

Submissions on Plan Change 20 to the Mackenzie District Plan (Amended 4 October)

Submission Details

Submission Number	Submitter	Support/Oppose	Decision Requested (Amendments <u>underlined</u> and deletions struck out)	Reason/Comment	Wishes to be Heard (Y/N)
1.	New Zealand Pork	Support	Retain introduction to Chapter: ATC -A Thriving Community as notified.	Support the recognition of the district as being predominantly rural.	Yes
		Support	Retain Strategic Objective ATC-O2 as notified.	Support the recognition of the district as being predominantly rural.	
		Support with amendment	Amend Strategic Objective UFD-O1 to include a sixth clause as follows: <i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i>	Growth at the interface of townships and settlements with the rural environment can affect primary production through the loss of access to the resources required to sustain primary production and through conflict and reverse sensitivity.	

			<p><i>5. responds to the need of the community, including diversity in housing and business opportunities.</i></p> <p><i>6. responds to the rural/urban interface to maintain primary production and avoid reverse sensitivity effect.</i></p>		
2.	Heritage New Zealand	Support with amendment	Addition of an objective to promote the identification, recognition and protection of places, structures and features which are significant to Mackenzie's wider character and cultural heritage.	The omission of such an objective lessens the perceived significance of historic heritage within the Mackenzie District.	Yes
3.	Ministry of Education	Support	Retain Strategic Objective ATC –O1 as notified.	Provision for educational facilities throughout the district in urban development, will manage the impacts of development on educational facilities, in particular impacts on school capacity.	Yes
		Support in part	<p>Amend Strategic Objective UFD-O1(5) explicitly providing for educational facilities as follows:</p> <p><i>UDF-O1 Urban Form and Development</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 		

			<i>5. responds to the needs of the community, including diversity in housing and, business opportunities, and provision of educational facilities.</i>		
4.	Chorus NZ, Spark NZ and Vodafone NZ	Support	<p>Retain reference to Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 in Part One, Chapter: National Environmental Standards.</p> <p>Retain reference to Resource Management (Network Utility Operations) Regulations 2016 in Part One, Chapter: Regulations</p> <p>Retain Strategic Objective ATC-O3 as notified.</p> <p>Retain Strategic Objective ATC-O5 as notified.</p> <p>Retain Strategic Objective UFD-O1 as notified.</p>	Recognising telecommunications infrastructure in the Strategic Directions section of a District Plan is considered to be appropriate, and the manner in which Plan Change 20 seeks to introduce such measures is supported.	Yes
5.	Royal Forest and Bird Protection Society of New Zealand	Support	Retain Part One, Chapter: Definitions as notified.	Forest & Bird has an interest and appeal in regard to several definitions found in PC18 which may at some stage be rolled into the definitions section.	Yes

		<p>Support with amendment</p>	<p>Amend Part 2 Section: Strategic Directions, Introduction to:</p> <p><i>For the purposes of preparing, changing, interpreting, and implementing the District Plan, all objectives and policies in other chapters of this District Plan are to be read and achieved in a manner consistent with the strategic objectives. There is no hierarchy between the stated objectives. No one Strategic Objective has primacy over another strategic objective and the Strategic Objectives should be read as a whole.</i></p> <p><u><i>For the purpose of plan implementation (including in the determination of resource consent application and notices of requirement):</i></u></p> <p>a. <u><i>The strategic objectives in this chapter may provide guidance on what the related objectives and policies in other chapters of the Plan are seeking to achieve in relation to the Strategic Issues;</i></u></p> <p>b. <u><i>The relevant objective and policies of the plan (including Strategic Objectives and Strategic Policies in this Chapter) are to be considered together and no fixed hierarchy exists between them.</i></u></p>	<p>This wording is consistent with that used by the Environment Court in its Minute of 22 February 2019 attached as an annexure to Darby Planning Ltd Partnership v QLDC [2019] NZEnvC 133 and provides the careful wording needed as to how the strategic objectives chapter is to be interpreted with regard to the rest of the plan.</p>	
		<p>Support</p>	<p>Retain Chapter: ATC – A Thriving Community, Introduction as notified</p>		

			Retain Strategic Objective ATC-O1 as notified	
			Retain Strategic Objective ATC-O2 as notified	
			Retain Strategic Objective ATC-O3 as notified	
			Retain Strategic Objective ATC-O4 as notified	
			Retain Strategic Objective ATC-O5 as notified	
			Retain Strategic Objective MW-O1 as notified	
			Retain Strategic Objective MW-O2 as notified	
		Support with amendment	<p>Amend wording to the introduction of Chapter: NE – Natural Environment, as well as the inclusion of an additional paragraph, after the second paragraph of the introduction, as follows:</p> <p><i>The District contains many natural resources <u>some of which are of significant</u>. These <u>natural resources</u> include: resources valued by mana whenua for mahika kai; the Aoraki Mackenzie International Dark Sky Reserve; those landscapes, <u>and features that are considered outstanding and indigenous biodiversity that are is considered</u></i></p>	The amendment will give better effect to CRPS objective 9.2.1 to help stem further loss of biodiversity in the Mackenzie District.

			<p><i>significant; and the District's wetlands, lakes and rivers and their margins.</i></p> <p>New paragraph:</p> <p><u><i>It is important to maintain indigenous biodiversity that may not of itself be significant. The Mackenzie's biodiversity in general contributes to the district's social and cultural well-being. A failure to protect or maintain indigenous biodiversity could adversely affect the community's environment, social, cultural and economic well-being.</i></u></p>	
--	--	--	--	--

		<p>Support with amendment</p>	<p>Amend objective NE-01 by separating it into two objectives:</p> <p><i>NE-01 Natural Environment</i></p> <p><i>The values of the natural environment that make the District unique, contribute to its character, identity and wellbeing, and or have significant <u>or outstanding</u> intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i></p> <ol style="list-style-type: none"> 1. mahika kai resources; 2. night sky darkness; 3. outstanding natural features and landscapes; 4. significant indigenous biodiversity; and 5. water bodies and their margins <p>Then add a New NE-02 as follows:</p> <p><i>NE-02</i></p> <p><u><i>Across the District:</i></u></p> <ol style="list-style-type: none"> <u><i>1. mahika kai resources are protected and enhanced.</i></u> <u><i>2. night sky darkness is protected and enhanced.</i></u> <u><i>3. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity across the district and significant indigenous vegetation and habitats are protected.</i></u> <u><i>4. the natural character of freshwater bodies including wetlands is preserved</i></u> 	<p>Suggest that by breaking NE-01 into two objectives there will be greater clarity and will better reflect the RMA and Canterbury Regional Policy Statement.</p> <p>The suggested relief for the new NE-02 is borrowed from the proposed Waimakariri District Plan with minor adjustments supported by Forest and Bird. The night sky and mahika kai is new and not reflected in the Waimakariri Plan.</p>	
--	--	-------------------------------	--	---	--

			<p><i>or enhanced, or restored where degradation has occurred;</i></p> <p>5. <i>outstanding natural features and outstanding natural landscapes are identified, and their values recognised and protected;</i></p> <p>6. <i>people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the western ranges, and within urban environments.</i></p> <p>7. <i>land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater; and</i></p> <p>8. <i>the mauri of ecosystems and indigenous biodiversity is safeguarded, and freshwater is managed in a way that gives effect to “Te Mana o te Wai.”</i></p>	
		Support	Retain introduction to Chapter: UFD – Urban Form and Development as notified	

		Support with amendment	<p>Amend with the addition of a sixth clause to Strategic Objective UFD-O1:</p> <p><i>UDF-O1 Urban Form and Development</i></p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>5. responds to the need of the community, including diversity in housing and business opportunities; <u>and</u></i> <i>6. <u>incorporates and sustains indigenous biodiversity.</u></i> 	<p>The objectives lack recognition of the importance of indigenous biodiversity in relation to urban development. It should be clear at a strategic level within the plan that urban development and infrastructure is intended to be provided in a way that incorporates and sustains indigenous biodiversity.</p>	
6.	Federated Farmers	Support in part	<p>The section 32 evaluation, when discussing Strategic Objective ATC-O2 Rural Area, has no reference to cultural well-being, only social and economic.</p>	<p>Heritage resources can teach about the past and the cultures of those who came before. It is noted that this seldomly appropriately reflects rural or pastoral heritage and culture as 'valued'. There is an opportunity through the MDPR to celebrate the District's rural heritage and the history of the early pioneering farmers.</p>	Yes
		Support with amendment	<p>Within Part One, Section: How the Plan Works, Chapter: Statutory Context, amend</p>	<p>Amended wording is clearer.</p>	

			<p>wording in the table summarising RMA provisions, section 31 to read:</p> <p><i>Sets out MDC's functions under the RMA, which include achieving integrated management of the effects of the use, development, or protection of land and associated natural and physical resources; ensuring there is sufficient land development capacity in respect for housing and business land activities, to meeting the demands of the district; controlling the effects of the use, development, or protection of land; controlling the emission of noise and the mitigation of the effects of noise; and controlling any actual or potential effects of activities in relation to the surface of water in rivers and lakes.</i></p>		
		Support	Retain Strategic Objective ATC-02 as notified.		
7.	Genesis Energy	Support with amendment	<p>Amend the paragraph four of the introduction to Chapter: ATC - A Thriving Community and add a fifth paragraph.</p> <p><i>There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, as well as development of new</i></p>	Provide for a specific linkage between renewable energy infrastructure and contribution to reduce greenhouse gas emissions.	Yes

		<p><i>infrastructure is important to the well-being of the community of Mackenzie, Canterbury and nationally. This includes the contribution that <u>existing and new renewable electricity generation and transmission assets located in the District make to the nation.</u></i></p> <p>To be followed by a fifth paragraph:</p> <p><i><u>Part of the nationally significant Waitaki Power Scheme (WPS) is located within the district. The WPS is the largest hydro-electric power scheme in New Zealand and significantly contributes to decarbonising New Zealand's economy, mitigating the potential effects of climate change and reducing the District's reliance on non-renewable energy sources.</u></i></p>	
	Support	Retain Strategic Objective ATC-O3 as notified.	
	Support with amendment	<p>Replace Strategic Objective ATC-O4 with the following:</p> <p><i>ATC – O4 Renewable Energy The local, regional and national benefits of the District's renewable electricity generation and electricity transmission assets are recognised and their development, operation, maintenance and upgrade are provided for.</i></p> <p><i><u>Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u></i></p>	Provide explicit reference to the national significance of the Waitaki Power Scheme, including for its protection and to enable its continued use and development.

			<ul style="list-style-type: none"> a. <u>are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u> b. <u>are provided for, including their development, operation, maintenance and upgrade;</u> c. <u>are protected from reverse sensitivity effects; and</u> d. <u>provide for the current and future energy needs of the District's communities and economy.</u> 	
	Support with amendment	<p>Amend Strategic Objective UFD-O1 with an additional sixth clause:</p> <p><i>UFD-O1 Urban Form and Development</i></p> <p><i>1.is integrated into, and respects the values of the surrounding natural and physical environment;</i></p> <p><i>2.achieves good connectivity with other parts of the urban area;</i></p> <p><i>3.is supported by appropriate infrastructure;</i></p> <p><i>4.maintains the character of each township, and its attractiveness to residents, businesses and visitors;and</i></p> <p><i>5.responds to the needs of the community, including diversity in housing and business opportunities; <u>and</u></i></p> <p><i><u>6.protects significant infrastructure and activities in the District from reverse sensitivity effects.</u></i></p>	Explicitly provide for the protection of renewable electricity generation assets and activities from potential adverse reverse sensitivity effects.	

8.	Enviro Waste Services Ltd	Support with amendment	<p>Amend definition of Infrastructure in Section: Interpretation Chapter: Definitions to include additional clause:</p> <p>Infrastructure has the same meaning as in section 2 of the RMA (as set out below) means –</p> <ul style="list-style-type: none"> (a) pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy; (b) a network for the purpose of telecommunication as defined in section 5 of the Telecommunications Act 2001; (c) a network for the purpose of radiocommunication as defined in section 2(1) of the Radiocommunications Act 1989; (d) facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person – <ul style="list-style-type: none"> (a) uses them in connection with the generation of electricity for the person’s use; and (b) does not use them to generate any electricity for supply to any other person; (e) a water supply distribution system, including a system for irrigation; (f) a drainage or sewerage system; (g) structures for transport on land by cycleways, rail, roads, walkways, or any other means: 	<p>The definition for infrastructure under the RMA currently excludes waste processing and disposal facilities. Including waste processing and disposal facilities will then allow that infrastructure is ‘recognised and provided for as detailed at ATC-O3, but ensure that when established, activities which may result in reverse sensitivity effects do not establish in close proximity.</p>	Yes
----	---------------------------	------------------------	--	---	-----

			<p>(h) facilities for the loading or unloading of cargo or passengers transported on land by any means:</p> <p>(i) an airport as defined in section 2 of the Airport Authorities Act 1966:</p> <p>(j) a navigation installation as defined in section 2 of the Civil Aviation Act 1990:</p> <p>(k) facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988:</p> <p>(l) anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166</p> <p><u>(m) waste processing and disposal facilities.</u></p>		
	Support with amendment	Amend Strategic Objective ATC-O3 to include the additional sentence:	<p><i>ATC-O3 Infrastructure</i></p> <p><i>The importance of infrastructure to the District and beyond is recognised and provided for. <u>Regionally significant infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.</u></i></p>	Protect present and potential future infrastructure from reverse sensitivity.	
	Support with amendment	Amend Strategic Objective UFD-O1(3) to include the following addition:	<p><i>UFD-O1 Urban Form and Development</i></p>	This amendment is only required if the definition of infrastructure is not amended to include waste facilities, as described above.	

			<p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure <u>including waste facilities</u>;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>5. responds to the needs of the community, including diversity in housing and business opportunities.</i> 	
9.	Opuha Water Limited	Supports	<p>Council's approach to PC20 in updating the introductory chapters of the District Plan, and reframing and expanding those chapters to align with the National Planning Standards. OWL largely supports the strategic directions proposed by PC20 and the proposed strategic objectives, which it considers give appropriate recognition to renewable electricity generation and infrastructure, such as the Opuha Dam, its hydro-electric power station (HEPS) and associated assets, including irrigation scheme infrastructure located in the Mackenzie District.</p> <p>OWL seeks to ensure that there is scope to revisit aspects of PC20 should that become necessary as a consequence of future changes to other parts of the District Plan</p>	Yes

			confirmed through subsequent submission and hearing processes for plan changes notified as part of Stages 2 to 5 (inclusive) of the District Plan review.	
		Oppose in part	<p>Amend in Part One Chapter: Environmental Standards, as below:</p> <p><i>National environmental standards (NESs) are prepared by central government and can prescribe technical standards, methods (including rules) and/or other requirements for environmental matters throughout the whole country or specific areas. If an activity doesn't comply with an NES, it is likely to require a resource consent. NESs must be observed and enforced by local authorities. The following NESs are currently in force at the time of public notification of this chapter:</i></p>	Considered appropriate that the list of National Environmental Standards is noted as current at the time of public notification as opposed to "currently in force".
		Support in part	<p>Amend Chapter: ATC - A Thriving Community, introduction to read:</p> <p><i>There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, be maintained and upgraded, as well as development of new infrastructure is important to the well-being of the</i></p>	It is important that maintenance and upgrade activities required for infrastructure are considered in addition to the operation of existing infrastructure and development of new infrastructure.

			<i>community of the Mackenzie District, the Canterbury Region and nationally.</i>	
	Support	Retain Strategic Objectives ATC - O1 to O5 inclusive, as notified.		Strategic Objectives ATC- O1-O5 are appropriately framed and provide the necessary direction on strategic matters for the District.
	Oppose in part	<p>Amend Chapter: MW - Mana Whenua introduction to read:</p> <p>The following values for the Mackenzie District are sought by Mana Whenua <i>seeks the following for the Mackenzie District:</i></p> <ul style="list-style-type: none"> • Practice and protect the co-governance and co-management of natural resources and be active participants in the decision-making processes that impact the district. • Establish and achieve a high standard of environmental outcomes to protect the natural landscape for future generations. • Aim to return conservation land to a natural state where biodiversity projects can enhance the indigenous flora and fauna of the area. • Encourage customary harvesting and practices on the whenua (land), in the awa (rivers) and the moana (lakes). • Protect the whakapapa of Kati Huirapa and Moeraki. 		Consider that the matters in the bullet points of the introduction are aspirations rather than “values” and the amendment corrects this.
	Oppose in part	Retain Strategic Objective MW-O1 as notified.		While agreeing with the strategic direction, there may be situations where, depending on the time and place, carrying out customary activities could present a health and safety risk to infrastructure operation

			<p>Retain Strategic Objective MW-02 subject to the following amendment (or amendment of similar effect).</p> <p>Amend objective MW-02, point 3, as below:</p> <p><i>MW-02 Mana Whenua Involvement</i></p> <p><i>Mana whenua are able to:</i></p> <ol style="list-style-type: none"> <i>1. be actively involved in decision making that affects their values and interests;</i> <i>2. exercise their kaitiakitaka responsibilities; and</i> <i>3. carry out customary activities in accordance with tikanga where <u>reasonably practicable</u>.</i> 	<p>and/or maintenance. The amendment to MW-02 recognises this.</p>	
		<p>Oppose in part</p>	<p>Amend the introduction to Chapter – NE- Natural Environment:</p> <p><i>While these resources have intrinsic values, they are also important to the District’s social and cultural well-being in terms of the contribution they make to the District’s character and identity, and its desirability as a place to live in and visit. Many of the District’s natural resources are also significant to mana whenua and their connection with their takiwā. Economic value is derived from these natural resources, for example from tourism that is based on the natural resources within the District, and from hydro-electric power generation <u>and irrigation</u>. A failure to protect the values of these resources could adversely affect the community’s</i></p>	<p>It is appropriate for the introduction to recognise irrigation as one of the listed examples of where economic value is derived from natural resources.</p>	

			<i>environmental, social, cultural and economic well-being.</i>		
		Support	Retain Strategic Objective –NE-O1 as notified	The strategic direction provided by this objective is consistent with the directives contained in Part 2, RMA.	
10.	Pukaki Tourism Holdings Limited Partnership and Pukaki Village Holdings Limited	Support	Retain definition of “Amenity Values” in Section: Interpretation Chapter: Definitions, as notified.		No
		Support	Retain definition of “Effect” in Section: Interpretation Chapter: Definitions, as notified.		
		Support	Retain definition of “Natural and Physical Resources” in Section: Interpretation Chapter: Definitions, as notified.		
		Oppose	Amend Strategic Objective NE-O1 as follows: <i>NE-O1 Natural Environment</i> <i>The values of the natural environment that make the District unique, contribute to its character, identity and wellbeing, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with <u>These associated values are...</u></i>	This provision’s values are too vague, and the provision should clearly set out all relevant values associated with the Objective.	
		Support	Retain Strategic Objective ATC-O1 as notified.		
		Oppose	Amend Strategic Objective ATC-O2 as follows:	While the intent of the provision is generally supported, the objective needs to	

			<p><i>ATC-02 Rural Areas</i></p> <p><i>The significant contribution of rural areas to the social, economic and cultural well-being of the District is recognised and <u>a range of activities are provided for.</u></i></p>	<p>recognise that a broad array of activities can occur within the zone.</p>	
		Support	<p>Retain Strategic Objective ATC-05 as notified.</p>		

DRAFT

11.	Meridian energy Limited	Support in part	<p>Amend the paragraph four of the introduction to Chapter: ATC - A Thriving Community and add a fifth paragraph.</p> <p><i>There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, as well as development of new infrastructure is important to the well-being of the community of Mackenzie, Canterbury and nationally. This includes the contribution that <u>existing and new renewable electricity generation and transmission assets located in the District make to the nation.</u></i></p> <p>To be followed by a fifth paragraph:</p> <p><u><i>Part of the nationally significant Waitaki Power Scheme (WPS) is located within the district. The WPS is the largest hydro-electric power scheme in New Zealand and significantly contributes to decarbonising New Zealand's economy, mitigating the potential effects of climate change and reducing the District's reliance on non-renewable energy sources.</i></u></p>	<p>It is noted that the demand for renewable electricity in New Zealand continues to grow. Therefore, both existing and new renewable electricity generation infrastructure is important to the district and should be reflected in this part of PC20.</p> <p>Providing specific reference to Waitaki Power Scheme in the new paragraph will give full effect to the NPS Renewable Energy Generation.</p>	Yes
-----	-------------------------	-----------------	--	---	-----

		<p>Oppose in part</p>	<p>Replace notified ATC-O4 with new proposed ATC-O4:</p> <p><i>ATC-O4 Renewable Electricity</i></p> <p><i>The local, regional and national benefits of the District's renewable electricity generation and electricity transmission assets are recognised and their development, operation, maintenance and upgrade are provided for.</i></p> <p><u>Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u></p> <p><i>a) are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</i></p> <p><i>b) are provided for, including their development, operation, maintenance and upgrade;</i></p> <p><i>c) are protected from reverse sensitivity effects; and</i></p> <p><i>d) provide for the current and future energy needs of the District's communities and economy.</i></p>	<p>As notified, ATC-O4 does not go far enough, particularly in terms of recognising the national significance of the Waitaki Power Scheme and the need to protect the generation capacity and output of the Scheme.</p>	
		<p>Oppose in part</p>	<p>Amend Strategic Objective UFD-O1 with an additional sixth clause:</p> <p><i>UFD – O1 Urban Form and Development</i></p>	<p>There is a need to ensure that urban development does not result in reverse sensitivity on significant infrastructure.</p>	

			<p>1.is integrated into, and respects the values of the surrounding natural and physical environment;</p> <p>2.achieves good connectivity with other parts of the urban area;</p> <p>3.is supported by appropriate infrastructure;</p> <p>4.maintains the character of each township, and its attractiveness to residents, businesses and visitors;and</p> <p>5.responds to the needs of the community, including diversity in housing and business opportunities; <u>and</u></p> <p><u>6.protects significant infrastructure and associated activities in the District from reverse sensitivity effects.</u></p>		
12.	Waka Kotahi	Supports	Retain Chapter: Cross Boundary Matters, as notified.	Ensuring consistency throughout the Region is important due to the connected nature of the areas.	Yes
		Supports	Adoption of the definition of “Infrastructure”, in Section: Interpretation Chapter: Definitions, from the RMA which includes “structures for transport on land by cycleways, rail, roads, walkways, or any other means”.		
		Supports	Retain Strategic Objective ATC-01, as notified.		
		Supports	Retain Strategic Objective ATC-05, as notified.		
		Supports	Retain Strategic Objective UFD-01, as notified.		

13.	Road Metals	Neither support nor oppose	Amend Chapter: UFD - Urban Form and Development to contain wording that reflects that the Mackenzie Basin sub-zone constitutes a broad scale ONL. Further work is needed around the edges of this ONL as it currently contains land which will be needed for the growth of the district's urban centres, and in some cases does not meet the criteria for an ONL.	Much of the District is within the Mackenzie Basin sub-zone ONL. This is a broad-scale ONL and needs refinement so that areas around urban areas such as Tekapo and Twizel are not precluded or unduly constrained in terms of providing for urban growth.	Yes
14.	Environment Canterbury	Support in part	<p>Chapter: Cross Boundary Matters should focus on collaboration (as opposed to consultation) and should provide greater detail as to the process of collaboration and the tools that could be used, having regard to the matters outlined in Section 3.1 of the CRPS. The Cross Boundary Chapter also provides an opportunity to acknowledge the non-regulatory collaboration methods currently used such as the Mackenzie Basin Alignment Programme and Te Mōkihi.</p> <p>The prohibited activity status sentence within the Activity Status section of the General Approach Chapter is amended to: if the activity is permitted prohibited, you cannot proceed with the activity.</p>	The promotion of collaboration between local authorities on common resource management issues will better implement the intention of Section 18A of the RMA and the CRPS as opposed to the consultation provided for in the Cross Boundary Matters chapter.	Yes
		Support with amendment	Amend section MW3.2 to include the Hakataramea Statutory Acknowledgement Area as identified within Appendix 1 of the CRPS.	The Hakataramea River upper reach extends into the Mackenzie District but is not identified within proposed section MW3.2 of the introductory chapters.	
		Support with amendment	Retain Strategic Objective ATC-O1 clauses (1) and (3) as notified.	The amendment gives effect to CRPS Objective 5.2.1 and Policy 5.3.2 that enable people and communities to provide for	

		<p>Amend ATC-O1 point 2 to read:</p> <p><i>ATC -O1 Live, Work, Play and Visit</i></p> <ol style="list-style-type: none"> 1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 2. <i>Activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for, while <u>ensuring adverse environmental effects are managed appropriately;</u> and,</i> 3. <i>the amenity values and character of different areas are maintained or enhanced.</i> <p>Or alternatively add a new Strategic Objective that seeks:</p> <p><u><i>Avoid significant adverse effects on the environment and avoid, remedy or mitigate other adverse effects.</i></u></p>	<p>their wellbeing but requires the management of a range of environmental effects. It is also consistent with Section 5 of the RMA that includes managing adverse effects on the environment as a key component of sustainable management.</p>
	Oppose	<p>Replace Strategic Objective ATC-O2 with:</p> <p><i>ATC-O2 Rural Areas</i></p> <p>The significant contribution of rural areas to the social, economic and cultural well-being of the District is recognised and provided for.</p>	<p>As written, ATC-O2 does not explicitly refer to the natural and physical resources that underpin the contribution the rural area makes to the district's wellbeing</p>

			<u><i>The natural and physical resources of rural areas that contribute to the wellbeing of the district are maintained and enhanced.</i></u>	
	Support in part	<p>Replace Strategic Objective Act-O3 with either of the following:</p> <p><i>ATC – O3 Infrastructure</i> <u><i>The importance of infrastructure to the District and beyond is recognised and provided for.</i></u> <u><i>The importance of regionally significant infrastructure is recognised and provided for without major constraints from other activities, while managing its adverse effects.</i></u></p> <p>Or alternatively: <u><i>Regionally significant infrastructure is provided for without major constraints from other activities, while managing its adverse effects.</i></u></p>		As notified, ATC-O3 does not differentiate between significant infrastructure and less significant types of infrastructure and ATC-O3 should only recognise Regionally Significant Infrastructure. The proposed change will better give effect to Chapter 5 of the CRPS.
	Support in part	<p>Delete Strategic Objective ATC-O4 or replace with:</p> <p><i>ATC-O4 Renewable Energy</i> <i>The local, regional and national benefits of the District's renewable electricity generation and electricity transmission assets are recognised and their development, operation, maintenance and upgrade are provided for.</i> <u><i>Important renewable electricity generation and electricity transmission assets are</i></u></p>		While supporting that Strategic Objective ATC-O4 recognises the benefits of renewable energy generation and transmission, as notified there is no strategic objective that seeks to manage potential adverse effects on the environment from these activities.

			<u>provided for without major constraints from other activities, while managing their adverse effects.</u>	
	Oppose	<p>Delete and replace Strategic Objective ATC-O5 and add an additional Strategic Objective ATC-O6 as follows:</p> <p><i>ATC-O5 Adaption and resilience</i> The approach to managing resources allows the community to be resilient and adapt appropriately to change, including the effects of climate change.</p> <p><u>The effects of climate change are recognised, and an integrated management approach is adopted, that ensures:</u></p> <ol style="list-style-type: none"> 1. <u>climate change is considered in natural hazards management;</u> 2. <u>the community can adapt to climate change;</u> 3. <u>energy efficiency in urban form and settlement patterns;</u> 4. <u>energy efficient infrastructure.</u> <p><u>ATC- O6</u> <u>Natural hazard risks are addressed so that:</u></p> <ol style="list-style-type: none"> 1. <u>areas subject to natural hazard risk are identified;</u> 2. <u>development is avoided in areas where the risks of natural hazards to people, property and critical infrastructure are assessed as being unacceptable; and</u> 3. <u>for other areas, natural hazard risks are appropriately mitigated.</u> 	As notified, Strategic Objective ATC-O5 does not give effect to the CRPS direction relating to natural hazards as it does not address the breadth of matters relating to climate change and does not address natural hazards comprehensively.	

		Support	Retain Strategic Objectives MW-O1 and MW-O2 as notified.	The recognition of mana whenua, and their relationship with the district's land, water bodies, indigenous species and other sites and areas of significance is supported.
		Support with amendment	<p>Amend Strategic Objective NE-O1 as follows:</p> <p><i>NHE-O1 Natural <u>and Historic</u> Environment</i></p> <p><i>The <u>important</u> values of the natural <u>and historic</u> environment, <u>including those that make the District unique, contribute to its character, identity and wellbeing, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</u></i></p> <ol style="list-style-type: none"> <i>1. mahika kai resources;</i> <i>2. night sky darkness;</i> <i>3. outstanding natural features and landscapes;</i> <i>4. significant indigenous biodiversity; and</i> <i>5. water bodies and their margins;</i> <i>6. <u>historic heritage.</u></i> 	<p>Support recognising the natural resources and values of significance to the district.</p> <p>The amendment seeks to clarify that the words "unique- character-identity", used as criteria that the list of values must meet, are one way that important values can be identified, while allowing other criteria such as the CRPS to also be used.</p> <p>It is appropriate to include the historic environment within the strategic directions and the protection of historic heritage as it is a matter of national importance and should be restricted exclusively to the historic heritage chapter.</p>
		Support with amendments	<p>Amend Strategic Objective UFD-O1 to read:</p> <p><i>UDF-O1 Urban Form and Development</i></p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated <u>with into</u>, and respects the surrounding natural and</i> 	As notified Strategic Objective UFD-O1 does not provide for the protection of drinking water supplies or the avoidance of land uses that increase natural hazard risks. Additionally, the Proposed National Policy Statement for Highly Productive Land should be considered.

			<p><u>physical environment in a way that protects significant natural values;</u></p> <p>2. <u>achieves good connectivity with other parts of the urban areas;</u></p> <p>3. <u>avoids increasing the risk of natural hazards within high hazard areas and avoids or mitigates other hazards;</u></p> <p>3.4. <u>is integrated with the efficient and effective provision of is supported by appropriate infrastructure;</u></p> <p>4.5. <u>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</u></p> <p>5.6. <u>responds to the needs of the community, including diversity in housing and business opportunities-;</u></p> <p>7. <u>protects community drinking water supplies;</u></p> <p>8. <u>protects the life supporting capacity, health and productive capacity of highly productive land.</u></p>		
15.	Retirement Villages Association	Oppose in part	Amend Strategic Chapter ATC-O1 to ensure the planned character (not existing character) of different areas is the key consideration and to enable the housing choice needs of the community to be met.	Strategic Objective ATC-O1(3) does not recognise that amenity values and character change over time in response to changes in society and such changes are not of themselves an adverse effect. The functional and operational needs of retirement villages result in larger scale building formats than standalone housing and needs to be recognised as such.	Yes
		Oppose it part	Amend Strategic Objective UDF-O1 to include an additional clause that supports the provision of housing for the ageing population of the Mackenzie District as follows:	Retirement home resident populations are usually comprised of people that come from the immediate surrounding community. Strategic Objective UFD-O1(4) should not limit retirement living options to	

			<p><i>UDF-01 Urban Form and Development</i></p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>5. responds to the needs of the community, including diversity in housing and business opportunities.</i> <i><u>6. Recognise and enable the housing and care needs of the ageing population.</u></i> 	<p>the extent that people need to move away from their existing community in order to access more comprehensive care.</p>	
16.	Department of Conservation/ Te Papa Atawhai	Support	Retain section: Introduction of Part One as notified.	Provides a succinct and clear introduction to the Mackenzie District and the District Plan and accords with the requirements of the National Planning Standards 2019.	Yes
		Support	Retain section: How the Plan Works of Part One as notified.	Provides a clear outline of how the District Plan is to be used, and the relationship of the District Plan to other regulations; and accords with the requirements of the National Planning Standards 2019.	
		Support	Retain section: Interpretation of Part One as notified.	Accords with the requirements of the National Planning Standards 2019.	

		Support	Retain section: National Direction Instruments Statement of Part One as notified.	Accords with the requirements of the National Planning Standards 2019.	
		Support	Retain section: Mana Whenua of Part One as notified.	Accords with the requirements of the National Planning Standards 2019 and has been prepared in partnership with Ngai Tahu and Aukaha.	
		Support	Retain section: Strategic Direction of Part 2 as notified.	Text clearly sets out how the strategic objectives are to be applied and interpreted.	
		Support	Retain Chapter: ATC – A thriving Community of Part 2 as notified.	Objectives are generally supported, and in particular, Strategic Objective ATC-O4 in regards to community resilience and climate change.	
		Support	Retain Chapter: MW – Mana Whenua of Part 2 as notified.	The recognition of the role of mana whenua in decision making and the exercise of kaitiakitanga and customary activities as set out in MW-O1 and MW-O2 is supported.	
		Support with amendments	<p>Amend introduction to Chapter NE -Natural Environment, paragraph 3, to fix a typographical error:</p> <p><i>The District Plan must give effect to the National Policy Statement for Freshwater Management 2020. While this principally includes directions for how regional councils are to...</i></p> <p>Amend Strategic Objective NE-O1 as follows:</p> <p><i>NE- O1 Natural Environment</i></p>	Clarifies that this objective applies to all natural environment values, while still ensuring that the more significant values are explicitly considered.	

			<p><i>The values of the natural environment, <u>and particularly those that make the District unique, contribute to its character, identity and wellbeing, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</u></i></p> <ol style="list-style-type: none"> <i>1. mahika kai resources;</i> <i>2. night sky darkness;</i> <i>3. outstanding natural features and landscapes;</i> <i>4. significant indigenous biodiversity; and</i> <i>5. water bodies and their margins.</i> 		
		Support	Retain Chapter: UFD – Urban Form and Development of Part 2 as notified.	Supports development which recognises and provides for natural environment values.	
17.	Nova Energy Limited	Support	Delete 'Section 1 – Introduction' in full from the existing District Plan.		Yes
		Support	Delete 'Section 2 – Policy and Legal Framework' in full from the existing District Plan.		
		Support	<p>Delete the following definitions in 'Section 3: Definitions' from the existing district Plan:</p> <p><i>Lake: means permanent body of freshwater entirely or nearly surrounded by land</i></p> <p><i>River: means a permanently or intermittently flowing body of freshwater</i></p>		

			<i>with a formed and recognisable bed, but does not include any artificial watercourse (including irrigation canal, water supply race, canal for the supply of water for electricity power generation and farm drainage canal).</i>	
	Support	Delete 'Section 4 – Takata Whenua' in full from the existing District Plan.		Supports the deletion of this section so far as Mana Whenua support its deletion.
	Support	Retain "Mihi" Chapter in Part 1: Introduction and General Provisions, as notified.		Supports the deletion of this section so far as Mana Whenua support its inclusion.
	Support	Retain "Purpose" Chapter in Part 1: Introduction and General Provisions, as notified.		Provides clarity to the plan.
	Support with amendment	Retain "Description of the District" in Part 1: Introduction and General Provisions, but amend to the following: <i>The District contains many natural resources of significance, including mahika kai resources, night sky darkness, outstanding natural features and landscapes, significant indigenous biodiversity, and a range of water bodies and energy resources.</i>		While the description of the District provides clarity, energy resources are central to the identity of the district and need to be included in the description.
		Retain "Statutory Context" Chapter in Part 1: Introduction and General Provisions, as notified.		Provides clarity to the plan.

		Retain "General Approach" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides clarity to the plan.
		Retain "Cross Boundary Matters" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides clarity to the plan.
		Retain "Relationships between Spatial Layers" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides clarity to the plan.
		Retain "Definitions" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides consistency with the RMA and National Policy Standards.
		Retain "Abbreviations" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides clarity and consistency through the plan.
		Retain "Glossary" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides clarity and consistency through the plan.
		Retain "National Policy Statements and New Zealand Coastal Policy Statement" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides certainty that the relevant NPS's and NZCPS will be given effect to. Sufficient provision must be given to these documents, in particular the NPS on Renewable Electricity Generation 2011 and the NPS on Electricity Transmission 2008.
		Retain "National Environmental Standards" Chapter in Part 1: Introduction and General Provisions, as notified.	Provides certainty that the relevant NES's will be given effect to. Sufficient provision must be given to these documents, in particular the Resource Management

				Regulations (NES for Electricity Transmission Activities) Regulations 2009.	
			Retain “Regulations” Chapter in Part 1: Introduction and General Provisions, as notified.	Provides certainty that the plan will be in accordance with relevant regulations	
			Retain “Water Conservation Orders” Chapter in Part 1: Introduction and General Provisions, as notified.	Provides certainty that the plan will not be inconsistent with water conservation orders, if any were to be ordered in the future	
			Retain “Mana Whenua” Chapter in Part 1: Introduction and General Provisions, as notified.	Supports the addition of the Mana Whenua section so far as Mana Whenua support its inclusion.	
		Support with amendment	<p>Amend Strategic Objectives ATC-O3 and ATC-O4 as follows:</p> <p><i>ATC-O3: Infrastructure</i> <i>The importance of <u>existing and appropriate future infrastructure</u> to the District and beyond is recognised and provided for.</i></p> <p><i>ATC-O4: Renewable Electricity</i> <i>The local, regional and national benefits of the District’s <u>existing and appropriate future renewable electricity generation and electricity transmission assets</u> are recognised, and their development, operation, maintenance and upgrade are provided for.</i></p>	It is important that the proposed plan recognises and enables ‘appropriate’ future development so that there is provision for new energy facilities and infrastructure where appropriate.	
		Support	Retain Strategic Objectives MW-O1 and MW-O2 as notified.	Supports the addition of the Mana Whenua section so far as Mana Whenua support its inclusion.	

		Support in part	Retain Strategic Objective NE-O1: Natural Environment while reiterating the importance of appropriate future development of infrastructure.	Provision for infrastructure development needs to be balanced in consideration with its integration into existing environments.	
		Support	Retain Strategic Objective UFD-O1, as notified.	Support the addition of UFD-O1 as it recognises the provision for appropriate development and its integration with the environment.	

DRAFT