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Mackenzie District Plan Review Stage 4 submission on proposed provisions

Thank you for the opportunity to submit on proposed Plan Changes 28, 29 and 30 to the Mackenzie District Plan. We wish to acknowledge the extensive work that has been undertaken by the Council in preparing these proposed plan changes and appreciate the collaborative approach that has been taken. We support the overall direction outlined in the proposed provisions.

We have attached our submission on stage 4 of the Mackenzie District Plan review to this letter. The submission has been prepared by Environment Canterbury staff under delegated authority from the Canterbury Regional Council.

We look forward to continuing to work with you on the Mackenzie District Plan review and welcome any questions you may have regarding our comments. Our email address for questions, comments, and updates on the plan review process is regionalplanning@ecan.govt.nz.

Yours sincerely,



Amanda Thompson
Team Leader, Strategy and Planning

To Mackenzie District Council

SUBMITTER DETAILS

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SUBMISSION DETAILS

- A. This is a submission on proposed Plan Change 28 (PC28), proposed Plan Change 29 (PC29), and proposed Plan Change 30 (PC30), as well as Variations 1 and 2 to Plan Change 23, Variations 1, 2, and 3 to Plan Change 26, and Variations 1, 2, and 3 to Plan Change 27 to the Mackenzie District Plan, and the proposed Designations Chapter.
- B. The relief sought by Canterbury Regional Council (hereafter Environment Canterbury) is addressed below.
- C. Environment Canterbury could not gain an advantage in trade competition through this submission.
- D. If others make a similar submission, Environment Canterbury will consider presenting a joint case with them at the hearing.

REASONS FOR SUBMISSION

General Comments

1. Environment Canterbury thanks the Mackenzie District Council (MDC) for the opportunity to comment on Stage 4 of its District Plan Review, and for engaging with Environment Canterbury prior to notification. Environment Canterbury supports MDC in seeking to improve the clarity of the operative district plan and in proposing

changes that seek to give effect to the Canterbury Regional Policy Statement 2013 (CRPS) and national direction.

2. Environment Canterbury administers the CRPS. Both Environment Canterbury and MDC have responsibilities under the CRPS to achieve integrated management of the natural and physical resources within their respective jurisdictional areas.
3. The reasons for Environment Canterbury's submission on the proposed plan changes are:
 - a. to ensure that the plan changes and provisions give effect to the CRPS as required by section 75 of the Resource Management Act 1991 (RMA); and
 - b. to assist Environment Canterbury in carrying out its functions under section 30 of the RMA; and
 - c. to enable Environment Canterbury to protect people and property within the Mackenzie District from the impacts of flooding and erosion; and
 - d. to enable Environment Canterbury to effectively manage Takapō Regional Park; and
 - e. to propose edits so that plan provisions are clear and free from minor errors.
4. In summary, Environment Canterbury's submission covers the following components:
 - a. General support for the proposed changes to the Mackenzie District Plan.
 - b. Amendments sought as follows:
 - i. Natural hazard provisions: requesting that these align with the CRPS, and best practice as outlined in Environment Canterbury's feedback on the draft provisions, especially in regard to flood hazards and earthquake hazards.
 - ii. Contaminated land provisions: requesting that effects of developing contaminated land on the wider environment are managed alongside human health impacts that are covered by the National Environmental Standards on Contaminated Soils.
 - iii. Natural Hazard Mitigation works: requesting that works carried out by Environment Canterbury are enabled through Permitted Activity provisions.
 - iv. Takapō Regional Park: requesting that the designation for this soil conservation reserve includes the whole area of the park.

5. Overall, Environment Canterbury considers that PC28, PC29, and PC30 (and the associated variations to PC23, PC26, and PC27) are well drafted and generally give effect to the CRPS. However, some amendments are requested to help implement specific aspects of the CRPS and to ensure the integrated management of natural and physical resources. While amendments have been requested, we note that there is more than one way to achieve the intent of our requests and accordingly Environment Canterbury is happy to work with MDC on any amendments prior to the release of the s42A report.
6. Where amendments have been sought, we have used underlined text to indicate recommended additions to the provisions and ~~strikethrough text~~ to indicate recommendations for the removal of the proposed text.
7. Environment Canterbury seeks that decisions address the matters raised in this submission, and in particular the specific sections and provisions of the Mackenzie District Plan as set out in the table below. Environment Canterbury seeks any alternative and consequential amendments to the provisions to address its submission points.

Submission on Plan Change 28 (Hazards and Risks, Historic Heritage and Notable Trees), Variation 1 to Plan Change 26, and Variation 1 to Plan Change 27

Definitions

8. Environment Canterbury makes the following submission on definitions to be added to the Mackenzie District Plan through PC28:

Definition	Support / Oppose	Comments	Change requested
Critical Infrastructure	Neutral	<p>Differs from the CRPS definition (and combines CRPS definitions for Critical Infrastructure and Regionally Significant Infrastructure).</p> <p>The difference is that critically significant nationally and locally rather than just regionally significant infrastructure is included.</p>	No change requested

		The approach seems sensible when it comes to natural hazards.	
Heavy Industrial Activity	Oppose in part	The inclusion of night soils collection and disposal in the definition may no longer be necessary given the improved sanitation situation across the country.	<p>Amend definition as follows:</p> <p>Means...</p> <ul style="list-style-type: none"> l. Gut scraping and treating m. Nightsoil collection and disposal n. Slaughtering of animals for any purpose other than human consumption o. Storage, drying, or preserving of bones, hides, hoofs, or skins p. Tallow melting q. Tanning q. Wood pulping r. Wool scouring
Heritage Fabric	Support		No change requested
High Flood Hazard Area	Support in part	The proposed definition does not align with the CRPS definition of "High Hazard Area". The proposed definition does not include the CRPS depth only component.	<p>Amend definition as follows:</p> <p>Means areas where the product of water depth (metres) multiplied by velocity (metres per second) equals or exceeds 1, <u>or where depths are greater than 1 metre, in areas subject to inundation during an event of 500 year ARI flood event.</u></p>
Liquefaction	Support		No change requested
Natural Hazard Mitigation Works	Support		No change requested

Natural Hazard Sensitive Building		Would prefer that attached garages are included in the definition.	<p>Amend definition as follows:</p> <p>Means a building which:</p> <ol style="list-style-type: none"> Contains one or more habitable room: and/or Contains one or more employee (at least one full time equivalent); and/or Is a place of assembly; and/or Is serviced with a sewerage system or connected to a potable water supply <p>Excludes:</p> <ul style="list-style-type: none"> Any attached garage or-detached garage that is not a habitable room That part of an aircraft hangar that is not a habitable room A below ground swimming pool...
Non critical infrastructure (in relation to Natural Hazards Chapter only)	Neutral		No change requested
Occupied building	Neutral		No change requested
Qualified arborist	Neutral		No change requested
Residual risk	Support	Aligns with Environment Canterbury feedback on the draft provisions.	No change requested
Root protection zone	Neutral		No change requested

Strategic transport network	Support	Similar to CRPS definition, noting that the Mackenzie District does not contain a rail network, core public passenger transport operations, or significant regional transport hubs.	No change requested
Surface fault rupture	Support		No change requested

Abbreviations

9. Environment Canterbury makes the following submission on abbreviations to be added to the Mackenzie District Plan through PC28:

Abbreviation	Support / Oppose	Comments	Change requested
ARI	Support in part	Correction needed	Amend abbreviation as follows: Annual <ins>Average</ins> Recurrence Interval

Infrastructure

10. Environment Canterbury makes the following submission on the proposed changes to the Infrastructure (INF) Chapter introduced under Variation 1 to Plan Change 26:

Provision	Support / Oppose	Comments	Change requested
Table 1 – provisions that also apply to infrastructure: CL Chapter NH Chapter HAZS O2, P1, P2, R1, R2 HH Chapter TREE Chapter	Support	This table is currently under appeal in regards to earlier changes to the district plan.	No change requested

Renewable Electricity Generation

11. Environment Canterbury makes the following submission on the proposed changes to the Renewable Electricity Generation (REG) Chapter introduced under Variation 1 to Plan Change 26:

Provision	Support / Oppose	Comments	Change requested
Table 1 – provisions that also apply to renewable electricity generation activities: CL Chapter HAZS O2, P1, P2, R1, R2 HH Chapter TREE Chapter	Support	This table is currently under appeal in regards to earlier changes to the district plan.	No change requested

Contaminated Land

12. Environment Canterbury makes the following submission on the proposed Contaminated Land (CL) Chapter:

Provision	Support / Oppose	Comments	Change requested
Introduction		Activities on contaminated land can also impact on the wider environment. Effects on freshwater are the responsibility of the regional council.	Amend Introduction as follows: ...Resource consent may be required from the district council under the NESCS. This chapter does however contain objective and policy guidance for assessing resource consents which are required under the NESCS. <u>Resource consent may also be required from the regional council for some activities taking place on potentially contaminated and contaminated land.</u>

CL-O1 Contaminated Land	Support	Consistent with Environment Canterbury feedback on the draft provisions.	No change requested
CL-P1 Managing Effects of Contaminated Land	Support	Gives effect to CRPS Objective 17.2.1 and Policy 17.3.2.	No change requested
CL-P2 Remediation Works	Support	Gives effect to CRPS Objective 17.2.1 and Policy 17.3.2.	No change requested

Hazardous Substances

13. Environment Canterbury makes the following submission on the proposed Hazardous Substances (HAZS) Chapter:

Provision	Support / Oppose	Comments	Change requested
HAZS – O1 Use and Storage of Hazardous Substances	Support	Gives effect to CRPS Objective 18.2.1 and Policies 18.3.1 and 18.3.2.	No change requested
HAZS – O2 Sensitive Activities	Support	Gives effect to CRPS Objective 18.2.1 and Policies 18.3.1.	No change requested
HAZS – P1 Storage and Use of Hazardous Substances	Support	Gives effect to CRPS Objective 18.2.1 and Policies 18.3.1 and 18.3.2.	No change requested
HAZS – P2 Management of Major Hazard Facilities	Support		No change requested
HAZS – P3 Location of Sensitive Activities	Support	Gives effect to CRPS Objective 18.2.1 and Policies 18.3.1.	No change requested

HAZS – R1 Use and/or Storage of Hazardous Substances, Excluding a Major Hazard Facility	Support in Part	0.5% in High Flood Hazard Area should read 0.2% for consistency with other parts of the proposed district plan and to improve risk management.	<p>Amend Rule as follows:</p> <p>Activity status when compliance is not achieved with R1.1: RDIS Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The extent to which hazardous substances can be safely contained to avoid inundation by floodwater or contamination of land or water in the event of a <u>0.52%</u> AEP flood event.
HAZS – R2 New Major Hazard Facilities and Additions or Alterations to Existing Major Hazard Facilities	Support		No change requested
HAZS – R3 Sensitive Activities on a Site Adjoining a Major Hazard Facility	Support		No change requested
HAZS-R4 Sensitive Activities on the Same Site as a Major Hazard Facility	Support		No change requested
HAZS-MD1	Support		No change requested

Natural Hazards

14. Environment Canterbury makes the following submission on the proposed Natural Hazards (NH) Chapter:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support in Part	<p>Does not include landslides in the list of hazards.</p> <p>The Introduction mentions a Rural-Urban Interface Overlay that doesn't exist on the proposed maps.</p>	<p>Amend Introduction as follows:</p> <p>...The natural hazards managed by this chapter of the District Plan are:</p> <ul style="list-style-type: none"> • Flood hazards; • Surface fault rupture as a result of earthquakes; • Liquefaction as a result of earthquakes; and • Wildfire hazards; and • <u>Landslide hazards;</u> <p>...The District Plan assists with managing the risk of wildfire spread by managing vegetation at the rural-urban interface which is identified in the Rural-Urban Interface Overlay and requiring water supply for firefighting...</p>
NH-O1 Risk from Natural Hazards	Support	Gives effect to CRPS Objective 11.2.1 and Policies 11.3.1, 11.3.2 and 11.3.3.	No change requested
NH-O2 Critical Infrastructure and Specific Buildings in Natural Hazard Overlays	Support in part	<p>Generally gives effect to CRPS Objective 11.2.1 and Policy 11.3.4.</p> <p>Needs to be consistent with NH-P8. Sometimes infrastructure needs to be in a specific location, even though it could be damaged should a natural hazard event occur.</p>	<p>Amend Objective as follows:</p> <ol style="list-style-type: none"> 1. Critical infrastructure is located and designed to be resilient to the effects of natural hazards, and located to be resilient to the effects of natural hazards as far as is practicable; and...

NH-O3 Natural Hazard Mitigation	Support	Gives effect to CRPS Objective 11.2.2 and Policy 11.3.7.	No change requested
NH-O4 Natural Hazard Mitigation Works	Support in part	Gives effect to CRPS Objective 11.2.2 and Policies 11.3.6 and 11.3.7.	Amend Objective as follows: Natural hazard mitigation works and systems are <u>enabled and maintained</u> to reduce the impact of natural hazards on people, communities, property and infrastructure.
NH-P1 Identification of Natural Hazards	Support in part	Gives effect to CRPS Objective 11.2.1 High Flood Hazard Areas are identified through assessments rather than in an overlay.	Amend policy as follows: Identify areas of natural hazards risk through the use of natural hazard overlays <u>and natural hazard assessments</u> , and use the most up to date information available to provide site specific natural hazard assessments
NH-P2 Climate Change	Support	Gives effect to CRPS Objective 11.2.3 and Policy 11.3.8. Note that climate change is not mentioned in the objectives, rules or matters of discretion.	No change requested
NH-P3 Risk Based Approach	Support	Gives effect to CRPS Objective 11.2.1 and Policy 11.3.5.	No change requested
NH-P4 Flood Hazards	Support in part	Generally gives effect to CRPS Objective 11.2.1 and Policies 11.3.1 and 11.3.2.	Amend policy as follows: Within the Flood Hazard assessment Overlay (except High Flood Hazard Areas), enable:....

		<p>It is inappropriate to enable subdivision, use or development that increases flood risk on another site.</p>	<p>3. any other new subdivision, use and development only where <u>it does not increase flood risk on another site, and where</u> every new natural hazard sensitive building has an appropriate floor level above the 500 year ARI design flood level.</p>
NH-P5 High Flood Hazard Area	Support in part	<p>Generally gives effect to CRPS Objective 11.2.1 and Policies 11.3.1 and 11.3.2.</p> <p>It is inappropriate to enable subdivision, use or development that increases flood risk on another site.</p>	<p>Amend policy as follows:</p> <p>Within any High Flood Hazard Area avoid any:....</p> <p>2. Subdivision and new natural hazard sensitive buildings unless it is:</p> <ul style="list-style-type: none"> a. Not likely to result in loss of life or serious injuries; and b. Not likely to suffer significant damage or loss; and c. Not likely to require new or upgraded public natural hazard mitigation works to be undertaken by a local authority to mitigate or avoid the natural hazard; and d. Not likely to exacerbate the effects of the natural hazard.

			<u>including by increasing flood risk on another site....</u>
NH-P6 Natural Hazard Mitigation Works	Support	<p>Gives effect to CRPS Objective 11.2.2 and Policies 11.3.6 and 11.3.7.</p> <p>Support enabling Natural Hazard Mitigation Works including in natural hazard overlay areas.</p>	No change requested
NH-P7 Fault Hazard	Support	<p>Gives effect to CRPS Objective 11.2.1 and Policies 11.3.1 and 11.3.3.</p>	No change requested
NH-P8 Fault Hazard Risk to Critical Infrastructure and Specific Buildings	Support in part	<p>Gives effect to CRPS Objective 11.2.1 and Policies 11.3.3 and 11.3.4 in terms of critical infrastructure and major hazard facilities.</p> <p>The Fault Hazard (Critical Infrastructure) Overlay is only intended for critical infrastructure (and major hazard facilities would fit into this too). It is inappropriate to include educational facilities and visitor accommodation activities in this policy. Because the Fault Hazard (Critical Infrastructure) Overlay includes all known and suspected faults in the district, including faults that are only</p>	<p>Amend policy as follows:</p> <p>...2. Critical infrastructure, major hazard facilities, education facilities or visitor accommodation activities only locate within the Fault Hazard (Critical Infrastructure) Overlay where:....</p>

		'possible', it is too stringent to include education facilities and visitor accommodation in these provisions.	
NH-P9 Subdivision within the Liquefaction Overlay	Support	Gives effect to CRPS Objective 11.2.1 and Policies 11.3.1 and 11.3.3.	No change requested
NH-P10 Wildfire	Support	Gives effect to CRPS Objective 11.2.1 and Policy 11.3.1.	No change requested
NH-R1 New Natural Hazard Sensitive Buildings	Support		No change requested
NH-R2 Extensions to Existing Natural Hazard Sensitive Buildings	Support		No change requested
NH-R3 New non critical infrastructure, or the operation, maintenance, repair, replacement, upgrading of non critical infrastructure and the operation, maintenance, repair, replacement, upgrading of critical infrastructure	Support		No change requested
NH-R4 New Critical Infrastructure	Support		No change requested
NH-R5 Natural Hazard Mitigation Works	Support in part	<p>The rule could be made clearer and more enabling by adopting the suggested drafting.</p> <p>This would enable the regional council</p>	<p>Amend rule as follows:</p> <p>Activity Status: PER</p> <p>Where:</p> <p>The works are:</p> <ol style="list-style-type: none"> 1. The maintenance or operation of any existing natural

		<p>to undertake all/any natural hazard mitigation works as a permitted activity.</p> <p>Environment Canterbury's Environmental Planning systems protect environmental values without the need to subject the works to the other district plan provisions.</p>	<p>hazard mitigation works; or</p> <p>2. <u>The upgrading or establishment of any new natural hazard mitigation works administered by a regional council or territorial authority.</u></p> <p>Note: The earthworks provisions in Earthworks any other Chapter shall not apply to any activity permitted under NH-R5.1</p> <p>Amend rule as follows:</p> <p>Activity Status: PER Where: The works are:</p> <p>3. The establishment of any new natural hazard mitigation works administered by a regional Council or Territorial Authority.</p> <p>Matters of discretion are restricted to:</p> <p>a. NH-MD2</p> <p>Activity status when compliance is not achieved with R5.3: DIS</p>
NH-R6 New critical infrastructure, major hazard facilities, education facilities and visitor accommodation activities	Support in part	<p>The Fault Hazard (Critical Infrastructure) Overlay is only intended for critical infrastructure (and major hazard facilities would fit into this too). It is inappropriate to include education facilities and visitor accommodation activities in this policy. Because the Fault Hazard (Critical Infrastructure) Overlay includes all</p>	<p>Amend the rule as follows:</p> <p>NH-R6 New Critical infrastructure, <u>and</u> major hazard facilities, education facilities and visitor accommodation activities</p> <p>Activity Status: RDIS Matters of discretion are restricted to:</p> <p>...b. The extent to which the location and design of the critical infrastructure, <u>or</u> major hazard facility, <u>education facility or visitor accommodation activities</u> addresses relevant natural</p>

		<p>known and suspected faults in the district, including faults that are only 'possible', it is too stringent to include education facilities and visitor accommodation in these provisions.</p> <p>It would be more appropriate to require new education facilities and visitor accommodation to undertake site-specific investigations to determine the location of fault deformation, and set back from that, within the Fault Hazard (Subdivision) Overlay, similar to SUB-R7A. The Fault Hazard (Subdivision) Overlay is a subset of the Fault Hazard (Critical Infrastructure) Overlay that only includes the more active faults, and the faults that we are more certain are actually faults.</p>	<p>hazard risk and appropriate measures that have been incorporated into the design to provide for the continued operation of the infrastructure or building.</p> <p>c. The location of the critical infrastructure, <u>or</u> major hazard facility, education facility or visitor accommodation activities and the extent to which the siting and layout of the development will reduce the effects of surface fault rupture and tilting on people and their property.</p> <p>d. The extent to which the geotechnical and/or engineering reports show that:</p> <ul style="list-style-type: none"> i. risks to the structural integrity of the critical infrastructure, <u>or</u> major hazard facility, education facility or visitor accommodation activities can be appropriately managed, and ii. the safety of occupiers of the critical infrastructure, <u>or</u> major hazard facility, education facility or visitor accommodation activities can be provided for; and iii. buildings on adjoining sites of the critical infrastructure, <u>or</u> major hazard facility, education facility or visitor accommodation facilities can be protected.
NH-R7 New and Relocated Residential Units, Minor Residential Units	Support		No change requested
NH-R8 Buildings and Structures Not	Support		No change requested

Otherwise Provided For			
NH-R9 Residential Visitor Accommodation	Support		No change requested
NH-R10 Planting within Te Manahuna/Mackenzie Basin ONL	Support	Previously we had also supported a further provision for setbacks within the GRUZ.	No change requested
NH – new rule to control the exacerbation of flooding on other properties		<p>The proposed rules only give the district council scope to consider the exacerbation of flooding on other properties in specific circumstances.</p> <p>This leaves gaps where the district council will not have scope to address the exacerbation of flooding on other properties. Suggest a rule similar to that adopted in the Kaikōura District Plan.</p>	<p>Insert new rule as follows:</p> <p><u>NH-RX Above ground earthworks, new buildings and structures in the Flood Hazard Assessment Overlay</u></p> <p><u>Activity Status: PER</u></p> <p><u>Where:</u></p> <ol style="list-style-type: none"> <u>Flooding will not be worsened on another property through the diversion or displacement of floodwaters</u> <p><u>Activity status when compliance is not achieved with RX.1: RDIS</u></p> <p><u>Matters of discretion are restricted to:</u></p> <ol style="list-style-type: none"> <u>The likely extent of flooding on the site</u> <u>The potential for the activity to exacerbate flooding on any other site</u> <u>The extent to which the earthworks or new building or structure impedes the free passage of floodwater</u>
NH-S1 Flood Hazard Assessment	Support		No change requested

NH-MD1 Activities in the Flood Hazard Assessment Overlay	Support		No change requested
NH-MD2 Natural Hazard Mitigation Works	Oppose	These matters of discretion are unnecessary if the requested changes are made to NH-R5.	Delete NH-MD2

Hydro Inundation

15. Environment Canterbury makes the following submission on the proposed Hydro Inundation (HI) Chapter:

Provision	Support / Oppose	Comments	Change requested
HI-O1 Hydro Inundation Hazard	Neutral		No change requested
HI – P1 Development in Hydro Inundation Hazard Areas	Neutral		No change requested
HI-R1 New Occupied Buildings	Neutral		No change requested
HI-R2 Residential Units	Neutral		No change requested
HI-R3 Residential Visitor Accommodation	Neutral		No change requested

Historic Heritage

16. Environment Canterbury makes the following submission on the proposed Historic Heritage (HH) Chapter:

Provision	Support / Oppose	Comments	Change requested
HH-O1 Protection of Historic Heritage	Support	Gives effect to CRPS Objective 13.2.1 and Policy 13.3.1.	No change requested
HH-O2 Church of the Good Sheperd Heritage Overlay	Support	Gives effect to CRPS Objective 13.2.2 and Policy 13.3.3.	No change requested
HH-O3 Te Kopi-o-Ōpihi / Burkes Pass Heritage Overlay	Support	Gives effect to CRPS Objective 13.2.1 and Policy 13.3.1.	No change requested
HH-P1 Identification and Scheduling of Historic Heritage Items	Support	Gives effect to CRPS Objective 13.2.1 and Policy 13.3.1.	No change requested
HH-P2 Works on Historic Heritage Items	Support	Gives effect to CRPS Objective 13.2.3 and Policy 13.2.4.	No change requested
HH-P3 Use, Development and Re-use of Historic Heritage Items	Support	Gives effect to CRPS Objective 13.2.3 and Policy 13.2.4.	No change requested
HH-P4 Subdivision	Support	Gives effect to CRPS Objective 13.2.3 and Policy 13.2.4.	No change requested
HH-P5 Relocation of Historic Heritage Items	Support	Gives effect to CRPS Objective 13.2.3 and Policy 13.2.4.	No change requested
HH-P6 Demolition and Partial Demolition of Historic Heritage Items	Support	Gives effect to CRPS Objective 13.2.3 and Policy 13.2.4.	No change requested

HH-P7 Church of the Good Sheperd Heritage Overlay	Support	Gives effect to CRPS Objective 13.2.2 and Policy 13.3.3.	No change requested
HH-P8 Te Kopi-o-Ōpihi / Burkes Pass Heritage Overlay	Support	Gives effect to CRPS Objective 13.2.2 and Policy 13.3.3.	No change requested
HH-R1 Maintenance and Repair of Items included in HH-SCHED2	Support		No change requested
HH-R2 Customer Connections to Items included in HH-SCHED2	Support		No change requested
HH-R3 Earthquake Strengthening of Items included in HH-SCHED2 Except Where the Works are Provided for by HH-R1	Support		No change requested
HH-R4 Additions and Alterations to the Exterior of Items included in HH-SCHED2	Support		No change requested
HH-R5 Relocation of an Item included in HH-SCHED2	Support		No change requested
HH-R6 Partial or total demolition of any item included in HH-SCHED2 that is not included on the HNZPT New Zealand Heritage List/Rārangi Kōrero, or that is classified as Category 2 or a	Support		No change requested

Historic Area on the HNZPT New Zealand Heritage List/Rārangi Kōrero			
HH-R7 Partial or total demolition of any item included in HH-SCHED2 that is classified Category 1 on the HNZPT New Zealand Heritage List/Rārangi Kōrero	Support		No change requested
HH-R8 Works within the Church of the Good Shepherd Heritage Overlay	Support		No change requested
HH-R9 Relocation of an item included in HH-SCHED2 to a site outside of the heritage overlay area	Support		No change requested
HH-R10 New Buildings and Extensions to Existing Buildings	Support		No change requested
HH-R11 Fencing	Support		No change requested
HH-MD1 Maintenance and Repairs, Alterations and Additions	Support		No change requested
HH-MD2 Relocation of a heritage item Within its Site	Support		No change requested
HH-MD3 Te Kopi-o-Ōpihi / Burkes Pass Heritage Overlay	Support		No change requested

HH-SCHED1 Historic Heritage Assessment Criteria	Support		No change requested
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Notable Trees

17. Environment Canterbury makes the following submission on the proposed Notable Trees (TREE) Chapter:

Provision	Support / Oppose	Comments	Change requested
TREE-O1 Notable Trees	Neutral		No change requested
TREE-P1 Identification of Notable Trees	Neutral		No change requested
TREE-P2 Protection of Notable Trees	Neutral		No change requested
TREE-P3 Works around Notable Trees	Support	Gives effect to RPS Policy 5.3.9.	No change requested
TREE-P4 Maintenance of Notable Trees	Neutral		No change requested
TREE-P5 Destruction or Removal of Notable Trees	Support		No change requested
TREE-R1 Maintenance Pruning of a Notable Tree listed in TREE-SCHED1	Neutral		No change requested
TREE-R2 Pruning of a Notable Tree listed in TREE-SCHED1 for the	Support	Gives effect to RPS Policy 5.3.9.	No change requested

Purpose of Maintaining Overhead Lines and Road Safety Corridor			
TREE-R3 Earthworks and Land disturbance for the Installation and maintenance of Underground Lines within the Root Protection Zone of a Notable Tree listed in TREE-SCHED1	Neutral		No change requested
TREE-R4 Earthworks and Land Disturbance not Specified in TREE-R3 within the Root Protection Zone of a Notable Tree listed in TREE-SCHED1	Neutral		No change requested
TREE-R5 Paving, sealing, soil compaction, storage of materials, parking of vehicles or buildings within the Root Protection Zone of a Notable Tree listed in TREE-SCHED1	Neutral		No change requested
TREE-R6 Destruction or Removal of a Notable Tree listed in TREE-SCHED1	Support		No change requested
TREE-R7 Attachment of a Sign, Object, Structure, or	Neutral		No change requested

Material to a Notable Tree listed in TREE-SCHED1			
TREE-R8 Planting of a Tree within the Dripline of a Notable Tree listed in TREE-SCHED1	Neutral		No change requested
TREE-MD1 Pruning	Neutral		No change requested
TREE-MD2 Activities in the Root Protection Zone of a Notable Tree	Neutral		No change requested
TREE-MD3 Fixing to Notable Trees	Neutral		No change requested

Subdivision

18. Environment Canterbury makes the following submission on the proposed changes to the Subdivision (SUB) Chapter introduced under Variation 1 to Plan Change 27:

Provision	Support / Oppose	Comments	Change requested
SUB-O1 Subdivision Design	Support in part	<p>Gives effect to CRPS Objective 5.2.1 and Policies 5.3.2 and 5.3.5.</p> <p>There are no proposed changes to this objective under the proposed variation, but as currently written it does not mention subdivision in hazardous areas. An amendment is requested to address this issue.</p>	<p>Amend the objective as follows:</p> <p>Subdivision is designed to:</p> <p>...2. <u>support</u>maintain the <u>values</u> <u>purpose</u> of any overlays within which it is located;...</p>
SUB-P1 Subdivision Design	Support in part	Gives effect to CRPS Objective 5.2.1 and	Amend the policy as follows:

		<p>Policies 5.3.2 and 5.3.5.</p> <p>There are no proposed changes to this policy under the proposed variation, but as currently written it does not mention subdivision in hazardous areas.</p>	<p>Require subdivision design to accord with the purpose and character of the applicable zone <u>and overlays</u> and, where practicable...</p>
SUB-R7A Subdivision where any part of any proposed allotment is within the Fault Hazard (Subdivision) Overlay	Support in part	<p>Gives effect to RPS Objective 11.2.1, and Policy 11.3.1.</p> <p>Scale should be 1:10,000 rather than 1:35,000.</p>	<p>Amend the rule as follows:</p> <ol style="list-style-type: none"> 1. A map of the zone of deformation associated with surface fault rupture at a scale of 1:3510,000 or better is provided by a suitably qualified and experienced professional that identifies any zone of deformation; and...
SUB- R7B Subdivision where any part of any proposed allotment is within the Flood Hazard Assessment Overlay	Support	<p>Gives effect to RPS Objective 11.2.1, and Policy 11.3.1.</p>	No change requested
SUB-R7C Subdivision where any part of any proposed allotment is within the Liquefaction Overlay	Support	<p>Gives effect to RPS Objective 11.2.1, and Policy 11.3.1.</p>	No change requested
SUB-R7D Subdivision where any part of any proposed allotment is within the Ostler	Support	<p>Gives effect to RPS Objective 11.2.1, and Policy 11.3.1.</p>	No change requested

Fault Hazard Area Overlay			
SUB-R7E Subdivision where any part of any proposed allotment is within the Hydro Inundation Hazard Overlay	Support	Gives effect to RPS Objective 11.2.1, and Policy 11.3.1.	No change requested
SUB-R9 Subdivision of a Site Containing a Historic Heritage Site, Building, Structure or Item Listed in HH-SCHED2	Support		No change requested

Earthworks

19. Environment Canterbury makes the following submission on the proposed changes to the Earthworks (EW) Chapter introduced under Variation 1 to Plan Change 27:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support		No change requested

Submission on Plan Change 29 (Open Space and Recreation Zones, Noise, Signs and Temporary Activities), Variation 1 to Plan Change 23, variation 2 to Plan Change 26 and Variation 2 to Plan Change 27

Definitions

20. Environment Canterbury makes the following submission on definitions to be added to the Mackenzie District Plan through PC29:

Definition	Support / Oppose	Comments	Change requested
Agricultural and Horticultural Noise	Neutral		No change requested
Commercial recreation activity	Neutral		No change requested

Community market	Neutral		No change requested
Emergency response purposes	Neutral		No change requested
Filming	Neutral		No change requested
Freestanding sign	Neutral		No change requested
Noise sensitive activities	Neutral		No change requested
Normal domestic activities	Neutral		No change requested
Off-site sign	Neutral		No change requested
Temporary emergency services training activities	Neutral		No change requested
Temporary event	Neutral		No change requested
Temporary residential accommodation	Oppose in part	There doesn't appear to be any consideration of wastewater associated with temporary residential accommodation.	Amend either the definition or the rule to ensure that the temporary residential accommodation is either associated with a residential dwelling or self-contained.

Infrastructure

21. Environment Canterbury makes the following submission on the proposed changes to the Infrastructure (INF) Chapter introduced under Variation 2 to Plan Change 26:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support		No change requested

Renewable Electricity Generation

22. Environment Canterbury makes the following submission on the proposed changes to the Renewable Electricity Generation (REG) Chapter introduced under Variation 2 to Plan Change 26:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support		No change requested

Natural Character

23. Environment Canterbury makes the following submission on the proposed changes to the Natural Character (NATC) Chapter introduced under Variation 1 to Plan Change 23:

Provision	Support / Oppose	Comments	Change requested
Table NATC-1: Surface Waterbody Setbacks	Support	Gives effect to CRPS Policy 7.3.1.	No change requested

Noise

24. Environment Canterbury makes the following submission on the proposed Noise (NOISE) Chapter:

Provision	Support / Oppose	Comments	Change requested
NOISE-O1 Noise	Neutral		No change requested
NOISE-P1 Noise Effects	Neutral		No change requested
NOISE-P2 Reverse Sensitivity	Neutral		No change requested
NOISE-R1 Noise Generating Activity Not Otherwise Listed	Neutral		No change requested

NOISE-R2 Permitted Noise	Neutral		No change requested
NOISE-R3 Noise Associated with Recreational Activities	Neutral		No change requested
NOISE-R4 Temporary Activities (Excluding Temporary Military Activities)	Neutral		No change requested
NOISE-R5 Noise associated with the Operation and Maintenance of Aircraft Engines	Neutral		No change requested
NOISE-R6 Construction Noise	Neutral		No change requested
NOISE-R7 Blasting Noise	Neutral		No change requested
NOISE-R8 Frost fan Noise	Neutral		No change requested
NOISE-R9 Audible Bird Scaring Device Noise	Neutral		No change requested
NOISE-R10 Noise Generated by Aircraft and Helicopter Movements	Neutral		No change requested
NOISE-R11 Noise Associated with the use of Airfields and Helicopter Landing Areas	Neutral		No change requested

NOISE-R12 Noise Associated with Airport Activities and Airport Support Activities	Neutral		No change requested
NOISE-R13 Noise Associated with Motorised Craft	Neutral		No change requested
NOISE-R14 Temporary Military Training Activities – Weapons Firing and or/use of Explosives	Neutral		No change requested
NOISE-R15 Temporary Military Activities – All Other Noise Sources not Listed in NOISE-R14	Neutral		No change requested
NOISE-R16 Any New Building Containing a Noise sensitive Activity, or the Alteration of an Existing Building which Creates a New Habitable room, or the Use of an Existing Building for a New Noise Sensitive Activity	Neutral		No change requested
NOISE-R17 Any New Building Containing a Noise sensitive Activity, or the Alteration of an Existing Building which Creates a New Habitable room, or the Use of an Existing Building for a New Noise Sensitive Activity, within 500m of any	Neutral		No change requested

Special Purpose Airport Zone			
NOISE-R18 Any New Building Containing a Noise sensitive Activity, or the Alteration of an Existing Building which Creates a New Habitable room, or the Use of an Existing Building for a New Noise Sensitive Activity	Neutral		No change requested
NOISE-TABLE 1 – Noise Limits	Neutral		No change requested
NOISE-TABLE 2 – Indoor Design Noise Levels	Neutral		No change requested
NOISE-MD1 Noise Effects	Neutral		No change requested

Earthworks

25. Environment Canterbury makes the following submission on the proposed changes to the Earthworks (EW) Chapter introduced under Variation 2 to Plan Change 27:

Provision	Support / Oppose	Comments	Change requested
EW-R3 Earthworks not Specified in EW-R1, or EW-R2	Support	Additional zones only	No change requested

Signs

26. Environment Canterbury makes the following submission on the proposed Signs (SIGN) Chapter:

Provision	Support / Oppose	Comments	Change requested
SIGN-O1 Benefits of Signs	Neutral		No change requested
SIGN-P1 Signs Integral to Activities	Neutral		No change requested
SIGN-P2 Amenity and Character	Support	Gives effect to CRPS Objectives 12.2.1 and 12.2.2 and Policies 12.3.2 and 12.3.3.	No change requested
SIGN-P3 Safety	Support	Gives effect to CRPS Objective 5.2.3 and Policy 5.3.7.	No change requested
SIGN-R1 Any Sign Not Otherwise Listed	Neutral		No change requested
SIGN-R2 Signs Located Within the Footpath	Neutral		No change requested
SIGN-R3 Official Signs and Community Information Signs	Neutral		No change requested
SIGN-R4 Temporary Signs	Neutral		No change requested
SIGN-R5 Off-site Signs Not Otherwise Specified in SIGN-R1.9, SIGN-R2, SIGN-R3 and SIGN-R4	Neutral		No change requested
SIGN-S1 General Requirements	Neutral		No change requested

SIGN-S2 Signs Attached to Verandahs	Neutral		No change requested
SIGN-S3 Signs Attached to Buildings and Structures	Neutral		No change requested
SIGN-S4 Illuminated Signs	Neutral		No change requested
SIGN-S5 Signs Adjacent to State Highways	Support		No change requested
SIGN-S6 Minimum Lettering Height	Neutral		No change requested
SIGN-MD1 General Matters	Neutral		No change requested
SIGN-MD2 Traffic Safety	Support		No change requested

Light

27. Environment Canterbury makes the following submission on the proposed changes to the Light (LIGHT) Chapter:

Provision	Support / Oppose	Comments	Change requested
LIGHT-TABLE 1	Neutral		No change requested

Temporary Activities

28. Environment Canterbury makes the following submission on the proposed Temporary Activities (TEMP) Chapter:

Provision	Support / Oppose	Comments	Change requested
TEMP-O1 Temporary Activities	Neutral		No change requested
TEMP-P1 Managing Effects of Temporary Activities	Neutral		No change requested
TEMP-R1 Temporary Buildings Including Offices, Storage Sheds, Freight Containers, Builders' Workshops, Accommodation Buildings	Neutral		No change requested
TEMP-R2 Temporary Events	Neutral		No change requested
TEMP-R3 Temporary Residential Accommodation	Support in part	There doesn't appear to be any consideration of wastewater associated with temporary residential accommodation.	Amend either the definition or the rule to ensure that the temporary residential accommodation is either associated with a residential dwelling or self-contained.
TEMP-R4 Community Markets	Neutral		No change requested
TEMP-R5 Filming	Neutral		No change requested
TEMP-R6 Temporary Military Training Activity or Temporary Emergency Services Training Activities	Neutral		No change requested

TEMP-S1 Location of Buildings	Neutral		No change requested
TEMP-S2 Site Restoration	Support		No change requested
TEMP-MD1 Temporary Activity Duration	Support		No change requested

Natural Open Space Zone

29. Environment Canterbury makes the following submission on the proposed Natural Open Space Zone (NOSZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
NOSZ-O1 Zone Purpose	Support	<p>This zone covers Aoraki Mt Cook National Park. The Department of Conservation National Park Management Plan (NPMP) manages most activities. The NFL chapter does not apply in this zone even though it is identified in the district plan as an ONL. Landscape is managed under the NPMP instead.</p> <p>NPMP Objective 1: To preserve in perpetuity in their natural state, as far as possible, the landscapes, indigenous ecosystems and natural features of Aoraki/Mount Cook National Park.</p> <p>NPMP 4.1.2. Landscape Management policies:</p>	No change requested

		The policies give effect to the CRPS provisions, including CRPS Objective 12.2.1 and Policy 12.3.2.	
NOSZ-P1 Aoraki/Mt Cook National Park management Plan, National Parks Act 1980 and Conservation Act 1987	Support	Only manage activities where additional controls are needed	No change requested

Open Space Zone

30. Environment Canterbury makes the following submission on the proposed Open Space Zone (OSZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
OSZ-O1 Zone Purpose	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3. This zone includes Tākapo Regional Park. Environment Canterbury supports the Open Space zoning for the Park.	No change requested
OSZ-O2 Zone Character and Amenity Values	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
OSZ-P1 Recreational Activities	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
OSZ-P2 Compatible Activities	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested

OSZ-P3 Other Activities	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
OSZ-P4 Built Form	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
OSZ-R1 Recreational Activities	Support		No change requested
OSZ-R2 The Establishment or Expansion of Walking and Cycling Tracks	Support		No change requested
OSZ-R3 Conservation Activity	Support		No change requested
OSZ-R4 Landscaping	Support		No change requested
OSZ-R5 Buildings and Structures	Support		No change requested
OSZ-R6 Commercial Recreation Activities	Support		No change requested
OSZ-R7 Community Facilities	Support		No change requested
OSZ-R8 Car Parking	Support		No change requested
OSZ-R9 Activities Not Otherwise Listed	Support		No change requested

OSZ-R10 Residential Units and Residential Activities	Support		No change requested
OSZ-R11 Industrial Activities	Support		No change requested
OSZ-S1 Height	Support		No change requested
OSZ-S2 Setbacks	Support		No change requested
OSZ-S3 Coverage	Support		No change requested
OSZ-S4 Reflectivity	Support		No change requested

Sport and Active Recreation Zone

31. Environment Canterbury makes the following submission on the proposed Sport and Active Recreation Zone (SARZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
SARZ-O1 Zone Purpose	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
SARZ-O2 Zone Character and Amenity Values	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
SARZ-P1 Recreation	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
SARZ-P2 Compatible Activities	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
SARZ-P3 Other Activities	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested

SARZ-P4 Specific Control Area 14 (Ruataniwha)	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
SARZ-P5 Built Form	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
SARZ-R1 Recreational Activities	Support		No change requested
SARZ-R2 Commercial Recreation Activities	Support		No change requested
SARZ-R3 The Establishment or Expansion of Walking and Cycling Tracks	Support		No change requested
SARZ-R4 Conservation Activity	Support		No change requested
SARZ-R5 Landscaping	Support		No change requested
SARZ-R6 Visitor Accommodation	Support		No change requested
SARZ-R7 Buildings and Structures	Support		No change requested
SARZ-R8 Parking Areas	Support		No change requested
SARZ-R9 Food and Beverage Outlet	Support		No change requested

SARZ-R10 Retail Activity	Support		No change requested
SARZ-R11 Residential Units and Residential Activities	Support		No change requested
SARZ-R12 Community Facilities	Support		No change requested
SARZ-R13 Activities Not Otherwise Listed	Support		No change requested
SARZ-R14 Industrial Activities	Support		No change requested
SARZ-S1 Height	Support		No change requested
SARZ-S2 Height in Relation to Boundary	Support		No change requested
SARZ-S3 Setbacks	Support		No change requested
SARZ-S4 Coverage	Support		No change requested
SARZ-S5 Reflectivity	Support		No change requested
SARZ-S6 Servicing	Support	Gives effect to CRPS Policy 5.3.5.	No change requested

Takapō / Lake Tekapo Precinct

32. Environment Canterbury makes the following submission on the proposed changes to the Takapō / Lake Tekapo Precinct (PREC1) Chapter:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support		No change requested
PREC1-R1	Support		No change requested
PREC1-S2 Roofs	Support		No change requested
PREC1-S3 Building Scale	Support		No change requested

Submission on Plan Change 30 (Special Purpose Zones), Variation 2 to Plan Change 23, Variation 3 to Plan Change 26 and Variation 3 to Plan Change 27

Definitions

33. Environment Canterbury makes the following submission on definitions to be added to the Mackenzie District Plan through PC30:

Definition	Support / Oppose	Comments	Change requested
Airport Activity	Support		No change requested
Airport Building	Support		No change requested
Airport support activity	Support		No change requested
Aviation related visitor accommodation	Support		No change requested

Infrastructure

34. Environment Canterbury makes the following submission on the proposed changes to the Infrastructure (INF) Chapter introduced under Variation 3 to Plan Change 26:

Provision	Support / Oppose	Comments	Change requested
INF-R8 New Lines and Associated Support Structures Including Towers and Poles	Support	Note this rule is currently subject to appeal.	No change requested

Natural Character

35. Environment Canterbury makes the following submission on the proposed changes to the Natural Character (NATC) Chapter introduced under Variation 2 to Plan Change 23:

Provision	Support / Oppose	Comments	Change requested
Table NATC-1: Surface Waterbody Setbacks	Support	Gives effect to CRPS Policy 7.3.1.	No change requested

Subdivision

36. Environment Canterbury makes the following submission on the proposed changes to the Subdivision (SUB) Chapter introduced under Variation 3 to Plan Change 27:

Provision	Support / Oppose	Comments	Change requested
SUB-R10 Subdivision Wholly or Partly Within any Open Space and Recreation Zone or Accommodation Special Purpose Zone	Support	Additional zone added.	No change requested
SUB-R11 Subdivision Within the PDSPZ	Support		No change requested
SUB-R11A Subdivision Within the PVSPZ	Support	New rule.	No change requested

Earthworks

37. Environment Canterbury makes the following submission on the proposed changes to the Earthworks (EW) Chapter introduced under Variation 3 to Plan Change 27:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support		No change requested
EW-R3 Earthworks not Specified in EW-R1, or EW-R2	Support		No change requested

Airport Special Purpose Zone

38. Environment Canterbury makes the following submission on the proposed Airport Special Purpose Zone (AIRPZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
AIRPZ-O1 Zone purpose	Support	Gives effect to CRPS Objectives 5.2.1 and 5.2.2	No change requested
AIRPZ-O2 Zone Character and Amenity Values	Support	Gives effect to CRPS Policies 5.3.3 and 5.3.8	No change requested
AIRPZ-P1 Airport and Supporting Activity	Support	Gives effect to CRPS Objectives 5.2.1 and 5.2.2 and Policies 5.3.3 and 5.3.8.	No change requested
AIRPZ-P2 Other Activities	Support	Gives effect to CRPS Objective 5.2.2 and Policy 5.3.9	No change requested
AIRPZ-R1 Airport Activity	Support		No change requested
AIRPZ-R2 Airport Support Activity	Support		No change requested

AIRPZ-R3 Residential Unit / Residential Activity	Support		No change requested
AIRPZ-R4 Staff Accommodation	Support		No change requested
AIRPZ-R5 Aviation Related Visitor Accommodation	Support		No change requested
AIRPZ-R6 Earthworks	Support		No change requested
AIRPZ-R7 Conservation Activity	Support		No change requested
AIRPZ-R8 Activities Not Otherwise Listed	Support		No change requested
AIRPZ-R9 Residential Visitor Accommodation	Support		No change requested
AIRPZ-R10 Commercial Visitor Accommodation	Support		No change requested
AIRPZ-R11 Planting of any Wilding Conifers	Support		No change requested
AIRPZ-S1 Boundary Setbacks	Support		No change requested
AIRPZ-S2 Height	Support		No change requested
AIRPZ-S3 Exterior Cladding of Buildings and Structures	Support		No change requested

AIRPZ-S4 Landscaping	Support		No change requested
AIRPZ-S5 Outdoor Storage	Support		No change requested
AIRPZ-S6 Water Supply for Firefighting	Support		No change requested
AIRPZ-S7 Building Footprint	Support		No change requested
AIRPZ-S8 Wastewater	Support		No change requested
AIRPZ-S9 Airport Height Restrictions	Support		No change requested

Accommodation Special Purpose Zone

39. Environment Canterbury makes the following submission on the proposed Accommodation Special Purpose Zone (ASPZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
ASPZ-O1 Zone Purpose	Neutral		No change requested
ASPZ-O2 Zone Character and Amenity Values	Neutral		No change requested
ASPZ-P1 Visitor Accommodation	Neutral		No change requested
ASPZ-P2 Compatible Activities	Neutral		No change requested
ASPZ-P3 Other Activities	Neutral		No change requested

ASPZ-P4 Built Form	Neutral		No change requested
ASPZ-R1 Commercial Visitor Accommodation	Neutral		No change requested
ASPZ-R2 Residential Activities	Neutral		No change requested
ASPZ-R3 Food and Beverage Outlet	Neutral		No change requested
ASPZ-R4 Buildings and Structures	Neutral		No change requested
ASPZ-R5 Commercial Activities Not Otherwise Listed	Neutral		No change requested
ASPZ-R6 Community Facilities	Neutral		No change requested
ASPZ-R7 Activities Not Otherwise Listed	Neutral		No change requested
ASPZ-R8 Industrial Activities	Neutral		No change requested
ASPZ-S1 Height	Neutral		No change requested
ASPZ-S2 Height in Relation to Boundary	Neutral		No change requested
ASPZ-S3 Setbacks	Neutral		No change requested

ASPZ-S4 Outdoor Storage	Neutral		No change requested
ASPZ-S5 Coverage	Neutral		No change requested
ASPZ-S6 Reflectivity	Neutral		No change requested
ASPZ-S7 Servicing	Neutral		No change requested

Glentanner Special Purpose Zone

40. Environment Canterbury makes the following submission on the proposed Glentanner Special Purpose Zone (GSPZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support in Part	Request minor wording change to be consistent with the Natural Hazards chapter under PC28 and other provisions in this section.	Amend introduction as follows: ...Development constraints to avoid hazards from landslip-erosion-landslides and flooding have been applied to the area south of Twin Stream...
GSPZ-O1 Zone Purpose	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.2	No change requested
GSPZ-O2 Zone Character and Amenity Values	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.2	No change requested
GSPZ-P1 Development in the GSPZ	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.2	No change requested
GSPZ-P2 Tourist Development Area	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.2	No change requested

GSPZ-P3 Ecological Open Space	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.2	No change requested
GSPZ- P4 Airport Area	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.2	No change requested
GSPZ-R1 Building and Structures (Excluding Airport Buildings)	Support		No change requested
GSPZ-R2 Airport Buildings	Support		No change requested
GSPZ-R3 Conservation Activity	Support		No change requested
GSPZ-R4 Recreational Activity	Support		No change requested
GSPZ-R5 Rural Tourism Activity	Support		No change requested
GSPZ-R6 Primary Production	Support		No change requested
GSPZ-R7 Residential Activity	Support		No change requested
GSPZ-R8 Commercial Activity	Support		No change requested
GSPZ-R9 Commercial Visitor Accommodation, Residential Visitor Accommodation, Camping Grounds	Support		No change requested

GSPZ-R10 Earthworks	Support		No change requested
GSPZ-R11 Staff Accommodation	Support		No change requested
GSPZ-R12 Airport Activity	Support		No change requested
GSPZ-R13 Airport Support Activity	Support		No change requested
GSPZ-R14 Aviation Related Visitor Accommodation	Support		No change requested
GSPZ-R15 Activities Not Otherwise Listed	Support		No change requested
GSPZ-R16 Buildings and Structures Not Otherwise Listed	Support		No change requested
GSPZ-R17 industrial Activities	Support		No change requested
GSPZ-R18 Commercial Forestry and Woodlots	Support		No change requested
GSPZ-R19 Planting of Wilding Conifers	Support		No change requested
GSPZ-S1 Boundary Setbacks	Support		No change requested
GSPZ-S2 Height	Support		No change requested

GSPZ-S3 Exterior Cladding of Buildings and Structures	Support		No change requested
GSPZ-S4 Coverage	Support		No change requested
GSPZ-S5 Fencing	Support		No change requested
GSPZ-S6 Outdoor Storage	Support		No change requested
GSPZ-S7 Water Supply for Firefighting	Support		No change requested
GSPZ-S8 Building Footprint	Support		No change requested
GSPZ-S9 Wastewater	Support		No change requested
GSPZ-S10 Airport Height Restrictions	Support		No change requested

Pūkaki Downs Special Purpose Zone

41. Environment Canterbury makes the following submission on the proposed Pūkaki Downs Special Purpose Zone (PDSPZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
PDSPZ-O1 Zone Purpose	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PDSPZ-O2 Zone Character and Amenity Values	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested

PDSPZ-P1 Outline Development Plan Process	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PDSPZ-P2 Compatible Activities in BDA 1-5	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PDSPZ-P3 Other Activities in BDA 1-5	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PDSPZ-P4 Activities within LMA 1-5	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PDSPZ-R1 Approval or Outline Development Plans	Support		No change requested
PDSPZ-R2 Residential Units	Support		No change requested
PDSPZ-R3 Residential Accessory Buildings and Structures	Support		No change requested
PDSPZ-R4 Buildings and Structures Not Otherwise Listed	Support		No change requested
PDSPZ-R5 Commercial Visitor Accommodation Activities	Support		
PDSPZ-R6 Commercial Activities	Support		No change requested

PDSPZ-R7 Recreational Activities	Support		No change requested
PDSPZ-R8 Commercial Recreational Activities	Support		No change requested
PDSPZ-R9 Primary Production Activities	Support		No change requested
PDSPZ-R10 Earthworks	Support		No change requested
PDSPZ-R11 Helicopter Movements	Support		No change requested
PDSPZ-R12 Helicopter Landing Areas	Support		No change requested
PDSPZ-R13 Conservation Activities	Support		No change requested
PDSPZ-R14 Commercial Forestry and Woodlots	Support		No change requested
PDSPZ-R15 Activities Not Otherwise Listed	Support		No change requested
PDSPZ-R16 Industrial Activities	Support		No change requested
PDSPZ-R17 Intensive Primary Production, Mining and Quarrying Activities	Support		No change requested

PDSPZ-R18 Planting of any Wilding Conifer Species	Support		No change requested
PDSPZ-S1 Density	Support		No change requested
PDSPZ-S2 Height	Support		No change requested
PDSPZ-S3 Setbacks	Support		No change requested
PDSPZ-S4 Coverage	Support		No change requested
PDSPZ-S5 Exterior Cladding of Buildings and Structures	Support		No change requested
PDSPZ-S6 Fencing	Support		No change requested
PDSPZ-S7 Outdoor Storage	Support		No change requested
PDSPZ-S8 Servicing – Water Supply	Support		No change requested
PDSPZ-S9 Servicing- Wastewater	Support		No change requested
PDSPZ-S10 Servicing – Stormwater	Support		No change requested
PDSPZ-S11 Commercial Visitor accommodation	Support		No change requested

PDSPZ-S12 Commercial Activities	Support		No change requested
PDSPZ-MD1 Scale, Location and Design	Support		No change requested
PDSPZ-MD2 Compatible Activities	Support		No change requested
PDSPZ-MD3 Access and Infrastructure	Support		No change requested
PDSPZ-MD4 Earthworks	Support		No change requested
PDSPZ-MD5 Ecology	Support		No change requested
PDSPZ-MD6 Landscape	Support		No change requested

Pūkaki Village Special Purpose Zone

42. Environment Canterbury makes the following submission on the proposed Pūkaki Village Special Purpose Zone (PVSPZ) Chapter:

Provision	Support / Oppose	Comments	Change requested
PVSPZ-O1 Zone Purpose	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PVSPZ-O2 Zone Character and Amenity Values	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PVSPZ-P1 Outline Development Plan Process	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested

PVSPZ-P2 Compatible Activities in LMA 1-3	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PVSPZ-P3 Other Activities in LMA 1-3	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PVSPZ-P4 Activities and Development in LMA 4	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PVSPZ-P5 Anticipated Activities within LMA 1-4	Support	Gives effect to CRPS Objective 5.2.1 and Policy 5.3.3.	No change requested
PVSPZ-R1 Approval of Outline Development Plan	Support		No change requested
PVSPZ-R2 Buildings and Structures	Support		No change requested
PVSPZ-R3 Residential Activity	Support		No change requested
PVSPZ-R4 Commercial Visitor Accommodation Activities	Support		No change requested
PVSPZ-R5 Commercial Activities	Support		No change requested
PVSPZ-R6 Recreational Activities	Support		No change requested

PVSPZ-R7 Commercial Recreational Activities	Support		No change requested
PVSPZ-R8 Earthworks	Support		No change requested
PVSPZ-R9 Community Activities	Support		No change requested
PVSPZ-R10 Helicopter Movements	Support		No change requested
PVSPZ-R11 Helicopter Landing Areas	Support		No change requested
PVSPZ-R12 Conservation Activities	Support		No change requested
PVSPZ-R13 Activities Not Otherwise Listed	Support		No change requested
PVSPZ-R14 Industrial Activities	Support		No change requested
PVSPZ-R15 Intensive Primary Production, Mining and Quarrying Activities	Support		No change requested
PVSPZ-R16 Commercial Forestry and Woodlots	Support		No change requested
PVSPZ-R17 Planting of any	Support		No change requested

Wilding Conifer Species			
PVSPZ-S1 Height	Support		No change requested
PVSPZ-S2 Setbacks	Support		No change requested
PVSPZ-S3 Coverage	Support		No change requested
PVSPZ-S4 Exterior Cladding of Buildings and Structures	Support		No change requested
PVSPZ-S5 Fencing	Support		No change requested
PVSPZ-S6 Outdoor Storage	Support		No change requested
PVSPZ-S7 Servicing – Water Supply	Support		No change requested
PVSPZ-S8 Servicing – Wastewater	Support		No change requested
PVSPZ-S9 Servicing – Stormwater	Support		No change requested
PVSPZ-S10 Commercial Activities	Support		No change requested
PVSPZ-MD1 Scale, Location and Design	Support		No change requested

PVSPZ-MD2 Compatible Activities	Support		No change requested
PVSPZ-MD3 Access and Infrastructure	Support		No change requested
PVSPZ-MD4 Earthworks	Support		No change requested
PVSPZ-MD5 Ecology	Support		No change requested
PVSPZ-MD6 Landscape	Support		No change requested

Takapō / Lake Tekapo Precinct

43. Environment Canterbury makes the following submission on the proposed changes to the Takapō / Lake Tekapo Precinct (PREC1):

Provision	Support / Oppose	Comments	Change requested
Introduction	Neutral		No change requested
PREC1-R1 Buildings and Structures	Neutral		No change requested
PREC1-S2 Roofs	Neutral		No change requested
PREC1-S3 Building Scale	Neutral		No change requested
APP1 – Height in Relation to Boundary	Neutral		No change requested

Submission on the proposed Designations Chapter

44. Environment Canterbury makes the following submission on the proposed Designations chapter:

Provision	Support / Oppose	Comments	Change requested
Introduction	Support in part	Amendments suggested to clarify that the District Plan rules still apply for any activities not covered by the purpose of the designation.	<p>Amend the introduction as follows:</p> <p>...The designation authorises the requiring authority's work and activity on the site, area or route, <u>for the purpose of the designation</u>, without the need to comply with the land use rules of the District Plan. A designation:</p> <ul style="list-style-type: none"> • Enables a requiring authority to undertake the works within the designated area <u>for the purpose of the designation</u> without the need for a land use consent. • Sets the parameters under which the activity can occur...
CRC-1 Soil Conservation Reserve	Support in Part	The proposed mapping differs from the map in the operative district plan. Environment Canterbury request that the operative mapping is retained.	<p>Canterbury Regional Council requests that Section 1 SO 17373 be added to the designated area for CRC-1 Soil Conservation Reserve (Takapō Regional Park). This section should be included in both the map and the description in the Designations Chapter. The text under CRC-1 Soil Conservation Reserve, in the Designations Chapter should be amended as follows:</p> <p>Site identifier: Takapō / Lake Tekapo soil conservation reserve, southeastern end of</p>

			<p>Takapō / Lake Tekapo Sections 1 & 2 SO 11904 <u>and Section 1 SO 17373</u></p> <p>Amend the Designation overlay map as follows:</p> <p>Section 1 SO 17373 is mapped as part of the designation in the Operative District Plan but not included in the description in Appendix A.</p>
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ATTENDANCE AT THE HEARING

We wish to be heard in support of our submission.

SIGNATURE



Amanda Thompson
Team Leader, Strategy and Planning

22 January 2025