



Submission by Genesis Energy Limited

Trading as Genesis

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Mackenzie District Plan Review – Stage 3  
Proposed Plan Change 27  
Earthworks, Subdivision, Public Access and Transport

26 January 2024

## Submission by Genesis Energy Limited

Trading as Genesis

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### Mackenzie District Plan Review – Stage 3 Proposed Plan Change 27 Earthworks, Subdivision, Public Access and Transport

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Date: 26 January 2024

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## 1. Introduction

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Genesis Energy Limited (**Genesis**) welcomes the opportunity to submit on the Proposed Plan Change 27 (**PC27**) relating to the Earthworks, Subdivision, Public Access and Transport Chapters in the Mackenzie District Plan.

Genesis is one of Aotearoa's largest electricity generator and energy retailer with a diverse portfolio of electricity generation assets. The electricity generation profile comprises a range of energy sources, including thermal and renewable energy sources from hydro, wind, and soon, solar.

In the Mackenzie district, Genesis owns and operates the Tekapo Power Scheme (**TekPS**, the **scheme**), which is a part of the nationally significant Waitaki Power Scheme.

In 2024, Genesis, with its joint venture partner FRV Australia, will commence construction of its first solar farm, which is located in the Canterbury region. As part of the Gen35 strategy reset, Genesis will use profits from the Kupe gas field to support a \$1.1 billion programme to build new renewable generation and grid scale battery storage between now and 2030. The investment into solar, grid scale battery storage and wind will help grow Genesis' renewable portfolio to around 8,300 GWh, representing a 160% increase on Genesis' current 3,200 GWh of renewable generation. The Gen35 strategy reset recognizes our role to support electrification of the New Zealand economy, and towards achieving net-zero 2050.

**Section 2** of the submission outlines Genesis' specific submission points, reasons for submission, and the relief sought.

The focus of the specific submission points is to ensure the development, operation, maintenance and upgrade of the existing nationally significant Tekapo Power Scheme (and more broadly the Waitaki Power Scheme) and new renewable electricity generation assets are appropriately enabled within the Mackenzie district. The submissions are made to reflect national direction (such as the National Policy Statement for Renewable Electricity Generation) and assist the district (and New Zealand's) transition to a low-carbon future.

Genesis wishes to be heard in support of this submission. If others make a similar submission, Genesis would be prepared to consider presenting a joint case with them at any hearing.

Genesis does not gain an advantage in trade competition through this submission.

Nāku noa, nā



Karen Sky

**Group Manager Environment and Community**

## 2. Genesis Energy Limited – specific submission points on Plan Change 27 (Earthworks, Subdivision, Public Access and Transport Chapters)

Sub Point	Provision Number	Position	Reasons for submission	Relief sought
<b>PA – Public Access Chapter</b>				
1.	Introduction	Oppose in part	The introduction to the Public Access is generally supported. However, Genesis considers that 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: <u><i>Renewable electricity generation activities are not subject to the provisions in this chapter.</i></u>
<b>EW – Earthworks Chapter</b>				
2.	Introduction	Oppose in part	The introduction to the Earthworks chapter includes an advice note clarifying the exclusion of earthworks within the Open Space Zone and Special Purpose Zones. The exclusion of the earthworks provisions from these zones 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: ... <b>Advice Note:</b> <u><i>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. The rules in this chapter also do not apply to the Open Space and Recreation and Special Purpose Zones.</i></u>
3.	EW-01 Earthworks	Support	Subject to the relief sought in the Gensis submission on PC26 and submission point 2 above (to ensure that all earthworks associated with the development, operation, maintenance and upgrade of REG activities including the construction of new roads and access tracks are not subject to the provisions of the Earthworks Chapter), Genesis support the undertaking of earthworks in a way that minimises adverse effects on landscape values, visual amenity and	Retain Objective EW-01 as notified.

Sub Point	Provision Number	Position	Reasons for submission	Relief sought
			mana whenua values and protects the safety of people, property and infrastructure.	
4.	EW-P1 – Enable Earthworks	Support	Subject to the relief sought in the Genesis submission on PC26 and submission point 2 above (to ensure that all earthworks associated with the development, operation, maintenance and upgrade of REG activities including the construction of new roads and access tracks are not subject to the provisions of the Earthworks Chapter), Genesis support the enablement of earthworks.	Retain Policy EW-P1 as notified.
5.	EW-P2 – Manage Earthworks	Support	Subject to the relief sought in the Genesis submission on PC26 and submission point 2 above (to ensure that all earthworks associated with the development, operation, maintenance and upgrade of REG activities including the construction of new roads and access tracks are not subject to the provisions of the Earthworks Chapter), the management of the adverse effects of earthworks, 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.	Retain Policy EW-P2 as notified.
6.	EW-R1 – Earthworks for Maintenance or Repair of Existing Activities	Support	Subject to the relief sought in the Genesis submission on PC26 and submission point 2 above (to ensure that all earthworks associated with the development, operation, maintenance and upgrade of REG activities including the construction of new roads and access tracks are not subject to the provisions of the Earthworks Chapter), 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 the wording of Rule EW-R1 as notified.

Sub Point	Provision Number	Position	Reasons for submission	Relief sought
7.	EW-R2 – Earthworks General	Support	Subject to the relief sought in the Genesis submission on PC26 and submission point 2 above (to ensure that all earthworks associated with the development, operation, maintenance and upgrade of REG activities including the construction of new roads and access tracks are not subject to the provisions of the Earthworks Chapter), the provision for general earthworks as a permitted activity subject to compliance with accidental discovery protocol is supported.	Retain the wording of Rule EW-R2 as notified.
8.	EW-R4 – Earthworks not specified in EW-R1, EW-R2 or EW-R3	Support	Subject to the relief sought in the Genesis submission on PC26 and submission point 2 above (to ensure that all earthworks associated with the development, operation, maintenance and upgrade of REG activities including the construction of new roads and access tracks are not subject to the provisions of the Earthworks Chapter), to 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 the wording of Rule EW-R4 as notified.
<b>SUB – Subdivision Chapter</b>				
9.	Introduction	Oppose in part	The introduction to the Subdivision chapter is generally supported. However, Genesis considers that 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 SUB Introduction by including the following paragraph: <i><u>Renewable electricity generation activities are not subject to the provisions in this chapter.</u></i>
10.	SUB-P10 – Reverse Sensitivity	Support	Avoidance of reverse sensitivity effects of subdivision on existing renewable electricity generation assets and activities is appropriate and supported.	Retain Policy SUB-P10 as notified.

Sub Point	Provision Number	Position	Reasons for submission	Relief sought
11.	SUB-MD7 – Reverse Sensitivity	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.	<p>Amend matter of discretion SUB-MD7 as follows:</p> <p><i>a. Whether there is a need to provide a separation from zone boundaries, regionally significant infrastructure, <u>lifeline utility infrastructure</u>, transport networks, rural activities and rural industry, or other mitigation measures to avoid or minimise potential for reverse sensitivity effects.</i></p>