consistent. Horizons stopped stock near river and now full of weeds. They should have listened to farmers.	It is unclear if sheep and beef farmer can crop within area. To not enforce any part of PC65 until Rangitikei DC reaches same proposal on other side of river. Exclude Tuha Stream from ONL. Clarify weed and pest control.
S20/1	Nick and Annaliese Berry	NFL-P12	Oppose	Oppose the discouragement of planting exotics as need the option on some areas of the farm to plant erosion prone land with either pines or poplars to stabilise the hillsides and protect the Pohangina River from sediment runoff.	Encourage native planting but do not restrict planting of exotics.
S20/2	Nick and Annaliese Berry	Rules – general comment	Oppose	It is unclear what the effects will be in terms of cultural values. Oppose anything that gives a right to roam over private property. Any access must be granted with their permission.	Clearer wording on how cultural values will affect access to private property. "No permission=No access"
S20/3	Nick and Annaliese Berry	Chapter 3D – general comment	Oppose	The submitter oppose the discouragement of earthworks. They are in the process of fencing off a large area of native bush and wetlands. More earthworks needed to clear areas for fencing, by which some of these areas will need ongoing maintenance to ensure wetlands do not deteriorate.	Allow earthworks to maintain farm tracks, wetlands and fences.
S20/4	Nick and Annaliese Berry	NFL-R12	Oppose	The submitter oppose restricting build development. Their farm requires new accommodation for staff and new sheds to house equipment. This would restrict their ability to employ staff.	Allow built development for farm buildings and staff houses.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S21/1	Aggregate and Quarry Association	NFL-R18	Unstated	<p>Quarrying and extraction activities are already covered by Horizons Region Council One Plan. Manawatu District Council could give guidance in areas such as scale and noise pollution, but nothing more is required. PC65 would overly restrict quarrying and extractives, making it harder for the district to access aggregate essential for infrastructure and construction. NFL-R18 means that quarrying or gravel extracting activity will be considered a non-complying activity. The extraction sector is referred to twice in Table 3 of the Section 32 Report (page 20) which sets out potential issues associated with areas identified as ONFLs and SAFs.</p> <p>We argue that not all quarrying activity has impacts or is a threat to the Ruahine Range and Rangitikei River ONFLs. Therefore, it is unwise to apply rules making it harder to quarry than it needs be. Any risks to both the Rangitikei River and the Ruahine Range are sufficiently managed by the regional council's extraction rules.</p> <p>In the case of the Rangitikei River, it should also be noted, the quarry sector plays an important role in improving river flows and enhancing stability by removing excess material from the riverbed.</p>	Provision in the plan should be made for quarrying so it is not captured by the rule that deems it as a non-complying activity.
S21/2	Aggregate and Quarry Association	Planning Maps	Unstated	<p>Proper criteria are needed to make sure the land that is mapped and protected truly has outstanding values. Not all land should be mapped, only land that meets strict criteria.</p> <p>The Ruahine Range Outstanding Natural Area, for example, is very large and it is unlikely that the whole area is needed to be protected in this way.</p>	Parts of the areas that have been designated Outstanding Natural Features and Landscapes may not fit this description.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S21/3	Aggregate and Quarry Association	Rules – general comment	Unstated	<p>The nature of mineral and aggregate deposits means that they are limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them. This means adverse effects from their extraction are often impossible to avoid. Support a mitigation hierarchy approach, as used in the area of biodiversity management, where companies are able to provide compensation or offsetting to mitigate adverse effects that by definition cannot be avoided. It is important that the nature and location of mineral deposits of value to the district, are where possible, identified. Access to such deposits must not be inadvertently shut off through land development and council planning.</p> <p>Determining a reasonable distance for residential areas from potential quarry areas, is essential due to the significant expense of transporting quarry materials as well as the nature of extractive industry operations - including noise, vibration and dust. AQA is working with central government to increase knowledge of the location of mineral resources in New Zealand and we are able to assist councils to ascertain where such areas lie in their districts.</p>	<p>Given the exact location of mineral deposits is not usually known, a regime which provides for exploration is important, while noting that any development proposal that might arise from that exploration is subject to a rigorous resource consent process under the RMA.</p>
S22/1	New Zealand Defence Force	Permitted activities – general comment	Support	<p>(Support in part) NZDF requires the flexibility to undertake TMTA on an as and when required basis, utilising various situations and locations, including bush/forest and other landscape areas. Being able to stage training activities in varied locations is essential, as NZDF personnel may be deployed to a wide range of locations around New Zealand and the world. The types of TMTA undertaken within the areas subject to this Plan Change would generally be suited to the location, such as search and rescue training, and would generally not include significant vegetation removal/destruction. NZDF agrees that TMTA should also be subject to the relevant limits for earthworks and vegetation alteration or removal contained within PC 65 provision, and across other chapters of the Plan where relevant. Further detail is provided in the submission.</p>	<p>NZDF requests that TMTA are provided for as a permitted activity within the areas identified by this Plan Change, subject to the permitted activity noise standards provided by NZDF as Attachment 2.</p> <p>NZDF requests the following wording:  <u>Rule NFL-Rx: Temporary military training activities where the relevant noise standards below are met:</u>  <u>[refer Attachment 2 for rest of request]:</u></p>

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S23/1	Mark and Anna Clements	NFL-P12	Unstated	To not have the option of exotic plantings would detrimentally affect the submitter's ability to take advantage of changing environmental policies. This discriminates against using options provided for land use change in the One Billion Trees Programme and would be restrictive to their long term plans. Neighbouring properties have used extensive pine plantations as a very effective erosion control measure. These trees protect the upper Pohangina area (and all downstream) against slips, silt and runoff. The property value will also be impacted as the loss of a potential income source makes the property less desirable.	Further incentivise and promote native plantings. The submitter would also expect compensation from Council for farmers and landowners who have had this income opportunity removed.
S23/2	Mark and Anna Clements	Rules – general comment	Oppose	Clear wording of this clause is essential. Strongly oppose open access to and through their private property. Has granted limited access to the Ruahine Ranges via a poled route and have had issues with vandalism and theft as a consequence.	State in separate clause that open access is not granted for any reason on or through private property.
S23/3	Mark and Anna Clements	Chapter 3D – general comment	Oppose	Have excluded stock from water sources and thereby improved water quality downstream. This stock will now require an alternative water source, which may require extensive earthworks. Other earthworks are essential to improve infrastructure and farming operations.	Amendment to reflect farming operations and ongoing development, which protect and improve water quality in accordance with Clean Streams Accord. Also to maintain access in accordance with Health and Safety Guidelines.
S23/4	Mark and Anna Clements	NFL-R12	Oppose	The submitter has farming operations that requires further infrastructure, namely to accommodate staff, sheds and yards.	Amend built development clause to reflect ongoing development and farming operations.



No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S24/1	Steven and Julie O'Reilly	Rules – general comment	Oppose	Oppose the recommended provisions to the PPC65. The access and utilisation of the affected areas has impact on the way land is used. Do not want to lose ownership or management rights to land. Identified areas are under 'Whole Farm Plans' through Horizons Regional Council and incorporates 'Sustainable Land Use Initiative' guidelines. Question whether these plans still apply to land and who will cover cost of redrawing these? The land acts as a natural buffer and filter to help mitigate sediment and leachate issues, which helps to adapt to political and environmental pressures. PC65 removes any right as legal landowners to offset current and future legislative bills, as they no longer have the flexibility to respond. Current grazing stock also helps to reduce and mitigate any unforeseen and adverse events during feed pinches and control weed species, pasture and stock pest habits.	<p>Want to retain full legal ownership and management rights as they currently stand.</p> <p>Recommend that the proposed landscape assessed area remains under the current and future landowner stewardship and remains managed in consultation with the local body authorities as is the current practice. (in line with current environmental and political constraints)</p> <p>Retain continuation of existing stock grazing within the Makiekie and Limestone creek.</p> <p>Retain our access to water.</p> <p>Retain our access rights.</p> <p>Want to be left to the 'quiet enjoyment' of our own land.</p> <p>Have the following questions:</p> <ol style="list-style-type: none"> <li>1. What is the legal expression of interest that would be entered on the Deed of Title?</li> <li>2. What are going to be the future stipulation on land use outside of the 'Red Line', additionally what is the width of the Red Line?</li> <li>3. With the use of the term 'discretion' as stated in the plan, on who's authority is this?</li> <li>4. Who will pay for the changes required under the SLUi / Whole Farm Plans?</li> </ol>
S25/1	Stephanie Holloway	Appendix 1 ONFL 12	Oppose	Want to protect Gorton's Bush/Nitschke's Bush. Want to work with Council to do this but do not wish to be punished financially for owning it. Have already excluded stock, fenced and have plans to extends its edges by relocating seedlings within the forest. Oppose regulations being put in place. They have plans to build huts in the bush and put in unobstructive mountain bike/walking tracks as a form of diversifying their income. They want to see an increase in the demand and value of their farm, not decline because of the red tape.	This should be a partnership between landowner and council not a stick waving exercise. The decision should be to implement a special environmental plan that both parties work together on and share costs, add incentives and can be tailored to each individual site and situation.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S26/1	KiwiRail	Introduction	Support	KiwiRail support the note provided in the Introduction in relation to ensuring that these provisions are read alongside Chapter 3A in relation to Network Utilities, and that clarity is provided that the more specific provisions of Chapter 3A apply.	Retain as proposed.
S26/2	KiwiRail	NFL-O1	Support	KiwiRail supports this objective as having areas identified and mapped will help with the planning of future works in the event these extent beyond the designation boundaries	Retain as proposed.
S26/3	KiwiRail	NFL-O2	Support	(Support in part) KiwiRail support the intention of the Objectives in relation to the characteristics and values of the ONF and ONL, however note that there is a potential conflict with the intention to protect these in O2 and maintain or enhance these in O4. We recognise that O2 relates only to those ONF and ONL provided in APP1, however O4 appears to apply to all ONF and ONL areas, including those in APP1. Clarification would be supported to ensure in the event these provisions are relied on through the consent process, clarity is provided.	Amend to provide clarity.
S26/4	KiwiRail	NFL-O4	Support	(Support in part) KiwiRail support the intention of the Objectives in relation to the characteristics and values of the ONF and ONL, however note that there is a potential conflict with the intention to protect these in O2 and maintain or enhance these in O4. We recognise that O2 relates only to those ONF and ONL provided in APP1, however O4 appears to apply to all ONF and ONL areas, including those in APP1. Clarification would be supported to ensure in the event these provisions are relied on through the consent process, clarity is provided.	Amend to provide clarity.
S26/5	KiwiRail	NFL-R5	Support	KiwiRail support the provision for vegetation clearance that endangers network utilities as a permitted activity.	Retain as proposed.
S26/6	KiwiRail	NFL-R6	Support	The ability to maintain existing lawfully established structures is supported.	Retain as proposed.
S26/7	KiwiRail	Policy 1.5	Unstated	KiwiRail support recognition for network utilities in Significant Amenity Features as identified in NFL-APP2, however also seek that consistent recognition is given in the policy framework in relation to network utilities in the Outstanding Natural Features and Outstanding Natural Landscapes as identified in NFL-APP1.	Amend policy as follows: "To ensure network utilities are constructed and located in a manner sensitive to the amenity and landscape values where they are located, including those areas identified as <u>Outstanding Natural Features and Outstanding Natural Landscapes in NFL-APP1</u> and Significant Amenity Features in NFL-APP2."

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S26/8	KiwiRail	Objective 3 – general comments	Unstated	KiwiRail supports the intent of the objective, however has a concern that existing uses, and any associated maintenance or improvements to these, may not align with the characteristics and values of the ONF and ONL that are to be protected. Protection is considered a high threshold to be addressed, and may not allow rail associated works necessary for the safe operation of the network, to be undertaken. Further to that, the appropriateness or otherwise of works proposed is often a subjective assessment and provides no certainty for KiwiRail that works would be facilitated by this Objective.	Amend as follows: "The characteristics and values of the Outstanding Natural Features and Landscapes identified in NFL-APP1 and historic heritage are protected from the inappropriate use and <u>the</u> development of network utilities <u>is facilitated.</u> "
S26/9	KiwiRail	Policy 3.1	Unstated	KiwiRail supports the intent of the objective, however has a concern that existing uses, and any associated maintenance or improvements to these, may not align with the characteristics and values of the ONF and ONL that are to be protected. Protection is considered a high threshold to be addressed, and may not allow rail associated works necessary for the safe operation of the network, to be undertaken. Further to that, the appropriateness or otherwise of works proposed is often a subjective assessment and provides no certainty for KiwiRail that works would be facilitated by this Objective.	Amend as follows: "The characteristics and values of the Outstanding Natural Features and Landscapes identified in NFL-APP1 and historic heritage are protected from the inappropriate use and <u>the</u> development of network utilities <u>is facilitated.</u> "
S26/10	KiwiRail	Policy 3.2	Unstated	KiwiRail is concerned with the adoption of an 'avoid' policy, and the unreasonably high threshold this may establish, which in turn may prevent KiwiRail from carrying out the works necessary to maintain a safe and efficient rail network. In the event of consent being required, the use of 'avoid' does not enable the management of significant adverse cumulative effects. KiwiRail would support clarity for a consenting pathway where works are required that may need resource consent.	Amend as follows: "To avoid, <u>remedy, mitigate or offset</u> significant adverse cumulative effects from new network utilities on the characteristics and values of Outstanding Natural Features and Landscapes."
S26/11	KiwiRail	Policy 3.3	Support	KiwiRail support the policy, specifically that it enables effects to be remedied or mitigated, and provides recognition for infrastructure of national or regional importance.	Retain as proposed.
S26/12	KiwiRail	Policy 3.4	Support	The specific policy direction to enable the operation, maintenance, replacements or minor upgrading of existing network utilities is supported.	Retain as proposed.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S26/13	KiwiRail	Rule 3A.4.3.j	Unstated	The permitted standard as proposed restricts works to the road corridor. Noting that ONF-13 includes the rail corridor, KiwiRail would support the explicit recognition of the rail corridor in the permitted standards to ensure clear direction that works within this corridor are permitted even where identified in the ONF provisions.	Amend Rule 3A.4.3.j as follows: "Works that are undertaken outside of an existing road corridor carriageway or railway corridor, or that are not operation, maintenance, replacement or minor upgrading works must not be located within the areas scheduled in Appendix 1A (Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding Reserves), 1D (Trees with Heritage Value), 1E (Buildings and Objects with Heritage Value), 1F (Sites with Heritage Value), Outstanding Natural Features and Landscapes identified in NFL-APP1 or Significant Amenity Features identified in NFL-APP2 of this Plan."
S26/14	KiwiRail	Appendix 1 ONFL 13	Unstated	Similar to the earlier feedback provided, KiwiRail seek that the existing operational rail corridor designation be removed from the ONF mapping. It is a mapped and defined corridor and able therefore to be explicitly excluded from the area covered by the ONF. The rail corridor has been in place for a long time and is well recognised in the community.	Amend the map for ONF-13 to remove rail designation.
S27/1	Federated Farmers	Appendix 1 – general comments	Unstated	The District Plan needs to recognise and acknowledge that landowners and farmers are the reason that many areas of significant indigenous vegetation currently exist. Voluntary actions to protect and enhance areas of bush should be recognised, as often farmers have used their own resources and time to provide this public good. Actions such as fencing, pest and weed control, and permanently protecting sites via QEII covenants should be recognised, enabled and encouraged. Federated Farmers therefore submits that a new policy be added to this effect. The provision of incentives and assistance can be a great way of recognising voluntary efforts and encouraging further actions. Incentives such as transferable development rights, and assistance with fencing, pest control or rates relief should be considered and enabled by Council.	Voluntary actions that maintain or enhance landscapes and features as set out in NFL-APP1, are recognised and encouraged.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S27/2	Federated Farmers	Rules – general comment	Unstated	<p>Do not support the inclusion of Significant Amenity Features. While the RMA provides specifically under Sections 6 (b) and 6 (c), for Outstanding Natural Features and Landscapes, and Ecological sites, Significant Amenity Features are not. Section 7 of the Resource Management Act sets out "other matters" which includes (c) The maintenance and enhancement of amenity values. However, the statutory hierarchy of the Act requires Section 6, matters of national importance, to be given a "stronger direction" compared to those matters captured by section 7. The RMA does not require every activity or proposed activity to maintain and enhance amenity values. Section 7(c) obligations can be achieved through normal zoning. Any landscapes that do not meet the criteria to be identified as ONFLs do not need the level of protection afforded by Section 6. The creation of a "second tier" of significant amenity features or significant amenity landscapes, will result in unnecessary restrictions on activities in order to protect amenity and character values, over and above what the RMA requires, and will harm economic, social and cultural wellbeing. Federated Farmers encourages Council to remove 'significant amenity landscapes' from the proposed Plan, having confidence that the zoning provisions will ensure amenity values of working rural landscapes are retained. For the three significant amenity features mapped, evidence of retired land can be seen in all maps, demonstrating the actions the landowner/farmer is privately undertaking. The regulatory inclusion of these features in the plan, therefore adds little value in ensuring that the amenity of these features will be maintained and enhanced, and merely creates an unnecessary extra onerous regulatory burden.</p>	Seeks the deletion of all reference to SAFs in the Plan.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S27/3	Federated Farmers	NFL-P5	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape. We note that NFL-P5 provides for the continuation of existing farming activities. Federated Farmers support the intent of this policy, however considers existing farming activities should be permitted across all ONFLs. We therefore seek the Policy to be amended accordingly.	Amend NFL-P5 as follows: "To recognise <u>the existing primary production land use activities in Outstanding Natural Features and Landscapes the Rangitikei River Outstanding Natural Feature</u> includes existing farming activities and provide for the continuation of these existing activities where they do not adversely affect the characteristics and values identified in NFL-APP1."
S27/4	Federated Farmers	NFL-P9	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.
S27/5	Federated Farmers	NFL-P10	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.
S27/6	Federated Farmers	NFL-P11	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S27/7	Federated Farmers	NFL-P12	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.
S27/8	Federated Farmers	NFL-P13	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.
S27/9	Federated Farmers	NFL-P14	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.
S27/10	Federated Farmers	NFL-P16	Unstated	The sustainable management of primary production activities is the Manawatu District is necessary in order to enable this District to not just 'get by,' but also to prosper. Productive land use shapes the land, contributing to the amenity as recognised by Council and therefore should not be restricted. Fencing, tracks, shelter belts, cultivation, grazed pasture, cropping and buildings are evident when considering a primary production landscape.	Amend the policy to provide for existing activities ancillary to primary production similar to request under submission S27/3.
S27/11	Federated Farmers	Permitted activities – general comment	Unstated	Consistent with other previous submission points, seeks the inclusion of a permitted activity rule to provide for activities ancillary to primary production.	Inclusion of permitted activity rule: <u>NFL- RX Activities ancillary to primary production.</u>

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S27/12	Federated Farmers	Non-Complying activity – general comment	Unstated	Opposes the default non-complying status of activities that are not assigned a status elsewhere. This is inconsistent with the RMA, and also overly onerous compared to other district plans. Under Section 9 of the RMA, the use of land is presumed to be permitted unless it is restricted by a rule in a plan. We appreciate that not every eventuality can be covered with the use of activity lists, which is why we recommend that Council use the identified resource management issues as the guide to which the land should be managed. Non-complying status is very onerous, as it assumes that only the adverse effects of the activity could be significant, and that the activity is generally not compatible with zoning. There are also extra tests in Section 104D that non-complying activities have to satisfy.	That the default non-complying status of activities as proposed in the Plan is deleted.
S28/1	Waka Kotahi NZTA	NFL-O1	Support	The Transport Agency is supportive of this objective as it is helpful to have such areas identified and mapped for when we are planning future roading or any works outside of our designations.	Retain as notified.
S28/2	Waka Kotahi NZTA	NFL-O2	Support	(Support in part) The Transport Agency supports the intent of Objectives O2 and O4. However, they may be conflicting given O2 seeks to 'protect', which sets a very high threshold, and O4 seeks to 'maintain or enhance'. Nonetheless, it is our understanding (confirmed by MDC Policy Planner) that as there are no Network Utility specific provisions in the new NFL chapter, the specific provisions in amended Chapters 3A and 3D apply to roading activities. This is explained on page 1 of the Introduction to the new NFL chapter.	Retain the explanatory note on page 1 Introduction as notified
S28/3	Waka Kotahi NZTA	NFL-O4	Support	(Support in part) The Transport Agency supports the intent of Objectives O2 and O4. However, it considers they may be conflicting given O2 seeks to 'protect', which sets a very high threshold, and O4 seeks to 'maintain or enhance'. Nonetheless, it is our understanding (confirmed by MDC Policy Planner) that as there are no Network Utility specific provisions in the new NFL chapter, the specific provisions in amended Chapters 3A and 3D apply to roading activities. This is explained on page 1 of the Introduction to the new NFL chapter.	Retain the explanatory note on page 1 Introduction as notified



No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S28/4	Waka Kotahi NZTA	Policies – general comment	Support	<p>(Support in part) The Transport Agency understands that there are no Network Utility specific provisions in the new NFL chapter. As such, the specific provisions in amended Chapters 3A and 3D apply to any Network Utility activities, including roads. The Transport Agency considers that the wording explaining this on Page 1 within the Introduction section is adequate for plan users to determine which provisions are relevant when applying for, or processing applications, for Network Utilities.</p> <p>Nonetheless, the Transport Agency also seeks to ensure that the policies, read together with Chapters 3A and 3D, are appropriately enabling of the state highway network. The specific amendments to policies required may depend on whether the primary relief sought by this submission (of omitting current/impending state highway designations from the mapped ONFs) is granted.</p>	Retain explanatory note on Page 1 Introduction as notified; potentially amend policies to reflect the importance of enabling state highway operations (specific wording may depend on whether primary relief is granted).
S28/5	Waka Kotahi NZTA	Policy 1.5	Support	<p>(Support with amendment) The NoR and resource consent process must consider the amenity and landscape values of an area. This provision has only been updated to include SAFs. Clarification is sought to understand if this policy also applies to ONFLs (it appears from the s32 report that it does not).</p>	Clarification is sought as to whether this policy also applies to ONFLs.
S28/6	Waka Kotahi NZTA	Objective 3	Support	<p>(Support with amendment) The Transport Agency supports the intent of this objective. It does, however, have concerns about how it can be achieved given its qualitative nature and the extent to which it is in conflict with Objective 1. The high threshold of the ‘protection’ provision may be difficult for linear infrastructure to achieve its economic, environmental and social outcomes as required by the LTA and One Plan Policy 3-1. ‘Protection’ of characteristics and values is also dependent on how the provision of “inappropriate” use and development is assessed by plan users and decision makers and is subject to a fair amount of interpretation uncertainty for applicants.</p>	Adopt amended quantitative provisions: <p>"The characteristics and values of ONFL's... from the <del>inappropriate</del> use and development of network utilities <u>are managed through an effects-based hierarchy.</u>"</p>

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S28/7	Waka Kotahi NZTA	Policy 3.1	Support	(Support with amendment) The Transport Agency supports the intent of this policy. We do however, have concerns about how it can be achieved given its qualitative nature. The high threshold of the 'protection' provision may not allow our projects to achieve the economic, environmental and social outcomes required by the LTA.	Adopt amended provision: "To <del>protect</del> <u>recognise and provide for the characteristics and values...</u> "
S28/8	Waka Kotahi NZTA	Policy 3.2	Support	(Support with amendment) The Transport Agency does not support the use of the term 'avoid' in this policy. This term sets an unreasonably high, perhaps unachievable threshold, that may prevent the Transport Agency from carrying out its statutory obligations. The term 'avoid' does not provide for the management of significant adverse cumulative effects. The Transport Agency needs a clear decision-making pathway for its projects, which this provision as notified does not provide. Whilst the Transport Agency will seek to avoid such adverse effects where practicable, the complexities of infrastructure projects (their functional and operational needs and their national and regional importance) may not always allow for 'avoidance'. Furthermore, it is not clear how 'cumulative' effects will be assessed for linear infrastructure.	Clarify how cumulative effects will be assessed for linear infrastructure.  Adopt the cascading provisions of policy 3.3 within Chapter 3A or amend the provisions: "To <del>avoid</del> <u>remedy or mitigate</u> significant adverse cumulative effects from new network utilities on the characteristics and values of Outstanding Natural Features and Landscapes."
S28/9	Waka Kotahi NZTA	Policy 3.3	Support	(Potentially support with clarification) The Transport Agency supports the effects-based hierarchy approach of this policy, specifically that it acknowledges and provides for the complexity and importance of network utilities. There does not appear to be an explanation of footnote '2' and as such, we cannot definitively comment on this provision.	Clarification of footnote 2 in bullet point 'a'.
S28/10	Waka Kotahi NZTA	Policy 3.4	Support	The Transport Agency supports this provision in its entirety, specifically that it acknowledges the lifecycle of a network utility.	Retain provisions as notified.
S28/11	Waka Kotahi NZTA	Rule 3A.4.3.j	Support	(Support with amendment) The Transport Agency generally supports this Permitted Activity Standard. It considers however, that it needs to include the specific ability for 'emergency works' to be undertaken as per section 330 and 330B of the Resource Management Act 1991.	Amend this provision: "Works that are undertaken outside of an existing road corridor carriageway ( <u>excluding emergency works</u> )..."

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S28/12	Waka Kotahi NZTA	Policy 1.3	Support	(Support with amendment) The Transport Agency supports the intent of this policy however, as all our projects require earthworks we seek clarification as to what 'restrict earthworks' means and how this provision will be quantified and assessed by plan users and decision makers.	Clarification of the provision 'restrict' as it relates to earthworks; how this provision will be quantified and assessed by plan users and decision makers.
S28/13	Waka Kotahi NZTA	Appendix 1 ONFL 3	Oppose	<p>It is not entirely clear from the ONF-3 map if the state highway is included in this ONF. Council's Policy Planner has advised that a portion of SH54 intersects the Rangitikei River area at Vinegar Hill.</p> <p>Whilst we support the identification and protection of these areas, SH54 is already designated and is an existing road. We consider that the designation framework will achieve the same outcome as proposed by these provisions and therefore, it is unnecessary to include this road within this ONF. Furthermore, including the designation can create confusion for future decision makers when assessing outline plans for example, due to interpretation differences and/or confusion over which provisions apply.</p>	Exclude SH54 from ONF-3.
S28/14	Waka Kotahi NZTA	Appendix 1 ONFL 13	Oppose	<p>The Transport Agency considers that this ONF should exclude the new highway designation. It should be excluded because the new highway will introduce substantial works and built form into the environment, and this has clearly been signalled since before PC65 was notified. Conversely, it is not necessary for the new highway designation to be included within the ONF, because the provisions of the designation have been agreed and will appropriately mitigate effects on the landscape and receiving environment more broadly. This will be achieved through the numerous designation conditions (the ecological, earthworks, planting and landscape management plans in particular).</p> <p>If the designation area is included within the ONF, there would be a potential for future decision makers to interpret differently the PC65 provisions and how these do or do not apply to the new state highway, including outline plans and outline plan waivers.</p>	Exclude the new state highway designation from ONF-13.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S28/15	Waka Kotahi NZTA	Appendix 1 ONFL 13	Support	(Support with amendment) The Table is very informative and provides plan users with helpful information. The Transport Agency considers however, that the information under "Shared/Recognised" unnecessarily complicates our agreed designation provisions where it refers to "Careful design of the highway by bridging and retention of ecological values...". This entire last sentence should be removed.	Amend the provisions: <del>"Careful design of the highway by bridging and retention of ecological values will allow the area to retain recognition as an ONF with the highway designation in place".</del>
S28/16	Waka Kotahi NZTA	functional need definition	Support	(Support in part with clarification) The Transport Agency acknowledges the inclusion of two new definitions: 'functional need' and 'operational need' from the National Planning Standards. It is unclear how 'need' will be demonstrated by plan users and clarification is sought on this aspect.	Clarify how 'need' as it relates to these provisions will be demonstrated by plan users.
S29/1	Black Fern Farms Ltd	Appendix 1 ONFL 8	Oppose	Concerned with the management and control as property owners of land affected by the landscape assessment. The access and utilisation of these affected areas has a huge impact on the way we use and interact with this land. Portions of the identified areas are currently protected and legally registered against the land titles that have been identified in this plan change, these areas are registered pursuant to the Climate Change Response Act 2002. (Emission Trading Scheme), how is this then legally annotated onto individual titles and which legal premise has precedence? The assessed land is also subject to the Horizons Regional Council 'Whole Farm Plan' programme and incorporates the 'Sustainable Land Use Initiative' (SLUi) guidelines. As a result of this there have been no adverse effects placed on the parcels of land inside the ONFL8 zone. This facility allows us as owners to manage the impacts either directly or indirectly on our farming business with sound advice and experts knowledge provided by Horizons. There are no mention of remuneration or title exchange, yet if Council wants to take control of the land then there needs to be adjustment to the legal descriptions and covenants associated with the land parcels. If you can't use it then why should we pay for it.	The proposed landscape assessed area remains under the current and future landowner stewardship and remains managed in consultation with local body authorities as is the agreed current practice.  Landowner retains continuation of existing stock grazing within the Makiekie and Limestone Creek area.  Landowner retains access rights as purchased.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S29/2	Black Fern Farms Ltd	Appendix 1 ONFL 8	Oppose	Want to retain full legal ownership and management rights. As the current owners we have continued to ensure the environmental protection and biodiversity of these areas. With the Makiekie Reserve located adjacent to this plan it appears to be just an extension to the current reserve boundaries which in turn is taking the recognition for the hard efforts of previous and current owners. Recommended that the management of the identified areas is left to the current regime and that the council focuses time and effort on more pressing issues.	Recommend that the proposed landscape assessed area remains under the current and future landowner stewardship and remains managed in consultation with the local body authorities as is the current practice. (inline with current environmental and political constraints). Retain continuation of existing stock grazing within the Makiekie and Limestone Creek. Retain our access to water. Retain our access rights. Want to be left to the 'quiet enjoyment' of our own land. Have the following questions: 1. What is the legal expression of interest that would be entered on the Deed of Title? 2. What are going to be the future stipulation on land use outside of the 'Red Line', additionally what is the width of the Red Line? 3. With the use of the term 'discretion' as stated in the plan, on who's authority is this? 4. Who will pay for the changes required under the SLUi / Whole Farm Plans?
S30/1	Phillip McRinnon	Appendix 1 ONFL 5	Unstated	The extent of the proposed areas included in this plan change need to be revised to allow farming activity to continue.	Revise extent of proposed areas affecting the farm land.
S31/1	Rochelle Paranihi	Appendix 1 ONFL 3	Oppose	Oppose on grounds have not had sufficient opportunity to provide input and the values of Ngāti Tuwharetoa are underrepresented in proposed plan change.	Want to work with Council to ensure Ngāti Tuwharetoa values are incorporated into the proposed plan change.

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S32/1	Steven Crutchley and Adele Hillas	Appendix 1 ONFL 8	Oppose	<p>Areas identified impact on legal titles which submitter has legally purchased. Under the plan change the access and utilisation of the affected areas has a huge impact on what use and interact with this land. Should plan change go ahead then lose ability to use land. If want to take control then Council should by the land. Do not want to lose ownership or management rights to farm and use own land. The identified areas have already been covered by Horizons Regional Council under 'Whole Farm Plans' which incorporates 'Sustainable Land Use Initiatives' guidelines. Question if these no longer apply to farming entities and who will cover cost of redrawing these plans? The land acts as a natural buffer and filter to help mitigate sediment and leachate issues, which helps to adapt to political and environmental pressures from Fresh Water Accord, Overseer 4, Environmental Plans etc. PC65 removes any right as legal landowners to offset current and future legislative bills, as they no longer have the flexibility to respond. Current grazing of stock in identified areas helps to reduce and mitigate any unforeseen and adverse events during feed pinches and control weed species, pasture and stock pest habits.</p> <p>Want to retain full legal ownership and management rights as they currently stand. They have continued to ensure the environmental protection and biodiversity of these areas. With the Makiekie Reserve located adjacent to this plan it appears to be just an extension to the current reserve boundaries which in turn is taking the recognition for the hard efforts of previous and current owners. Recommended that the management of the identified areas is left to the current regime and that the council focuses time and effort on more pressing issues.</p>	<ol style="list-style-type: none"> <li>1. Recommend that the proposed landscape assessed area remains under the current and future landowner stewardship and remains managed in consultation with the local body authorities as is the current practice. (in line with current environmental and political constraints)</li> <li>2. Retain continuation of existing stock grazing within the Makiekie and Limestone creek.</li> <li>3. Retain our access to water.</li> <li>4. Retain our access rights.</li> <li>5. Want to be left to the 'quiet enjoyment' of our own land.</li> </ol> <p>Have the following questions:</p> <ol style="list-style-type: none"> <li>1. What is the legal expression of interest that would be entered on the Deed of Title?</li> <li>2. What are going to be the future stipulation on land use outside of the 'Red Line', additionally what is the width of the Red Line?</li> <li>3. With the use of the term 'discretion' as stated in the plan, on who's authority is this?</li> <li>4. Who will pay for the changes required under the SLUi / Whole Farm Plans?</li> </ol>

No.	Submitter Name	Provision of Plan	Support/ Oppose	Reason	Decision Requested
S33/1	Braemoar Farms Ltd	Rules – general comment	Oppose	Disagrees with the entire proposal. Does the panel have an understanding of our land and are they independent of the council. Considers Council has more than enough of this land. Would lose 240 ha of land under PC65. To be compliant who pays for fencing, weeds, etc. Large volumes of native trees and Council must pay compensation. Lose value of property. Who pays rates? Cultural significant to larger family. Already look after this land well.	The proposal should not go ahead in this form. Landowners are the best carers of the land. Council needs to work out what is iconic. The Manawatu flat terraces are the most iconic formation. This is well researched by many people throughout NZ. The way this act is proposed, the Council has all the power requiring no financial input, but requires the landowner to pay for Councils direction, and still lose large amounts of value on land, rates etc. This act is unbalanced, written by people with little understanding of the effects to the community and the landowners. Most urban people will be impressed, knowing their rate money is being wasted on this proposal. This smirks of a land grab. If Council thinks landowners are doing a poor job of looking after this land, perhaps they should spend some of this money educating landowners on better practice. You are taking the rights of the people and replacing it with Communist principal. It would be very doubtful if Council has the personal to make this work. Suspect that even this panel has no idea of what happens in some of this land, let alone advise very experienced people looking after it. This act needs to be completely rewritten taking in all of these thoughts.