

Dunedin City District Plan
PROPOSED DISTRICT PLAN CHANGE 13
Hazardous Substances

Summary of Decisions Requested

11 February 2012

The first stage of the process for Proposed Plan Change 13 provided an opportunity for anyone to make a submission, subject to clauses 6(2) to 6(4) of the First Schedule of the Resource Management Act 1991 ('the Act'). The period for making submissions closed on 12 December 2011. A summary of decisions requested by persons making submissions is contained in this document.

This is the second stage of the process for Proposed Plan Change 13. Under clause 8 of the First Schedule of the Act, this stage provides an opportunity for the following parties to make a further submission either supporting or opposing a submission or submissions already made:

- any person representing a relevant aspect of the public interest;
- any person who has an interest in the proposed plan change that is greater than that of the general public; and
- the Dunedin City Council itself.

This second stage does not provide another opportunity to make new submissions on the Plan Change itself, as a further submission can only relate to a submission that has already been made.

Please refer to the original submissions for full details. Copies of the original submissions are available for public inspection at:

- Planning Enquiries, First Floor, Civic Centre, 50 The Octagon, Dunedin
- Public Libraries at Dunedin, Mosgiel, Port Chalmers, Blueskin Bay (Waitati) and Waikouaiti

Further submissions should be made in writing and sent to the Dunedin City Council using one of the following options:

Post to: City Development Manager, Dunedin City Council, PO Box 5045, Dunedin
Deliver to: Planning Enquiries, Plaza, Civic Centre, 50 The Octagon, Dunedin
Fax to: 474 3451 (if you fax your submission, please post or deliver a copy to one of the above addresses)
E-mail to: planning@dcc.govt.nz
Submit online at: www.dunedin.govt.nz

The further submission must be in Form 6 of the Resource Management (Forms, Fees and Procedure) Regulations 2003 or similar, and must state whether or not you wish to be heard on your submission. Copies of this form are available from Planning Enquiries and at public libraries, can be downloaded from www.dunedin.govt.nz or will be mailed to you if you phone 477 4000, or email klindsay@dcc.govt.nz.

The further submission period closes on Friday 5 March 2012.

The process for public participation in the consideration of the proposed plan change under the Act is as follows:

- if a submitter asks to be heard in support of their submission, a hearing must be held;
- the Council will give its decision on the proposed plan change (including its reasons for accepting or rejecting submissions); and
- anyone who has made a submission has the right to appeal the decision on the proposed plan change to the Environment Court.

Please note that if you make a further submission, you must provide a copy of it to the original submitter(s) that you have opposed or supported within five working days of making the submission. The contact details of original submitters are provided in the table overleaf. For further information please telephone Kirstyn Lindsay on 477 4000, or email klindsay@dcc.govt.nz.

List of Submitters

Submitter Number	Submitter Name	Organisation	Address1	Address2	City	Post code
PC-13-1	Mr Scott Kunac	Allan Millar's Hunting & Fishing	52 Tirohanga Road	RD 2	Mosgiel	9092
PC-13-2	Mr Glen Miller		5 Canberra Place	Waldronville	Dunedin	9018
PC-13-3	Mr David Holdsworth		35 Greenacres Street	Macandrew Bay	Dunedin	9014
PC-13-4	Mr Lindsay Strong		29 Church Street		Mosgiel	9024
PC-13-5	Mr Stewart Bayne	Antique Arms Association Otago Branch	68 Skibo Street	Kew	Dunedin	9012
PC-13-6	Mr Philip Cregeen	New Zealand Antique & Historical Arms Association Inc.	57A Riverside Drive	Riverside	Whangarei	0112
PC-13-7	Mrs Joanne Bayne	Antique Arms Association Otago Branch	68 Skibo Street	Kew	Dunedin	9012
PC-13-8	Mr Ross Dungey		109 Benhar Road	RD 2	Balclutha	9272
PC-13-9	Dr John Osborne		PO Box 52		Kaitaia 0441	
PC-13-10	Mr John Fooks	Dunedin Clay Target Club Inc	20A Brighton Road	Green Island	Dunedin	9018
PC-13-11	Mr Chaz Forsyth		70 Evans Street	Opoho	Dunedin	9010
PC-13-12	Mr Tim Cleminson	Dunedin Clay Target Club Inc	PO Box 2001	South Dunedin	Dunedin	9044
PC-13-13	Mr Selwyn Smith		10 Buckingham Street		Dunedin	9016
PC-13-14	Ms Dianne Brown	New Zealand Deer Stalkers' Association Incorporated	PO Box 6514	Marion Square	Wellington	6141
PC-13-15	Mr Paul Clark	New Council of Licensed Firearms Owners Incorporated (COLFO)	PO Box 24020	Manners Street	Wellington	6142
PC-13-16	Ms Adrienne Sears	New Zealand Clay Target Association Inc.	PO Box 5355	Papanui	Christchurch	8542
PC-13-17	Mr Stuart Hayman	New Zealand Service Rifle Association Inc	PO Box 12450	Penrose	Auckland	1642
PC-13-18	Otago-Southland Firearm Owners Coalition C/O Chaz Forsyth	Otago-Southland Firearm Owners Coalition	70 Evans Street	Opoho	Dunedin	9010
PC-13-19	Bruce Rifle Club (Inc) C/O Chaz Forsyth	Bruce Rifle Club (Inc)	70 Evans Street	Opoho	Dunedin	9010
PC-13-20	Dr Lech Beltowski	Sporting Shooters Association of NZ (SSANZ)	PO Box 41013	St Lukes	Auckland	1346
PC-13-21	Mr Andrew Keene		28C Maitland Street		Dunedin	9016

PC-13-22	Mr Jay MacLean		469 Henley Road	RD 1	Outram	9073
PC-13-23	Mr Simon Van Westoby		7 Maryhill Terrace	Mornington	Dunedin	9011
PC-13-24	Mr Paul Horsman	Otago Branch (Inc) New Zealand Deerstalkers' Association	PO Box 701		Dunedin	9054
PC-13-25	Mr Evan Johnston		14 Shand Street	Green Island	Dunedin	9018
PC-13-26	Mr Steve Kilby		5 Heenan Road	RD 1	Outram	9073
PC-13-27	Ms Ellen Kilby		5 Heenan Road	RD 1	Outram	9073
PC-13-28	Mr Alec Cassie	Wenita Forest Products	PO Box 341		Mosgiel	9053
PC-13-29	Mr Barry Mackay Attn Katrina Roos	Property Services	University of Otago	PO Box 56	Dunedin	9054
PC-13-30	Mr Tony Parata		1113 Coast Road	RD 1	Waikouaiti	9471
PC-13-31	Mercy Hospital Dunedin Limited Attn Joanne Dowd	Mercy Hospital Dunedin Limited	C/O Mitchell Partnerships Limited	PO Box 489	Dunedin	9054
PC-13-32	Mr Chris Keenan	Horticulture New Zealand	PO Box 10232	The Terrace	Wellington	6143
PC-13-33	Mr Peter Gilbert	LPG Association of New Zealand	PO Box 1776		Wellington	6140
PC-13-34	Ms Joanna Pollard		PO Box 35		Outram	9062
PC-13-35	Mr Lincoln Coe	Port Otago Limited	PO Box 8		Port Chalmers	9050
PC-13-36	Mr Greg Sneath	New Zealand Fertiliser Manufacturers Research Association Incorporated	PO Box 11519	Manners Street Central	Wellington	6142
PC-13-37	Mr Grant Anderson	Holcim (New Zealand) Limited	PO Box 6040	Upper Riccarton	Christchurch	8442
PC-13-38	Mr Kevin Thompson	Downer EDI Works Limited	133 Main South Road	Green Island	Dunedin	
PC-13-39	Mr Murray Mackenzie	Ravensdown	PO Box 16081	Hornby	Christchurch	8441
PC-13-40	Ms Laura Marra	TrustPower Limited	Private Bag 12023	Tauranga Mail Centre	Tauranga	3143
PC-13-41	Ms Janet Connochie	Chemsafety Limited	PO Box 8141		Christchurch	8440
PC-13-42	Mr Jonathan Green	Fulton Hogan Limited	Private Bag 11900	Ellerslie	Auckland	1542
PC-13-43	Kim Reilly	Federated Farmers of New Zealand	PO Box 5242	Moray Place	Dunedin	9058

Guide to the Summary of Submissions

Submissions on Plan Change 13 have been summarised and arranged to facilitate further submissions. The submissions have been arranged by the provision in the plan change to which they relate, so that submissions relating to each provision can be easily found. Individual submissions have been provided with reference numbers such as PC-13-2 (or Plan Change 13/Submitter 2). Where a submission relates to a number of different provisions a further reference has been added, for example PC-13-2/a, PC-13-2/b etc.

How the summary is organised

The summary has been organised as follows:

<u>Provision to which the submission relates</u>	<u>Summary begins on page:</u>
Whole of plan change	6
Amendments to Section 3: Definitions	9
Rule 17.5.1 Permitted Activities	9
Rule 17.7.2	13
Table 17.1 Class 1 thresholds	13
Table 17.1 Class 2 thresholds	18
Table 17.1 Class 3 thresholds	18
Whole of Table 17.1	18
Policy 17.3.8 and Methods 17.4.1 and 17.4.7	20

Proposed Plan Change 13: Hazardous Substances

Summary of Decisions Requested

Submitter Name	Submitter Number	Provision	Submission Summary	Decision Sought from Dunedin City Council	Wish to be Heard
Mr Tony Parata	PC-13-30	Whole of Plan Change	The submitter opposes the use of thresholds/consents to regulate the storage and use of hazardous substances because there are now comprehensive HSNO controls. The submitter opposes the disposal of hazardous substances being a permitted activity.	<p>To remove thresholds for agrichemicals within the rural and rural/residential zone as it is provided for by HSNO.</p> <p>To remove thresholds for above ground fuel storage within the rural and zone as it is provided for by HSNO.</p> <p>For all activities covered by ERMA approved codes of practice or guidelines provided for by HSNO to be permitted activities unless HSNO regulations are proven inadequate for a particular site.</p> <p>To impose controls on the disposal of hazardous substances.</p>	Yes
Mercy Hospital Dunedin Limited	PC-13-31	Whole of Plan Change	The submitter is concerned that because they are located within the Residential 1 zone the thresholds are lower than they may otherwise be. The submitter accepts that they will retain existing use rights but is concerned that any change to their operation may threaten those rights. The submitter is concerned that all proposed thresholds relevant to the submitter are being reduced.	Opposes the thresholds set in proposed Table 17.1 and seeks thresholds which accommodate its operation without the need for resource consent	Yes
Mr Chris Keenan Horticulture New Zealand	PC-13-32	Whole of Plan Change	<p>The submitter supports the intent of the plan change but considers that it is too complex and believes that it duplicates HSNO regulations.</p> <p>The submitter considers its members must already meet stringent standards and that the District Plan controls are unnecessary.</p> <p>The submitter supports the removal of the</p>	<p>Seeks clarification around the purpose of Method 17.4.2 and proposes amendments which specify that the Hazardous Substances Register be limited to consented activities.</p> <p>Method 17.4.5 to include liaising with other agencies such as the EPA,</p>	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

			<p>'Hazardous Facilities Screening Procedure'.</p> <p>The submitter requests that all activities covered by NZS8409 or which comply with the HSNO requirements for the on-farm storage of Class 3 fuels in the rural zone are provided for as permitted activities.</p>	<p>Dept of Labour, ministry of Health, Ministry for the Environment and affected landowners.</p> <p>Supports the deletion of the 'Hazardous Facilities Screening Procedure' from Method 17.4.6 but seeks to retain the reference to industry codes of practice.</p> <p>Seeks that all activities covered by NZS8409 or which comply with the HSNO requirements for the on-farm storage of Class 3 fuels in the rural zone are provided for as permitted activities or seeks that Plan Change 13 be withdrawn and gap analysis be undertaken to identify the specific resource management issues in the city which are not addressed by HSNO regulations and therefore require specific provisions within the District Plan.</p>	
Mr Lincoln Coe Port Otago Limited	PC-13-35	Whole of Plan Change	<p>The submitter considers that the proposed plan change is complex, duplicative and unnecessary, given the current regulatory environment to manage effects of hazardous substances. The submitter considers that the entire plan change be revised with greater reliance on the HSNO regime as a means of implementation.</p> <p>The submitter believes that hazardous substances in transit or short term storage should be exempt from the District Plan requirements and regulated under HSNO.</p> <p>The submitter seeks for the Port 1 Zone at Port Chalmers to be exempt from the thresholds contained in Table 17.1</p>	<p>Remove all hazardous substances thresholds from the District Plan and rely on HSNO Regulations (Group Standards) to manage generic effects; or</p> <p>Exempt Port 1 Zone from the thresholds contained in Table 17.1 subject to conditions.</p> <p>Port 2 Zone should be included within the zones which may use sub-facilities to calculate the permitted threshold limit. The application of sub-facility should be clarified.</p> <p>Thresholds contained in Table 17.1 as they apply to the Port 2 Zone</p>	Yes

Proposed Plan Change 13: Hazardous Substances

Summary of Decisions Requested

			Given the industrial nature of the Port 2 Zone, the submitter wishes the Port 2 Zone to be included within those zones which may use sub-facilities to calculate the permitted thresholds limit.	should be revised. Exclude hazardous substances in transit or short term storage from the definition of hazardous substances.	
Ms Laura Marra TrustPower Limited	PC-13-40	Whole of Plan Change	<p>The submitter generally supports the Plan Change as it seeks to ensure the District Plan is in line with the Hazardous Substances and New Organisms Act 1996 (HSNO) requirements.</p> <p>The submitter is concerned that the proposed changes to the District Plan will impose restrictions that are more stringent than required by the HSNO standards.</p> <p>The submitter is concerned that there does not seem to be consistency between the quantities of hazardous substances that trigger key requirements (threshold quantities) under the HSNO legislation and the limits for hazardous substances that are permitted activities in the proposed Plan Change.</p> <p>The submitter seeks justification from the Council as to how the permitted quantity limits were identified. If it is determined that the thresholds have been developed to ensure alignment with the HSNO obligations, then the submitter will support the thresholds.</p>	In addition to the concerns raised regarding the thresholds contained in Table 17.1, the submitter also seeks changes to be made to proposed Objective 17.2.2, Policy 17.3.8, Method 17.4.2, Method 17.4.5, and Method 17.4.6.	Yes
Mr Jonathan Green Fulton Hogan Limited	PC-13-42	Whole of Plan Change	The submitter supports the alignment of the District Plan with HSNO but feels that the proposed plan change fails to do this. They request that the plan change be withdrawn and rewritten to align with HSNO thresholds and re-notified.	Withdraw Plan Change	Yes
Ms Janet Connochie	PC-13-41/a	Definitions	The submitter generally supports the Plan	Clarify definition of Hazardous	No

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

Chemsafety Limited			<p>Change as it seeks to ensure the District Plan is in line with the Hazardous Substances and New Organisms Act 1996 (HSNO) requirements.</p> <p>However, the submitter is concerned that the definition of Hazardous Substances may not be clear.</p>	Substance to reference "Hazardous Substance (Minimum Degrees of Hazard) Regulations"	
Federated Farmers	PC-13-43/b	Definitions	The submitter is concerned that where the District Plan requires a resource consent application for a quantity of substance HSNO otherwise permits, this introduces costly and unnecessary, onerous and impractical consent requirements. This level of control is not consistent with current HSNO regulations and requirements.	That the farm scale use and storage of agrichemicals and fertilisers be excluded from the definition of hazardous facilities and therefore be exempt for the hazardous substance rules where the substance is only intended for on farm use.	Yes
Mr Peter Gilbert LPG Association of New Zealand	PC-13-33/a	Amend Rule 17.5.1.	<p>The submitter considers that the District Plan rules duplicate HSNO.</p> <p>The submitter seeks clauses (iv)(v)(vi)(vii) of Rule 17.5.1 to be removed from the rule and included within a user guide.</p>	Amend clauses (iv)(v)(vi)(vii) of Rule 17.5.1	Yes
Mr Greg Sneath New Zealand Fertiliser Manufacturers' Research Association Incorporated	PC-13-36/a	Amend Rule 17.5.1	<p>The submitter acknowledges Council has an obligation to avoid, remedy, or mitigate any adverse effects associated with the storage, use, disposal, or transportation of hazardous substances.</p> <p>The submitter is concerned that proposed Rule 17.5.1 will require resource consent for farmers who routinely apply fertiliser such as a superphosphate mix or urea. This will introduce unnecessary, onerous and impractical consent requirements and be unworkable for City Council officers and farmers alike.</p>	<p>Permitted Activity status for on-farm storage and use of fertiliser products.</p> <p>Conditions of permitted activity status which are consistent with the HSNO Fertiliser Group Standards.</p> <p>Adopt consequential changes to words and references within proposed Chapter 17.</p>	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

			The submitter considers that proposed rule is inconsistent with the HSNO Act, it's associated Regulations, and the requirements specified in the HSNO Fertiliser (Subsidiary Hazard) Group Standard 2006.		
Mr Grant Anderson Holcim (New Zealand) Limited	PC-13-37/a	Amend Rule 17.5.1	<p>The submitter wishes to ensure that:</p> <ul style="list-style-type: none"> • Unintended consequences do not arise through the adoption of this Plan Change; • Perverse outcomes do not arise through the implementation of the Proposed Plan Change; • The Port 2 Zone is recognised as an industrial area which holds or stores significant quantities of material; • Cement, Burnt Lime and Hydrated Lime are provided for within the Plan; and • The submitter's customers are not adversely affected by the proposed plan change. <p>The submitter applauds the approach which Dunedin City Council has taken to ensure consistency with the Hazardous Substances and New Organisms Act (in terms of definitions of products).</p> <p>However, the submitter is concerned that the Port 2 zone has been excluded where it would be expected to contain hazardous substances.</p> <p>The submitter is also concerned that the proposed plan change may result in any of its new customers needing to obtain consent to hold the submitters product.</p> <p>The submitter seeks recognition of cement, burnt lime, hydrated lime and limestone chip in the Dunedin City Plan (as provision has been given to other materials).</p> <p>Amendments should be made to ensure that the District Plan has some 'sensitivity factor'.</p>	<p>Support Rule 17.5.1 (i) - Permitted Activities providing the following words are included ... <i>The product must be stored in the container <u>or</u> <u>packaging</u> in which it was sold...</i></p> <p>Support Rule 17.5.1 (iii) and (iv) providing those activities included in 17.5.1(i) are exempt.</p> <p>Support Rule 17.5.1 (vi) providing the Port 2 zone is included.</p> <p>Propose that a further clause is added to Rule 17.5.1 which states: <i>Where any new facility is constructed, and a Test Location Certificate or Stationary Container Certification is required, it is deemed that the certified environmental controls are considered adequate. If no Test Location Certificate or Stationary Container Certification is supplied, resource consent will be required under rule 17.5.2, 17.5.3 or 17.5.4 of this Plan.</i></p>	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

Mr Kevin Thompson Downer EDi Works Limited	PC-13-38	Amend 17.5.1	Rule	<p>The submitter generally supports Plan Change 13 given its objective is to better align the District Plan's management of Hazardous substances with the Hazardous Substances and new organisms Act (HSNO).</p> <p>The submitter considers that the plan Change could result in a situation where a facility or sub facility may require both a Location Test Certificate and a resource consent. This is considered an unnecessary duplication and will impose additional and unnecessary costs and delays on site owners and operators.</p> <p>The submitter therefore considers that the following change should be made to Rule 17.5.1(iv): ...under Rule 17.5.2, 17.5.3 or 17.5.4 of this plan unless a Location Test Certificate has been issued for the quantity.</p> <p>The submitter also considers Rule 17.5.1(vi) should be amended in a similar manner, as follows: ...under Rule 17.5.2, 17.5.3 or 17.5.4 of this plan unless a Location Test Certificate has been issued for each hazardous sub-facility.</p>	Amend Rules 17.5.1(iv) and (vi).	Yes
Mr Murray Mackenzie Ravensdown	PC-13-39/a	Amend Rule 17.5.1		<p>The submitter seeks to ensure that</p> <ul style="list-style-type: none"> • Rural activities operating in compliance with the HNSO Act, ACVM Act, and associated regulations are not disadvantaged by the adoption of this Plan Change; • The manufacture and storage of fertiliser and associated products is not disadvantaged or prevented by the adoption of the Plan Change. • The import and export of fertiliser and associated products through the Port is recognised • Unforeseen outcomes do not arise through the implementation of the 	<p>The following points be added to Rule 17.5.1:</p> <ul style="list-style-type: none"> • Use or storage of a hazardous substance is a permitted activity if the activity is located in the Rural Zones • Use or storage of a hazardous substance is a permitted activity if the activity is located in the Industrial Zones • Use or storage of a hazardous substance is a permitted activity if the 	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

			<p>Proposed Plan Change, such as unreasonable hurdles for the production of, or use of, new products.</p> <p>The submitter requests that activities in the Rural, Industrial and Port zones that are in compliance with the national HSNO framework are included as "Permitted Activities".</p>	<p>activity is located in the Port Zones.</p> <p>The wording of 17.5.1 (iii) may not be clear enough. Consider the addition of "Unless provided for in 17.5.1 (i) and (ii)" to this point.</p> <p>The overall wording of District Plan "17 – Hazardous Substances" could be confusing as to whether or not the proposed rules apply to each substance singularly or substances falling within each HSNO class and sub-class in sum/aggregate.</p>	
Ms Janet Connochie Chemsafety Limited	PC-13-41/b	Amend Rule 17.5.1	The submitter seeks explanation on Rule 17.5.1(i) and seeks to broaden the Rule 17.5.1(ii).	Seeks explanation on Rule 17.5.1(i) and seeks to broaden the Rule 17.5.1(ii).	No
Federated Farmers of New Zealand	PC-13-43/a	Amend Rule 17.5.1	<p>The submitter has concerns specifically as the Plan Change relates to</p> <ul style="list-style-type: none"> • Agrichemical storage and use; • Fertiliser storage and use; • Fuel storage and use (above and below ground). • <p>The submitter notes that farmers have legal obligations under the HSNO Act in relation to the safe handling and storage of hazardous substances on farms, substances which are integral to day to day farming activities.</p> <p>The submitter advises that the Code of Practice HSNOCOP 3-1 NZS8409:2004 relates to the Management of Agrichemicals and is the main source of information for safe, responsible and effective agrichemical use.</p> <p>The submitter advises that under the Fertilisers (Subsidiary Hazard) Group Standard 2006</p>	<p>Adopt rules permitting agrichemical use, storage, transportation and disposal where NZS8409:2004 is complied with.</p> <p>Specifically refer to the Fertiliser (Subsidiary Hazard) Group Standard as the applicable standard for the storage and use of fertiliser; and/or</p> <p>Adopt rules permitting fertiliser use, storage, transportation and disposal where the Group Standard is complied with; and/or.</p> <p>Amend Rule 17.5.1 (v) by including those activities which comply with group standards as permitted activities.</p> <p>Adopt rules permitting matters</p>	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

			<p>(HSR002571) any new hazardous substance that fits the specified criteria is automatically deemed an approved substance.</p> <p>The submitter advises that ERMA provides significant guidance to farmers to ensure they meet their obligations regarding both below ground and above ground fuel storage and that, in addition to the HSNO Act and regulations, there are also approved HSNO Codes of Practice providing further guidance and rules</p> <p>The submitter considers that the Group Standard and Codes of Practice provide clear, in-depth and detailed information and guidelines on very specific topics. The submitter believes that these Standard and Codes should be given due weight within any applicable District Plan provision.</p>	<p>where FertResearch's Code of Practice for Nutrient Management 2007 is complied with.</p> <p>Where requirements under HSNO rules, regulations, Group Standards, approved Codes of Practice and quantity thresholds are being met, that any Council plan requirement should align with those in a permitted activity framework; or</p>	
Mr Peter Gilbert LPG Association of New Zealand	PC-13-33/b	Amend Rule 17.5.2	The submitter seeks that Rule 17.5.2 (i)(b) be deleted.	Clause (i)(b) to be deleted from Rule 17.5.2.	Yes
Mr Scott Kunac Allan Millar's Hunting & Fishing	PC-13-1	Amend Table 17.1 Class 1 thresholds	The submitter is concerned that the proposed thresholds will adversely affect his business and seeks the ability to store more realistic quantities of 1.4S Safety Ammunition	To increase the amount of 1.4S safety ammunition to be stored.	Yes
Mr Glen Miller	PC-13-2	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and wishes to see the same Class 1 thresholds imposed as Auckland, Wellington and Christchurch Councils.	To increase the amount of Class 1 explosive to be stored at residential locations.	No
Mr David Holdsworth	PC-13-3	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules. The submitter requests that Class 1.4S threshold be set at 25kg, 15kg for Class 1.3C and Class 1.1D be set at 5kg.	Supports Classes 1.1D and 1.3C thresholds but wishes Class 1.4S threshold to be increased to 25kg.	Yes
Mr Lindsay Strong	PC-13-4	Amend Table 17.1 Class 1	The submitter seeks a plan change which would relax existing District Plan rules and align the	To increase the amount of 1.4S safety ammunition to be stored to	Yes

Proposed Plan Change 13: Hazardous Substances

Summary of Decisions Requested

		thresholds	rules with HSNO. The submitter requests that Class 1.4S threshold be set at 25kg to be in line with HSNO and with the rest of the country.	25kg.	
Mr Stewart Bayne Antique Arms Association Otago Branch	PC-13-5	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that thresholds are in line with HSNO.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	No
Mr Philip Cregeen New Zealand Antique & Historical Arms Association Inc.	PC-13-6	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that thresholds are in line with HSNO.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	No
Mrs Joanne Bayne Antique Arms Association Otago Branch	PC-13-7	Amend Table 17.1 Class 1 thresholds	The submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that thresholds are in line with HSNO. It is also requested that net explosive quantity (NEQ) be used as the unit of measure for these quantities.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg and that net explosive quantity (NEQ) be used as the unit of measure for these quantities.	No
Mr Ross Dungey	PC-13-8	Amend Table 17.1 Class 1 thresholds	The submitter was concerned about the lack of consultation and considered that the Council failed to identify a problem with the amount of ammunition currently allowed to be stored under the existing District Plan. The submitter believes that 15kg is an arbitrary figure. The submitter believes that his existing limits are set by HSNO. The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO and would like Dunedin City Council to follow other Councils and use HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

Dr John Osborne	PC-13-9	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that thresholds are in line with HSNO.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	No
Mr John Fooks Dunedin Clay Target Club Inc	PC-13-10	Amend Table 17.1 Class 1 thresholds	<p>The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that thresholds are in line with HSNO.</p> <p>It is also requested that net explosive quantity (NEQ) be used as the unit of measure for these quantities. The Submitter also requests details of conditions which may be imposed upon his club should they require to relocate to new premises.</p>	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	No
Mr Chaz Forsyth	PC-13-11	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council follows other Councils and use HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes
Mr Tim Cleminson Dunedin Clay Target Club Inc	PC-13-12	Amend Table 17.1 Class 1 thresholds	The Submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO and requests that Class 1.4S threshold be set at 25kg to be in line with HSNO and with the rest of New Zealand.	To increase the amount of 1.4S safety ammunition to be stored to 25kg.	Yes
Mr Selwyn Smith	PC-13-13	Amend Table 17.1 Class 1 thresholds	<p>The Submitter believes that the proposed thresholds will negatively affect competitive shooters and hunters within Dunedin City.</p> <p>The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.4S threshold be set at 25kg to be in line with HSNO and with the rest of New Zealand.</p>	To increase the amount of 1.4S safety ammunition to be stored to 25kg.	Yes

Proposed Plan Change 13: Hazardous Substances

Summary of Decisions Requested

Ms Dianne Brown New Zealand Deer Stalkers' Association Incorporated	PC-13-14	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council follows other Councils and use HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes
Mr Paul Clark New Council of Licensed Firearms Owners Incorporated (COLFO)	PC-13-15	Amend Table 17.1 Class 1 thresholds	The submitter believes that Class 1.4S is one of the safest products people can possess and that the proposed thresholds will negatively impact on the shooting sports within the Dunedin City area. The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO.	Asks for Council not to adopt the proposed thresholds in relation to Class 1.4S explosive.	Yes
Ms Adrienne Sears New Zealand Clay Target Association Inc.	PC-13-16	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council follows other Councils and use HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	No
Mr Stuart Hayman New Zealand Service Rifle Association Inc	PC-13-17	Amend Table 17.1 Class 1 thresholds	<p>The Submitter is concerned that this plan change will be setting an undesirable precedent. The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO.</p> <p>The submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council follows other Councils and use HSNO limits when setting class 1 thresholds.</p>	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes
Otago-Southland Firearm Owners Coalition	PC-13-18	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council follows other Councils and use HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes
Bruce Rifle Club (Inc)	PC-13-19	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council follows other Councils and use HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes

Proposed Plan Change 13: Hazardous Substances

Summary of Decisions Requested

Dr Lech Beltowski Sporting Shooters Association of NZ (SSANZ)	PC-13-20	Amend Table 17.1 Class 1 thresholds	The submitter believes that the proposed plan change is unwarranted. The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes
Mr Andrew Keene	PC-13-21	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with other major councils within New Zealand. The submitter requests that Class 1.4S threshold be set at 25kg to be in line with Auckland, Wellington and Christchurch.	To increase the amount of 1.4S safety ammunition to be stored to 25kg.	No
Mr Jay MacLean	PC-13-22	Amend Table 17.1 Class 1 thresholds	The submitter considers that ammunition and reloading powders offer no significant increase in risk when compared to other household items. The submitter believes the thresholds are too low and would disadvantage many sportsmen and women, hunters and collectors. The submitter seeks clarification regarding the unit of measure for explosive class and considers that there would significant difficulty is accurately calculating net explosive quantity. The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.4S threshold be set at 25kg to be in line with HSNO and with the rest of New Zealand.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	No
Mr Simon Van Westoby	PC-13-23	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.4S threshold be set at 25kg to be in line with HSNO and with the rest of New Zealand.	To increase the amount of 1.4S safety ammunition to be stored to 25kg.	Yes
Mr Paul Horsman Otago Branch (Inc) New Zealand Deerstalkers' Association	PC-13-24	Amend Table 17.1 Class 1 thresholds	The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council uses HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

Mr Evan Johnston	PC-13-25	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The submitter requests that Class 1.4S threshold be set at 25kg to be in line with HSNO and with the rest of New Zealand.	To increase the amount of 1.4S safety ammunition to be stored to 25kg.	No
Mr Steve Kilby	PC-13-26	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council uses HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	No
Ms Ellen Kilby	PC-13-27	Amend Table 17.1 Class 1 thresholds	The submitter seeks a plan change which would relax existing District Plan rules and align the rules with HSNO. The Submitter requests that Class 1.1D be set at 15kg, Class 1.3C be set at 15kg and Class 1.4S be set at 25kg so that Dunedin City Council uses HSNO limits when setting class 1 thresholds.	To increase proposed thresholds of Class 1.1D to 15kg, and Class 1.4S to 25kg and for Class 1.3C to remain at the proposed 15kg.	No
Mr Peter Gilbert LPG Association of New Zealand	PC-13-33/c	Amend Table 17.1 Class 2 thresholds	The submitter seeks for the outdoor storage limits for LPG to be deleted from Table 17.1 and replaced with Total Storage Quantities with thresholds similar to that used by other major urban territorial authorities. The submitter wishes all indoor storage limits for LPG to be deleted from Table 17.1	Parts of Table 17.1 to be deleted and parts amended.	Yes
Mr Alec Cassie Wenita Forest Products	PC-13-28	Amend Table 17.1 Class 3 thresholds	The submitter supports the proposed thresholds for Petrol 3.1A and Diesel 3.1D and consider that the proposed thresholds will not unnecessarily restrict his forestry operation.	Accept Table 17.1 as it relates to Classes 3.1A and 3.1D.	No
Mr Barry Mackay University of Otago	PC-13-29	Amend Table 17.1	The submitter acknowledges that the majority of its concerns were addressed during the pre-consultation stage of the plan change process and, as such, the focus of its submission relates mainly to the threshold limits detailed in proposed Table 17.1.	Amend the thresholds included in Table 17.1 as it relates the Campus Zone.	No

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

Mr Greg Sneath New Zealand Fertiliser Manufacturers' Research Association Incorporated	PC-13-36/b	Amend Table 17.1	<p>The submitter advises that the HSNO Fertiliser Group Standards were produced following extensive consultation with all stakeholders and set out conditions that enable this group of hazardous substances to be managed safely to protect human health and the environment, and with the end user in mind.</p> <p>The Fertiliser Industry contends that all local authority (regional, district, city and unitary) hazardous substances policy and rules must be consistent with the Hazardous Substances and New Organisms (HSNO) Act 1996 and associated regulations.</p>	Deletion of Table 17.1 and reference to HSNO Group Standards as applicable or exempt fertiliser use and storage by farmers from Table 17.1 with a permitted activity status based on complying with HSNO Fertiliser Group Standards.	Yes
Ms Janet Connochie Chemsafety Limited	PC-13-41/c	Amend Table 17.1	<p>The submitter is concerned that there does not seem to be consistency between the quantities of hazardous substances outlined in Table 17.1 and the risks posed by that substance.</p> <p>The submitter seeks specific changes to the thresholds and explanations associated with several of the classes listed in Table 17.1</p>	Specific changes required to Table 17.1.	No
Mr Murray Mackenzie Ravensdown	PC-13-39/b	Amend Table 17.1	<p>The submitter seeks to ensure that</p> <ul style="list-style-type: none"> • Rural activities operating in compliance with the HNSO Act, ACVM Act, and associated regulations are not disadvantaged by the adoption of this Plan Change; • The manufacture and storage of fertiliser and associated products is not disadvantaged or prevented by the adoption of the Plan Change. • The import and export of fertiliser and associated products through the Port is recognised • Unforeseen outcomes do not arise through the implementation of the Proposed Plan Change, such as unreasonable hurdles for the production of, or use of, new products. 	Correct inconsistencies in Table 17.1.	Yes

Proposed Plan Change 13: Hazardous Substances Summary of Decisions Requested

Mr Grant Anderson Holcim (New Zealand) Limited	PC-13-37/b	Amend Table 17.1	<p>The submitter wishes to ensure that:</p> <ul style="list-style-type: none"> • Unintended consequences do not arise through the adoption of this Plan Change; • Perverse outcomes do not arise through the implementation of the Proposed Plan Change; • The Port 2 Zone is recognised as an industrial area which holds or stores significant quantities of material; • Cement, Burnt Lime and Hydrated Lime are provided for within the Plan; and • The submitter's customers are not adversely affected by the proposed plan change. 	<p>Seeks changes to the thresholds contained with Table 17.1 as they relate to Class 6.4A - Eye Irritants.</p> <p>Seeks changes to the thresholds contained with Table 17.1 as they relate to Class 6.5A and B - Respiratory and contact sensitisers.</p> <p>Seeks changes to the thresholds contained with Table 17.1 as they relate to Class 8.2A-C Substances corrosive to skin.</p> <p>Seeks changes to the thresholds contained with Table 17.1 as they relate to Class 8.3A Substances corrosive to the eye.</p> <p>Seeks clarification on the treatment of materials with a 9.1A-D classification (along with other HSNO classifications). The submitter applauds the practice of different vessels having different thresholds.</p>	Yes
Ms Joanna Pollard	PC-13-34	Policy 17.3.8 Method 17.4.1 Method 17.4.7	The submitter suggests amendments to the methods and policies, specifically in respect of natural hazards.	<p>Include hazards to the environment including flora and fauna, natural and introduced to Method 17.4.1 – Hazard Register.</p> <p>Add the words "hazards to social wellbeing and economy" to Policy 17.3.8.</p> <p>Strengthen Method 17.4.7.</p>	Yes