

**SUBMISSIONS ON THE
PROPOSED KAIPARA DISTRICT PLAN**

TO:

Kaipara District Council (**Council**)
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Via email: districtplanreview@kaipara.govt.nz

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1. INTRODUCTION

Ravensdown Limited – Overview and Interests in the Kaipara District

- 1.1 Ravensdown Limited (**Ravensdown**) is a farmer owned co-operative. Ravensdown's goal is to enable smarter farming for a better New Zealand. Given this goal, Ravensdown provides products, namely fertiliser and agrochemicals (agrichemicals), expertise and technology to help farmers reduce environmental impacts and to optimise value, or outputs, from land.
- 1.2 Ravensdown, in deciding whether to participate in district council planning processes, considers whether the district plan, or proposed plan change, will achieve the purpose of the Resource Management Act 1991 (**RMA**) while also evaluating whether the planning provisions will unduly constrain its own activities (i.e., manufacturing, store sites and quarries) and/or the users of their products (i.e., its farming shareholders).
- 1.3 In this context, the nature of Ravensdown's interests within Kaipara include its bulk store at 14 Day Street in Dargaville.
- 1.4 Given the above context, the provisions of the Proposed Kaipara District Plan (**PDP**) are of interest to Ravensdown, particularly as the PDP has implications for its ongoing operations within the Kaipara District.
- 1.5 Therefore, in preparing this submission, Ravensdown seeks to ensure that the future district planning processes that will apply to its Dargaville store (located within a Light Industrial Zone (**LIZ**) under the PDP), recognise the nature of its operations, and provides for these activities to continue, intensify and expand. While endeavouring to ensure that the PDP provides for its activities, Ravensdown also recognises that the PDP provisions need to provide for the sustainable management of Kaipara land resources, and that any adverse effects of activities, including from Ravensdown's operations, are avoided, remedied or mitigated.

Overview of Submission

- 1.6 Ravensdown's submission, given its interests within the District and the potential implications that the PDP may, or will, have on its activities at its Dargaville store, generally supports the PDP in terms of its goal to provide a framework for the use, development and subdivision of the District's land resource, while also putting in place controls to manage and protect the area's natural and physical resources.
- 1.7 Ravensdown supports the PDP approach to providing a framework that permits a range of activities, particularly activities located in appropriate zones, given that zoning is a fundamental concept for the effective and efficient managing of an area's land resource. Ravensdown also supports many of the proposed controls or restrictions that apply to these permitted activity rules, given the role that they play in ensuring that potential adverse effects on people, the community and the environment are appropriately managed.
- 1.8 However, through this submission, Ravensdown also seeks amendments that provide for the continued use and development of the industrial zoned land by industrial activities, including by facilities that use, store and disposal of hazardous substances. Ravensdown have invested significantly in its Dargaville store and requires security and confidence that this site can continue to operate, and that they also have the ability to be able to make future decisions on investment and/or the nature of operations at the Dargaville store without undue constraint. District planning provisions are instrumental in providing for this security and confidence in terms of its land use activities. Given this context, Ravensdown, through this submission, seek greater support through the PDP to enable the continued operation and expansion of their activities to meet the future needs of their store.

1.9 Ravensdown's submission on the PDP is structured as follows:

- (a) General comments, namely in relation to one area of concern, are overviewed in **Section 2** of this submission;
- (b) Specific submission points on PDP provisions are contained in the table provided in **Attachment A**; and
- (c) A conclusion, including the overarching reasons for the submission, is provided in **Section 3**.

2. GENERAL COMMENTS ON THE PROPOSED KAIPARA DISTRICT PLAN

2.1 Ravensdown is supportive of the proposed zoning of its Dargaville store (LIZ) and the associated LIZ provisions. Ravensdown, except for the hazardous submission provisions of the PDP, is also generally supportive of the provisions of the PDP.

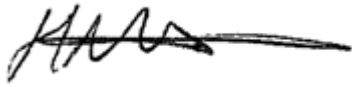
Area of Concern – Hazardous Substance Provisions of the PDP

- 2.2 The PDP, as notified, includes rules, and related provisions, that seek to manage activities that use, store and dispose of hazardous substances. Ravensdown considers that the proposed regulatory framework unnecessarily duplicates the Hazardous Substances and New Organisms Act 1996 (**HSNO**) and the Health and Safety at Work (**HSW**) Act 2015 Act, and associated regulations. Ravensdown considers that there is no compelling reason for the proposed duplication of regulatory control of 'hazardous facilities', particularly where such activities are appropriately located, such as is the case with Ravensdown's Dargaville store (which is located in the LIZ).
- 2.3 In addition, based on Ravensdown's review of district plan provisions around New Zealand, the hazardous substances regulatory approach contained in the PDP is considered to be out of step with the approach tending to be adopted in new district plans (i.e., no or limited rules, but with a objectives and policies to guide decision-making where an activity that uses, stores or disposes of hazardous substances requires a land use consent).
- 2.4 Given these concerns, Ravensdown, within **Attachment A** of this submission, has requested a number of amendments to the hazardous substance related provisions of the PDP so as to appropriately address the regulatory duplication currently inherent in the PDP.

3. CONCLUSION

- 3.1 Ravensdown generally supports the PDP, subject to the amendments requested within the submission points contained in **Attachment A**. In relation to the provisions that Ravensdown has raised concerns about within its submission points, those provisions require amendments because, without amendment, those provisions:
 - (a) will not enable the efficient use and development of Ravensdown's assets and operations; and
 - (b) do not represent the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- 3.2 Ravensdown could not gain an advantage in trade competition through this submission.
- 3.3 Ravensdown wishes **to be heard** in support of its submissions.
- 3.4 If others are making a similar submission, Ravensdown will consider presenting a joint case with them at the hearing.

Date: 30 June 2025



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Hannah Mollison

Consultant Planner

Authorised to sign this submission on behalf of Ravensdown Limited

ATTACHMENT A – RAVENSDOWN LIMITED’S SUBMISSION ON THE PROPOSED KAIPARA DISTRICT PLAN

REF.	PDP PROVISION	SUPPORT / OPPOSE	COMMENTS / REASONS FOR RELIEF SOUGHT	RELIEF REQUESTED
PART 1 – INTRODUCTION AND GENERAL PROVISIONS				
Interpretation / Definitions				
1.	Hazardous Facility	Oppose in part	<p>The definition of ‘hazardous facility’ is as follows:</p> <p><i>Means activities involving hazardous substances and premises at which these substances are used, stored or disposed of. Storage includes vehicles for their transport located at a facility for more than short periods of time and excludes:</i></p> <ul style="list-style-type: none"> • <i>fuel stored in mobile plants,</i> • <i>motor vehicles, boats and small engines;</i> • <i>the incidental use and storage of hazardous substances in domestic scale quantities;</i> <p><i>activities involving sub-classes not included in the Activity Status Table.</i></p> <p>Ravensdown opposes this definition, in part, on the basis that it appears to encompass both ‘activities’ and ‘premises’ and lacks clarity. Ravensdown considers that a ‘facility’ should refer to an area/premises rather than an activity, particularly as the definition itself then describes the ‘activity’ i.e., the use, storage and disposal of hazardous substances.</p> <p>In addition, the following aspects of the definition lack clarity and should be deleted:</p> <ul style="list-style-type: none"> - The reference to vehicles’ storing hazardous substances, for more than a short period of time, is not needed. The definition includes the storage of hazardous substances at a premise, irrespective of the type of storage. - The final line of the definition refers to ‘<i>activities involving sub-classes not included in the Activity Status Table</i>’. It is unclear which ‘Activity Status Table’ is being referred to, although it is 	<p>Amend the notified definition of ‘Hazardous Facilities’ as follows:</p> <p><i>Means activities involving hazardous substances and premises at which these hazardous substances are used, stored or disposed of, but Storage includes vehicles for their transport located at a facility for more than short periods of time and excludes:</i></p> <ul style="list-style-type: none"> • <i>fuel stored in mobile plants,</i> • <i>motor vehicles, boats and small engines;</i> • <i>the incidental use and storage of hazardous substances in domestic scale quantities;</i> <p><i>Activities involving sub-classes not included in the Activity Status Table.</i></p>

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			assumed that it is referring to the activities listed in DEF1 . The inclusion of this sentence in the definition, which is unclear, is also unnecessary (i.e., it adds nothing to the definition).	
2.	Significant Hazardous Facility	Oppose	<p>A 'significant hazardous facility', based on the PDP's definition, is any site where the HS-S1 quantities, in aggregate, are exceeded. This definition, particularly in the context of the PDP's subsequent regulatory framework, creates unnecessary confusion and regulatory overlap with Hazardous Substances and New Organisms Act 1996 (HSNO) and the Health and Safety at Work (HSW) Act 2015, and associated regulations. The definition is also inconsistent with the evaluative process required under the Health and Safety at Work (Major Hazard Facilities) Regulations 2016 (MHF Regulations) to determine whether or not a facility is a MHF (plus the process for determining lower or upper tier MHFs).</p> <p>Given the controls in place under HSNO, HSW and various regulations, there is no need for additional regulatory control on the storage and use of hazardous substances under the PDP. For these reasons, the deletion of this definition is requested, as well as the deletion of this term from the associated HS objectives and policies (as traversed below within this submission).</p>	<p>Delete the notified definition of 'Significant Hazardous Facilities' in its entirety as follows:</p> <p><i>means a site where the aggregate quantity of any hazardous substance of any hazard classification on the site exceeds the quantity specified for the applicable zone in Standard HS-S1 in the Hazardous Substances chapter of this plan.</i></p> <p>AND,</p> <p>Consequential amendments throughout the PDP.</p>
PART 2 – DISTRICT-WIDE MATTERS				
Hazards and Risks / HS - Hazardous Substances				
3.	Overview	Oppose in Part	<p>The overview section of the HS chapter states that the role of the PDP is to support the regulation of hazardous substances, which are regulated under HSNO and HSW. Ravensdown supports this statement, as it is implied that the key legislation is the HSNO and HSW, and associated regulation, and any PDP rules should be supportive of, and not duplicate, these regulations.</p> <p>However, Ravensdown opposes the final paragraph which refers to the need for the PDP to control the quantities of hazardous substances, and thus to 'assist' other legislation which manages</p>	<p>Amend the HS Overview, by deleting the final paragraph as follows:</p> <p>Overview</p> <p><i>Hazardous substances include...</i></p> <p>...</p> <p><i>The rules control quantities of defined hazardous substances classes that are significant enough to potentially pose a</i></p>

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			<p>hazardous substances.</p> <p>Ravensdown considers that including hazardous substances control in the PDP is unnecessary regulatory duplication and does not provide any assistance with meeting other regulatory requirements. For this reason, Ravensdown, through this submission, is seeking various changes to the PDP's HS provisions to remove this unnecessary regulatory duplication and thus burden. Therefore, Ravensdown also requests the deletion of the final paragraph of the HS chapter 'Overview'.</p>	<p>significant risk to public safety and the environment with respect to the various zones across the Kaipara District. The sites where such activities take place are defined as significant hazardous facilities. These provisions assist other legislation in the management of hazardous substances in significant quantities, taking location into account.</p>
4.	HS-O1: Risks associated with hazardous substances	Support	<p>The following proposed objective (HS-O1) is included in this chapter of the PDP:</p> <p><i>Hazardous substance use, storage, transport and disposal activities are located, designed and managed, so that the risk to people, property and the environment is acceptable, while recognising the benefits of those activities.</i></p> <p>Ravensdown supports this objective as it is agreed that hazardous substances have the potential, if not appropriately controlled and managed, to pose a risk to people, property and the environment. In addition, the retention of this objective, as requested by Ravensdown, will enable consideration to be given to this objective (and the HS policy framework generally) where a new activity or development, that does use, store or dispose of hazardous substances, needs to seek a land use consent (as triggered by rules in other chapters of the PDP).</p>	Retain HS-O1 as notified.
5.	HS-O2: New sensitive activities	Support	<p>The following proposed objective (HS-O2) is included in this chapter of the PDP:</p> <p><i>Established activities using, storing or disposing of hazardous substances are not compromised by new sensitive activities.</i></p> <p>Ravensdown supports this objective as existing and established activities that use, store and dispose of hazardous substances, particularly where such activities are appropriately located, should</p>	Retain HS-O2 as notified.

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			not be put at risk (i.e., constrained) by new sensitive activities. In saying this, it is noted that PDP zone provisions, particularly for industrial activities appropriately located in industrial zones, should be in place to ensure that sensitive activities are managed to ensure that they do not give rise to reverse sensitivity effects on industrial activities in industrial zones. For this reason, specific rules in this chapter of the PDP, in response to this objective, are not necessary.	
6.	HS-P1: Hazardous facilities	Support in part	HS-P1 aims to minimise the risks to the environment, people and property that may arise from new or expanded hazardous facilities, with considerations outlined in the policy including siting, design, construction, operation and how hazardous wastes are disposed of. The policy is supported as it identifies appropriate measures around new and expanded hazardous facilities, and the disposal of hazardous wastes. It is appropriate that the matters outlined in this policy are considered where a new activity or development, that uses, stores or disposes of hazardous substances, needs to seek a land use consent (as triggered by rules in other chapters of the PDP). However, given the requested deletion of the definition of 'significant hazardous facilities' (Ref. 2 above), a consequential amendment to Clause (1) of this policy is required.	Amend HS-P1 as follows: <i>Hazardous facilities must minimise the risk to the environment (including people and property) by:</i> 1. <i>Siting new significant hazardous facilities in appropriate locations that are separated from incompatible activities, such as sensitive land use and infrastructure, and sensitive environments;</i> 2. <i>Designing, constructing and operating hazardous facilities in a manner that ensures the adverse effects of the operation or an accidental event involving hazardous substances can be contained within the site; and</i> 3. <i>Disposing hazardous wastes to authorised disposal or treatment facilities that have appropriate management systems in place and avoiding the storage, processing or disposal of hazardous wastes in sensitive environments.</i>
7.	HS-P2: Assessment of risk	Oppose	HS-P2 aims to ensure that the potential adverse effects associated with new or expanded hazardous facilities are appropriately	Delete HS-P2 in its entirety as follows: <i>Ensure facilities for the use, storage or</i>

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			<p>identified, assessed and managed to acceptable levels of risk to human health, safety, property and the environment.</p> <p>Ravensdown considers that this policy is unnecessary, particularly as it effectively duplicates the matters of consideration and management addressed at a national level by HSNO and HSW, and associated regulations. In this context, and given proposed HS-P1, this policy adds nothing additional to the matters of consideration where a new activity or development, that uses, stores or disposes of hazardous substances, needs to seek a land use consent (as triggered by rules in other chapters of the PDP). For this reason, Ravensdown requests that this policy is deleted.</p>	<p>disposal of hazardous substances in significant quantities identify and assess potential adverse effects (including cumulative risk and potential effects of identified natural hazards) to prevent unacceptable levels of risk to human health, safety, property and the natural environment.</p>
8.	HS-P3: Reverse sensitivity effects	Support in part	<p>HS-P3, in support of proposed HS-O2, aims to avoid reverse sensitivity effects arising for lawfully-established significant hazardous facilities.</p> <p>As outlined above in relation to HS-O2 (Ref. 5), Ravensdown supports the intent of this policy where it seeks to ensure that reverse sensitivity effects do not arise in relation to lawfully-established hazardous facilities (i.e., including activities located in appropriate zones, such as the Dargaville which is appropriately located within the LIZ).</p> <p>While supporting this policy, Ravensdown also acknowledges that zone provisions, particularly for industrial activities appropriately located in industrial zones, should be in place to ensure that sensitive activities are managed so they do not give rise to reverse sensitivity effects on industrial activities in industrial zones.</p> <p>However, given the requested deletion of the definition of 'significant hazardous facilities' (Ref. 2 above), a consequential amendment to this policy is required.</p>	<p>Amend HS-P3 as follows:</p> <p><i>Avoid as far as practicable reverse sensitivity effects from sensitive land use activities on lawfully-established significant hazardous facilities.</i></p>
9.	HS-R1: The use, storage or disposal of any hazardous substances	Oppose	<p>Ravensdown opposes this rule on the basis that the PDP regulatory framework for the use, storage and disposal of hazardous substances creates unnecessary confusion and regulatory overlap</p>	<p>Amend HS-R1 as follows:</p> <p><i>Activity status: Permitted</i></p> <p><i>Where:</i></p>

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			<p>with HSNO and HSW, and associated regulations.</p> <p>The proposed HS objectives and policies, subject to the amendments being sought, seek to ensure that activities that store and use hazardous substances (e.g., including industrial activities) are appropriately located and that appropriate controls and management systems are in place. It is considered that the zone provisions, in conjunction with consideration of the proposed HS policy framework, ensure that activities that use and store hazardous substances are appropriately located, while compliance with HSNO and HSW, and associated regulations, ensures that the risks associated with the use and storage of hazardous substances are controlled, managed and mitigated. Therefore, a permitted activity rule for these activities within all relevant zones is appropriate.</p> <p>An alternative permitted activity is therefore proposed, which permits the storage, use and disposal of hazardous substances, unless otherwise specified in the PDP.</p>	<p>The aggregate quantity of any hazardous substance of any hazard classification on a site does not exceed the quantity specified for the applicable zone in HS-S1.</p> <p><u>The storage, use and disposal of hazardous substances not otherwise specified within the 'Hazardous Substances' chapter rules.</u></p>
10.	HS-R3: Fertiliser storage	Oppose	<p>This rule effectively relates to 'on-farm' storage of fertiliser products, which are regulated under the HSNO and HSW, and associated regulations. Including this rule in the PDP, creates unnecessary confusion for the district's rural community, and unnecessarily duplicates regulatory requirements with no specific benefit for the environment (or reduction of adverse effects or risks). For this reason, Ravensdown requests the deletion of this rule.</p> <p>However, if this rule along these lines were to be retained, Ravensdown considers that the rule should be placed in the rural zone provisions of the PDP (i.e., zone provisions apply to activities using, storing and disposing of hazardous substances, with the HS policy framework providing guidance on activities that need a land use consent). If such a rule was to be placed in the rural zone provisions of the PDP, Conditions (a) and (c) should be deleted as:</p>	<p>Delete HS-R3 in its entirety as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>a. Fertiliser is temporarily stored for rural production activities and is classed as sub-class 6.3, 6.4 and 6.5; and</p> <p>b. The storage location is more than 30m from a watercourse; and</p> <p>c. the duration of the storage does not exceed 28 days within any 12 month period; and</p> <p>d. The substance stored is intended for rural production use and not for retail sale.</p>

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			the hazardous substance classifications are not needed (i.e., the rule would apply to the storage of fertiliser); and, the time limit restriction is not relevant if the fertiliser is being stored safely and effectively (e.g., in one of Ravensdown's on-farm silos).	
11.	HS-R4: Use, storage and disposal of hazardous substance subclasses 1.4, 1.5, 1.6, 6.1D, 6.1E, 9.1D and 9.2D	Oppose	Ravensdown opposes this rule as the use, storage and disposal of hazardous substances are regulated under the HSNO and HSW, and associated regulations, and thus the rule is considered unnecessary as it creates unnecessary confusion and regulatory overlap. Also, Ravensdown has requested amendments to HS-R1 (Ref. 9 above) which would permit the use, storage and disposal of all hazardous substances unless specified in the PDP. It is considered that the requested HS-R1 approach is a more logical means, compared to specifying a range of hazardous substances classifications, of permitting the use, storage and disposal of hazardous substances throughout the district.	Delete HS-R4 as follows: <i>Activity status: Permitted</i> <i>Where:</i> <i>The hazardous substance is in subclasses 1.4, 1.5, 1.6, 6.1D, 6.1E, 9.1D and 9.2D.</i>
12.	HS-S1: Standards	Oppose	Ravensdown requests that HS-S1 is deleted in its entirety. This is because, as explained above, controls on hazardous substances are implemented under the HSNO and HSW, and associated regulations. It is considered this standard, in conjunction with the notified rules of PDP, creates unnecessary regulatory duplication of hazardous facilities. In addition, based on Ravensdown's review of district plan provisions around New Zealand, the HS regulatory approach contained in the PDP is considered to be out of step with the approach tending to be adopted in new district plans (i.e., no or limited rules, but with a objectives and policies to guide decision-making where an activity that uses, stores or disposes of hazardous substances requires a land use consent).	Delete HS-S1 in its entirety.

REF.	PDP PROVISION	SUPPORT / OPPOSE	COMMENTS / REASONS FOR RELIEF SOUGHT	RELIEF REQUESTED
District Wide Matters / Hazards and Risks / NH – Natural Hazards				
13.	NH-P6: Manage subdivision and development in that may be affected by flood hazards and overland flow	Support	Ravensdown supports this policy, specifically NH-P6.3(c), as it is considered appropriate to design storage and containment areas for hazardous substances to be protected from flood risk.	Retain NH-P6 as notified.
14.	NH-P7: Manage subdivision and development in coastal erosion hazard areas and coastal flood hazard areas	Support	Ravensdown supports this policy, specifically NH-P7.3, as it is considered appropriate to design storage and containment areas for hazardous substances to be protected from flood risk.	Retain NH-P7 as notified.
15.	NH-R12: Significant hazardous facility in a coastal erosion hazard area, coastal flood hazard area, or river flood hazard area	Oppose	<p>This rule is opposed due to the significant and unnecessary consenting requirements that would be imposed on existing and proposed hazardous facilities if the rule is implemented. It is considered inappropriate to impose a blanket non-complying activity status on hazardous facilities (significant or otherwise), as this does not recognise that correct storage and risk management of hazardous facilities can suitably mitigate risks from natural hazards.</p> <p>This rule is also inconsistent with the NH-P6 and NH-P7 (Refs. 13 and 14 above). These policies provide for containment and storage of hazardous substances if these are designed to mitigate inundation of 1 in 100-year flood events. The NH rules specifically require minimum floor levels of new or altered buildings to be above the 100-year ARI flood event, which directly achieves the intent of these policies. Also, HSNO and HSW, and associated regulations, require the safe storage of hazardous substances.</p> <p>There are matters of discretion within proposed NH-R1 –to NH-R4 which relate to the storage and use of hazardous substances, and any associated management/mitigations, if a new or altered building does not achieve the permitted activity conditions (including minimum floor levels). Again, HSNO and HSW, and associated regulations, contain requirements for the safe storage of hazardous substances that will ensure the appropriate management and</p>	<p>Delete NH-R12 in its entirety as follows:</p> <p><i>NH-R12: Significant hazardous facility in a coastal erosion hazard area, coastal flood hazard area, or river flood hazard area—Non-Complying Activity.</i></p>

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			mitigation of risk. Overall, this 'non-complying' rule is duplicative and unnecessary, and is inconsistent with the policies of the NH chapter of the PDP. Finally, Ravensdown has requested the deletion of the proposed definition for 'significant hazardous facilities' (Ref. 2 above) and therefore, the use of this term is also opposed.	
District Wide Matters / Historical and Cultural Values / Sites and Areas of Significance to Māori				
16.	SASM-P6: Activities within a scheduled site	Support	Ravensdown supports this policy, particularly SASM-P6.3, as it is considered that locating hazardous facilities within a scheduled site is inappropriate.	Retain SASM-P6 as notified.
17.	SASM-R7: Landfills, waste disposal facilities, significant hazardous facilities and offensive industries	Support in part	Ravensdown agrees that it is inappropriate to locate hazardous facilities within sites and areas of significance to Māori, and thus non-complying activity status for such activities in these areas and sites is appropriate. However, as Ravensdown has requested the deletion of the proposed definition for 'significant hazardous facilities' (Ref. 2 above), the use of this term in the rule is subsequently opposed.	Amend SASM-R7 as follows: <i>Landfills, waste disposal facilities, significant hazardous facilities and offensive industries.</i>

APPENDIX 1 – FIGURES

Figure 1.1 – Ravensdown Limited’s landholding at its Dargaville Store (at 14 Day Street) (outlined in black and white)

