

Summary of Submissions by Submitter – Notified 16 February 2024
Plan Change 24 to the Mackenzie District Plan - Sites and Areas of Significance to Māori

#### About this summary of submissions

The submissions received on each plan change are summarised by ‘submitter’ and by ‘provision’

All submissions have a unique number e.g. ‘PC24.01’ is Submission 1 to Plan Change 24, and each submission point within a submission has a unique point number e.g. ‘1.01’, is submission point 1 of submission 1

Where a submitter has requested additions, these are shown in red underlined text, with deletions shown in ~~red strikethrough text~~

As this is a summary only, submissions should be referred to in full

The names of Acts, Regulations, Policies, Plans and Plan Changes have been abbreviated for brevity

Some submitters have included specific requests for changes in accordance with plans provided in their submissions – where these plans are referred to in the summary, they can also be found in [Appendix 1](#) at the end of the summary

Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Director-General of Conservation	PC24.01	1.01	SASM	Entire Plan Change		Support	Support the overall approach of providing for Sites and Areas of Significance to Māori as giving effect to the relevant higher order documents. Provisions not specifically addressed are supported for the reasons given in the S32 Report.	Retain as notified.
Director-General of Conservation	PC24.01	1.02	SASM	Objective, Policy and Rule for Mahika kai	SASM-O4, SASM-P3 and SASM-R1	Support	The proposed approach will appropriately enable mana whenua to practice mahika kai activities, while also providing environmental protection through the application of tikaka.	Retain as notified.
Ian Morrison	PC24.02	2.01	Mapping	Overlays	SASM Overlays	Oppose in Part	The ancient trail takes an unnecessary diversion from the Tengawai river and passes through a deer pen and through deer yards.	Re-route the ancient trail to the riverbed as it is elsewhere.
Ian Morrison	PC24.02	2.02	Mapping	Overlays	SASM Overlays	Oppose in Part	The rock art setback at 300 metres is excessive and effects too much valuable farmland that will never be irrigated.	Decrease the rock art setback to 50m.
Ian Morrison	PC24.02	2.03	Mapping	Overlays	SASM Overlays	Oppose in Part	An area of approximately 250 hectares has been mapped with no real evidence of being any more significant than all the South Island, an area of 200ha in the Southwest Corner has also been identified with no reason for it.	Remove the large 250ha site where it crosses my boundary onto P103 Run 306 Silver Hill and decrease the southwest site area.
Nova Energy Limited	PC24.03	3.01	SASM	Entire Plan Change		Support	Supports the insertion of a new Sites of Significance to Māori Chapter so far as mana whenua support its inclusion.	Retain as notified.
Nova Energy Limited	PC24.03	3.02	Interpretation	Definitions and Glossary Terms	All	Support	Supports the insertion, amendment and deletion of definitions and glossary terms as proposed, so far as they are supported by mana whenua.	Retain additions, amendments and deletions as proposed.
Nova Energy Limited	PC24.03	3.03	Mapping	Overlays	SASM Overlays	Support	Supports the amendments to the planning map as proposed so far as they are supported by mana whenua.	Retain as notified.
Transpower New Zealand Limited	PC24.04	4.01	SASM	Introduction		Oppose	Opposes the Introduction to the extent that the direction given could be understood to contradict the unambiguous direction in the Infrastructure Chapter. The Infrastructure Chapter directs (by omission) that the SASM provisions do not apply, and instead infrastructure located in SASM is addressed through the INF provisions (and the definition of sensitive area). Conversely, the SASM Introduction implies that SASM provisions might apply to an activity requiring resource consent under the INF rules.	Amend the Introduction as follows: "This chapter is not the only chapter in the District Plan <del>that which</del> manages activities that are located within SASM and should be read alongside other sections of the District Plan which also consider the effects of SASM. <u>In the case of infrastructure, all provisions that relate to infrastructure are contained in the Infrastructure Chapter (unless explicitly stated otherwise) and the SASM provisions do not apply.</u> In particular, it should be noted that there are rules in other chapters, including the Natural Character, Natural Features and Landscapes, Public Access and Earthworks chapters which manage activities that occur in SASM...."
New Zealand Transport Agency, Waka Kotahi	PC24.05	5.01	SASM	Objectives	SASM-O3	Support in Part	While the importance of SASM is recognised and their protection from inappropriate subdivision, use and development is supported, clarification is sought over what is meant with "inappropriate" to ensure that NZTA can fulfil its statutory functions.	Seeks clarification from Mackenzie District Council on how inappropriate development is defined.
New Zealand Transport	PC24.05	5.02	SASM	Policies	SASM-P2	Support		Retain as notified.

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Agency, Waka Kotahi								
New Zealand Transport Agency, Waka Kotahi	PC24.05	5.03	SASM	Policies	SASM-P4	Support		Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC24.05	5.04	SASM	Policies	SASM-P6	Support	Policy is generally supported.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC24.05	5.05	SASM	Rules	SASM-R3	Support	Rule EW-R1 provides a permitted activity pathway for repair and maintenance activities, including roads and associated infrastructure. The approach taken is supported under SASM-R3 that a permitted activity status can be retained if earthworks are already provided for under Rule EW-R1. The activity status for larger scale earthworks within a Silent File Area or a Māori Rock Art Protection Area is also supported.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC24.05	5.06	SASM	Rules	SASM-R6	Oppose	Infrastructure should be excluded. NZTA needs the provisioning of aggregate and materials for roading, stockpiling etc. NC activity status would impact on effective and efficient operation and maintenance of the network, especially when it comes to repairs and maintenance that requires a quick and efficient response. Climate change may impact requirements to maintain roads in future. Quarrying associated with the operation and maintenance of state highway networks should be excluded from this rule.	Quarrying associated with the operation and maintenance of state highway networks are excluded from SASM-R6.
New Zealand Transport Agency, Waka Kotahi	PC24.05	5.07	SASM	Matters of Discretion	SASM-MD1	Support in Part	Seeks to ensure the functional and operational needs of infrastructure are recognized and provided for under the matters of discretion by incorporating a new specific matter of discretion (i). Seeks clarification on what 'non-reticulated servicing' under matter of discretion (g) means in this context. It is also noted that there is no definition of the term 'service'.	Amend SASM-MD1 to include an additional matter of discretion: <u>i. In respect to infrastructure, the extent to which the proposed infrastructure or works have a functional and/or operational need for its location.</u> Seeks clarification from Mackenzie District Council regarding how 'non-reticulated servicing' is defined.
Milward Finlay Lobb Limited	PC24.06	6.01	Mapping	Overlays	SASM Overlays	Oppose	As a consultant we have numerous different people asking our advice on property and we rely on the information available on the E-plan to do this. Having SASM areas with no unique identification brings ambiguity into the plan. It is also noted that other E-plans (namely Timaru District Council) identify these areas and it is a much more effective tool.	Each SASM to be identified on the E-plan by its unique identification as listed in the Schedule.
PF Olsen	PC24.07	7.01	SASM	Policies	SASM-P6	Oppose in Part	There is no mention of other primary activity to be controlled, such as farming, near limestone outcrops, Māori rock art, and silent file areas to avoid damage to the integrity of these SASM.	Amend the policy to include primary production activities on sub-policy 3.
PF Olsen	PC24.07	7.02	SASM	Rules	SASM-R8	Oppose	There is a clear disproportional rule against commercial forestry tuning this activity as non-complying. While regulation 6 of NES-CF permits the stringency, the District is required to assess whether the rule is necessary. The S32 Report is vague in this regard stating limestone outcrops were not considered outstanding natural features by the district plan therefore there is no legal course for the rule.	Delete the provision.
Te Rūnanga o Ngāi Tahu	PC24.08	8.01	Interpretation	Definitions and Glossary Terms	Ngā Rūnaka	Support in Part	While Te Rūnanga o Ngāi Tahu (Te Rūnanga) in carrying out its duties to protect the settlement on behalf of all Kāi Tahu Whānui works with Ngā Rūnaka the way the plan rules are currently drafted could impact this responsibility.	Amend Plan Ngā Rūnaka definition as follows:  Ngā Rūnaka:

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							<p>A number of rules and discretions in the SASM chapter (which has links to other chapter rules) refers to Ngā Rūnanga only and could prevent Te Rūnanga from using or being approached on matters relating to settlement within these rules. For example, Te Rūnanga manages the Settlement Nohoaka entitlements across the Takiwā. However, rule SASM R2 only refers to Ngā Rūnanga. To avoid confusion within the wider community about when Te Rūnanga would act on behalf of or with Ngā Rūnanga, Te Rūnanga needs to be referenced alongside Ngā Rūnanga. However, it is considered that rather than changing the plan rules to include the Te Rūnanga a change to the Rūnaka definition is considered a cleaner option.</p> <p>The plan defines both Mana whenua (within the glossary) and Ngā Rūnaka. Furthermore, the Glossary also defines Ngā Rūnaka as: "Multiple rūnaka". This results in two definitions for Ngā Rūnaka within the plan which will create confusion.</p>	<p>i. means Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki as a collective and who hold Mana whenua status within Te Manahuna / Mackenzie District; and</p> <p>ii. Means Te Rūnanga o Ngāi Tahu for matters associated or related by any means to any matter in the Ngāi Tahu Deed of Settlement or Ngāi Tahu Claims Settlement Act 1998.</p> <p>Amend Ngā Rūnaka in the definitions or the glossary and replace with the wording above including the amendment sought so there is only one definition within the plan.</p>
Te Rūnanga o Ngāi Tahu	PC24.08	8.02	Interpretation	Definitions and Glossary Terms	All other definitions and glossary terms	Support	The remaining definitions relating to this chapter are appropriate.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.03	SASM	Introduction	Entire Introduction	Support	<p>This section recognizes Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki (Ngā Rūnaka) as Mana whenua of Te Manahuna/Mackenzie District and introduces the types of SASM's and mātauraka māori principles, and tools.</p> <p>It is important Ngā Rūnaka are able to exercise tino rangatirataka and kaitiakitaka over their ancestral lands, sites and areas of significance, water, wāhi tapu and other taoka, whenua, moana and wai.</p> <p>The section also sets out how this chapter should be read with other parts of the Plan.</p>	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.04	SASM	Objectives	SASM-O1	Support	It is important that Kāi Tahu rakatirataka is recognised and they are able to exercise kaitiakitaka over their ancestral lands, sites and areas of significance, water, wāhi tapu and other taoka.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.05	SASM	Objectives	SASM-O2	Support	As per section 6(e) it is important that the relationship of Mana whenua with their ancestral lands, sites and areas of significance, water, wāhi tapu and other taoka is maintained.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.06	SASM	Objectives	SASM-O3	Support	It is important that SASM's are protected against inappropriate use and development.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.07	SASM	Objectives	SASM-O4	Support	It is important to Te Rūnanga that Kāi Tahu Whānui maintain access to mahika kai and nohoaka in accord with the Ngāi Tahu Claims Settlement Act 1998. The principles of mahika kai and nohoaka are of great value to Kāi Tahu Whānui because of their historical and contemporary connection to the whenua, moana and wai. The contemporary and ongoing connections and aspirations of Kāi Tahu to exercise tino rangatirataka and kaitiakitaka in the te ao toroa, (the natural environment) are guaranteed under Te Tiriti o Waitangi and Ngāi Tahu Claims Settlement Act 1998.	Retain as notified.

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Te Rūnanga o Ngāi Tahu	PC24.08	8.08	SASM	Policies	SASM-P1 to SASM-P7	Support	It is important that SASM's and the historical and contemporary connection to these sites are protected and enhanced for Kāi Tahu. These policies enable Kāi Tahu Whānui to maintain and enhance not only their historical connection to the whenua, moana and wai but also their contemporary and ongoing connections and relationships.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.09	SASM	Rules	SASM-R1	Support in Part	The rule seeks to provide Mana whenua with rangatirataka over their whenua and enable them to undertake Mahika kai activities. However, the rule as currently written only applies to SASM - SCHED1. Te Rūnanga o Ngāi Tahu and Ngā Rūnaka may also undertake activities covered by this rule on the Nohoaka Sites listed in SASM-SCHED4.	Amend the rule as follows: Include SASM-SCHED4. Retain the remainder of the rule as notified provided the amendment sought to the definition of Ngā Rūnaka occurs. If the change to Ngā Rūnaka is not agreed, then Te Rūnanga o Ngāi Tahu needs to be included in this rule. For the reasons outlined within the definition's discussion.
Te Rūnanga o Ngāi Tahu	PC24.08	8.10	SASM	Rules	SASM-R2	Support	The rule enables Kāi Tahu to undertake traditional practices in traditional places. Without this rule and the amendment sort to the definition for Ngā Rūnaka, Te Rūnanga would not be able to manage the permit system it has for the nohoaka entitlements (provided as part of settlement) it manages on behalf of Kāi Tahu Whānui	Retain as notified provided the amendment sought to the definition of Ngā Rūnaka occurs. If the change to Ngā Rūnaka is not agreed, then Te Rūnanga o Ngāi Tahu needs to be included in this rule. For the reasons outlined within the definition's discussion.
Te Rūnanga o Ngāi Tahu	PC24.08	8.11	SASM	Rules	SASM-R3	Support	The rule applies protection of values and connections associated within these areas.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.12	SASM	Rules	SASM-R4	Support	The rule applies protection of values and connections associated within these areas.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.13	SASM	Rules	SASM-R5	Support	The rule applies protection of values and connections associated within these areas.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.14	SASM	Rules	SASM-R6	Support	The rule and status require consideration of the effects of these activities on Ngā Rūnaka values within a SASM. It is appropriate that these activities are considered on a case-by-case basis through the consenting process and given a higher consideration given the impact they can have on the special values within these areas.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.15	SASM	Rules	SASM-R7	Support	Te Rūnanga seek to ensure Māori rock art is protected in perpetuity. And, as such, support the protection of Māori rock art in Situ. However, acknowledges that there may be some rare situations when that protection may require a consenting pathway of this type.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.16	SASM	Rules	SASM-R8	Support	Te Rūnanga seek to ensure Māori rock art is protected in perpetuity. And, as such, support the protection of Māori rock art in Situ and the consideration of the effects of commercial forestry on the values within these areas.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC24.08	8.17	SASM	Note: Non-Notification of Applications		Support in Part	This is appropriate given the specificity of the effects of these activities within the rules, with a Restricted Discretionary status, are limited to effects that would impact Kāi Tahu values and only Kāi Tahu can speak to the effect on their values. However, for the general plan users it may not be clear that both Ngā Rūnaka and the Ngāi Tahu Māori Rock Art Trust may need to be limited notified for activities that trigger the rules.	Amend in part provided changes relating to the Ngā Rūnaka occur as per other submission points are provided for as follows: Any application for resource consent for restricted discretionary activities will not be publicly notified and, for the purpose of limited notification, assessment of affected person shall be limited to effects on Mana whenua. (Note: for limited notification purposes this will include Ngā Rūnaka and the Ngāi Tahu Māori Rock Art Trust)
Te Rūnanga o Ngāi Tahu	PC24.08	8.18	SASM	Matters of Discretion	SASM-MD1	Support	It is important that all the effects associated with an activity on the values associated with the listed SASM's are able to be considered during the consenting process.	Retain as notified provided the amendment sought to the definition of Ngā Rūnaka occurs. If the change to the definition is not included then Te Rūnanga o Ngāi Tahu needs to be included in this discretion.

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South Canterbury Province Federated Farmers of New Zealand	PC24.09	9.01	SASM	Objectives	SASM-O1 to SASM-O4	Support	Overall, supportive of this chapter, it clearly explains SASMs and their importance to runaka. We recognise the importance of having local Māori history acknowledged, identified and protected for future generations to enjoy. Endorse the encouragement of ongoing engagement between landowners and iwi. This key relationship will ensure appropriate and adequate measures are undertaken only on the areas that need protection.	Retain as notified.
South Canterbury Province Federated Farmers of New Zealand	PC24.09	9.02	SASM	Policies	SASM-P1 to SASM-P7	Support	Refer to summary of point 9.01.	Retain as notified.
South Canterbury Province Federated Farmers of New Zealand	PC24.09	9.03	SASM	Rules	SASM-R1 to SASM-R8	Support	Refer to summary of point 9.01.	Retain as notified.
Port Blakely Limited	PC24.10	10.01	SASM	Objectives	SASM-O3	Support in Part/Oppose in Part	Recognises the approach behind the drafting of the SASM, by using other provisions in the Plan to appropriately consider the protection of values associated with the SASM where an activity requires a resource consent application. However, the NES-CF was developed to comprehensively manage the effects on the environment from commercial forestry and District Council should take care to carefully balance the need to recognise and protect the historical and cultural interests of Māori and the need to avoid unnecessary duplication of rules where those effects are already regulated by higher order RMA documents.	No specific relief requested.
Port Blakely Limited	PC24.10	10.02	SASM	Policies	SASM-P6	Support in Part/Oppose in Part	<p>The NES-CF allows District Plans to be more stringent in situations set out in Reg 6. This regulation allows for District Plans to impose stricter rules that give effect to the National Policy Statement for Freshwater Management and rules that regulate afforestation.</p> <p>The areas identified as SASM could come inside the jurisdiction of Reg 6, if their protection is necessary for the Mana o te Wai, a central concept underpinning the NPS-FM. These include areas which protect mahinga kai and cultural traditions connected to water ways. In addition, under the concept of ki uta ki tai, mountains, river catchment zones and their tributaries also come under the protection of the NPS-FM.</p> <p>There is doubt as to whether the rules are justified. There is no discussion in the Section 32 Report of circumstances in the Mackenzie District which justifies stricter requirements needed to manage the effects on SASMs from commercial forestry.</p>	No specific relief requested.
Ministry of Education	PC24.11	11.01	SASM	Objectives	SASM-O3	Support in Part	Acknowledges that subdivision, use and development within SASM should generally be discouraged for educational facilities, except where there is an operational need. The direction to using the terms 'inappropriate' and 'avoid' impacts on subdivision, use and development does not align with the language of the objective 'allowing' activities	Amend SASM-O1 as follows: <del>Inappropriate s</del> Subdivision, use and development within SASM is <del>restricted avoided</del> .



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							where there is an operational need. The Ministry seeks an amendment to the wording of the policy to restrict adverse effects as opposed to avoidance.	
Ministry of Education	PC24.11	11.02	SASM	Policies	SASM-P6	Support	Acknowledges that educational facilities, will manage adverse effects of activities within SASM to ensure that the values of the identified schedules are not compromised.	Retain as notified.
Genesis Energy Limited	PC24.12	12.01	Interpretation	Definitions	Earthworks	Support	The definition of earthworks is supported	Retain as notified.
Genesis Energy Limited	PC24.12	12.02	Interpretation	Definitions	Functional Need	Support	The definition of functional need is supported	Retain as notified.
Genesis Energy Limited	PC24.12	12.03	Interpretation	Definitions	Infrastructure	Oppose	Infrastructure is included in the list of definitions associated with PC24, however is not marked as being subject to a plan change. Infrastructure is defined as having the same meaning as in section 2 of the RMA which includes "facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity". While Genesis consider it is appropriate that the RMA definition of infrastructure forms the basis of the definition, the definition should be extended to include energy storage systems, recognising the role that such systems are likely to play in future electricity systems.	Amend the definition of infrastructure as follows: Has the same meaning as in section 2 of the RMA <b>with an added reference to energy storage</b> , (as set out below) Means - ... (d) facilities for the generation of electricity, <b>energy storage</b> , lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person- ... Alternatively, if the definition of Infrastructure is not amended, then all provisions in all of PC23, PC24, PC2S, PC26 and PC27 that refer to "Infrastructure" should be amended to refer to "Infrastructure <b>and energy storage facilities</b> ",
Genesis Energy Limited	PC24.12	12.04	Interpretation	Definitions	Operational need	Support	The definition of "Operational need" is currently limited to the residential, commercial and mixed use and general industrial zones and Plan Changes 23, 24, 25, 26 and 27 propose to extend the application of the term to those chapters introduced through plan changes 23, 24, 25, 26 and 27, where the terms are used in those chapters. On this basis, the definition of "operational need" is supported and should be applied throughout the Plan.	Retain as notified and apply throughout the Plan.
Genesis Energy Limited	PC24.12	12.05	SASM	Introduction	Introduction	Support in Part	<p>The introduction to the SASM chapter notes that other chapters within the plan manage activities that are located within SASM. In particular, the introduction notes that chapters including the "Natural Character, Natural Features and Landscapes, Public Access and Earthworks chapters which manage activities that occur in SASM, and where an activity is proposed within a SASM which requires resource consent under those chapters, the objectives, policies and matters of discretion in this chapter may also be relevant to consideration of that activity".</p> <p>The Renewable Electricity Generation Chapter does not identify the SASM chapter as applicable to the management of renewable electricity generation activities, however does identify "Historical Heritage". Historical Heritage is identified as a topic to be reviewed as part of the Stage Four District Plan reviews. It is unclear whether this historical heritage as referenced in the REG chapter includes SASM, and therefore</p>	<p>Amend the Introduction as follows:</p> <p>...</p> <p>This chapter is not the only chapter in the District Plan which manages activities that are located within SASM and should be read alongside other sections of the District Plan which also consider the effects on SASM. In particular, it should be noted that there are rules in other chapters, including the Natural Character, Natural Features and Landscapes, Public Access and Earthworks chapters which manage activities that occur in SASM, and where an activity is proposed within a SASM which requires resource consent under those chapters, the objectives, policies and matters of discretion in this chapter may also be relevant to consideration of that activity.</p> <p><b>The provisions of this chapter do not apply to renewable</b></p>

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							whether (with the exception of earthworks associated with the construction of new roads or access tracks) the SASM chapter does or does not apply to renewable electricity generation activities and this should be made clear in the introduction to this chapter.	<a href="#">electricity generation activities which are managed under the Renewable Electricity Generation Chapter.</a>
Opuha Water Limited	PC24.13	13.01	Mapping	Overlays	SASM Overlays		The overlay has not been accurately applied. In particular, the extent of the overlay does not accurately align with surface waterway boundaries. For example, the SASM overlay applying to the Opuha/Opuha River immediately downstream of the Opuha Dam, which is shown in the submission, does not follow the physical extent of that surface waterbody. This will create issues for the rule interpretation if not fixed.	Amend the SASM overlay for surface waterways to ensure the boundary of the SASM overlay more accurately reflects the location and extent of current surface waterbodies.
Opuha Water Limited	PC24.13	13.02	SASM	Policies	SASM-P3	Oppose in Part	<p>Concerned that mana whenua access cannot always be made available to such sites, including where access is sought to carry out customary activities. In particular, public health and safety reasons (and consequences for liability under health and safety legislation) may preclude access where infrastructure is co-located within SASMs.</p> <p>The Opuha Dam and associated infrastructure schemes are presently co-located in SASMs listed in SCHED-1 and potentially where customary activities are, or may be in the future, be carried out. The Proposed Timaru District Plan's objectives and policies for Public Access and Esplanade expressly acknowledge that public health and safety as a legitimate basis on which public assess can be avoided. This approach is not reflected in the public access provisions in PPC27.</p> <p>SASM-P3 should be amended to recognise the statutory health and safety obligations that infrastructure providers must comply with in the operation of infrastructure, particularly regionally significant infrastructure, which may preclude mana whenua access to SASMs.</p>	Amend SASM-P3 as follows: Enable mana whenua to undertake mahika kai within SASM in accordance with tikaka <a href="#">where appropriate.</a>
Opuha Water Limited	PC24.13	13.03	SASM	Policies	SASM-P4	Support	Considers the direction in SASM-P4 for existing access to SASM to be maintained and encouraging landowners to explore opportunities/methods to provide new access to SASM, where requested by mana whenua, is appropriate.	Retain as notified.
Opuha Water Limited	PC24.13	13.04	SASM	Policies	SASM-P6	Support	No reference to infrastructure activities in SASMs are addressed in SASM-P6, which OWL understands is because these activities are governed by the rules in the Infrastructure and Renewable Electricity Generation chapters. OWL supports this approach.	Retain the approach adopted by MDC in the district plan review process that infrastructure activities in SASMs are governed by the rules contained in the Infrastructure and Renewable Electricity Generation chapters (not the SASM chapter).
Opuha Water Limited	PC24.13	13.05	Mapping	Mapping and SASM-SCHED-1	Overlay and Table 2 - Waterbodies	Oppose	Questions the inclusion of the area comprising the Opuha Dam and associated downstream infrastructure (including the downstream weir retention pond) as being included in SASM26 - Opuha River/Opuha River (Wai taoka; Wahi taoka), as shown in the planning maps. OWL does not consider it appropriate or necessary for this highly modified part of the Lake Opuha/Opuha River system to be classified as SASM under the district plan in the absence of any explanation as to the reason for its inclusion.	Remove the SASM overlay from the area comprising the Opuha Dam and downstream infrastructure, including the downstream weir retention pond ( <a href="#">Refer to Appendix 1 to Summary of Submissions</a> ).
Meridian Energy Limited	PC24.14	14.01	Interpretation	Definitions	Earthworks	Support	Considers that the definition of "earthworks" adequately describes the activity.	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Meridian Energy Limited	PC24.14	14.02	Interpretation	Definitions	Functional Need	Support	Considers that the definition of "functional need" adequately describes the need.	Retain as notified.
Meridian Energy Limited	PC24.14	14.03	Interpretation	Definitions	Infrastructure	Oppose	<p>The term "infrastructure" is listed in PC24's definitions but is not marked as being affected by a plan change.</p> <p>The definition states that "infrastructure" has the same meaning as in section 2 of the Act. This includes "facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity. Although it is appropriate to adopt the definition of infrastructure from the Act as a base, however there is a significant gap in the definition with energy storage facilities not included in the list.</p> <p>Energy storage facilities are key to capturing electricity generated during periods when demand is less than supply (i.e. generation) and then supplying electricity when demand is greater than supply. This aids efficiency of energy use and helps to prevent outages. Given the national significance of renewable electricity sources and minimising the use of non-renewable electricity sources, such facilities should be specifically identified in the definition of "infrastructure".</p>	<p>Amend the first line and part (d) of the definition of "Infrastructure" as follows:</p> <p>Has the same meaning as in section 2 of the RMA, <u>with an added reference to energy storage facilities</u>, (as set out below):</p> <p>...</p> <p>(d) facilities for the generation of electricity, <u>energy storage facilities associated with the supply of renewable electricity</u>, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person.</p> <p>Alternatively, if the definition of "Infrastructure" is not amended, then all provisions in all of PC23, PC24, PC25, PC26 and PC27 that refer to "Infrastructure" should be amended to refer to <u>"infrastructure and energy storage facilities associated with the supply of renewable electricity."</u></p>
Meridian Energy Limited	PC24.14	14.04	Interpretation	Definitions	Operational Need	Support	The definition of "operational need" is coloured pink in PC24 meaning the term is currently limited to the residential, commercial and mixed use and general industrial zones and Plan Changes 23, 24, 25, 26 and 27 propose to extend the application of the term to those chapters introduced through Plan Changes 23, 24, 25, 26 and 27, where the terms are used in those chapters. On this basis, Meridian considers that the definition of "operational need" adequately describes the need and should be applied throughout the plan.	Retain as notified and apply throughout the Plan.
Meridian Energy Limited	PC24.14	14.05	SASM	Introduction	Introduction	Oppose in Part	Generally supports the SASM Introduction, however they consider that clarification should be provided to plan users that REG activities are managed under the REG chapter of the plan and are not subject to the provisions in the SASM chapter. This does not mean that the potential effects of renewable electricity generation activities on SASMs are not managed, but that such effects are managed through the provisions within the REG chapter.	<p>Amend the SASM Introduction by adding the following paragraph:</p> <p><u>Renewable electricity generation activities are not subject to the provisions in this chapter.</u></p>
Canterbury Regional Council	PC24.15	15.01	Interpretation	Definitions	Irrigation	Support in Part	This definition is sourced from the NES-FW, but the source has not been acknowledged.	Add note to definition as follows: <u>(National Environmental Standards for Freshwater Definition)</u>
Canterbury Regional Council	PC24.15	15.02	Interpretation	Definitions	Wetland	Support in Part	This definition is sourced from the National Planning Standards, but the source has not been acknowledged.	Add note to definition as follows: <u>(National Planning Standard Definition)</u>
Wolds Station Limited	PC24.17	17.01	Interpretation	Definitions	Irrigation		Maintains some areas of border dyke irrigation and is concerned that a "constructed system" may be interpreted to exclude existing border dyke irrigation.	<p>Amend definition of irrigation as follows:</p> <p>"Means the activity of applying water to land by means of a constructed system, <u>including lawfully established flood (border dyke) irrigation system(s)</u>, for the purpose of assisting production of vegetation or stock on that land."</p>



Summary of Submissions by Submitter – Notified 16 February 2024
Plan Change 24 to the Mackenzie District Plan - Sites and Areas of Significance to Māori

Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Wolds Station Limited	PC24.17	17.02	SASM	Objectives	SASM-O3		Respect that mana whenua are best placed to identify areas of significance and their values but considers that identification ought to be subject to a collaborative process which includes local runanga, any affected landowner, and the Council. For example, it may be necessary for site visits to be undertaken to confirm desktop values, or otherwise. The Wolds acknowledge that managing adverse effects on identified SASM is important but considers that the functional and operational need for some activities, as well as providing for renewal of existing and lawfully established activities (to acknowledge investment) to locate in SASM, cannot be avoided. Considers that these provisions should also contemplate existing uses of land subject to SASMs and activities.	Amend SASM-O3 to ensure there is not a blanket approach to avoiding all forms of land use and development within identified SASM where effects can be adequately remedied or mitigated or where land use is existing and lawfully established.
Wolds Station Limited	PC24.17	17.03	SASM	Policies	SASM-P1		Refer to summary of point 17.02.	Amend SASM-P1 to build in provision for a collaborative process for identifying areas of significance.
Wolds Station Limited	PC24.17	17.04	SASM	Policies	SASM-P6		Refer to summary of point 17.02.	Amend SASM-P6 as follows: <b>Enable land use activities that make efficient use of land and resources while managing</b> the adverse effects of activities within SASMs <b>so that the values associated with that SASM identified in SASM-SCHED1, SASM-SCHED2, SASM-SCHED3 and SASM-SCHED4</b> are not compromised, by...."  Further amend SASM-P6 to ensure there is not a blanket approach to avoiding all forms of land use and development within identified SASM where effects can be adequately remedied or mitigated or where land use is existing and lawfully established.
Wolds Station Limited	PC24.17	17.05	Mapping	Overlays	SASM Overlays		Considers that a ground-truthed review of the mapped and scheduled SASMs needs to be undertaken to confirm location, extent, and significance. SASM55, the Mary Range traverses the Wolds Station.	Delete SASM55 or in the alternative follow a collaborative identification process as detailed in this submission. Amend the SASM overlays and schedules to align with ground-truthed outcomes.
Grampians Station Limited	PC24.18	18.01	SASM	Policies	SASM-P4	Oppose in Part	Policy is supported however the responsibilities of landholders and managers under Health and Safety legislation needs to be recognised and specifically referenced.	Amend Policy to read as follows: Maintain existing access to SASM for manu whenua and encourage landowners to explore opportunities and methods to provide new access to SASM, where requested by mana whenua <b>in a way that ensures health and safety obligations to the public can be met.</b>
Grampians Station Limited	PC24.18	18.02	SASM	Rules	SASM-R1	Oppose in Part	The responsibilities of landholders and managers under Health and Safety legislation needs to be recognised and specifically referenced in this Rule.	Amend Rule to include the following: Activity Status: PER Where <b>health and safety obligations to the public can be met:</b> <b>1.The purpose...</b>
Grampians Station Limited	PC24.18	18.03	Mapping	Overlays	SASM Overlays	Oppose in Part	Grampians Range would like to better understand the reasons for the extent of the SAMS overlay that is on land farmed by Grampians Station Limited so that it can be confirmed that the mapping of the overlay is correct.	Boundaries of SASM Mapping Overlay as it relates to land farmed by Grampians Station Limited to be confirmed only once consultation with mana whenua has been undertaken.
New Zealand Defence Force*	PC24.19	19.01	SASM	Policies	SASM-P4	Neutral	PC 24 identifies a new SASM within NZDF's designation for the Tekapo Military Training Area as well as the adjacent waterbodies. It is unclear at the time of writing which references and schedules apply to these specific SASM. NZDF wishes to acknowledge the SASM within and adjacent to its landholding at the Tekapo Military Training Area and the	Retain or amend as required to address submission point.

Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
							intention of this provision but wishes to raise concerns that access will not be able to be provided to NZDF sites due to the operation of a working military site.	
Andrew Anderson*	PC24.20	20.01	Mapping	Overlays	SASM Overlays	Oppose in Part	The rock art setback of 300m is excessive and affects too much farm land.	The setback from rock art be reduced to between 50-100m.

\* Late submission

## Appendix 1

Opuha Water Limited, Submission PC24.13, Submission Point 13.05

