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To: "[Charmaine Duffell](mailto:Charmaine.Duffell@mackenzie.govt.nz)" <Charmaine.Duffell@mackenzie.govt.nz>

Date: 1/15/2023 5:55:01 PM

Subject: Waka Kotahi - Mackenzie District Plan Review - PC21 and PC22 - Further Submission

Attachments: Mackenzie District Council - PC21 PC22 - Further Submission - Waka Kotahi - For Submission.pdf

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Good afternoon Charmaine,

Please find attached the formal further submission on behalf of Waka Kotahi for Plan Change 21 and Plan Change 22.

Due to the further submission being applicable to several submission points, the online form does not enable us to enter these accordingly.

Please let me know if there are any issues with receiving the submission in this format.

Kind regards,

Livi Whyte

Planner – Environmental Planning (South)

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16 January 2022

Mackenzie District Plan Review

Further Submission on Plan Change 21 & Plan Change 22 – Stage Two: Spatial Plans Implementation & Light – Mackenzie District Plan Review

Name of Submitter: Waka Kotahi New Zealand Transport Agency

1. This is a further submission on Plan Change 21 & 22 – Stage Two of the Mackenzie District Plan Review.
2. Waka Kotahi New Zealand Transport Agency (Waka Kotahi) is an agency/person that has an interest in the proposed plan change that is greater than the interest of the general public. This is because Waka Kotahi has particular interests in ensuring the Mackenzie District Plan Review enables the continued and efficient operation and development of regionally significant infrastructure in the Mackenzie District.
3. Waka Kotahi further submissions are set out in **Table 1**.
4. Waka Kotahi wish to be heard in support of the submissions.
5. If others make a similar submission Waka Kotahi will consider presenting a joint case with them at a hearing.

Signed by:



Richard Shaw
Team Leader (South) – Environmental Planning
Waka Kotahi New Zealand Transport Agency

Pursuant to authority delegated by the New Zealand Transport Agency

Date: 16 January 2023

Address for Service:

Waka Kotahi NZ Transport Agency
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Table 1: Waka Kotahi Further Submission Points on Plan Change 21 & Plan Change 22 – Mackenzie District Plan

Submitter Name (Submitter Number)	Decision/relief requested by Submitter	Position on submission point	Reasons Waka Kotahi Support/Opposition	Decision Sought by Waka Kotahi
Plan Change 21 – Spatial Plans				
Ministry of Education (18)	Insert definition of ‘Operational need’ as <i>means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.</i>	Support	Waka Kotahi is supportive of the inclusion of a new definition for Operational need as there are occasions when works associated with nationally significant infrastructure are required in a particular environment because of technical, logistical or operational characteristics or constraints.	Include a new definition for ‘Operational need’
Mitch Taylor (41)	The rural land adjacent to the Opihi River on Geraldine-Fairlie Highway (Lot 5 RM220008) is included in Plan Change 21 and is zoned General Industrial.	Oppose	Waka Kotahi seeks further clarification on the potential traffic effects of included Lot 5 of the subdivision within the General Industrial zoning.	Further consideration and justification sought on the traffic effects of rezoning the land from rural to General Industrial.
Road Metals Company (74)	Rural land legally described as Lot 2 DP 487658 and Sec 8 SO 384036 is included in Plan Change 21 and is zoned as appropriate mix of Light, General and Heavy Industry Activity in accordance with the Mackenzie Spatial Plan, as opposed to in Stage 3 of the District Plan. Amend the relevant zone statement, objectives, and any other provisions throughout the MDP to provide for the rezoning. Including, changes to Section 5: Business Zones and any other relevant chapters. Make any necessary changes to the MDP including the rezoning of adjoining land to industrial or other appropriate zone.	Oppose	It is recognised that Waka Kotahi recently provided written approval for a gravel extraction activity on the site, conditional to a maximum of 40 truck and trailer movements per day. However, the limited impact of this one-off activity is considered to be different from the potential impacts of the wider rezoning of the site as proposed. The Spatial Plan recognised a smaller portion of the site to be appropriate for industrial purposes, however this was not included in the notified version of the District Plan. The scale of the proposed rezoning has the potential to significantly increase traffic movements from the eastern side of the state highway, as the majority of existing development in the Twizel township is on the western side.	Further consideration and justification sought on the traffic effects of rezoning the land from rural to General Industrial.

			<p>It is considered that further information and consideration of transport effects is required to understand the risks associated with the proposed rezoning to General Industrial.</p> <p>Furthermore, Waka Kotahi seeks further consideration of multi-modal connections and decarbonisation, particularly in relation to enabling safe and efficient access for pedestrians and cyclists across the state highway from Twizel to the proposed industrial area. Similar issues are supported by the National Policy Statement on Urban Development (NPS-UD) and the Canterbury Regional Policy Statement (CRPS), including, but not limited to:</p> <ul style="list-style-type: none"> • Good accessibility between housing, employment and community facilities, by way of public or active transport. • Development of areas that are well-serviced by existing or planned public transport and walking/cycling infrastructure to provide opportunities for modal choice. • Development which supports reductions in greenhouse gases emissions and resilient to the current and future effects of climate change. 	
Plan Change 22 - Light				
Opuna Water Limited (9)	Amend LIGHT-O1 as follows: <i>Outdoor lighting allows activities to occur beyond daylight hours and provides safety and security for activities, while:</i> <i>1. protecting views of the night sky; and</i>	Support	Waka Kotahi supports the amendment to the objective to include the management of light spill to ensure the safe operation of Regionally Significant Infrastructure.	Amend LIGHT-O1

	<i>2. managing light spill to maintain amenity values and the safe operation of the transport network <u>and Regionally Significant Infrastructure.</u></i>			
	Amend LIGHT-P1 as follows: <i>Manage the location, design and operation of outdoor lighting to ensure:</i> <i>1. it does not distract or interfere with traffic;</i> <i>2. the safe and efficient operation of <u>Regionally Significant Infrastructure during natural hazard events;</u> and</i> <i>3. it is compatible with the zone in which any light spill or glare is received.</i>	Support	Waka Kotahi supports the amendment to the policy as it recognises that in natural hazards events, Regionally Significant Infrastructure may require temporary lighting that exceeds the District Plan standards.	Amend LIGHT-P1 to provide for temporary lighting for Regionally Significant Infrastructure during natural hazard events, that might not meet the lighting standards in the District Plan.
	Insert new rule LIGHT-R4 to provide for emergency situations where illumination is required to maintain public safety and the safe operation of Regionally Significant Infrastructure.	Support	Waka Kotahi supports the inclusion of a new rule to provide for situations where temporary light may be required for the safe and efficient operation of Regionally Significant Infrastructure.	Include a new rule in the LIGHT chapter for temporary lighting associated with Regionally Significant Infrastructure.
Tekapo Landco Limited and Godwit Leisure Limited (19)	Amend LIGHT-S3 as follows: <i>The correlated colour temperature of outdoor lighting shall not exceed 2500 3000K.</i> Or alternatively 2700K.	Support in part	Waka Kotahi largely supports the requested amendment to increase the maximum lighting to 3000K on the basis that 2500K is not readily available. However, it is not supportive of 2700K as this is not considered suitable across the entire Mackenzie District.	Amend LIGHT-S3 to require correlated colour temperature of outdoor lighting not exceed 3000K.