

**ENVIRONMENTAL SERVICES COMMITTEE MEETING
HELD ON WEDNESDAY 17 AUGUST 2011 IN MEMORIAL
HALL SUPPER ROOM, ESPLANADE, KAIKOURA.**

AGENDA

- 1. Apologies*
- 2. Matters of Importance to be raised as Urgent Business*
- 3. Matters Arising from the Report of 20/07/2011* *page 84*
- 4. Environmental Services Report* *page 21*
 - *Dog/Stock/Noise Control & Security*
 - *Building*
 - *Resource Planning*
 - *Resource Consent Update List*
 - *District Planning & Environmental Planning*
 - *Environmental Health*
 - *Environmental Services Budget Report* *page 31*
- 5. Proposed Regional Council Policy Statement Submission* *page 33*
- 6. Urgent Business*

• **Dog/Stock/Noise Control & Security**

Dog Control

1. In July 10 calls were received regard dogs. These mostly related to roaming dogs and minor behaviour matters.
2. A dog was reported attacking stock in the Hapuku area and a patrol attended and after some time managed to catch the dog that was responsible. The dog had killed one sheep in a paddock. The owner was contacted and the dog was subsequently destroyed and the stock owner compensated by the offending dog's owner.
3. Another barking dog matter has been resolved. This was in the Fyffe Avenue area and the dog is no longer on the property.
4. The Killarney Street dog still seems to be controlled and checks are being carried out.

Stock Control

1. Three stock calls were received. All were from the Highway and either attended or a farmer contacted who dealt with them due to the location.

Noise Control

1. No noise complaints were received.

• **Building**

There were 7 Building Consents with a combined construction value of \$427,100 issued for the month of July 2011. These consents were for:-

New dwellings x 2
Sleepout conversion
Dwelling alterations and a new boat shed
Awning for a caravan
Log fire installations x 2

There was 13 Code Compliance Certificates issued for July 2011 and currently there are 15 building consents on hold waiting for further compliance information.

There was 5 Land Information Memorandums issued for the month of July. This figure has already been exceeded in the current month.

We are processing the minor consents here and dealing with all the day to day issues. All other building consents are being sent to Steve Dale for processing.

The process of identifying Earthquake-Prone, Dangerous and Insanitary Buildings is on going however with the Building Administration Officer on leave there has been little time available to be able to complete it for this meeting. The Building Administration Officer will return to work on the 7th of September.

A large percentage of time is being taken up with enforcement issues mainly in the change of use area where food premises are being fitted out without first having plans submitted for Building Consent approval.

Another issue seems to be that some of the smaller cafes are wanting to apply for liquor licenses and don't realize that they then need to comply with the requirement for internal seating and also provide the correct toilets for their customers. The cumulative affect of the above issues consumes a lot of time. Another major factor of time consumption is that designers appear to be using us more often to check on what they are designing.

- **Resource Planning**

Resource Consent Update: From 8th of July to 9th August 2011

Six new applications for land use and 2 subdivision applications were received.

Notified Consents

Marine Hotels Ltd, 191 Beach Road. Land use – addition of accommodation units. Notification has closed with 3 submissions received in opposition. A hearing has been set for the 20th of September.

Monitoring

Monitoring of consent applications and complaints is ongoing. Staff are currently working with property owners to obtain resource consents for non-consented visitor accommodation.

Although traditionally winter has been a slow period for resource consents this gives staff time for end of the financial year reconciliations and monitoring of existing resource consents. This period is also becoming busier with planning staff assisting with the implementation of the Civic Authority computer system. Staff are also becoming acquainted with the new regional plans, national policy statements and have completed the biannual Ministry for the Environment Survey.

• Resource Consent List Update

RESOURCE CONSENT UPDATE LIST FOR THE PERIOD FROM 8th JULY 2011 TO 9TH AUGUST 2011.

Resource consents decisions issued:

Type of Consent	Applicant	Address of Activity	Number of New Lots / Guests
Land Use- Visitor Accommodation up to 4 guests	Lynn Wilks	306 Scarborough Street	4
Land Use -Visitor Accommodation up to 8 guests	R D Hughes Developments	5 McRae Gardens	8
Land Use -Visitor Accommodation up to 8 guests	BC Horne & TCM Candy	11 McRae Gardens	8
Land Use- Visitor Accommodation up to 4 guests	The Gardners Limited	5 Brighton Street	4
Land Use- Visitor Accommodation up to 8 visitor accommodation	Reid Investment Properties	164 Torquay St	8

Active consent applications currently in process:

Type of Consent	Applicant	Address of Activity
Building shed with encroachment on road boundary	Department of Conservation	Ludstone Road
Building in archaeological site	Leigh Archbold	131 Sthbay Parade
Land use – upgrade existing electricity lines	Marlborough Lines Ltd	Waipapa Bay
Subdivision Boundary adjustment and non complying existing garage	Peter Diver	178 & 180 Torquay St
Subdivision to create extra lot and building dwelling in flood zone	F L McGovern	59 Athelney Road
Relocate dwelling and non compliance boundary encroachment	David A M Swift	101b Southbay Parade

Consent applications awaiting receipt of further information requested from applicant or on hold:

Type of Consent	Applicant	Address of Activity
2 stage subdivision - 5 lots	RP & EF Wilson	219 Beach Road
Land use – Visitor Accommodation up to 4 guests	Ian & Wendie Partner	11 Sunrise Place, Kekerengu
Land Use – Visitor Accommodation up to 4 guests	R W Low	4 Valley Road, Goose Bay

Land use – addition of accommodation units	Marine Hotels Ltd	191 Beach Road
Subdivision 2 extra lots	McKenzie & Saint Martins Trustee Services Ltd	1370 Shwy 1
10 Lot Subdivision & Land Use	2 Crush NZ Ltd	Mt Fyffe Road
2 lot subdivision	Tormar Holdings Ltd	Cnr Margate & Torquay Streets
Subdivision- Boundary adjustment	Kaikoura District Council	Maui Street
Sign Consent	The Woolshed - Davidson	Beach Road
Signs Consent	Wilson*	State Highway 1, Hapuku
Subdivision- Separation of existing title	Matariki Farms	State Highway 1 Clarence
Subdivision: 2 lot subdivision & dwellings	Reardon SJ & AR	19 Old Beach Rd
Land Use- Visitor accommodation 2 guests and non-compliance with height standard	N Mitchell	13 Swyncombe Place

Consent applications subject to appeal under sections 120 and 358 of the Resource Management Act:

Type of Consent	Applicant	Address of Activity
NONE		

Consent applications subject to objections under section 357 of the Resource Management Act:

Type of Consent	Applicant	Address of Activity
NONE		

Consent Applications declined:

Type of Consent	Applicant	Address of Activity
NONE		

Consents withdrawn:

Type of Consent	Applicant	Address of Activity
NONE		

Consents returned as incomplete:

Type of Consent	Applicant	Address of Activity
NONE		

Consent applications subject to application for declaration under section 311 of the Resource Management Act: Nil

* Denotes Retrospective Consent

• **District & Environmental Planning**

District Plan & Environmental Planning Report Covering 12 July to 10 August 2011

National Policy Statements

Draft New Zealand Energy Strategy and Draft New Zealand Energy Efficiency and Conservation Strategy

This submission has been lodged but no date for a hearing has been set.

Proposed National Policy Statement on Indigenous Biodiversity

A submission has been lodged, no correspondence has been received on this.

National Policy Statement for Renewable Electricity Generation 2011

An implementation guide is currently being prepared by Boffa Miskell on behalf of Ministry for the Environment. After the document is released it is proposed to run a workshop with Councillors to discuss what changes are required to our District Plan.

Canterbury Regional Council

Second Generation Natural Resources Regional Plan (NRRP)

Nothing further has been heard about the second generation NRRP (which aims to simplify the current NRRP) the process is still progressing.

Regional Land Transport Strategy (RLTS)

Nothing has been heard on this item.

Canterbury Regional Policy Statement (CRPS)

Council's draft submission is attached for review and approval refer page 33.

Rugby World Cup

The design of the Information Boards is complete, the boards are currently being printed and will be delivered to Kaikoura on completion. The carving is being finalised for the central structure. The support structure will be built by the new West End action group.

Te Korowai

The drafting of the strategy is now being completed with most major issues having been discussed by the group. The launch for the Strategy will be 1st September 2011. Invitations will go directly to Councillors from Te Korowai.

Zero Waste

Household recycling crates for the urban area have been collected by residents. From Thursday 11th August, no recycling will be collected in bags or bales.

Coastal Management Strategy

The Lions Club have almost completed construction on the Jimmy Armers walkway, this section of walkway will complete the sections that were done last year and make a complete walking track from Jimmy Armers Beach to the Seal Colony.

- **Environmental Health**



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DRINKING WATER MONITORING AND COMPLIANCE REPORT

FOR THE MONTH OF: JULY 2011

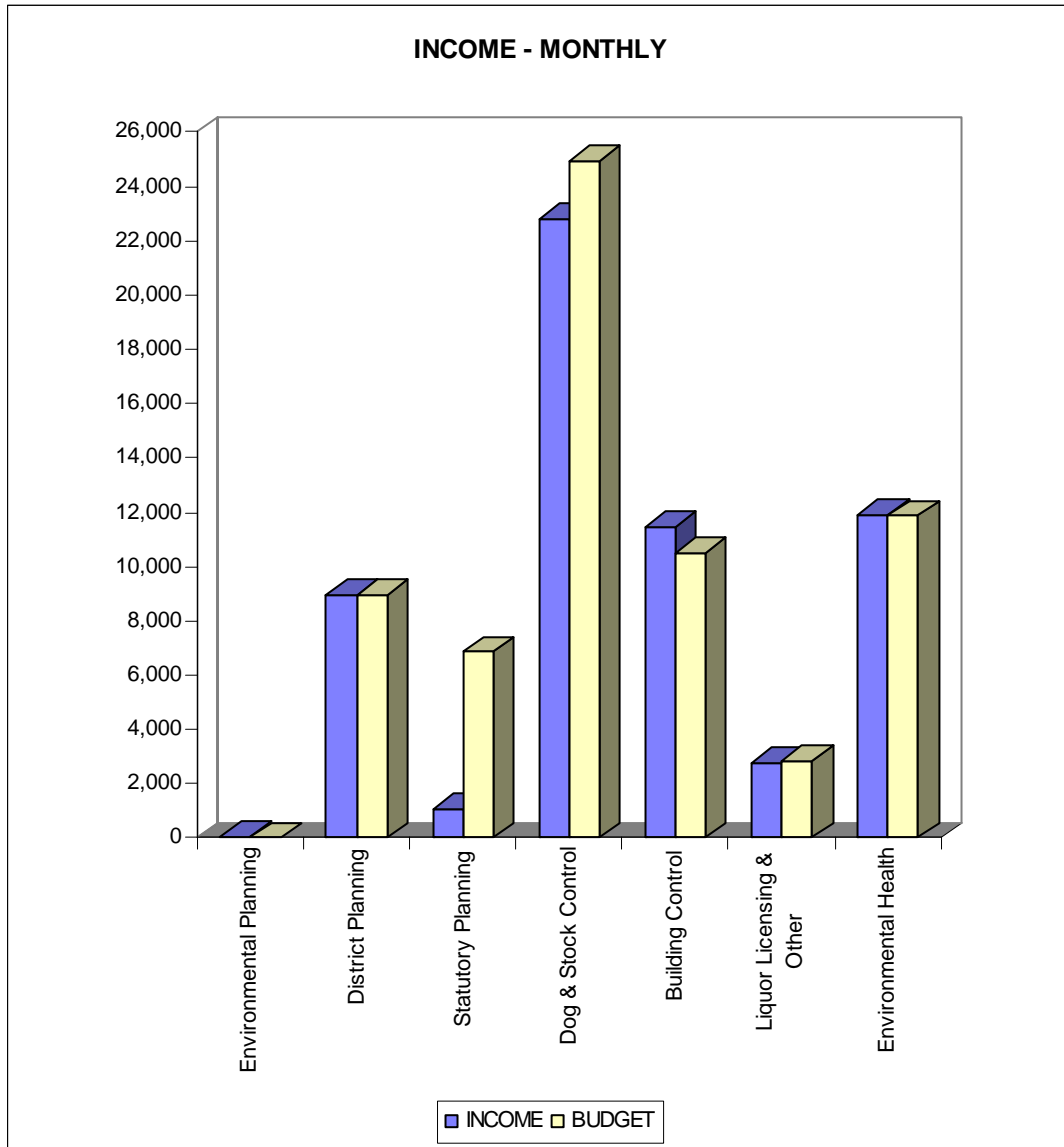
WEEK: 1	DATE: 04.07.11					
Reference Number	WINZ code	Time	Sample Site and Code	Total Coliforms	E.Coli	FAC
			Kaikoura Township Reticulation KAIUR (1) Alt @ Jimmy Armers Beach Toilet Block			
FEY0542	KAI004KU	3:45	Kaikoura Township Reticulation KAISR (2) Alt @ O Woods: Mt Fyffe Road	<1	<1	0.06
			South Bay Reticulation KAISBR (1) Alt @ DOC Toilets: South Bay			
FEY0543	KAI004SB	4:00	South Bay Reticulation KAISBR (2) Alt @ Coastguard: Sewer Pump Station	2.0	<1	0.05
FEY0544	FER003FE	4:15	Fernleigh Reticulation FERNR (1) Alt @ R Jones: Lake Hills	<1	<1	0.76
FEY0545	TP01002	4:30	Fernleigh Source FERNS (1) @ Dairy Farm Inland Road Junction	<1	<1	1.65
WEEK: 2	DATE: 12.07.11					
Reference Number	Winz Code	Time	Sample Site and Code	Total Coliforms	E.coli	FAC

FEY0548	KAI055KA	13:40	Kaikoura Suburban KAIWS (1) @ Brunnels Road	<1.0	<1.0	0.61
FEY0549	TP00217	13:45	Kaikoura Suburban KAIWR (1) @ Postmans Road	<1.0	<1.0	0.99
FEY0547	TP02772	13:30	Kaikoura Township Source KAINMB (1) Main Bore @ Mt Fyffe Road (Mackle Bore)	<1.0	<1.0	0.05
FEY0555	KAI004KU	15:25	Kaikoura Township Reticulation KAIUR (1) Alt @ Jimmy Armers Beach Toilet Block	1.0	<1.0	0.04
	KAI004KU		Kaikoura Township Reticulation KAISR (2) Alt @ O Woods: Mt Fyffe Road			
FEY0556	KAI004SB	15:40	South Bay Reticulation KAISBR (1) Alt @ DOC Toilets: South Bay	<1.0	<1.0	0.04
	KAI004SB		South Bay Reticulation KAISBR (2) Alt @ Coastguard: Sewer Pump Station			
FEY0550	TP01001	13:55	Kincaid Source (KINS (1) @ Grange Road Bridge	<1.0	<1.0	0.53
FEY0554	KIN003KI	15:05	Kincaid Reticulation KINR (1) @ Hapuku School	<1.0	<1.0	0.44
FEY0560	TP01000	16:30	Peketa Source PEKS (1) @ Bore R Hails, Rakauni Road	<1.0	<1.0	
FEY0561	PEK002PE	16:35	Peketa Reticulation PEKR (1) @ hydrant tap pn Bullens Road	<1.0	<1.0	0.04
FEY0558	TP01002	16:00	Fernleigh Source FERNS (1) @ Dairy Farm Inland Road Junction	1.0	<1.0	0.04
FEY0559	FER003FE	16:15	Fernleigh Reticulation FERNR (1) Alt @ R Jones: Lake Hills	<1.0	<1.0	0.04
	FER003FE		Fernleigh Reticulation FERNR (2) Alt @ Kowleigh Inland Road			
FEY0562	TP00998	16:50	Oara Source OARNS (1) @ New Bore: Oaro River	<1.0	<1.0	
	OAR001OA		Oaro Reticulation OARNS (1) Alt @ T Smith: Oaro M			

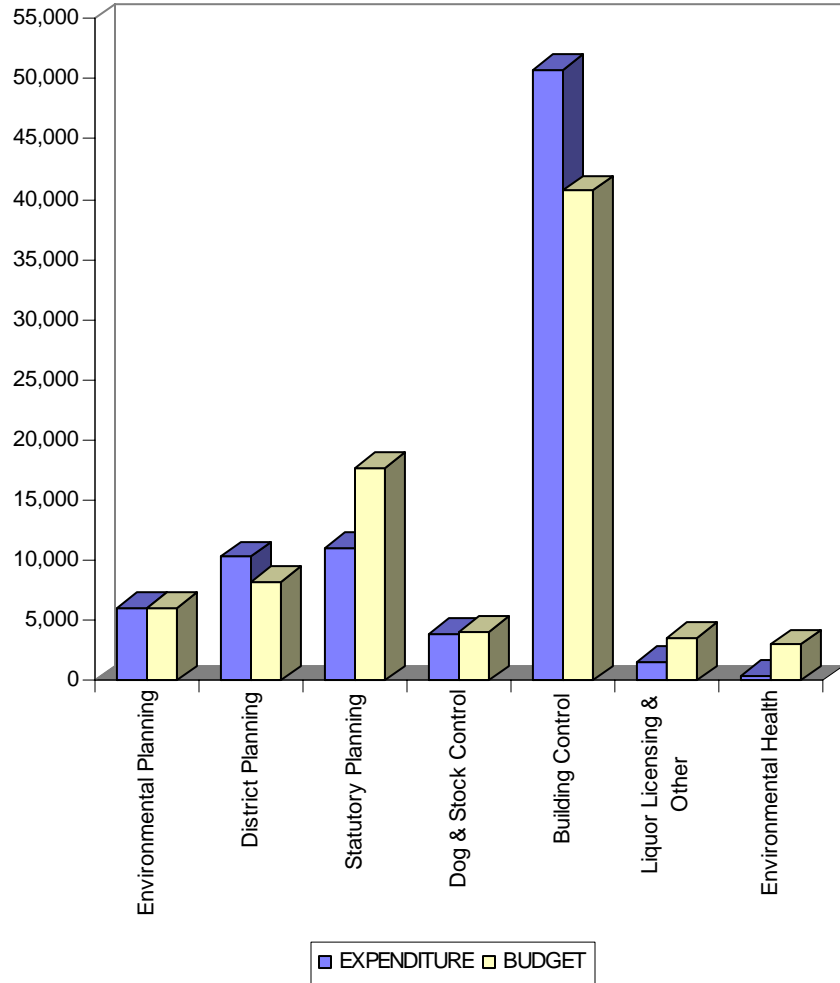
FEY0563	OAR001OA	17:00	Oaro Reticulation OARNS (2) Alt @ K Semmens: North Side	4.2	<1.0	
FEY0551	KAI021EA	14:20	East Coast System Reticulation CLECR (1) @ hydrant behind Woodbank School	2.0	<1.0	
FEY0552	TP01003	14:30	Clarence / East Coast System Source CLECS (1) Wellhead at pumpshed	<1.0	<1.0	
FEY0557	TP02879	15:50	Ocean Ridge	<1.0	<1.0	
WEEK: 3	DATE: 21.07.11					
Reference Number	WINZ code	Time	Sample Site and Code	Total Coliforms	E.Coli	FAC
FEY553	KAIOO4KU	15:40	Kaikoura Township Reticulation KAIUR (1) Alt @ Jimmy Armers Beach Toilet Block	1.0	<1	0.06
			Kaikoura Township Reticulation KAISR (2) Alt @ O Woods: Mt Fyffe Road			
FEY570	KAI004SB	15:31	South Bay Reticulation KAISBR (1) Alt @ DOC Toilets: South Bay	<1	<1	0.07
			South Bay Reticulation KAISBR (2) Alt @ Coastguard: Sewer Pump Station			
FEY571	FER003FE	15:10	Fernleigh Reticulation FERNR (1) Alt @ R Jones: Lake Hills	<1	<1	0.06
FEY572	TP01002	14:57	Fernleigh Source FERNS (1) @ Dairy Farm Inland Road Junction	1.0	<1	0.08
WEEK: 4	DATE: 29.07.11					
Reference Number	WINZ code	Time	Sample Site and Code	Total Coliforms	E.Coli	FAC
			Kaikoura Township Reticulation KAIUR (1) Alt @ Jimmy Armers Beach Toilet Block			
FEY564	KAIOO4KU	15:15	Kaikoura Township Reticulation KAISR (2) Alt @ O Woods: Mt Fyffe Road	<1	<1	0.24

			South Bay Reticulation KAISBR (1) Alt @ DOC Toilets: South Bay			
FEY567	KAI004SB	16:00	South Bay Reticulation KAISBR (2) Alt @ Coastguard: Sewer Pump Station	<1	<1	0.15
FEY565	FER003FE	15:25	Fernleigh Reticulation FERNR (1) Alt @ R Jones: Lake Hills	<1	<1	0.20
FEY566	TP01002	15:35	Fernleigh Source FERNS (1) @ Dairy Farm Inland Road Junction	<1	<1	0.12

Environmental Services Budget Report



EXPENDITURE - MONTHLY



Proposed Canterbury Regional Policy Statement

Issue

The Proposed Canterbury Regional Policy Statement was notified for submission on 18 June 2011. Staff have been involved in formulation of the document since 2006, with attendance at consultation meetings and provision of feedback.

Discussion

Process for Feedback

Council has been involved in formal consultation with the staff working group on this document since 2006. It is heartening to note that there have been a lot of changes due to recommendations and feedback from the Territorial Authority working group. There are still aspects of the document that staff are unhappy with and these are included in the submission.

Please note, given that submissions were due on the 15th August 2011, a draft of this document has already been lodged with Environment Canterbury. Following endorsement from the Environmental Services Committee, a final submission will be lodged with Environment Canterbury.

Issues

The submission lodged is in regard to issues that were raised previously with Environment Canterbury staff. Staff were successful in having the local Marine Facilities Zone recognized in the document as regionally significant infrastructure with subsequent protection for this infrastructure. This will then filter down to other regional documents.

Staff are still disappointed that there will be provisions on matters such as landscape and biodiversity and rural land use. Staff feel that these matters are not for regional council control as these matters were already litigated and considered during formulation of our own District Plan. Other issues are outlined in the attached document.

Summary of Kaikoura District Council Submission - Canterbury Regional Policy Statement (CRPS)

Submissions on the CRPS closed on 15th August 2011; Kaikoura District Council staff have obtained an extension to allow Council to comment on the staff submission before it is formally sent.

The CRPS is the overriding planning document for Canterbury. Appeals on the Environment Canterbury Commissioners decisions can only be made on points of law and once the CRPS becomes operative Kaikoura District Council must “give effect” to the document. Giving effect to the document will require amendments to our District Plan. The exact amendments will depend on how the CRPS is interpreted. The submission aims to ensure the direction of our districts growth and the style of that growth can be encouraged and maintained. The submission also aims to avoid unnecessary/unreasonable costs to the district.

The CRPS contains 19 chapters which focus on significant resource management issues for Canterbury. Although submissions have been made on all chapters and the document contains many positive aspects which are supported by the submission the key areas of potential conflict are discussed below:

Chapter 5 Land Use and Infrastructure

This chapter focuses on the general development of the urban areas of Canterbury. Of particular concerns are:

- The definitions of terms “urban growth” and “rural residential development” which would see growth for the district focused on the township of Kaikoura and prevented in other areas. Our rural subdivision allotment size may have to be increased, depending on how these terms are finally defined.
- A three year time frame to make provision for papakianga (Maori settlement) housing
- Plan changes would have to be accompanied with structure plans regardless of the size of the additional zoning.

Chapter 7 Fresh Water

Emphasis is placed on the importance of the outcomes of the Canterbury Water Management Committee for each area. Matters of contention are largely limited to who is responsible for the different functions. Currently policy seeks local authorities to control land use changes in respect of freshwater. It is considered that this is a regional function as opposed to a district function and Kaikoura District Council should not be limiting farming types to reduce effects on freshwater.

Chapter 9 – Ecosystems and Indigenous Biodiversity

We will be required to review our criteria for significant biodiversity; however we will only be required to do this when we update our District Plan in 2018. The approach is considered acceptable.

Chapter 11 Natural Hazards

Support is given to recognition that only known hazards can be mapped. Policy currently seeks that District Council manage new development in relation to hazards. The identification of such hazards could be very costly for district councils and it is considered that the Regional Council should be the lead agency for the identification of hazards (with the exception of new subdivision which must be addressed by the District Council at time of subdivision).

Chapter 12 Landscapes

Review the location of our district outstanding landscapes based on new criteria for outstanding landscapes. For the Kaikoura District Council, this review must be completed within 7 years.

Chapter 13 Historic Heritage

Although changes to our plan are only required by 2018 the heritage chapter introduces the terms “Historic cultural and historic heritage landscapes” such a term is likely to lead to misunderstanding and conflict as to what areas should be protected. It is considered better to avoid “historic heritage landscapes” and use “sites, places and areas.”

Chapter 14 Air

A move exists in part of the chapter to have District Councils undertake some of the functions of the regional council by ensuring activities which discharge contaminants to air are appropriately located. This is a matter which district council do not have the scope to control.

Chapter 15 Soils

Method exist requiring District Council to prevent activities which may “foreclose the ability to utilise soils”. This appears to be a move back to the versatile soils approach and creates a concern with regard to land use constraints.

Chapter 19 Waste Management and Minimisation

Waste management is now able to be addressed through a Waste Management Plan and Bylaws under the Waste Management and Minimisation Act. It is an unnecessary burden to require duplication of these provisions in a District Plan.

Conclusion

The submission lodged on the Proposed Canterbury Regional Council Regional Policy Statement was considered to be in accordance with Kaikoura District Community feedback on the District Plan process and the intention of the LTCCP.

Recommendation

With due consideration of the above, it is recommended that the Council make the following determinations:

1. Discussion

That Council receives the information outlined in this report.

2. Feedback

That Council endorses the formal feedback on the Proposed Canterbury Regional Council Regional Policy Statement

PROPOSED CANTERBURY REGIONAL POLICY STATEMENT 2011 SUBMISSION

1. The Kaikoura District Council (KDC) staff were part of the collaborative drafting team which met during June and July 2010 and we are grateful for the opportunity to participate in the process. We have supported the concept of a draft and provided feedback on this draft. We are supportive of this more recent collaborative approach and will assist where we can. In particular we would like to thank the Environment Canterbury staff who assisted in providing a gap analysis of the District Plan which has assisted in refining what the key issues for the district will be. The ongoing discussions on the Canterbury Regional Policy Statement (CRPS) reflect that we are developing the “CRPS” as opposed to a “Canterbury Regional Council Policy Statement (CRCPS)”. The document should therefore reflect the desired outcomes for the region as a whole. Kaikoura District Council is aware the Environment Canterbury Act prevents appeals on the CRPS to the Environment Court. We see this submission as the final opportunity to have input to the regions most significant planning documents.
2. Discussion has occurred with Council’s elected members on the CRPS. This submission has been submitted to the Council meeting on 17th August 2011 and formally endorsed.

About Kaikoura District

3. As background to our position Kaikoura District is the smallest local authority in Mainland New Zealand. The Kaikoura District spans from the Haumuri Bluffs in the south to the Kekerengu valley in the north, covering 2,048 square kilometres of diverse landscape. Kaikoura District is located between the Pacific Ocean and the Inland Kaikoura Range. We have wonderful diversity in our district and range from sea level to snow capped mountain of 2,885 metres. The spectacular coastline provides excellent fishing, sporting and recreation for Kaikoura’s residents and visitors. The Kaikoura Canyon, at around 1,300 metres deep, provides the natural habitat for the sperm whale, and is also host to over 200 species of marine life. The Kaikoura coastline also experiences a large number of migratory and visiting whale and dolphin species close to shore. The regular visitors include Southern Right Whale, Orca, Humpback, Sperm Whale and Dusky and Hector Dolphin Species.
4. Historically the District has thrived in the fishing, farming and forestry industries. Today Kaikoura is a world-class tourism destination, yet still maintains its fishing and farming

heritage. The District boasts award-winning restaurants, cafés and accommodation facilities, wineries and modern small boat facilities.

5. The vision for the district is described in the Long Term Council Community Plan as:

“The Kaikoura community displays responsible custodianship of its unique natural, social, cultural and built environmental resources by ensuring the sustainable utilisation and management of these resources.

It is a community that treasures the present small-scale town atmosphere and retains and enhances this coastal village character.”

6. We are entwined with the natural environment and our future depends on it. We are a lead agency for environmental sustainability and use a voluntary environmental certification scheme to measure the Community’s environmental impact. The Community has been collecting environmental impact data since 1999, and has achieved Environmental Certification every year since 2004. Being a small council the “silos” which are often found in large organisation are easy removed and our size also ensures that we are well grounded to the community. Turning to the development of our District Plan in August 1994 we submitted a draft Kaikoura District Plan and finally after much consultation in May 2000 we notified our Proposed District Plan. This plan was subject to various submission and litigation and after much cost to the Council was made operative in June 2008. The PCRPS like any future Kaikoura District Council Plans are second generation plans which allows us to build on our understanding of the past and avoid reinventing the wheel. More importantly if the second generation plans are well researched we should be able to avoid re-litigation of resolved issues and unnecessary costs to the ratepayers.

What do we want from the CRPS

7. Being a small council we want a CRPS which allows the District to develop within its vision (as stated above under our vision). We want the ability for our district to grow and prosper in a way which is environmentally, socially, culturally and economically responsible. We want a holistic document which reflects “good regulatory practice”

Government's *Code of Good Regulatory Practice* aims to ensure laws have the following attributes:

- (1) Transparency to both the decision makers and those affected by regulation.
- (2) Have clarity, being understandable and accessible as well as practicable.
- (3) Should be fair and treat those affected equitably.
- (4) Is minimum necessary to achieve desired outcomes.
- (5) Compliance costs should be reasonable with minimal fiscal impact.
- (6) Are compatible internationally.
- (7) Do not place unnecessary cost burden on rate payers to comply or indirectly on rate payers for KDC to implement costly policies.

We want good policy. We want the policy document to “Keep it Simple” (KIS), complex policy leads to misunderstanding, conflict and unnecessary costs.

8. In general we believe the PCRPS fits well with these points however there are areas which we believe could be refined. These are not wholesale changes but matters which are appropriate to resolve before the document is finalised. We thank you for your time in considering this submission.

(1) The specific provisions of the proposal that our submission relates to are:	(2) Our submission is that:	(3) We seek the following decision from Environment Canterbury:
Chapter 1 Introduction	KDC supports in part Chapter 1. KDC would like the following amendments to Chapter 1:	Retain Chapter 1 with amendments as follows:
1.3.3 Implementation Last sentence, last paragraph	KDC oppose the implementation proposed in the wording “ <i>this may include submission and appeals on resource consents, plan changes and plan reviews, as well...</i> ” KDC believe it is an unnecessary burden on individuals and applicants to have to face submissions from the Canterbury Regional Council. This may also be contrary to the Triennial Agreements.	That the implementation is reworded to: <i>Where there is conflict between the implementation of the objectives, policies and methods of the CRPS and any resource consents, plan changes and plan reviews Canterbury Regional Council will work to resolve these issues outside the statutory process. This may include discussions, mediations and agreements. Only as a last resort will submissions and appeals be lodged.</i>
Chapter 2 Issue of resource management significant to Ngai Tahu	KDC supports in part Chapter 2. KDC would like the following amendments to Chapter 2:	Retain Chapter 2 with amendments as follows:
Page 11 – Map labels missing	Insert missing map labels Waimakariri River Ashley River/Rakahuri Kahutara River Kaikoura Peninsula Kowhai River Hapuku River	Amend map by inserting labels
Page 12 - Map Key Last Icon – Te Waihora Incomplete sentence	Reword or complete the sentence	Complete the sentence in the key
Page 14 Section 2.2.6 Taonga	NTCSA not defined on this page	Cross reference to earlier definition
Chapter 3 Resource management	KDC supports in part Chapter 3. KDC would like the following amendments to Chapter 3:	Retain Chapter 3 with amendments as follows:

processes for local authorities		
3.1.1 – Implementation of the Canterbury Regional Policy Statement by local authorities through plans	The clear defining of the terms “Will”, “Should”, “May” is supported. It is considered the term “Should” explanation requires refining. The current description states that “should” indicates a course of action which will be undertaken and good reasons are required if those actions are not undertaken. The defining of “good reasons” may result in disputes between CRC and local authorities. Such disputes are likely to be costly for both parties. If the policy frame work uses the term “should” a less mandatory description must be used to reflect how should shall be used.	Ensure that parties are not compelled to undertake should statements Amend the explanation of “Should” to read: Should indicates an expectation that a course of action will be undertaken to implement the policy. However, parties cannot be compelled to take these actions, as there may be good reasons for the local authority to choose not to take that action...
Page 21 Section 3.1.2 Fifth paragraph	Oppose the requirement for territorial authorities to collect data on behalf of the Canterbury Regional Council. This is an unfair burden on small local authorities and in many cases is outside the core functions which the territorial authorities perform. Monitoring depends on data from the territorial authorities. For territorial authorities it is important for this document to reflect the expectation of who should pay for the provision of this information.	That the paragraph be reworded to direct territorial authorities to share information which is already collected, but to avoid an additional burden on territorial authorities which haven’t the resources to undertake additional monitoring. Suggest additional wording to last paragraph: “The Canterbury Regional Council will undertake a work programme to identify data the territorial authorities are to collect, and to make arrangements (including addressing costs) for collection and sharing of data.”
Page 22 Section 3.1.7	Provision of a joint hearing does not fit with KDC’s community decision making model	Add then ... <i>a joint hearing must be held with commissioners appointed in consultation with all local authorities and Runanga, unless...</i>
Page 22 Section 3.1.6 First sentence	Correct Typo <i>tWhen</i>	Correct Typo <i>tWhen</i>
Chapter 4 Provision for Ngai Tahu and their relationship with	KDC supports Chapter 4.	Retain Chapter 4

resources		
Chapter 5 Land-use and infrastructure	KDC supports in part Chapter 5. KDC would like the following amendments to Chapter 5:	Retain Chapter 5 with amendments as follows:
Objective 5.2.1- Location, design and function of development.	Development includes all forms of development “including papakainga and marae”. The inclusion of these terms appears unnecessary. If seen to be necessary a definition of development could be included in the glossary and definitions section.	Remove the words “including papakainga and marae”. Define the term “development” in glossary and definitions chapter.
Policy 5.3.1- Regional growth	Support is given to Policy 5.3.1 (5) Kaikoura District Council has signed up to the Urban Design Protocol.	Retain Policy subsection 5.3.1(5)
Page 33 Policy 5.3.1	<p>Kaikoura District Council has concerns with the use of terms <i>urban growth</i> and <i>rural residential development</i>. The Section 32 analysis is deficient in concluding how the terminology was arrived at.</p> <p>The terminology is not appropriate and does not fit with the intention of the policy. The policy would be better to focus only on urban growth. The reference to rural residential appears to be an adjunct to the main intention of the policy. In addition, the definition of rural residential appears to be referring to large lot residential. If this is indeed the case, the reference to rural residential could be omitted from the policy to make it less confusing.</p> <p>The definition may open the debate on what level of development constitutes rural residential development. It is unclear if the definition is seeking to capture all development in the rural area which is non-urban. If this is the case, then the policy and the definition would be problematic in defining a difference between what is “rural” and what is “rural residential”. See additional comments on “Glossary and Definitions”. Our reading of the current definition results in urban areas being only these areas which are predominantly non-agricultural or non-rural in nature. This would prevent further development at</p>	<p>The policy be reworded to focus on urban development. Delete subsection (1) and renumber subsequent subsections, so the policy reads...</p> <p><i>To provide, as the primary focus for meeting the wider region’s growth needs, sustainable urban patterns that:</i></p> <p>(1) <i>encourage within urban areas, housing choice and business opportunities of a character and form</i></p> <p>...</p> <p>(2) ...;</p> <p>(3) ...;</p> <p>(4) ...</p> <p>Consequential Amendment: Amend definitions to ensure that growth occurring around existing settlement patterns.</p>

	<p>Clarence and Kekerengu however would allow development at places such as Goose Bay as this area would be seen as a village, which relies on tourism as opposed to agriculture. Such an approach has little planning merit, it is more appropriate to group growth to existing settlement patterns.</p>	
	<p>The intent of the policy is covered in the Section 32, but not the wording. The social advantages of the policy stated in Section 32, are to be <i>potential for high levels of connectivity...</i> <i>Reduce transport cost and provision of public transport to provide and service future development...</i> Given this, how will retrofitting of existing communities occur? The Policy is confusing on how urban development and attached urban growth achieves these goals.</p>	
Policy 5.3.1	<p>Kaikoura District Council has concerns with the term “...that concentrates, or is attached to, existing urban areas and promotes...” The policy promotes urban sprawl. Consolidated form can occur without attachment to existing urban areas. The terms result in the policy promoting urban sprawl and reliance on vehicles rather than requiring new areas to be developed as communities or hubs of activity. The methods do not give effect to this part of the policy.</p>	Policy wording is amended as in previous item to take into account growth that does not promote urban sprawl.
Policy 5.3.1 Method 1	<p>Method one needs to be strengthened. The CRLTS does not achieve sustainable land transport. The method needs to include working with territorial authorities and New Zealand Transport Agency to achieve sustainable transport outcomes for the region. The method should also promote co-ordination of a regional voice at national level.</p>	to be reworded

Policy 5.3.1 Methods 2	Reword Method 2 to exclude rural residential development and the reference to consolidated urban patterns	Reword to read ..approach for the integrated management of urban development with the primary focus on ensuring well-designed and more sustainable urban patterns.
Policy 5.3.1 Explanation	Subsequent amendment	Remove references to rural residential in the explanation
New Policy	Add a new policy which deals with the effects of rural residential development which the document is trying to avoid.	Add new policy: To provide for rural residential development as large lot urban development
Policy 5.3.2	Subsection (1) of the policy repeats Policy 5.3.1. Subsection (2) of the policy repeats <i>regionally significant infrastructure</i> , so that the policy reads: <i>To enable development and new regional significant infrastructure which ensures that adverse effects are avoided or mitigated including where these would compromise or foreclose</i> <i>(a) regionally significant infrastructure...</i>	Reword policy to say “(a) existing regionally significant infrastructure”
Policy 5.3.2 Method 1	The Canterbury Regional Land Transport Strategy does not achieve sustainable land transport. The method needs to include working with territorial authorities and Land Transport New Zealand to achieve sustainable transport outcomes for the region. In addition co-ordination of a regional voice at national level.	Method to be reworded
Policy 5.3.2 Method 3(b) & (c)	Method 3 (b) & (c) should be a method for <i>local authorities</i> as applies to Canterbury Regional Council to manage adverse effects	Move method to local authorities

Policy 5.3.3	No qualifier for the term <i>substantial developments</i> . The rural residential definition makes this policy unclear in its implications. It is difficult for TA's to consider the implication of the policy when it is unclear how it will be implemented in regard to the difference between rural and rural residential	Qualify substantial development
Policy 5.3.3 Method 3 (b)	Method needs to be clear that TA's can outline a rule in the District Plan requiring an outline or concept plan to be lodged at time of application for a substantial development	Reword method
Policy 5.3.4 - Papakainga housing and marae	Support is given to the provision of "Papakainga housing and marae"	Reword method (2) (2) Within 5 years from the date...
Policy 5.3.4 Method for territorial authorities	Three years is insufficient time to implement the method where research is required or for small territorial authorities where resourcing is an issue. The work includes identifying areas of "ancestral land" and the owners of that land. Time is needed to consult the numerous owners of ancestral land.	Extend the timeframe to 5 years
Policy 5.3.4 Method (2) a	Method 5.3.4(2) is a contradiction in terms. The policy seeks to address occupation of ancestral land, but this method seeks District Plans to provide for beneficial owners only where the land has already been through the Maori Land Court process. There are instances where beneficial owners have been separated from ancestral land through alienation or instances where ancestral land is in freehold title. In addition the explanations states that <i>Ancestral land is not confined to land remaining in their ownership as Maori freehold or Maori customary land....</i>	Reword method to implement policy and explanation wording.

Policy 5.3.5 Method 3(b)	The requirement to insert an outline development plan in the District Plan at the time of rezoning any land is considered to be superfluous. An outline plan could be required outside the District Plan process, but the requirements covered in methods 3(a)&(c) cover all the issues that an outline plan may encompass.	Delete Method 3(b)
Policy 5.3.6 Method 3(d)	The requirement to insert an outline development plan in the District Plan at the time of rezoning any land is considered to be superfluous. An outline plan could be required outside the District Plan process, but the requirements covered in Policy 5.3.5 methods 3(a)&(c) cover all the issues that an outline plan may encompass, in addition there may be instances where an outline plan is not warranted, eg a small lot rezoning or spot zone.	Delete Method 3(d)
Policy 5.3.12	This policy is difficult to understand in that terms such as <i>avoiding development</i> and <i>fragmentation</i> are used. It seems this may ignore that some smaller rural lots are also productive, or provides another layer of complexity when looking at rural land use changes.	Clarify the intent of the policy with regard to rural land use
Chapter 6 Development of Greater Christchurch	KDC supports Chapter 6	Retain Chapter 6
Chapter 7 Fresh water	KDC supports in part support Chapter 7. KDC would like the following amendments to Chapter 7:	Retain Chapter 7 with amendments as follows:
Policy 7.3.2 – Natural character of braided rivers and lakes.	Discussion have occurred in past resource consent hearing as to if certain Kaikoura rivers should be seen as a “braided river” or not. It would be useful to have greater certainty as to which specific rivers or section of rivers are considered to be a braided river.	In the principal reasons and explanation or within a separate appendix list the braided river of Canterbury.
Policy 7.3.3 – Enhancing fresh water environments and biodiversity	The methods provided may result in dual consents being required from both the Canterbury Regional Council and territorial authorities. This is likely to result in the public becoming frustrated.	Include additional method: (1)(c) Include standards in a district plan that removes the requirement for resource consent from the territorial authority, if resource

		consent is granted by the Canterbury Regional Council for the same purpose.
Policy 7.3.7 – Water quality and land uses	Method 2 seeks District Plans to control land use changes in respect of freshwater. There are many land use changes that can occur as part of permitted rural use that are not sought to be controlled at a district plan level, for example farming. When reading the Policy along with the principal reasons and explanation, it seems that the method is trying to impose land use controls for permitted activities through any land use changes. Support is given to a holistic approach for water management however this must be contained within the functions of the Act. The method goes beyond the Section 31 functions of territorial authorities and more appropriately fits within the Section 30 function of the regional council (Refer Section 30(1)(c)(ii)). Method (2) should be reworded.	Reword Method as follows: <i>(2) Work together to manage the adverse effects of land uses on freshwater quality including appropriate controls on land-use change in regional plans and maintenance of indigenous biological diversity in relation freshwater in district plans. This may include a holistic approach to the management of the ...</i>
Chapter 8 The coastal environment	KDC supports in part Chapter 8. KDC would like the following amendments to Chapter 8:	Retain Chapter 8 with amendments as follows:
Objective 8.2.1 Principal reasons and Explanation	Last paragraph typo ...information shortfalls where information <i>is are</i> considered	Delete <i>are</i>
Objective 8.2.1, Objective 8.2.2 & Objective 8.2.3	Support the Objectives	Retain the objectives as written
Policy 8.3.1 Subsection (1)	Typo in subsection (1) environment misspelled	Correct typo
Policy 8.3.1	Support for Policy	Retain the Policy
Policy 8.3.2	Support for Policy	Retain the Policy
Policy 8.3.5	Support for Policy	Retain the Policy
Chapter 9 Ecosystems and indigenous biodiversity	KDC supports in part Chapter 9. KDC would like the following amendments to Chapter 9:	Retain Chapter 9 with amendments as follows:
Objective 9.2.1 – Halting the decline of Canterbury’s	The blue table contains a numbering error	Amend number area

ecosystems and indigenous biodiversity.		
Policy 9.3.1 – Protecting significant natural areas	<p>Parts 2) and 3) have been added to this policy since the draft CRPS. The use of “meet one or more” creates confusion. It is understood that the criteria should be used to make a holistic assessment of the 12 points listed in appendix 4. The policy however could be read that only one of these points needs to be met to result in protection. It is not considered appropriate to protect an area simply because “The site contains indigenous vegetation or an indigenous species at its distribution limit within Canterbury Region ...” A species may occur at its north distribution limit in Canterbury however be common in Marlborough.</p> <p>In 3) the use of the term “protected” creates sense that areas will be “lock up”. If the intention is to work with landowners as signalled in method 4 the use the term “managed” is more appropriate.</p>	<p>Amend Policy 2) and 3) as follows:</p> <p>2) Areas or habitats are considered to be significant if they meet one or more of the criteria in (a) – (e) above.</p> <p>3) Areas identified as significant through (1) and (2) above will be managed to ensure no net loss of biodiversity or biodiversity values as a result of land use actives.</p>
Policy 9.3.2 Methods	<p>Method (4) to (9) and use of “should”</p> <p>Support the emphasis on “<i>Continue to work with landowner</i>” however support is not given to the concept of identifying locations within district plans. It is considered to do so may undermine current working relationships with landowners. The use of the term “should” is therefore supported.</p>	Retain “Should” and policies (4) to (9)
Policy 9.3.2 – Priorities for protection	Support is given to the use of the term “should” in methods (2) to (6)	Retain “Should” as the appropriate way to implement method (2) to (6).
Policy 9.3.6 – Limitation on the use of biodiversity offsets	Support is given to the refinement of the policy since the draft CRPS. The policy could be further strengthened by rewording clause (4) to ensure offset are not seen as short term solutions.	Delete “there is a strong likelihood that” from Policy 9.3.6(4).
Chapter 10	KDC supports in part Chapter 10. KDC would like the	Retain Chapter 10 with amendments as

Beds of rivers and lakes and their riparian zones	following amendments to Chapter 10:	follows:
Policy 10.3.1 Method 6	There are limited opportunities for subdivision within the beds and lakes and rivers, the subdivision, use, development and protection of riparian zones is already provided for by Method 4, so method 6 is redundant	Delete Method 6
Policy 10.3.2 Method 4	Territorial authorities do not have powers to set out objectives, policies or methods in district plans to protect land in riparian zones for protecting indigenous biodiversity and preserving natural character. Territorial authorities have methods in regard to esplanade reserves as outlined in Part 10 of the Act. The method infers powers on territorial authorities that don't exist under the Act.	Amend Method 4
Chapter 11 Natural hazards	KDC supports in part Chapter 11. KDC would like the following amendments to Chapter 11:	Retain Chapter 11 with amendments as follows:
General submission on whole chapter	Support is given to the use of the term "known high hazard areas" in relation to territorial authorities; as opposed to "high hazard areas" Many areas in the Clarence are believed to flood however the level or data on flooding is unknown. To supply such data could be very costly for both the regional council and territorial authorities.	Retain the term "known high hazard areas" and define this term as: Known high hazard areas are an areas of land identified and mapped by the regional council to be subject to (list possible hazards).
Policy 11.3.8	11.3.8(1) which requires Council to "take into account" current projections on the effects of climate change. However, climate change effects are unknown and monitoring and reporting may be required to ascertain climate change effects and environmental outcomes sought from RPS policies. Projections may change with time and methods should reflect this.	Amend methods in accordance with Ministry for the Environment <i>Preparing for Climate Change – A guide for local government in New Zealand</i> . July 2008 or updates The Regional Council Will <ol style="list-style-type: none"> (1) promote public education as a method of response to climate change and its effects (2) Monitor the effects of climate change

Policy 11.3.1 Method (6) & (5)	Both Methods incomplete Numbering is erroneous	Complete methods Fix numbering
Policy 11.3.2 Method 6	Method 6 is not feasible in that a known flooding risk cannot be included in a District Plan unless there is sufficient evidence of that flooding risk. The method then requires the rules to be in a District Plan to require determination of that flooding risk. The method cannot be implemented in its current form.	Reword method
Policy 11.3.3 and Methods	<p>Policy 11.3.3 as worded is not directly seeking to avoid the risk from earthquake hazard. While some areas are subject to liquefaction and lateral spreading, other areas are located adjacent to active fault traces and the risk from earthquake hazard is increased in the vicinity and cannot be managed but must be avoided to reduce risk from effects. Methods 4-6 require research and investigation to be carried out to implement the methods. The burden is on the territorial authority to fund this research to enable these areas to be identified while the Regional Council simply has to assist territorial authorities to delineate areas susceptible to liquefaction and lateral spreading or to delineate fault avoidance zones. It is appropriate that the Canterbury Regional Council provide information on known active earthquake fault trace, areas susceptible to liquefaction and lateral spreading. TA's should capture information in relation to active earthquake fault trace, areas susceptible to liquefaction and lateral spreading at the time of subdivision by way of Section 106 and supply this information to the Regional Council.</p> <p>For known active earthquake fault trace, areas susceptible to liquefaction and lateral spreading TA's will set out objectives, policies, or methods in District Plans to avoid new use and development.</p> <p>Methods 4 and 5 should seek avoidance of areas subject to earthquake risk. Method 6 is unnecessary.</p>	<p>Reword methods to say the Canterbury Regional Council will</p> <ol style="list-style-type: none"> (1) Provide information it holds on active earthquake fault traces. (2) Provide territorial authorities with information it holds on liquefaction and lateral spreading. <p>Reword policy to be specific and directive for the avoidance of earthquake risk. Amend method (4) and (5) to avoid development in areas that are subject to liquefaction and lateral spreading, other areas are located adjacent to active fault traces. Delete Method (6) New method: Territorial authorities to supply information to the Regional Council captured at time of subdivision in relation to active earthquake fault trace, areas susceptible to liquefaction and lateral spreading.</p>

Policy 11.3.3 Principal reason and explanation	Paragraph 1 states that most active fault traces in Canterbury are in sparsely populated mountainous areas...This is untrue for the Kaikoura District.	Reword Principal reason and explanation
Chapter 12 Landscape	KDC supports in part Chapter 12. KDC would like the following amendments to Chapter 12:	Retain Chapter 12 with amendments as follows:
Chapter 12 – General Comment	We are well aware that landscape matters are very complex. We accept that although the landscape has not physically changed, the criteria for assessing the landscape has changed, and as such we will need to review our district landscapes. We wish to ensure the move to the new criteria occurs as smoothly as possible with the highest benefit and least cost to our district.	
Objective 12.2.1 - Identification and protection of outstanding natural features and landscapes	Support to the statement in the principle reasons and explanation that “landscape related management methods are not intended to be prohibitive with respect to land-use change”.	Retain the statement “landscape related management methods are not intended to be prohibitive with respect to land-use change”
Policy 12.3.1 - Identification of outstanding natural features and landscapes	<p>The policy requires recognition of values as opposed to requiring mapping based on the Canterbury Regional Landscape Study Review (CRLSR). The CRLSR is of a broad scale and has been rightly adopted as a technical document to provide guidance. The document is not of a scale to allow information to be directly copied into district plans therefore each TA has the ability to refine landscape areas. Such an approach is important to Kaikoura District Council as it provides flexibility to the final location of landscape overlays.</p> <p>Method (4)(d) requires having regard to “geopreservation sites” however this is a technical term which is undefined. The Canterbury Regional Council Landscape Study Review includes geopreservation. Method 4(d) unnecessarily duplicates this assessment and elevates the term geopreservation sites, this is unnecessary.</p>	<p>Retain the non-mapping based approach at the CRPS level.</p> <p>Remove method 4(d) which relates to “geopreservation sites”</p>

Policy 12.3.2. – Management methods for outstanding natural features and landscapes. Methods	Support is given to the non-mandatory method under “Local authorities”	Retain the use of “May”
Policy 12.3.3 – Protection of other important landscapes. Methods	Support is given to the non-mandatory method under “Local authorities”	Retain the use of “May”
Chapter 13 Historic Heritage	KDC supports in part Chapter 13. KDC would like the following amendments to Chapter 13:	Retain Chapter 13 with amendments as follows:
Chapter 13	The use of the term “landscape” creates confusion with Chapter 12. The Canterbury Regional Landscape Study Review (CRLSR) makes an assessment of historic heritage. Landscape relates to large area with specific aesthetics. However historic heritage relates more to “sites places and areas”.	Throughout Chapter 13 replace the term “landscape” with “Site, Place and Area”
Chapter 14 Air quality	KDC supports in part Chapter 14. KDC would like the following amendments to Chapter 14:	Retain Chapter 14 with amendments as follows:
Policy 14.3.2 Method 4(b)	Kaikoura District Council is concerned that Policy 14.3.2 Method 4(b) uses the term urban settlement which is not defined elsewhere in the document.	Reword Method 4(b)
Policy 14.3.5 Method 6	Method is beyond the control of the territorial authority. Territorial authorities can land use plan in so far as locating industrial and business activities in certain areas, but some activities with air discharges would not require consent from the territorial authority and thus it would be impossible to control the location of such activities.	Reword Method
Chapter 15 Soils	KDC supports in part Chapter 15. KDC would like the following amendments to Chapter 15:	Retain Chapter 15 with amendments as follows:

Policy 15.3.1 Method 6	Method 6 seeks territorial authorities to control land use changes in rural areas. There are many land use changes that can occur as part of permitted rural use that are not sought to be controlled. When reading the policy along with the principal reasons and explanation, it seems that the method is trying to impose land use controls for permitted activities through any land use changes. The policy would be better trying to promote land use practices that support soil quality, retention of soil and avoid long term effects on soil degradation.	Reword policy. Reword Method as follows: <i>To better reflect responsible land use practices. Set out objectives, policies and methods which promote land use practices that support soil quality, retention of soil and avoid long term effects on soil degradation.</i>
Chapter 16 Energy	KDC supports in part Chapter 16. KDC would like the following amendments to Chapter 16:	Retain Chapter 16 with amendments as follows:
Objective 16.2.1 – Efficient use of energy	The policies which implement the objective do not include Chapter 16 policies this is inconsistent with other chapters	Include policies from chapter 16 which implement this objective
Objective 16.2.2 – Enable a diverse and secure supply of energy Objective 16.2.2 (3)	The policies which implement the objective do not include Chapter 16 policies this is inconsistent with other chapters Objective 16.2.2 (3) should be split in to two to recognise both improved efficiency and minimising transmission losses. Where possible energy production should be near the source of energy demand.	Include policies from chapter 16 which implement this objective Split 16.2.2 (3) into two parts to read: “improves the efficient end-use of energy” “minimises transmission losses”
Policy 16.3.3 – Benefits of renewable energy generation facilities.	Support policy, this assists in giving effect to the National Policy Statement Renewable Electricity Generation	Retain policy.
Policy 16.3.4 – Reliable and resilient electricity high-voltage network within Canterbury.	Policy 16.3.4(1) uses the term “electricity high-voltage network” where as policies 16.3.4(2) and (3) use the term “national electricity high-voltage network”. Method 16.3.4(3) uses the term “national electricity transmission network” this has not been defined. It is unclear if this includes both lines and substations or both high voltage and low voltage. It may be more appropriate to refer to this as the “National Grid” as defined by the	Provide consistency between in policies 16.3.4(1)-(3) with the use of the term “national electricity high-voltage network” Define “national electricity transmission network”

	National Policy Statement on Electricity Transmission. Or “national electric high voltage network”	
Policy 16.3.5 - Efficient, reliable and resilient electricity generation within Canterbury	Policy 16.3.5(2)(b) and (c) need to be merged	Merge Policy 16.3.5(2)(b) and (c).
Chapter 17 Contaminated Land	KDC supports Chapter 17.	Retain Chapter 17
Chapter 18 Hazardous substances	KDC supports in part Chapter 18. KDC would like the following amendments to Chapter 18:	Retain Chapter 18 with amendments as follows:
Policy 18.3.1 Method 2	Support for Policy but method outlines District plans to set out objectives, policies or methods for locations that are principally under the control of Regional Councils. Subsection 18.3.1.(5) is the only area that could be controlled in district plans. Transportation of hazardous substances is dealt with in Policy 18.3.2.	Reword Method 2 to state <i>Set out objectives, policies or methods in district plans to avoid actual or potential effects of the use, storage, transport or disposal of hazardous substances in the locations identified in Policy 18.3.1 (5).</i>
Chapter 19 Waste minimisation and management	KDC supports in part Chapter 19. KDC would like the following amendments to Chapter 19:	Retain Chapter 19 with amendments as follows:
Policy 19.3.1 Method 6	Waste management is now able to be addressed through a Waste Management Plan and Bylaws under the Waste Management and Minimisation Act. It is an unnecessary burden to duplicate these provisions in a District Plan.	Reword method that <i>territorial authorities should advocate and encourage activities specifically seeking to reduce the potential waste generated as a result of the use of land.</i>
Policy 19.3.4 Method 3	Method 3 is set out as mandatory. For small communities, such as Kaikoura, waste transfer facilities are adequate to meet the needs of future growth and the cost burden of setting out objectives, policies or methods in district plans to enable the establishment of waste transfer facilities in appropriate location is unnecessary.	Method 3 to be changed to <i>Should.</i>
Glossary and Definitions		
Rural Residential	The current definition of rural residential is woolly.	Consequential amendment to remove definition
Urban (in the Wider Region)	The definition links residential commercial and industrial activities to towns and villages which are predominantly	Define non-agricultural and non-rural in nature.

	non-agricultural or non-rural. For Kaikoura District Town such as: Clarence, Kekerengu would no be urban areas, where as Kaikoura which depends on tourism would be.	
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