

**Further Submission in Support of, or in Opposition to the Mackenzie District
Plan Change 23 & 27**

To: Mackenzie District Council

This is a further submission in support of, or in opposition to, a submission on the **Mackenzie District Plan Change 23 & 27**.

Full name of person making the further submission:

Port Blakely Limited

Organisation name and contact (if representing a group or organisation):

Shona Walter, Saunders & Co.

Only certain persons can make a further submission. Please select the option that applies:

I am a person who has an interest in the proposal that is greater than the interest the general public has.

Please explain why you come within the category selected above: Port Blakely Limited filed a submission on the Mackenzie District Plan Change 23 & 27 regarding the matters addressed in this further submission.

Hearing Options

Yes, I wish to be heard in support of my further submission.

Yes, if others make a similar further submission, I will consider presenting a joint case with them at a hearing.

Signature: **Date:** 28 February 2024

Shona Walter

Electronic address for service of person making further submission: shona.walter@saunder.co.nz

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Postal address (or alternative method of service under s.352 of the Act):

131 Victoria Street, P.O Box 18, Christchurch 8140

Contact person: Shona Walter, Saunders & Co.

Yes, I have served a copy of the further submission on the original submitter, as required under the RMA Schedule 1, s.8A(2).

Name of person making further submission: Port Blakely Limited						
This further submission is in relation to the original submission of:	This further submission is in relation to the original submission Number:	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is:	The reasons for my/our support/opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
PF Olsen	PC23 Point 24.07	Support submission in its entirety	Support	Forestry Activities are regulated by the NES-CF and includes a shelterbelt definition.	Allow	Amend definition as suggested by submitter.
PF Olsen	PC23 Point 24.08	Support submission: "Delete this definition and any further reference in the district plan "	Support in part	Specifying wilding conifers is a regional council function under Regional Pest Management Plans.	Allow	Amend the plan as detailed to remove any reference to Wilding Conifer Species in the district plan, as this is a regional council function under the regional pest management plans.
PF Olsen	PC23 Point 24.14	Support amending Table NATC-1: "To exclude commercial forestry activities from this provision, as they are regulated by the NES-CF."	Support	The setbacks under the NES-PF are an effective setback for waterways, there is no valid reason for including a stricter requirement under the Plan.	Allow	Amend to exclude commercial forestry activities from the provisions.
PF Olsen	PC23 Point 24.11	NATC-R2 Support amending rule: "To include another exception for	Support	The proposed setbacks are inconsistent with commercial forestry earthworks as per regulation 29 of the NES-CF.	Allow	Amend NATC-R2 to align with the standards contained in the NES-CF and/or include an exception for earthworks related to commercial forestry activities.

		commercial forestry earthworks as they are regulated by the NES-CF.”				
Forest and Bird	PC23 Point 36.07	NFL-R10 Oppose submission: “Retain NC status in ONL and ONF. Change RDIS for FMA to NC.”	Oppose	The FMA provisions are there to assess the visual amenity impact of commercial forestry and the activity status and matters of discretion in the provisions as notified adequately manage those potential impacts - aside from removing reference to wilding conifer species in condition (d).	Disallow	Making the activity status more restrictive would not be more efficient or effective in achieving the purpose of the rule NFL-R10.
Opuha Water Limited	PC23 Point 43.11	GRUZ-R13 Oppose submission: “Extension of the GRUZ-R13, condition 4, to include consideration of effects on renewable electricity generation facilities.”	Oppose	Wording of the submission is too vague. The effects of commercial forestry upon water quantity is regulated by the Canterbury Land and Water Regional Plan, in particular the rules relating to Flow Sensitive Catchments. Unnecessary for duplication of rules in this area.	Disallow	Disallow the submission insofar it seeks to include provisions in the plan relating to water quantity.
Director-General of Conservation	PC23 Point 7.10	Oppose amendment to the Zone Purpose wording: “The General Rural Zone prioritises provides for primary production and activities that support primary production,	Oppose	Unnecessary, retain as notified, as this better reflects the higher order documents.	Disallow	Disallow the suggested amendments.

		and also provides for other activities where they rely on the natural resources found only in a rural location.”				
Director-General of Conservation	PC23 Point 7.11	Oppose changes suggested to GRUZ-P2, as follows: “Recognise the importance of primary production activities to the economic wellbeing of the district, and prioritise provide for primary production and activities which support primary production, within the General Rural Zone, by:...”	Oppose	The use of highly productive soils is governed by the NPS-HPL	Disallow	The NPS-HPL Reg 2.2 states that highly productive land is protected for use in land-based production. According to the NPS-HPL, land based primary production includes forestry activities. Furthermore, it should be the market which decides which what kind of land based primary production occurs within a certain area of highly productive land.
Director-General of Conservation	PC27 Point 7.09	Oppose submission: “Revise these rules and standards to effectively and consistently manage silt and sediment loss from earthworks.”	Oppose	The Regional Council regulates the water quality of rivers & other water bodies. It is for the Canterbury Land & Water Regional Plan to define quality standards for water bodies and the appropriate mixing zones for discharge of sediment into water bodies.	Disallow	Unnecessary duplication, already regulated under the Canterbury Land & Water Regional Plan.

Department of Conservation	PC23 Point 109.016	Oppose changes to the definition of significant natural area: “Widening the definition of a SNA to include: “For the avoidance of doubt, a SNA also includes areas meeting the criteria outlined in Appendix 4 that may not yet be identified on the planning maps including those identified at the resource consent stage ...”	Oppose	Contrary to how territorial authorities should assess and identify SNAs under the NPS-IB.	Disallow	Reg 3.9 of the NPS-IB is very clear that an area only qualifies as an SNA if the SNA is included in the plan through a plan change process, which includes a map of the area and its location. This suggested wording of the submission is contrary to the function and intent of the NPS-IB, in particular Reg 3.9 on identifying SNAs and Reg 3.8 - assessing areas that qualify as SNAs.
Simpson Family Holdings	PC23 Point 16.10	Oppose submission to support GRUZ-P7 as notified.	Oppose	Wilding conifer management is controlled via the NES-CF at the establishment phase of the forest and places ongoing management requirements on landowners.	Disallow	Oppose retention of GRUZ-P7 as notified
Wolds Station Limited	PC23 Point 50.04	Support the reduction of setback distances proposed under Table NATC-1 to reflect sustainable land management and use and recognise that lawfully established existing land uses are exempt.	Support	Supports the approach which removes unnecessary duplication of rules regulating the same activity and where there are no valid reasons for including a standard stricter than an National Environmental Standard.	Allow	Allow the submission in relation to reducing setback distances to reflect sustainable land management and use and recognise that lawfully established existing land uses are exempt.
Wolds Station Limited	PC23	Support submission:	Support	The effects of commercial forestry are already regulated by	Allow	Allow the amendment of GRUZ-P7 and GRUZ-R21 to provide a

	Point 50.06	"Amend GRUZ-P7 and GRUZ-R21 to provide a pathway for Wilding Conifer planting where it would be appropriate for sound resource management practice to do so."		the NES-CF – including wilding conifer spread and the planning framework should recognise this and support landowners to manage the spread of wilding conifers.		pathway for Wilding Conifer planting where it would be appropriate for sound resource management practice to do so.
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