

From: MDCSendmail@mackenzie.govt.nz
Sent: Wed, 23 Nov 2022 13:39:35 +1100 (AEDT)
To: District Plan
Subject: Mackenzie District Council - Submission on Proposed Plan Change to the Mackenzie District Plan
Attachments: FINAL_Waka_Kotahi_Submission_-_Mackenzie_District_Plan_-_Plan_Change_21__22.pdf

A new Submission on Proposed Plan Change to the Mackenzie District Plan has been received.

Plan Change Number

Which Plan Change number?: 21

Details of Applicant

First Name: Waka Kotahi
Last Name: NZ Transport Agency
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Date: 2022-11-23 00:00:00
Customer number (if known):
Contact person: Livi Whyte
Contact person Telephone No: 0212297348

Submission Details

The specific provisions of the Proposal my submission relates to are as follows: Please find attached submission.
I support / oppose these provisions: I support in part
The reason(s) for my submission are: Please find attached submission.
I seek the following decision from the Mackenzie District Council: Please find attached submission.
I do or do not wish to be heard in support of my submission: I do
If others make a similar submission I would or would not be prepared to consider presenting a joint case with them at any hearing: I would

Additional information for this submission:

Please find attached submission. Please copy environmentalplanning@nzta.govt.nz into all correspondence.

Attach a supporting document:

FINAL-_Waka_Kotahi_Submission_-
_Mackenzie_District_Plan_-
_Plan_Change_21__22.pdf, type application/pdf,
359.0 KB

23 November 2022

Mackenzie District Plan Review

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

To: Mackenzie District Council
Via online submission

Name of Submitter: Waka Kotahi NZ Transport Agency
PO Box 1479
Christchurch 8011

Address for Service: Attention: Livi Whyte
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The provisions contained in the Spatial Plan Implementation and Light Chapters notified in Plan Change 21 and Plan Change 22 have the potential have a direct effect on the ability of Waka Kotahi to operate, maintain and improve the road network. This submission focuses on ensuring that Waka Kotahi's state highway assets are adequately provided in the proposed provisions and the approach to urban zones and subsequent form in the Mackenzie District align with the Waka Kotahi strategic direction that delivers on the mandate from Central Government to promote best practice transport solutions across the country. We thank Mackenzie District Council for the opportunity to engage in this process.

Waka Kotahi Statutory Functions, Powers and Responsibilities

1. The Statutory objective of Waka Kotahi under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
2. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS). It builds on the strategic direction set in the earlier GPS and has four strategic priorities: safety, better travel options, improving freight connections and climate change.
3. The 'Outcomes Framework' issued by the Ministry of Transport (MOT) defines the long-term strategic outcomes for New Zealand's transport system and explains how government and transport sector should work together toward these outcomes, being:
 - a. Inclusive Access
 - b. Economic Prosperity
 - c. Resilience and Security
 - d. Environmental Sustainability
 - e. Health and Safe People
4. Waka Kotahi supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience and safety of the transport network. Therefore, Waka Kotahi seeks to participate in these proceedings to ensure that the plan change provisions do not adversely affect the transport network and contribute to improving environmental sustainability.
5. Waka Kotahi **could not** gain an advantage in trade competition through this submission.
6. Waka Kotahi has reviewed the plan change and has the following comments:

The Waka Kotahi feedback:

Matters have been identified through the review of Plan Change 21 and Plan Change 22 of the Mackenzie District Plan, which are either in support or are seeking relief in the form of amendments or clarity. The matters raised are summarised in Table 1, which forms the bulk of our feedback.

In addition to the submission in Table 1, Waka Kotahi seeks further consideration in the Mackenzie District Plan Review of how reverse sensitivity will be managed for potentially nationally/regionally significant infrastructure.

Reverse Sensitivity

7. In the recent Section 42A report prepared for Plan Change 20, the recommending officer, Ms. Liz White, addressed the request for an amendment sought by several submitters to include provisions to address potential reverse sensitivity effects within the Strategic Directions chapters of the District Plan. Ms. White acknowledged that reverse sensitivity is a relevant issue within the Mackenzie District due to the rural resources and significant energy resources, however, in her analysis of the submissions her view was that the protection of reverse sensitivity is not an outcome in itself and rather an action undertaken to recognise and provide for the protection of significant infrastructure and assets within the District. On that basis, it was recommended ATC-O3, ATC-O4 and UFD-O1 not be amended to include reference to reverse sensitivity.
8. In Ms. White's analysis it was also noted "*I therefore do not consider that protection from reverse sensitivity should explicitly be included in the Strategic Directions objectives. Rather, I consider that it is more appropriate to include direction relating to reverse sensitivity in other chapters within the District Plan, where such direction is appropriate to achieve Strategic Objectives.*"
9. Whilst aspects of objectives and policies contained in Plan Change 21 & 22 address reverse sensitivity effects within some of the proposed zone chapters, these directly relate to activities that may occur within the zones that are incompatible with those anticipated within each of the respective zones, rather than the risk to potential reverse sensitivity effects on regionally significant infrastructure.
10. Selwyn District Council have recently undertaken a review of the District Plan and have included a strategic direction that seeks to ensure "important infrastructure needs of the community are fulfilled, and their operation is protected." This does not explicitly reference 'reverse sensitivity', but it does recognise the need to protect regionally significant infrastructure within the district.
11. Although it is acknowledged that reverse sensitivity may be viewed as an outcome and therefore is not deemed appropriate to form part of the Strategic Objectives, Waka Kotahi seek further clarification from the Council on how this will be addressed in future chapters (other than zones) of the District Plan, particularly in relation to Infrastructure. Waka Kotahi would appreciate an opportunity to discuss this further with the Council.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing. We would appreciate an opportunity to meet and/or discuss our submission with the Council and to provide assistance to the Council where appropriate.

Signed by:



Richard Shaw
Team Leader – Poutiaki Taiao | Environmental Planning
Waka Kotahi NZ Transport Agency
Pursuant to authority delegated by Waka Kotahi NZ Transport Agency

Date: 23 November 2022

Table 1: Decisions Sought on Plan Change 21 & 22 of the Mackenzie District Plan

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Plan Change 21 – Spatial Plan Implementation				
General Comments				
Waka Kotahi seek clarification if there will be a separate section in the District Plan that will provide guidance on how to use the Plan and to include a description noting that multiple chapters may apply to an activity when applying for resource consent. Based on the notified chapters, the zones do not explicitly note that other relevant chapters may apply such as Transport or Noise.				
Whilst reverse sensitivity effects have been considered in the relevant zone chapters, Waka Kotahi seeks further clarification how this will be addressed in the District Plan in relation to regionally significant infrastructure and potential adverse effects.				
The objectives in the zone chapters are supported to retain the character of the zones and restrict incompatible activities as this will provide for consolidated urban form and provide for walkable townships within the Mackenzie District.				
Part 1 – Abbreviations & Definitions				
Definitions				
Definitions	Access	Support	Waka Kotahi supports the inclusion of a definition for access and considers definition from the Operative District Plan appropriate.	Retain as notified.
	Road	Support	Waka Kotahi supports the National Planning Standard definition of road being adopted and acknowledges no changes can be made to the definition.	Retain as notified.
Part 3 – Area Specific Matters				
Residential Zones				
LLRZ – Large Lot Residential Zone				
Large Lot Residential Zone Objectives	LLRZ-O1	Support	Waka Kotahi supports the objective to maintain the Large Lot Residential Zone for residential living opportunities and small non-residential activities ancillary to residential activities.	Retain as notified.
	LLRZ-O2	Support	It is supported that the LLRZ maintains predominance of open space and spacious character and amenity values of adjacent sites.	Retain as notified.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Large Lot Residential Zone Policies	LLRZ-P2	Support	Waka Kotahi supports the intent of the policy to provide for compatible activities that are ancillary to residential activities and that remain consistent with the zone and the amenity of adjacent sites.	Retain as notified.
	LLRZ-P3	Support	<p>Waka Kotahi largely supports the intent of the policy to provide for workers accommodation while maintaining sufficient parking and servicing on site and ensuring parking and vehicle manoeuvring areas are appropriately designed and road safety and efficiency is maintained.</p> <p>Further clarification is sought on the intended meaning of 'sufficient parking' and 'adequate parking' where these terms are used in the Plan, as the National Policy Statement on Urban Development 2020 (NPS-UD) required all district plans to remove and not set any minimum car parking rate requirements, other than for accessible car parks. It is acknowledged Policy 11 of the NPS-UD encourages councils to manage effects associated with supply and demand of car parking through comprehensive parking management plans.</p>	<p>Provide clarification on the intended threshold for 'sufficient parking' in relation to workers accommodation in the LLRZ.</p> <p>Provide clarification on the intended meaning of 'sufficient parking' and 'adequate parking' where these terms are used in the Plan.</p>
Large Lot Residential Zone Rules	LLRZ-R2	Support	Waka Kotahi is supportive of providing for minor residential units that are subservient to the primary residential unit on the site.	Retain as notified.
	LLRZ-R5	Support in part	<p>Waka Kotahi supports the provision for one residential unit on a site unit for residential visitor accommodation, including a minor residential unit.</p> <p>Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.</p>	Provide clarification on the intended threshold for 'adequate onsite parking' will be for residential visitor accommodation in the LLRZ.
MRZ – Medium Density Residential Zone				
Medium Density Residential Zone Objectives	MRZ-O1	Support	Waka Kotahi is supportive of the intent of the objective to provide for higher density living opportunities within the medium Density Residential Zone.	Retain as notified.
	MRZ-O2	Support	The objective is supported as it provides for a desirable, higher density, residential living environment, while maintain the amenity of adjacent sites.	Retain as notified.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Medium Density Residential Zone Policies	MRZ-P2	Support	Waka Kotahi supports the intent of the policy to provide for compatible activities that are ancillary to residential activities and that remain consistent with the zone and the amenity of adjacent sites.	Retain as notified.
	MRZ-P3	Support	The policy is supported as it seeks to provide for retirement living where any parking and vehicle manoeuvring provided onsite is appropriately designed.	Retain as notified.
	MRZ-P5	Support	It is supported that development within the Medium Density Residential Zone ensures that within Specific Control Area 3 that the safety and efficiency of State Highway 8 is maintained.	Retain as notified.
Medium Density Residential Zone Rules	MRZ-R4	Support in part	Waka Kotahi supports the provision for one residential unit on a site unit for residential visitor accommodation, including a minor residential unit. Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on the intended threshold for 'adequate onsite parking' will be for residential visitor accommodation within the MRZ.
	MRZ-R7	Support in part	Waka Kotahi supports the provision for expansion to existing education facilities, or that is undertaken within or ancillary to an existing residential unit and were the maximum number of children in attendance is six at any time. Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on the intended threshold for 'adequate onsite parking' will be for education facilities within the MRZ.
	MRZ-R8	Support in part	Waka Kotahi supports the provision for the expansion of existing community facilities beyond those provided for in MRZ-R6. Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on the intended threshold for 'adequate onsite parking' will be for existing community facilities within the MRZ.
	MRZ-R9	Support in part	Waka Kotahi supports the provision for retirement villages.	Provide clarification on the intended threshold for 'adequate onsite parking'

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	will be for retirement villages within the MRZ
	MRZ-R10	Support in part	<p>The rule is supported for the expansion of existing industrial activities as a restricted discretionary activity. The proposed matters of discretion consider the traffic impacts, including provision of adequate onsite parking and loading areas. However, the inclusion of 'the impacts on the wider transport network' is sought.</p> <p>Waka Kotahi also seeks that an amendment refers to the relevant transport provisions.</p> <p>Additionally, in relation to matter of discretion (c) clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.</p>	<p>Amendment sought as follows:</p> <p><i>c. The traffic impacts including the provision of adequate onsite parking and loading areas, and the impacts on the wider transport network.</i></p> <p>Amend the rule to require compliance with the Transport Chapter.</p> <p>Provide clarification on what the threshold for 'adequate onsite parking', on directive of NPS-UD.</p>
Medium Density Residential Zone Standards	MRZ-S6	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not creating shading effects or obscure visibility from accesses.
	MRZ-S9	Support in part	Waka Kotahi requests the rule is amended to require fence posts adjacent to the state highways have a maximum diameter of 100mm so they are considered frangible in the event of being struck by an errant vehicle.	<p>Amendment sought to rule to insert the following provision:</p> <ol style="list-style-type: none"> 1. <i>All fencing along the boundary shall be: ...</i> 2. <i>Any fencing adjacent to a State Highway must not have a maximum diameter that exceed 100mm.</i>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	MRZ-S10	Support	The standard is supported which requires activities to obtain vehicular access from Lakeside Drive to State Highway 8 and any direct access will be classed as a non-complying activity.	Retain as notified.
LRZ – Low Density Residential Zone				
Low Density Residential Zone Objectives	LRZ-O1	Support	Waka Kotahi supports the objective which seeks to provide for residential living opportunities and other compatible activities that are consistent with the character and amenity values of the zone.	Retain as notified.
Low Density Residential Zone Policies	LRZ-P2	Support	Waka Kotahi supports the intent of the policy to provide for compatible activities that are ancillary to residential activities and that remain consistent with the zone and the amenity of adjacent sites.	Retain as notified.
	LRZ-P3	Support in part	Waka Kotahi largely supports the intent of the policy to provide for workers accommodation while maintaining sufficient parking and servicing on site and ensuring parking and vehicle manoeuvring areas are appropriately designed and road safety and efficiency is maintained. Further consideration is sought to the intended meaning of ‘sufficient parking’ as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on the intended threshold for ‘sufficient parking’ for workers accommodation within the LRZ.
	LRZ-P4	Support	The policy is supported, which provides for retirement living where any parking and vehicle manoeuvring is appropriately designed, and road safety and efficiency is maintained.	Retain as notified.
Low Density Residential Zone Rules	LRZ-R2	Support	Waka Kotahi is supportive of providing for minor residential units that are subservient to the primary residential unit on the site.	Retain as notified.
	LRZ-R5	Support in part	Waka Kotahi supports the provision for one residential unit on a site unit for residential visitor accommodation, including a minor residential unit. Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on the intended threshold for adequate onsite parking for residential visitor accommodation within the LRZ.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	LRZ-R9	Support in part	<p>Waka Kotahi supports the provision for the expansion of existing community facilities beyond those provided for in LRZ-R7.</p> <p>Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.</p>	Provide clarification on the intended threshold for 'adequate onsite parking' will be for existing community facilities within the LRZ.
	LRZ-R10	Support in part	<p>The rule is supported for the establishment of retirement villages as a restricted discretionary activity. The proposed matters of discretion consider the traffic impacts, including provision of adequate onsite parking and the impacts on the wider transport network.</p> <p>Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.</p>	Provide clarification on the intended threshold for adequate onsite parking' for retirement villages within the LRZ
	LRZ-R11	Support in part	<p>The rule is supported for the expansion of existing industrial activities as a restricted discretionary activity. The proposed matters of discretion consider the traffic impacts, including provision of adequate onsite parking and loading areas. However, the inclusion of 'the impacts on the wider transport network' is sought.</p> <p>Waka Kotahi also seeks that an amendment refers to the relevant transport provisions.</p> <p>Additionally, in relation to matter of discretion (c) clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.</p>	<p>Amendment sought as follows:</p> <p><i>c. The traffic impacts including the provision of adequate onsite parking and loading areas, and the impacts on the wider transport network.</i></p> <p>Amend the rule to require compliance with the Transport Chapter.</p> <p>Provide clarification on what the threshold for 'adequate onsite parking', on directive of NPS-UD.</p>
RESZ – Residential – Matters of Discretion				
Residential Zones Matters of Discretion	RESZ-MD5	Support in part	Waka Kotahi seeks an amendment to add a matter of discretion which takes into consideration the level the landscaping is reduced to provide for visibility to the roading network.	Amendment sought to include a matter of discretion that relates to traffic safety.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			Waka Kotahi also seek amendment to remove '?' from matter of discretion MD5b.	Amend matter of discretion to remove grammatical error.
Commercial and Mixed Use Zones				
NCZ – Neighbourhood Centre Zone				
Neighbourhood Centre Zone Policies	NCZ-P3	Support in part	Waka Kotahi seeks further consideration of adverse effects in relation to safety of all transport users within the Neighbourhood Centre Zone.	Further consideration.
Neighbourhood Centre Zone Standards	NCZ-S4	Support	The standard is supported by Waka Kotahi as it requires all outdoor storage of goods and any servicing areas to be screened from any public space or adjoining residential site by a fence no less than 1.8m in height or dense planting. This is supported as it will minimise distraction from users of the transport network.	Retain as notified.
	NCZ-S6	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not creating shading effects or obscure visibility from accesses.
LFRZ – Large Format Retail Zone				
General comments	Zone Layer	Support in part	It is acknowledged that the proposed rezoning of the Large Format Retail Zone is in the location of Industrial Zoned land in the Operative Mackenzie District Plan. Waka Kotahi seeks further clarification around how the proposed traffic effects and the safety of all transport users due to the rezoning will be managed in this location, particularly as Tekapo Powerhouse Road is a private road. If access is required directly to the State Highway from the site, controls may be required, for example a threshold for an Integrated Transport Assessment (ITA) or Higher Trip Generator rule, which might be addressed in future plan changes.	Further clarification is sought to potential safety of all transport users of the upzoning of the land from Industrial Zone to Large Format Retail Zone.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Large Format Retail Zone Objectives	LFRZ-O2	Support	The objective is supported as it seeks to manage adverse effects while recognising the functional and operational requirements of activities in the zone, maintain a reasonable level of amenity within the zone and amenity values anticipated in adjoining areas.	Retain as notified.
	LFRZ-P2	Support	Waka Kotahi supports the intent of the policy to avoid activities that will result in reverse sensitivity effects on activities that are supported in the zone.	Retain as notified.
Large Format Retail Zone Policies	LFRZ-P3	Support in part	Waka Kotahi seeks further consideration of adverse effects in relation to safety of all transport users within the Large Format Retail Zone as it has the potential to increase vehicle movements in this location.	Further consideration of safety of all transport users.
	LFRZ-S4	Support	The standard is supported by Waka Kotahi as it requires all outdoor storage of goods and any servicing areas to be screened from any public space or adjoining residential site by a fence no less than 1.8m in height or dense planting. This is supported as it will minimise distraction from users of the transport network.	Retain as notified.
Large Format Retail Zone Standards	LFRZ-S6	Support in part	Waka Kotahi supports the intention of the standard, particularly as all road boundaries 'except across entrance ways' shall be landscaped, however, it is sought that clarification is provided to ensure the landscaping does not compromise the safety of accesses including description of visibility splay. The operative Christchurch District Plan contains a provision to control landscaping around accesses (Appendix 7.5.9). Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not creating shading effects or obscure visibility from accesses.
	MUZ – Mixed Use Zone			
Mixed Use Zone Policies	MUZ-P2	Support	Waka Kotahi supports the intent of the policy to provide for compatible activities that are ancillary to residential activities and that remain consistent with the zone and the amenity of adjacent sites.	Retain as notified.
	MUZ-P3	Support in part	Waka Kotahi seeks further consideration of adverse effects in relation to safety of all transport users within the Mixed Use Zone.	Further consideration.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Mixed Use Zone Rules	MUZ-R2	Support	Waka Kotahi is supportive of providing for minor residential units that are subservient to the primary residential unit on the site.	Retain as notified.
	MUZ-R5	Support in part	Waka Kotahi supports the provision for one residential unit on a site unit for residential visitor accommodation, including a minor residential unit. Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on the intended threshold for adequate onsite parking' for residential visitor accommodation within the MUZ.
Mixed Use Zone Standards	MUZ-S5	Support	The standard is supported by Waka Kotahi as it requires all outdoor storage of goods and any servicing areas to be screened from any public space or adjoining residential site by a fence no less than 1.8m in height or dense planting. This is supported as it will minimise distraction from users of the transport network.	Retain as notified.
	MUZ-S7	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not creating shading effects or obscure visibility from accesses.
TCZ – Town Centre Zone				
Town Centre Zone Objectives	TCZ-O1	Support	The objective is supported as it seeks to ensure the Town Centre Zone is the primary retail destination in the district that is a focal point for the community.	Retain as notified.
Town Centre Zone Policies	TCZ-P2	Support	Waka Kotahi supports the intent of the policy to provide for compatible activities within the Town Centre Zone that contribute to the vibrancy or vitality of the zone.	Retain as notified.
	TCZ-P3	Support in part	Waka Kotahi seeks further consideration of adverse effects in relation to safety of all transport users within the Town Centre Zone.	Further consideration of safety of all transport users.
Town Centre Zone	TCZ-S5	Support	The standard is supported by Waka Kotahi as it requires all outdoor storage of goods and any servicing areas to be screened from any public space or adjoining residential site by a fence no less than 1.8m in height or dense	Retain as notified.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Standards			planting. This is supported as it will minimise distraction from users of the transport network.	
	TCZ-S6	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not creating shading effects or obscure visibility from accesses.
CMUZ – Commercial – Matters of Discretion				
Commercial and Mixed Use Zones Matters of Discretion	CMUZ-MD6	Support	Waka Kotahi supports the inclusion of CMUZ-MD6 as it considers if the reduction of road boundary landscaping is appropriate to address a traffic safety matter. This ensures that when it is required landscaping can be reduced to improve the safety of the transport network so that any planting does not create shading or icing or obscure visibility.	Retain as notified.
General Industrial Zone				
GIZ – General Industrial Zone				
General Industrial Zone Objectives	GIZ-O1	Support	The objective is supported as it seeks to maintain the industrial zone for industrial activities and other compatible activities.	Retain as notified.
General Industrial Zone Policies	GIZ-P2	Support	The policy is supported as it seeks to avoid incompatible activities from establishing in the General Industrial Zone unless they do not result in reverse sensitivity effects.	Retain as notified.
	GIZ-P3	Support in part	Waka Kotahi seeks further consideration of adverse effects in relation to safety of all transport users within the General Industrial Zone.	Further consideration sought of safety of all transport users.
General Industrial Zone Standards	GIZ-S4	Support	The standard is supported by Waka Kotahi as it requires all outdoor storage of goods and any servicing areas to be screened from any public space or adjoining residential site by a fence no less than 1.8m in height or dense	Retain as notified.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			planting. This is supported as it will minimise distraction from users of the transport network.	
	GIZ-S6	Support in part	Waka Kotahi supports the intention of the standard, however it is sought that clarification is provided to ensure the landscaping does not compromise the safety of accesses. Any landscaping should not create shading or icing issues, obstruct visibility of vehicles crossings or traffic signs.	Amend rule to ensure landscaping does not creating shading effects or obscure visibility from accesses.
Precincts				
PREC2 – Commercial Visitor Accommodation				
Commercial Visitor Accommodation Policies	PREC2-P1	Support	Waka Kotahi supports the intent of the policy to provide for commercial visitor accommodation where any parking and vehicle manoeuvring on the site is appropriately designed.	Retain as notified.
Commercial Visitor Accommodation Rules	PREC2-R1	Support in part	The rule is supported by Waka Kotahi as Commercial Visitor Accommodation is classed as a restricted discretionary. Matter of discretion (b) is also supported, which considers impacts on traffic, however clarification is sought on the requirement for adequate onsite parking as the NPS-UD does not provide for minimum car parking requirements.	Provide clarification on what the threshold for 'adequate onsite parking' will be.
Development Areas				
DEV1 – Takapō / Lake Tekapo West Future Development Area				
Takapō / Lake Tekapo West Future Development Area Objectives	DEV1-O1	Support	The objective is supported by Waka Kotahi as it seeks to ensure the Takapō/Lake Tekapo West Development Area is developed to provide residential living opportunities is integrated with infrastructure.	Retain as notified.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
Part 4 – Appendices and Maps				
Maps				
Additional Overlays	Geospatial Overlay	Support in part	Insert geospatial overlay to define boundaries of the Aoraki Mackenzie International Dark Sky Reserve in the District Planning Maps (ePlan). Further detail is provided in LIGHT-S4 on how the overlay applies to the Standards in the District Plan.	Request a geospatial overlay to be added to the District Planning Maps to indicate boundaries of the Aoraki Mackenzie International Dark Sky Reserve.
Plan Change 22 – Lighting				
General Comments				
General Comments		Neutral	Objectives and policies provide for outdoor lighting to maintain the safe operation of the transport network, but there is no provision for street lighting and associated light standards to directly provide for this.	Further consideration is sought for how street light network will be provided for through the proposed Light Chapter.
Light				
Light Objectives	LIGHT-O1	Support	Waka Kotahi supports the objective as it seeks to ensure outdoor lighting allows activities to occur beyond daylight hours and provides safety and security for activities, while protecting views of the night sky and managing light spill to maintain amenity values and the safe operation of the transport network.	Retain as notified.
Light Policies	LIGHT-P1	Support in part	The policy is generally supported as it seeks to manage the location, design and operation of outdoor lighting to ensure it does not distract or interfere with traffic and is compatible with the zone in which any light spill or glare is received. An amendment is sought to change reference to traffic to the safety of all transport users. It is also sought that the policy reference 'obtrusive light' rather than light spill or glare in accordance with AS/NZS4282:2019.	Amend policy to as follows: <i>Manage the location, design and operation of lighting to ensure:</i> <i>1. it does not distract or interfere with traffic the safety of all transport network users; and</i>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought		
				2. <i>it is compatible with the zone in which any light spill or glare obtrusive light is received.</i>		
	LIGHT-P2	Support in part	The proposed policy is generally support by Waka Kotahi, however an amendment is sought to provide clarification that upward light can be reflected off surfaces which cannot be controlled by the technical attributes of the artificial lighting. Other light can be obtrusive to viewing the night sky and transport infrastructure users such as glare, luminous intensity and average luminance of illuminated surfaces.	Amendment sought: <i>Require outdoor lighting to minimise, as far as practicable, the potential for upward light spill waste light while also limiting and restricting spill light and other obtrusive light that would be adversely affect the ability to view the night sky.</i>		
Light Rules	LIGHT-R1	Support in part	Waka Kotahi seeks an amendment to the rule to refer to ‘artificial outdoor lighting’ to ensure the rule refers to all forms of powering outdoor lighting such as solar and wind generation rather than only mains powered lighting.	Amendment sought to: Artificial outdoor lighting allows activities to occur beyond daylight hours and provides safety and security for activities, while...		
	LIGHT-R4	Support in part	Waka Kotahi seeks the inclusion of a new role to protect all transport infrastructure users to ensure appropriate lighting is provided to land transport infrastructure and public areas. There are currently no provisions for emergency responses, street lighting or other temporary uses, so further clarification is sought for lighting associated with these activities and how this will be managed through LIGHT-R1.	Seek inclusion of new rule LIGHT-R4 for additional rules to provide for lighting of land transport infrastructure and public areas. <table border="1" data-bbox="1599 1086 2078 1345"> <tr> <td>LIGHT-R4</td> <td><i>Land Transport Infrastructure and Public Area artificial outdoor lighting</i></td> <td></td> </tr> </table>	LIGHT-R4	<i>Land Transport Infrastructure and Public Area artificial outdoor lighting</i>
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Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought	
					<p>Activity status; PER</p> <p>Where: Artificial outdoor lighting for land transport infrastructure and public pedestrian or cycle use.</p> <p>Matters of discretion are restricted to: LIGHT-MD1.</p>
Light Standards	LIGHT-S1	Support in part	<p>An amendment is sought to the rule by Waka Kotahi to enable lighting for transport infrastructure use as follows:</p> <ol style="list-style-type: none"> All fixed exterior lighting shall be directed away from any adjacent roads, residential properties and lakes, unless the intended use of the lighting is for the specific purpose of transport infrastructure use. 	<p>Amendment sought as follows:</p> <ol style="list-style-type: none"> <i>All fixed exterior lighting shall be directed away from any adjacent roads, residential properties and lakes, unless the intended use of the lighting is for the specific purpose of transport infrastructure use.</i> 	
	LIGHT-S2	Support in part	<p>Waka Kotahi is generally supportive of the standard but rewording of the provision is sought to provide clarity relating to the direction of artificial outdoor lighting.</p>	<p>Amend the provision as follows:</p> <ol style="list-style-type: none"> All outdoor lighting shall be shielded from above in such a manner that the edge of the shield shall be below the whole of the light source, so that all the light shines below the horizontal. A shield is attached to the luminaire is only required if <u>all</u> 	

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
				<i>luminous flux is <u>not</u> directed below the horizontal when the luminaire is mounted in its normal operation position.</i>
	LIGHT-S3	Oppose	<p>Waka Kotahi is not supportive of a correlated colour temperature of outdoor lighting of 2500K across the entire Mackenzie District. It is acknowledged that a portion of the District recognised as an International Dark Sky Reserve, however, for safety reasons it is sought that the standard is amended to require 3000K in the Mackenzie District, except for within the International Dark Sky Reserve where outdoor lighting shall not exceed a correlated colour temperature of 2200K.</p> <p>Waka Kotahi also seeks the inclusion of geospatial overlay in the District Planning Maps (ePlan) to define the boundaries of the Dark Sky Reserve.</p>	<p>Amendment sought to provide for the following changes:</p> <ol style="list-style-type: none"> <i>The correlated colour temperature of outdoor lighting shall not exceed 2500K 3000K, except for:</i> <i>Within the area identified as an International Dark Sky Reserve (identified in the District Planning Maps), the correlated colour temperature of outdoor lighting shall no exceed 2200K.</i>
	LIGHT-S5	Support in part	<p>The standard is generally supported, however amendments are sought to provide clarity on the standard relating to horizontal and vertical illuminance. The amendment is sought to remove 'measured' as there are several variables that cannot be controlled and this can influence outdoor lighting measurements e.g. reflected light, direct light from other sources, such as the moon and sky, build-up of dirt and bugs etc.</p> <p>An amendment is also sought to address the wider transport network and public spaces beyond just roads.</p>	<p>The amendments sought are as follows:</p> <ol style="list-style-type: none"> <i>The maximum level of light spill from outdoor lighting shall not exceed the horizontal or vertical illuminance levels measured on any adjoining site in the receiving zone set out in LIGHT – TABLE 1, excluding roads. Transport infrastructure and public access areas.</i>