

**FURTHER SUBMISSION IN SUPPORT OR OPPOSITION TO SUBMISSIONS ON
PROPOSED PLAN CHANGE 20 TO THE MACKENZIE DISTRICT PLAN**

Clause 8 First Schedule, Resource Management Act 1991

TO: Planning Manager
Mackenzie District Council
PO Box 52
Proposed Plan Change 20 (Strategic Chapters) to Mackenzie District Plan
Main Street
FAIRLIE 7949

By email: districtplan@mackenzie.govt.nz

Name of further submitter:

1 Opuha Water Limited (**OWL**)

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Submission that this further submission relates to is:

2 This is a further submission in support or opposition to the primary submissions set out in **Annexure A** on proposed Plan Change 20 (Strategic Chapters) to the Mackenzie District Plan (**PC20**), which forms part of Stage 1 of the Mackenzie District Council's (**Council's**) review of the Operative Mackenzie District Plan (**District Plan**).

Status of further submitter:

3 OWL is a person who has an interest in PC20 that is greater than the interest the general public has as it owns and operates the Opuha Dam and related infrastructure supporting hydro electricity generation, irrigation and community supply schemes in the eastern part of the Mackenzie District.

4 The strategic importance of these schemes is recognised in the following regional planning documents:

4.1 The Canterbury Regional Policy Statement (**CRPS**) – the hydro-electric scheme is “regionally significant infrastructure” for the purpose of this document.

4.2 The Canterbury Land and Water Regional Plan (**CLWRP**) – the national benefits of the Opuha hydro-electric and irrigation and community supply schemes is recognised within Policy 4.51 and Rule 5.125C of this document, and OWL's status as a “principal water supplier” is also recognised and provided for through the CLWRP's policy and rule framework, including in Plan Change 7.

Parts of the primary submissions supported or opposed by OWL:

- 5 The parts of the primary submissions on PC20 that OWL supports and/or opposes are set out in **Annexure A** to this further submission, together with the reasons for the further submission and decisions sought by OWL.

Wish to be Heard:

- 6 OWL wishes to be heard in support of this submission.
- 7 OWL would be prepared to consider presenting a joint case with others making similar submissions at the hearing.



Opuha Water Limited

By its Solicitors and authorised Agents

Gresson Dorman & Co: Georgina Hamilton / Cory Shaw

Date: 3 October 2022

ANNEXURE A – REASONS FOR FURTHER SUBMISSIONS AND DECISIONS SOUGHT BY OPUHA WATER LIMITED

Submission Number	Submitter	Decision Requested by Submitter (Amendments <u>underlined</u> and deletions struck-out)	Support/Oppose	Reasons	Decision sought by Opuha Water Limited
5.	Royal Forest and Bird Protection Society of New Zealand	Retain Part One, Chapter: Definitions as notified.	Support	OWL supports the definitions chapter, but like the submitter, wishes to maintain an interest in any future updating of the decisions section to ensure consistency with Plan Change 18 (Indigenous Biodiversity) (PC18) to the Mackenzie District Plan (District Plan) or as a result of future plan changes forming part of the Mackenzie District Council’s district plan review programme.	Allow the submission point.
		Amend Part 2 Section: Strategic Directions, Introduction to: <i>For the purposes of preparing, changing, interpreting, and implementing the District Plan, all objectives and policies in other chapters of this District Plan are to be read and achieved in a manner consistent with the strategic objectives. There is no hierarchy between the stated objectives. No one Strategic Objective has primacy over another strategic objective and the Strategic Objectives should be read as a whole.</i> <u>For the purpose of plan implementation (including in the determination of resource consent application and notices of requirement):</u> a. <u>The strategic objectives in this chapter</u>	Support	OWL agrees with the submitter’s request for careful working on how the strategic objectives chapter is to be interpreted with regard to the rest of the District Plan. OWL considers the submitter’s proposed amendments are required to ensure that outcome is achieved.	Allow the submission point.

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		<p><u>may provide guidance on what the related objectives and policies in other chapters of the Plan are seeking to achieve in relation to the Strategic Issues;</u></p> <p>b. <u>The relevant objective and policies of the plan (including Strategic Objectives and Strategic Policies in this Chapter) are to be considered together and no fixed hierarchy exists between them.</u></p>			
		Retain Chapter: ATC – A Thriving Community, Introduction as notified	Support in part	OWL supports the submission point subject to the amendments sought in its own primary and supported in its further submissions, and for the reasons stated in those submissions.	Allow the submission to the extent that it is consistent with the decisions sought in OWL’s primary and further submissions on Chapter: ATC – A Thriving Community, Introduction as notified.
		Retain Strategic Objectives ATC-O1 – O5 as notified	Support in part	OWL supports the submission point subject to the amendments supported in its further submissions, and for the reasons stated in those submissions.	Allow the submissions to the extent that it is consistent with the decisions supported by OWL’s further submissions in relation to Strategic Objectives ATC-O1 – O5 as notified.
		Retain Strategic Objective MW-O1 -O2 as notified	Support in part	OWL supports the submission point subject to the amendments sought in its own primary submission and further submissions, and for the reasons stated in those submissions.	Allow the submissions to the extent that they are consistent with the decisions sought in OWL’s primary and further submissions on Strategic Objectives MW-O1 -O2 as notified.
		Amend wording to the introduction of Chapter: NE – Natural Environment, as well as the inclusion of an additional paragraph, after the second paragraph of the introduction, as follows:	Oppose in part	<p>OWL considers the amendments to the second paragraph in the Introduction sought by the submitter better reflect the intention of that paragraph.</p> <p>In terms of the proposed additional new</p>	<p>Allow submitter’s submission on the second paragraph of the introduction of Chapter: NE – Natural Environment.</p> <p>Disallow the submitters submission on the proposed new paragraph until the</p>

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		<p><i>The District contains many natural resources <u>some of which are of significant</u>. These <u>natural resources include: resources valued by mana whenua for mahika kai; the Aoraki Mackenzie International Dark Sky Reserve; those landscapes, and features that are considered outstanding and indigenous biodiversity that are is considered</u></i></p> <p>New paragraph:</p> <p><i><u>It is important to maintain indigenous biodiversity that may not of itself be significant. The Mackenzie's biodiversity in general contributes to the district's social and cultural well-being. A failure to protect or maintain indigenous biodiversity could adversely affect the community's environment, social, cultural and economic well-being.</u></i></p>		<p>paragraph, OWL considers any change or addition to the Introduction that relates to indigenous biodiversity should align with the outcome of the current appeals on PC18 (Indigenous Biodiversity). OWL notes that the objectives of Chapter 19 of the Independent Commissioners' "Decisions Version" of PC18 directs maintenance of indigenous biodiversity, including protection and/or enhancement of significant vegetation and habitats. OWL considers that it would be premature to update the Strategic Chapters in PC20 in relation to biodiversity matters until the PC18 appeals have been determined or resolved, so as to ensure appropriate alignment/consistency across the District Plan.</p>	<p>Environment Court appeals on PC18 have been resolved or determined, to ensure proper alignment/consistency with the final version of Chapter 19.</p>
		<p>Amend objective NE-O1 by separating it into two objectives:</p> <p><i>NE-O1 Natural Environment</i></p> <p><i>The values of the natural environment that make the District unique, contribute to its character, identity and wellbeing, and <u>or</u> have significant <u>or outstanding</u> intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i></p>	<p>Oppose in part</p>	<p>OWL considers the submitter's proposal to split proposed NE-O1, and minor adjustments to the wording of that objective is appropriate.</p> <p>In terms of the submitter's proposed new objective NE-O2, OWL largely supports the wording offered by the submitter. However, it considers any change or addition that relates to indigenous biodiversity – in this case, particularly clause 3 of proposed NE-O2 -</p>	<p>Disallow that part of submission addressing indigenous biodiversity matters (clause 3 of proposed NE-O2) until the Environment Court appeals on PC18 have been resolved or determined to enable proper alignment with the final version of Chapter 19. Otherwise allow the submission.</p>

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		<p>1. mahika kai resources; 2. night sky darkness; 3. outstanding natural features and outstanding natural landscapes are identified, and their values recognised and protected;</p> <p>Then add a New NE-O2 as follows:</p> <p><u>NE-O2</u></p> <p><u>Across the District:</u></p> <ol style="list-style-type: none"> 1. <u>Mahika kai resources are protected and enhanced.</u> 2. <u>Night sky darkness is protected and enhanced;</u> 3. <u>There is an overall net gain in the quality and quantity of indigenous ecosystems and habitats, and indigenous biodiversity across the district and significant indigenous vegetation and habitats are protected.</u> 4. <u>people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the western ranges, and within urban environments.</u> 5. <u>land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi</u> 		<p>should reflect the outcome of the current appeals on PC18. OWL notes that the objectives of Chapter 19 of the Independent Commissioners’ “Decisions Version” of PC18 directs maintenance of indigenous biodiversity, including protection and/or enhancement of significant vegetation and habitats (rather than a requirement for “overall net gain...” as proposed by the submitter). OWL considers that it would be premature to update the Strategic Chapters in PC20 in relation to biodiversity matters until the PC18 appeals have been determined or resolved, so as to ensure appropriate alignment/consistency across the District Plan.</p>	

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		<p><u>Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater; and</u></p> <p>6. <u>the mauri of ecosystems and indigenous biodiversity is safeguarded, and freshwater is managed in a way that gives effect to “Te Mana o te Wai.”</u></p>			
6.	Federated Farmers	The section 32 evaluation, when discussing Strategic Objective ATC-O2 Rural Area, has no reference to cultural well-being, only social and economic.	Support	OWL share’s the submitter’s view that cultural well-being should be addressed in Objective ATC-O2 Rural Area.	Allow the submission point.
		<p>Within Part One, Section: How the Plan Works, Chapter: Statutory Context, amend wording in the table summarising RMA provisions, section 31 to read:</p> <p><i>Sets out MDC’s functions under the RMA, which include achieving integrated management of the effects of the use, development, or protection of land and associated natural and physical resources; ensuring there is sufficient <u>land development capacity in respect for housing and business and activities, to meeting the demands of the district.;</u> controlling the effects of the use, development, or protection of land; controlling the emission of noise and the mitigation of the effects of noise; and controlling any actual or potential</i></p>	Support	OWL considers the amendments sought by the submitter are appropriate.	Allow the submission point.

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		<p><i>effects of activities in relation to the surface of water in rivers and lakes.</i></p> <p>Retain Strategic Objective ATC-02 as notified.</p>	Support	OWL supports the submission point subject to the amendments sought in its own primary and further submissions, and for the reasons stated in those submissions.	Allow the submission to the extent that it is consistent with the decisions sought in OWL's further submissions on Strategic Objective ATC-02 as notified.
7.	Genesis Energy	<p>Amend the paragraph four of the introduction to Chapter: ATC - A Thriving Community and add a fifth paragraph.</p> <p><i>There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, as well as development of new infrastructure is important to the well-being of the community of Mackenzie, Canterbury and nationally. This includes the contribution that <u>existing and new</u> renewable electricity generation and transmission assets located in the District make to the nation.</i></p> <p>To be followed by a fifth paragraph:</p> <p><u>Part of the nationally significant Waitaki</u></p>	Support	OWL share's the submitter's view that the contribution of both existing and new renewable electricity generation in the District should be reflected in the Introduction.	Allow the submission point.

Submission Number	Submitter	Decision Requested by Submitter (Amendments <u>underlined</u> and deletions struck out)	Support/Oppose	Reasons	Decision sought by Opuha Water Limited
		<u>Power Scheme (WPS) is located within the district. The WPS is the largest hydro-electric power scheme in New Zealand and significantly contributes to decarbonising New Zealand's economy, mitigating the potential effects of climate change and reducing the District's reliance on non-renewable energy sources.</u>			
		Retain Strategic Objective ATC-O3 as notified.	Support in part	OWL supports the submission point subject to the amendments supported in its further submissions, and for the reasons stated in those submissions.	Allow the submission point to the extent that it is consistent with the decisions supported by OWL's further submissions in relation to Strategic Objectives ATC-O3 as notified.
		<p>Replace Strategic Objective ATC-O4 with the following:</p> <p><u>ATC – O4 Renewable Energy</u> <u>The local, regional and national benefits of the District's renewable electricity generation and electricity transmission assets are recognised and their development, operation, maintenance and upgrade are provided for.</u></p> <p><u>Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u></p> <p>a. <u>are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u></p>	Support in part	<p>OWL considers that the submitter's proposed expansion of ATC-O4 is appropriate as it would provides greater clarity around how the significance of renewable electricity generation activities in the District are recognised.</p> <p>However, if ATC-O4 is to expressly recognise specific renewable electricity generation activities such as the Waitaki Power Scheme, OWL considers reference to the Opuha Scheme's hydroelectricity generation component should also be made.</p> <p>In this regard, OWL notes that in the Independent Commissioners' decision on PC18 it was accepted that the National Policy Statement for Renewable Energy (NPSRE) applies to</p>	Allow the submission point in part – if ATC-O4 is amended as requested by the submitter, reference to the Opuha Scheme's hydroelectricity generation component should be made to ensure alignment/consistency with unchallenged aspects of the Independent Commissioners' decision on PC18.

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		<p>b. <u>are provided for, including their development, operation, maintenance and upgrade;</u></p> <p>c. <u>are protected from reverse sensitivity effects; and</u></p> <p>d. <u>provide for the current and future energy needs of the District's communities and economy.</u></p>		<p>the Opuha Scheme's 7.5 MW hydroelectricity generation component. Accordingly, in Chapter 19, the Commissioners:</p> <ul style="list-style-type: none"> included a definition of the hydroelectricity element of the Opuha Scheme; and referred to that Scheme in provisions that cater to the Waitaki Power Scheme. <p>OWL considers that express recognition of the Opuha Scheme in the submitter's proposed revisions to ATC-O4 as notified would be necessary to ensure consistency across the District Plan.</p>	
		<p>Amend Strategic Objective UFD-O1 with an additional sixth clause:</p> <p><i>UFD-O1 Urban Form and Development</i></p> <p><i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i></p> <p><i>2. achieves good connectivity with other parts of the urban area;</i></p> <p><i>3. is supported by appropriate infrastructure;</i></p> <p><i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i></p> <p><i>5. responds to the needs of the community,</i></p>	Support	<p>OWL shares the submitter's view that UFD-O1 should explicitly provide for the protection of renewable electricity generation assets and activities from potential adverse reverse sensitivity effects.</p>	Allow the submission point.

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		<i>including diversity in housing and business opportunities; and</i> <u>6.protects significant infrastructure and activities in the District from reverse sensitivity effects.</u>			
8.	Enviro Waste Services Ltd	Amend Strategic Objective ATC-O3 to include the additional sentence: <i>ATC-O3 Infrastructure</i> <i>The importance of infrastructure to the District and beyond is recognised and provided for. <u>Regionally significant infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.</u></i>	Support	OWL shares the submitter’s view that ATC-O3 should explicitly provide for the protection of regionally significant infrastructure assets and activities from potential adverse reverse sensitivity effects.	Allow the submission point.
11.	Meridian Energy Ltd	Amend the paragraph four of the introduction to Chapter: ATC - A Thriving Community and add a fifth paragraph. <i>There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, as well as development of new infrastructure is important to the well-being of the community of Mackenzie, Canterbury</i>	Support	OWL shares the submitter’s view that the contribution of both existing and new renewable electricity generation in the District should be reflected in the Introduction.	Allow the submission point.

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		<p><i>and nationally. This includes the contribution that <u>existing and new renewable electricity generation and transmission assets located in the District make to the nation.</u></i></p> <p>To be followed by a fifth paragraph:</p> <p><i><u>Part of the nationally significant Waitaki Power Scheme (WPS) is located within the district. The WPS is the largest hydro-electric power scheme in New Zealand and significantly contributes to decarbonising New Zealand's economy, mitigating the potential effects of climate change and reducing the District's reliance on non-renewable energy sources.</u></i></p>			
		<p>Replace notified ATC-O4 with new proposed ATC-O4:</p> <p><i><u>ATC – O4 Renewable Energy</u></i> <i>The local, regional and national benefits of the District's renewable electricity generation and electricity transmission assets are recognised and their development, operation, maintenance and upgrade are provided for.</i></p> <p><i><u>Renewable electricity generation activities, including the nationally significant Waitaki</u></i></p>	Support in part	<p>OWL considers that the submitter's proposed expansion of ATC-O4 is appropriate as it provides clarity as regards the way in which the significance of renewable electricity generation activities in the District are to be recognised.</p> <p>However, if ATC-O4 is to expressly recognise specific renewable electricity generation activities such as the Waitaki Power Scheme, OWL considers reference to the Opuha</p>	Allow the submission point in part – if ATC-O4 is amended as requested by the submitter, reference to the Opuha Scheme's hydroelectricity generation component should be made to ensure alignment/consistency with unchallenged aspects of the Independent Commissioners' decision on PC18.

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		<p><u>Power Scheme, and the electricity transmission network:</u></p> <ol style="list-style-type: none"> a. <u>are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u> b. <u>are provided for, including their development, operation, maintenance and upgrade;</u> c. <u>are protected from reverse sensitivity effects; and</u> d. <u>provide for the current and future energy needs of the District's communities and economy.</u> 		<p>Scheme's hydroelectricity generation component should also be made.</p> <p>In this regard, OWL notes that in the Independent Commissioners' decision on PC18 it was accepted that the NPSRE applies to the Opuha Scheme's 7.5 MW hydroelectricity generation component. Accordingly, in Chapter 19, the Commissioners:</p> <ul style="list-style-type: none"> • included a definition of the hydroelectricity element of the Opuha Scheme; and • referred to that Scheme in provisions that cater to the Waitaki Power Scheme. <p>OWL considers that express recognition of the Opuha Scheme in the submitter's proposed revisions to ATC-O4 as notified would be necessary to ensure alignment/consistency across the District Plan.</p>	
		<p>Amend Strategic Objective UFD-O1 with an additional sixth clause:</p> <p><i>UFD-O1 Urban Form and Development</i></p> <ol style="list-style-type: none"> 1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i> 2. <i>achieves good connectivity with other parts of the urban area;</i> 3. <i>is supported by appropriate</i> 	Support	<p>OWL shares the submitter's view that UFD-O1 should explicitly provide for the protection of renewable electricity generation assets and activities from potential adverse reverse sensitivity effects.</p>	Allow the submission point.

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		<p><i>infrastructure;</i></p> <p>4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors;</i>and</p> <p>5. <i>responds to the needs of the community, including diversity in housing and business opportunities;</i> <u>and</u></p> <p><u>6. protects significant infrastructure and activities in the District from reverse sensitivity effects.</u></p>			
14.	Environment Canterbury	<p>Chapter: Cross Boundary Matters should focus on collaboration (as opposed to consultation) and should provide greater detail as to the process of collaboration and the tools that could be used, having regard to the matters outlined in Section 3.1 of the CRPS. The Cross Boundary Chapter also provides an opportunity to acknowledge the non-regulatory collaboration methods currently used such as the Mackenzie Basin Alignment Programme and Te Mōkihi.</p> <p>Retain Strategic Objective ATC-O1 clauses (1) and (3) as notified.</p> <p>Amend ATC-O1 point 2 to read:</p> <p><i>ATC -O1 Live, Work, Play and Visit</i></p> <p>1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i></p>	Support	<p>OWL considers it appropriate for the Cross Boundary Matters Chapter to focus on collaborative processes and tools that could be used in district planning matters.</p>	<p>Allow the submission point.</p>
			Support in part	<p>OWL acknowledges that while the Introduction to the ATC Strategic Objectives refers variously to adverse effects of activities in the District, this appears to have been omitted from the ATC Strategic Objectives.</p> <p>OWL accepts that this omission may need to be addressed. If the submitter's submission is accepted,</p>	<p>If considered appropriate, allow the submission point in part (accept proposed amendment to clause (2) of ATC-O1, subject to any additional amendments required to ensure consistency with the wording of other strategic objectives).</p>

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		<p>2. <i>Activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for, while ensuring adverse environmental effects are managed appropriately; and,</i></p> <p>3. <i>the amenity values and character of different areas are maintained or enhanced.</i></p> <p>Or alternatively add a new Strategic Objective that seeks:</p> <p><u><i>Avoid significant adverse effects on the environment and avoid, remedy or mitigate other adverse effects.</i></u></p>		<p>OWL would prefer the submitter's proposed amendment to clause (2) of ATC-O1, to the alternative Objective offered by the submitter, subject to any amendments being required to ensure consistency with other strategic objectives that address the management of environmental effects (refer OWL's further submission on the submitter's submission on Strategic Objective ATC-O3).</p>	
		<p>Replace Strategic Objective ATC-O2 with:</p> <p><i>ATC-O2 Rural Areas</i> The significant contribution of rural areas to the social, economic and cultural well-being of the District is recognised and provided for.</p> <p><u><i>The natural and physical resources of rural areas that contribute to the wellbeing of the district are maintained and enhanced.</i></u></p>	Support	<p>OWL acknowledges the submitter's observation that as written, ATC-O2 does not explicitly refer to the natural and physical resources that underpin the contribution the rural area makes to the district's wellbeing.</p>	Allow the submission point.
		<p>Replace Strategic Objective ATC-O3 with either of the following:</p> <p><i>ATC – O3 Infrastructure</i></p>	Support in part	<p>OWL supports the submitter's suggestion that the focus of ATC-O3 be on regionally significant infrastructure, rather than less significant types of</p>	<p>If considered appropriate, allow the submission point in part (accept the proposed amendment to ATC-O3, subject to the inclusion of further</p>

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		<p><i>The importance of infrastructure to the District and beyond is recognised and provided for.</i> <i><u>The importance of regionally significant infrastructure is recognised and provided for without major constraints from other activities, while managing its adverse effects.</u></i></p> <p>Or alternatively: <i><u>Regionally significant infrastructure is provided for without major constraints from other activities, while managing its adverse effects.</u></i></p>		<p>infrastructure.</p> <p>OWL notes that the entire Opuha Scheme is classified as regionally significant infrastructure under the Canterbury Regional Policy Statement.</p> <p>OWL acknowledges that while the Introduction to the ATC Strategic Objectives refer variously to adverse effects of activities in the District, this appears to have been omitted from the ATC Strategic Objectives.</p> <p>OWL accepts that this omission may need to be addressed.</p> <p>Should the submitter’s submission be accepted, OWL considers the submitters proposed wording of ACT-O3 should be amended as follows to ensure that regard is had to the economic benefits and technical and operational needs of infrastructure in the management of adverse effects associated with regionally significant infrastructure (additional wording highlighted in yellow):</p> <p><i><u>The importance of regionally significant infrastructure is recognised and provided for without major constraints from other activities,</u></i></p>	<p>wording requiring that regard be had to economic benefits and technical and operational needs of infrastructure when managing adverse effects of the same).</p>

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				<p><i><u>while managing its adverse effects having regard to economic benefits and technical and operational needs of infrastructure.</u></i></p> <p>Such an approach would be consistent with that taken in the Christchurch District Plan (Strategic Objective 3.3.12(3) Infrastructure), which states: <i>The adverse effects of infrastructure on the surrounding environment are managed, having regard to the economic benefits and technical and operational needs of infrastructure.</i></p>	
		<p>Delete Strategic Objective ATC-O4 or replace with:</p> <p><i><u>ATC-O4 Renewable Energy</u></i> <i>The local, regional and national benefits of the District's renewable electricity generation and electricity transmission assets are recognised and their development, operation, maintenance and upgrade are provided for.</i></p> <p><i><u>Important renewable electricity generation and electricity transmission assets are provided for without major constraints from other activities, while managing their adverse effects.</u></i></p>	Support in part	<p>Consistent with OWL's further submissions on other primary submissions on PC20, OWL acknowledges that while the Introduction to the ATC Strategic Objectives refers variously to adverse effects of activities in the District, this appears to have been omitted from the ATC Strategic Objectives.</p> <p>OWL accepts that this omission may need to be addressed.</p> <p>Should the submitter's submission be accepted, OWL considers the submitters proposed wording should be amended as follows to ensure that regard is had to the economic benefits and technical and operational needs of</p>	If considered appropriate, allow the submission point (accept the proposed amendment to ATC-O4, subject to the inclusion of further wording requiring regard to be had to economic benefits and technical and operational needs of infrastructure when managing adverse effects of the same).

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				<p>infrastructure in the management of adverse effects associated with regionally significant infrastructure (additional wording highlighted in yellow):</p> <p><i><u>The importance of regionally significant infrastructure is recognised and provided for without major constraints from other activities, while managing its adverse effects having regard to economic benefits and technical and operational needs of infrastructure.</u></i></p> <p>Such an approach would be consistent with that taken in the Christchurch District Plan (Strategic Objective 3.3.12(3) - Infrastructure), which states: <i>The adverse effects of infrastructure on the surrounding environment are managed, having regard to the economic benefits and technical and operational needs of infrastructure.</i></p>	
		<p>Delete and replace Strategic Objective ATC-O5 and add an additional Strategic Objective ATC-O6 as follows:</p> <p><i>ATC-O5 Adaption and resilience</i> <i>The approach to managing resources allows</i></p>	Support in part	OWL acknowledges the submitter's concerns regarding the limited scope of matters addressed by Strategic Objective ATC-O5 as notified in relation to climate change and natural hazards.	If considered appropriate, allow the submission point.

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		<p>the community to be resilient and adapt appropriately to change, including the effects of climate change.</p> <p><u>The effects of climate change are recognised, and an integrated management approach is adopted, that ensures:</u></p> <ol style="list-style-type: none"> 1. <u>climate change is considered in natural hazards management;</u> 2. <u>the community can adapt to climate change;</u> 3. <u>energy efficiency in urban form and settlement patterns;</u> 4. <u>energy efficient infrastructure.</u> <p><u>ATC- 06</u></p> <p><u>Natural hazard risks are addressed so that:</u></p> <ol style="list-style-type: none"> 1. <u>areas subject to natural hazard risk are identified;</u> 2. <u>development is avoided in areas where the risks of natural hazards to people, property and critical infrastructure are assessed as being unacceptable; and</u> 3. <u>for other areas, natural hazard risks are appropriately mitigated.</u> 			
17.	Nova Energy Limited	<p>Retain “Description of the District” in Part 1: Introduction and General Provisions, but amend to the following:</p> <p><i>The District contains many natural resources of significance, including mahika kai</i></p>	Support	OWL shares the submitter’s view that while the description of the District provides clarity, energy resources are central to the identity of the district and need to be included in the description.	Allow the submission point.

Submission Number	Submitter	Decision Requested by Submitter (Amendments <u>underlined</u> and deletions struck out)	Support/Oppose	Reasons	Decision sought by Opuha Water Limited
		<i>resources, night sky darkness, outstanding natural features and landscapes, significant indigenous biodiversity, and a range of water bodies <u>and energy resources</u>.</i>			
		<p>Amend Strategic Objectives ATC-O3 and ATC-O4 as follows:</p> <p><i>ATC-O3: Infrastructure The importance of <u>existing and appropriate future infrastructure to the District and beyond is recognised and provided for.</u></i></p> <p><i>ATC-O4: Renewable Electricity The local, regional and national benefits of the District's <u>existing and appropriate future renewable electricity generation and electricity transmission assets are recognised, and their development, operation, maintenance and upgrade are provided for.</u></i></p>	Support	OWL share's the submitter's view that it is important that the proposed plan recognises and enables 'appropriate' future development so that there is provision for new energy facilities and infrastructure where appropriate.	Allow the submission point.
		Retain Strategic Objective NE-O1: Natural Environment while reiterating the importance of appropriate future development of infrastructure.	Support	OWL shares the submitter's view that provision for infrastructure development needs to be balanced in consideration with its integration into existing environments.	Allow the submission point.