

Further Submission Form – Plan Change 26: Renewable Electricity Generation and Infrastructure

Further Submission on Proposed Plan Change 26 to the Mackenzie District Plan
Form 6 Under Clause 8 of the First Schedule of the RMA 1991

1. Full Name: **Mackenzie Guardians Incorporated**
2. Contact Person: Susan Hall
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6. Fax Number: N/A
7. I am a person who has an interest in the proposal that is greater than the interest that the general public has for the following reasons:
8. (a) Mackenzie Guardians Inc (the Society) was incorporated in 2009. The aims of the Society are to promote the protection of the natural/naturalistic wildlife, water, vegetation, heritage and landscape values of the Mackenzie Country. Since it was formed it has participated in a number of plan and policy development processes in order to achieve its objectives on behalf of concerned members of the community in the Canterbury region.

(b) The Society participated in MDC Plan Change 13 and presented expert landscape and ecological evidence in the Environment Court. The purpose of PC13 is to provide greater protection of the landscape and ecological values of the Mackenzie Basin Subzone from inappropriate subdivision, development and use. The Society is currently a participant in MDC Plan Change 18, the chapter of the Plan that focusses on Indigenous Biodiversity.

9 – 12. Further Submission Details

| Support/oppose the submission of: | Particular parts of the submission that is supported/opposed are: | Reasons for support/opposition are: | Seek that the whole or part of the submission be allowed or disallowed: |
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| Director General of Conservation PC26.03 | Support Point 3.07 Renewable Electricity Generation Entire Chapter | Policies 2 and 3 of the Indigenous Biodiversity chapter are necessary to set the overall approach of protecting and maintaining | Allow |

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| | | indigenous biodiversity. | |
| Director General of Conservation PC26.03 | Support Point 3.08 Renewable Electricity Generation Objectives REG-02 | The wording “appropriately managed” is vague and does not provide effective direction. | Allow |
| Director General of Conservation PC26.03 | Support Point 3.10 Renewable Electricity Generation Rules REG-4 | The DGC amendments to the rule will better manage the effects of future activities. | Allow |
| Environmental Defence Society Inc. (EDS) P.26.10 | Support points 10.01 and 10.02 Infrastructure Policies INF-P5 and INF- P7 | Amendments will align with policy direction in NPSIB. | Allow |
| EDS P.26.10 | Support point 10.03 Infrastructure Matters of discretion or control INF-MD1 | Including an additional matter of discretion requiring indigenous biodiversity effects to be considered will better give effect to the RMA and Planning documents. | Allow |
| EDS P.26.10 | Support Points 10.04, 10.05 and 10.06 Renewable Electricity Generation Policies REG-P4 REG-P5 REG-P6 | Requiring avoidance of adverse effects and including environmental limits will provide stronger protection for Mackenzie landscapes and rare indigenous ecosystems. | Allow |
| EDS P.26.10 | Support Point 10.07 Renewable Electricity Generation Matters of Discretion and Control REG-MD4 | Including an additional matter of discretion requiring the consideration of effects on indigenous biodiversity will give effect to the RMA. | Allow |

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| NZ Transport Agency Waka Kotahi P26.08 | Support Point 8.13 Infrastructure Policies INF-P4 | Adding the RMA wording “avoids, remedies or mitigates” will provide consistency and clarity. The term “minimise” is unclear and uncertain. | Allow |
| Royal Forest and Bird Protection Society (F&B) P26.13 | Support Point 13.01 Renewable Electricity Generation Introduction | Including the entirety of the EIB, NFL, NATC and Zone Chapters in the Introduction list will better give effect to the RMA and Planning documents. | Allow |
| F&B P26.13 | Support Points 13.03 Renewable Electricity Generation Objectives REG-02 | The amendment to include “ to avoid, remedy or mitigate adverse effects on the environment” will be consistent with s5 of the RMA. | Allow |
| F&B P26.13 | Support Points 13.05, 13.06 and 13.07 Renewable Electricity Generation Policies REG-P4 REG-P5 REG-P6 | The addition of two new policies and amendments will provide clarity and consistency and give effect to the RMA. | Allow |
| F&B P26.13 | Support Points 13.08, 13.09,13.10,13.12,13.13 and 13.14 Renewable Electricity Generation Rules REG-R1 REG-R2 REG-R3 REG-R4 REG-R5 REG-R6 | Additions and amendments to the rules and definitions set out by Forest and Bird will help provide a clearer direction to avoiding, remedying and mitigating adverse effects of activities on the Mackenzie’s nationally significant landscapes and rare ecological ecosystems. | Allow |
| F&B P26.13 | Support Point 13.15 Infrastructure Entire Chapter | Amendments to include the EIB chapter in the INF chapter will ensure | Allow |

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| | | consideration of the effects on ecological, natural landscape, features and character. | |
| Genesis Energy Ltd P26.15 | Oppose Point 15.01 Interpretation New Definition | “The term “minimise” is unclear and uncertain and should be changed to “avoid, remedy or mitigate” to provide consistency with RMA. | Disallow |
| Genesis Energy Ltd P26.15 | Oppose Point 15.31 Renewable Electricity Generation Matters of Discretion or Control REG-MD1 | Given the ecological loss that has occurred in the Mackenzie Basin over recent years the indigenous biodiversity and habitats that remain are nationally significant and need to be considered in any upgrade of existing structures | Disallow |

13. The Society wishes to be heard in support of this submission.

14. The Society would be prepared to consider presenting a joint case with others making a similar submission.

Thank you for the opportunity to provide a further submission.
Mackenzie Guardians Inc.

Date: 1 March 2024