

Summary of Submissions by Submitter – Notified 16 February 2024
<b>Plan Change 27 to the Mackenzie District Plan - Earthworks, Subdivision, Public Access and Transport</b>

#### 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

Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Robin McCarthy	PC27.01	1.01	Transport				Supports multi-commercial operator use of Tekapo Airport in accordance with Councils original resolution in 1975 and its current Aviation Strategy. The history of the Tekapo Airport and associated resource consents are attached to the submission.	The Council acquires Tekapo Airport to ensure compliance with its Aviation Strategy and ensure competition in aviation services under the Commerce Act.
Bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited	PC27.02	2.01	Earthworks	Objectives and Policies	EW-01, EW-P1, EW-P2	Support	Support the EW Objective and Policies.	Retain as notified.
Bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited	PC27.02	2.02	Earthworks	Rules	EW-R1	Support	It is appropriate to avoid duplication under the PC27 by providing a permitted activity and exemption from any performance standards for earthworks that are provided for under the NESCS.	Retain as notified.
Bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited	PC27.02	2.03	Transport	Rules	TRAN-R8	Support in Part	Supports the inclusion of a permitted pathway for electric vehicle charging stations as it supports a broader network of EV charging stations and therefore greater uptake of EV use in the District. It also aligns with other districts in the region. Minor addition to rule for clarity purposes only.	Amend TRAN-R8 as follows:  TRAN-R8 Electric <u>Vehicle</u> Charging Stations All Zones Activity Status: PER ...
Bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited	PC27.02	2.04	Transport	Rules	TRAN-R7		Support the intent in the Section 32 Report, however, concerned that the rules may be interpreted as applicable to additions, alterations, and maintenance activities where there will be no material change in vehicle movements, such as where there is no change in the number of filling points.	Amend TRAN-R7 as follows:  TRAN-R7 The Development of a New, or Expansion of an Existing Activity that <u>in itself</u> Generates Vehicle Trips that Meet or Exceed the Thresholds Outlined in TRAN-Table 1. All Zones Activity Status: RDIS Where: 1. An Integrated Transport Assessment has been prepared in accordance with TRAN-Table 2 <u>where the new or expanded activity in itself exceeds the thresholds set out in TRAN-Table 1.</u>
Springwater Trust	PC27.04	4.01	Subdivision	Entire Chapter			There is a current proposal from Mackenzie District Council to upgrade wastewater servicing for Lyford Lane to protect the Twizel townships drinking water supply and further subdivision and building should be suspended in the area until the upgrade is in place.	a. MDC should not allow any further building on any lots currently without a building consent until the Lyford Lane waste-water issue is resolved. b. MDC should not allow any further subdivision of any land that relies on the Twizel water supply, until the Lyford Lane waste-water issue is resolved. c. PC 27 should be amended to contain an overriding proviso that no further building consents or subdivision should be approved that rely on the Twizel water supply until the Lyford Lane waste-water issue is resolved. d. should as a matter of urgency resolve the Proposal with Lyford Lane residents.

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Fire and Emergency New Zealand	PC27.05	5.01	Interpretation	Definitions	Contaminant	Support	Support the definition of contaminant being consistent with section 2 of the RMA.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.02	Transport	Objectives	TRAN-O1	Support	Support TRAN-O1 in so far that it provides for a safe and efficient transport network to meet the current and future need of the community.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.03	Transport	Policies	TRAN-P1	Support	Support TRAN-P1 in so far that it provides for a safe and efficient transport network.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.04	Transport	Rules	TRAN-R2	Support in Part	Support in part TRAN-R2 subject to the amendments sought.	Retain as notified subject to amendments sought to TRAN-S11 and associated TRAN-Table 10.
Fire and Emergency New Zealand	PC27.05	5.05	Transport	Rules	TRAN- R3	Support in Part	Support in part TRAN-R3 subject to the amendments sought.	Retain as notified subject to amendments sought to TRAN-S9 and associated TRAN-Table 7.
Fire and Emergency New Zealand	PC27.05	5.06	Transport	Rules	TRAN-R4	Support in Part	Support in part TRAN-R4 subject to the amendments sought.	Retain as notified subject to amendments sought to TRAN-S11 and associated TRAN-Table 10.
Fire and Emergency New Zealand	PC27.05	5.07	Transport	Rules	TRAN-R5	Support in Part	Support in part TRAN-R5 subject to the amendments sought.	Retain as notified subject to amendments sought to TRAN-S8.
Fire and Emergency New Zealand	PC27.05	5.08	Transport	Rules	TRAN-R6	Support in Part	Support in part TRAN-R6 subject to the amendments sought.	Retain as notified subject to amendments sought to TRAN-S8.
Fire and Emergency New Zealand	PC27.05	5.09	Transport	Rules	TRAN-R7	Support in Part	Given Fire and Emergency’s role in protecting the community, emergency service facilities should not be subject to the vehicle trip generation standards (they are not high trip generators) and will only generate vehicle movement during shift change, during emergency response or when training activities are being undertaken onsite. It is considered that all other general transport standards will be sufficient to manage traffic matters, e.g. visibility splays, tracking curves, access design, etc for emergency service facilities. An exemption for emergency services facilities is sought given Fire and emergency's role in protecting the community.	Amend TRAN-R7 as follows: Where: 1. An Integrated Transport Assessment has been prepared in accordance with TRAN-Table 2. <b>Advice Note: TRAN-R7 does not apply to emergency service facilities.</b>
Fire and Emergency New Zealand	PC27.05	5.10	Transport	Tables	TRAN-Table 1	Support in Part	Fire and Emergency request that emergency service facilities have no limit on traffic movements impose. As the table currently reads, Fire and Emergency would come under the Mixed Use and other activities not otherwise listed. As vehicle movements are unable to be determined, require consent as a discretionary activity under TRAN-R7. Fire and Emergency seeks relief through other provisions in the plan to ensure the establishment of emergency service facilities as a permitted activity. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. Fire and Emergency considers an exemption to TRAN-R7 would better provide for health and	Retain as notified subject to the amendment sought TRAN-R7.

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							safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.	
Fire and Emergency New Zealand	PC27.05	5.11	Transport	Tables	TRAN-Table 2	Support in Part	Request that emergency service facilities have no limit on traffic movements imposed. Fire and Emergency seeks relief through other provisions in the plan to ensure the establishment of emergency service facilities as a permitted activity. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. Fire and Emergency considered an exemption to TRAN-R7 would better provide for health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.	Retain as notified subject to the amendment sought TRANS-R7.
Fire and Emergency New Zealand	PC27.05	5.12	Transport	Standards	TRAN-S8	Support in Part	Landscaping should not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut off valves or other emergency response facilities. Such landscaping should be constructed in a way to ensure the signs and facilities are visible/accessible for Fire and Emergency. Where this is not possible, mitigation should not be required.	Amend TRAN-S8 as follows: .... <b>5. Landscaping must not obscure emergency safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.</b>
Fire and Emergency New Zealand	PC27.05	5.13	Transport	Standards	TRAN-S9	Support in Part	Support in part the provisions set out in TRAN-S9 subject to the amendments sought with respect to TRAN-Table 7. The vehicle crossing requirements set out in TRAN-S9 are not considered to be suitable for fire appliances.	Retain as notified subject to the amendment of TRAN-Table 7.
Fire and Emergency New Zealand	PC27.05	5.14	Transport	Tables	TRAN-Table 7	Support in Part	Fire and Emergency require vehicle crossings to have a minimum width of 3.5m to sufficiently cater for fire appliances.	Amend TRAN-Table 7 as follows:  TRAN-Table 7 Vehicle Crossing Width Requirements Land Use Width of Crossing (m) Minimum      Maximum Residential <del>3.0</del> <b>3.5</b> 6.0 Other            4.0      9.0
Fire and Emergency New Zealand	PC27.05	5.15	Transport	Standards	TRAN-S11	Support in Part	The carriageway width requirements set out in TRAN-Table 10 are not considered to be suitable for fire appliances. As such an amendment is sought to TRAN-S11, Table-Table 10.	Retain as notified subject to amendments sought for TRAN-Table 10.
Fire and Emergency New Zealand	PC27.05	5.16	Transport	Tables	TRAN - Table 10	Support in Part	Support in part the provisions and dimensions proposed in table TRAN-Table 10. Where the accessway length is less than 50m, Fire and Emergency would generally operate from the road as a hardstand area. The hose length would be sufficient to reach a building from the road. However, where the accessway length is greater than 50m then Fire and Emergency would need to utilise the accessway as a hardstand and cannot operate from the road, and the hose run length would not be sufficient to reach the building. Therefore, where the accessway length is greater than 50m, Fire and Emergency request that carriageway widths of 4.0m are provided for all accesses to make these suitable for fire appliances.	Within TRAN-Table 10: Amend 'Length(m)' column for RESZ and RLZ for accessways of 1 site and 2-3 sites, and for GRUZ for accessways of 1-3 sites, from <del>any length</del> to <b>0-50</b> .  Amend 'No. Sites' column within RESZ, RLZ and GRUZ with a Length(m) over 50 from <del>4-6</del> to <b>1-6</b> .

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Fire and Emergency New Zealand	PC27.05	5.17	Transport	Standards	TRAN-S12	Support	The turning head and road design requirements are considered suitable for fire appliances.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.18	Transport	Tables	TRAN-Table 11	Support	Road design requirements set out in TRAN- Table 11 are considered to be suitable for fire appliances and pedestrian access for firefighters.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.19	Transport	Tables	TRAN- Table 13	Support	Support the provision for cycle parking requirements at emergency service facilities.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.20	Transport	Matters of Discretion	TRAN-MD2	Support	Support TRAN-MD2 as the effects on the ease and safety of vehicle manoeuvring which includes fire appliances must be considered.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.21	Subdivision	Objectives	SUB-O1	Support	Support as infrastructure, such as firefighting water supply, is to be provided where it is appropriate for the intended use of the subdivision.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.22	Subdivision	Policies	SUB-P5	Support	Provides for safe and efficient access which is considered to include access for fire appliances.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.23	Subdivision	Policies	SUB-P7	Support	Requires there to be adequate capacity of infrastructure, such as firefighting water supply, to service the scale of the development.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.24	Subdivision	Rules	SUB-R1, SUB-R2, SUB-R4 - SUB-R7	Support	Support these provisions as they provide for water supply which encompasses firefighting water supply which encompasses firefighting water supply as a standard which must be complied with as well as the provision of relevant matter of discretion.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.25	Subdivision	Rules	SUB- R3	Support	Support insofar that the subdivision shall consider firefighting water supply through SUB-MD3 Water Supply if the allotment needs to be supplied with infrastructure.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.26	Subdivision	Standards	SUB-S3	Support in Part	Risk that the reticulated water supply may not provide adequate capacity or pressure in accordance with SNZ PAS 4509:2008. As such Fire and Emergency request that provision (1) is amended to enable firefighting water supply to be provided for within the reticulated water supply zone.	Amend SUB-S3 as follows: 1. Every allotment created shall be supplied with a separate connection to a Council reticulated water supply. <b><u>This reticulated water supply shall:</u></b> <b><u>a. The requirement shall Not apply to any allotment created solely for access or network utility operations.</u></b> <b><u>b. Provide a firefighting water supply capacity and pressure sufficient to meet the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS 4509:2008), or shall be in accordance with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.</u></b>
Fire and Emergency New Zealand	PC27.05	5.27	Subdivision	Matters of Discretion	SUB-MD3	Support	Support as it provides for firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand	PC27.05	5.28	Earthworks	Rules	EW-R1	Support	Support as it provides for earthworks for the purposes of firebreaks to be undertaken, enabling preventative mitigation of fire risk to property and life.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	PC27.06	6.01	Subdivision	Objectives	SUB-O1	Support	Clear that subdivision needs to integrate with infrastructure.	Retain as notified.

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Chorus, Connexa, FortySouth, One NZ, Spark**	PC27.06	6.02	Subdivision	Policies	SUB-P7	Support in Part	The integration intent of the policy is supported, however the title of the policy should reflect its direction to provide integration.	Amend title of SUB-P7 as follows: SUB-P7 Infrastructure <u>Integration</u>
Chorus, Connexa, FortySouth, One NZ, Spark**	PC27.06	6.03	Subdivision	Rules	SUB-R3	Support in Part	A specific rule to provide for subdivision that creates infrastructure sites is supported. Given the generally low impact nature of subdivision that creates infrastructure the activity status should be Controlled rather than Restricted Discretionary.	Amend SUB-R3 as follows: Activity Status: <del>RDISCON</del> Where:... Matters of <u>control are discretion are restricted to:</u> Activity status when compliance with standard(s) is not achieved with R3.1- R3.2: <u>RDIS</u>
Chorus, Connexa, FortySouth, One NZ, Spark**	PC27.06	6.04	Earthworks	Introduction		Support in Part	Seek a similar statement to that found in the Infrastructure chapter that earthworks rules do not cover infrastructure activities.	Amend as follows: This earthworks chapter covers general earthworks provisions in all rural, residential, commercial and mixed use and industrial zones. Additional earthworks provisions may apply within overlays such as Outstanding Natural Landscapes and Sites and Areas of Significance to Māori. These earthworks provisions have been included in the respective Overlay chapters because they address the overlay related effects of earthworks on the identified values, characteristics, risks, or features. The earthworks provisions within overlays apply in addition to the provisions of this chapter unless specified otherwise. <u>The chapter does not cover earthworks associated with infrastructure activities, unless it is specified within the rules in the infrastructure chapter that earthworks provisions apply.</u>
Director-General of Conservation	PC27.07	7.01	Plan Change 27	Entire Plan Change		Support in Part	Support the overall approach of PC27. Provisions which are not specifically addressed are supported for the reasons given in the S32 Report.	Retain as notified, except where specific changes are requested.
Director-General of Conservation	PC27.07	7.02	Transport	Entire Chapter		Support	Provides an appropriate framework for management of transport within the District.	Retain as notified.
Director-General of Conservation	PC27.07	7.03	Public Access	Entire Chapter		Oppose in Part	The EPlan version of this plan change provides a hyperlink to the definition of “access” which applies to legal access to properties from the road. This definition is inappropriate in the context of access to public spaces.	Either restrict the use of the defined term “access” to subdivision provisions, or provide a new definition of “public access”.
Director-General of Conservation	PC27.07	7.04	Public Access	Policies	PA-P1	Oppose	Does not recognise that provision of public access can create adverse effects on indigenous biodiversity, cultural and historical values, so is inconsistent with Part 2 of the RMA and Policy 10.3.5 of the Canterbury RPS.	Amend PA-P1 as follows or words to like effect: Require the provision of appropriate public access to and along surface waterbodies listed in PA-SCHED1, <u>except where controls or restrictions on public access are required in order to protect existing environmental values of the waterbody.</u>
Director-General of Conservation	PC27.07	7.05	Public Access	Policies	PA-P2	Oppose	Does not recognise that provision of public access can create adverse effects on indigenous biodiversity, cultural and historical values, so is inconsistent with Part 2 of the RMA and Policy 10.3.5 of the Canterbury RPS.	Amend as follows or words to like effect: “Encourage opportunities and mechanisms to maintain and enhance public access to and along surface waterbodies, including for mahika kai, when a land use or subdivision consent application provides an opportunity for access, with special consideration given to: 1. those waterbodies listed in PA-SCHED2; and 2. the creation of any allotment smaller than 4ha which adjoins a waterbody <u>except where controls or restrictions on public access are required.</u> ”
Director-General of Conservation	PC27.07	7.06	Subdivision	Rules, Standards and Matters of Discretion	SUB-R1 to SUB-R7, SUB-S1 to SUB-S10, and SUB-	Oppose	Fail to recognise the quality of the environment, amenity values and public open space, so do not achieve Objective SUB-O1 or Policies SUB-P2, SUB-P4 and SUB-P6.	Revise these rules, standards and matters of discretion to effectively and consistently protect and provide for the quality of the environment, amenity values and public open space.



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					MD1 to SUB-MD9			
Director-General of Conservation	PC27.07	7.07	Subdivision	Rules and Policies	SUB-R6 and SUB-S8	Oppose	Ōhau River Precinct is close to the largest remaining breeding colony of the Nationally endangered Black-fronted tern/Tarapirohe, and contains a significant population of the Nationally vulnerable Lakes skink. The proposed rule and standard fail to protect significant habitats of indigenous fauna, so do not give effect to s6(c) of the RMA including the populations noted. As such Restricted Discretionary Activity status is not appropriate.	Amend the activity status under SUB-R6 to Discretionary. AND Amend the standards under SUB-S8 to adequately recognise and protect the significant habitats of indigenous fauna in the vicinity.
Director-General of Conservation	PC27.07	7.08	Earthworks	Objectives	EW-O1	Oppose	Objective fails to address the impacts that earthworks can have on natural values and indigenous biodiversity. While addressed elsewhere these matters should be integrated into this objective.	Amend EW-O1 as follows or words to like effect: Earthworks to facilitate subdivision, land use and development are undertaken in a way that minimises adverse effects on landscape values, <b>natural values</b> , visual amenity and mana whenua values and protects the safety of people, property and infrastructure.
Director-General of Conservation	PC27.07	7.09	Earthworks	Rules and Standards	EW-R1 to EW-R4, EW-S1 to EW-S6	Oppose	The matters of control, matters of discretion and standards collectively fail to manage silt and sediment loss, so would not achieve Policy EW-P2 and would risk downstream adverse effects as a result of earthworks.	Revise these rules and standards to effectively and consistently manage silt and sediment loss from earthworks.
Helios Energy Limited	PC27.08	8.01	Transport	Rules	TRAN-R1	Oppose in Part	Helios may need to undertake repair works within a land transport corridor post construction (as recommended in an Integrated Transport Assessment) for any damage caused by contractors during construction. Given this rule’s permitted conditions relate to the works being undertaken by, or on behalf of, a road controlling authority, or undertaken in accordance with an approved subdivision consent, this would mean the positive repair works would require consent under this rule. However, as Helios would require an approved land use consent to undertake a solar farm development which is highly likely to require post-construction repair works. The rule should anticipate and allow for the situation where the repair works can be undertaken in accordance with an approved land use consent.	Amend TRAN-R1 as follows: Where: 1.They are undertaken by, or on behalf of, a road controlling authority; or 2. They are undertaken in accordance with an approved subdivision consent. <b>3. They are undertaken in accordance with an approved land use consent.</b>
Tekapo Landco Limited and Godwit Leisure Limited	PC27.09	9.01	Interpretation	Definitions	Earthworks	Oppose in Part	Further clarification is needed in the definition of “Earthworks” or the chapter as to how volume is calculated for cut and fill, and for cut and fill works undertaken within the same site.	Include clarification in the definition or the chapter as to how volume is calculated for cut and fill, and for cut and fill works undertaken within the same site.
Tekapo Landco Limited and Godwit Leisure Limited	PC27.09	9.02	Earthworks	Rules	EW-R2	Oppose in Part	Include exemption for ‘landscaping’ as this is not necessarily captured by ‘gardening’ and earthworks associated with an approved subdivision. The 500m³ and 2,500m² are limiting to give effect to larger developments, services and roading. It is noted that the Infrastructure Chapter excludes earthworks for infrastructure, however the earthworks standards are still stated to apply to the construction of roads and accessways.	Amend EW-R2 as follows: Activity Status: PER Where: The earthworks are • <b>Earthworks associated with an approved subdivision and undertaken in accordance with a resource consent.</b> • <b>Landscaping</b> ...
Tekapo Landco Limited and	PC27.09	9.03	Earthworks	Rules	EW-R3	Oppose in Part	Seek inclusion for earthworks associated with a consented subdivision – as the 500m³ volume and 2500m² area are limiting to give effect to larger developments and for example	Seek to enable earthworks associated with a consented subdivision as a permitted activity. Amend EW-R3 as follows:

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Godwit Leisure Limited							the installation of infrastructure, services and roading. It is noted that the Infrastructure Chapter excludes earthworks for infrastructure, however the earthworks standards are still stated to apply to the construction of roads and accessways.	<u>Activity Status - Permitted</u> Earthworks directly associated with the development of land for subdivision <del>shall not exceed 500m<sup>3</sup> by volume, and 2,500m<sup>2</sup> by area in any 5-year period: that is subject to an approved resource consent.</del>  Or Alternatively, that the volumes and land area are increased to better reflect the works necessary for installation of infrastructure and services associated with subdivision.
Tekapo Landco Limited and Godwit Leisure Limited	PC27.09	9.04	Subdivision	Rules	SUB-R13	Oppose in Part	It is sought to clarify whether the Lakeside Protection Areas are as reflected on the Operative District Plan, or whether any changes to these areas are proposed.	Confirm whether the Lakeside Protection Areas are the same as the operative layers, or whether any changes to these areas are proposed.
Tekapo Landco Limited and Godwit Leisure Limited	PC27.09	9.05	Subdivision	Standards	SUB-S1.3 and SUB-S1.4	Support	The specified lot sizes are supported and allowance for smaller lot sizes where a land use consent for buildings is sought at the same time is also supported as this will allow for efficient land use and provision of additional housing and business capacity within existing urban areas.	Retain as notified.
Nova Energy Limited	PC27.10	10.01	Earthworks	Entire Chapter		Support	Support the insertion of an Earthworks Chapter as proposed.	Retain as notified.
		10.02	Transport	Entire Chapter		Support	Supports the insertion of a Transport Chapter as proposed.	Retain as notified.
		10.03	Subdivision	Entire Chapter		Support	Support the insertion of a Subdivision Chapter as proposed.	Retain as notified.
		10.04	Public Access	Entire Chapter		Support	Supports the insertion of a Public Access Chapter as proposed.	Retain as notified.
		10.05	Interpretation	Definitions	All	Support	Supports the insertion, amendment and deletion of definitions as proposed.	Retain as notified.
		10.06	Mapping	Zoning and Overlays		Support	Supports the amendments of planning maps, zones and overlays as proposed.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.01	Interpretation	Definitions	National Grid	Support	Support the definition of 'National Grid' and acknowledges that the definition is the same as the definition in the NPS-ET.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.02	Interpretation	Definitions	National Grid Subdivision Corridor	Support	Supports the inclusion of a definition of 'National Grid subdivision corridor' on the basis that such a definition is necessary for the implementation of associated rules and is consistent with the approach sought by Transpower across New Zealand.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.03	Interpretation	Definitions	National Grid Yard	Support	Supports the inclusion of a definition of 'National Grid yard' on the basis that such a definition is necessary for the implementation of associated rules and is consistent with the approach sought by Transpower across New Zealand.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.04	Public Access	Objectives	PA-O1	Oppose	Objective fails to recognise that there are situations where it is necessary to restrict public access in order to protect public health and safety.	Amend Objective PA-O1 as follows: Access to and along surface waterbodies with recreational, scenic, ecological, indigenous biodiversity, conservation, mana whenua or amenity values is maintained or improved <del>unless restriction to access are necessary to protect public health and safety.</del>
Transpower New Zealand Limited	PC27.11	11.05	Public Access	Policies	New Policy PA-PX Restrictions on Public Access	Oppose	Considers that there is a need to recognise and provide for situations where it is necessary to restrict public access in order to protect public health and safety.	Insert a new Policy as follows: <del>PA-PX Restrictions on Public Access</del> <del>Recognise and provide for permanent and temporary restrictions on public access where restrictions are necessary to protect public health and safety.</del>

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Transpower New Zealand Limited	PC27.11	11.06	Subdivision	Objectives	SUB-O1	Oppose	Concerned that Objective SUB-O1 does not describe the role subdivision plays in managing the effects of future land uses and a further clause is required. Transpower considers that this is necessary to provide a 'hook' on which the subsequent policies, that do address effects of subdivision, 'hang'. That is, the policies that relate to subdivision need to implement an objective and, as proposed, there is no clear objective that addresses the recognises the role of subdivision in managing adverse effects of future uses.	Amend Objective SUB-O1 as follows: Subdivision is designed to: 1. align with the purpose and character of the zone in which it occurs; 2. maintain the values of any overlays within which it is located; 3. achieve integration and connectivity with surrounding neighbourhoods; <del>and</del> 4. provide infrastructure that is appropriate for the intended use <del>of the subdivision</del> , which is integrated with existing infrastructure, <del>and</del> 5. <del>avoid conflict between incompatible intended uses.</del>
Transpower New Zealand Limited	PC27.11	11.07	Subdivision	Policies	SUB-P3	Support in Part	Minor amendment required to align the policy with Policy 10 of the NPS-ET.	Amend Policy SUB-P3 as follows: Only allow subdivision within the national grid subdivision corridor where it can be demonstrated that any adverse effects on and from the national grid, including <del>effects on</del> public health and safety, will be appropriately <del>avoided, remedied, or mitigated</del> managed and the operation, maintenance, repair, upgrading and development of the national grid will not be compromised.
Transpower New Zealand Limited	PC27.11	11.08	Subdivision	Rules	SUB-R3	Oppose	<p>Considered that restricted discretionary activity status is overly onerous in situations where the subdivision is for infrastructure and the relevant standards are met, this is not justified in teh s32 report, and a Controlled Activity status is more appropriate. Positive effects should also be given consideration.</p> <p>Further, Transpower seeks that the default activity status in situations where compliance with the conditions and standards in Rule SUB-R3 are not achieved is uniformly restricted discretionary on the basis that the potential effects of such subdivision are sufficiently known and able to be managed through matters of discretion.</p> <p>Seeks that the matters of discretion or, subject to the relief sought by Transpower, the matters of control, provide for a consideration of the positive effects of allowing a subdivision of a site for infrastructure purposes. Insofar as the Rule relates to the National Grid, Transpower is of the view that providing for a consideration of the benefits of the National Grid is necessary to give effect to Policy 1 of the NPS-ET.</p>	<p>Activity Status: <del>RDIS</del> <b>CON</b></p> <p>...</p> <p>SUB-S10 Stormwater Disposal</p> <p>Matters <del>over which control is reserved of discretion are restricted to:</del></p> <p>...</p> <p><del>e. the positive effects of, or benefits of, the access, reserve or infrastructure.</del></p> <p>Activity status when compliance with <del>standard(s) is not achieved with</del> R3.1- R3.2, <del>SUB-2 or SUB-S10</del>: <b>RDIS</b></p> <p><del>Matters of discretion are restricted to:</del></p> <p><del>a. If legal access is to be to a State Highway:</del></p> <p><del>i. Any adverse effects, including cumulative effects on traffic safety, and flow;</del></p> <p><del>ii. Whether access can be obtained from an alternative road that is not a State Highway; and</del></p> <p><del>iii. The design and siting of any accessway or vehicle crossing.</del></p> <p><del>b. Whether the allotment needs to be supplied with infrastructure or services, and if so:</del></p> <p><del>SUB-MD2 Infrastructure</del></p> <p><del>SUB-MD3 Water Supply</del></p> <p><del>SUB-MD4 Stormwater Disposal</del></p> <p><del>SUB-MD6 Easements</del></p> <p><del>SUB-MD9 Wastewater Disposal</del></p> <p><del>c. SUB-MD7 Reverse Sensitivity.</del></p> <p><del>d. Where all or part of the site is within a SASM: SASM-MD1 Activities in a SASM</del></p> <p><del>e. the positive effects of, or benefits of, the access, reserve or infrastructure.</del></p>
Transpower New Zealand Limited	PC27.11	11.09	Subdivision	Rules	SUB-R5	Support in Part	Supports Rule SUB-R5 on the basis that the Rule gives effect to Policies 10 and 11 of the NPS-ET and is consistent with the approach that Transpower seeks to the management of	Amend Rule SUB-R5 as follows: 1. <del>A building platform is identified on, the</del> The subdivision plan demonstrates that each lot is capable of accommodating a building



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							subdivision in the vicinity of the National Grid in district plans across New Zealand. Seek a limited amendment to the Rule to correctly reference NZECP34:2001 and to clarify that the condition in the Rule need only require that each lot is capable of accommodating a building platform outside of the National Grid Yard.	<del>platform located is</del> outside of the national grid yard, <del>and proposed to be secured by way of a consent notice.</del>  Amend Rule SUB-R5, matter of discretion (b) as follows: b. The extent to which the subdivision allows for earthworks, buildings, and structures to comply with the safe distance requirements of the NZECP 34:2001 New Zealand <del>Electrical Electricity</del> Code of Practice for <del>Electrical Electricity</del> Safe Distances.”
Transpower New Zealand Limited	PC27.11	11.10	Subdivision	Standards	SUB-S1	Support in Part	Do not oppose Standard SUB-S1 but, given that this Standard does not apply to Rule SUB-R3, consider that the reference in the Standard to “any allotment created solely for access, reserves, or network utility operations” is not necessary. Transpower therefore seeks that this reference be deleted.	Amend Standard SUB-S1(2) and (5) as follows: Every allotment created shall contain a building square not less than 15m x 15m. <del>This requirement shall not apply to any allotment created solely for access, reserves, or network utility operations.</del>
Transpower New Zealand Limited	PC27.11	11.11	Subdivision	Standards	SUB-S3	Support in Part	Given that this Standard does not apply to Rule SUB-S1, consider that the reference in the Standard to “any allotment created solely for access, reserves, or network utility operations” is not necessary. Transpower therefore seeks that this reference be deleted.	Amend Standard SUB-S3(1) as follows: Every allotment created shall be supplied with a separate connection to a Council reticulated water supply. <del>This requirement shall not apply to any allotment created solely for access or network utility operations.</del>
Transpower New Zealand Limited	PC27.11	11.12	Subdivision	Standards	SUB-S4	Support in Part	Do not oppose Standard SUB-S4 but, given that this Standard does not apply to Rule SUB-R3, consider that the reference in the Standard to “any allotment created solely for access, reserves, or network utility operations” is not necessary. Transpower therefore seeks that this reference be deleted.	Amend Standard SUB-S4(1) as follows: Every allotment created in a township with a Council reticulated wastewater network shall be supplied with a separate connection to that network. <del>This requirement shall not apply to any allotment created solely for access or network utility operations.</del>
Transpower New Zealand Limited	PC27.11	11.13	Subdivision	Standards	SUB-S7	Support in Part	Do not oppose Standard SUB-S& but, given that this Standard does not apply to Rule SUB-R3, consider that the reference in the Standard to “any allotment created solely for access, reserves, or network utility operations” is not necessary. Transpower therefore seeks that this reference be deleted.	Amend Standard SUB-S7(1) as follows: All allotments, <del>other than allotments for access, roads, utilities, or reserves;</del> must be provided with connections at the boundary of the allotment to an electricity supply and telecommunication system networks.
Transpower New Zealand Limited	PC27.11	11.14	Earthworks	Introduction	Advice Note	Oppose	Considers that the Advice Note may result in a gap in the provisions such that there are zones where the rules do not protect the National Grid from the adverse effects of earthworks and land disturbance. Transpower seeks that Standard EW-S6 applies on a districtwide basis and, to achieve this outcome, seeks that the Advice Note be deleted or such alternative relief to have the same effect.	Delete the Advice Note as follows: <del>Advice Note: The rules in this chapter do not apply to the Open Space and Recreation and Special Purpose Zones.</del>
Transpower New Zealand Limited	PC27.11	11.15	Earthworks	Objectives	EW-O1	Support	supports Objective EW-O1 on the basis that, insofar as it relates to the National Grid, the Objective directs the protection of infrastructure from the adverse effects of earthworks in a manner that gives effect to Policy 10 of the NPS-ET.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.16	Earthworks	Policies	EW-P2	Support in Part	Generally supports Policy EW-P2 but is concerned that clause (2) of the Policy could be understood to suggest that earthworks can have ‘reasonable’ effects on the stability of adjoining land, infrastructure, buildings, and structures. Insofar as the Policy relates to the National Grid, Transpower considers that allow adverse effects on the National Grid is contrary to Policy 10 of the NPS-ET. Transpower is of the view that compromising the stability of adjoining land and land	Amend Policy EW-P2 as follows: <del>Allow larger scale earthworks where Manage</del> the adverse effects of earthworks, including their scale and nature, <del>are managed</del> to: 1. minimise adverse effects on the character, values and qualities of the surrounding environment, relative to the sensitivity of the surrounding environment; 2. avoid <del>unreasonable</del> effects on stability of adjoining land, infrastructure, buildings, and structures;

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							uses is inappropriate and the Policy should more clearly direct that this is the case. Additionally considers that Policies EW-P1 and EW-P2 do not directly provide for earthworks other than small-scale earthworks and this creates a policy gap that does not appropriately implement Objective EW-O1 or provide a policy basis for the subsequent rule framework.	3. minimise silt and sediment loss from the site; and 4. ensure that sites are appropriately rehabilitated following completion of earthworks.
Transpower New Zealand Limited	PC27.11	11.17	Earthworks	Rules	EW-R2	Oppose	Opposes Rule EW-R2 because the Rule is not subject to Standard EW-S6 – Proximity to the National Grid. While the activities regulated by Rule EW-R2 are generally small-scale, these earthworks still have the potential to have an adverse effect on the National Grid. It is noted that the definition of ‘earthworks’ excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Instead, these activities fall within the definition of ‘land disturbance’. In order for the Rule to appropriately reflect the definitions and activities that are regulated by the Rule, it is important that the rule also relates to ‘land disturbance’.	Amend Rule EW-R2 to include reference to ‘land disturbance’ as follows: “EW-R2 Earthworks <b>and Land Disturbance</b> General”  Amend Rule EW-R2 as follows: “And the activity complies with the following standards: EW-S4 – Accidental Discovery Protocol <b>EW-S6 – Proximity to the National Grid.</b>
Transpower New Zealand Limited	PC27.11	11.18	Earthworks	Rules	EW-R3	Support	Supports Rule EW-R3 to the extent that the Rule is subject to Standard EW-S6 – Proximity to the National Grid and, as such, gives effect to Policy 10 of the NPS-ET.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.19	Earthworks	Rules	EW-R4	Support	Supports Rule EW-R4 to the extent that the Rule is subject to Standard EW-S6 – Proximity to the National Grid and, as such, gives effect to Policy 10 of the NPS-ET.	Retain as notified.
Transpower New Zealand Limited	PC27.11	11.20	Earthworks	Standards	EW-S6	Support in Part	Supports Standard EW-S6 to the extent that the Standard seeks to manage land disturbance and earthworks in the vicinity of the National Grid in a manner that gives effect to Policy 10 of the NPS-ET and is generally consistent with the requirements established by NZECP34:2001. That said, Transpower notes that the various clauses of the Standard address either earthworks or land disturbance. Due to the nuances of the definitions of ‘earthworks’ and ‘land disturbance’ when considered relative to NZECP34:2001, Transpower considers that limited amendments to the Standard are necessary to ensure consistency with NZECP34 and to ensure that the National Grid is not compromised in a manner consistent with Policy 10 of the NPS-ET.	Amend Standard EW-S6 as follows: 1. The earthworks <b>or land disturbance</b> shall be no deeper than 300mm within 6m of the outer visible edge of a foundation of a national grid transmission line tower or pole. 2. The earthworks <b>or land disturbance</b> shall be no deeper than 3m between 6m and 12m of the outer visible edge of a foundation of a national grid transmission line tower or pole. 3. The <b>earthworks or</b> land disturbance does not compromise the stability of a national grid transmission line tower or pole. 4. The <b>earthworks or</b> land disturbance does not result in a reduction in the ground to conductor clearance distances as required in Table 4 of the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001). 5. The earthworks <b>or land disturbance</b> do not permanently physically impede access to a national grid support structure. Standards EW-R6.1-5 do not apply to the following: ... c. Earthworks <b>or land disturbance</b> that otherwise comply with NZECP 34:2001.
Pukaki Tourism Holdings Limited Partnership and Pukaki Village Holdings Limited	PC27.12	12.01	Earthworks	Introduction	Advice Note	Support	Supports the exclusion of the Special Purpose Zones from the District-Wide earthworks provisions as the Special Purpose Zones will include earthwork provisions that are specific to these areas, and this ensures consistency with the intent and purpose of the Special Purpose Zones.	Retain as notified.

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Douglas McIntyre	PC27.13	13.01	Subdivision	Rules	SUB-R6	Support	The activity status as restricted discretionary, along with the matters of discretion, ensure the subdivision is considered in an appropriate manner.	Retain as notified.
Douglas McIntyre	PC27.13	13.02	Subdivision	Standards	SUB-S1	Support	No minimum allotment size in the Ohau River Precinct is appropriate to ensure a flexible subdivision design that maintains the character and amenity of the site.	Retain as notified.
Douglas McIntyre	PC27.13	13.03	Subdivision	Standards	SUB-S8	Oppose	<p>The number of residential units anticipated on the site was established 10 plus years ago through a resource consent application that was further recognized in a proposed zoning. Costs related to vegetation management, and servicing have increased over time and additional scale by way of additional allotments will better enable funding of these requirements.</p> <p>While there is no control on the maximum building platform apart from being no greater than 700m<sup>2</sup>, the effects of built form within a 1,000m platform could be reduced by limiting the maximum building footprint for future residential units. To allow for the additional dwellings, it is proposed to restrict all building and hardstand surface areas to be a maximum of 500m<sup>2</sup> per site which reduces the maximum are by 200m<sup>2</sup> per allotment as currently notified</p>	Amend SUB-S8 as follows: No more than <del>50</del> 150 residential allotments shall be created within the Ohau River Precinct.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.01	Interpretation	Definitions	Accessway	Support in Part	Generally supports the intent of this definition but seeks clarification on whether the wording ‘net area of the site or sites’ has the same meaning as ‘net site area’ used National Planning Standards definition.	Clarification is requested as per the comments.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.02	Interpretation	Definitions	All Weather Standard	Oppose	Seeks clarifications around definition of ‘all weather standard’. From the definition, it is not clear whether metalled surfaces would be considered pavement, too, or whether there is a requirement for metalling and sealing in order to meet the all weather standard. NZTA requests that in relation to the all weather standard, only sealed surfaces such as asphalt or concrete are included and metalled surfaces should not be allowed to pass the all weather standard.	Clarification is requested as per the comments. The all weather standard definition should only refer to sealed surfaces.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.03	Interpretation	Definitions	Arterial Road	Support	Definition is supported as it appears to be consistent with NZTA’s One Network Road Classification (ONRC) framework. Arterial roads make a significant contribution to social and economic wellbeing, linking regionally significant places, industries, ports or airports. They may be the only route available to important places in a region, performing a ‘lifeline’ function.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.04	Interpretation	Definitions	Heavy Vehicle	Support	Supports this definition as it is in line with NZTA’s Heavy vehicle standards.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.05	Interpretation	Definitions	Land Transport Corridor	Support in Part	Generally supports this definition. However, for clarity, NZTA seeks an amendment to ensure that proposed road constructions within road reserves also fall under the definition of land transport corridor.	Amend definition to the following: means any road reserve containing a formed road <del>or proposed formed road</del> .

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New Zealand Transport Agency, Waka Kotahi	PC27.14	14.06	Interpretation	Definitions	Land Transport Infrastructure	Support in Part	Generally supports this definition. However, several changes are requested for clarity.	Amend definition to the following: means any infrastructure, building, equipment or devices that support the movement of people and goods by land, including: ... c. roads including carriageways, pavements <b>and surfacing</b> , bridges, tunnels, <b>culverts</b> , retaining walls, underpasses, overpasses, verge and berms; d. lighting, signals, signs and control structures and devices associated with intelligent transport systems including vehicle detection systems (electronic vehicle identification and infra-red vehicle occupancy counters), incident detection, emergency telephones, cables and ducting; e. safety devices including hand rails, bollards, cameras, <b>weather stations</b> road markings, rumble strips, barriers, fences, speed tables and speed cushions and traffic separators; ... j. stormwater management facilities, <b>culverts</b> , ventilation structures, drainage devices and erosion control devices.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.07	Interpretation	Definitions	Local Road	Neutral	Generally supports this definition. However, NZTA reserves the opportunity to provide further submissions and/or evidence at a hearing in case this provision changes as a result of the submissions.	
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.08	Interpretation	Definitions	New Definition - Road Controlling Authority		Suggests that a definition for ‘road controlling authority’ be included as Rule TRAN-R1 refers to it. Further, a change is requested to Matters of Discretion SUB-MD2, where NZTA also seeks a reference to road controlling authority.	Insert a new definition as follows: <b>Road controlling authority – Has the same meaning as in the Land Transport Act 1998.</b>
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.09	Interpretation	Definitions	State Highway	Support	Supports this definition as it refers to the appropriate statute under which state highways are declared.	Means a state highway declared under the Government Roding Powers Act 1989.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.1	Interpretation	Definitions	Transport Network	Support in Part	Supports the general intent of this definition. However, it is not clear what the terms services and mechanisms include and what they do not include. Therefore, for clarity, NZTA seeks the inclusion of any ancillary structure or equipment associated with the transport network within the definition to ensure these are adequately provided for.	Amend the definition to the following: means all transport infrastructure, services and mechanisms that contribute to providing for all forms of transport including multi modal transport and active transport, <b>including all ancillary structures or equipment associated with the transport network.</b>
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.11	Interpretation	Definitions	Vehicle Crossing	Support	Supports this definition	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.12	Interpretation	Definitions	Vehicle Trip	Oppose	Suggests that this definition be replaced with ‘equivalent car movements’	Delete definition for ‘vehicle trip’. Insert new definition for ‘equivalent car movements’: <b>Equivalent car movement per day (averaged over a year) is defined as follows:</b> <b>- 1 car to and from the property = 2 equivalent car movements</b> <b>- 1 truck to and from property = 6 equivalent car movements</b> <b>- 1 truck and trailer to and from property = 10 equivalent car movements.</b>
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.13	Transport	Objectives	TRAN-O1	Support	The objective is supported as it identifies the outcomes for well-connected, integrated and accessible transport infrastructure, which aligns with the statutory functions of NZTA. NZTA also agrees with the requirement to protect the	Retain as notified.

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							transport network from reverse sensitivity effects as land transport infrastructure should not be compromised by incompatible activities that may result in conflict or reverse sensitivity effects on the infrastructure.	
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.14	Transport	Policies	TRAN-P1	Support in Part	Waka Kotahi supports the policy as it supports a transport system that is integrated with the land use and consistent with zoning in which it is located, while also seeking to ensure safe operation of the transport network. However, the policy should be amended to reflect the Land Transport Management Act 2003 by also requiring the maintenance of an effective transport network.	Amend TRAN-P1 as follows: Maintain the safety, <span style="color: red;">effectiveness</span> and efficiency of the District’s transport network by: ...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.15	Transport	Policies	TRAN-P2	Support	Supports the requirement for high trip generating activities to carry out an Integrated Transport Assessments (ITAs). The use of ITAs are critical assessment tools to allow for the appropriate consideration of effects on the transport network; including where upgrades or improvements are required for all modes of transport.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.16	Transport	Policies	TRAN-P3	Support	NZTA supports the policy as it encourages multi-modal connections and active modes of transport, such as cycling and walking.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.17	Transport	Policies	TRAN-P4	Support in Part	supports the policy as it enables the efficient use of existing land transport infrastructure and corridors by enabling works required for operation, maintenance and upgrading of the infrastructure. However, for consistency with other chapters (in particular the Infrastructure chapter) of the district plan and proposed plan changes, it is suggested that the word ‘improve’ is replaced with ‘upgrade’ as that term is defined.	Amend TRAN-P4 as follows: Enable works to be carried out by infrastructure operators to construct, renew, <span style="color: red;">improve upgrade</span> , and operate infrastructure within land transport corridors.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.18	Transport	Rules	TRAN-R1	Support in Part	Support that the development, operation, maintenance, repair or replacement of existing land transport infrastructure is a permitted activitysubject to compliance with Standard TRAN-S12 Road Design Requirements. Request that upgrades be included under this rule, similar to the permitted activity pathway for upgrading above ground infrastructure under Plan Change 26.	Amend TRAN-R1 as follows: Development, Operation, Maintenance, Repair, <span style="color: red;">Upgrades</span> or Replacement of Land Transport Infrastructure Within a Land Transport Corridor. Activity Status: PER Where: ...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.19	Transport	Rules	TRAN-R2	Neutral	Remains neutral in relation to this rule.	No specific relief sought.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.20	Transport	Rules	TRAN-R3	Support in Part	Subject to the Council’s acceptance of the submissions on Standards TRAN-S9 and TRAN-S10 below, NZTA supports the requirement for vehicle crossings to be designed in accordance with Council’s standards.	Retain as notified subject to submissions on standards below and relief sought.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.21	Transport	Rules	TRAN-R4	Support in Part	Subject to the Council’s acceptance of the submissions on Standard TRAN-S11 below, NZTA supports the requirement for vehicle accessways to be designed in accordance with Council’s standards.	Retain as notified subject to submissions on standards below and relief sought.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.23	Transport	Rules	TRAN-R5	Support in Part	Subject to the Council’s acceptance of the submissions on Standard TRAN-S8 below, NZTA supports the requirement for vehicle accessways to be designed in accordance with Council’s standards.	Retain as notified subject to submissions on standards below and relief sought.



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New Zealand Transport Agency, Waka Kotahi	PC27.14	14.24	Transport	Rules	TRAN-R6	Support in Part	Subject to the Council's acceptance of the submissions on various Standards below, NZTA supports the requirement for vehicle manoeuvring requirements on non-residential sites to be designed in accordance with Council's standards.	Retain as notified subject to submissions on standards below and relief sought.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.25	Transport	Rules	TRAN-R7	Oppose in Part	Supports the rule for high trip generating activities along with the matters of discretion for both basic and full ITAs. However, it is recommended that an approach such as the one adopted by Thames-Coromandel District Council, as described by the Environment Court (2019), should be considered for adoption for the Plan. The approach recommended by NZTA refers to equivalent car movements (ECM) and corresponding requirements for a basic, full or no ITA based on the road classification, as provided in the following matrix. NZTA supports the requirement of a resource consent for activities resulting in high numbers of equivalent car movements per day, the requirement to provide an ITA, as well as the matters of discretion.	Replace Table TRAN-Table 1 with a new table that is based on the ECM principle.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.26	Transport	Rules	TRAN-R8	Support in Part	Generally supports. However, NZTA notes that any advertising on the charging stations (including by means of small electrical billboard type advertising) should be limited so that advertising is not visible from a state highway.	Amend TRAN-R8 as follows: Electric Charging Stations Activity Status: PER Where: 1. The charging station is installed immediately adjacent to an existing, permitted, or consented vehicle parking space located in a road corridor, vehicle depot, garage, parking lot or parking area. <b>2. Any advertising on the charging station is not visible from any adjacent state highway.</b> ...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.27	Transport	Standards	TRAN-S3	Support in Part	Supports the provision for mobility parking spaces. However, if mobility parking is required on any site adjacent to a state highway, mobility parking should be provided on-site and not within the adjacent road reserve.	Amend TRAN-S3 as follows: Mobility Parking Requirement ... <b>3. For any site adjacent to a state highway, mobility parking spaces shall be provided on-site and not in the adjacent road reserve.</b>
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.28	Transport	Standards	TRAN-S4	Support	Support this standard requiring provision for sufficient on-site manoeuvring to ensure that no reversing is needed.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.29	Transport	Standards	TRAN-S5	Support	Supports this standard requiring provision of all queuing on-site.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.30	Transport	Standards	TRAN-S6	Support in Part	Support loading spaces being tied to the largest type of vehicle that will be on-site at any one time. The design requirements are considered reasonable. However, NZTA notes that Clause (2)(a) refers to a 3.5m minimum width adjacent to the kerb, while Figure 2 states 3.6m minimum width.	Figure 2 should be corrected to show the same minimum width requirement as the standard.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.31	Transport	Standards	TRAN-S7	Oppose in Part	As per the submission on the definitions above, clarification is sought on the requirements to meet the 'all weather standard'. For the all weather standard in the RESZ, clarification is sought on whether metalled and sealed	That for the RESZ, CMUZ and GIZ, all parking and loading areas are formed, sealed and appropriately drained.

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							means seal on top of a metal surface. Overall, NZTA considers that for the RESZ, CMUZ and GIZ, all parking and loading areas should be formed, sealed and appropriately drained.	
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.32	Transport	Standards	TRAN-S8	Oppose	Consider that there should be no trees planted adjacent to the state highway under Clause 2. Where this is proposed, a consenting pathway would be the appropriate means to facilitate agreement of landscaping plans along state highways road frontages. Further, NZTA requests clarification on whether this standard only applies for sites containing five or more car parking spaces.	Amend TRAN-S8 as follows: TRAN-S8 Landscaping All Zones 1. For sites containing five or more car parking spaces for non-residential activity a landscaping strip must be provided within or immediately adjacent to the parking area with a minimum width or diameter of 1.5m; and 2. The landscaping strip must contain a combination of trees, shrubs, and groundcover; <b>however, for any site fronting a state highway, the landscaping strip must contain a combination of low-growing shrubs and groundcover;</b> and...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.33	Transport	Standards	TRAN-S9	Oppose	Seek minor amendments to Standard TRAN-S9 to ensure appropriate design of vehicle crossings on any state highway.	Amend TRAN-S9 as follows: 1. Any vehicle crossing shall comply with the following: a. for any site fronting a state highway/arterial road that also has frontage to a local road, all vehicle access to the site (providing for either ingress or egress) must be provided to the local road; and b. TRAN-Table 7; and c. TRAN-Figure 3 where the vehicle crossing provides access to a residential unit on a: i. Local road; or ii. Any road where the speed limit is less than 70km/hr; or <b>iii. Where kerb and channel is not provided; or</b> d. TRAN-Figure 4 where the vehicle crossing is located on a state highway/arterial road and where the posted speed limit is greater than 70km/hr and: i. there is an average of one or fewer heavy vehicle trips per week; and ii. there is an average of <b>30 50</b> or fewer vehicle trips per day; or...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.34	Transport	Standards	TRAN-S10	Support in Part	This standard is generally supported as it generally meets NZTA's Planning policy manual – for integrated planning & development of state highways (PPM) and Austroads requirements. However, TRAN-Figure 7 does currently not show how to measure visibility. NZTA therefore suggests that Council adopt NZTA Diagram A – Accessway Sight Lines from NZTA's PPM).	Replace TRAN-Figure 7 with NZTA PPM Diagram A – Accessway Sight Lines.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.35	Transport	Standards	TRAN-S11	Support	Support this standard.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.36	Transport	Standards	TRAN-S12	Support	Support this standard.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.37	Transport	Standards	TRAN-S13	Support	Support the requirement for appropriate road intersection separation distances.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.38	Transport	Matters of Discretion	TRAN-MD1	Support	Support these matters of discretion, and specifically the requirement to consult with NZTA where an activity or works directly affect the state highway network.	Retain as notified.

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Plan Change 27 to the Mackenzie District Plan - Earthworks, Subdivision, Public Access and Transport

Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.39	Transport	Matters of Discretion	TRAN-MD2	Support	Support these matters of discretion, and specifically the encouragement for accessing sites from roads that are not a state highway or an arterial road.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.40	Subdivision	Objectives	SUB-O1	Support	Support the proposed objective as it ensures that any subdivision is designed to provide appropriate infrastructure, such drainage systems and roading infrastructure, that is integrated with existing infrastructure.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.41	Subdivision	Policies	SUB-P5	Support	Policy is supported as it ensures that subdivisions provide for safe and efficient access for a variety of transport choices.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.42	Subdivision	Policies	SUB-P7	Support in Part	Generally support the intent of the policy as it is agreed that infrastructure should be provided to service the development in an integrated manner. However, it is considered that adequate is not always appropriate to support the development over the long term.	Amend SUB-P7 as follows: Infrastructure Require infrastructure with <del>adequate sufficient</del> capacity <del>that is appropriate for the intended purpose to service the</del> and scale of the development, in an integrated manner.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.43	Subdivision	Policies	SUB-P10	Support in Part	Consider that the policy related to reverse sensitivity should be broadened to ensure that these effects are avoided on all regionally significant infrastructure, such as the state highway network, and not just existing renewable electricity generation assets and activities.	Amend SUB-P10 as follows: Reverse Sensitivity Avoid reverse sensitivity effects of subdivision on <del>existing renewable electricity generation assets and activities</del> regionally significant infrastructure.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.44	Subdivision	Rules	SUB-R1	Support	Support SUB-R1 as it requires that each allotment meets the subdivision standards for legal access and corner splays, which ensures that safe and efficient access to the state highway is provided for and maintained. The matters of discretion are also supported.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.45	Subdivision	Rules	SUB-R2	Support	Support SUB-R1 as it requires that each allotment meets the subdivision standards for legal access and corner splays, which ensures that safe and efficient access to the state highway is provided for and maintained. The matters of discretion are also supported.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.46	Subdivision	Rules	SUB-R3	Support	Generally supports the intent of the rule as it provides a consenting pathway to create allotments via subdivision to house infrastructure. However, it is considered that the matters of discretion, specifically a.i. could be clarified by amending flow with efficiency.	Amend the Matter of Discretion in SUB-R3 as follows: Matters of discretion are restricted to: a. If legal access is to be to a state highway: i. Any adverse effects, including cumulative effects on traffic safety, and <del>flow efficiency</del> ; ...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.47	Subdivision	Standards	SUB-S2	Support in Part	Support the standard. However, for clarity it is considered that ‘flow’ in matter of discretion 2.a. should be replaced with ‘efficiency’.	Amend the Matters of discretion in SUB-S2 as follows: RDIS Matters of discretion are restricted to: a. The extent of any adverse effects, including cumulative effects, on traffic safety and traffic <del>flow efficiency</del> along the state highway, associated with the number, design and siting of any existing or proposed vehicle accessway or vehicle crossing...
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.48	Subdivision	Standards	SUB-S5	Support	Support the standards that require suitable walkable blocks for subdivisions in residential and commercial mixed use zones.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.49	Subdivision	Standards	SUB-S6	Support	The standards required for corner splays are supported as it maintains suitable visibility on the corner of intersections which supports the safety and efficiency of the roading network.	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.50	Subdivision	Standards	SUB-S10	Support	Supports that every allotment shall be either connected Council reticulated stormwater system or an on-site stormwater system that is authorised by the Canterbury Regional Council.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.51	Subdivision	Matters of Discretion	SUB-MD1	Support	Support the matters of discretion for design.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.52	Subdivision	Matters of Discretion	SUB-MD2	Support in Part	Generally support this matter of discretion. However, SUB-MD2.a. only refers to the design, siting, layout, and construction of any infrastructure that is vested into Mackenzie District Council as owner or manager or if it connects to any road, reserve or other infrastructure owned or managed by Mackenzie District Council. There are many instances where infrastructure, such as roads, are required to connect to the state highway network. In these instances, it is important for NZTA to understand the design, siting, layout and construction of this infrastructure as to how it can integrate with the state highway network in a safe, efficient and effective manner. It is recommended that this matter be broadened to include 'Road Controlling Authority' or 'Network Utility Operator'.	Amend SUB-MD2 as follows: SUB-MD2 Infrastructure a. The design, siting, layout, and construction of any infrastructure or facility which is proposed to: i. Vest in Mackenzie District Council as owner or manager; or ii. Connect to any road, reserve or other infrastructure which is owned, managed by, or otherwise vested in Mackenzie District Council <b>or the Road Controlling Authority.</b> Or a. The design, siting, layout, and construction of any infrastructure or facility which is proposed to: i. Vest in Mackenzie District Council as owner or manager; or ii. Connect to any road, reserve or other infrastructure which is owned, managed by, or otherwise vested in Mackenzie District Council <b>or Network Utility Operator.</b>
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.53	Subdivision	Matters of Discretion	SUB-MD4	Support	Support the matters of discretion for stormwater disposal as proposed.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.54	Subdivision	Matters of Discretion	SUB-MD5	Support	Support the matters of discretion for transportation networks as proposed, which ensures that any subdivision subject to this assessment appropriately considers how the development will integrate with the transport network and provide for sufficient travel choice. This ensures that the safe and efficient state highway network is maintained.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.55	Subdivision	Matters of Discretion	SUB-MD7	Support in Part	Supports the matters of discretion for reverse sensitivity. However, it is considered that 'minimise' be replaced with 'remedy or mitigate' to align with the RMA effects hierarchy and to improve clarity.	Amend SUB-MD7 as follows: SUB-MD7 Reverse Sensitivity Whether there is a need to provide a separation from zone boundaries, regionally significant infrastructure, transport networks, rural activities and rural industry, or other mitigation measures to avoid, <b>remedy</b> or <b>minimise mitigate</b> potential for reverse sensitivity effects.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.56	Subdivision	Matters of discretion	SUB-MD9	Support	Supports the matters of discretion for wastewater disposal as it provides for appropriate assessment criteria to ensure that appropriate connections and/or on-site treatment and disposal and be provided for.	Retain as notified.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.57	Earthworks	Objectives	EW-O1		The objective and policies do not recognise the benefits and necessity of earthworks for utility operation purposes (repair and maintenance of network utility infrastructure). The objective does not explicitly state that earthworks should be enabled where effects can be managed (through avoidance, remediation or mitigation) and NZTA considers this should be made clear in the objective. While Rule EW-P1 provides for such works, NZTA considers that the efficient operation of	Amend EW-O1 as follows: Earthworks to facilitate subdivision, land use and development, <b>including regionally significant infrastructure, are enabled and</b> are undertaken in a way that minimises adverse effects on landscape values, visual amenity and mana whenua values and protects the safety of people, <b>and</b> property and <b>the safe and efficient operation of</b> infrastructure.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
							infrastructure should also be reflected in the Earthworks objective for consistency. This would also provide a better link to the Rules EW-R1.	
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.58	Earthworks	Policies	EW-P1	Support in Part	Approach is supported in general. However, while Rule EW-P1 provides for repair and maintenance works, NZTA considers that the Earthworks policies should also provide for the repair and maintenance of infrastructure for consistency. This would also provide a better link to the Rules EW-R1.	Amend EW-P1 as follows: Enable small-scale earthworks <b>and earthworks required for the repair and maintenance of infrastructure.</b>  OR Include a separate Policy: <b>Enable earthworks required for the repair and maintenance of infrastructure.</b>
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.59	Earthworks	Policies	EW-P2	Support in Part	Policy EW-P2 is generally supported. However, it is suggested that the term ‘minimise’ under Clause 1 is replaced with ‘avoid, remedy or mitigate’. Further, under Clause 2, while unreasonable effects should generally be avoided, these should also be able to be remedied or mitigated if they cannot be avoided.	Manage the adverse effects of earthworks, including their scale and nature, to: 1. <b>minimise avoid, remedy or mitigate</b> adverse effects on the character, values and qualities of the surrounding environment, relative to the sensitivity of the surrounding environment; 2. avoid, <b>remedy or mitigate</b> unreasonable effects on stability of adjoining land, infrastructure, buildings, and structures; 3. minimise silt and sediment loss from the site; and 4. ensure that sites are appropriately
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.60	Earthworks	Rules	EW-R1	Oppose in Part	Rule EW-R1 provides a permitted activity pathway for repair and maintenance activities, including for roads and associated infrastructure and walking and cycling tracks. This is supported. However, Standard EW-S4, as proposed in its current form is not supported (see below for further detail), and therefore NZTA opposes the current drafting of this rule.	Delete requirement to comply with Standard EW-S4 or redraft this standard.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.61	Earthworks	Rules	EW-R2	Oppose in Part	Generally supports the approach under Rule EW-R2 that earthworks that have been subject to a building consent require no further consideration under the district plan. However, Standard EW-S4, as proposed in its current form is not supported (see below for further detail), and therefore NZTA opposes the current drafting of this rule.	Delete requirement to comply with Standard EW-S4 or redraft this standard.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.62	Earthworks	Rules	EW-R4	Neutral, Oppose in Part	Neutral on the scope of Rule EW-R4 overall. However, Standard EW-S4, as proposed in its current form is not supported (see below for further detail), and therefore NZTA opposes the current drafting of this rule.	Delete requirement to comply with Standard EW-S4 or redraft this standard.
New Zealand Transport Agency, Waka Kotahi	PC27.14	14.63	Earthworks	Standards	EW-S4	Oppose	NZTA operates under Minimum Standard P45 Accidental Archaeological Discovery Specification, which meets the minimum requirements of the organisation’s statutory obligations under the HNZPT Act. The protocol does not apply when NZTA holds an Archaeological Authority for any given project. While the adherence to an accidental discovery protocol during earthworks is supported, we consider that this standard replicates the process required to be followed under the HNZPT Act. It is NZTA’s view that the archaeological authority process is not a planning matter that should be replicated in the district plan, and that there is no need to duplicate the requirements under the HNZPT Act. Clause (h) refers to the Council determining the area within	Delete Standard EW-S4 or rewrite it to make it relevant only to matters outside of the scope of the HNZPT Act processes.



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							which work must cease and any changes to controls on discharges of contaminants. NZTA understands that the discretion over the area within which works must cease following the discovery of archaeological material lies with HNZPT. Further, controls over the discharge of contaminants lies with the regional council as per Section 30 of the RMA, not the territorial authority. If there is a clear resource management purpose that requires an accidental discovery protocol to be in place for matters that are outside of the HNZPT Act process, then this standard requires amendment to reflect only those matters.	
Chorus New Zealand Limited	PC27.15	15.01	Subdivision	Standards	SUB-S7	Support in Part	Supports the intent of SUB-S7 to ensure that telecommunications connections are provided to all new allotments. However, Chorus believes that the standard should be strengthened to require fibre to be provided to the boundary of all new allotments within Residential, Commercial and Mixed Use and General Industrial zones.	Amend SUB-S7 as follows: Electricity Supply and Telecommunications <del>All Zones</del> RESZ, CMUZ, GIZ All allotments, other than allotments for access, roads, utilities, or reserves, must be provided with connections at the boundary of the allotment to an electricity supply and <del>telecommunication system open access fibre</del> networks.  All Other Zones All allotments, other than allotments for access, roads, utilities, or reserves, must be provided with connections at the boundary of the allotment to an electricity supply and telecommunication system networks. ...
Chris and Rachael Pudney	PC27.16	16.01	Subdivision	Standards	SUB-S1	Oppose	Submitter at 20 North Street, The Reserve, Fairlie, within GRUZ Specific Control Area 13, opposes the density under Standard S1 and associated rules and seek rules that enable them to subdivide so that they can have the option of building a dwelling for a family or build 2 smaller dwellings for accommodation on the site.	To exclude the Reserve area from the rural zone plans and reduce the minimum allotment sizes for the area to appropriate sizes ie 3000-5000m².
Timothy Bartlett	PC27.18	18.01	Mapping	Overlays	Community Drinking Water Supply Protection Area	Oppose	Oppose the deleting of the Twizel Water Supply Protection Area and the insertion of a new Community Drinking Water Supply Protection Areas Overlay. Wants the Twizel Water Supply Protection Area to stay because Twizel needs to have their own dedicated water supply for its future growth and not to be changed to a generalized community drinking supply which is to open to another interruption. It needs to be defined.	A dedicated Twizel Water Supply Protection Area. No amendment.
Te Rūnanga o Ngāi Tahu	PC27.19	19.01	Interpretation	Definitions	All	Support	Do not oppose the definitions in PC27 Earthworks, Subdivision, Public Access and Transport provisions.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.02	Transport	Objectives	TRAN-O1	Support	Supports Safe and Efficient Transport Networks.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.03	Transport	Policies	TRAN-P1 - TRAN-P4	Support	Supports safe and efficient Transport policies.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.04	Transport	Rules	TRAN-R1, TRAN-R2	Support	Do not oppose the Safe and Efficient Transport Network Rules TRAN-R1 – TRAN-R2.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.05	Transport	Rules	TRAN-R3-TRAN-R6	Oppose in Part	TRAN R3 – R6 has a wording error and cannot be supported. An activity status for when compliance with permitted standards is not achieved is required.	Amend with new wording to achieve the intent of the plan.

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Te Rūnanga o Ngāi Tahu	PC27.19	19.06	Transport	Rules	TRAN-R7	Support	Supports Safe and Efficient Transport Networks.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.07	Transport	Standards	TRAN-S1 - TRAN-S14	Support	Do not oppose transport standards TRAN-S01 – TRANS-S14 or associated matters of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.08	Public Access	Introduction		Support	Kāi Tahu have a unique relationship with waterbodies and taonga species in their takiwā. The introduction does not erode this relationship	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.09	Public Access	Objectives	PA-O1	Support	Kāi Tahu have a unique relationship with waterbodies and taonga species in their takiwā. Objective PA-01 supports this relationship.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.10	Public Access	Policies	PA-P1 - PA-P2	Support	Kāi Tahu have a unique relationship with waterbodies and taonga species in their takiwā. Policies PA-P1 and PA-P2 support this relationship.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.11	Public Access	Standards	PA-S1	Support in Part	Standard PA-S1 recognises and enables access to mahika kai. However, it is noted that the reference to rule clauses is inconsistent with other parts of the plan.	Retain as notified with the following minor amendment. Where compliance is not achieved with <b>PAS-1.2 or PA-S1.1</b> . ...
Te Rūnanga o Ngāi Tahu	PC27.19	19.12	Subdivision	Introduction		Support	The introduction acknowledges the significance of the effects of subdivision on rural and urban environments.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.13	Subdivision	Objectives	SUB-O1	Support	This Objective outlines the outcomes sought as a result of subdivision including protection of values within overlays such as SASM.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.14	Subdivision	Policies	SUB-P1	Neutral	Te Rūnanga do not oppose Objective SUB-P1.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.15	Subdivision	Policies	SUB-P2	Support	The policy provision provides guidance to how plan users can maintain the amenity values and the quality of environment.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.16	Subdivision	Policies	SUB-P4 - SUB-P8	Support	It is important that subdivisions do not compromise important values and areas within the district. For example, Kāi Tahu values, ONL's and community drinking water supplies. That the relationship of Mana whenua with their traditional places and public safety is protected and that there is adequate infrastructure in place to service any subdivision.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.17	Subdivision	Rules	SUB-R1	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.18	Subdivision	Rules	SUB-R2	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.19	Subdivision	Rules	SUB-R3	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.20	Subdivision	Rules	SUB-R4	Support in Part	Kāi Tahu has a sacred and spiritual connection to the Te Manahuna/Mackenzie Basin. This rule manages the effects of subdivision within this area including any effects the subdivision may have on the relationship of Kāi Tahu with their ancestral lands, waters, wāhi tapu or wāhi taoka.	Amend EW-R4 as follows: Matters of discretion are restricted to: ... c. Whether the subdivision will provide for the relationship of Ngāi Tahu with their ancestral lands, <b>natural night skies</b> , waters, wāhi tapu or wāhi taoka.
Te Rūnanga o Ngāi Tahu	PC27.19	19.21	Subdivision	Rules	SUB-R5	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.

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Te Rūnanga o Ngāi Tahu	PC27.19	19.22	Subdivision	Rules	SUB-R7	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.23	Subdivision	Rules	SUB-R8	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.24	Subdivision	Rules	SUB-R9	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.25	Subdivision	Rules	SUB-R10	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.26	Subdivision	Rules	SUB-R11	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.27	Subdivision	Rules	SUB-R12	Support	It is important that the effects of subdivisions are adequately managed and the effects on SASM (Site of Significance to Māori) is recognised as a matter of discretion.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.28	Subdivision	Rules	SUB-R13	Support	This rule and status recognise the particular features of these areas and greater protection required.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.29	Earthworks	Introduction		Support	The introduction recognises the potential effects of earthworks on Mana whenua values particularly sites of significance to Māori.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.30	Earthworks	Objectives and Policies	EW-O1, EW-P1, EW-P2	Support	The provisions recognise the relationship between the Mackenzie District landscape and Mana whenua.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.31	Earthworks	Standards	EW-S4, all rules, standards, zones	Support	The rules, standards, directions and zones acknowledge the potential adverse effects of earthworks on Ngā Rūnaka values, including Māori Rock Art Protection Areas and SASMs.	Retain as notified.
Te Rūnanga o Ngāi Tahu	PC27.19	19.32	Earthworks	Standards	EW-S1 - EW-S6	Support in Part	Where activities no longer comply with a relevant standard then the effects of that activity could have greater effect on a SASM than what the permitted activity allows for even if there is compliance to the EW-S4 Accidental discovery protocol.	Amend as follows: Include the following matter to the matters of discretion for all of the standards. <b>a. Where any earthworks are within a SASM, those matters in SASM-MD1 Activities in a SASM.</b>
New Zealand Pork	PC27.20	20.01	Earthworks	Policies	EW-P1	Support in Part	EW-P1 limits enabling policy support for only small-scale earthworks. This does not align with the activities listed within permitted earthworks for the purpose of maintenance or repair or general earthworks, many of which are not small scale but are necessary ancillary farming earthworks and typically temporary in nature and affect.	Amend EW-P1 as follows: Enable Earthworks Enable <b>temporary and</b> small-scale earthworks.
New Zealand Pork	PC27.20	20.02	Earthworks	Rules	EW-R1	Oppose in Part	Oppose the limitation of EW-R1 to activities for the purpose of maintenance and repair (not development). Many of the activities listed are necessary ancillary farming earthworks and typically temporary in nature and affect. While some may fall within the permitted activity thresholds of EW-R4, many will not and thereby be subject to a consenting process.	Ancillary farming earthworks (maintenance and repair and development) should be permitted. As an alternative the permitted activity thresholds of EW-R4 should be amended.
New Zealand Pork	PC27.20	20.03	Earthworks	Rules	EW-R2	Support in Part	Support the permitted activity regime for cultivation, holes for trees or other plants, the installation of fence posts, and	Amend EW-R2 as follows:

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
							offal or farm rubbish pit. The permitted activity listing should extend to earthworks associated with burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer and as directed by a person authorised under the Biosecurity Act 1993.	Activity Status: PER Where: 1. The earthworks are: a. subject to a building consent; b. for gardening; c. for cultivation; d. holes for trees or other plants; e. for the installation of fence posts; or f. for an offal or farm rubbish pit. <u>g. For burying of material infected by unwanted organisms as declared by the Ministry for Primary Industries Chief Technical Officer and as directed by a person authorised under the Biosecurity Act 1993.</u> And the activity complies with the following standards: ...
New Zealand Pork	PC27.20	20.04	Earthworks	Rules	EW-R4	Oppose	A discretionary activity status when compliance is not achieved with R4.2 is unnecessarily onerous on necessary ancillary farming earthworks. It is not clear in the s32 why the controlled activity framework for marginally more flexible earthworks and area volume thresholds is an effective or efficient method. If earthworks of up to 1500m <sup>3</sup> by volume and 2500m <sup>2</sup> by area is guaranteed to get consent, a more appropriate framework would establish a RDIS tier.	Amend EW-R4 as follows: Activity Status: PER Where: 1. Earthworks on any site shall not exceed <del>1000m<sup>3</sup></del> <u>1500m<sup>3</sup></u> by volume and <del>1000m<sup>2</sup></del> <u>2500m<sup>2</sup></u> by area per site in any 5-year period. And the activity complies with the following standards: ...  Activity status when compliance is not achieved with R4.1: <del>GON RDIS</del> Where: 2. Earthworks on any site is more than <del>1000m<sup>3</sup></del> <u>but less than 1500m<sup>3</sup></u> by volume, and is more <del>than 1000m<sup>2</sup></del> <u>and less than 2500m<sup>2</sup></u> by area per site in any 5-year period. And the activity complies with the following standards: ... Matters of <del>control-discretion</del> are limited to: ...
New Zealand Pork	PC27.20	20.05	Subdivision	Objectives	SUB-O1	Support in Part	SUB-O1 requires subdivision to align with the purpose and character of the zone in which it occurs. For the rural zone this translates to methods that support and enable primary production and avoid reverse sensitivity.	Retain SUB-O1 with additional new policy support.
New Zealand Pork	PC27.20	20.06	Subdivision	Policies	SUB-P10	Oppose in Part	SUB-P10 is the only subdivision policy relevant to reverse sensitivity and is specific to existing renewable electricity generation assets and activities. This does not then align with the objective SUB-O1 nor the matter of discretion MD7 that extends the consideration to other activities.	Amend SUB-P10 as follows: Avoid reverse sensitivity effects of subdivision on existing renewable electricity generation assets and activities, <u>regionally significant infrastructure, transport networks, primary production activities (including intensive primary production) and rural industry.</u>
New Zealand Pork	PC27.20	20.07	Subdivision	Rules	SUB-R1	Support	Support RDIS activity status for boundary adjustments that enables a focused assessment on relevant matters and the ability to grant consent with conditions or decline consent where the plan outcomes sought are not met.	Retain as notified.
New Zealand Pork	PC27.20	20.08	Subdivision	Rules	SUB-R2	Support	Support RDIS activity status for subdivision meeting the prescribed standards that enables a focused assessment on relevant matters and the ability to grant consent with conditions or decline consent where the plan outcomes sought are not met.	Retain as notified.

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Plan Change 27 to the Mackenzie District Plan - Earthworks, Subdivision, Public Access and Transport								
Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
New Zealand Pork	PC27.20	20.09	Subdivision	Standards	SUB-S1	Oppose in Part	The building square should be identified at time of subdivision as compliant with all applicable land use setback standards.	Amend SUB-S1 as follows: Allotment Size and Dimensions GRUZ 1. Every allotment created shall comply with Table SUB-1. 2. Every allotment created shall contain a building square not less than 15m x 15m <b>demonstrating compliance with all setbacks standards set out in GRUZ.</b> 3. This requirement shall not apply to any allotment created solely for access, reserves, or network utility operations.
New Zealand Pork	PC27.20	20.10	Subdivision	Matters of Discretion	SUB-MD7	Support in Part	The matters of discretion should be extended to a consideration of reverse sensitivity effects on other activities.	Amend SUB-MD7 as follows a. Whether there is a need to provide a separation from zone boundaries, regionally significant infrastructure, transport networks, <b>rural activities primary production activities (including intensive primary production)</b> , and rural industry, or other mitigation measures to avoid or minimise potential for reverse sensitivity effects.
South Canterbury Province, Federated Farmers of New Zealand	PC27.21	21.01	Earthworks	Objectives and Policies	EW-O1, EW-P1, EW-P2	Support	Support the objective and two policies as notified.	Retain as notified.
South Canterbury Province, Federated Farmers of New Zealand	PC27.21	21.02	Earthworks	Rules	EW-R1 and EW-R2	Support	These rules enable routine farming practices to be undertaken as a permitted activity.	Retain as notified.
South Canterbury Province, Federated Farmers of New Zealand	PC27.21	21.03	Earthworks	Rules	EW-R4	Support in Part	Endorse the stepped approach taken by MDC that as earthwork quantity limits change so does the corresponding activity status. The quantity limits are appropriate for each status, however we seek that the time period is amended from 5 years to 12 months.	Amend EW-R4 1. Earthworks on any site shall not exceed 1000m <sup>3</sup> by volume and 1000m <sup>2</sup> by area per <b>site</b> in any <b>5-year 12 month</b> period.  Also seek the consequential change to EW-R4 2.
South Canterbury Province, Federated Farmers of New Zealand	PC27.21	21.04	Earthworks	Standards	EW-S1 to EW-S6	Support	Support the notified standards EW-S1 to EW-S6; as they are appropriate and consistent with other District Plans.	Retain as notified.
South Canterbury Province, Federated Farmers of New Zealand	PC27.21	21.05	Public Access	Objectives and Policies	PA-O1, PA-P1, PA-P2, PA-S1	Support	Provisions align with the direction and process required under the Resource Management Act.	Retain as notified.
Lake Alexandrina Outlet Hutholders Society	PC.27.2 2	22.01	Earthworks	Rules	EW-R1	Support	EW-R1 is considered appropriate.	Retain as notified.
Port Blakely	PC.27.2 3	23.01	Earthworks	Rules	EW-R1, EW-R3, EW-R4	Support in Part	The Plan Changes do not align with these higher order regulations and instead creates another set of regulations on top of those contained in the NES-CF. As mentioned in paragraph 16, this is contrary to the policy objectives of the NES-CF.	Amend to include earthworks undertaken in accordance with NES-CF.



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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Connexa Limited (Connexa), Aotearoa Tower Group (trading as FortySouth), One New Zealand Group Limited (One NZ) and Spark New Zealand Trading Limited (Spark)	PC27.24	24.01	Subdivision	Standards	SUB-S7	Support in Part	Generally support SUB-S7 as it requires all new allotments to be provided with a connection to a telecommunication system network. The matter of discretion SUB-S7.1.a related to whether telecommunication supply is needed for the intended use does not seem a relevant matter and could be amended by integrating SUB-S7.1.a and SUB-S7.1.c. as SUB-S7 is only required for subdivision types that the future activities on these allotments will require the ability to connection to a telecommunications system network.	Amend the Matters of Discretion in SUB-S7 as follows: RDIS Matters of discretion are restricted to: a. Whether an electricity and telecommunication <del>supply</del> connections are needed for the intended use, <del>if not, the method(s) by which prospective purchasers of an allotment are to be informed that these connections are not installed. Note informed would be via Land Information Memorandum or registration on the allotment title or similar methods.</del> b. The suitability of the alternative provision of telecommunication and electricity supply. <del>c. Whether telecommunication and electricity connections shall be made available to any allotment; and, if not, the method(s) by which prospective purchasers of a allotment are to be informed that these connections are not installed.</del>
Road Metals Company Limited	PC27.25	25.01	Subdivision	Policies	SUB-P8	Oppose in Part	It is necessary to provide for subdivision activities in the proposed TISPZ to enable development of this site.	Amend SUB-P8 to add new clause c.: In order to minimise its adverse effects, subdivision in the Te Manahuna / Mackenzie Basin Subzone ONL will not be encouraged except: ... <del>c. Where necessary to enable the development of the TISPZ</del> ....
Road Metals Company Limited	PC27.25	25.02	Subdivision	Standards	SUB-S1	Oppose	A subdivision size of 200 ha is very restrictive. 100 ha would be more appropriate and still provide opportunities for building platforms which do not compromise landscape values. A 200 ha size also means boundary adjustments would become difficult, particularly if an averaging concept is not provided for.	Change the minimum lot size to 100ha or provide an RDIS activity status for subdivision between 100 and 200 ha.
Road Metals Company Limited	PC27.25	25.03	Subdivision and Earthworks	New Provision	New Provision		A rezoning and associated provisions are necessary to give effect to the Twizel Spatial Plan and to provide for adequate industrial land in Twizel following the rezoning of Industrial land to Large Format Retail through Stage 2 of the District Plan review.	Include a zone statement, objectives and policies and any other provisions throughout the MDP to provide for this rezoning. Amend other chapters as proposed and provide for any other necessary or consequential changes to give effect to the rezoning.  Alternatively, rezone the site General Industrial with appropriate development areas and amendments to the General Industrial provisions to reflect the values of the site.
Lisburn Farm Limited	PC27.26	26.01	Subdivision	Standards	SUB-S1.8	Oppose in Part	The notified standard sets a minimum allotment area of not less than 100ha within the GRUZ. LFL is concerned this standard unnecessarily limits landowners' ability to subdivide in the GRUZ which is intended to be conducive to farming and related land uses.	Amend the minimum allotment area and decrease it from <del>100ha</del> to <del>40ha</del> (or similar).
Lisburn Farm Limited	PC27.26	26.02	Subdivision	Standards	SUB-S1.9	Oppose in Part	The notified standard sets a minimum allotment area of not less than 200ha within an ONL. LFL is concerned this standard is unattainable if it decides to subdivide in the future. The large minimum allotment area makes it challenging, at best, to undertake any meaningful development.	Amend the minimum allotment area and decrease it from <del>200ha</del> to <del>100ha</del> (or similar).
Ministry of Education	PC27.27	27.01	Transport	Objectives	TRAN-O1	Support	Supports the promotion of safe and efficient transport networks that meet the needs of all transport users.	Retain as notified.
Ministry of Education	PC27.27	27.02	Transport	Policies	TRAN-P1	Support	Supports TRAN-P1 and acknowledges that educational facilities should be integrated with the transport network.	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Ministry of Education	PC27.27	27.03	Transport	Policies	TRAN-P3	Support	Supports TRAN-P3 as it promotes a wide range of transport options and specifically enables multi-modal connections which tamariki and rangatahi often use as a mode of transport to school.	Retain as notified.
Ministry of Education	PC27.27	27.04	Transport	Rules	TRAN-R6	Support	Supports TRAN-R6 to manage the Parking, Manoeuvring, and Loading Areas Associated with a Non Residential Activity. It is acknowledged that educational facilities may have an operational need to include parking, manoeuvring, and loading areas.	Retain as notified.
Ministry of Education	PC27.27	27.05	Transport	Tables	TRAN-Table 3	Oppose	Do not support TRAN-Table 3, educational facilities on-site carparking given it sets out minimum carparking standards. This is inconsistent with Policy 3.38 of the NPS-UD which states that “a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks”. Mackenzie District Council is a tier 3 territorial authority, as such, is required under the NPS-UD to remove minimum car parking standards.	Request removal of TRAN-Table 3.
Ministry of Education	PC27.27	27.06	Earthworks	Objectives	EW-O1	Support	Supports EW-O1 and acknowledges that educational facilities should minimise adverse effects on earthworks to facilitate land use and development.	Retain as notified.
Ministry of Education	PC27.27	27.07	Earthworks	Policies	EW-P2	Support	Supports EW-P2 and acknowledges that educational facilities should manage the adverse effects.	Retain as notified.
Ministry of Education	PC27.27	27.08	Earthworks	Rules	EW-R4	Support	Supports EW-R4 and acknowledges that educational facilities should comply with the earthworks not specified in EW-R1, EW-R2 or EW-R3, and the listed standards.	Retain as notified.
Genesis Energy Limited	PC27.28	28.01	Public Access	Introduction		Oppose in Part	The introduction is generally supported. However, clarification should be provided that REG activities are managed under the REG chapter of the plan and are not subject to the provisions of this chapter.	Amend the Introduction by including the following paragraph: <b>Renewable electricity generation activities are not subject to the provisions in this chapter.</b>
Genesis Energy Limited	PC27.28	28.02	Earthworks	Introduction		Oppose in Part	The introduction includes an advice note clarifying the exclusion of earthworks within the Open Space Zone and Special Purpose Zones. This is supported; however, the exclusion of earthworks associated with renewable electricity generation activities should also be referred to in the introduction.	Amend the Introduction as follows: ... Advice Note: <b>For avoidance of doubt, the provisions of this chapter do not apply to renewable electricity generation activities which are managed under the Renewable Electricity Generation Chapter.</b> The rules in this chapter <b>also</b> do not apply to the Open Space and Recreation and Special Purpose Zones.
Genesis Energy Limited	PC27.28	28.03	Earthworks	Objectives	EW-O1	Support	Subject to the relief sought on PC26 and submission point 28.02, Genesis support the undertaking of earthworks in a way that minimises adverse effects on landscape values, visual amenity and mana whenua values and protects the safety of people, property and infrastructure.	Retain as notified.
Genesis Energy Limited	PC27.28	28.04	Earthworks	Policies	EW-P1	Support	Subject to the relief sought on PC26 and submission point 28.02, support the enablement of earthworks.	Retain as notified.
Genesis Energy Limited	PC27.28	28.05	Earthworks	Policies	EW-P2	Support	Subject to the relief sought on PC26 and submission point 28.02, the management of the adverse effects of earthworks,	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
							including the scale and nature, to minimise adverse effects on the character, values and qualities of the surrounding environment, relative to the sensitivity of the surrounding environment is supported.	
Genesis Energy Limited	PC27.28	28.06	Earthworks	Rules	EW-R1	Support	Subject to the relief sought on PC26 and submission point 28.02, the provision for earthworks associated with the maintenance or repair of existing vehicle tracks, roads and associated infrastructure as a permitted activity is appropriate and is supported.	Retain as notified.
Genesis Energy Limited	PC27.28	28.07	Earthworks	Rules	EW-R2	Support	Subject to the relief sought in the Genesis submission on PC26 and submission point 2 above, the provision for general earthworks as a permitted activity subject to compliance with accidental discovery protocol is supported.	Retain as notified.
Genesis Energy Limited	PC27.28	28.08	Earthworks	Rules	EW-R4	Support	Subject to the relief sought on PC26 and submission point 28.02, the provision for earthworks in the general rural zone that exceeds 150m <sup>3</sup> by volume or 2500m <sup>2</sup> by area in any 5-year period as a Discretionary activity is supported.	Retain as notified.
Genesis Energy Limited	PC27.28	28.09	Subdivision	Introduction		Oppose in Part	The introduction to the Subdivision chapter is generally supported. However, clarification should be provided that REG activities are managed under the REG chapter of the plan and are not subject to the provisions of this chapter.	Amend the Introduction by including the following paragraph: <b>Renewable electricity generation activities are not subject to the provisions in this chapter.</b>
Genesis Energy Limited	PC27.28	28.10	Subdivision	Policies	SUB-P10	Support	Avoidance of reverse sensitivity effects of subdivision on existing renewable electricity generation assets and activities is appropriate and supported.	Retain as notified.
Genesis Energy Limited	PC27.28	28.11	Subdivision	Matters of Discretion	SUB-MD7	Support in Part	Adding the explicit reference to avoiding reverse sensitivity effect on lifeline utility infrastructure is necessary to be consistent with Policy SUB-P10 Reverse Sensitivity.	Amend matter of discretion SUB-MD7 as follows: a. Whether there is a need to provide a separation from zone boundaries, regionally significant infrastructure, <b>lifeline utility infrastructure</b> , transport networks, rural activities and rural industry, or other mitigation measures to avoid or minimise potential for reverse sensitivity effects.
Opuha Water Limited (OWL)	PC27.29	29.01	Public Access	Objectives	PA-O1	Oppose in Part	Objective PA-O1 needs to recognise that health and safety consideration may mean that public access to and along surface waterbodies is not appropriate. This will be the case in locations where OWL scheme infrastructure exists and allowing public access would conflict with OWL’s obligations under the Health and Safety in Work Act 2015. This needs to be acknowledged in PA-O1.	Amend PC-O1 as follows (or to similar effect): Access to and along surface water bodies with recreational, scenic, ecological, indigenous biodiversity, conservation, mana whenua or amenity values is maintained or improved, <b>where appropriate</b> .
Opuha Water Limited (OWL)	PC27.29	29.02	Public Access	Policies	PA-P1	Oppose in Part	Concerned that Policy PA-P1 directs that “the provision of appropriate public access” is required in the Ōpihi River between Opihi Gorge and Stoneleigh Road, which is included in PA-SCHED1. As currently worded, it is unclear whether the Policy expressly allow for situations where public access may not be appropriate in that location. Various OWL scheme infrastructure and infrastructure owned/operated by OWL’s shareholders are located in this stretch of waterway. Requiring public access to areas where this infrastructure is located would conflict with the obligations OWL and its shareholders have under the Health and Safety in Work Act 2015. OWL considers this needs to be acknowledged in PA-P1.	Amend PC-P1 as follows (or to similar effect): Require the provision of <b>appropriate</b> public access to and along surface water bodies listed in PA-SCHED1 <b>where appropriate</b> .

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Opuha Water Limited (OWL)	PC27.29	29.03	Public Access	Policies	PA-P2	Oppose in Part	Concerned that Policy PA-P2 may require public access to be provided along the various surface waterways listed in PA-SCHED2, where OWL scheme infrastructure and infrastructure owned/operated by OWL's shareholders is located. Requiring public access to areas where this infrastructure is located would conflict with the obligations OWL and its shareholders have under the Health and Safety in Work Act 2015. This needs to be acknowledged in PA-P1.	Amend PC-P2 as follows (or to similar effect): Encourage opportunities and mechanisms to maintain and enhance public access to and along surface waterbodies, including for mahika kai, when a land use or subdivision consent application provides opportunities for access, with special consideration given to: 1.Those waterbodies listed in PA-SCHED2; <del>and</del> 2.The creation of any allotment smaller than 4ha which adjoins a waterbody; <del>and</del> <del>3.The implications of providing public access for health and safety obligations.</del>
Opuha Water Limited (OWL)	PC27.29	29.04	Public Access	Standards	PA-S1	Oppose in Part	Concerned that PA-S1 does not reflect the directions of PA-P1 and PA-P2. In particular, PA-P2 directs that consideration will be given to the provision for allotments smaller than 4ha along waterbodies listed in PA-SCHED2. This is not a mandatory direction for the provision of public access, and PA-P1 does not include such directives in relation to allotments smaller than 4ha. OWL considers this error needs to be corrected. Notes it is not clear what public access standard applies for the creation of allotments over 4ha in size or land use consent applications. This needs to be addressed in this chapter, and the matters of discretion listed for RDIS should include health and safety considerations.	Amend PA-S1 to: (a) Align with the directive of PA-P1; (b) Clarify the public access requirements for allotments over 4ha in size or land use consent applications; and (c) Include health and safety considerations as a further matter of discretion.
Opuha Water Limited (OWL)	PC27.29	29.05	Public Access	Schedules	PA-SCHED2	Oppose in Part	PA-SCHED2 includes the following: Waterbody: Opūaha /Opuha River Between Opuha Dam and State Highway 8, Location: Location. OWL notes that it is State Highway 79 that crosses the Opūaha /Opuha River (not State Highway 8). OWL also assumes the words "Between Opuha Dam..." should be in the "Location" column of the table.	Amend PA-SCHED2 as follows: Waterbody: Opūaha /Opuha River <del>Between Opuha Dam and State Highway 8</del> Location: <del>Location Between Opuha Dam and State Highway 79</del>
Opuha Water Limited (OWL)	PC27.29	29.06	Subdivision	Policies		Oppose in Part	The policy direction is not provided for subdivisions to create access, reserve, or to house infrastructure. OWL considers that this would be appropriate and necessary to provide policy guidance on these matters, which are implemented by Rule SUB-R3.	Include new policy guidance for subdivisions to create access, reserve or infrastructure sites.
Opuha Water Limited (OWL)	PC27.29	29.07	Subdivision	Policies	SUB-P10	Oppose in Part	Considers it appropriate for the district plan to provide policy direction in relation to protecting existing renewable energy generation assets/activities from reverse sensitivity effects. However, it considers it would also be appropriate to extend such policy direction to infrastructure more generally, or at the very least, regionally significant infrastructure.	Amend SUB-P10 as follows: Avoid reverse sensitivity effects of subdivision on existing renewable electricity generation assets <del>and infrastructure [or regionally significant infrastructure].</del>
Opuha Water Limited (OWL)	PC27.29	29.08	Subdivision	Rules	SUB-R2	Support	Considers the restricted discretionary status of subdivisions governed by this rule is appropriate.	Retain as notified.
Opuha Water Limited (OWL)	PC27.29	29.09	Subdivision	Rules	SUB-R3	Support	Considers it appropriate for the chapter to provide a standalone rule for subdivision to create access, reserves or infrastructure sites.	Retain as notified.
Opuha Water Limited (OWL)	PC27.29	29.10	Subdivision	Standards	SUB-S1	Support	Considers the standards and activity status for standards that are not complied with in relation to subdivisions in the GRUZ Specific Control Area 13 – Eastern Plains, which	Retain as notified.



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							adjoins Lake Opuha and the Opuha Dam and related infrastructure, are appropriate.	
Opuha Water Limited (OWL)	PC27.29	29.11	Subdivision	Matters of Discretion	SUB-MD7 and 8	Support	Considers the range of matters of discretion in SUB-MD7 and SUB-MD8 are appropriate.	Retain as notified.
Opuha Water Limited (OWL)	PC27.29	29.12	Earthworks	Entire Chapter		Support	Considers it is appropriate that the rules in this chapter do not apply to infrastructure activities, as the INF and REG chapters prevail over the EW chapter.	Retain the approach taken in the district plan review whereby earthworks activities associated with infrastructure and renewable electricity generation activities are governed by the rules in the INF and REG chapters.
Opuha Water Limited (OWL)	PC27.29	29.13	Earthworks	Standards	EW-S4	Support	Notes that EW-S4 (accidental discovery protocol) is required to be complied with under some of the INF/REG rules. OWL considers this is appropriate.	Retain as notified.
Meridian Energy Limited	PC27.30	30.01	Interpretation	Definitions	New Definition - Lifeline Utility		PC27 does not include a definition of lifeline utility infrastructure. PC26 includes such a definition and Meridian considers that the same definition should apply to PC27. Meridian considers this is necessary given their submission on SUB-MD7.	Add new definition: <a href="#">Lifeline utility infrastructure means infrastructure that delivers a service operated by a lifeline utility (as defined in the Civil Defence Emergency Management Act 2002)</a>
Meridian Energy Limited	PC27.30	30.02	Interpretation	Definitions	New Definition - Reverse Sensitivity		The term “reverse sensitivity” is used in the PC27 provisions, but it is not defined in PC27. Meridian considers that the definition for the same term that is included in PC23 should be included in PC27.	Add new definition: <a href="#">Reverse sensitivity means the potential for an approved (whether by consent or designation), lawfully established existing or permitted activity to be compromised, constrained, or curtailed by the more recent establishment, intensification, or alteration of another activity that may be sensitive to the actual, potential or perceived adverse environmental effects generated by the approved, lawfully established existing or permitted activity.</a>
Meridian Energy Limited	PC27.30	30.03	Public Access	Introduction		Oppose in Part	Generally supports the PA-Introduction, but considers 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 PA chapter.	Amend the Introduction by adding the following paragraph: <a href="#">Renewable electricity generation activities are not subject to the provisions in this chapter.</a>
Meridian Energy Limited	PC27.30	30.04	Subdivision	Introduction		Oppose in Part	Generally supports the PA-Introduction, but considers 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 SUB chapter.	Amend the Introduction by adding the following paragraph: <a href="#">Renewable electricity generation activities are not subject to the provisions in this chapter.</a>
Meridian Energy Limited	PC27.30	30.05	Subdivision	Policies	SUB-P10	Support	Supports the avoidance of reverse sensitivity effects of subdivision on existing renewable electricity generation assets and activities.	Retain as notified.
Meridian Energy Limited	PC27.30	30.06	Subdivision	Standards	SUB-S8(2)(a) and (c)	Support	Supports the No-Build Area in the Ōhau River Precinct, and that no building platform shall be located within 100m of waterbodies or hydro canals.	Retain as notified.
Meridian Energy Limited	PC27.30	30.07	Subdivision	Matters of Discretion	SUB-MD7	Oppose in Part	Generally supports discretion being applied to the need to avoid or minimise the potential for reverse sensitivity effects when assessing subdivision activities, but considers that SUB-MD7 should be extended to consider the need for separation from lifeline utilities.	Amend SUB-MD7 as follows: Whether there is a need to provide a separation from zone boundaries, regionally significant infrastructure, transport networks, rural activities and rural industry, <a href="#">and lifeline utility infrastructure</a> , or other mitigation measures to avoid or minimise potential for reverse sensitivity effects.
Meridian Energy Limited	PC27.30	30.08	Earthworks	Introduction		Oppose in Part	Generally supports the EW-Introduction, but considers 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 EW chapter.	Amend the Introduction by adding the following paragraph: <a href="#">Renewable electricity generation activities are not subject to the provisions in this chapter.</a>
Canterbury Regional Council	PC27.31	31.01	Interpretation	Definitions	Cleanfill Material	Support in Part	Definition comes from the National Planning Standards but is missing a letter.	Amend definition: ...



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								e. contaminated soil and other contaminated materials; and f. liquid wastes.
Canterbury Regional Council	PC27.31	31.02	Transport	Entire Chapter		Neutral	Does not request any changes.	No changes requested.
Canterbury Regional Council	PC27.31	31.03	Public Access	Entire Chapter		Neutral	Does not request any changes.	No changes requested.
Canterbury Regional Council	PC27.31	31.04	Subdivision	Entire Chapter		Neutral	Does not request any changes.	No changes requested.
Canterbury Regional Council	PC27.31	31.05	Earthworks	Entire Chapter		Neutral	Does not request any changes.	No changes requested.
The Wolds Station	PC27.33	33.01	Subdivision	Policies and Rules	SUB-P2, SUB-P4 and SUB-R13	Oppose	The NC activity rule should not apply where the subdivision will have no material impact/ change on the listed areas. In addition, SUB-R13 should not apply to subdivision where the lots to be created comply with the listed minimum lot size for the zone. An exemption ought to be provided which enables a more permissive pathway for minor boundary adjustments. Considers that proposed Policy SUB-P2 is unrealistic, on the basis that any subdivision (especially within the Mackenzie Basin ONL) will find it immensely challenging to enhance the amenity values and quality of the environment. Proposed Policy SUB-P4 introduces an excessively onerous policy framework on applicants within the identified natural and cultural environments. “Only allowing” will be interpreted as “avoid” and have the same result – effectively prohibiting subdivision in the listed areas.	That the non-complying activity rule not apply where the resulting blocks remain economic and viable farming units; where the subdivision will not dissect a scenic grassland area etc.; or where a minor boundary adjustment is being undertaken. This is critically important to enable a pathway for farm succession.  Amend the policy framework reflect more achievable standards to provide a clear pathway for subdivision to obtain consent within the listed areas.
The Wolds Station	PC27.33	33.02	Earthworks	Rules	EW-R4	Support	Supports the extension of the proposed earthworks volume thresholds within the rural zone as it is considered to be a more realistic reflection of the expectations within the Rural Zone.	Retain as notified.
The Wolds Station	PC27.33	33.03	Earthworks	Standards	EW-S5	Oppose	All earthworks are proposed to be discretionary in Scenic Viewing and Scenic Grassland Areas. A certain level of earthworks should be permitted. Small scale earthworks do not justify the imposition of a discretionary activity status, and can be achieved so as not to compromise identified environmental values.	That a permitted activity rule be included for small scale earthworks within the Scenic Viewing and Scenic Grassland Areas. This is important to ensure new small scale work programmes can be completed efficiently.
Milward Finlay Lobb	PC27.35	35.01	Subdivision	Standards	SUB-S1	Amend	There is no provision for how land affected by NPS-HPL should be dealt with and this is specifically required by the NPS-HPL.	Add in a reference to LUC1-3 land and stipulate whether it is to be treated differently or not. We would suggest there is no change caused by the overlay in terms of the minimum allotment sizes listed in the Standard and Table.
Milward Finlay Lobb	PC27.35	35.02	Subdivision	Standards	SUB-S1.8	Oppose	With a 40 ha allotment size proposed under a concurrent submission on PC 23 & GRUZ-S1, SUB-S1.8 is also sought to be amended to 40ha.	Amend SUB-S1.8 - The minimum allotment area is no less than <del>100</del> 40ha.
Milward Finlay Lobb	PC27.35	35.03	Subdivision	Standards	SUB-S3	Amend	A 35,000 litre water tank is not commonly available. 30,000 litre water tanks are readily available from a number of manufactures. The standard should also be amended to account for solutions that are approved by FENZ in accordance with the standard Consent Notice wording utilised by MDC.	Amend SUB-S3.1 (other zones) - b. Maintain a minimum of <del>35,000</del> 30,000 litres of drinking water at all times, where the supply and / or storage of the water complies with the Building Act 2004;  and add in

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								<u>e. or any alternative solution provided the written approval of FENZ is obtained.</u>
Milward Finlay Lobb	PC27.35	35.04	Subdivision	Standards	SUB-S7	Oppose	The installation of power and telecommunications connections to networks within all zones at the time of subdivision is unnecessary and often as Council are already aware cost prohibitive. With the advancement in alternative power solutions and also satellite telecommunications such as Starlink, provision for power and internet can be determined within the RLZ & GRUZ zones on an as needed basis, or alternatively if a non-network solution can be demonstrated as being efficient this should be supported.	Amend SUB-S7. 1 to All Zones <u>except RLZ &amp; GRUZ.</u>  Or alternatively add to the the clause the following: All allotments, other than allotments for access, roads, utilities, or reserves, must be provided with connections at the boundary of the allotment to an electricity supply and telecommunication system networks, <u>unless an appropriate non-network solution can be demonstrated.</u>
Milward Finlay Lobb	PC27.35	35.05	Subdivision	Standards	SUB- S1.12	Amend	.12 should refer to a.11 not 1.10 as currently this does not reflect the wording as decided under PC13.	Amend SUBS.1.12 to Where the minimum allotment area is less than 4ha except as provided for by SUB-S1.11.
Milward Finlay Lobb	PC27.35	35.06	Transport	Tables	TRAN-Table 3	Amend	No provision made for residential visitor accommodation - how many parks are expected for this activity? We would suggest it should mirror commercial visitor accommodation.	Residential Visitor Accommodation - 1 space per 5 visitors accommodated.
Milward Finlay Lobb	PC27.35	35.07	Public Access	Standards	PA-S1	Amend	It is more practical to require a strip rather than a reserve and the size of this strip should be reduced to 5m.	Amend PA-S1 as follows: 1. An esplanade <u>strip reserve</u> shall be provided, and vested in Council, where any subdivision creates an allotment smaller than 4ha which adjoins any surface waterbody listed in PA-SCHED1. 2. An esplanade <u>strip reserve</u> shall: a. Provide public access; and b. Have a <u>strip reserve</u> width of 5m at least 20m.
Grampians Station Limited	PC27.36	36.01	Public Access	Objectives	PA-O1	Oppose in Part	The responsibilities of landowners and managers under Health and Safety legislation needs to be recognised and specifically referenced in this policy.	Amend PA-O1 as follows: Access to and along surface waterbodies with recreational, scenic, ecological, indigenous biodiversity, conservation, mana whenua or amenity values is maintained or improved <u>where appropriate, and in a way that ensures health and safety obligations to the public can be met.</u>
Grampians Station Limited	PC27.36	36.02	Subdivision	Policies	SUB-P4	Oppose	The policy wording is overly restrictive. Sufficient protections are already contained elsewhere in the plan.	Delete policy.
Grampians Station Limited	PC27.36	36.03	Subdivision	Rules	SUB-R3	Support		No request sought.
Grampians Station Limited	PC27.36	36.04	Subdivision	Rules	SUB-R4	Support	The addition of the new standards is supported.	Retain as notified.
Grampians Station Limited	PC27.36	36.05	Subdivision	Rules	SUB-R5	Support		Retain as notified.
Grampians Station Limited	PC27.36	36.06	Earthworks	Rules	EW-R1	Support	Common sense rule.	Retain as notified.
Grampians Station Limited	PC27.36	36.07	Earthworks	Rules	EW-R2	Support		Retain as notified.
Grampians Station Limited	PC27.36	36.08	Earthworks	Rules	EW-R3	Support in Part	Activity status is missing.	Add wording: <u>Activity Status: PER</u>
Grampians Station Limited	PC27.36	36.09	Earthworks	Standards	EW-S5	Oppose in Part	Some allowance needs to made for minor ancillary farming earthworks in Scenic Viewing Areas and Scenic Grasslands.	Increase volumes for SVAs and SGs to 20m <sup>3</sup> and 50m <sup>2</sup> .
Grampians Station Limited	PC27.36	36.10	Earthworks	Standards	EW-S6	Support	Recognises the farming activities that are carried out in the proximity of the National Grid.	Retain as notified.

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Mackenzie Properties Limited	PC27.37	37.01	Subdivision	Rules		Oppose	As proposed results in increased compliance costs for applicant and Council, less certainty that a proposal will be approved by Council, and is not an efficient use of resources.	Subdivision activity status should remain as Controlled if all rules, policies and standards are met. This should be applied to all Zones.
New Zealand Defence Force*	PC27.38	38.01	Subdivision	Policies	SUB-P10	Amend	Requests that SUB-P1 0 be amended to broaden its applicability beyond renewable electricity generation assets by including reference to avoiding reverse sensitivity effects of subdivision on other existing lawfully established activities (such as the Tekapo Military Training Area). It is important that reverse sensitivity effects on NZDF facilities is provided in relevant policy frameworks.	Amend SUB-P10 as follows (or similar wording): Avoid reverse sensitivity effects of subdivision on existing renewable electricity generation assets and activities <b>as well as regionally significant infrastructure and any other lawfully established activities.</b>
New Zealand Defence Force*	PC27.38	38.02	Earthworks	Objectives and Policies	EW-O1, EW-P1 and EW-P2	Support	Supports the policy framework which includes provision for small-scale earthworks and ensures effects are appropriately managed.	Retain as notified.
	PC27.38	38.03	Earthworks	Rules	EW-R1 and EW-R4	Support	Supports permitted activity rules for maintenance and repair of existing activities as well as other small-scale earthworks.	Retain as notified.

\* Late submission

\*\*Chorus New Zealand Limited (Chorus), Connexa Limited (Connexa), Aotearoa Tower Group (trading as FortySouth), One New Zealand Group Limited (One NZ) and Spark New Zealand Trading Limited (Spark)