

# Section 32 Report

## Ngā mahi taupua/ Temporary Activities

prepared for the

# Proposed Waimakariri District Plan

18 September 2021



**WAIMAKARIRI**  
DISTRICT COUNCIL

## TABLE OF CONTENTS

<b>1.</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>4</b>
<b>2.</b>	<b>OVERVIEW AND PURPOSE .....</b>	<b>4</b>
2.1	Purpose of Section 32 RMA.....	4
2.2	Topic Description.....	4
2.3	Significance of this Topic.....	5
2.4	Current Objectives, Policies and Methods .....	5
2.5	Information and Analysis .....	5
2.6	Consultation Undertaken.....	6
2.7	Iwi Authority Advice.....	7
2.8	Reference to Other Relevant Evaluations .....	7
<b>3.</b>	<b>STATUTORY AND POLICY CONTEXT .....</b>	<b>7</b>
3.1	Resource Management Act 1991.....	7
3.2	National Instruments .....	8
3.3	Regional policy statement and plans.....	8
3.4	Iwi Management Plan .....	9
3.5	Any relevant management plans and strategies.....	9
3.6	Any other relevant legislation or regulations .....	9
3.7	Any plans of adjacent territorial authorities.....	9
<b>4.</b>	<b>KEY RESOURCE MANAGEMENT ISSUES .....</b>	<b>10</b>
4.1.	Issue 1: Lack of a policy and rule framework to enable and manage temporary activities 10	
4.2	Issue 2: Temporary activities are also controlled through processes outside of the District Plan and duplication of processes should be avoided. ....	10
4.3	Issue 3 – Visual effects from temporary structures .....	11
<b>5.</b>	<b>OVERVIEW OF PROPOSED OBJECTIVES, POLICIES AND METHODS .....</b>	<b>11</b>
5.1	Strategic Direction.....	11
5.2	Zone / District-wide Subject .....	11
5.3	Proposed Objectives and Policies .....	11
5.4	Proposed Methods .....	12
<b>6.</b>	<b>SCALE AND SIGNIFICANCE EVALUATION .....</b>	<b>13</b>

6.1	Evaluation of Scale and Significance.....	14
7.	EVALUATION OF PROPOSED OBJECTIVES.....	16
7.1	Evaluation of Proposed Objectives.....	16
7.2	Summary - Evaluation of Proposed Objectives.....	17
8.	EVALUATION OF PROPOSED POLICIES AND METHODS.....	17
8.1	Evaluation of Proposed Policies and Methods.....	18
8.2	Summary - Evaluation of Proposed Policies and Methods.....	22
9.	SUMMARY.....	22
	Appendix One: Specific Consultation Comments and Response.....	23
	Consultation.....	23

# 1. EXECUTIVE SUMMARY

The chapter for Temporary Activities includes provisions to manage temporary activities, buildings and events, recognising the contribution that these activities can make to the social, economic and cultural wellbeing of the District providing any adverse effects are managed to be compatible with the surrounding area.

The Operative District Plan does not specifically provide for or manage temporary activities, with the exception of temporary military training activities, which means that the short term nature of effects is not recognised, provided for, or managed, and temporary activities require assessment in the same way as a permanent activity on a site.

Other processes outside of the District Plan also manage temporary activities, such as requirements to obtain liquor licence, building consent and permits to occupy. The District Plan does not seek to duplicate these requirements.

Key changes proposed are the introduction of provisions that specifically provide for and manage a range of temporary activities, structures and events in a way that does not duplicate other controls outside of the District Plan.

It is anticipated that the outcome of applying the proposed provisions will be that many temporary activities will be permitted thereby providing opportunities to enhance community, social, economic and cultural wellbeing. Identified temporary structures will similarly be permitted in most instances. Resource consent will be required, however, for those activities and structures that have potential to generate more significant adverse effects.

## 2. OVERVIEW AND PURPOSE

### 2.1 Purpose of Section 32 RMA

The overarching purpose of Section 32 of the Resource Management Act 1991 (RMA) is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.

Section 32 reports are intended to clearly and transparently communicate the reasoning behind plan provisions to the public. The report should provide a record of the evaluation process, including the consultation, technical work, methods, assumptions and risks that informed that process. A robust report can prove highly useful to decision makers, particularly where it clearly communicates the analysis undertaken to identify the most appropriate way to achieve the purpose of the RMA.

The District Council is required to undertake an evaluation of any proposed District Plan provisions before notifying those provisions. The Section 32 evaluation report provides the reasoning and rationale for the proposed provisions and should be read in conjunction with those provisions.

### 2.2 Topic Description

Temporary activities are infrequent, short-term activities with defined end times such as events, temporary artwork installations and mobile trading. Temporary use of structures for activities such as construction are also included in the topic.

There have been no plan changes to the Operative District Plan for temporary activities.

The purpose of the chapter is to provide specifically for temporary activities, recognising that the effects are likely to differ from activities that operate on an ongoing basis. The chapter will identify and enable activities where effects can be controlled, and those where further assessment through resource consent will be required. This approach will avoid temporary activities being unnecessarily restricted by application of District Plan provisions that anticipate longer term activities. The chapter does not include the regular use of sites for activities that may be short term in themselves, but occur on a regular or frequent basis, such as an events' venue, or some markets.

## 2.3 Significance of this Topic

Temporary activities can be significant in enhancing the social and cultural vitality of the District, as well as assisting essential services such as military training, and supporting the economy through activities such as film making, short term retail, festivals and events. The Operative District Plan does not enable or manage most temporary activities or the short term effects from temporary structures. Enabling emergency accommodation is expected to be needed only in exceptional circumstances, 'bridging the gap' until an emergency situation is declared.

The topic is of low significance because the activities that are enabled are reasonably infrequent, and of short duration and less likely to have significant adverse environmental, economic, social and cultural effects. Activity standards are required to be met for permitted activities to limit the extent of potential adverse effects.

## 2.4 Current Objectives, Policies and Methods

The Operative District Plan is effects-based and temporary activities are managed through standards that apply to a wide range of activities that occur in the District. Exemptions from the noise standards are included for temporary military training activities and helicopter flight movements associated with short-term events, and workers temporary accommodation rules.

The Operative District Plan does not otherwise provide for temporary activities, for example, markets, events or mobile trading. In addition, the Plan does not contain separate zones for open space areas, and temporary activities that occur within these public spaces are subject to the underlying zone provisions.

## 2.5 Information and Analysis

**Table 1 – List of relevant background assessments and reports**

<b>Title</b>	<b>Author</b>
District Plan Effectiveness Review	<i>Waimakariri District Council, March 2017</i>
<b>Description of Reports</b>	
An assessment of District Plan effectiveness was undertaken as an early step to identify issues and gaps for the District Plan Review. The review included an assessment of resource consent applications and conditions for a variety of topics, other methods used to manage activities outside the District Plan and a range of internal and external policy and legislative influences.	

The review identified a gap in the plan for the management of temporary activities and that specific rules for temporary activities would provide greater clarity and enable a range of activities that would otherwise require resource consent.

Title	Author
Waimakariri District Plan Review – Noise: Deliverable 3 – Issues and Options	<i>Marshall Day Acoustics, 17 April, 2019</i>

**Description of Reports**  
 Marshall Day were commissioned to provide a technical assessment of noise which included consideration of temporary activities. The assessment provided recommendations for noise management rules and standards [also see the s32 report for Noise].

## 2.6 Consultation Undertaken

Consultation has been undertaken as part of this District Plan Review process with key stakeholders and the local community. Feedback from consultation relevant to the Temporary Activities Chapter is contained in **Appendix One: Specific Consultation Comments and Response**, and is summarised below:

### Summary of feedback:

- (a) Temporary activities, and public artworks, particularly in public open spaces, would enhance community connectedness and cohesion.
- (b) Large scale or regular markets should be controlled and infrequent, small markets should be permitted.
- (c) Other controls exist for managing temporary events in council-managed parks and reserves, such as through the Reserves Act and Reserves Management Plans that set out the permissions or consents required for temporary activities within those areas.
- (d) Temporary activities should be enabled and supported, particularly if they are small, infrequent or located in locations that are considered appropriate. Temporary activities that exceed reasonable times, frequency, noise limits or other effect thresholds may require greater management e.g. by resource consent or other control.
- (e) There should be noise exclusions for temporary activities, but rules should still capture significant effects.
- (f) Appropriate provision should be made for some specific temporary activities such as military training activities.
- (g) Provision should continue to be made for emergency accommodation by official emergency services agencies.
- (h) Control of the duration, frequency, noise, traffic management and hours of operation for events, and removal of structures should be required for temporary activities.
- (i) Storage of a range of buildings such as relocatable homes were identified as compliance and enforcement issues.

## 2.7 Iwi Authority Advice

Clause 3(1)(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan. Clause 4A requires Council to provide a copy of a draft proposed plan to iwi authorities and have particular regard to any advice received. This section summarises the consultation feedback/advice received from the iwi authority relevant to temporary activities and the Council's consideration of, and response to (as required by section 32(4A)(b) RMA), that advice.

The iwi has reviewed the Temporary Activities Chapter and no advice was received specific to this chapter.

## 2.8 Reference to Other Relevant Evaluations

This s32 topic report should be read in conjunction with the following s32 evaluations:

- Noise - includes rules for temporary activities.
- Signs - includes rules for signs for temporary activities.
- Light – Temporary activities can often occur during night time hours and use outdoor artificial lighting that may result in glare and light spill that is not able to be fully internalised. The Light chapter contains specific provisions relating to glare and light spill and the management of effects on adjoining areas.
- Transport – which provides provisions relating to transport matters.

# 3. STATUTORY AND POLICY CONTEXT

## 3.1 Resource Management Act 1991

Section 5 of the RMA sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. In achieving this purpose, authorities need to recognise and provide for matters of national importance identified in section 6, have particular regard to other matters listed in section 7, and take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) under section 8.

The proposed provisions allow people and communities to provide for their social, economic, and cultural well-being by enabling a range of temporary activities that support those purposes. Effects on natural and physical resources and the life-supporting capacity of air, water, soil and ecosystems from any temporary activity or structure would be able to be avoided, mitigated or remedied through the proposed rules, resource consent assessment, provisions in other District Plan relevant chapters together with methods outside the District Plan.

### 3.1.1 Section 6

Temporary activities encompass a wide range of activities and potential locations. As such, it is possible that all of the matters of national importance could be relevant, depending on the location of the site and the values attached to that location, and the nature of the activity. Other sections of the plan will control activities in relation to the matters identified that will also apply to temporary

activities, such as rules for earthworks, activities on the surface of water, sites and areas of significance to Māori and historic heritage.

### **3.1.2 Section 7**

Section 7 (c) 'the maintenance and enhancement of amenity values' is the most relevant of the 'other matters' specified in section 7. Temporary activities can enhance District amenity providing for cultural, social, recreational, and business related events as well as celebrations and commemorations, but also have the potential to detract from amenity if adverse environmental effects such as effects from noise, are not managed.

The proposed provisions enhance or maintain amenity by enabling temporary activities where they meet activity standards to control potential adverse effects, and by requiring resource consent assessment where standards are not met.

### **3.1.3 Section 8**

Section 8 of the RMA requires the council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Tangata whenua, through iwi authorities, have been consulted as part of the review process. The iwi has reviewed the Temporary Activities Chapter and no feedback/advice was received specific to this chapter.

## **3.2 National Instruments**

The following national instruments are relevant to this chapter:

### **3.2.1 National Planning Standards**

Under RMA s75 (3), a District Plan must give effect to a National Planning Standard. The Proposed District Plan has been prepared in accordance with National Planning Standards 2019, which were introduced by the Resource Legislation Amendment Act 2017 to make plans and policy statements more useable, accessible and easier to prepare.

The Proposed District Plan will give effect to the National Planning Standards by including a separate district-wide chapter for temporary activities, structures and events. It also uses a standardised definition of temporary military training activity.

### **3.3 Regional policy statement and plans**

Chapter 5, Objective 5.2.1 of the Canterbury Regional Policy Statement relates to the location design and function of development, and includes a direction to enable people and communities, including future generations, to provide for their well-being, health and safety while also addressing a range of other planning considerations listed in (a)-(f). The proposed chapter enables a range of temporary activities which in part gives effect to the RPS policy direction.

Management of traffic effects from temporary activities is also consistent with Objective 5.2.3 relating to safe, efficient and effective operation of the transport network. The s32 assessments identified in 2.8 also describe how proposed provisions in other chapters give effect to RPS policies that could also apply to temporary activities, such as activities involving earthworks or located near a water body.

The Regional Land and Water Plan and Air Regional Plan are potentially relevant to activities that involve discharges to land or water, or activities within the bed of a water body.



### 3.4 Iwi Management Plan

The following Iwi Management Plan policies are relevant to this matter:

P5.2 To require that local and central government recognise that the following activities, when undertaken by tāngata whenua, are appropriate when they occur on their ancestral land in a manner that supports and enhances their ongoing relationship and culture and traditions with that land:

- (a) Papakāinga; (b) Marae; and (c) Ancillary activities associated with the above.

This is relevant to the extent that the ancillary activities mentioned in (c) may be of a temporary nature and these are generally enabled by the Temporary activities chapter provisions.

Policies for other topics may be relevant to particular temporary activities, particularly those that involve discharges to land, air or water, or are located on sites of significance to mana whenua. These policies will be taken into account in other chapters in the proposed plan, and through the relevant Regional Plans.

### 3.5 Any relevant management plans and strategies

Management plans are required for parks and reserves administered under the Reserves Act 1977 (except local purpose reserves). Reserve management plans set the objectives and policies that guide how a reserve is used, maintained and developed, and may specifically provide for some temporary activities.

Town Centre Plans for Rangiora, Kaiapoi, Oxford and Woodend provide a framework for ongoing development, growth and success of town centres, including aims that relate to use of public spaces for activities that strengthen town centre vibrancy, community and character.

### 3.6 Any other relevant legislation or regulations

The following legislation / regulations are relevant to this matter:

Section 53(1) of the **Reserves Act 1977** sets out functions for administering, managing, and controlling reserves. Including activities for public recreation or enjoyment. Under s53 (1)(e), controls event duration (6 days). This is relevant as it provides control for temporary activities on council-managed public land.

Temporary activities and structures may also have to comply with the **Building Act 2004** for any structures, **Food Hygiene Regulations 2006** for temporary food vendors, **The Sale and Supply of Alcohol Act 2012** regulates the sale, supply and consumption of alcohol, the **Camping Ground Regulations 1985** regulate short term camping in association with an event, and relevant bylaws **Liquor Ban Bylaw 2007**, **Parking Bylaw 2007**, **Solid Waste and Waste Handling Licensing Bylaw 2016**.

### 3.7 Any plans of adjacent territorial authorities

The District Council is required to have regard to the extent to which the District Plan needs to be consistent with the plans and proposed plans of adjacent territorial authorities under section 74(2)(c).

The district plans of Hurunui District, Selwyn District and Christchurch City Councils were considered.

The Christchurch District Plan's Chapter 6: General Rules and Procedures contains section 6.2 Temporary activities, Buildings and Events. The section enables a diverse range of activities while continuing to control a range of district wide matters such as historic and cultural values. There is a specific emphasis on providing opportunities for community vibrancy and economic recovery in the period following the Canterbury Earthquakes.

Selwyn District Council have recently notified their Proposed Plan (2020). As this has been developed under the National Planning Standards, the format is similar, and the activities and standards are broadly similar.

The Hurunui District Plan provides standards for temporary activities that are addressed in the zone rules including standards for duration, timing and traffic management. Provision is made for activities that include construction work, temporary military training and a range of events.

The Temporary activities chapter in the Proposed Waimakariri District Plan will be generally consistent with the approach of other neighbouring Councils because each Plan recognises and provides for a range of temporary activities with rules and standards to manage potential effects.

## 4. KEY RESOURCE MANAGEMENT ISSUES

The resource management issues set out in this section have been identified using sources of information including (but not limited to) the following:

- a. Monitoring and District Plan Effectiveness Review of the Operative District Plan
- b. Internal and external stakeholder consultation
- c. Issues and Options and '*What's the Plan*' consultation responses
- d. Review of best practice and background reports.

Three key issues were identified as follows:

### 4.1. Issue 1: Lack of a policy and rule framework to enable and manage temporary activities

The Operative District Plan does not provide for a range of temporary activities and these default to being assessed in the same way as a permanent activity, or treated as marginal or temporary in accordance with s87BB of the Resource Management Act 1991. For example, temporary structures associated with filming being required to meet the same rules as permanent structures. An exception to this are the specific noise provisions for temporary military training, helicopter flight movements associated with short-term events, and workers temporary accommodation rules. This approach may discourage temporary activities from occurring where resource consent is required, particularly smaller scale activities where the cost and time required for a resource consent assessment may be considered as prohibitive.

### 4.2 Issue 2: Temporary activities are also controlled through processes outside of the District Plan and duplication of processes should be avoided.

Many temporary activities are subject to management through other processes outside the District Plan such as liquor licencing, building consent, and permits or licences for food hygiene, camping

and use of public reserves and roads. These procedures act to control many of the potential effects from events or other activities, such as sale of alcohol and duration of events on public land.

Consultation feedback and District Plan Effectiveness Review indicate that although complaints have been made for temporary activities, many are tolerated. The preference expressed through consultation was to enable minor temporary activities, in particular for activities on public-land, such as within Open Space and Recreation Zones.

### 4.3 Issue 3 – Visual effects from temporary structures

Temporary structures associated with construction or a temporary activity may create adverse visual effects for neighbours that require control through the District Plan to limit the duration of potential effects.

## 5. OVERVIEW OF PROPOSED OBJECTIVES, POLICIES AND METHODS

### 5.1 Strategic Direction

There are no strategic directions immediately relevant to the Temporary activities chapter.

### 5.2 Zone / District-wide Subject

The district-wide chapter contains objectives, policies and rules that provide for and enable temporary activities and manage adverse effects.

### 5.3 Proposed Objectives and Policies

An objective and four policies are proposed as follows:

<b>Objective</b>
<b>TEMP–O1: Temporary activities</b>
Temporary activities that contribute to the District’s vitality, economic prosperity, and community health, safety and well-being are enabled where adverse effects are minimised.
<b>Policies</b>
TEMP–P1: Enabling temporary activities
Enable temporary activities, and minimise adverse effects on the natural values, cultural values and amenity values of the surrounding environment, by ensuring:
<ol style="list-style-type: none"> <li>1. the location, timing, duration, frequency, scale and intensity of the temporary activity is consistent with the quality of the environment anticipated by the objectives and policies of any relevant zone or overlay;</li> <li>2. adverse effects including noise, dust, light, shading, signs and traffic on any nearby activity are minimised to a level suitable for the time and location;</li> <li>3. any traffic movements maintain safety for road users, pedestrians, cyclists and the public, and the efficiency of the transport system;</li> <li>4. any natural, historic heritage or cultural values are protected from damage or destruction; and</li> <li>5. remediation of the site, including the removal of waste is undertaken.</li> </ol>

**TEMP-P2: Temporary activities and public spaces**

For public spaces:

1. enable temporary activities, such as events, artworks, filming and mobile trading that support community and economic well-being within the District; and
2. control adverse effects from temporary activities located in public spaces where the activities are not managed by other legislation, management plans or bylaws.

**TEMP-P3: Temporary structures**

Enable temporary structures required for construction or demolition, and temporary storage of relocatable buildings where potential effects on the transport system, and amenity values of the surrounding environment are mitigated by limiting the duration, and in the case of any relocatable building, the location and connection to services.

**TEMP-P4: Disaster management accommodation**

Enable temporary disaster management accommodation provided by civil defence or an emergency service organisation required to house people displaced by a disaster event, including in the time period before declaring a state of emergency.

**TEMP-P5: Mobile trading**

Enable mobile trading where adverse effects on retail distribution and development within any Commercial and Mixed Use Zones, amenity values, and transport are minimised by controlling the location, duration and scale of mobile trading activities.

## 5.4 Proposed Methods

The following methods are used to implement the proposed objectives and policies:

### 5.4.1 Rules

Temporary activities are either permitted where activity standards are met or provided for through a specific rule. There are specific temporary activity rules for:

- Mobile trading
- Filming
- Temporary military training activity
- Temporary storage of relocatable building
- Any temporary building or structure incidental to construction work
- Disaster management accommodation
- Motorised vehicle events
- Any other temporary activity

### 5.4.2 Activity Standards

Activity standards are proposed, in particular, to manage maximum duration (including for site preparation and restoration), vehicle movements, and frequency.

### 5.4.3 Other District Plan chapters

Other district-wide rules apply, unless exempted within the Temporary Activities Chapter. For example, there are rules for noise, earthworks, or activities within natural features and landscapes.

#### 5.4.4 Methods outside the District Plan

A range of other methods are identified such as bylaws, management plans and licence requirements that the provisions in the chapter do not duplicate, but which also assist in implementing the objectives and policies. These have been identified in the Advice Notes.

#### 5.4.5 Matters of Control or Discretion

Controlled or Restricted Discretionary Activities have the matters to which control is reserved or discretion is restricted listed. These matters identified are:

- Character and amenity values
- Transport
- Site alteration, disturbance and remediation
- Public safety and security

#### 5.4.6 Advice Notes

These are included to draw attention to best practice for notifying neighbours prior to an event, and other relevant considerations.

#### 5.4.7 Definitions

Definitions of terms used in the Temporary Activities Chapter are included in the Definitions Chapter, and include: temporary activity, temporary military training activity, mobile trading, disaster management accommodation, relocatable building, construction work, and motorised vehicle events.

## 6. SCALE AND SIGNIFICANCE EVALUATION

Section 32 (1)(c) of the RMA requires that a Section 32 report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed objectives, policies and methods.

The level of detail undertaken for the subsequent evaluation of the proposed objectives, policies and methods has been determined by this scale and significance assessment.

In particular, Section 32 (1)(c) of the RMA requires that:

- (a) Any new proposals need to be examined for their appropriateness in achieving the purpose of the RMA;
- (b) The benefits and costs, and risks of new policies and methods on the community, the economy and the environment need to be clearly identified and assessed; and
- (c) All advice received from iwi authorities, and the response to the advice, needs to be summarised.

Further, the analysis has to be documented to assist stakeholders and decision-makers understand the rationale for the proposed objectives, policies and methods under consideration.

In making this assessment regard has been had to a range of scale and significance factors, including whether the provisions:

- (a) Are of regional or district wide significance;
- (b) Involve a matter of national importance in terms of Section 6 of the RMA;
- (c) Involve another matter under Section 7 of the RMA;
- (d) Raise any principles of the Treaty of Waitangi (Te Tiriti o Waitangi) under Section 8 of the RMA;
- (e) Address an existing or new resource management issue;
- (f) Adversely affect people's health and safety;
- (g) Adversely affect those with particular interests including Māori;
- (h) Adversely affect a large number of people;
- (i) Result in a significant change to the character and amenity of local communities;
- (j) Result in a significance change to development opportunities or land use options;
- (k) Limit options for future generations to remedy effects;
- (l) Whether the effects have been considered implicitly or explicitly by higher order documents;  
and
- (m) Include regulations or other interventions that will impose significant costs on individuals or communities.

Policies and methods have been evaluated as a package, as together they address a particular issue and seek to meet a specific objective.

## 6.1 Evaluation of Scale and Significance

	Low	Medium	High
<b>Degree of change from the Operative Plan.</b>		✓	
The provisions are not anticipated to result in a significant change to the character and amenity of local communities, but provide greater clarity and certainty of activity status and requirements.			
<b>Effects on matters of national importance.</b>	✓		
Matters of national importance are managed through policy direction mainly through other sections of the Proposed Plan, such as overlays which still apply if the activity occurs in that location.			
<b>Scale of effects geographically (local, district wide, regional, national).</b>	✓		

The scale of effects is expected to be district-wide, although there may be examples of activities that draw people from other districts or regions. The chapter is drafted to be enabling of temporary activities while ensuring any adverse effects are minimised.			
<b>Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?)</b>	✓		
Temporary activities are infrequent, any impacts are short-term, and adverse effects are minimised.			
<b>Scale of effects on those with specific interests, e.g., Mana Whenua, industry groups.</b>	✓		
Temporary activities are infrequent, and any impacts are short-term. There may be some minor effects on those carrying out or organising activities e.g. the Ministry of Defence, event planners.			
<b>Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice? Is it consistent, inconsistent or contrary to those?</b>	✓		
In accordance with the National Planning Standards, the change to an activities-based plan format has resulted in a new chapter for temporary activities. The new rules are considered to be generally enabling and recognise that activities on public land can be controlled through other mechanisms.			
<b>Likelihood of increased costs or restrictions on individuals, communities or businesses.</b>	✓		
As many activities are enabled, the likelihood of increased costs are considered to be low, although for some activities cost of resource consent will be met by applicants, but this could reduce costs for the community (such as site restoration costs).			
<p><b>Summary of Scale and Significance</b></p> <p>Overall, the scale and significance of the proposal is low. The level of detail in this report corresponds with the scale and significance of the environmental, economic and cultural effects that are anticipated from the implementation of the temporary activities provisions.</p>			

## 7. EVALUATION OF PROPOSED OBJECTIVES

Section 32(1)(a) of the RMA requires the District Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA. The level of detail undertaken for the evaluation of the proposed objectives has been determined by the preceding scale and significance assessment. Below is a summary of the proposed objectives that have been identified as the most appropriate to address the resource management issue(s) and achieve the purpose of the RMA, against those objectives in the operative plan.

### 7.1 Evaluation of Proposed Objectives

Existing Objective/s – status quo	Appropriateness to achieve the purpose of the RMA
None	<p><b>Relevance:</b> not relevant due to lack of a specific objective for temporary activities.</p> <p><b>Reasonableness:</b> As there is no specific objective, for guidance it would be necessary to view the other objectives of the District Plan to assess for relevance to the particular activity, and the zone in which it occurs. Although this would provide some guidance on environmental expectations, it would not provide specific guidance for short term activities.</p> <p>Temporary activities would not be distinguished from permanent activities and would need to comply with standards unless approval for resource consent was granted. Standards that are needed for ongoing activities may be inappropriate for short-term activities, such as formed hard-surface for car parking areas, or height rules for temporary buildings associated with events or filming. This approach is less reasonable than the proposed objective.</p> <p><b>Achievability:</b> not applicable as no objective is specified.</p>

Proposed Objectives	Appropriateness to achieve the purpose of the RMA
<p>TEMP-O1: Temporary activities</p> <p>Temporary activities that contribute to the District's vitality, economic prosperity, and community health, safety and well-being are enabled where adverse effects are minimised.</p>	<p><b>Relevance:</b> The objective addresses relevant resource management issues including consideration of community and economic wellbeing, health and safety and identifying the necessity to minimise adverse effects, which is of importance to maintain amenity values.</p> <p>The objective gives effect to the RPS (as described in section 3.4 of this report).</p> <p><b>Reasonableness:</b> The objective is useful, clearly stated and should provide guidance to decision makers that anticipated activities contribute in one of the ways specified and minimise their adverse effects.</p> <p>The objective is reasonable as it will be enabling for a range of activities where effects are reasonably minimised by</p>



Proposed Objectives	Appropriateness to achieve the purpose of the RMA
	<p>meeting standards such as duration, frequency, noise and vehicle movements.</p> <hr/> <p><b>Achievability:</b> The objective will be able to be achieved through a combination of Temporary Activities Chapter methods, methods in other proposed chapters, and through methods outside of the District Plan such as through Licencing, Bylaws and Reserves Management Plan controls.</p>

## 7.2 Summary - Evaluation of Proposed Objectives

The proposed objective recognises the positive contribution of temporary activities, identifies that a more enabling approach to their management is appropriate and that adverse effects need to be managed to ensure amenity values are maintained. This objective will provide for clearer and more efficient management of temporary activities.

## 8. EVALUATION OF PROPOSED POLICIES AND METHODS

Section 32 (1)(b) of the RMA requires an evaluation of whether the proposed policies and methods are the most appropriate way to achieve the proposed objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the proposed policies and methods in achieving the objectives, and summarising the reasons for deciding on the proposed policies and methods.

The level of detail undertaken for the evaluation of the proposed policies and methods has been determined by the preceding scale and significance assessment.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed policies and methods, including opportunities for economic growth and employment.

The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

Policies and methods have been evaluated as a package, as together they address a particular issue and seek to meet a specific objective.

## 8.1 Evaluation of Proposed Policies and Methods

Proposed provisions to achieve the objective relating to temporary activities	Benefits Environmental, economic, social and cultural effects anticipated	Costs Environmental, economic, social and cultural effects anticipated	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>(Refer to sections 5.3 and 5.4 for a description of the proposed Policies and Methods)</p>	<p><b>Environmental:</b> As the activities are temporary they are unlikely to have lasting effects on the environment. Sites are to be restored to the same condition as prior to the temporary activity occurring.</p> <p>Effects on the environment are also managed through applicable district-wide rules in other chapters such as earthworks, and rules for significant natural areas.</p> <p><b>Economic:</b> Enables a range of temporary activities to occur as a permitted activity.</p> <p>Avoids duplication with other Council, or external permit or licencing processes. Advice notes advise other permissions or licences that may be required</p>	<p><b>Environmental:</b> Short-term effects may affect the surrounding environment, such as day time noise.</p> <p>Categories of temporary activities may emerge that would benefit from more specific provision that has not been foreseen by the proposed approach.</p> <p><b>Economic:</b> Possible cost of resource consent and compliance for some temporary activities.</p> <p><b>Social and cultural:</b> The introduction of a new management framework may require an education process to ensure the rules are being applied.</p>	<ol style="list-style-type: none"> <li>a. The policy and rules are more efficient as they permit a range of activities where environmental effects are able to be managed and minimised.</li> <li>b. The policies provide guidance on how the objective should be achieved and identifies matters that are relevant for temporary activities by outlining thresholds for when resource consent is required.</li> <li>c. A clear approach to management of public and private land is provided.</li> <li>d. Duplication with other regulation is largely avoided.</li> <li>e. The enabling approach is consistent with community expectations expressed through consultation and low levels of complaints received for temporary activities in the District.</li> <li>f. Specific noise rules for temporary activities have been included (within the noise</li> </ol>	<p>Sufficient information is available to act.</p> <p>The risks from not acting are:</p> <ol style="list-style-type: none"> <li>a. Lack of specific approach and clarity around what rules/standards temporary activities are to meet;</li> <li>b. that costs for applicants would be high where provisions for permanent activities are applied; and</li> <li>c. that there is a loss in community and economic vitality as temporary activities may be discouraged from occurring, as they are caught by catch-all rules in zone chapters.</li> </ol>

Proposed provisions to achieve the objective relating to temporary activities	Benefits Environmental, economic, social and cultural effects anticipated	Costs Environmental, economic, social and cultural effects anticipated	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	<p>Recognises the economic, social and cultural benefits of temporary activities. Provides opportunities for short term employment</p> <p><b>Social and cultural:</b></p> <p>Provides for temporary military training activities which have specific operational requirements.</p> <p>Provides certainty for the particular types of temporary activities, and sets limits for duration and frequency, and expectations for site remediation and advice to surrounding residents.</p>		chapter) appropriate to the nature of temporary activities.	
<p><b>Opportunities for economic growth and employment</b></p>				
<p>Opportunities are provided for a range of temporary activities of different scale that support economic growth and employment both directly, by providing short term employment associated with organising, site preparation, manufacture of equipment, devices or products associated with the activity and staff required for the activities, and indirectly by supporting training (e.g. military training) and attracting people to the district who may spend money at events, and at other businesses while in the district, such as accommodation and food and beverage providers.</p>				
<p><b>Options less appropriate to achieve the objective</b></p>				
<p>Option 2: Permit temporary activities, with no standards, and otherwise rely on methods outside the District Plan</p> <p>Appropriateness: This option would partly achieve the objective but is less appropriate as it would not efficiently or effectively manage potential adverse effects other than those controlled by other methods, such as bylaws or lease agreements. The outcomes would be less certain for the community as to whether temporary activities would be adequately</p>				

Proposed provisions to achieve the objective relating to temporary activities	Benefits Environmental, economic, social and cultural effects anticipated	Costs Environmental, economic, social and cultural effects anticipated	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
---	--	---	------------------------------	---

controlled. Social, cultural and community and business related temporary activities would be able to occur, subject to land owner restrictions, legislative and regulatory requirements, but there may be costs to the community, including reduction in amenity values, or environmental quality where activities have effects that conflict with zone expectations, or do not remediate sites adequately. Employment and economic growth opportunities could be similar to the proposal, although any loss of character resulting from inadequate management of adverse effects could detract from the perceived attractiveness of areas in the District and discourage investment and growth.

**Quantification**

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. Given the assessment of the scale and significance of the proposed changes above it is considered that quantifying costs and benefits would add significant time and cost to the s32 evaluation processes. The evaluation in this report identifies where there may be additional cost(s), however the exact quantification of the benefits and costs discussed was not considered necessary, beneficial or practicable.

**Options less appropriate to achieve the objective**

Option B: Status Quo  Remain silent on most temporary activities and the approach and provisions carried over from the Operative District Plan (see Section 2.4)	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	<b>Environmental:</b> Requiring many events to gain resource consent e.g. under the noise standards for the zones could apply more specific environmental controls leading to a reduction in adverse environmental effects.	<b>Environmental:</b> There would be no environmental effects anticipated.	Activity standards may not be appropriate for short term effects and would therefore be less effective in managing potential adverse effects. The option is less efficient as activities that could otherwise be	There is sufficient information to understand that the risk of acting on this proposal would have greater cost than benefit, and would be less efficient and less effective than the proposed option.

	<b>Economic:</b>	<b>Economic:</b> costs relating to compliance with activity standards that anticipate ongoing or regular use of a site for an activity and need for resource consent approval. Reduction in temporary activities due to these costs.	enabled, such as small scale community events, may require resource consent assessment.  Similarly, larger scale events may not be adequately captured for resource consent assessment.	
	<b>Social:</b> Social activities provided for through a resource consent pathway where rules for regular activities are not met.	<b>Social:</b> reduced opportunity to hold temporary activities that would enhance social connection within the community.	Aside from some provisions for temporary military training activities, helicopters and emergency accommodation, this option would be less effective as there would be no objective or policy framework that considers temporary activities, and rules/activity standards would also not specifically address general and particular temporary activities.	
	<b>Cultural:</b> Cultural activities provided for through a resource consent pathway where activity standards are not met.	<b>Cultural:</b> reduced opportunity to hold temporary activities that would support cultural aspects of community wellbeing within the community.		
<b>Opportunities for economic growth and employment</b>				
Reduced opportunities for employment when compared with the proposed provisions as application of Operative District Plan provisions would be likely to require resource consent for many temporary activities, which provides some employment for people involved in the resource consent process, but less overall, as many activities are likely to be discouraged from applying for resource consent.				

## 8.2 Summary - Evaluation of Proposed Policies and Methods

The proposed policies and methods are the most appropriate option to achieve the objectives for temporary activities in Waimakariri District as the benefits outweigh the costs (in 8.1) and the methods efficiently give effect to the proposed objective.

## 9. SUMMARY

The Operative District Plan does not specifically provide temporary activities or recognise their potential benefits to the community or the need for specific management of temporary effects. The proposed approach will enable a range of temporary activities depending on their nature and level of effects and seeks to avoid duplication with other regulatory processes, for example, those under the Reserves Act.

The proposed approach includes policies and rules that identify the activity status of temporary activities with greater certainty, and includes rules, standards and references to other methods that will be used to minimise potential adverse effects on surrounding sites. This approach is consistent with the objective. Some activities such as temporary military training, mobile trading, and filming have been identified due to their specific operational requirements and potential effects.

Activity standards and rules include thresholds to identify when resource consent is required to address effects that are above those anticipated by the community. Specific noise standards recognise that for a brief time within daytime hours, higher noise levels can be appropriate for temporary activities. The approach includes an expectation that sites used for temporary activities will be remediated to avoid any long-term effects.

## Appendix One: Specific Consultation Comments and Response

### Consultation

Date	Group	Subject Matter	Feedback	Response
September, 2017	Environment Canterbury	Issues and Options consultation	Supported open space provisions for parks, reserves, and provisions for temporary activities.	Provisions for temporary activities have been included in Open Space and Temporary Activities Chapters.
September, 2017	Summary of community responses	Issues and Options consultation	Provide specific areas for temporary activities in different areas of the district, including parks and reserves and a streamlined process for using such areas.  Surrounding residents could be warned about noise.	Appropriate locations for temporary have been considered including enabling temporary activities in parks and reserves.  An advice note is included to encourage notification of surrounding residents.
September, 2017	Kaiapoi-Tuahiwi Community Board	Issues and Options consultation	Supported Open space provisions for parks, reserves, and provisions for temporary activities.	Provisions for temporary activities have been included in the Proposed District Plan.
September, 2017	NZ Defence Force	Issues and Options consultation	NZDF supported a district plan framework that provides for Temporary military training activities (TMTA) as a permitted activity subject to appropriate standards in a general/district wide chapter or on a zone-by-zone basis. Given the temporary nature of the activities TMTA should not	Temporary military training activities have been provided for subject to compliance with standards.

			be subject to standards relating to the full range of aspects such as building height, parking etc. Consistent with the current WDP provisions, the standard noise provisions should not apply. Instead, any applicable noise standards should recognise the temporary and specialised nature of TMTA. Objectives and policies should provide for temporary activities.	
September, 2017	Pegasus Residents Group	Issues and Options consultation	Short-term activities without long term adverse effects should be allowed without resource consent.	A range of temporary activities have been enabled where standards are complied with the manage effects.
September, 2017	Canterbury District Health Board	Issues and Options consultation	The CDHB supports provision for temporary activities for open space that would enhance community connectedness and cohesion.	Temporary activities are permitted, subject to standards and enabled for open space areas.
April-December 2018	Waimakariri District Council compliance staff	Temporary activities	Control of the duration, frequency, noise, and hours of operation for events suggested. Also removal of structures from the site  Structures associated with temporary events should be removed within one week.	Controls have been included to manage for the matters identified and manage adverse effects on the amenity values of nearby sites.
April 2018- April 2019	Waimakariri District Council Greenspace Section	Temporary activities and council-managed Open Space and	The Reserves Act limits reserve use to six days at any time. Bookings and health and safety plans are also required and potential effects are taken into account when booking. Notification of surrounding	There is no limit on the number of events on council-managed parks and reserves. However, they are subject to some



		Recreation land	<p>residents prior to the event is required e.g. for fireworks displays. Repeat bookings can be refused if previous events have generated adverse effects, although there are no issues for most events.</p> <p>Noise and traffic identified as the main effects that could need management.</p> <p>Number of events</p> <p>No limit is needed in the District Plan for events on council-managed parks and reserves.</p> <p>Events at permanent facilities</p> <p>Larger events and venues should be subject to resource consent including conditions for the time of day and week for events, to control nuisance factors and minimise disruption to normal use of the site.</p>	effects-based controls, such as noise, but these offer more leniency than permanent activities.
April-July, 2018	Waimakariri District Council staff – Roading Section	Transport for temporary activities	<p>The Engineering Code of Practice requires Traffic Management Plans (TMPs) for activities that vary normal road operation.</p> <p>This is considered to be an effective method. Large events should be assessed from a transport effects.</p>	Restricted discretionary activities may consider a range of transport related matters as part of consent assessment and a TMP could be required as a condition of resource consent approval.

28th June, 2018	Technical Advisory Group	Temporary activities and structures	<p>Explore exemptions for emergency services and construction.</p> <p>Ensure structures do not become permanent.</p> <p>Review the role of the Local Alcohol Policy in controlling events with a temporary liquor license.</p> <p>Need controls for frequency, duration and shading effects.</p>	<p>Exemptions in the Noise and Light Chapters for emergency response.</p> <p>Temporary buildings and structures incidental to a building or construction are permitted.</p> <p>The Local Alcohol Policy has an advice note indicating licencing requirements.</p> <p>Rules included for duration of temporary structures.</p> <p>Temporary structures associated with events are permitted.</p>
July, 2018- April, 2019	Waimakariri District Council Planning Implementation Unit	Temporary activities	<p>Three consecutive days for temporary events enables them to take place during long weekends.</p> <p>Event thresholds based on attendance may be difficult to enforce.</p>	<p>A period of 7 days has been provided to allow for some longer events.</p> <p>It is also proposed to restrict the number of temporary</p>

			<p>Controls for fireworks should allow reasonable use.</p> <p>Some markets have caused traffic and parking issues that could be managed through resource consent. A period where a market could operate before triggering resource consent could be useful</p>	<p>activities on a site in a 12 month period.</p> <p>Attendees is not proposed as an activity criteria.</p> <p>Noise controls will apply to temporary activities.</p> <p>Noise and light effects from fireworks, timing of events, and notification advice notes are all proposed to apply, and allow for activities involving fireworks within set limits.</p> <p>Markets are only excluded from the definition of temporary activities where they occur on a regular basis, which would allow for trial operation prior to applying for resource consent for regular occurrence.</p> <p>Filming is subject to noise rules (lower noise limit for night-time), and a time limit for</p>
--	--	--	--	--

			<p>Filming hours of operation and site restoration are important considerations.</p> <p>Storage of relocatable houses, temporary sales offices, show homes and shipping containers were identified as issues.</p>	<p>clean-up and restoration.</p> <p>Relocated dwelling storage, sales offices, containers, and show homes are covered within the temporary activities chapter or other zone rules for structures and buildings.</p>
July 2018	District Planning and Regulation Committee	Temporary activities	<p>The District Plan approach should be to generally enable temporary activities.</p> <p>Large-scale or long duration events should be subject to traffic controls.</p> <p>Regular markets on a site (e.g. weekly) should be treated differently from one-off, infrequent markets.</p>	<p>Temporary activities are generally permitted, subject to standards to manage adverse effects. Resource consent required where standards are not met.</p> <p>A proposed definition clarifies when markets are included as a temporary activity.</p>

			<p>Mobile trading - The standards should depend on the zone e.g. stricter controls in residential areas.</p>	<p>Zone chapter rules also apply to ongoing market activities.</p> <p>Mobile trading, on a range of different site types are provided for noting that there are other zone controls, and licences for mobile trading on public land.</p>
26 July, 2018	Rangiora Promotions Association (RPA)	Temporary events	<p>Permits that are often required for temporary events.</p> <p>Event frequency, fireworks duration, hours of operation noise, and appropriateness of location are matters that may require control.</p>	<p>It is proposed that temporary activities are generally enabled, other permissions are noted, and the potential for a range of adverse effects are controlled through activity standards.</p> <p>Fireworks duration has not been controlled, but operators are encouraged to provide notice to surrounding properties. Legislation controls the sale of fireworks to the public to a four day period, and Worksafe control outdoor pyrotechnic displays.</p>

				Permission would also be required for operating pyrotechnic displays in parks and reserves
January, 2019	Waimakariri District Council Emergency Management Section	Disaster management accommodation	Many civil defence emergencies do not involve a State of Emergency declaration so provision in the DP will be helpful to provide for these events.	The proposed provisions enable disaster management accommodation.
18 March, 2019	Enterprise North Canterbury (ENC)	Temporary events	Locations where temporary activities should be enabled were identified, such as the Kaiapoi Regeneration Area. ENC considered the hours of operation to be more relevant than noise levels for one-off events.	Proposed to enable temporary activities in the Kaiapoi Regeneration Area and standards for hours of operation are included.
22 March, 2019	Waimakariri Winter Festival, Rangiora Festival of Colour Organisers	Temporary events, and Temporary artworks	<p>Permits are often required for temporary events. There should be flexibility for hours of operation for one-off events, particularly those that don't generate noise.</p> <p>Events in the centre of Rangiora should be permitted and are good for businesses.</p> <p>It is challenging to establish artworks e.g. a sculpture or chalk pictures on the side of buildings due to the lack of clarity of current requirements.</p>	<p>It is proposed that temporary activities are generally enabled, other permissions are noted, and the potential for a range of adverse effects are controlled through activity standards.</p> <p>Temporary activities, including artworks, in public spaces are enabled and subject to other controls. Zone rules for public spaces in town centres will also provide for</p>

				<p>temporary activities.</p> <p>Advice notes outline the additional permissions that might be required beyond the District Plan.</p>
April/May 2019	North Canterbury Clay Target Association	'What's the Plan' consultation	<p>8am-10pm are considered reasonable noise limits.</p> <p>Frequency suggested as one day in the weekend and two days during the week 8am-10pm.</p> <p>A more permissive approach could be given to existing consented gun clubs. Shooting events on private property should require consent, as there are enough facilities/clubs to cater for regional demand</p>	<p>The operation of a gun club at a site would be covered by zone rules for the use of a site for that activity.</p> <p>Temporary events are restricted to between 8:00am and 10:00pm; outside of these hours noise limits for the zone apply.</p> <p>Flexibility is provided for the duration and frequency of many temporary activities.</p>
April/May 2019	Pegasus Residents Group Incorporated	'What's the Plan' consultation	<p>What duration and frequency should apply for temporary activities?</p> <p>Issues associated with road closures around Pegasus sporting events. Recommend more communication with local organisations re</p>	<p>Road closures require permission from WDC. An advice note is proposed for road closure and resident notification.</p>

			residents' associations around planning.	
April/May 2019	Community response summary	'What's the Plan' consultation	<p>One respondent considered sport shooting should be included as a temporary activity.</p> <p>Two responses suggested 10pm as an acceptable limit on week nights and 12am for weekends. One response sought restriction of temporary activities to one weekend day and 2 week days between 8am to 10pm.</p> <p>Two other respondents wanted to ensure effective traffic management.</p> <p>Appropriate locations and activities include consented gun clubs, parks (for events like local festivals), temporary military training activities, Woodford Glen, town centres and other event locations (unspecified).</p>	<p>Sport shooting events could be considered as a temporary activities where it meets activity standards</p> <p>The proposed Noise Chapter contains controls for night time noise levels. These do not distinguish week and weekend hours. Where resource consent is required a later weekend limit could be considered.</p> <p>The proposed controls for timing and duration of temporary activities provide greater flexibility to ensure that a wide range of activities for different purposes are enabled, but managed through controls for effects such as noise and traffic.</p> <p>The proposed chapter recognises other controls for</p>



				<p>activities on Council-managed public land. Speedway activities are subject to controls within the Noise Chapter. Temporary Military Training Activities are also subject to specific rule requirements to manage potential adverse effects.</p>
April/May 2019	Woodend-Sefton Community Board	'What's the Plan' consultation	Consider appropriate hours for noise and use of trucks/heavy vehicles	Rules for noise and vehicle movements for temporary activities are proposed.
April/May 2019	Kaiapoi-Tuahiwi Community Board	'What's the Plan' consultation	<p>10pm weeknights, midnight on Friday and Saturday nights limits for events.</p> <p>Support specific sites i.e. Woodford Glen having specific rules.</p>	<p>Temporary activities noise controls between 8:00am and 10:00pm; or outside of these hours meet noise limits for the zone.</p> <p>There are specific noise rules for Woodford Glen, which is an existing activity for which resource consent conditions apply to manage noise effects and allow continued operation.</p>

April/May 2019	Christchurch District Health Board	What's the Plan consultation	Support infrequent temporary community activities where noise effects are managed through restrictions on duration, times, locations, use of amplified sound and event frequency.	It is proposed that temporary activities are generally enabled, other permissions are noted, and the potential for a range of adverse effects are controlled through activity standards.
April/May 2019	New Zealand Defence Force	What's the Plan consultation	Enable military training activities because of their short duration and more tolerable effects on the surrounding environment than permanent activities.	Temporary military training activities have been provided for, subject to applicable standards.
March 2021	Waka Kotahi NZ Transport Agency	First schedule consultation	<p>TEMP-P3 Temporary structures - Provisions for temporary activities are broad and do not include significant consideration of effects on state highways. It is suggested that further consideration should be given to the potential adverse effects on the transport network from temporary structures as part of this policy.</p> <p>TEMP-P5 Mobile Trading - In reviewing policy TEMP-P5 there is the potential for some confusion to arise in its application. Waka Kotahi request clarification on whether this policy applies to mobile trading in commercial zones only.</p> <p>TEMP-R4 Filming - Rule TEMP-R4 permits filming. On the basis of being a permitted activity, there is</p>	<p>Potential effects on the transport network has been added into the policy</p> <p>The wording of this policy has been reordered to make it clear that the policy applies to all zones.</p> <p>Filming is limited to 31 consecutive days at any one site. Adverse</p>

			<p>currently no avenue to consider the potential adverse effects from traffic generation. Waka Kotahi request that this be given some further consideration which could include whether an alternative activity status, such as controlled, may be more appropriate.</p> <p>TEMP-MD2 - Waka Kotahi supports that the matters of discretion include the assessment of transport effects, however as per above, there is no avenue for these matters to be considered for the listed permitted activities which are relatively permissive.</p>	<p>effects of traffic generation can be considered when this is exceeded. However, a standard for vehicle movements has now been included.</p> <p>A frequency rule has been added for mobile trading.</p> <p>Transport effects could be considered for any activity of a certain scale where the standards are not met.</p> <p>The rules in the Transport Chapter also apply.</p>
March 2021	Screen Canterbury	Filming	<p>Filming should be separated from other activities. Often filming would have to meet district plan rules for buildings even though they are temporary and this is difficult. Separating the activity from others makes rule requirements clear.</p> <p>Commercial filming should not be separated from non-commercial as it has the same effects. Supports changing the activity to Filming.</p>	<p>Filming is a separate activity contained in the Temporary Activities chapter.</p>