

Notice of Further Submission on Proposed Plan Change 23 to the Mackenzie District Plan

Resource Management Act – Form 6

Name of submitter:  Canterbury Regional Council (Environment Canterbury)

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Declaration: We made a submission on Proposed Plan Change23 to the Mackenzie District Plan – our submitter ID number is: **45**, and we are a local authority for the relevant area.

Hearing option: We **do** wish to be heard in support of our submission and we would consider presenting a joint case with others who have made a similar submission.

Environment Canterbury is representing a relevant aspect of the public interest, and is a person who has an interest in the proposal greater than the general public, as the Mackenzie District is part of its region covered by its regional policy statement, and it made a submission on PC23.

Environment Canterbury would like to comment on the submissions of:

Submitter and submitter ID	Address	Submission points
Department of Conservation: Submitter ID 7	Private Bag 4715 Christchurch Mail Centre Christchurch 8140 Email: aching@doc.govt.nz	7.05 7.09
Helios Energy Limited: Submitter ID 8	Email: sbrooks@heliosenergy.co.nz	8.04
NZ Transport Agency Waka Kotahi: Submitter ID 15	PO Box 1479 Christchurch 8011 Email: nick.reuther@nzta.govt.nz	15.04 15.05 15.06 15.07 15.08 15.10 15.13 15.14
PF Olsen: Submitter ID 24	396 Childers Road	24.05

	Gisborne 4010 Email: monique.bedim@pfolsen.com	24.08
NZ Pork: Submitter ID 26	PO Box 20176 Christchurch 8543 Email: Hannah.ritchie@pork.co.nz	26.01
Port Blakely: Submitter ID 29	PO Box 18 Christchurch Email: shona.walter@saunder.co.nz	29.01
Genesis Energy Limited: Submitter ID 40	PO Box 90477 Victoria Street West Auckland 1142 Email: alice.barnett@genesisenergy.co.nz	40.02
Meridian Energy Limited: Submitter ID 44	PO Box 2146 Christchurch 8140 Email: andrew.feierabend@meridianenergy.co.nz	44.03
Grampians Station Limited: Submitter ID 52	PO Box 244 Timaru 7940 Email: nicola@gressons.co.nz	52.01 52.13

Please find the details of our further submission included in the attached table below.

Yours faithfully



Jeff Smith

Team Leader Planning

This further submission is in relation to the submission of:	The submission point we support or oppose is:	The reasons for our support or opposition are:	Our position on this submission point is:	Support / Oppose relief sought
	7.05	Environment Canterbury supports the addition of <i>habitat or ecosystem</i> to NATC-S1, as this gives effect to CRPS Policy 10.3.1.	Accept the relief sought by the Director General of Conservation.	Support
	7.09	Environment Canterbury agrees that <i>or significant habitat of indigenous fauna</i> should be added to NFL-R6 and considers that this would give effect to CRPS Objective 9.2.1	Accept the relief sought by the Director General of Conservation.	Support
Helios Energy Limited Attention: Sarah Brooks	8.04	Environment Canterbury agrees that the definition of <i>Highly productive land</i> should be amended to better give effect to the NPS-HPL	Accept the relief sought by Helios Energy Limited	Support
New Zealand Transport Agency Attention: Nick Reuther	15.04	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of setbacks from wetlands, lakes and rivers. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Setbacks from waterbodies are an appropriate way to manage those effects.	Partially accept the relief sought by NZTA, but amend by inserting <i>the continuation of existing before regionally significant infrastructure</i>	Support in Part
	15.05	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of setbacks from wetlands, lakes and rivers. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Setbacks from waterbodies are an appropriate way to manage those effects.	Partially accept the relief sought by NZTA, but amend by inserting <i>existing before regionally significant infrastructure</i>	Support in Part
	15.06	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of setbacks from wetlands, lakes and rivers. CRPS Policy 5.3.9	Partially accept the relief sought by NZTA, but amend by inserting	Support in Part

		provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Setbacks from waterbodies are an appropriate way to manage those effects.	<i>existing before regionally significant infrastructure</i>	
	15.07	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of setbacks from wetlands, lakes and rivers. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Setbacks from waterbodies are an appropriate way to manage those effects.	Partially accept the relief sought by NZTA, but amend by inserting <i>existing before regionally significant infrastructure</i>	Support in Part
	15.08	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of setbacks from wetlands, lakes and rivers. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Setbacks from waterbodies are an appropriate way to manage those effects.	Partially accept the relief sought by NZTA, but amend by inserting <i>existing before regionally significant infrastructure</i>	Support in Part
	15.10	Environment Canterbury does not support specific policy provision for Regionally Significant Infrastructure in terms of the need to locate within Outstanding Natural Features and Landscapes. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Restrictions on the location of new regionally significant infrastructure are appropriate.	Reject the relief sought by NZTA	Oppose
	15.13	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of the need to locate	Partially accept the relief sought by NZTA, but amend	Support in Part

		within Outstanding Natural Features and Landscapes. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Restrictions on the location of new regionally significant infrastructure are appropriate.	by inserting <i>existing before regionally significant infrastructure</i>	
	15.14	Environment Canterbury partially supports the exemption for Regionally Significant Infrastructure in terms of the need to locate within Outstanding Natural Features and Landscapes. CRPS Policy 5.3.9 provides for the continuation of existing regionally significant infrastructure. The expansion of existing infrastructure or the development of new infrastructure requires that adverse effects on the environment are managed. Restrictions on the location of new regionally significant infrastructure are appropriate.	Partially accept the relief sought by NZTA, but amend by inserting <i>existing before regionally significant infrastructure</i>	Support in Part
PF Olsen Attention: Monique Bedim	24.05	Environment Canterbury agrees that the definition of <i>Harvest of Closed Canopy Wilding Conifers</i> should be amended to include the words <i>wilding conifer</i> after <i>tree</i> to narrow the scope of the provision.	Accept the relief sought by PF Olsen	Support
	24.08	Environment Canterbury does not agree that the definition of <i>Wilding Conifer Species</i> should be removed from the District Plan. Environment Canterbury consider that this definition, and the proposed provisions that control their planting and removal, give effect to CRPS Policy 5.3.13.	Reject the relief sought by PF Olsen	Oppose
NZ Pork Attention: Hannah Ritchie	26.01	Environment Canterbury agrees that the definition of <i>Highly productive land</i> should be amended to better give effect to the NPS-HPL	Accept the relief sought by New Zealand Pork	Support
Port Blakely Attention: Shona Walter	29.01	Environment Canterbury does not agree that Douglas Fir and European Larch should be removed from the definition of <i>Wilding conifer species</i> . While these species are not listed as Pests under the Regional Pest Management Plan (RPMP), they are listed as pest agents. Control of Douglas Fir and	Reject the relief sought by Port Blakely	Oppose

		European Larch along with the pest species will help to give effect to CRPS Policy 5.3.13.		
Genesis Energy Limited Attention: Alice Barnett	40.02	Environment Canterbury agrees <i>energy storage</i> should be included in the definition of <i>Infrastructure</i> . Environment Canterbury considers that this amendment will better give effect to CRPS Policy 16.3.3.	Accept the relief sought by Genesis Energy Limited	Support
Meridian Energy Limited Attention: Andrew Feierabend	44.03	Environment Canterbury agrees <i>energy storage</i> should be included in the definition of <i>Infrastructure</i> . Environment Canterbury considers that this amendment will better give effect to CRPS Policy 16.3.3.	Accept the relief sought by Meridian Energy Limited	Support
Grampians Station Limited Attention: Nicola Hornsey	52.01	Environment Canterbury does not support the extension of the <i>land rehabilitation</i> definition to apply to removal of wilding conifers that are not closed canopy. This could lead to large areas of topdressing and oversowing with a consequential loss of indigenous biodiversity. This would be in conflict with CRPS Objective 9.2.1.	Reject the relief sought by Grampians Station Limited.	Oppose
	52.13	Environment Canterbury does not support the extension of the policy to apply to removal of wilding conifers that are not closed canopy. This could lead to large areas of topdressing and oversowing with a consequential loss of indigenous biodiversity. This would be in conflict with CRPS Objective 9.2.1.	Reject the relief sought by Grampians Station Limited	Oppose