

OFFICER'S REPORT FOR:

Hearings Panel

SUBJECT:

**Proposed Waimakariri District Plan:
Tūramarama - Light**

PREPARED BY:

Jessica Manhire

REPORT DATED:

21 July 2023

DATE OF HEARING:

**Hearing Stream 5
21-25 August 2023**

Executive Summary

1. This report considers submissions received by the District Council in relation to the relevant objectives, policies, rules, advice notes, and matters of discretion of the Proposed Plan as they apply to the Light Chapter. The report outlines recommendations in response to the issues that have emerged from these submissions.
2. The Light Chapter received 52 submission points from 12 submitters, and three further submissions with 15 further submission points. Most submissions generally support the Light Chapter's provisions, while some seek amendments, and one submitter opposes three of the provisions.
3. The Light Chapter provides for outdoor lighting while managing adverse effects from glare and light spill. Glare relates to discomfort or disability from the brightness of a light source. Factors that contribute to glare are the light intensity, its source, and orientation of the viewer. Light spill, however, is light that is discernible beyond a site boundary which may have obtrusive effects on other sites.
4. The key issues raised in submissions to the Light Chapter are:
 - Lack of recognition and enablement of artificial outdoor lighting for primary production. Two submitters (HortNZ and NZPork) considered the chapter introduction had an urban focus and should recognise and enable artificial outdoor lighting for primary production. They seek LIGHT-O1 refer to intensive primary production. They considered LIGHT-S1 and LIGHT-S2 is unreasonable to apply to existing primary production activities.
 - Amendments sought to ensure outdoor lighting does not adversely affect the safe operation of the transport system. Waka Kotahi seek amendment to LIGHT-P1 so that potential adverse effects on transport safety can be considered more broadly. They seek clarification on how LIGHT-S1 applies to roads and seek LIGHT-S2 applies to all artificial outdoor lighting sources as the effects of glare are not limited to fixed lighting.
5. This report addresses each of these matters, as well as any other issues raised by submissions.
6. I recommend some amendments to the Proposed Plan provisions to address matters raised in submissions. These are summarised below:
 - The Light Chapter introduction refer to 'primary production';
 - "Rural production" be amended to "primary production" in LIGHT-O1 in order to include activities that the objective was not intending to exclude; and
 - Amend LIGHT-P1(2) to consider adverse effects on transport more broadly.
7. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the Proposed Plan should be amended as set out in **Appendix A** of this report.
8. For the reasons set out in the Section 32AA evaluation and included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:

- achieve the purpose of the RMA where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and
- achieve the relevant objectives of the Proposed Plan, in respect to the proposed provisions.

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Interpretation

9. This utilises a number of abbreviations for brevity as set out in Table 1 and Table 2 below:

Table 1: Abbreviations

Abbreviation	Means
RMA	Resource Management Act 1991
District Council	Waimakariri District Council / territorial authority
Operative Plan	Operative Waimakariri District Plan
Proposed Plan	Proposed Waimakariri District Plan
ECan	Environment Canterbury/Canterbury Regional Council
RPS	Operative Canterbury Regional Policy Statement

Table 2: Abbreviations of Submitters' Names

Abbreviation	Means
CIL	Clampett Investments Limited
DOC	Department of Conservation
ECan	Environment Canterbury / Canterbury Regional Council
Federated Farmers	Federated Farmers of New Zealand Inc.
Forest and Bird	Royal Forest and Bird Protection Society
HortNZ	Horticulture New Zealand
Kainga Ora	Kainga Ora - Homes and Communities
NZPork	New Zealand Pork Industry Board
RIDL	Rolleston Industrial Developments Limited
Waka Kotahi	Waka Kotahi NZ Transport Agency

1 Introduction

1.1 Purpose

10. The purpose of this report is to provide the Hearings Panel with a summary and analysis of the submissions received on the Light Chapter and to recommend amendments to the Proposed Plan in response to those submissions.
11. This report is prepared under section 42A of the RMA.
12. This report discusses general issues or topics arising, the submissions and further submissions received following notification of the Proposed Plan, makes recommendations as to whether or not these should be accepted or rejected, and concludes with a recommendation for amendments to the Proposed Plan provisions based on the preceding discussion in the report.
13. In preparing this report I have had regard to recommendations that the author has made in relation to the Signs s42A report to check for consistency and integration between the two chapters with respect to digital signs and illumination of signs. I am satisfied that the recommendations in the two reports are consistent with each other.
14. This report is provided to assist the Hearings Panel in their role as Commissioners. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.

1.2 Author

15. My name is Jessica Anneka Manhire. My qualifications and experience are set out in **Appendix C** of this report.
16. My role in preparing this report is that of an expert planner.
17. I was involved in the preparation of the Proposed Plan, including the drafting of the Light Chapter and contributed to the Section 32 Evaluation Report for Light.
18. Although this is a District Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the 2023 Practice Note issued by the Environment Court. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
19. The scope of my evidence relates to the Light Chapter. I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
20. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Supporting Evidence

21. The expert evidence which I have used or relied upon in support of the opinions expressed in this report includes the following:

- Nicholson, H. A. (2023). Statement of Evidence of Hugh Anthony Nicholson on behalf of Waimakariri District Council: Urban Design and Landscape (refer **Appendix C** of the Signs s42A Report).
- WSP. (2019, September 24). *District Plan Review Supporting Documents*. Retrieved from Waimakariri District Council:
https://www.waimakariri.govt.nz/__data/assets/pdf_file/0038/98399/21.-DELIVERABLE-ONE-1-DELIVERABLE-TWO-2-REPO~NICAL-REPORT-OXFORD-OBSERVATORY-APPENDIX-PREPARED-BY-WSP-OPUS-24-SEPTEMBER-2019.PDF

1.4 Key Issues in Contention

22. The Light Chapter received 52 submission points from 12 submitters, and three further submissions with 15 further submission points. Most submissions generally support the Light Chapter's provisions, while some seek amendments, and one submitter opposes three of the provisions.

23. I consider the following to be the key issues in contention in the chapter:

- Lack of recognition and enablement of artificial outdoor lighting for primary production. Two submitters (HortNZ and NZPork) considered the chapter introduction had an urban focus and should recognise and enable artificial outdoor lighting for primary production. They seek LIGHT-O1 refer to intensive primary production and considered LIGHT-S1 and LIGHT-S2 is unreasonable to apply to existing primary production activities.
- Amendments sought to ensure outdoor lighting does not adversely affect the safe operation of the transport system. Waka Kotahi seek amendment to LIGHT-P1 so that potential adverse effects on transport safety can be considered more broadly. They seek clarification on how LIGHT-S1 applies to roads and seek LIGHT-S2 applies to all artificial outdoor lighting sources as the effects of glare are not limited to fixed lighting.

24. I address each of these key issues in this report, as well as any other issues raised by submissions.

1.5 Procedural Matters

25. At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on the Light Chapter.

2 Statutory Considerations

2.1 Resource Management Act 1991

26. The Proposed Plan has been prepared in accordance with the RMA and in particular, the requirements of:

- section 74 Matters to be considered by territorial authority, and
- section 75 Contents of district plans.

27. There are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of the Proposed Plan. These documents are discussed in detail within the Section 32 Evaluation Report: Light.

2.2 Section 32AA

28. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA. Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

29. The required section 32AA evaluation for changes proposed as a result of consideration of submissions, with respect to light, is contained within the assessment of the submissions in section 3 of this report, as required by s32AA(1)(d)(ii). I have taken this approach due to what I consider to be the limited scale and significance of the recommended changes.

2.3 Trade Competition

30. Trade competition is not considered relevant to the Light Chapter provisions of the Proposed Plan.

31. There are no known trade competition issues raised within the submissions.

3 Consideration of Submissions and Further Submissions

3.1 Overview

32. The Light Chapter received 12 submissions comprising 52 submission points, and three further submissions comprising 15 further submission points. Most submissions generally support the Light Chapter's provisions, while some seek amendments, and one submitter opposes three of the provisions.
33. There were three general submissions on the Light Chapter. Two support the chapter in general and one seeks amendment.
34. There are two submissions on the Light Chapter Introduction which seek amendment.
35. There are six submissions on LIGHT-O1 with four in support of the objective, one opposes and one seeks amendment.
36. There are six submissions on LIGHT-P1, five support and one seeks amendment.
37. LIGHT-S1 and LIGHT-S2 received 10 submissions with six of these opposing or seeking amendments.
38. All submissions on LIGHT-O2, LIGHT-P2 and the rules (LIGHT-R1 to LIGHT-R3) were in support. This includes the sky glow provisions LIGHT-O2, LIGHT-P2 and LIGHT-R2 which had no submissions in opposition or seeking amendment.
39. There were also general further submissions from Richard and Geoff Spark [FS37], David Cowley [FS41], Miranda Hales [FS46], Royal Forest and Bird [FS78], Christchurch International Airport [FS80], R J Paterson Family Trust [FS91], and Ohoka Residents Association [FS137] in opposition or support of whole submissions. These further submissions have not been assessed against specific submission points because of their generic nature and lack of material relevant to the Light Chapter therefore I have not considered these further in this report.

3.1.1 Report Structure

40. In accordance with Clause 10(3) of Schedule 1 of the RMA, I have undertaken the following evaluation on a provisions-based approach. I have organised the evaluation in accordance with the layout of chapters of the Proposed Plan as notified.
41. Due to the number of submission points, the evaluation contained in the body of the report is generic only and may not contain specific recommendations on each submission point. I have considered substantive commentary on submissions contained in further submissions as part of my consideration of the submission(s) to which they relate in the assessment in the body of the report. This approach is consistent with Clause 10(2)(a) of Schedule 1 to the RMA. Specific recommendations on each submission and further submission point are contained in **Appendix B**.
42. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves.
43. I have provided a marked-up version of the Light Chapter with recommended amendments in response to submissions as **Appendix A**.
44. Definitions that relate to more than one topic have been addressed in the most relevant hearings report. The defined term 'sky glow' relates to this topic and did not receive any submissions.

3.1.2 Format for Consideration of Submissions

45. For each identified topic, I have considered the submissions that are seeking changes to the Proposed Plan in the following format:

- Matters raised by submitters;
- Assessment;
- Summary of recommendations; and
- Section 32AA evaluation (where amendments are recommended).

3.2 General Submissions

3.2.1 Matters raised by submitters

46. Clampett Investments Ltd (CIL) [284.1] and Rolleston Industrial Developments Ltd (RIDL) [326.2 and 326.3] seek that all controlled and restricted discretionary activities are amended to preclude them from limited or public notification. Royal Forest and Bird Protection Society Inc. (Forest and Bird) [FS78] oppose this relief via further submission on the basis that there may be instances where notification is appropriate. Andrea Marsden [FS199] and Christopher Marsden [FS120] both oppose RIDL [326.2] via further submission as all applications should be open for community consultation to give communities a voice and removing this could risk the system being exploited. The Ohoka Residents Association [FS84] oppose RIDL [326.2] and [326.3] via further submission on the basis that it is inconsistent with national policy direction and contrary to the Operative Plan and Proposed Plan and oppose the “inappropriate satellite town” proposed in Ohoka.

47. RIDL [326.1] seeks that all provisions in the Proposed Plan are amended to delete the use of absolutes such as ‘avoid’, ‘maximise’ and ‘minimise’ except where such explicit and absolute direction is appropriate. The submitter’s preference is that provisions do not include absolutes, so as to provide scope to consider proposals on their merits. There are four further submissions on RIDL [326.1], all opposed, from the Ohoka Residents Association [FS84], Andrea Marsden [FS119], and Christopher Marsden [FS120], and Forest & Bird [FS78]. Andrea Marsden [FS119] and Christopher Marsden [FS120] state that these absolutes have the purpose of ensuring compliance and removing them would open the system up for potential abuse. The Ohoka Residents Association [FS84] reiterate their opposition to the “inappropriate satellite town” proposed in Ohoka and state that the RIDL submission is inconsistent with national policy direction. Forest & Bird’s [FS78] reasoning did not relate to this submission point, rather it stated that there may be instances where it is appropriate to notify consents.

3.2.2 Assessment

48. These submissions seek amendments to the entire Proposed Plan, and I have considered them in the context of the Light Chapter. There are no controlled activities within the notified version of the Light Chapter but LIGHT-R2 and LIGHT-R3 are permitted activities which go to restricted discretionary activity status if there is a non-compliance with the activity standards. The RMA contains a specific process for determining notification on a case-by-case basis and, in my opinion, that statutory process should only be circumvented where it is clear that potential adverse effects will not affect other parties. No non-notification clauses are proposed as the standards are intended to set a threshold for when effects on affected persons may need to be identified, and affected persons can only be identified on a case-by-case basis depending on the

location of the outdoor lighting and its effects e.g. intensity, shielding, colour temperature and direction. The public should not be prevented from providing input to effects where it may be helpful to understand the nature of an adverse effect e.g. where light spill affects the amenity of neighbouring sites or roads. Accordingly, in my opinion, I do not agree with this request to prevent notification for these activities.

49. LIGHT-O1 contains the term 'minimising', and LIGHT-P2 contains the phrase "minimise adverse effects". The objective and policy are specific to what adverse effects are to be minimised e.g. amenity values, health and safety, which give effect to the purpose of the RMA, particularly s7(c) the maintenance and enhancement of amenity values and s7(f) maintenance and enhancement of the quality of the environment. Therefore, I consider the use of 'minimising/minimise' is appropriate as it provides for the range of 'avoid, remedy or mitigate'.

3.2.3 Summary of recommendations

50. For the reasons outlined in the assessment above, I recommend that the following submissions in terms of their application to the Light Chapter be **rejected**:
- i. RIDL [326.1, 326.2, and 326.3]; and
 - ii. CIL [284.1].
51. My recommendations in relation to further submissions are outlined in **Appendix B** and reflect my recommendations on submissions.
52. I recommend that no change be made to the Proposed District Plan.

3.3 Light Chapter Introduction

3.3.1.1 Matters raised by submitters

53. NZPork [169.24] and HortNZ [295.104] consider the introduction has an urban focus and would be improved by recognising and enabling artificial outdoor lighting associated with primary production. The submitters seek the introduction be amended as follows:

"...Lighting can benefit people and communities, for example by improving pedestrian and transport safety, and can be required for primary production, nighttime work, security and recreation..."

3.3.1.2 Assessment

54. The sentence is examples of purposes lighting can be required for and was not intended to be an exhaustive list. However, I consider the amendment would not have any material change to the chapter and would link to the recommended change to LIGHT-O1.

3.3.1.3 Summary of recommendations

55. I recommend that the submission points from NZPork [169.24] and HortNZ [295.104] be **accepted**:
56. I recommend the Light Chapter Introduction be amended as shown below, and in **Appendix A**:

"...Lighting can benefit people and communities, for example by improving pedestrian and transport safety, and can be required for primary production, nighttime work, security and recreation..."

3.4 Objectives

3.4.1 Objective – Light-O1 - Outdoor lighting

3.4.1.1 Matters raised by submitters

57. NZPork [169.25] opposes LIGHT-O1 as its reference to 'rural production'¹ means intensive primary production activities are excluded (via definition) and these activities rely on outdoor lighting. It seeks amendment of LIGHT-O1 to include intensive primary production activities.
58. HortNZ [295.105] seeks LIGHT-O1 be amended to refer to "primary production", which they consider is more appropriate than "rural production" as it includes a wider range of activities to be enabled in rural zones.
59. Waka Kotahi [275.44], CIL [284.279], RIDL [326.439], and Department of Conservation (DOC) [419.125] support LIGHT-O1 and seek it is retained as notified.

3.4.1.2 Assessment

60. The objective LIGHT-O1 is intended to express the overall outcome sought to be achieved in relation to outdoor lighting – both allowing its positive effects and managing its adverse effects (s32, p.18-19). I disagree with NZPork that the objective explicitly excludes intensive primary production activities as it was not intended to be an exhaustive list and the word "work" would already encompass those activities. I consider that the list of types of activities "including work, rural production, recreation activities, sport, entertainment, and transportation" do not add anything to LIGHT-O1 as the activity rules in the zone chapters manage these activities, and the Light Chapter only manages the light aspect.
61. The key difference between 'primary production' and 'rural production' is that 'primary production' includes the activities of aquaculture, quarrying, and mining while 'Rural production' does not. Rural production excludes outdoor intensive primary production activities or indoor intensive primary production activities and includes agricultural, pastoral, horticultural, forestry and woodlot activity. However, as LIGHT-O1 was not intended to differentiate these activities from other rural based land activities, I consider it provides clarity to use the broader term sought by NZPork and HortNZ.

3.4.1.3 Summary of recommendations

62. I recommend that the submission points from NZPork [169.25] and HortNZ [295.105] be **accepted**:
63. I recommend that the submission points from the following submitters be **accepted in part**:

-
- a. ¹ agricultural, pastoral, horticultural, forestry and woodlot activity; and
 - b. includes initial processing, as an ancillary activity, of commodities that result from the listed activities in (a);
 - c. includes any land and buildings used for the production of the commodities from (a) and used for the initial processing of the commodities in (b); but
 - d. excludes further processing of those commodities into a different product.
 - e. Rural production excludes outdoor intensive primary production activities or indoor intensive primary production activities.

- Waka Kotahi [275.44];
- CIL [284.279];
- RIDL [326.439]; and
- Department of Conservation [419.125].

64. I recommend LIGHT-O1 be amended as shown below, and in **Appendix A**:

"Outdoor lighting enables a range of activities including work, ~~rural~~ primary production, recreation activities, sport, entertainment, and transportation to occur beyond daylight hours while: ..."

3.4.2 Section 32AA evaluation

65. In my opinion, the amendment to LIGHT-O1 is the most appropriate to achieve the purpose of the Act. In particular, I consider that:

- It makes no substantial change to the objective as "primary production" was already encompassed by the objective with the term "work".
- The amendment would not have any material difference to the Light Chapter which manages the effects of light, rather than activities.
- The objective continues to allow the positive effects of lighting, while managing the adverse effects through clause 1 and 2 which would remain unchanged. These clauses are implemented through the Light Chapter's rules and standards and give effect to section 6 and section 7 of the RMA, in particular s7(c) maintenance and enhancement of amenity values and the policy direction of the Canterbury Regional Policy Statement (RPS), as identified in the Light s32 evaluation report (p.11-12).

3.5 Policies

3.5.1 Policy LIGHT-P1 Outdoor lighting

3.5.1.1 Matters raised by submitters

66. One submitter seeks an amendment to LIGHT-P1. Five submitters (NZPork [169.26], CIL [284.281], HortNZ [295.106] RIDL [326.441], and DOC [419.153]) support the policy as notified.

67. Waka Kotahi [275.45] supports enabling outdoor lighting for night-time activities, safety and security while ensuring that it does not adversely affect the safe, efficient, and effective functioning of the state highway network. It considers the transport safety aspect of LIGHT-P1(2) is too limiting in that it only relates to distraction or interference. It seeks an amendment to LIGHT-P1(2) so that potential adverse effects on transport safety can be considered more broadly, as follows:

"(2) ensuring that outdoor lighting does not adversely affect transport systems, including distractions ~~distract traffic or interfere with any traffic aids and signals on the road, air or sea;~~ and"

3.5.1.2 Assessment

68. I agree with the reasoning provided by Waka Kotahi as the policy as notified is limited to traffic distraction, and traffic aid and signal interference and consider the change would maintain the safe operation of the transport system more broadly.
69. The requested amendment would continue to give effect to the RPS, and meet the purpose of the RMA as the policy would still provide for health and safety and mitigates adverse effects of activities on the environment. It would continue to achieve the Light Chapter objectives because it will still enable a range of activities and dark sky visibility while the safe operation of the transport system is maintained. New lighting can continue to occur as long as transport systems are not adversely affected, and this is ensured through the chapter's rules.

3.5.1.3 Summary of recommendations

70. I recommend that the submission point from Waka Kotahi [275.45] be **accepted**.
71. I recommend that the following submission points be **accepted in part**, subject to amendments sought from other submitters:
- NZPork [169.26];
 - CIL [284.281];
 - HortNZ [295.106];
 - RIDL [326.441]; and
 - DOC [419.153].
72. I recommend that LIGHT-P1 clause 2 be amended to as shown below, and in **Appendix A**:

(2) ensuring that outdoor lighting does not adversely affect the operation of transport systems, including distractions to users ~~distract traffic or interfere with any traffic aids and signals on the road, air or sea;~~ and

3.5.2 Section 32AA evaluation

73. In my opinion, the recommended amendment to LIGHT-P1 is more appropriate in achieving the objectives of the Proposed Plan than the notified provision. I consider the amended policy would continue to be enabling of a range of activities (LIGHT-O1), while maintaining dark sky visibility (LIGHT-O2). The safe operation of the transport system (LIGHT-O1(2)) is maintained more broadly and not limited to traffic distraction, and traffic aid and signal interference. The recommended amendment will not have any greater environmental, economic, social, and cultural effects than the notified provision.

3.6 Standards

3.6.1 Standard LIGHT-S1 General standards for light

3.6.1.1 Matters raised by submitters

74. NZPork [169.27] and HortNZ [295.107] seek deletion of LIGHT-S1 as it relates to new sites and new road corridors. They consider it is unreasonable to apply the standard to an existing primary

production activity and for new lifestyle or bonus allotments to potentially constrain existing lawful primary production. They consider it is only reasonable for the standard to apply to existing sites and road corridors. NZPork consider existing use rights would not avoid conflict and reverse sensitivity operational constraints. A further submission from Waka Kotahi [FS110] opposes these submissions as the amendments seek to exclude light spill limits on activities adjacent to new road corridors.

75. A submission from Waka Kotahi [275.48] seeks clarification about how LIGHT-S1 applies to roads and controls the effects of light spill onto roads, and questions why it is appropriate to apply the standard to roads. The submitter considers it is unclear whether a road would adopt the adjoining zone limits or whether there should be separate limits for light spill onto roads. It is concerned about excessive light spill on to roads and adverse effects on the safe, efficient, and effective functioning of the land transport network. It requests evidence on why this standard is appropriate if it does apply to roads.
76. CIL [284.286] and RIDL [326.446] support LIGHT-S1 as notified.

3.6.1.2 Assessment

77. Regarding the submissions from NZPork [169.27] and HortNZ [295.107]; when subdivision occurs, the effect of new lighting on the existing environment can be considered via SUB-MCD10. I do not consider that lighting from new activities would constrain existing sites and road corridors because the light spill is measured from the receiving zone.
78. I consider that LIGHT-S1 does not apply to existing lights where they have existing use rights under section 10 of the RMA, therefore these standards only apply to new lighting activities. In my opinion, it is unnecessary for the provision to specifically refer to new lighting as the Proposed Plan provisions only apply to new, not existing, development and activities. There would be no requirement to upgrade existing lighting to meet LIGHT-S1.
79. Regarding NZPork and HortNZ's concerns about reverse sensitivity from lifestyle sites and bonus allotments on primary production relating to light; this is a consideration at the time of subdivision; the Subdivision Chapter includes reverse sensitivity as a matter of discretion (SUB-MCD10).
80. Waka Kotahi seeks clarification about how LIGHT-S1 applies to roads and controls the effects of light spill onto roads. However, it is already stated in the standard (LIGHT-S1(1)(a)) that it is to be measured or calculated 2m within the boundary of any adjacent site or *road corridor* (my emphasis). [Expert advice](#) received when drafting the Light Chapter provisions was that a specific standard for roads would not provide significant benefit over the proposed general light spill rules (WSP, 2019, p,4). I consider that the submitter's relief sought is already provided for in the notified version of LIGHT-S1(1)(a) and therefore no amendments are required.

3.6.1.3 Summary of recommendations

81. I recommend that the submission points from CIL [284.286], RIDL [326.446] and further submission from Waka Kotahi [FS110] be **accepted**.
82. I recommend that the submission points from NZPork [169.27], Waka Kotahi [275.48], and HortNZ [295.107] be **rejected**.
83. I recommend that no change be made to LIGHT-S1.

3.6.2 Standard LIGHT-S2 Control of glare

3.6.2.1 Matters raised by submitters

84. NZPork [169.28] oppose LIGHT-S2 as they consider it unreasonable to be applied to existing primary production activities that could be constrained by new sensitive development. HortNZ [295.108] also considers the provision would only be reasonable in the case of existing sites, roads, footpaths, and cycle paths, noting that new sensitive activities could locate adjacent to existing primary production activity and constrain an existing activity. The submitters consider existing use rights would not be sufficient to avoid conflict and reverse sensitivity operational constraints.
85. Waka Kotahi [FS110] opposes these submission points, as they seek to exclude measures to control glare from outdoor lighting on properties adjacent to roads, footpaths and cycleways, which does not take into consideration that glare from lighting can adversely affect the safe, efficient and effective functioning of the land transport network.
86. A submission from Waka Kotahi [275.49] supports LIGHT-S2 managing glare from artificial outdoor lighting by requiring it be directed away from and/or screened from roads; however, it seeks that it apply to all artificial lighting sources as the effects of glare are not limited to fixed lighting.
87. CIL [284.287] and RIDL [326.447] support the standard as notified.

3.6.2.2 Assessment

88. The standard controls glare by requiring any fixed outdoor lighting to be orientated such that the peak output intensity is directed at least 20° below horizontal. Where new development occurs, the effect of new lighting on the existing environment can be considered. While the rule does not specify new vs existing lights, s10 of the RMA provides a pathway for existing legally established uses to continue.
89. Regarding the submitter's concerns about reverse sensitivity effects from lifestyle sites and bonus allotments on primary production; reverse sensitivity is a consideration at the time of subdivision and the Subdivision Chapter includes reverse sensitivity as a matter of discretion (SUB-MCD10).
90. I consider it is not necessary that the provision specifically refer to new lighting as the Proposed Plan rules only apply to new activities and development, not existing. There is no requirement to upgrade existing lighting to meet the standard.
91. Regarding Waka Kotahi's request to delete the word "fixed"; the purpose of the word "fixed" was so it would not apply to moving objects (e.g., vehicles used for farming activities) as that was considered overly restrictive and unenforceable. There were no known issues with non-fixed lighting in the District. Lights for motor vehicles and bikes on roads are covered by the *Land Transport Rule: Vehicle Lighting 2004* pursuant to section 152 of the Land Transport Act 1998 and their effects may be considered as part of subdivision design. It is unclear what non-fixed sources of lighting need to be controlled (e.g. vehicle headlights, mobile irrigators) and the submitter has been contacted several times to clarify this. However, at the time of writing this report, no response had been received. As no evidence of adverse effects of lighting on roads has been provided in support of this submission, I cannot agree with what the submitter is seeking.
92. Urban design and landscape advice from Hugh Nicholson (Statement of Evidence of Hugh Anthony Nicholson on behalf of Waimakariri District Council: Urban Design and Landscape) relating to

specific submissions on the Signs Chapter recommended LIGHT-S2 “is not particularly useful for assessing digital signage which is intended to be visible and to be seen from public spaces”. Mr Nicholson recommended maximum luminance levels in the Proposed Plan specifically for signs (p.15). This was a consideration during drafting the Signs and Light Chapters and advice received at the time was that no additional requirements for illuminated signs are necessary. It was also recommended that an inward aim requirement is not practical for illuminated signs, and I agree (WSP, 2019, p.5). An exemption was not provided in LIGHT-S2 for digital signage which appears to have been an error. However, I consider there is no scope provided in submissions to amend this.

3.6.2.3 Summary of recommendations

93. I recommend that the submissions points from CIL [284.287] and RIDL [326.447] and further submission from Waka Kotahi [FS110] be **accepted**.
94. I recommend that the submission points from NZPork [169.28], HortNZ [295.108], and Waka Kotahi [275.49] be **rejected**.
95. I recommend that no change be made to LIGHT-S2.

4 Conclusions


96. Submissions have been received in support of, in opposition to, and seeking amendments to, the Proposed Plan.
97. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the Light Chapter of the Proposed Plan be amended as set out in **Appendix A** of this report.
98. For the reasons included throughout this report:
- I consider that the proposed provisions, with the recommended amendments, will be the most appropriate means to achieve the relevant objectives of the Proposed Plan.
 - The recommended amendment to LIGHT-O1 is the most appropriate to give effect to the RPS and achieve the purpose of the RMA, and
 - The recommended amendment to LIGHT-P1 continues to achieve the Light Chapter objectives as it enables a range of activities and dark sky visibility, while maintaining the safe operation of the transport system.

Recommendations:

I recommend that:

1. The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in **Appendix B** of this report; and
2. The Proposed Plan is amended in accordance with the changes recommended in **Appendix A** of this report.

Signed:

Name and Title		Signature
Report Author	Jessica Manhire <i>Policy Planner – Waimakariri District Council</i>	

Appendix A. Recommended Amendments to the Light Chapter

Where I recommend changes in response to submissions, these are shown as follows:

- Text recommended to be added to the Proposed Plan is underlined.
- Text recommended to be deleted from the Proposed Plan is ~~struck through~~.

LIGHT - Tūramarama - Light

Introduction

Outdoor lighting can have both positive and negative effects on amenity values. Lighting can benefit people and communities, for example by improving pedestrian and transport safety, and can be required for primary production,² night-time work, security and recreation. However, excessive light spill and glare can also adversely affect amenity values, the natural and cultural environment, health and safety and visibility of the night sky. For instance, glare can cause a safety hazard such as impacting on a driver's ability to see. Excessive ambient light levels can affect sleep quality.

This chapter provides for outdoor lighting while managing adverse effects from glare and light spill. Glare relates to discomfort or disability from the brightness of a light source. Factors that contribute to glare are the light intensity, its source, and orientation of the viewer. Light spill, however, is light that is discernible beyond a site boundary which may have obtrusive effects on other sites.

Glare and light spill can arise from artificial illumination from outdoor sources such as sports field lighting, security lighting, advertising signs, exterior building lighting, and outdoor lighting for parking areas and paths.

The effects from lighting on amenity values will depend on the type of light, its strength, colour, direction or orientation, whether it flashes, is shrouded or shielded in some way, its location, and the hours of operation.

The provisions in this chapter are consistent with the matters in Part 2 - District Wide Matters - Strategic Directions and give effect to matters in Part 2 - District Wide Matters - Urban Form and Development.

Other potentially relevant District Plan provisions

As well as the provisions in this chapter, other District Plan chapters that contain provisions that may also be relevant to Light include:

- Special Purpose Zone (Kāinga Nohoanga): how the Light provisions apply in the Special Purpose Zone (Kāinga Nohoanga) is set out in SPZ(KN)-APP1 to SPZ(KN)-APP5 of that chapter.
- Any other District wide matter that may affect or relate to the site.
- Zones: the zone chapters contain provisions about what activities are anticipated to occur in the zones.

Objectives	
LIGHT-O1	Outdoor lighting Outdoor lighting enables a range of activities including work, rural <u>primary</u> ³ production, recreation activities, sport, entertainment, and transportation to occur beyond daylight hours while:

² NZPork [169.24], HortNZ [295.104]

³ NZPork [169.25], HortNZ [295.105]

	<ol style="list-style-type: none"> 1. minimising adverse effects on amenity values, health and safety, ecology, significant natural values, areas of historic or cultural significance; and 2. maintaining the safe operation of the transport system.
LIGHT-O2	Sky glow Dark sky visibility is maintained and enables ongoing use of the Oxford Observatory.
Policies	
LIGHT-P1	Outdoor lighting Enable outdoor lighting for night-time activities, safety and security while: <ol style="list-style-type: none"> 1. remedying or mitigating adverse effects from light spill or glare on the receiving environment by controlling the intensity, shielding, colour temperature and direction of light; 2. ensuring that outdoor lighting does not <u>adversely affect the operation of transport systems, including distractions to users</u>distract traffic or interfere with any traffic aids and signals on the road, air or sea;⁴and 3. ensuring lighting is compatible with the zone or zones in which the light spill and glare is received by applying the light levels for the receiving zone.
LIGHT-P2	Outdoor lighting design - sky glow Reduce the potential for upward light spill that contributes to sky glow, by controlling the location, direction, design and operation of outdoor lighting to minimise adverse effects on: <ol style="list-style-type: none"> 1. amenity values including ability to view the night sky; 2. health and well-being of people and ecosystems; and 3. ongoing use of the Oxford Observatory.

Activity Rules

LIGHT-R1	Navigational lighting, traffic signals, illuminated official signs for traffic, and temporary lighting for emergency response	
All Zones	Activity status: PER	Activity status when compliance not achieved: N/A
LIGHT-R2	Use of outdoor lighting within the Oxford Observatory Protection Overlay	
Oxford Observatory Light Protection Area Overlay	Activity status: PER Where: <ol style="list-style-type: none"> 1. except for festive lighting displays during December and January, or for a maximum of 30 days in June or July of any year, and temporary activities between 7:00am and 10:00pm, and as provided by LIGHT-R1, the following apply: <ol style="list-style-type: none"> a. shielding: all outdoor lighting including 	Activity status when compliance not achieved: RDIS Matters of discretion are restricted to: LIGHT-MD1 - Outdoor lighting

⁴ Waka Kotahi [275.45]

	<p>illuminated signs shall be shielded from above in such a manner that the edge of the shield shall be below the whole of the light source; and</p> <p>b. the following outdoor lighting shall not be illuminated or displayed between 9:00pm and sunrise:</p> <ul style="list-style-type: none"> i. searchlights, except emergency searchlights; ii. outside illumination of any building or feature by floodlight. 	
LIGHT-R3	General use of outdoor lighting	
All Zones	<p>Activity status: PER Where:</p> <ul style="list-style-type: none"> 1. LIGHT-S1 and LIGHT-S2 are met. 	<p>Activity status when compliance not achieved: RDIS Matters of discretion are restricted to: LIGHT-MD1 - Outdoor lighting</p>
	<p>Advisory Note</p> <ul style="list-style-type: none"> • See Figure LIGHT-1: Lighting Design Guidance for advice on reduction of light spill and glare. 	

Light standards

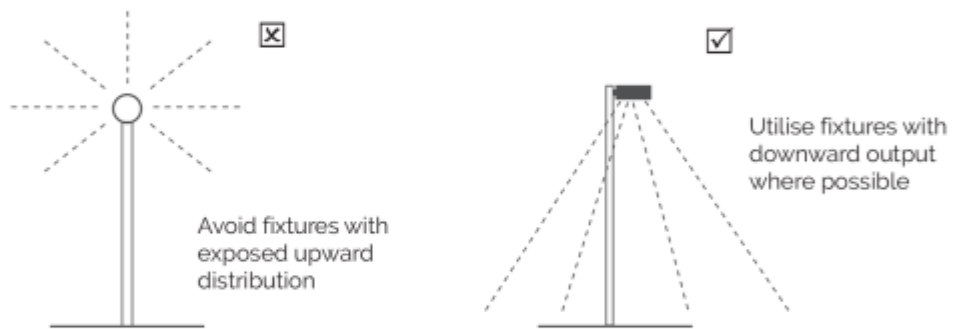
LIGHT-S1 General standards for light	
<p>1. Activities shall comply with the standards specified in Table LIGHT-1, where:</p> <ul style="list-style-type: none"> a. the added horizontal or vertical illuminance from the use of outdoor lighting must not exceed the limits for the receiving zone specified in Table LIGHT-1 when measured or calculated 2m within the boundary of any adjacent site or road corridor; and b. the illuminance shall be measured facing the applicable vertical plane that is directly facing the light source site boundary; and c. where a site is divided by a zone boundary, each part of the site shall be treated as a separate site. 	<p>Activity status when compliance not achieved: RDIS Matters of discretion are restricted to: LIGHT-MD1 - Outdoor lighting</p>

Table LIGHT-1: Light spill limits by zone

Zone	Illuminance (Ev) Lux (6:00am - 10:00pm)	Illuminance (Ev) Lux (10:00pm - 6:00am)
Natural Open Space Zone	2	1
Rural Zones	5	2
Residential Zones, Special Purpose Zone (Kāinga Nohoanga), Open Space Zone, Sport and Active Recreation Zone, Special Purpose Zone (Kaiapoi Regeneration), Special Purpose Zone (Pines Beach and Kairaki Regeneration).	10	4
Commercial and Mixed Use Zones, Industrial Zones, Special Purpose Zone (Hospital), Special Purpose Zone (Museum and Conference Centre), Special Purpose Zone (Pegasus Resort).	20	10
LIGHT-S2 Control of glare		
<p>1. Any fixed outdoor lighting shall be:</p> <p>a. orientated such that the peak output intensity is directed at least 20° below horizontal, and be aimed away from adjacent sites, roads, footpaths and cycle paths, and from navigation sight lines for sea or air navigation.</p>	<p>Activity status when compliance not achieved: RDIS</p> <p>Matters of discretion are restricted to:</p> <p>LIGHT-MD1 - Outdoor lighting</p>	
<p>Advisory note</p> <ul style="list-style-type: none"> • See Figure LIGHT-1 for guidance on lighting design to reduce light spill and glare. • The requirements to aim light away from roads, footpaths and cycle paths shall not apply to lighting provided within, and specifically to illuminate, these facilities. 		

Figure LIGHT-1: Lighting design to reduce light spill and glare

FIXTURE TYPE AND AIM



FIXTURE OUTPUT



Advice Note

LIGHT-AN1	Any illuminated sign or digital sign must also meet the applicable rules in the Signs Chapter.
LIGHT-AN2	Australian/New Zealand Standard AS/NZS4282:2019 (Control of the obtrusive effects of outdoor lighting) may apply to light level limitation, determination of the degree of glare or discomfort and mitigation measures.

Matters of Discretion

<p>LIGHT-MD1</p>	<p>Outdoor lighting</p> <ol style="list-style-type: none"> 1. Effects on the amenity values of the site and adjoining sites, or surrounding area. 2. Effects on the characteristics, form, or function of the zone consistent with the zone chapters. 3. Effects of light colour, flashes, strength, siting, shielding, angle, and hours of operation. 4. Effects on any activities sensitive to light including the following: <ol style="list-style-type: none"> a. effects on the efficient and effective functioning of any road, and the safety of road users; b. effects on aviation or navigation including effects on flights to and from Christchurch International Airport; and c. the effects of the lighting on cultural or amenity values of the night sky, and on astronomical observation. 5. The extent that the proposal controls the adverse effects of outdoor lighting on health, safety and security, considering CPTED. 6. Effects of lighting on ecology and natural values. 7. Any relevant standards including those which address the amenity and safety effects of outdoor lighting.
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Appendix B. Recommended Responses to Submissions and Further Submissions

The recommended responses to the submissions made on this topic are presented in **Table B 1** below.

Table B 1: Recommended responses to submissions and further submissions – Light

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested (Summary)	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
Light Chapter - General							
147.18	Kaiapoi-Tuahiwi Community Board	General	Not specified.	N/A	Accept	The submitter has not specifically commented on the Light Chapter but supports the provisions in the General District Wide Matters.	No
155.6 ⁵	Woodend-Sefton Community Board	General	Amend so that footpath lighting is softer and could be triggered by sensors to be more sustainable, better for ecology, including insects, viewing the night sky, and to reduce light spill.	N/A	Reject	The standards are not preventing this type of lighting to be installed. They are intended to address effects of all types of lighting. This is not a District Plan matter.	No
FS 110	Waka Kotahi	General	Reject the submission.	N/A	Accept	Waka Kotahi opposes submission 155.6 as is concerned that streetlights turning on and off unpredictably could cause a distraction, and thereby safety risk to highway motorists. However, LIGHT-S2 controls the effects of glare.	No
325.145	Kainga Ora	General	Retain Light Chapter as notified.	N/A	Accept	The submitter supports the Light Chapter.	No
Light Chapter - Introduction							
169.24	NZPork	Introduction	Amend the introduction: "Outdoor lighting can have both positive and negative effects on amenity values. Lighting can benefit people and communities, for example by improving pedestrian and transport safety, and can be required for <u>primary production</u> , night-time work, security and recreation. ... "	3.3	Accept	See the relevant section of the report.	Yes
295.104	HortNZ	Introduction	Amend Light Chapter Introduction, first paragraph: "Outdoor lighting can have both positive and negative effects on amenity values. Lighting can benefit people and communities, for example by improving pedestrian and transport safety, and can be required for <u>primary production</u> , night-time work, security and recreation. However, excessive light spill and glare can also adversely affect amenity values, the natural and cultural environment, health and safety and visibility of the night sky. For instance, glare can cause a safety hazard such as impacting on a driver's ability to see. Excessive ambient light levels can affect sleep quality."	3.3	Accept	See the relevant section of the report.	Yes

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested (Summary)	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
LIGHT-O1							
169.25	NZPork	LIGHT-O1	Delete LIGHT-O1 and replace with an objective that includes intensive primary production activities.	3.4.1	Accept	See the relevant section of the report.	Yes
275.44	Waka Kotahi	LIGHT-O1	Retain LIGHT-O1 as notified.	3.4.1	Accept in part	Accept in part, subject to amendments made in response to other submissions.	No
284.279	CIL	LIGHT-O1	Retain LIGHT-O1 as notified.	3.4.1			
295.105	HortNZ	LIGHT-O1	Amend LIGHT-O1: "Outdoor lighting enables a range of activities including work, rural primary production, recreation activities, sport, entertainment, and transportation to occur beyond daylight hours while: ..."	3.4.1	Accept	See the relevant section of the report.	Yes
326.439	RIDL	LIGHT-O1	Retain LIGHT-O1 as notified.	3.4.1	Accept in part	Accept in part, subject to amendments made in response to other submissions.	No
419.125 ⁶	Department of Conservation	LIGHT-O1	Retain LIGHT-O1 as notified.	3.4.1			
LIGHT-O2							
270.1	George Jason Smith	LIGHT-O2	Not specified.	N/A	Accept	The submissions are all in support of the objective.	No
284.280	CIL	LIGHT-O2	Retain LIGHT-O2 as notified.	N/A			
326.440	RIDL	LIGHT-O2	Retain LIGHT-O2 as notified.	N/A			
419.126 ⁷	Department of Conservation	LIGHT-O2	Retain LIGHT-O2 as notified.	N/A			
LIGHT-P1							
169.26	NZPork	LIGHT-P1	Retain LIGHT-P1 as notified.	3.5.1	Accept in part	Accept in part, subject to amendment made in response to 275.45.	No
275.45	Waka Kotahi	LIGHT-P1	Amend LIGHT-P1(2): "... 2. ensuring that outdoor lighting does not <u>adversely affect transport systems, including distractions</u> distract traffic or interfere with any traffic aids and signals on the road, air or sea; ..."	3.5.1	Accept	See the relevant section of the report.	Yes
284.281	CIL	LIGHT-P1	Retain LIGHT-P1 as notified.	3.5.1	Accept in part	Accept in part, subject to amendments made in response to 275.45.	No
295.106	HortNZ	LIGHT-P1	Retain LIGHT-P1 as notified.	3.5.1			
326.441	RIDL	LIGHT-P1	Retain LIGHT-P1 as notified.	3.5.1			
419.153 ⁸	Department of Conservation	LIGHT-P1	Retain LIGHT-P1 as notified.	3.5.1			
LIGHT-P2							
284.282	CIL	LIGHT-P2	Retain LIGHT-P2 as notified.	N/A	Accept	The submissions are all in support of the policy.	No
326.442	RIDL	LIGHT-P2	Retain LIGHT-P2 as notified.	N/A			
419.127 ⁹	Department of Conservation	LIGHT-P2	Retain LIGHT-P2 as notified.	N/A			

⁶ Support – Forest and Bird [FS78] – Officer recommendation: accept in part

⁷ Support – Forest and Bird [FS78] – Officer recommendation: accept

⁸ Support – Forest and Bird [FS78] – Officer recommendation: accept in part

⁹ Support – Forest and Bird [FS78] – Officer recommendation: accept

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested (Summary)	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
LIGHT-R1							
275.46	Waka Kotahi	LIGHT-R1	Retain LIGHT-R1 as notified.	N/A	Accept	The submissions are all in support of the rule.	No
284.283	CIL	LIGHT-R1	Retain LIGHT-R1 as notified.	N/A			
303.46	Fire and Emergency New Zealand	LIGHT-R1	Retain LIGHT-R1 as notified.	N/A			
326.443	RIDL	LIGHT-R1	Retain LIGHT-R1 as notified.	N/A			
419.154 ¹⁰	Department of Conservation	LIGHT-R1	Retain LIGHT-R1 as notified.	N/A			
LIGHT-R2							
284.284	CIL	LIGHT-R2	Retain LIGHT-R2 as notified.	N/A	Accept	The submissions are all in support of the rule.	No
326.444	RIDL	LIGHT-R2	Retain LIGHT-R2 as notified.	N/A			
419.155 ¹¹	Department of Conservation	LIGHT-R2	Retain LIGHT-R2 as notified.	N/A			
LIGHT-R3							
275.47	Waka Kotahi	LIGHT-R3	Retain LIGHT-R3 as notified.	N/A	Accept	The submissions are all in support of the rule.	No
284.285	CIL	LIGHT-R3	Retain LIGHT-R3 as notified.	N/A			
326.445	RIDL	LIGHT-R3	Retain LIGHT-R3 as notified.	N/A			
419.128 ¹²	Department of Conservation	LIGHT-R3	Retain LIGHT-R3 as notified.	N/A			
LIGHT-S1							
169.27 ¹³ ¹⁴	NZPork	LIGHT-S1	Delete LIGHT-S1 as it relates to new sites and new road corridors.	3.6.1	Reject	See the relevant section of the report.	No
275.48	Waka Kotahi	LIGHT-S1	Clarify how LIGHT-S1 applies to roads and controls the effects of light spill onto roads and why this standard is appropriate to apply to roads (if that is the case).	3.6.1	Reject	See the relevant section of the report.	No
284.286	CIL	LIGHT-S1	Retain LIGHT-S1 as notified.	3.6.1	Accept	The submission point supports the standard.	No
295.107 ¹⁵	HortNZ	LIGHT-S1	Delete LIGHT-S1 relating to new sites and road corridors.	3.6.1	Reject	See the relevant section of the report.	No
326.446	RIDL	LIGHT-S1	Retain LIGHT-S1 as notified. <i>Note: This was incorrectly summarised as LIGHT-S2 in the summary of submissions and was renotified in the summary of submissions errata.</i>	3.6.1	Accept	The submission point supports the standard.	No
Table LIGHT-1							
68.15	Canterbury District Health Board	Table LIGHT-1	Retain Table LIGHT-1 Light Spill Limits by Zone Illuminance Lux for the Special Purpose Zone (Hospital) as notified.	N/A	Accept	The submission point supports the light spill limits.	No

¹⁰ Support – Forest and Bird [FS78] – Officer recommendation: accept

¹¹ Support – Forest and Bird [FS78] – Officer recommendation: accept

¹² Support – Forest and Bird [FS78] – Officer recommendation: accept

¹³ Support – Federated Farmers [FS83] – Officer recommendation: reject

¹⁴ Oppose – Waka Kotahi [FS110] – Officer recommendation: accept

¹⁵ Oppose – Waka Kotahi [FS110] – Officer recommendation: accept

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested (Summary)	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to Proposed Plan?
LIGHT-S2							
169.28 ¹⁶	NZPork	LIGHT-S2	Delete LIGHT-S2 as it relates to existing sites, roads, footpaths and cycle paths.	3.6.2	Reject	See the relevant section of the report.	No
275.49	Waka Kotahi	LIGHT-S2	Amend LIGHT-S2: "1. Any fixed outdoor lighting shall be: ..."	3.6.2	Reject	See the relevant section of the report.	No
284.287	CIL	LIGHT-S2	Retain LIGHT-S2 as notified.	3.6.2	Accept	The submission point supports the standard.	No
295.108 ¹⁷	HortNZ	LIGHT-S2	Delete LIGHT-S2 as it relates to existing sites, roads, footpaths and cycle paths.	3.6.2	Reject	See the relevant section of the report.	No
326.447	RIDL	LIGHT-S2	Retain LIGHT-S2 as notified.	3.6.2	Accept	The submission point supports the standard.	No
LIGHT-AN1							
275.50	Waka Kotahi	LIGHT-AN1	Retain LIGHT-AN1 as notified.	N/A	Accept	The submission point supports the advice note.	No
LIGHT-MD1							
275.51	Waka Kotahi	LIGHT-MD1	Retain LIGHT-MD1 as notified.	N/A	Accept	The submission points support the matter of discretion.	No
284.288	CIL	LIGHT-MD1	Retain LIGHT-MD1 as notified.	N/A			
326.448	RIDL	LIGHT-MD1	Retain LIGHT-MD1 as notified.	N/A			
419.129 ¹⁸	Department of Conservation	LIGHT-MD1	Retain LIGHT-MD1 as notified.	N/A			

¹⁶ Oppose – Waka Kotahi [FS110] – Officer recommendation: accept

¹⁷ Oppose – Waka Kotahi [FS110] – Officer recommendation: accept

¹⁸ Support – Forest and Bird [FS78] – Officer recommendation: accept

Appendix C. Report Author's Qualifications and Experience

I hold a Master of Planning (First Class Honours) from Lincoln University, and a Bachelor of Arts from University of Canterbury.

I am an Intermediate Member of the New Zealand Planning Institute.

I have been employed as a Policy Planner at Waimakariri District Council within the Development Planning Unit since 2016. During this time, I have been involved in all stages of the District Plan Review (District Plan effectiveness analysis, issues and options analysis, chapter drafting, preparation of section 32 evaluation reports, public consultation and engagement, and summarising submissions). I was specifically involved in the development of the Light, Noise, Hazardous Substances, Contaminated Land, Earthworks, and Temporary Activities Chapters.

I also processed resource consents while working at the Christchurch City Council on a casual contractual basis for 18 months.