

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	Statutory Context /General /General	246.1	Amend	<p>The submitter considers there are three high-level 'areas of concern' with the PDP. Namely: whether the PDP should have been notified at this point in time given district-wide gaps within the PDP and the fact that fundamental strategy work is currently taking place; significant restrictions on heavy, or wet, industrial activities from establishing or operating in the General Industrial Zone (GIZ); and the rezoning of land adjoining Ravensdown's Napier Works from Rural Production Zone (RPROZ) to General Industrial Zone (GIZ).</p> <p>(Refer to original submission for full reasons)</p>	Seeks the amendments requested within the submission points in Attachment A to ensure the PDP provides sustainable management or resources, namely that the city's land resource will achieve the purpose of the RMA; is in accordance with Part 2 and other provisions of the RMA; provides for the social and economic well-being of the city's people and communities; meets the reasonably foreseeable needs of future generations; enables the efficient use and development of Ravensdown's assets and operations; and represents the most appropriate means of exercising Council's functions having regard to the efficiency and effectiveness of the provisions relative to other means.
Ravensdown Limited (Ravensdown)	Description of the District /Ahuriri Napier – our city /	246.2	Support	<p>Supports the PDP Part 1 - Introduction and general Provisions / Introduction / Description of the District / Ahuriri Napier - our city which states that: Napier's largest industry sectors in gross domestic product terms are commercial and business services, wholesale, retail and hospitality services, processing and manufacturing, and health, education, and community services.</p> <p>Ravensdown has its Napier Works and two bulk stores within the city and as such supports the recognition of the wholesale and manufacturing industry sectors.</p>	Retain the seventh paragraph about Napier's largest industry sectors in the Description of the District / Ahuriri Napier - our city in its entirety.
Ravensdown Limited (Ravensdown)	Description of the District /Description of the District /	246.3	Support	<p>The submitter supports the Description of Our Economy in the Description of the District / Ahuriri Napier - our city Section as Ravensdown, given the presence of its Napier Works and two bulk stores within the city, supports the recognition of wholesale and manufacturing industry sectors as being of importance to the city in the PDP.</p>	Retain the first paragraph, under the heading ' Our economy ', which describes Napier's industry sectors, as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions / ACTIVITIES SENSITIVE TO NOISE	246.4	Oppose	<p>Opposes the Definition of 'Activities Sensitive To Noise' given that there are two definitions listing similar but different activities that are likely to be sensitive to noise with a reliance on two differing definitions within different sections of the PDP considered to be problematic. Only one such term should be used throughout the PDP.</p>	<p>Delete the notified definition of 'Activities Sensitive To Noise' as follows:</p> <p>means any dwelling, visitor accommodation, boarding house, marae, papakāinga, integrated residential development, retirement village, supported residential care, care centres, lecture theatres in tertiary education facilities, classrooms in education facilities, and healthcare facilities with an overnight stay facility.</p> <p>AND,</p> <p>Rely on and use the notified definition of 'Noise Sensitive Activities', instead of the 'Activities Sensitive To Noise' definition, throughout the PDP.</p> <p>AND,</p> <p>Consequential amendments throughout the PDP.</p>
Ravensdown Limited (Ravensdown)	Definitions /Definitions / FERTILISER	246.5	Support	<p>Supports the Definition of 'Fertiliser' in the PDP as this is consistent with the National Planning Standards (NPS).</p>	Retain the Definition of 'Fertiliser' as notified.

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Ravensdown Limited (Ravensdown)	Definitions /Definitions /HEAVY INDUSTRY	246.6	Support	Supports the Definition of 'Heavy Industry' as it reflects the general understanding of the nature of heavy industrial activities. The definition is also considered to be generally consistent with the NPS's description of activities that would be present in a Heavy Industrial Zone (where such zones are included in statutory plans) (Section 8 and Table 13 of the NPS).	Retain the definition of 'Heavy Industry' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions / IMPERVIOUS AREA	246.7	Support	Supports the Definition of 'Impervious Area' as accurately reflecting the nature of impervious areas.	Retain the definition of 'Impervious Area' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions /INDUSTRIAL WASTE AND TRADE WASTE	246.8	Support	The submitter supports the definition of 'Industrial Waste and Trade Waste' as the same as that provided in the NPS.	Retain the definition of 'Industrial Waste and Trade Waste' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions /LIGHT INDUSTRIAL ZONE	246.9	Oppose	<p>Opposes the Definition of 'Light Industrial Zone' as the inclusion of this definition is inconsistent with the approach to zone descriptions in the PDP, in that, with the exception of 'Centre Zone', definitions are not included for any of the PDP's other zones. Rather the nature and character of the city's various zones are described in the introduction, as well as objectives and policies, contained in each zone 'chapter' of the PDP.</p> <p>Given the context provided within each zone 'chapter' (including the 'Light Industrial Zone' chapter of the PDP), providing definitions of any zone, including a definition of the 'light industrial zone' is not required.</p> <p>This approach is consistent with the NPS which provide definitions for zones but does provide descriptions for zone names (Section 8 and Table 13 of the NPS). The proposed PDP definition of 'light industrial zone' generally reflects the zone description contained in the NPS.</p>	Delete the notified definition of 'Light Industrial Zone'.
Ravensdown Limited (Ravensdown)	Definitions /Definitions /NOISE SENSITIVE ACTIVITY	246.10	Support	The submitter supports the Definition of 'Noise Sensitive Activity' as the PDP contains definitions for both 'Activities Sensitive To Noise' and 'Noise Sensitive Activities' with these two definitions listing similar but different activities that are likely to be sensitive to noise. Reliance on two differing definitions within different sections of the PDP is considered to be problematic. It is proposed that the PDP continues to rely on the 'Noise Sensitive Activity' definition as notified. This is primarily as this is the definition contained in the Operative Plan and therefore the community will largely be familiar with the implications of this term.	Retain the definition of 'Noise Sensitive Activity' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions / REDEVELOPMENT OF IMPERVIOUS AREA	246.11	Support	Supports the Definition of 'Redevelopment of Impervious Area' as the definition clearly outlines activities that do not constitute redevelopment of impervious areas (i.e., activities that do not result in more stormwater being generated and discharged).	Retain the definition of 'Redevelopment Of Impervious Area' as notified.

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Ravensdown Limited (Ravensdown)	Definitions /Definitions /REVERSE SENSITIVITY	246.12	Support	Supports the Definition of 'Reverse Sensitivity' as for Ravensdown, given the presence of its Napier Works which is a heavy industrial activity appropriately located in an industrial zone, providing for the effective management of reverse sensitivity effects on Ravensdown's lawfully established activities, within the PDP, is important. For this reason, including a definition which effectively describes what reverse sensitivity is, is important.	Retain the definition of 'Reverse Sensitivity' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions / SENSITIVE ACTIVITIES	246.13	Support	Supports the Definition for 'Sensitive Activities' as irrespective of national variability, the PDP's proposed definition effectively reflects the nature of activities that are sensitive to adverse effects associated with other lawful activities located in industrial zones.	Retain the definition of 'Sensitive Activities' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions /SIGNIFICANT HAZARDOUS FACILITIES	246.14	Oppose	Opposes the definition for 'Significant Hazardous Facilities' as given the controls in place under HSNOA and various regulations, there is no need for additional regulatory control on the storage and use of hazardous substances under the PDP. In addition, the proposed PDP definition does not seem to be consistent with the evaluative process required under the Health and Safety at Work (Major Hazard Facilities) Regulations 2016 (MHF) to determine whether or not a facility is a MHF (plus the process for determining lower or upper tier MHFs). For these reasons, the deletion of this definition is requested as well as the deletion of this term from the associated HAZS Section Rules.	Delete the definition of 'Significant Hazardous Facilities' as follows: Means any facility which involves one or more of the following activities: — Manufacturing of hazardous substances (including industries; manufacturing agrochemicals, fertilisers, acids/alkalis or paints); — Oil and gas exploration and extraction facilities; — The storage/use of more than 100,000l of petrol; — The storage/use of more than 50,000l of diesel; — The storage/use of more than 6 tonnes of LPG; — Galvanising plants; — Electroplating and metal treatment facilities; — Tanneries; — Freezing works and rendering plants; — Wastewater treatment plants; — Metal smelting and refining (including battery refining or recycling); — Milk treatment plants; — Fibreglass manufacturing; — Polymer foam manufacturing; — Asphalt/bitumen manufacture or storage; or — Landfills. AND, Consequential amendments throughout the PDP.
Ravensdown Limited (Ravensdown)	Definitions /Definitions / SITE	246.15	Support	Supports the definition of 'Site' as it is the same as that provided in the NPS.	Retain the definition of 'Site' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions /STORMWATER	246.16	Support	Supports the definition of 'Stormwater' as being the same as that provided in the NPS.	Retain the definition of 'Stormwater' as notified.
Ravensdown Limited (Ravensdown)	Definitions /Definitions /SWALE	246.17	Oppose	Opposes the definition for 'Swale' as the proposed definition is problematic, particularly as it infers that a swale equates to the formation of a watercourse (i.e., this could be inferred to mean that a new 'surface water body' has been constructed). The definition is also too simplistic and is not sufficiently nuanced.	Delete the notified definition of 'Swale' as follows: means an area of land that has been shaped to allow a watercourse to form during stormwater collection.

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Ravensdown Limited (Ravensdown)	Definitions /Definitions /WET INDUSTRY	246.18	Oppose	Opposes the proposed PDP definition of a 'Wet Industry' as it is an inaccurate description of so-called wet industries, in that it is not necessary for industrial activities that use process water, such as Ravensdown's Napier Works, to be connected to a trade waste network. While industries that use process water then generally generate wastewater that requires treatment and disposal, for some industries it is feasible and environmentally sustainable for on-site wastewater treatment and disposal to be used (subject to compliance with regional council permitted activity rules or discharge permits). This is the case for Ravensdown's Napier Works. On this basis, the PDP's proposed definition of 'wet industry' is not correct and therefore should be deleted. In addition, there is no need to differentiate between heavy and/or wet industries in the PDP, and that only the term 'heavy industry', based on the PDP definition proposed, should be used throughout the PDP.	Delete the notified definition of 'Wet Industry' as follows: Industry that requires process water and a connection to the trade waste network. AND, Consequential amendments throughout the PDP.
Ravensdown Limited (Ravensdown)	SD - Transport and Infrastructure Provision /Strategic Objectives / SD-TI-O1: Enabling infrastructure	246.19	Support	Supports SD-TI-O1: Enabling infrastructure as Ravensdown relies on the continued effective and efficient operation of Napier's port for the receipt and dispatch of raw materials and manufacturing. For this reason, this objective is supported.	Retain Objective SD-TI-O1 as notified.
Ravensdown Limited (Ravensdown)	SD - Urban Form and Development /Issues / SD-UFD-I4: Constraints on industrial growth	246.20	Oppose	The submitter opposes Issue SD-UFD-I4 in that there are many existing businesses present within Napier City, that have invested significantly into their operations and infrastructure, who need certainty and confidence for their decision making on future operations and investment. It is important to appropriately recognise and provide for the operation, intensification and expansion of existing businesses, including larger-scale industrial activities, within the PDP. Also, not all of the city's existing larger-scale industrial activities need to be able to connect to the city's services.	Amend Issue SD-UFD-I4 as follows: SD-I14: Constraints on industrial growth Napier's limited land area and proximity to the Ahuriri Estuary and coast provide limited opportunities for industrial growth, particularly for industries with potential adverse effects on sensitive receiving environments. <u>Explanation</u> Industrial activities are an important component of Napier's employment portfolio. Due to a range of factors including limited suitable land area, poor ground conditions, and proximity to the Ahuriri estuary and inner harbour, new larger-scale industrial activities are encouraged to locate on more suitable land outside of Napier where appropriate services to support such industry are available. Taking an integrated approach enables appropriate industrial activity to <u>establish, intensify and/or expand</u> be located in Napier where traffic can be managed, suitable infrastructure is available, and the adverse effects can be managed through the resource consent process.
Ravensdown Limited (Ravensdown)	SD - Urban Form and Development /Objectives / SD-UFD-O4: Economic activity	246.21	Support	Supports SD-UFD-O4: Economic activity as providing for the city's economic well-being, by enabling economic activity, and innovation, where activities are appropriately located (i.e., industrial activities within industrial zones), is an appropriate planning approach.	Retain Objective SD-UFD-O4 as notified.

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Ravensdown Limited (Ravensdown)	SD - Urban Form and Development /Objectives / SD-UFD-06: Industrial zones	246.22	Support	The submitter supports SD-UFD-06: Industrial zones as it is agreed that industrial activities and development contribute to the economic well-being of the city and broader region. It is also agreed that industrial development needs to ensure that existing infrastructure is used efficiently, as well as sustainably. However, it is important to recognise that it is not always possible to connect to reticulated infrastructure or networks, nor necessary to do so in relation to managing adverse effects on the environment.	Retain Objective SD-UFD-06 as notified.
Ravensdown Limited (Ravensdown)	SD - Urban Form and Development /Policies / SD-UFD-P3: Greenfield growth	246.23	Amend	Considers SD-UFD-P3: Greenfield growth should be amended as the requirement, under this policy, to avoid highly productive soils, in relation to any future expansion of urban limits, is not entirely consistent with the framework now in place under the National Policy Statement for Highly Productive Land (NPS-HPL).	Amend Policy SD-UFD-P3 as follows: Ensure that any future expansion of urban limits: a. requires indicative public access routes to be vested in Council as part of any subdivision; b. avoids urban rezoning in areas with ensures that highly productive soils <u>land is protected for use in land-based primary production</u> , and enables the provision of social facilities to meet the diverse demographic and cultural needs of people and communities.
Ravensdown Limited (Ravensdown)	SD - Urban Form and Development /Policies / SD-UFD-P8: Industrial	246.24	Amend	The submitter considers that SD-UFD-P8: Industrial Policy should be amended as the PDP does not propose any Heavy Industry Zones and Clause (c) of this policy should be amended to identify that heavy industry should be located within the GIZ. In addition, as a definition for 'Heavy Industry' is included in the PDP, there is no need to include a description of what heavy industry is within this part of the policy.	Amend Policy SD-UFD-P8 as follows: Achieve Objective SD-UFD-06: Industrial by: enabling light industrial activity that serves the local Napier community throughout the Industrial and Mixed Use a. Zones; b. enabling industrial activity that utilises the locational benefits of the port and airport through provisions of the Industrial Zones, Port Zone and Airport Zone, and c. ensuring that new heavy industry activities that generate air or trade waste discharge are located in a <u>Heavy General</u> Industry Zone.
Ravensdown Limited (Ravensdown)	SW - Stormwater /Objectives / SW-O3: Receiving environment	246.25	Support	Supports Objective SW-O3: Receiving environment as the outcomes sought by this objective, in terms of striving to improve the quality of receiving environments that receive stormwater from the city's reticulated stormwater network, in accordance with the requirements of the Council's comprehensive network discharge consent, are appropriate.	Retain Objective SW-O3 as notified.
Ravensdown Limited (Ravensdown)	SW - Stormwater /Policies / SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network	246.26	Support	Supports Policy SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network as in the context of the risks associated with rainfall, particularly heavy rainfall, requiring rainfall / stormwater attenuation as proposed by this policy is considered appropriate.	Retain Policy SW-P1 as notified in its entirety.
Ravensdown Limited (Ravensdown)	SW - Stormwater /Policies / SW-P2: Stormwater management in greenfield growth areas	246.27	Support	Supports SW-P2: Stormwater management in greenfield growth areas as this policy is likely to apply to stormwater management in the expanded industrial area sought by Ravensdown at Awatoto. It is appropriate as it recognises that onsite, or standalone, stormwater solutions can be established to support further development (Clause (b)(ii) of this Policy).	Retain Policy SW-P2 as notified.

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Ravensdown Limited (Ravensdown)	SW - Stormwater /Policies / SW-P3: Overland flow paths	246.28	Support	Supports Policy SW-P3: Overland flow paths as Overland flow paths are identified in the PDP as being associated with Ravensdown's Awatoto landholdings. In the context of the risks associated with rainfall, particularly heavy rainfall, requiring the maintenance of the capacity of these flow paths to pass stormwater flows safely is a sensible and appropriate approach.	Retain Policy SW-P3 as notified.
Ravensdown Limited (Ravensdown)	SW - Stormwater /Policies / SW-P4: Low impact design	246.29	Amend	Considers Policy SW-P4: Low impact design should be amended as there are two parts of this policy that need to be addressed further, namely Clauses (e) and (f) as discussed below. The policy relates to putting in place at source low-impact design solutions for stormwater. Clause (e), which refers to improving biodiversity and other values, is not consistent with the policy approach (or the structure of the policy). For this reason, this clause of the policy should be deleted. In relation to Clause (f), while supporting the proposed technique of providing for first-flush treatment of stormwater, via natural or engineered methods, the subsequent sole reference to discharging stormwater to a network does not reflect all of the options that available. As recognised by Policy SW-P2, the discharge of stormwater from a standalone system is also an option.	Amend Policy SW-P4 as follows: Where resource consent is required for subdivision, new buildings, and/or multi-unit development, manage stormwater run-off at source and through low-impact design techniques including: a. minimisation of impervious areas; b. retention of natural vegetation and green spaces; c. selection of plant species appropriate for the climate; d. replication of natural processes such as the filtering properties of soils and vegetation; and e. improvement of biodiversity and other values, and treatment of first-flush through natural and/or engineered methods before discharge to the network <u>or from a standalone system</u> .
Ravensdown Limited (Ravensdown)	SW - Stormwater /Policies / SW-P5: Roofs, car parks, and roads	246.30	Support	Supports SW-P5: Roofs, car parks, and roads with an amendment as while supporting this policy, it is considered that the reference to discharging stormwater to a network does not reflect all of the options that are available. As recognised by Policy SW-P2, the discharge of stormwater from a standalone system is also an option.	Amend Policy SW-P5 as follows: Minimise contaminants in stormwater being discharged to the reticulated stormwater network <u>or from standalone systems</u> by: a. requiring inert roofing materials and restricting the use of inert and toxic materials and paints on roofs, and b. requiring treatment of run-off from new large-scale open car parks and roads designed to accommodate high volumes of traffic.
Ravensdown Limited (Ravensdown)	SW - Stormwater /Policies / SW-P6: Operation and maintenance	246.31	Support	The submitter supports Policy SW-P6: Operation and maintenance as it is agreed that where stormwater management methods are present within a site, they should be maintained and operational at all times, as required by this Policy.	Retain Policy SW-P6 as notified.
Ravensdown Limited (Ravensdown)	SW - Stormwater /SW - Stormwater - Rules Table / SW-R3: Buildings, structures, and earthworks on sites with overland flow paths	246.32	Support	Supports SW - Stormwater - Rules Table Rule SW-R3: Buildings, structures, and earthworks on sites with overland flow paths as Overland flow paths are identified on the PDP's planning maps as being present on Ravensdown's landholdings at Awatoto. In this context, providing for development where overland flow paths are located as a permitted activity, subject to complying with the conditions proposed, is appropriate.	Retain Rule SW-R3 in its entirety as notified.
Ravensdown Limited (Ravensdown)	SW - Stormwater /SW - Stormwater - Rules Table / SW-R4: New buildings or any alteration to buildings	246.33	Support	Supports Rule SW-R4: New buildings or any alteration to buildings as these provisions are an appropriate matter to consider when new buildings are being constructed or when existing buildings are being altered.	Retain Rule SW-R4 as notified.

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Ravensdown Limited (Ravensdown)	SW - Stormwater /SW - Stormwater - Rules Table / SW-R5: Any development of new or redevelopment of existing impervious areas	246.34	Support	Supports SW-R5: Any development of new or redevelopment of existing impervious areas as this Rule framework is supported, particularly given the definition of 'redevelopment of impervious areas', which clarifies that redevelopment of such areas includes the replacement or reconstruction of a site's lawfully established impervious area provided there is no increase in area, no additional contaminants or the re-redirecting of existing stormwater flows or drainage networks.	Retain Rule SW-R5 as notified.
Ravensdown Limited (Ravensdown)	SW - Stormwater /SW - Stormwater - Standards Table / SW-S1: Hydraulic mitigation	246.35	Support	Supports SW - Stormwater - Standards Table Standard SW-S1: Hydraulic mitigation as in relation to Rule SW-R5, this standard and the associated rule framework are supported.	Retain Standard SW-S1 as notified.
Ravensdown Limited (Ravensdown)	SW - Stormwater /SW - Stormwater - Standards Table / SW-S2: Inert roofing	246.36	Support	Supports Standard SW-S2: Inert roofing as discussed above in relation to Rule SW-R4, this standard is supported.	Retain Standard SW-S2 as notified.
Ravensdown Limited (Ravensdown)	TPT - Transport /Objectives / TPT-O2: Economic wellbeing	246.37	Support	Supports Objective TPT-O2: Economic wellbeing as Ravensdown receives and dispatches various products through the port. Therefore, a safe and efficient transport network that provides for efficient freight movement is important.	Retain Objective TPT-O2 as notified.
Ravensdown Limited (Ravensdown)	TPT - Transport /Policies / TPT-P3: Freight access routes	246.38	Support	Supports Policy TPT-P3: Freight access routes for the reasons outlined above in relation to Objective TPT-O2, this policy is also supported.	Retain Policy TPT-P3 as notified.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Issues / HAZS-I1: Adverse effects on the natural environment and the community	246.39	Amend	The submitter considers HAZS-I1: Adverse effects on the natural environment and the community should be amended as the deletion of the proposed definition for 'Significant Hazardous Facilities' has been requested and therefore, as a consequential amendment the removal of this term, or rather the term 'Major Hazardous Facilities', from within this issue is required. In making the above request, it is noted that the PDP seems to be using the terms 'Significant Hazardous Facility' and 'Major Hazardous Facility' interchangeably, and therefore incorrectly, as the PDP, as notified only proposed a definition for 'Significant Hazardous Facility'.	Amend Issue HAZS-I1 as follows: Hazardous substances are used in a wide range of activities occurring within Napier city, from dry-cleaning clothes and manufacturing industrial products to controlling pests and plant diseases in the agricultural sector. Although necessary to provide for the many functions of a city, the use of hazardous substances creates the potential for adverse effects on human health, property, or the natural environment. Activities that use and storage of hazardous substances, and major hazardous facilities must be located in appropriate areas and managed in an appropriate manner to avoid or minimise their effects on sensitive environments.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Issues / HAZS-I2: Adverse effects of hazardous substances on sensitive environments	246.40	Oppose	Opposes HAZS - Hazardous substances Issues HAZS-I2: Adverse effects of hazardous substances on sensitive environments as it largely repeats the matters outlined in Issue HAZS-I1 in terms of sensitive environments and the need to appropriately managed the storage and use of hazardous substances. In addition, the focus of this issue seems to be related to stormwater discharges into these sensitive environments. Issues addressed with stormwater discharges should be addressed within the 'SW – Stormwater' section of the PDP.	Delete Issue HAZS-I2 in its entirety as follows: Approximately 70% of Napier's stormwater is eventually discharged into Te Whanga (the Ahuriri estuary), while the remainder is discharged to the sea, both of which are considered sensitive environments. Activities that use and store hazardous substances, particularly major hazard facilities, have a risk of contaminating these environments if not properly managed.
Ravensdown Limited (Ravensdown)	Definitions /Definitions / PORT RELATED ACTIVITIES	246.41	Support	Supports the definition of 'Port Related Activities' as Ravensdown operates a bulk store at Napier Port and its operations at the port are appropriately accommodated within the definition. Therefore, the proposed definition is supported.	Retain the definition of 'Port Related Activities', including clauses (c) and (f) of the definition, as notified.

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Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Issues / HAZS-I3: Protection from residual effects and risks beyond the site boundary	246.42	Amend	Considers Issue HAZS-I3: Protection from residual effects and risks beyond the site boundary should be amended as the deletion of the proposed definition for 'Significant Hazardous Facilities' has been requested, and therefore, as a consequential amendment the removal of this term, as well as the term 'Major Hazardous Facilities', from within this issue is also required. In addition, as noted above in relation to Issue HAZS-I1, the PDP seems to be using the terms 'Significant Hazardous Facility' and 'Major Hazardous Facility' interchangeably, and therefore incorrectly, as the PDP, as notified only proposed a definition for 'Significant Hazardous Facility'.	Amend Issue HAZS-I3 as follows: Not all activities that store and use hazardous substances significant hazard facilities can contain their adverse effects and risks within their site boundaries. Where residual risks remain on nearby properties, a change in use or intensification of sensitive activities may result in this risk becoming unacceptable or these sensitive activities impacting on the ability of major hazardous <u>these</u> facilities to operate.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Objectives / HAZS-O1: Adverse effects on the natural environment and the community	246.43	Support	Supports Objective HAZS-O1: Adverse effects on the natural environment and the community as it is agreed that the storage and use of hazardous substances, has the potential, if not appropriately controlled and managed, to adversely affect the environment and the community. For this reason, this objective is supported.	Retain Objective HAZS-O1 as notified.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Objectives / HAZS-O2: Enable activities that use and store hazardous substances in appropriate locations	246.44	Amend	The submitter considers that Objective HAZS-O2: Enable activities that use and store hazardous substances in appropriate locations should be amended as Ravensdown's three sites in the city, store and use hazardous substances. Therefore, ensuring that industrial activities are appropriately located within industrial zones, and that the storage and use of hazardous substances in these zones are managed and controlled in accordance with the requirements of HSNOA and its various regulations, is an appropriate land use planning approach. For this reason, this objective is supported. However, the deletion of the proposed definition for 'Significant Hazardous Facilities' has been requested, and therefore, as a consequential amendment - the removal of this term, as well as the term 'Major Hazardous Facilities', from within this objective is also required.	Amend Objective HAZS-O2 as follows: Enable activities that use and store hazardous substances, including major hazard facilities , in appropriate locations where effects on the natural environment and community can be avoided or mitigated.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Objectives / HAZS-O3: Risk and reverse sensitivity effects	246.45	Amend	Considers that Objective HAZS-O3: Risk and reverse sensitivity effects should be amended as the deletion of the proposed definition for 'Significant Hazardous Facilities' has been requested, and therefore, as a consequential amendment the removal of this term from within this Objective is also required.	Amend Objective HAZS-O3 as follows: Sensitive activities are located so that any reverse sensitivity effects and risks associated with established significant hazard facilities <u>activities that store and use hazardous substances</u> are avoided.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Objectives / HAZS-O4: Cumulative effects	246.46	Oppose	Opposes Objective HAZS-O4: Cumulative effects for the same reasons as outlined above in relation to Issue HAZS-I4 and given the requested deletion of Issue HAZS-I4, the deletion of this objective is also necessary.	Delete Objective HAZS-O4 in its entirety as follows: Hazardous substances within significant hazard facilities are used and/or stored in such a way that the risk of these substances mixing, either within the site or from nearby major hazard facilities, is minimised.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Policies / HAZS-P1: Adverse effects of hazardous substances on sensitive environments	246.47	Support	Supports Policy HAZS-P1: Adverse effects of hazardous substances on sensitive environments as given that the Natural Open Space Zones are associated with identified sensitive environments, this Policy is supported.	Retain Policy HAZS-P1 as notified.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Policies / HAZS-P2: Enable activities that utilise hazardous substances in appropriate locations	246.48	Amend	The submitter considers that Policy HAZS-P2: Enable activities that utilise hazardous substances in appropriate locations should be amended as the deletion of the proposed definition for ‘Significant Hazardous Facilities’ has been requested, and therefore as a consequential amendment the removal of this term from within this particular Policy is also required.	Amend Policy HAZS-P2 as follows: Ensure that significant hazard facilities <u>that store and use hazardous substances</u> are appropriately located and controlled in order to reduce risks to the environment and community.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Issues / HAZS-I4: Cumulative effects of major hazard facilities	246.49	Oppose	Opposes Issue HAZS-I4: Cumulative effects of major hazard facilities as natural hazard and zoning issues should be traversed in other relevant chapters of the PDP, and as Issue HAZS-I1 traverses the need for appropriate management and control of hazardous substances, this issue is out of place and thus not needed and should be deleted.	Delete Issue HAZS-I4 in its entirety as follows: Napier's geographic and zoning constraints in relation to industrial activities may result in multiple major hazard facilities located in close proximity to one another. In these circumstances, any natural or human created hazard event may result in hazardous substances used and/or stored within these facilities mixing, which may cause unanticipated significant hazards to the environment, to property, and to the community.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Policies / HAZS-P3: Risk and reverse sensitivity effects	246.50	Amend	The submitter considers HAZS-P3: Risk and sensitivity effects should be amended as zone provisions, particularly for industrial activities appropriately located in industrial zones, should be in place to ensure that sensitive activities are managed to ensure that they do not give rise to reverse sensitivity effects on industrial activities in industrial zones. For this reason, rules in this chapter of the PDP in response to this policy are not necessary. In addition, the deletion of the proposed definition for ‘Significant Hazardous Facilities’ has been requested and therefore as a consequential amendment the removal of this term from within this Policy is also required.	Amend Policy HAZS-P3 as follows: Avoid sensitive activities locating in proximity to major hazard facilities <u>appropriate located activities that store and use hazardous substances</u> , to ensure that any reverse sensitivity effects and residual risks are controlled.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /Policies / HAZS-P4: Cumulative effects	246.51	Oppose	Opposes Policy HAZS-P4: Cumulative effects as for the same reasons as outlined in relation to Issue HAZS-I4 and Objective HAZS-O4, and given the requested deletion of Issue HAZS-I4 and Objective HAZS-O4, the deletion of this Policy is also required.	Delete Policy HAZS-P4 in its entirety as follows: Identify, assess, and manage cumulative effects of significant hazard facilities so they do not increase to unacceptable levels of risk to people, property, and the environment.
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /HAZS - Hazardous Substances - Rules Table /	246.52	Amend	The submitter considers that HAZS - Hazardous Substances - Rules Table should be amended as the introduction to the rule table identifies that the storage and use of hazardous substances must also comply with two of Councils’ bylaws and the ‘Code of Practice for Land Development and Subdivision Infrastructure’. The identification of other ‘regulations’ that must be complied with is supported. However, in this context, it is considered that this list should also refer to HSNOA and associated regulations. HSNOA and its associated regulation are the primary mechanisms in New Zealand for the management and control of hazardous substance transport, storage and use in New Zealand.	Amend Clause (1) under the heading ‘HAZS – Hazardous Substances – Rules Table’ as follows: 1. Activities must also comply with: a. <u>The Hazardous Substances and New Organisms Act 1996 and associated regulations that apply to the storage and use of hazardous substances.</u> ab. the Napier City ...

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /HAZS - Hazardous Substances - Rules Table / HAZS-R1: The storage, handling, or use of hazardous substances (excepting arsenic (As) and significant hazard facilities) within the Natural Open Space Zone	246.53	Amend	Considers that HAZS-R1: The storage, handling, or use of hazardous substances (excepting arsenic (As) and significant hazard facilities) within the Natural Open Space Zone should be amended as the deletion of the proposed definition for 'significant hazardous facilities' has been requested, and therefore, as a consequential amendment, the removal of this term from within this Rule is also required. In this context, it is also important to acknowledge that large scale activities that store and use hazardous substances are unlikely to be able to establish in the zone given the activity status likely to apply to such activities (i.e., non-complying or prohibited).	Amend Rule HAZS-R1 as follows: HAZS-R1: The storage, handling, or use of hazardous substances (excepting arsenic (As) and significant hazard facilities) within the Natural Open Space Zone. ...
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /HAZS - Hazardous Substances - Rules Table / HAZS-R2: The storage, handling or use of hazardous substances in all other zones (excepting significant hazard facilities)	246.54	Amend	Considers that HAZS-R2: The storage, handling or use of hazardous substances in all other zones (excepting significant hazard facilities) should be amended as given the requested deletion of the proposed definition for 'Significant Hazard Facilities', the removal of the exception for 'Significant Hazard Facilities' from this Rule is also required.	Amend Rule HAZS-R2 as follows: HAZS-R2: The storage, handling or use of hazardous substances in all other zones (excepting significant hazard facilities) Activity Status: Permitted
Ravensdown Limited (Ravensdown)	HAZS - Hazardous substances /HAZS - Hazardous Substances - Rules Table / HAZS-R3: Significant hazard facilities	246.55	Oppose	Opposes Rule HAZS-R3: Significant hazard facilities as given requested changes to permitted activity Rule HAZS-R2 and the requested deletion of the definition for 'Significant Hazard Facilities' requiring resource consents for such facilities is opposed.	Delete Rule HAZS-R3 in its entirety as follows: HAZS-R3: Significant hazard facilities Activity Status: Discretionary
Ravensdown Limited (Ravensdown)	ASW - Activities on the Surface of Water /ASW - Activities on the Surface of Water - Rules Table /General	246.56	Amend	The submitter considers that ASW - Activities on the Surface of Water - Rules Table should be amended as Ravensdown and no doubt a range of other resource users in the broader region, have a range of research and environmental monitoring obligations, generally associated with regional resource consent requirements. In addition, universities also undertake research. Given the PDP's ASW proposed Rule framework, these parties would need to seek a non-complying resource consent, in accordance with Rule ASW-R8, to meet these obligations. These parties would also be prohibited from carrying out scientific research in Te Whanganui-a-Orotū (Ahuriri Estuary) (Rule ASW-R4B). It is considered this rule framework is too restrictive and that a permitted activity rule, given the nature of effects associated with these activities, should be included in the PDP to provide for these activities throughout the city.	Amend the ASW - Activities on the Surface of Water - Rules Table by inserting the following rule: <u>ASW-RX: Non-motorised and motorised environmental monitoring and scientific research activities</u> <u>Activity status: Permitted</u> <u>Where:</u> <u>Any water craft used on Te Whanganui-a-Orotū (Ahuriri Estuary), must not be powered by a motor exceeding ten horsepower.</u>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	ASW - Activities on the Surface of Water /ASW - Activities on the Surface of Water - Rules Table / ASW-R4: The use of motorised craft in Te Whanganui-a-Orotū (Ahuriri Estuary)	246.57	Amend	The submitter considers that Rule ASW-R4: The use of motorised craft in Te Whanganui-a-Orotū (Ahuriri Estuary) should be amended as Rule ASW-R4A permits the use of motorised craft in Te Whanganui-a-Orotū (Ahuriri Estuary) for a range of activities, including environmental monitoring and scientific research provided it is carried out by or for the listed organisations. Where the conditions of this rule cannot be complied, the use of motorised craft on the estuary becomes a prohibited activity (Rule ASW-R4B). For the reasons discussed, it is considered that the new permitted activity rule requested above, more appropriately provides for the monitoring and research needs within the city as a whole. For this reason, changes to Rule ASW-R4A are required (i.e., so the new rule applies to these activities and not Rule ASW-R4A).	Amend Rule ASW-R4 as follows: ASW-R4A Activity Status: Permitted Where: 1. The use of motorised craft may be for one or more of the following purposes: a. emergency purposes. b. water safety training purposes. c. environmental monitoring. d. scientific research, undertaken by or on behalf of: i. Department of Conservation; ii. the HBRC; iii. a territorial authority; iv. a district health board, or v. NIWA or other Crown Research Institute.
Ravensdown Limited (Ravensdown)	EW - Earthworks /Objectives / EW-O1: Environment (soils, ecosystems, waterways)	246.58	Support	Supports EW - Earthworks Objective EW-O1: Environment (soils, ecosystems, waterways) as providing for, or enabling earthworks, given that they are more often than not associated with all development activities is supported. It is also agreed that earthworks should not put at risk the life-supporting capacity soils, nor the health and well-being of ecosystems and waterways.	Retain Objective EW-O1 as notified.
Ravensdown Limited (Ravensdown)	EW - Earthworks /Objectives / EW-O3: Hazards and health and safety	246.59	Support	Supports Objective EW-O3: Hazards and health and safety as it is appropriate to ensure that earthworks do not exacerbate any natural hazard risks or put the health and safety of people and property at risk.	Retain Objective EW-O3 as notified.
Ravensdown Limited (Ravensdown)	EW - Earthworks /Policies / EW-P1: Allow for earthworks	246.60	Support	Supports Policy EW-P1: Allow for earthworks as providing for, or allowing, earthworks provided appropriate controls are in place appropriately avoids unnecessary regulatory control of development activities.	Retain Policy EW-P1 as notified.
Ravensdown Limited (Ravensdown)	EW - Earthworks /Policies / EW-P2: Environment	246.61	Support	Supports EW-P2: Environment as although this policy restates and expands on aspects of Policy EW-P1, it is appropriate to ensure that the potential effects of earthworks are appropriately managed. It is considered that the management mechanisms identified within this policy reflect the matters to be considered when setting regulatory controls for earthworks.	Retain Policy EW-P2 as notified.
Ravensdown Limited (Ravensdown)	EW - Earthworks /Policies / EW-P5: Natural hazards	246.62	Support	Supports EW-P5: Natural hazards as it is appropriate to require earthworks to be designed and carried out in a manner that does not undermine the stability of land, buildings and structures, and does not exacerbate any natural hazard risks.	Retain Policy EW-P5 as notified.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Rules Table / EW-R1: Earthworks for building activities	246.63	Amend	<p>Considers EW- Earthworks Rule EW-R1: Earthworks for building activities should be amended as the volume limits are too restrictive. The volume limit of 100m³ in industrial zones does not reflect the nature of large-scale building development that can establish in the industrial zones (i.e., 100m³ could only provide for a small building of around 10m by 10m, with 1m depth of earthworks for foundations). In addition, the limit does not recognise the controls that will be in place through compliance with the Standards.</p> <p>Given the issues associated with the volume limit that applies to industrial zones and following a review of volume limits in other district plans that have become operative relatively recently, a 2,500m³ volume limit is being requested by Ravensdown. This is consistent with the district level earthworks rules in industrial zones in the Auckland Unitary Plan Operative in part.</p>	Amend Rule EW-R1A by increasing the volume limit, that applies to all industrial zones, from 100m ³ to 2,500m ³ .
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Rules Table / EW-R7: Earthworks not otherwise provided for in this table	246.64	Support	<p>Supports Rule EW-R7: Earthworks not otherwise provided for in the table as providing a permitted activity pathway for all other earthworks, provided the controls contained in the standards are met (subject to the various amendments sought through this submission), is considered appropriate and is consistent with the relevant EW objectives and policies. Restricted discretionary activity is also appropriate in circumstances where the EW standards are not complied with.</p>	Retain Rule EW-R7 as notified.
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Standards Table / EW-S1: Extent of earthworks	246.65	Oppose	<p>The volume limit of 50m³ in industrial zones, which is less than the 100m³ permitted for building activities under Rule EW-R1, does not reflect the nature of land development that can establish in the industrial zones. As an example, 50m³ could only provide for a car park area of around 5m by 10m, with an associated 1m depth of earthworks. In addition, the limit does not recognise the controls that will be in place through compliance with the other EW standards.</p> <p>For these reasons, and consistent with the amended volume limit requested for Rule EW-R1A, a 2,500m³ volume limit is being requested by Ravensdown for this standard.</p>	Amend Standard EW-S1 by increasing the volume limit, that applies to all industrial zones, from 50m ³ per site to 2,500m ³ per site.
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Standards Table / EW-S2: Earthworks - cut and fill	246.66	Support	<p>Supports EW - Earthworks - Standards Table EW-S2: Earthworks - cut and fill as this standard specifies maximum vertical and horizontal cut and fill depth/heights and setbacks. These standards represent appropriate controls on earthworks cut and fill activities and are consistent with relevant EW objectives and policies.</p>	Retain Standard EW-S2 as notified.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Standards Table / EW-S4: Removal off site	246.67	Oppose	Opposes Standard EW-S1 4: Removal off site as discussed above in relation to Rule EW-R1 and Standard EW-S1, as it is considered that this volume is potentially too restrictive. A revised volume limit of 2,500m ³ is requested, as this volume is consistent with the increased volume restrictions requested for Rule EW-R1 and Standard EW-S1. (Inferred relief requested)	Amend Standard EW-S4 by increasing the volume limit, that applies to all industrial zones, from 100m ³ per 12-month period to 2,500m ³ per 12-month period. (Inferred relief requested)
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Standards Table / EW-S5: Control of silt and sediment	246.68	Support	Supports EW - Earthworks Standard EW-S5: Control of silt and sediment as this standard, which applies to all zones, requires control measures to be put in place so silt and sediment does not enter stormwater systems, overland flow paths or roads.This standard represents best practice control measures for earthworks and is therefore supported.	Retain Standard EW-S5 as notified.
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Standards Table / EW-S6: Site reinstatement	246.69	Amend	Considers that Standard EW-S6: Site reinstatement should be amended as the requirement to reinstate the site six-months after commencement, rather than after completion, seems illogical. That is, the earthworks may not have been completed within six-months of the earthworks commencing, particularly for larger-scale developments. On this basis, it is considered that the standard should require reinstatement of earthwork sites within six-months of the completion of the earthworks.	Amend Standard EW-S6 as follows: 1. As soon as practicable, but no later than six months from the commencement <u>after the completion</u> of earthworks: ...
Ravensdown Limited (Ravensdown)	EW - Earthworks /EW - Earthworks - Standards Table / EW-S7: Control of dust	246.7	Support	Supports Standard EW-S7: Control of dust as this standard, which applies to all zones, requires control measures to be put in place to manage and minimise potential dust generation.This standard represents best practice control measures for earthworks and is therefore supported.	Retain Standard EW-S7 as notified in its entirety.
Ravensdown Limited (Ravensdown)	LIGHT - Light /Objectives / LIGHT-O1: Appropriate lighting activities	246.71	Support	Supports Objective LIGHT-O1: Appropriate lighting activities as artificial lighting is necessary for the reasons identified in this objective, including at industrial sites such as Ravensdown's Napier Works which operates 24-hours a day. For this reason, this objective is supported.	Retain Objective LIGHT-O1 as notified.
Ravensdown Limited (Ravensdown)	LIGHT - Light /Objectives / LIGHT-O2: Adverse effects of artificial lighting on the amenity and character of areas	246.72	Support	Supports Light-O2: Adverse effects of artificial lighting on the amenity and character of areas as it is agreed that it is also important that lighting is located, designed and maintained so it does not detract from character and amenity values. For this reason, this objective is supported.	Retain Objective LIGHT-O2 as notified.
Ravensdown Limited (Ravensdown)	LIGHT - Light /Policies / LIGHT-P1: Adverse effects of artificial lighting on the amenity and character of areas	246.73	Amend	Considers that Policy Light-P1: Adverse effects of artificial lighting on the amenity and character of areas should be amended as the policy only refers to lighting needed for operational and functional needs and does not refer to security and safety lighting. Therefore, amendments to the policy are requested to provide for consistency with Objective LIGHT-O1. In addition, allowing for security and safety lighting is important to Ravensdown given that it is required to provide such lighting at its sites.	Amend Policy LIGHT-P1 as follows: Allow an appropriate level of artificial lighting for operational, and functional, <u>security and safety</u> purposes while maintaining the predominant character and amenity of each zone.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	LIGHT - Light /Policies / LIGHT-P2: Adverse effects of artificial lighting	246.74	Support	Supports Policy Light-P2: Adverse effects of artificial lighting as it is considered that the mechanisms identified within this policy reflect the matters to be considered when setting appropriate regulatory controls for artificial lighting.	Retain Policy LIGHT-P2 as notified.
Ravensdown Limited (Ravensdown)	LIGHT - Light /LIGHT - Light - Rules Table / LIGHT-R1: Outdoor lighting	246.75	Support	Supports Light - Rules Table LIGHT-R1: Outdoor lighting as Rule LIGHT-R1A permits artificial lighting provided Standards LIGHT-S1, LIGHT-S2 and Table 1 are complied with, and any support structures comply with yard and height in relation to boundary requirements. Where the requirements of Rule LIGHT-R1A are not complied with, a restricted discretionary land use consent is required (Rule LIGHT-R1B).S subject to the amendments requested to the LIGHT standards below, providing for artificial lighting, as proposed within this rule, is considered appropriate. Restricted discretionary activity is also appropriate in circumstances where the conditions of the permitted activity rule are not complied with.	Retain Rule LIGHT-R1 as notified.
Ravensdown Limited (Ravensdown)	LIGHT - Light /LIGHT - Light - Standards Table / LIGHT-S1: Light spill and lighting design	246.76	Amend	Considers that Light - Standards Table LIGHT-S1: Light spill and lighting design should be amended as this Standard outlines the light spill requirements for all land use in the city, except where the lighting is for the purpose of illuminating the road. Based on Ravensdown’s understanding, these standards seem to reflect standard practice and therefore are generally supported. However, it is considered that an exception, similar to that provided for in relation to illumination of roads, may also be required to accommodate lighting required for health and safety purposes (e.g., warning lights required on tall structures for aircraft safety purposes).	Amend Standard LIGHT-S1 as follows: 1 Light spill conditions for all land uses other than for the purposes of illuminating a road <u>and to meet health and safety requirements:</u> ...
Ravensdown Limited (Ravensdown)	LIGHT - Light /LIGHT - Light - Standards Table / LIGHT-S2: Height of light support structures	246.77	Oppose	Opposes Light-S3 Table 1: Maximum height of light support structures in a zone as Standard LIGHT-S2 requires light support structures to comply with the maximum heights in Table 1 (Condition (1)), while Condition (2) requires support structures to not exceed the Airport Height Control Designation. Table 1 then identifies that the maximum height for such structures in all industrial zones and precincts is 25m. The 25m maximum height limit for light support structures in the GIZ is not supported by Ravensdown as it does not reflect the fact that in the GIZ there is no maximum height limit, except in the Ahuriri GIZ where the height limit is 24m. Light structure height limits should not be inconsistent with the zone height limits in Industrial zones.	Amend LIGHT-S3 Table 1: Maximum height of light support structures in a zone as follows: ... <u>All Industrial Zones and Precincts – Must not exceed 25 in height the zone or precincts’ maximum height limits, and no height limit applies when no maximum height applies in the zone or precinct</u>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	LIGHT - Light /LIGHT - Light - Standards Table / LIGHT-S3 Table 1: Maximum height of light support structures in a zone	246.78	Oppose	Opposes Light-S3: Table 1: Maximum height of light support structures in a zone as Standard LIGHT-S2 requires light support structures to comply with the maximum heights in Table 1 (Condition (1)), while Condition (2) requires support structures to not exceed the Airport Height Control Designation. Table 1 then identifies that the maximum height for such structures in all industrial zones and precincts is 25m. The 25m maximum height limit for light support structures in the GIZ is not supported by Ravensdown as it does not reflect the fact that in the GIZ there is no maximum height limit, except in the Ahuriri GIZ where the height limit is 24m. Light structure height limits should not be inconsistent with the zone height limits in industrial zones.	Amend LIGHT-S3 Table 1: Maximum height of light support structures in a zone as follows: ... All Industrial Zones and Precincts – Must not exceed 25 in height <u>the zone or precincts' maximum height limits, and no height limit applies when no maximum height applies in the zone or precinct.</u>
Ravensdown Limited (Ravensdown)	NOISE - Noise /Objectives / NOISE-O1: Amenity values, health, and wellbeing	246.79	Amend	Considers that Objective Noise-O1: Amenity values, health, and wellbeing should be amended as this objective aims to protect amenity values and people's well-being from adverse noise levels, consistent with the nature of the receiving environment. This objective is generally supported as it reflects the outcomes anticipated from the management of noise under the RMA. However, rather than referring to 'adverse' noise levels, it is understood that the duty to avoid 'unreasonable' noise (section 16 of the RMA). An amendment to the objective to reflect this terminology is therefore proposed.	Amend Objective NOISE-O1 as follows: Amenity values and peoples' health and wellbeing are protected from adverse <u>unreasonable</u> noise-levels, particularly at night, consistent with the anticipated outcomes for the receiving environment.
Ravensdown Limited (Ravensdown)	NOISE - Noise /Objectives / NOISE-O3: Reverse sensitivity	246.80	Support	Supports NOISE-O3: Reverse sensitivity as from Ravensdown's perspective, the continued effective operation of industrial activities, that are appropriately located in industrial zones (which tend to accommodate noisier activities), should not be constrained, or put at risk, by reverse sensitivity effects where more sensitive activities locate within industrial zones, or through the placement of residential zones immediately adjacent to industrial zones.	Retain Objective NOISE-O3 as notified in its entirety.
Ravensdown Limited (Ravensdown)	NOISE - Noise /Policies / NOISE-P1: Amenity values, health, and wellbeing	246.81	Support	Supports Policy NOISE-P1: Amenity values, health and wellbeing as this policy is supported as it is appropriate to control noise levels throughout the city in a manner consistent with the activities provided for within different zones and the level of amenity anticipated. In addition, it is important to manage noise levels at the interface of different zones.	Retain Policy NOISE-P1 as notified.
Ravensdown Limited (Ravensdown)	NOISE - Noise /Policies / NOISE-P2: Noise-sensitive activities	246.82	Support	Supports Policy NOISE-P2: Noise-sensitive activities as it articulates the key requirements for ensuring that the amenity anticipated by sensitive activities are provided for, and that reverse sensitivity effects do not arise for activities appropriately located in appropriate zones (e.g., industrial activities in industrial zones).	Retain Policy NOISE-P3 2 as notified.(Inferred relief requested)

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	NOISE - Noise /NOISE - Noise - Rules Table / NOISE-R1: Noise generation (general)	246.83	Support	Supports NOISE - Rules Table NOISE-R1: Noise generation (general) as Rule NOISE-R1A permits noise generation for all activities, unless Rules NOISE-R2 to NOISE-R8 apply, provided Standards NOISE-S1 and NOISE-S2 are complied with. Where the requirements of the permitted activity rule are not complied with, a restricted discretionary land use consent is required (Rule NOISE-R1B). As Rules NOISE-R2 to NOISE-R8 do not apply to Ravensdown's industrial activities in the city, this Rule does apply. As discussed below in relation to Standard NOISE-S1, the noise limits that apply in the GIZ, seem consistent with the noise limits applied to industrial zones throughout New Zealand. Given this context, the general noise framework provided for by this rule is supported.	Retain Rule NOISE-R1 as notified.
Ravensdown Limited (Ravensdown)	NOISE - Noise /NOISE - Noise - Rules Table / NOISE-R9: Noise sensitive activities in the City Centre Zone, Mixed Use Zone, or Industrial Zone	246.84	Amend	Considers NOISE-R9: Noise sensitive activities in the City Centre Zone, Mixed Use Zone, or Industrial Zone should be amended as while the rule framework of the GIZ chapter of the PDP makes it difficult for noise sensitive activities to establish in the zone (non-complying activity, under Rule GIZ-R7, for activities not provided for in the GIZ chapter), for the purposes of clearly managing potential reverse sensitivity effects, it is considered that this noise mitigation rule should also apply in industrial zone (as inferred by the rule title).	Amend Rule NOISE-R9 as follows: NOISE-R9A Activity Status: Permitted Where: 1. Any new or altered noise sensitive space of any noise sensitive activity within the City Centre Zone, or Mixed Use Zone or Industrial Zones (Light and General) must be located, designed, or screened by suitable barriers on the property so that the internal noise levels in those rooms do not exceed: ...
Ravensdown Limited (Ravensdown)	NOISE - Noise /NOISE - Noise - Rules Table / NOISE-R20: Activities infringing standards NOISE-S1-S4	246.85	Support	Supports Rule NOISE-R20: Activities infringing standards NOISE-S1-S4 as although this rule possibly does not need to refer to Standards NOISE-S1 and NOISE-S2 (i.e., given that Rule NOISE-R1 applies a restricted discretionary activity status when the standards are not complied with), the rule is supported as it acts as a 'catch-all' rule.	Retain Rule NOISE-R20 as notified.
Ravensdown Limited (Ravensdown)	NOISE - Noise /NOISE - Noise - Standards Table / NOISE-S1: General noise limits	246.86	Support	Supports NOISE - Standards Table NOISE-S1: General noise limits as this standard sets the noise limits for the various zones within the city. The noise limits for the GIZ are 70dB LAeq(15min) all day and 85dB LAFmax between 10pm and 7am. These noise limits, based on Ravensdown's operations throughout New Zealand, seem consistent with the noise limits applied to industrial zones throughout New Zealand. For these reasons, the proposed noise limits are supported.	Retain Standard NOISE-S1 as notified.
Ravensdown Limited (Ravensdown)	SIGN - Signs /SIGN - Signs - Standards Table / SIGN-S3: Sign area	246.87	Support	Supports Signs - Standards Table SIGN-S3: Sign area as it is acknowledged that various SIGN rules (e.g., Rule SIGN-R14 to SIGN-R17), and standards, may apply to any new signage that Ravensdown may intend to put up at its three sites in the city. An important consideration, for Ravensdown, in relation to signage rules is that industrial sites are not restricted, by these rules, from meeting their various health and safety signage obligations under other legislation (i.e., HSNO, Health and Safety at Work Act 2015 etc). For this reason, the fact that this standard specifies that there is no maximum area of signage within industrial zones, is supported.	Retain the no maximum area of signage, for industrial zones, as provided for by Standard SIGN-S3, as notified.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Ravensdown Limited (Ravensdown)	SIGN - Signs /SIGN - Signs - Standards Table / SIGN-S4: Sign illumination	246.88	Support	Supports SIGN-S4: Sign illumination Standard as this Standard outlines a range of requirements for ensuring that signage illumination, including lighting, does not result in light spillage or distraction. The proposed requirements are considered appropriate.	Retain Standard SIGN-S4 as notified.
Ravensdown Limited (Ravensdown)	TEMP - Temporary Activities /Objectives / TEMP-O2: Adverse effects arising from temporary buildings and structures that enable construction	246.89	Support	Supports Objective TEMP-O2: Adverse effects arising from temporary buildings and structures that enable construction as recognising that temporary buildings and structures are associated with construction activities, while ensuring that such buildings and structures are managed so as to minimise effects beyond the construction areas, is an appropriate planning approach.	Retain Objective TEMP-O2 as notified.
Ravensdown Limited (Ravensdown)	TEMP - Temporary Activities /Policies / TEMP-P1: Enabling temporary activities	246.90	Support	Supports Policy TEMP-P1: Enabling temporary activities as providing for, or enabling, construction activities within the city provides for city's ongoing development, redevelopment and thus economic viability and vibrancy.	Retain Policy TEMP-P1 as notified.
Ravensdown Limited (Ravensdown)	TEMP - Temporary Activities /Policies / TEMP-P2: Adverse effects arising from temporary activities	246.91	Support	Supports Policy TEMP-P2: Adverse effects arising from temporary activities as outlined above in relation to Policy TEMP-P1, enabling and providing for construction activities in the city has positive effects of the city. However, it is also acknowledged that it is important that the potential adverse effects associated with construction activities are appropriately managed.	Retain Policy TEMP-P2 as notified.
Ravensdown Limited (Ravensdown)	TEMP - Temporary Activities /TEMP - Temporary Activities - Rules Table / TEMP-R1: Temporary buildings and structures ancillary to construction activity	246.92	Amend	<p>Considers Temporary Activities - Rules Table TEMP-R1A: Temporary buildings and structures ancillary to construction activity should be amended as while the intent of the permitted activity rule restrictions is supported, there are issues with aspects of these restrictions, particularly larger, and thus longer term, construction activities. The issues relate the proposed 50m2 gross floor area restriction and the proposed 12-month permitted activity timeframe for construction activities. In relation to the area restriction under Condition 1(b), it is considered that a total gross floor area of 50m2 for ancillary temporary buildings and structures, particularly for large scale projects, is very small. In addition, the restriction is not required given the complementary restrictions provided in Conditions 1(a) and (c).</p> <p>Condition (2) requires temporary buildings or structures associated with construction activities to be removed, either one month after the completion of the construction activity, or 12 months after they were placed on site, whichever is the lesser. In effect, given that ancillary buildings and structures are often the first things established at a construction site (and the last to be removed), this condition effectively restricts permitted construction activities to 12 months. This timeframe does not reflect the timeframes associated</p>	<p>Amend Rule TEMP-R1A as follows:</p> <p>TEMP-R1A Activity Status: Permitted</p> <p>Where:</p> <ol style="list-style-type: none"> 1. The temporary building or structure: <ol style="list-style-type: none"> a. is for such purposes as a temporary office, storage shed, storage yard, builders' workshop, safety fence, and other similar buildings and uses of land that are incidental to a construction project; b. is no more than 50 m2 in gross floor area, and c. complies with the yards, height, and height in relation to boundary standards in the applicable zone. 2. The temporary building or structure is removed within one month of the completion of the construction project or within 182 months from when it was first placed on the site, whichever is the lesser. 3. The noise and vibration limits in NOISE-R2 – Construction noise and vibration apply.

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				<p>with larger, or more complex construction activities, nor does it accommodate restrictions that may be associated with the colder months of year, or weather slowing down construction activities. For this reason, a longer permitted activity construction period of 18 months is proposed.</p>	
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Introduction /	246.93	Amend	<p>Considers the GIZ - General Industrial Zone Introduction should be amended as the main area of concern is the statements that due to the GIZ areas being located close to sensitive receiving environments, and the limited space available in Napier City to provide for zoning for industrial activities, new and expanded heavy (and wet) industrial activities in the GIZ are to be avoided. The introduction also states these industrial activities are to be directed to Hastings. Avoiding heavy industrial activities in appropriately zoned industrial zones does not reflect a logical resource management approach. The GIZ has been established to provide for industrial activities, including heavy industrial activities, as required by Objective SD-UFD-P8 (subject to the amendments sought above).</p> <p>Providing for heavy industry in GIZ areas, and more specifically providing for, or not restricting, the ability of existing heavy industry, such as Ravensdown’s Napier Works, to continue to expand and/or operate effectively, is what effective and efficient land use planning under the RMA requires.</p>	<p>Amend the fourth and fifth paragraphs of the GIZ - General Industrial Zone Introduction as follows:</p> <p>Infrastructure that is designed to cater for industries that use water and discharge trade waste as part of their manufacturing processes is mainly located in the Pandora part of the General Industrial Zone. Any trade waste associated with the expansion or development of new industrial activities within the zone is to be treated and disposed of in accordance with the Napier City Council Tradewaste and Wastewater Bylaw.</p> <p>There is limited capacity for new or expanded wet heavy industry within the General Industrial Zone. Instead, this wet new heavy industry is directed to Hastings, where there is some capacity for new wet heavy industry.</p> <p><u>In addition, H</u>heavy industrial activities can have significant adverse effects that cannot always be contained on site and are often incompatible with sensitive land uses and ecological areas surrounding <u>located beyond</u> the General Industrial Zone. Larger lot sizes are often needed to accommodate these types of industrial activities in order to internalise their effects. <u>Accordingly, T</u>he expansion of heavy industry is to be avoided <u>managed</u> in the General Industrial Zone due to when the activity is located in the close proximity of receiving environments that are <u>potentially</u> sensitive to the adverse effects that heavy industry generates and the potential contaminant discharges. However, it also needs to be recognised that there is some established heavy industry in the General Industrial Zone where relocation <u>to Hastings</u> is not practical, and some expansion may be appropriate provided that the adverse effects from discharges, traffic, and noise can be maintained at acceptable levels.</p>
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Objectives / GIZ-O1: Enabling industrial activities	246.94	Amend	<p>Considers that Objective GIZ-O1: Enabling industrial activities should be amended as the objective does not provide for the on-going operation and development of industrial activities outside of reticulated areas. This fails to recognise the significant contribution that existing industries make to the city, and the wider region, and the extent of capital investment in buildings and plants associated with existing activities that are present in areas where there is no reticulated servicing. This is of relevance to Ravensdown given that their Napier Works at Awatoto is located outside of a reticulated area and is therefore serviced by on-site means.</p> <p>In addition, remediation or mitigation of adverse effects from appropriately located industrial activities in GIZ areas, on areas with important or significant values, rather than only avoidance of adverse effects, may also be a valid resource management approach. This should be recognised in the objective.</p>	<p>Amend the Objective GIZ-O1 as follows:</p> <p>The General Industrial Zone enables the on-going operation and development of industrial activities where reticulated services are available, and while adverse effects on sites with important or significant values are avoided, <u>remedied or mitigated</u>.</p>

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Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Objectives / GIZ-O2: Non-industrial and ancillary activities	246.95	Support	Supports Objective GIZ-O2: Non-industrial and ancillary activities as only providing for non-industrial activities to establish in the GIZ when they are directly associated with, or ancillary, to the industrial activity taking place at a site, is an appropriate resource management approach. This approach minimises the potential for reverse sensitivity effects to arise within the zone.	Retain Objective GIZ-O2 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Objectives / GIZ-O3: Incompatible activities and reverse sensitivity	246.96	Support	Supports Objective GIZ-O3: Incompatible activities and reverse sensitivity as it is appropriate to avoid the establishment of incompatible and sensitive activities in the GIZ - General Industrial Zone.	Retain Objective GIZ-O3 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Objectives / GIZ-O4: Industrial activities in close proximity to Te Whanganui-a-Orotū (the Ahuriri estuary) or residential zones	246.97	Oppose	Opposes GIZ-O4: Industrial activities in close proximity to Te Whanganui-a-Orotū (the Ahuriri estuary) or residential zones as it is not agreed that industrial activities located appropriately within industrial zones should be required to be managed such that they have 'low impact' on nearby residential activities. Zoning, within the PDP, should have been developed to manage and control reverse sensitivity effects where residential zones adjoin industrial zones.	Amend Objective GIZ-O4 as follows: Objective GIZ-O4: Industrial activities in close proximity to the Te Whanganui-a-Orotū (the Ahuriri estuary) or residential zones Industrial activities near to the Te Whanganui-a-Orotū (the Ahuriri estuary) or residential zones are located, and designed and <u>managed</u> to have a low impact <u>minimise adverse effects</u> on health, safety, cultural and environmental values <u>associated with the estuary</u> .
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies / GIZ-P1: Activities in General Industrial Zone	246.98	Oppose	Opposes Policy GIZ-P1: Activities in General Industrial Zone as the Policy identifies that a level of residential amenity is to be maintained in adjacent areas, assumably irrespective of the zoning of adjacent land, and at levels that recognises the industrial setting. This aspect of the policy is confusing and does not make sense. It is also noted that other policies address issues of off-site effects and amenity expectations for non-industrial zones (for example, GIZ-P4). In addition, zoning, within the PDP, should have been developed to manage and control reverse sensitivity effects where residential zones adjoin industrial zones. For these reasons, this component of the policy is not appropriate and not needed. Rather, it is considered that reference to an obligation for industrial activities in the zone to avoid, remedy or mitigate adverse effects on the surrounding environment is more appropriate. Finally, consistent with the requested amendments to SD-UFD-P8 (above) and the requested deletion of GIZ-P2 (below), providing for the heavy industrial activities in the zone, subject to ensuring that appropriate control and management of the adverse effects associated with such activities, is also requested.	Amend Policy GIZ-P1 as follows: Enable industrial activities, <u>including heavy industrial activities</u> , in the General Industrial Zone, recognising that these activities generate higher levels of light, noise, vibration, odour, and high volumes of traffic, while maintaining residential amenity in adjacent areas at a level that recognises the industrial setting and is reasonable for the location <u>avoiding, remedying or mitigating adverse effects on the surrounding environment</u> .
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies /GIZ-P2: Heavy industrial activities	246.99	Oppose	Opposes GIZ-P2: Heavy industrial activities as this policy is not consistent with Objective GIZ-O2 which aims to enable the on-going operation and development of industrial activities within the zone. In addition, none of the zone of objectives identify that the establishment of heavy industry in the zone is to be avoided.	Delete Policy GIZ-P2 in its entirety as follows: Avoid heavy industrial activities in the General Industrial Zone, and industrial activities that have significant water use or infrastructure requirements (wet industry), unless appropriate services are available and the adverse effects from discharges, odour, traffic, and noise can be maintained at acceptable levels.

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Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies / GIZ-P3: Industrial activities are connected to the reticulated network	246.100	Oppose	Opposes Policy GIZ-P3: Industrial activities are connected to the reticulated network as this policy does not appropriately recognise and provide for existing industries in the zone, or their ongoing operation, intensification or future development outside of reticulated areas. Considers this policy therefore does not recognise that there are a range of approaches that are already, or can be, implemented, including on-site treatment and disposal options, to reduce effects from industrial waste, trade waste or stormwater contamination within sites located outside of reticulated areas.	Amend Policy GIZ-P3 as follows: Require that <u>New</u> industrial activities that generate industrial waste, trade waste and potentially contaminated stormwater are <u>to be</u> located where infrastructure services are in place and have sufficient capacity to support the activities and that the quality of the discharge entering the network meets Councils relevant bylaws. <u>Existing industrial activities are to connect to reticulated servicing networks, where such networks are available, and where these networks are not available, the adverse effects on the surrounding environment of on-site service provision are to be appropriately avoided, remedied or mitigated.</u>
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies / GIZ-P5: Manage industrial activities to avoid adverse effects on water margins and land with sensitive values	246.101	Support	Supports GIZ-P5: Manage industrial activities to avoid adverse effects on water margins and land with sensitive values as it is appropriate to avoid adverse effects on the sensitive environments listed within this policy by adopting the approaches outlined.	Retain Policy GIZ-P5 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies / GIZ-P6: Non-industrial and ancillary activities	246.102	Support	Supports GIZ-P6: Non-industrial and ancillary activities Policy as it is appropriate to avoid the establishment of sensitive and incompatible activities in the zone as outlined in the policy.	Retain Policy GIZ-P6 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies / GIZ-P7: Reverse sensitivity	246.103	Support	Supports GIZ-P7: Reverse sensitivity as it is appropriate to ensure that sensitive activities, that may give rise to reverse sensitivity effects, cannot establish within the zone. While supporting this policy, it is noted that this policy seems to repeat concepts already incorporated into GIZ-P6 (refer to above).	Retain Policy GIZ-P7 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R1: Any industrial activity and any building or structure associated with industrial activities	246.104	Oppose	Opposes GIZ - General Industrial Zone - Rule GIZ-R1: Any industrial activity and any building or structure associated with industrial activities as Ravensdown considers that Condition (1) is too restrictive and that an accommodation should be provided within the condition where the discharge of contaminants is a permitted activity in accordance with a regional plan (i.e., and thus the effects are minor), or where a resource consent authorises the discharge/s. While Ravensdown agrees that new heavy industrial activities should not be provided for as permitted activities under this rule, the rule effectively restricts any development of existing heavy industrial activities in the zone. For example, under this rule, if Ravensdown were to build new storage building at their Napier Works, as currently drafted, a resource consent would be required under Rule GIZ-R9, even if all of the zone standards were complied with. It is considered that Condition (3) should be amended, so that development activities, which do not entail new or expanded manufacturing or processing plants and which are associated with existing heavy industrial activities, can be provided for by this permitted activity rule. Finally, as discussed above in relation to the definition for 'Wet Industry', the deletion of all references to Wet Industrial Activities has been requested. Therefore, a consequential amendment to Condition (3) is required	Amend Rule GIZ-R1A as follows: <i>GIZ-R1A</i> <i>Activity Status: Permitted</i> Where: 1. There are no discharges of contaminants from the site; except: a. through a connection to the Council reticulated networks; <u>or</u> b. where the discharge of contaminants is a permitted activity in accordance with a regional plan; <u>or</u> c. where a resource consent is held for the discharge of contaminants. 2. The goods or services offered must be manufactured, processed, repaired, serviced or warehoused on the site. The activity is not a <u>new</u> Heavy or Wet Industrial Activity <u>or new or expanded manufacturing or processing plants associated with an existing Heavy Industrial Activity</u> (see Rule GIZ-R89).

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Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R2: Office accommodation	246.105	Amend	Considers that Rules GIZ-R3A and GIZ-R3A (GIZ-R3: Retail) should be amended as it is considered that the current drafting does not reflect the intent. For example, heavy industrial activities are not permitted activities in the zone. Secondly, the reasoning behind the gross floor restriction is not understood. Condition (a), subject to the amendments requested, means that any office accommodation must be in support of the primary activity taking place at the site. In this context, as the office accommodation is secondary to the site activity, it is considered that the occupiers of the site are best placed to determine how much office space is required in the context of site operations. In addition, the zone standards place additional restrictions on any site buildings, including office accommodation. Finally, it is considered, given that this rule solely relates to office accommodation associated with industrial activities in the zone, that the activity status, where the permitted activity rules are not complied with, should be restricted discretionary, not discretionary.	Amend Rules GIZ-R2A and GIZ-RB as follows: GIZ-R2A Activity Status: Permitted Where: 1. Any office accommodation: a. relates solely to the administration and management of the site activities an industrial or commercial activity otherwise permitted in the General Industrial Zone, and b. must be limited to 35% of the gross floor area of buildings on the site. GIZ-R2B Activity Status where conditions are not met: <u>Restricted</u> Discretionary
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R3: Retail	246.106	Support	Supports GIZ-R3: Retail Rule and GIZ-R3A as these rules are supported as the Rule permits specific retail activities that can be accommodated in the zone. General retail activities, beyond those permitted by this rule, are more than likely to be incompatible with the zone's industrial activities and therefore a discretionary activity consent pathway for these activities is appropriate.	Retain Rule GIZ-R3: Retail as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R4: Hospitality, food, and beverage services	246.107	Support	Supports Rule GIZ-R4: Hospitality, food, and beverage services including GIZ-R4A as the Rule permits food related services in the zone that meet the needs of the zone's workers. Other food related services, beyond those permitted by this rule, are more than likely to be incompatible with the zone's industrial activities and therefore a discretionary activity consent pathway for these activities is appropriate.	Retain Rule GIZ-R4 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R7: Activities listed in GIZ-R1 to GIZ-R5 infringing standards GRZ-S1 - GRZ-S9	246.108	Amend	The submitter considers that GIZ-R7: Activities listed in GIZ-R1 to GIZ-R5 infringing standards GRZ-S1 - GRZ-S9 should be amended as this Rule requires the specific activities listed in Rules GIZ-R1 to GIZ-R5 to seek a restricted discretionary land use consent, if the activities do not comply with any of the listed standards. However, rather than referring to the GIZ standards, the rule refers to the standards that apply to the General Residential Zone. It is assumed that this is an error.	Amend Rule GIZ-R7 as follows: GIZ-R7: Activities listed in GIZ-R1 to GIZ-R5 infringing standards GRZ-S1 - GRZ-S9 GIZ-S1 to GIZ-S6...
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R8: Land use or development that is not otherwise provided for	246.109	Support	Supports GIZ-R8: Land use or development that is not otherwise provided for as a catch-all Rule.	Retain Rule GIZ-R8 as notified.

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Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules / GIZ-R9: Heavy industrial activities	246.110	Oppose	Opposes GIZ-R9: Heavy industrial activities as Ravensdown considers that providing for heavy industrial activities, including the redevelopment and expansion of existing heavy industrial activities (such as Ravensdown's Napier Works), within the GIZ, subject to appropriate controls, is an appropriate planning approach. That is, industrial zones, should provide for industrial activities, including heavy industrial activities. Therefore, Ravensdown opposes restricting, by way of a non-complying activity status, the ability of heavy industrial activities to be able to establish or continue to operate within the GIZ.	Amend Rule GIZ-R9 as follows: GIZ-R9: <u>New Heavy industrial activities and new or expanded manufacturing or processing plants associated with an existing heavy industrial activities</u> Activity Status: Non-complying <u>Discretionary</u>
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Standards Table / GIZ-S1: Yards	246.111	Support	Supports GIZ - General Industrial Zone - Standards Table GIZ-S1: Yards as this standard specifies setbacks from water (6m), as well as front yard (2, 3 or 6m) and other yard setbacks (2 to 6m with landscaping requirements) where the site adjoins another zone. As a permitted activity standard, these yard requirements are supported.	Retain Standard GIZ-S1 as notified in its entirety.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Standards Table / GIZ-S2: Height	246.112	Support	Supports GIZ-S2: Height as Ravensdown is supportive of there not being a maximum height within the GIZ and the 24m maximum height restrict in the Ahuriri GIZ (unless the Airport Height Control Designation applies).	Retain Standard GIZ-S2: Height as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Standards Table / GIZ-S3: Height in relation to boundary	246.113	Support	Supports Standard GIZ-S3: Height in relation to boundary as this proposed standard is appropriate and is therefore supported.	Retain Standard GIZ-S3 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Standards Table / GIZ-S4: Outdoor storage of materials and products (excluding storage of shipping containers)	246.114	Support	The submitter supports GIZ-S4: Outdoor storage of materials and products (excluding storage of shipping containers) as in the context of new development within the GIZ, the permitted activity management requirements for outdoor storage of materials and products are generally considered appropriate.	Retain Standard GIZ-S4 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Standards Table / GIZ-S6: Stormwater run-off	246.115	Support	Supports GIZ - General Industrial Zone Standard GIZ-S6: Stormwater run-off as Ravensdown considers that in the context of new development within the GIZ, the permitted activity stormwater management requirements are appropriate.	Retain Standard GIZ-S6 as notified.
Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /Policies / GIZ-P4: Effects on the amenity of adjoining non-industrial zones	246.116	Support	Supports Policy GIZ-P4: Effects on the amenity of adjoining non-industrial zones as it outlines sensible mechanisms for ensuring that potential adverse effects on the adjoining more sensitive zones, if such zones adjoin each other, are appropriately managed.	Retain Policy GIZ-P4 as notified.
Ravensdown Limited (Ravensdown)	PORTZ - Port Zone /Objectives / PORTZ-O1: Provide for Napier Port	246.117	Support	Supports PORTZ - Port Zone Objective PORTZ-O1: Provide for Napier Port as Ravensdown's Port Store, which is located in the PORTZ, is a 'port-related activity' (refer earlier submission point) with this objective aiming to enable port activities, while also ensuring that off-site adverse effects are appropriately managed.	Retain Objective PORTZ-O1 as notified.

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Ravensdown Limited (Ravensdown)	PORTZ - Port Zone /Objectives / PORTZ-O2: The efficient and effective use and development of Napier Port	246.118	Support	Supports PORTZ-O2: The efficient and effective use and development of Napier Port as in enabling port and port-related activities to take place within the PORTZ (as provided for by PORTZ-O1), it is important to ensure that these activities are not subject to reverse sensitivity effects from sensitive activities within the zone.	Retain Objective PORTZ-O2 as notified.
Ravensdown Limited (Ravensdown)	PORTZ - Port Zone /PORTZ - Port Zone - Rules Table / PORTZ-R4: Port-related industrial activity, transport, storage, and goods handling	246.119	Support	The submitter supports PORTZ-R4: Port-related industrial activity, transport, storage, and goods handling as Rule PORTZ-R4 provides for 'port-related activities' as a permitted activity, subject to compliance with the PORTZ standards (Rule PORTZ-R4A). Where the PORTZ standards are not complied with, port-related activities require a resource consent as a discretionary activity (Rule PORTZ-R4B). As Ravensdown's Port Store is a 'port-related activity' (refer to above), this 'port-related activity' permitted activity rule is supported.	Retain Rule PORTZ-R4 as notified.
Ravensdown Limited (Ravensdown)	Planning Maps /General /General	246.120	Support	Supports the GIZ - General Industrial Zone over the land at 19 Severn Street, Pandora, Napier 4110 as Ravensdown's Severn Street Store is located at 19 Severn Street. It is located within the Pandora industrial area. This zoning reflects the nature of activities that take place at this site, and the surrounding land. It is also acknowledged that there are a number of other overlays that apply to the site or parts of the site (i.e., liquefaction vulnerability, high land transport noise area and a Statutory Acknowledgement (Area of Interest)).	Retain the GIZ - General Industrial Zone over the land at 19 Severn Street, Pandora, Napier.
Ravensdown Limited (Ravensdown)	Planning Maps /General /General	246.121	Support	Supports retaining the PORTZ - Port Zone on the area associated with the Port of Napier as one of Ravensdown's two stores in the city is located within the area associated with port activities. This zoning reflects the nature of activities that take place at the port. It is also acknowledged that there are a number of other overlays that apply to the port or parts of the port (i.e., liquefaction vulnerability, high land transport noise area and overland flow paths).	Retain the PORTZ - Port Zone on the area associated with the Port of Napier.

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Ravensdown Limited (Ravensdown)	Planning Maps /General /General	246.122	Amend	<p>Considers Ravensdown’s landholding at Awatoto located between the state highway and Waitangi Road that is zoned GIZ - General Industrial should be retained. This zoning reflects the nature of development that is in place and the nature of industrial activities that take place at the Napier Works.</p> <p>Ravensdown also owns two parcels of land which are located to the west of Waitangi Road and thus to the west of the developed part of the Napier Works. The two land parcels, which cover an area of 17.574ha, are legally described as Lot 6 DP 25683 (RT HBV4/1002) and Lot 7 DP 25683 (RT HBV4/1002). As discussed earlier in the submission, rezoning through amendment of this land from Rural Production Zone (RPROZ) to GIZ is requested. As rezoning this land would help to future proof Ravensdown’s operations at Awatoto and give them more confidence for future decisions on their operations and investments in the area, while also providing flexibility around any potential redevelopment that may be undertaken at the Napier Works.</p>	<p>Retain the GIZ - General Industrial Zone over the land associated with Ravensdown’s Napier Works at 90 Waitangi Road, Awatoto</p> <p>AND,</p> <p>Rezone Lot 6 DP 25683 (RT HBV4/1002) and Lot 7 DP 25683 (RT HBV4/1002) from RPROZ - Rural Production Zone to GIZ - General Industrial Zone.</p>
Ravensdown Limited (Ravensdown)	Planning Maps /General /General	246.123	Amend	<p>Considers that at all three of Ravensdown’s sites, the online planning maps, identify the sites as being within the ‘urban limit (main residential)’. While the ‘urban limit’ tag is logical in that industrial and port zoned land does form part of the urban environment (and not part of the rural environment), the sub-grouping of ‘main residential’ seems to be an error (i.e., industrial zoned land cannot be characterised as residential land). Accordingly, amendments are requested, or clarification, on this overlay and its associated sub-grouping descriptor.</p>	<p>Amend the ‘urban limit’ overlay on the planning maps so that the descriptor accurately reflects the underlying zones (i.e., industrial at Ravensdown’s Napier Works and Severn Street Store and port at its Port Store)</p> <p>OR,</p> <p>Delete the ‘main residential’ sub-grouping from the overlay.</p>
Ravensdown Limited (Ravensdown)	Planning Maps /General /General	246.124	Oppose	<p>Opposes the extent of the CE - Coastal Environment that is mapped as the ‘Coastal Environmental Overlay’ in the PDP’s planning maps, with the introduction to the CE chapter of the PDP stating that the overlay recognises “the characteristics and features where coastal processes, influences and qualities are significant”.</p> <p>Part of the CE - Coastal Environmental Overlay traverses GIZ land in Awatoto, including land which forms part of Ravensdown’s Napier Works. It is considered that applying the Coastal Environmental Overlay over industrial zoned land, which is already characterised by industrial activities (i.e., Ravensdown’s Napier Works), is not consistent with the resource management intent for the CE or the GIZ (as reflected in relevant objectives and policies for these environments and zones). For these reasons, the CE - Coastal Environmental Overlay should be removed from GIZ - General Industrial Zone land in Awatoto.</p>	<p>Delete the part of the CE - Coastal Environmental Overlay that traverses the General Industrial Zone at Awatoto.</p>

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Ravensdown Limited (Ravensdown)	GIZ - General Industrial Zone /General /General	246.125	Oppose	The submitter considers there are three high-level 'areas of concern' with the PDP. Namely: whether the PDP should have been notified at this point in time given district-wide gaps within the PDP and the fact that fundamental strategy work is currently taking place; significant restrictions on heavy, or wet, industrial activities from establishing or operating in the General Industrial Zone (GIZ); and the rezoning of land adjoining Ravensdown's Napier Works from Rural Production Zone (RPROZ) to General Industrial Zone (GIZ).(Refer to original submission for full reasons)	Seeks the amendments requested within the submission points in Attachment A to ensure the PDP provides sustainable management or resources, namely that the city's land resource will achieve the purpose of the RMA; is in accordance with Part 2 and other provisions of the RMA; provides for the social and economic well-being of the city's people and communities; meets the reasonably foreseeable needs of future generations; enables the efficient use and development of Ravensdown's assets and operations; and represents the most appropriate means of exercising Council's functions having regard to the efficiency and effectiveness of the provisions relative to other means.