

Plan Change 33 Flood Hazard – Summary of Submissions

Submitter Name: Chorus New Zealand Limited (Chorus)

Submission Number: 1.1c33

Summary:

Plan Change 33 unclear and unworkable in that:

- a. is it not clear how parts of the definition of critical infrastructure relates to associated lines, above or below ground, nor how new buildings and structures associated with telecommunications relate to the land use Rules,
- b. some references to rules that do not appear in the text, and
- c. Error indicating that provisions under Rule RX4, are Discretionary Activities, where the Rule is intended for Non-Complying Activities.

The Plan change is also unreasonably restrictive in the way it manages telecommunication and radio communication facilities.

Decision Sought:

Amend the definition of Critical Infrastructure to include all telecommunications and include these as Permitted Activities.

Amend Discretionary rule to specifically include telecommunications as critical infrastructure.

Make it clear that provisions for minimum freeboard and new buildings and structures do not apply to telecommunications infrastructure.

Correct referencing errors

Submitter Name: KiwiRail Holdings Limited (KiwiRail)

Submission Number: 2.1.c33

Summary:

The submitter notes that there are discrepancies between S.32 version and Strikethrough version of Plan Change 33 (Flood Hazard), that the provisions provide no benefit to KiwiRail's level of service in a 200 year event, and that the provisions are unreasonable restrictive.

Decision Sought:

The submitter seeks the following:

- a. Clarification on which provision are intended to apply (S.32 or strikethrough);
- b. Replace 'AND', with 'OR' in the strikethrough version PX5;
- c. Remove the requirement for consent for upgrades to rail infrastructure outside the Designation (D204);
- d. Provide for new critical infrastructure as Restricted Discretionary Activities;
- e. Ensure maps are labelled correctly and are easy to read.
- f. More permissive and easier to interpret

Submitter Name: Wanganui District Council

Submission Number: 3.1.c33

Summary:

The provisions could imply that critical and non-critical infrastructure are regulated as 'buildings and structure', therefore regulating twice. Typographical error in RX4 referring to 'discretionary activities'. Improve clarity regarding earthworks. Improve the clarity in the definition of 'Building maintenance and minor works'.

Decision Sought:

Exclude critical and non-critical infrastructure from the provisions in RX2, replace 'discretionary' with 'non-complying' in RX4, separate earthworks provisions from RX5, clarify the provisions in the definition of 'Building maintenance and minor works'.

Submitter Name: Horizons Regional Council

Submission Number: 4.1.c33

Summary:

Submitter states that the Plan Change should refer to infrastructure throughout the policy stream (Issues, Objectives Policies ect) to reflect One Plan provisions. In addition, improve the clarity of provisions to;

- a. identify the names of the 'Riverfront Zones' in relevant provisions and exclude these zones where provisions are not intended to apply.
- b. articulate the intent of PX4 (avoidance of Subdivision) and RX5.
- c. ensure the definition of resilient building methods is related to Performance Standard 8.8.1.
- d. identify the relevant Performance Standards in the Permitted Activity rule RX1.
- e. identify that the One Plan requires consideration of resilient building techniques only after suitable floor heights and freeboard has been provided for.
- f. Notes the typographical error in RX4.
- g. Better align the definition of safe access with the One Plan. Better identify Flood Area A and B on the Planning maps and improve their definition.

Decision Sought:

The submitter seeks the following:

- a. The word 'infrastructure' included in IX1 and OX2, and any other location in the Plan Change in line with the One Plan.
- b. The words 'Arts and Commerce Zone and Riverfront Zone' to replace any references in the Plan Change to 'the Riverfront Zones'.
- c. Amend 8.3.10, and PX4 to improve clarity around the policy intent.
- d. Amend to be more explicit which Rules do and don't apply to the Arts and Commerce Zone and Riverfront Zone'
- e. Amend 8.8.1 to use improve policy intent and to use the term 'resilient building methods'

- f. Amend to be more explicit which performance standards are being referred to in RX1.
- g. Amend RX2 to illustrate that the minimum floor height provision is to be achieved before resilient building methods are considered.
- h. Correct typographical; error in RX4.
- i. Amend RX5 to clarify the intent of the provision regarding the diversion of flood flows.
- j. Amend the definition of 'safe access' to better reflect the safe access provisions of the One Plan.
- k. Amend the definition of Flood Risk Area A/B and/or the 100/200 year flood event to provide a description of the areas identified on the planning map.
- l. Define the flood areas on the planning maps more clearly.

For all submission points HRC also seeks:

1. Alternative amendments or relief as may be necessary or appropriate to give effect to the decisions sought; and
2. Any consequential amendments or relief as may be necessary or appropriate to give effect to the decisions sought.

Submitter Name: Powerco Limited

Submission Number: 1.5c33

Summary:

Supports PX1, PX2, PX5

Seeks to ensure existing critical infrastructure within hazards can to be upgraded, and that new non-critical infrastructure is permitted.

Supports the definition of 'Critical infrastructure'.

Refer to 'minor' upgrades in the definition of 'upgrades'.

Decision Sought:

Retain PX1, PX2, PX5

Create a new rule for Permitted Activities to include minor upgrades to critical infrastructure and new or upgraded non-critical infrastructure.

Retain RX3

Retain the definition of Critical infrastructure.

Amend the definition of Upgrades to be 'Minor Upgrading'