

Summary of Submissions by Submitter – Notified 16 February 2024
Plan Change 26 to the Mackenzie District Plan - Renewable Electricity Generation and Infrastructure

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
Fire and Emergency New Zealand	P26.01	1.01	Interpretation	Definitions	Hazardous Substances	Support	Supports the definition of hazardous substances being consistent with section 2 of the RMA.	Retain as notified.
Fire and Emergency New Zealand	P26.01	1.02	Infrastructure	Objectives	INF-O1	Support	Support INF-O1 in so far that it provides infrastructure such as firefighting water supply to meet the needs and provide for the health and safety and wellbeing of people and communities.	Retain as notified.
Fire and Emergency New Zealand	P26.01	1.03	Infrastructure	Objectives	INF-O2	Support	Support INF-O2 in so far that adverse effects of infrastructure can be managed where there is an operational or functional need for the infrastructure such as firefighting water supply.	Retain as notified.
Fire and Emergency New Zealand	P26.01	1.04	Infrastructure	Policies	INF-P2	Support	Support INF-P2 as it enables the operation, maintenance, replacement and upgr4ades to existing infrastructure such as firefighting water supply	Retain as notified.
Fire and Emergency New Zealand	P26.01	1.05	Infrastructure	Policies	INF-P4	Support	Support INF-P4 in so far that it provides for infrastructure such as firefighting water supply where there is an operational and functional need for the infrastructure.	Retain as notified.
Fire and Emergency New Zealand	P26.01	1.06	Infrastructure	Rules	INF-R2	Support	Support the provision for upgrading the above ground infrastructure, specifically the height of a replacement pole or tower. Fire and Emergency towers are typically either lattice towers that can support a siren, aerials and hose drying or are platform towers that can support all the above plus be used for firefighter training. Similarly, poles can support sirens, aerials and hose drying activities. Examples of these structures are attached as Appendix E to the submission. The provision enables the replacement of poles or towers which have a height of the existing pole tower.	Retain as notified.
Fire and Emergency New Zealand	P26.01	1.07	Infrastructure	Standards	INF-S3	Support in Part	Fire and Emergency towers are typically either lattice towers that can support a siren, aerials and hose drying or are platform towers that can support all the above plus be used for firefighter training. Similarly, poles can support sirens, aerials and hose drying activities. Examples of these structures are attached as Appendix E to the submission. The frequency of towers or poles being required at stations is generally dependant on locational and operational requirements of each station. Some existing fire station sites across the country have aerial and sirens mounted on the roof of the building which is not ideal, and Fire and Emergency are slowly rectifying this with the construction of towers and poles. Ideally all stations would have a tower or structure. Fire and Emergency therefore seek an exemption for poles and masts used at emergency service facilities within all other zones.	Amend as follows: ... Except that 1. above does not apply to any lightning rods, antennas, and their associated mounting structures, where these do not exceed: • the maximum height in 1. above by 3.5m, and • either a width of 700mm for a penal antenna or 1.2m in diameter for a dish antenna. <u>Except that 1. above does not apply to poles and masts used for emergency service facilities.</u>
Fire and Emergency New Zealand	P26.01	1.08	Renewable Electricity Generation	Rules	REG-R6	Support in Part	Support in part the provisions REG-R6 for small scale renewable electricity generation activities. Fire and Emergency require the provision for firefighting water supply where a building or structure associated with renewable energy generation is proposed. This will provide Fire and Emergency with the	Outside Areas Specified Below Where: <u>2. Any building or structure, or additions to an existing building or structure shall maintain a firefighting reserve of water of a capacity sufficient to meet the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ</u>

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							<p>minimum water supplies needed to fight a fire and to limit the spread of fire in respect of each building and or structure. Therefore, Fire and Emergency request that provision is included for firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS 4509:2008). Furthermore, Fire and Emergency request that a matter of discretion be implemented for firefighting water supply.</p>	<p>PAS:4509:2008), or shall be in accordance with the alternative firefighting water sources provisions of SNZ PAS 4509:2008. Matters of discretion are restricted to: d. REG-MDX Firefighting Water Supply</p> <p>Outstanding Natural Landscapes ...23. Any building or structure, or additions to an existing building or structure, shall comply with NFL-S1 and NFL-S4. 4. Any building or structure, or additions to an existing building or structure shall maintain a firefighting reserve of water of a capacity sufficient to meet the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS:45092008), or shall be in accordance with the alternative firefighting after sources provisions of SNZ PAS 4509:2008. Matters of discretion are restricted to: ...c. REG-MDX Firefighting Water Supply</p> <p>Scenic Viewing Areas, Scenic Grasslands, Lakeside Protection Areas Where: 35. The activity is limited to additions to an existing building or structure. 6. Any building or structure, or additions to an existing building or structure shall maintain a firefighting reserve of water of a capacity 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 SNA PAS 4509:2008. Matters of discretion are restricted to:b. REG-MDX Firefighting Water Supply</p>
Fire and Emergency New Zealand	P26.01	1.09	Renewable Electricity Generation	Rules	REG-R7	Support in Part	<p>Require the provision for firefighting water supply where a building or structure associated with renewable energy generation is proposed. This will provide Fire and Emergency with the minimum water supplies needed to fight a fire and to limit the spread of fire in respect of each building and or structure associated with the Renewable Electricity Generation. Therefore, Fire and Emergency request that a matter of discretion firefighting water supply is included within the provision for REG-R7.</p>	<p>Amend as follows:</p> <p>Outside Areas Specified Below Activity Status: RDIS REG-MD4 New Renewable Electricity Generation REG-MDX Firefighting Water Supply</p>
Fire and Emergency New Zealand	P26.01	1.10	Renewable Electricity Generation	Matters of Discretion	New Matter of Discretion		<p>There may be a fire risk associated with some renewable energy development. As such, Fire and Emergency seek that the REG chapter provides for a firefighting water supply in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice in order to manage fire risk.</p>	<p>Add as follows: REG-MDX Firefighting Water Supply a. The suitability of the water supply for the intended activities on the site. b. The method by which water will be supplied to each allotment for firefighting, taking into account a risk-based assessment. The assessment shall include (but need not be limited to) the: i. type of the water source; ii. available water pressure;</p>

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								iii. volume of any water storage; and iv. method of accessing the water for firefighting purposes
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.01	Interpretation	Definitions	Regionally Significant Infrastructure	Support in Part	Recognising telecommunication facilities is supported, however the term telecommunications networks is preferred. This aligns with other recently reviewed/operative district plan’s nationally, and a network for telecommunications is defined in the Telecommunications Act 2001, whereas facility is not defined.	Amend as follows: Regionally significant infrastructure Means: b. telecommunication facilities networks
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.02	Interpretation	Definitions	New Definition - Customer Connection	Support in Part	Rule INF-R12 permits customer connections, but there is no definition as to what a customer connection is. The NESTF has a definition of customer connection line which the District Plan should include to provide clarity to the rule.	Amend as follows: <u>Customer Connection</u> <u>Means a telecommunication line that connects a telecommunication distribution network to a premises for the purpose of enabling a facility operator to provide telecommunication services to a customer. National Environmental Standards for Telecommunications Facilities Definition).</u>
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.03	Infrastructure	Introduction		Support	While the telecommunications companies preference is to have an out and out standalone chapter for network utilities which incorporates all overlays and other district wide matters, the rolling review structure for the Operative Mackenzie District Plan means that this is fraught. As such, the clear wording provided in the introduction to the Infrastructure Chapter about which other chapters in the Operative District Plan.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.04	Infrastructure	Objectives	INF-O1	Support	The objective is clear as to what the expectations are for infrastructure in the district.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.05	Infrastructure	Objectives	INF-O2	Support	The objective recognises that infrastructure can have adverse effects but these are to be managed within the functional and operational needs of the infrastructure, alongside the sensitivity of the environment.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.06	Infrastructure	Objectives	INF-O3	Support	The objective appropriately addresses reverse sensitivity effects on regionally significant infrastructure.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.07	Infrastructure	Policies	INF-P1	Support	A policy requiring the benefits of infrastructure to be recognised in decision making on resource consent applications is supported.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.08	Infrastructure	Policies	INF-P2	Support in Part	Clear direction for the ongoing use of existing infrastructure is supported. The policy currently refers to minor upgrades but there is no guidance in the District Plan as to what a minor upgrade is. Upgrade is defined through the Plan Change however, and as such is a more suitable term to use in the policy.	Amend as follows: Enable the operation, maintenance, replacement, reconstruction, and minor upgrades to, existing infrastructure.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.09	Infrastructure	Policies	INF-P3	Support	Integrating infrastructure with land use, subdivision, development and urban growth is essential. Likewise, co-location of structures and facilities and technological improvements and enhancements should be encouraged. The policy achieves this.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.10	Infrastructure	Policies	INF-P4	Support	The policy appropriately recognises that infrastructure can have adverse effects, but requires consideration of any effects in the context of the functional and operational needs of the infrastructure. This is supported.	Retain as notified.

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Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.11	Infrastructure	Policies	INF-P5	Support	The policy encourages the use of road reserve in sensitive or significant areas, which appropriately co-locates infrastructure in an already modified environment in such areas.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.12	Infrastructure	Policies	INF-P6	Support	The policy provides clear guidance as to what infrastructure is appropriate on highly productive land.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.13	Infrastructure	Policies	INF-P7	Support	The policy clearly provides for the National Policy Statement on Infrastructure Biodiversity, and provides effective guidance as to how the policy interacts with INF-P5.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.14	Infrastructure	Policies	INF-P8	Support	The policy is appropriate.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.15	Infrastructure	Rules	INF-R1	Support	Permitted activity status for the operation, maintenance or removal of existing infrastructure, including access tracks is appropriate.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.16	Infrastructure	Rules	INF-R2	Support	Permitted activity status for upgrading above ground infrastructure is appropriate. The standards contained within the rule are clear, and an elevation in activity status to restricted discretionary if compliance cannot be achieved with the standards is supported.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.17	Infrastructure	Rules	INF-R4	Support	Temporary infrastructure as a permitted activity is appropriate. Not requiring compliance with standards is particularly supported, as given the infrastructure is temporary, its associated effects are temporary.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.18	Infrastructure	Rules	INF-R5	Support in Part	A rule permitting sensing and environmental monitoring equipment is supported. Often such equipment requires telecommunications equipment (aside from antennas) to transmit data collected. This can increase the height of the structure. The permitted height for such equipment should be greater than the underlying zone height, as in some instances need to be above the surrounding building heights.	Amend as follows: Activity Status: PER Where: 1. Any structure does not exceed 1.8m in height 5m above the height limit otherwise applying in the zone, precinct or overlay in which the building is located and 6m ² in footprint, but excluding any lightning rods, antennas, earth peak or GPS unit and their associated mounting structures. Note, 1. above does not apply to sensing and environmental monitoring equipment that is attached to a pole. In such an instance, the structures must comply with the permitted standards in INF-S3 for the relevant zone.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.19	Infrastructure	Rules	INF-R6	Support in Part	In general, INF-R6 is supported, however it is unclear why buildings in particular are limited to 50m ² in gross floor area and limited to 4m in height in residential and rural lifestyle zones. The permitted built form standards should be the same as for other buildings in any respective zone.	Amend as follows: Activity Status: PER Where: 1. Any building or structure does not exceed: a. 50m² in the gross floor area or site coverage standard for the zone, precinct or overlay in which the building is located ; and b. 4m in height in any residential or rural lifestyle zone; or c. in other zones ; the height limit otherwise applying in the zone, precinct or overlay 2. Buildings more than 10m ² in gross floor area or over 3.5m in height are meet the set back or height in relation to boundary provisions for the zone, precinct or overlay in which the building is located: a. from the road boundary by a distance of not less than half

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								the height of the structure; and b. from any internal boundary with a residential zone by a distance of not less than half the height of the structure. 3. ...
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.20	Infrastructure	Rules	INF-R7	Support	Below ground infrastructure as permitted standard is supported.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.21	Infrastructure	Rules	INF-R8	Support	Permitted provision for overhead lines is supported.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.22	Infrastructure	Rules	INF-R12	Support	Permitted provision for customer connections is supported.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.23	Infrastructure	Rules	INF-R13	Support	The rules appropriately permits telecommunications which are not regulated by the NESTF.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.24	Infrastructure	Rules	INF-R14	Support	The rule appropriately controls telecommunications which are regulated by, but cannot meet the permitted regulations of, the NESTF.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.25	Infrastructure	Rules	INF-R15	Support	The rule appropriately controls antennas attached to buildings which are regulated by, but cannot meet the permitted regulations of, the NESTF.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.26	Infrastructure	Rules	INF-R16	Support	The rule appropriately controls cabinets which are regulated by, but cannot meet the permitted regulations of, the NESTF.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.27	Infrastructure	Rules	New Rule	Support	A new rule, listed under the “all Infrastructure” subsection, which explicitly permits infrastructure within existing buildings should be included so it is abundantly clear such proposals are permitted.	Amend as follows: All zones: Activity Status: PER Where: 1. The infrastructure is located entirely within an existing building.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.28	Infrastructure	Standards	INF-S1	Support	It is appropriate to encourage infrastructure in sensitive areas to be co-located in road reserve. The standard achieves this.	Retain as notified.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.29	Infrastructure	Standards	INF-S3	Support in Part	<p>In order to provide greater national consistency, and to provide for an efficient mobile/wireless network, and encouragement of co-location on a single pole, changes to the heights are sought.</p> <p>Wording to encourage co-location of two telecommunication network operators on the same pole/tower is also proposed. This is not always appropriate in residential zones, as such the suggested wording excludes permitting additional height in these zones.</p> <p>It is noted that the NESTF states that for telecommunication purposes, rural lifestyles zones are considered rural zones not residential.</p> <p>The exclusion for lightning rods is supported. GPS antenna, which are very small structures, should also be specifically excluded from having to meet the height standards.</p>	<p>Amend as follows:</p> <p>1. The height of any pole, tower or other support structure shall not exceed:</p> <p>a. 5m above the permitted height limit in any residential;commercial and mixed use, or industrial zone.</p> <p>b. 25m-35m in any Rural Zone (including Rural Lifestyle) outside an ONF or ONL.</p> <p>c. 20m in any Rural Zone within an ONF or ONL.</p> <p>d. 25m in any industrial zone.</p> <p>de. 20m in any other zone.</p> <p>2. The heights in 1(b) to 1(e). above can be increased by 5m when two or more telecommunication network operators are located on the same pole or tower.</p> <p>3. Any antennas attached to a pole or tower must not exceed 700mm in width (for panel antenna) or 1.2m in diameter (for</p>

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								<p>dish antenna). No antenna can be mounted so that it projects above the heights provided in 1. or 2. (whichever is applicable).</p> <p>Note, the heights in 1. and 2. Do not apply to lightning rods or GPS antenna.</p> <p>Except that 1. above does not apply to any lightning rods, antennas, and their associated mounting structures, where these do not exceed:</p> <ul style="list-style-type: none"> the maximum height in 1. above by 3.5m, and either a width of 700mm for a penat antenna or 1.2m in diameter for a dish antenna.
Chorus, Connexa, FortySouth, One NZ, Spark**	P26.02	2.30	Mapping	Zoning		Support in Part	It is efficient from an NESTF perspective for district plan maps to show the zoning of legal road. As illustrated in the screenshot in the submission, PC26 shows the zoning of some parts of legal road within the district, but not all.	Amend the Planning Maps so that the zoning for all legal roads in the district is shown.
Director General of Conservation	PC26.03	3.01	Plan Change 26	Entire Plan Change		Support in Part	Supports the overall approach of providing for Infrastructure and Renewable Electricity Generation as giving effect to the relevant higher order documents. For avoidance of doubt, provisions which are not specifically addressed below are supported for the reasons given in the s32 Report.	Retain as notified, expect where specific changes are requested below.
Director General of Conservation	PC26.03	3.02	Interpretation	Definitions	Regionally Significant Infrastructure	Oppose	This definition is inconsistent with the CRPS definition, which also includes renewable electricity generation.	Add a further clause: x. National, regional and local renewable electricity generation activities of any scale.
Director General of Conservation	PC26.03	3.03	Infrastructure	Entire Chapter		Oppose in Part	There is no justification for limiting the applicability of the Ecosystem and Indigenous Biodiversity chapter to only the objective and rules, as policies and methods may also be relevant.	Amend the Introduction as follows: The provisions of other chapter in this District Plan do not apply to activities managed in this chapter, except as follows:... ... The objective and rules in Ecosystems and Indigenous Biodiversity...
Director General of Conservation		3.04	Infrastructure	Policies	INF-P4	Oppose	The reference in clause 2 to the “surrounding” environment could be interpreted as only applying outside the location of the development itself, which would not allow adequate assessment of environmental effects.	Amend as follows, or words to like effect: ...2. It is compatible with the values and anticipated character of the wider surrounding environment; ...
Director General of Conservation	PC26.03	3.05	Infrastructure	Policies	INF-P5	Oppose in Part	<p>This policy adopts an effects management hierarchy approach, which is appropriate, but the drafting could better align with best practice.</p> <p>The policy would allow loss of significant indigenous vegetation and habitats and their values, which is inconsistent with s6(c) and s31(1)(b)(iii) of the RMA, the Objective and Clause 3.10 of the National Policy Statement for Indigenous Biodiversity (NPSIB), and Objective 9.2.3 and Policy 9.3.1 of the CRPS.</p>	Amend as follows, or words to like effect: Avoid locating infrastructure in identified sensitive areas (outside the road reserve) or within an area of significant indigenous vegetation or significant habitat of indigenous fauna, unless: 1. there is a functional or operational need for the infrastructure to be in that location; 2. it is demonstrated through site, route or method selection, design measures and other management methods how significant adverse effects on the values of the sensitive or significant area have been avoided as far as practicable, and otherwise minimised or remedied or mitigated ; 3. where there are more than minor adverse effects that cannot be avoided, minimised or remedied or mitigated , regard is had to any offsetting or compensation; and 4. Following application of 1. - 3. above, there are no

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								significant more than minor residual adverse effects remaining, (except that this clause shall not apply to the national grid).
Director General of Conservation	PC26.03	3.06	Infrastructure	Policies	INF-P7	Support in Part	This policy appropriately manages effects on significant indigenous vegetation and habitats, subject to the application of the effects management hierarchy aligning with best practice.	Retain as notified, subject to changes sought above to INF-P5.
Director General of Conservation		3.07	Renewable Electricity Generation	Entire Chapter		Oppose in Part	There is no justification for excluding Policies 2 and 3 of the Ecosystem and Indigenous Biodiversity chapter from having effect, as these policies set the overall approach to maintaining indigenous biodiversity (noting that regardless of the NPSIB ‘carve-out’ for REG, s6(c) and s31(1)(b)(iii) of the RMA still apply).	Amend the Introduction as follows: The provisions of other chapter in this District Plan do not apply to activities managed in this chapter, except as follows:... ... Ecosystems and Indigenous Biodiversity, but excluding Policies 2 and 3...
Director General of Conservation	PC26.03	3.08	Renewable Electricity Generation	Objectives	REG-O2	Oppose	The reference to “appropriately managed” is so uncertain that it provides no effective direction. The Objective should clearly align with the related policies, methods and rules.	Amend as follows, or words to like effect: The adverse effects of renewable electricity generation activities are appropriately managed avoided as far as practicable within sensitive areas and Sites of Natural Significance [or significant natural areas], and otherwise are minimised.
Director General of Conservation	PC26.03	3.09	Renewable Electricity Generation	Policies	REG-P6	Oppose in Part	This policy adopts an effects management hierarchy approach, which is appropriate, but the drafting could better align with best practice. The policy would allow loss of significant indigenous vegetation and habitats and their values, which is inconsistent with s6(c) and s31(1)(b)(iii) of the RMA, and Objective 9.2.3 and Policy 9.3.1 of the CRPS.	Amend as follows, or words to like effect: Provide for renewable electricity generation activities (not otherwise specified in REG-P4) within areas of significant indigenous vegetation and significant habitats of indigenous fauna, Outstanding Natural Landscapes, Outstanding Natural Features, Sites and Areas of Significance to Māori, riparian areas, or within area of Highly Productive Land, where: 1. there is a functional need or operational need for the activity to be in that location; 2. adverse effects on the values of the area are avoided as far as practicable, including through site, route or method selection, design measures and other management methods; 3. adverse effects that cannot be avoided are minimised or remedied or mitigated , where practicable; 4. regard is had to any offsetting measures or environmental compensation, where there are residual adverse effects that cannot be avoided, minimised or remedied or mitigated ; and following application of 1. - 4. above, there are no more than minor residual significant adverse effects remaining.
Director General of Conservation	PC26.03	3.10	Renewable Electricity Generation	Rules	REG-R4	Oppose	This rule would make any new REG “associated with” an existing hydroelectric power station a controlled activity, with control limited to water levels. This could allow, for example, addition of wind turbines in the vicinity of an existing dam, without any ability to manage the effects of that wind generation.	Amend as follows, or words to like effect: “Where: 1. The development is within the footprint of the existing hydroelectric power station and will not result in an increase in the maximum operating level of a lake or water storage area authorised at the date this rule was notified, or create a new lake or water storage area.” OR Amend the activity status to Discretionary.

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Helios Energy Limited	P26.04	4.01	Interpretation	Definitions	Investigation Activities	Support in Full	A nice clear definition.	No change.
Helios Energy Limited	P26.04	4.02	Interpretation	Definitions	Regionally Significant Infrastructure	Oppose in Part	Electricity generation needs to be included in the definition, not just transmission and distribution. This is because generation infrastructure is an important part of overall electricity infrastructure, as well as there being a need to be consistent with the definition of regionally significant infrastructure in the CRPS, Chapter 5 - Land Use and Infrastructure (page 43) which includes "1. Electricity <u>generation</u> , transmission and distribution". Seek amendment by inserting 'electricity generation infrastructure' into the definition.	Amend as follows: means: a. strategic land transport network and arterial roads b. telecommunication facilities c. the electricity transmission network d. wastewater collection, treatment and disposal networks e. community land drainage infrastructure f. community potable water systems g. established community-scale irrigation and stockwater infrastructure h. electricity distribution network i. electricity generation infrastructure
Helios Energy Limited	P26.04	4.03	Interpretation	Definitions	Transmission Lines	Oppose in Part	The definition does not take into account the transmission infrastructure (such as transmission lines) required from a solar farm to a substation, which may not be part of the National Grid.	Amend as follows: a. means the facilities and structures used for, or associated with, the overhead or underground transmission of electricity to and in the national grid; and...
Helios Energy Limited	P26.04	4.04	Infrastructure	Rules	INF-R5	Support in Part	It is unclear to the Plan user if this rule would apply to meteorological equipment for REG activities.	Suggest a note is provided in Rule INF-R5 and Rule REG-P5 to confirm the status of this rule in relation to Infrastructure and REG activities.
Helios Energy Limited	P26.04	4.05	Infrastructure	Standards	INF-S3	Oppose in Part	<p>The permitted maximum height standard for the Rural Zone within an ONF or ONL is quite restrictive, it is very uncommon to have poles or towers that could meet a maximum 20m height.</p> <p>The permitted maximum height standards in this standard (including both in an outside an ONF or ONL) which would apply to both new and existing pole and tower structures are potentially more restrictive than the permitted activity clause 14(3) of the NES-ETA. Clause 14(3) permits alteration, relocation or replacement structures to be no more than 15% higher than its base height. In certain circumstances this may mean existing support structures Helios needs to alter or replace as part of a solar farm development may meet the NESETA requirements but not the Proposed District Plan.</p> <p>Clause 14(3) of NESETA states: <i>14. Transmission line support structures: Alteration, relocation, and replacement</i> <i>3. If a transmission line support structure is increased in height (including by being replaced with another structure),—</i> <i>(a) the structure may be made no more than 15% higher than its base height; and</i> <i>(b) the additional height must comply with any height restrictions for airport purposes, or any public view shafts, specified in a rule.</i></p> <p>We seek amendment to wording in Standard INF-S3 to differentiate between new structures having maximum heights, and additional wording to differentiate existing poles, tower or other support structures to be consistent with Clause 14 NESETA wording.</p>	Amend as follows: 1. The height of any new pole, tower or other support structure shall not exceed: a. 5m above the permitted height limit in any residential, commercial and mixed use, or industrial zone. b. 25m in any Rural Zone outside an ONF or ONL. c. 205 m in any Rural Zone within an ONF or ONL. d. 20m in any other zone. 2. The increase in height of an existing pole, tower or other support structure shall not exceed the permitted height increase identified in clause 14(3) of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Helios Energy Limited	P26.04	4.06	Energy Infrastructure and Transport	Rules	REG-R5	Support in Full	This rule covers a good range of investigation activities with an expanded timeframe for up to 60 months (from the draft District Plan timeframe which was up to 34 months).	No change.
Helios Energy Limited	P26.04	4.07	Renewable Electricity Generation	Rules	REG-R7	Oppose in Part	The purpose of PC13 was to insert provisions into the District Plan to protect the Mackenzie Basin’s outstanding natural landscapes by implementing additional objectives, policies, rules and changes to planning maps. As this plan change has been completed and there is no ability to change these provisions, it would therefore be more appropriate to have a Restricted Discretionary Activity status for this rule, given the known objectives and policies imposed for the Mackenzie Basin ONL, significant indigenous vegetation, significant habitat of indigenous fauna, effects associated with not meeting setback distances identified in Table NATC-1, and the higher order objectives and policies in the NPS-HPL in relation to HPL. Further having a Discretionary Activity status does not work towards enabling the establishment of new REG in line with the proposed Energy Chapter, which can provide for new renewable electricity generation activities subject to certain tests.	Change the activity status of Rule REG-R7 from a Discretionary Activity to a Restricted Discretionary Activity.
Tekapo Landco Limited and Godwit Leisure Limited	P26.05	5.01	Interpretation	Definitions	Infrastructure	Oppose in Part	Consider whether the RMA definition suitably covers local infrastructure provided by developers. Seek inclusion of reference to stormwater management areas and stormwater drainage networks within the definition.	It is considered that definition should also capture stormwater networks. It is not clear whether the RMA definition suitably covers local infrastructure provided by developers as part of a subdivision at any scale.
Tekapo Landco Limited and Godwit Leisure Limited	P26.05	5.02	Interpretation	Definitions	Sensitive Areas	Oppose in Part	The submitter seeks to identify the mapping of the Lakeside Protection Areas.	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.
Tekapo Landco Limited and Godwit Leisure Limited	P26.05	5.03	Infrastructure	Introduction		Oppose in Part	The submitter supports the exclusion of earthworks rules for infrastructure activities as stated by “The provisions in the earthworks chapter do not apply to earthworks that form part of the activities managed in this chapter (unless specified within the rules in this chapter), but do apply to the construction of new roads and access tracks associated with any infrastructure”; however it is sought that this provision be made into a rule, and also referenced within the Earthworks Chapter.	The exclusion of earthworks for infrastructure is supported however the wording is included in the ‘Introduction’ part of the Chapter and it is considered that this should be made into a ‘Rule’ in order to have legal effect.
Nova Energy Limited	P26.06	6.01	Renewable Electricity Generation	Entire Chapter		Support	Supports the insertion of a new Renewable Electricity Generation Chapter as proposed, for the following reasons (without limitation): <ul style="list-style-type: none"> • It provides clear and explicit direction in relation to renewable energy. • It establishes a planning framework to assess the development of new renewable electricity generation activities. • It gives effect to the CRPS and the National Policy Statement on Renewable Electricity Generation. • It recognises the benefits of renewable energy and its contribution towards addressing the effects of climate change. 	Retain proposed chapter.
Nova Energy Limited	P26.06	6.02	Infrastructure	Entire Chapter		Support	Supports the insertion of a Infrastructure Chapter as proposed, for the following reasons (without limitation): <ul style="list-style-type: none"> • It acknowledges the importance of infrastructure to people and the community’s wellbeing. • It provides a planning framework to assess the development of 	Retain proposed chapter.

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							infrastructure. • It seeks management of effects relative to the sensitivity of the environment. • It protects important existing infrastructure from reverse sensitivity effects. • It gives effect to the CRPS and the National Policy Statement on Electricity Transmission.	
Nova Energy Limited	P26.06	6.03	Interpretation	Definitions	All	Support in Part	Retain additions, amendments and deletions as proposed, except where amended definitions are submitted on separately 6.04 - 6.06.	Retain as proposed except where amendments are proposed in additional submission points 6.04 - 6.06.
Nova Energy Limited	P26.06	6.04	Interpretation	Definitions	Investigation Activities	Support in Part	The proposed language limits who can undertake investigation activities and is not required within the definition.	Amend as follows: means the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators and includes the following structures and activities: a. erecting an anemometer mast;...
Nova Energy Limited	P26.06	6.05	Interpretation	Definitions	Transmission Line	Support in Part	This definition could also apply to the connection of transmission lines between electricity generation infrastructure and distribution networks, as well as the national grid. The additional wording is not required within the definition.	Amend as follows: a. means the facilities and structures used for, or associated with, the overhead or underground transmission of electricity in the national grid ; and b. includes transmission line support structures, telecommunication cables, and telecommunication devices to which paragraph a. applies; but c. does not include an electricity substation.
Nova Energy Limited	P26.06	6.06	Interpretation	Definitions	Regionally Significant Infrastructure	Support in Part	The additional language should be included to align the district plan definition with the definition used for ‘regionally significant infrastructure’ in the CRPS (see pg 243 in the definitions section). The inclusion of this additional language gives effect to the regional policy statement in accordance with section 75(3)(c) of the RMA.	Amend as follows: means: a. strategic land transport network and arterial roads b. telecommunication facilities c. national, regional and local renewable electricity generation activities of any scale d. the electricity transmission network...
Nova Energy Limited	P26.06	6.07	Mapping	Zoning and Overlays		Support	Supports the amendments of planning maps, zones and overlays as proposed.	Retain proposed changes.
Transpower New Zealand Limited	P26.07	7.01	Interpretation	General	Entire District Plan	Support in Plan	Generally supports the use of the term ‘national grid’, but seeks that, in all locations where the term is used, each word be capitalised to read ‘National Grid’. It is Transpower’s experience that the most District Plans use initial capital letters in the way. Such an approach is also consistent with the use of the term within Transpower.	Amend ‘national grid’ to be capitalised to read ‘National Grid’ in all places where the term is used in the Proposed Plan Changes.
Transpower New Zealand Limited	P26.07	7.02	Interpretation	Definitions	National Grid	Support	the definition is the same as the definition in the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.03	Interpretation	Definitions	National Grid Support Structure	Support	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	P26.07	7.04	Interpretation	Definitions	National Grid Yard	Support	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	P26.07	7.05	Interpretation	Definitions	Regionally Significant Infrastructure	Support	There may be some merit in the term ‘electricity transmission network’ being replaced with ‘National Grid’ because these are the same thing	Amend the definition of ‘regionally significant infrastructure’ as follows:

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							and using the term ‘National Grid’ is consistent with provisions elsewhere in the Proposed Plan Changes.	regionally significant infrastructure means: a. strategic land transport network and arterial roads b. telecommunication facilities c. the electricity transmission network National Grid d. wastewater collection, treatment and disposal networks...
Transpower New Zealand Limited	P26.07	7.06	Interpretation	Definitions	Sensitive Activity	Support	It is generally consistent with the definition included in the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.07	Interpretation	Definitions	Tower	Support	It is generally consistent with the definition included in the NESETA.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.08	Interpretation	Definitions	Transmission Line	Support	It is consistent with the definition included in the NESETA.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.09	Interpretation	Definitions	Upgrade	Support	The definition appropriately describes those activities that may be undertaken in respect of the National Grid.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.10	Infrastructure	Introduction		Support	Supports the ‘Introduction’, and in particular is supportive of the approach (and clear direction) that the provisions that relate to infrastructure are standalone, except where explicitly stated.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.11	Infrastructure	Objectives	INF-O1	Support	As it applies to the National Grid, the Objective seeks outcomes in respect of the development and maintenance of infrastructure that are generally consistent with the Matter of National Significance and Objective of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.12	Infrastructure	Objectives	INF-O2	Support	As it applies to the National Grid, the Objective is generally consistent with the approach to managing adverse effects of the National Grid set out in the NPSET, including by recognising differing sensitivities of different receiving environments and by acknowledging operation needs and functional needs of infrastructure.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.13	Infrastructure	Objectives	INF-O3	Support	The Objective gives effect to Policies 10 and 11 of the NPSET and Policies 5.2.2 and 16.3.4 of the CRPS.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.14	Infrastructure	Policies	INF-P1	Support	The Policy relates to the National Grid, the Policy gives effect to Policy 1 on the NPSET and Policies 5.2.2 and 16.3.4 of the CRPS.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.15	Infrastructure	Policies	INF-P2	Support	The Policy, to the extent it relates to the National Grid, gives effect to Policies 2 and 5 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.16	Infrastructure	Policies	INF-P4	Support in Part	Generally supports Policy INF-P4 but considers that the Policy may be interpreted as requiring effects to be minimised at the same time as regard is had to operational needs and functional needs. In the case of the National Grid, it is not always possible for adverse effects to be minimal. This is acknowledged in the preamble to the NPSET that states: “- These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant. - Technical, operational and security requirements associated with the transmission network can limit the extent to which it is feasible to avoid or mitigate all adverse environmental effects.” Transpower seeks that the Policy is amended to clearly express that operational needs and functional needs may limit the extent to which effects can be minimised.	Amend Policy INF-P4 as follows: Subject to the operational needs and functional needs of infrastructure, manage infrastructure, including ancillary earthworks, so that: 1. its form, location and scale minimises adverse effects on the environment; and 2. it is compatible with the values and anticipated character of the surrounding environment; while having regard to the operational needs and functional needs of the infrastructure.
Transpower New Zealand Limited	P26.07	7.17	Infrastructure	Policies	INF-P5	Support	The Policy generally reflects, and gives effect to, the direction for the management of the effects of the National Grid included in Policies 3, 4, 7 and 8 of the NPSET and Policy 16.3.4 of the CRPS. Further,	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
							Transpower acknowledges and supports the exclusion of the National Grid from clause (4) and considers that this approach appropriately reflects the explicit exclusion of the National Grid included in clause 1.3(3) of the NPSIB.	
Transpower New Zealand Limited	P26.07	7.18	Infrastructure	Policies	INF-P6	Support	Transpower supports Policy INF-P6 on the basis that the Policy appropriately reconciles the NPSHPL and the NPSET by providing a ‘pathway’ for specified infrastructure/regionally significant infrastructure.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.19	Infrastructure	Policies	INF-P7	Support in Part	It is understood that the Policy is not intended to apply to the National Grid, given the explicit exclusion of the National Grid included in clause 1.3(3) of the NPSIB. However, Transpower seeks amendments to the Policy to more clearly express this exclusion.	Amend Policy INF-P7 as follows: INF-P7 Infrastructure that is not the National Grid in Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna In addition to INF-P5, avoid new infrastructure that is not (excluding the national grid) that has adverse effects on the following, in an area of significant indigenous vegetation and significant habitats of indigenous fauna:”
Transpower New Zealand Limited	P26.07	7.20	Infrastructure	Policies	INF-P8	Support	The Policy gives effect to Policy 9 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.21	Infrastructure	Policies	INF-P9	Support	The Policy gives effects to Policies 10 and 11 of the NPSET and Policy 16.3.4 of the CRPS.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.22	Infrastructure	Rules	Notes for Plan Users	Support	Supports the ‘Notes for Plan Users’ and, in particular, supports the inclusion for reference to the need for activities to comply with NZECP34:2001 and the Electricity (Hazards from Trees) Regulations 2003. Further, Transpower supports the inclusion of reference to the NESETA prevailing over the provisions of the District Plan.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.23	Infrastructure	Rules	INF-R1	Support	Rule appropriately gives effect to Policy 2 of the NPSET and effectively implements Policy INF-P2.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.24	Infrastructure	Rules	INF-R2	Support	The Rule gives effect to Policies 2 and 5 of the NPSET; is generally consistent with the NESETA and appropriately implements Policy INF-P2.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.25	Infrastructure	Rules	INF-R4	Support	The Rule appropriately provides for infrastructure that might be necessary in the short term so that the benefits of infrastructure to the health, safety and wellbeing of people and communities are realised.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.26	Infrastructure	Rules	INF-R7	Support	The proposed permitted activity status appropriately responds to the anticipated minimal adverse effects of below ground infrastructure.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.27	Infrastructure	Rules	INF-R8	Support	The Rule provides an appropriate regulatory framework for the establishment of new National Grid assets in a manner consistent with the direction given by the NPSET and CRPS. Transpower particular supports the restricted discretionary activity status that is likely to apply to such assets, given the scale of the National Grid.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.28	Infrastructure	Rules	INF-R11	Support	The discretionary activity status is the most appropriate activity status for other infrastructure activities, having regard to the provisions of the NPSET (if Rule INF-R11 applies to the National Grid), CRPS and objectives and policies included in the Proposed Plan Change.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.29	Infrastructure	Rules	INF-R17	Support	Transpower supports Rule INF-R17 to the extent that the Rule regulates buildings accessory to sensitive activities in a manner that gives effect, in part, to Policies 10 and 11 of the NPSET and Policy 16.3.4 of the CRPS.	Retain as notified.

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Transpower New Zealand Limited	P26.07	7.30	Infrastructure	Rules	INF-R18	Support	The Rule appropriately provides for network utilities and infrastructure (including infrastructure that connects to the National Grid, as a permitted activity, subject to standards that give effect to Policy 10 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.31	Infrastructure	Rules	INF-R19	Support	The Rule regulates fences in a manner that gives effect, in part, to Policies 10 and is consistent with NZECP34:2001.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.32	Infrastructure	Rules	INF-R20	Support	The Rule appropriately provides for activities that will not compromise the National Grid in a manner that gives effect to Policy 10 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.33	Infrastructure	Rules	INF-R21	Support	The Rule appropriately provides for activities that will not compromise the National Grid in a manner that gives effect to Policy 10 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.34	Infrastructure	Rules	INF-R22	Support in Part	Generally supports Rule INF-R22, but considers that the Rule would benefit from refinement to also provide for artificial crop protection structures or crop support structures in the National Grid Yard provided that the structure is greater than 12 metres from National Grid support structures that are not pi-poles.	Amend Rule INF-R22 as follows: 1. The structure does not exceed 2.5m in height; and 2. The structure is located at least 8m from a national grid transmission line pi-pole and 12m from any other National Grid support structure ; and 3...
Transpower New Zealand Limited	P26.07	7.35	Infrastructure	Rules	INF-R23	Support	The Rule appropriately provides for activities that will not compromise the National Grid in a manner that gives effect to Policy 10 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.36	Infrastructure	Rules	INF-R24	Support	The Rule appropriately gives effect to Policy 11 of the NPSET and Policy 16.3.4 of the CRPS through non-complying activity status for new sensitive activities in the National Grid Yard.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.37	Infrastructure	Rules	INF-R25	Support	The Rule appropriately gives effect to Policy 10 of the NPSET and Policy 16.3.4 of the CRPS through non-complying activity status for some new agricultural and horticultural buildings in the National Grid Yard.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.38	Infrastructure	Rules	INF-R26	Support	The Rule appropriately gives effect to Policy 10 of the NPSET and Policy 16.3.4 of the CRPS through non-complying activity status for the handling and storage of hazardous substances in the National Grid Yard.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.39	Infrastructure	Rules	INF-R27	Support	Transpower supports ‘default’ Rule INF-R27 on the basis that the Rule appropriately gives effect to Policy 10 of the NPSET and Policy 16.3.4 of the CRPS through non-complying activity status for other activities in the National Grid Yard.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.40	Infrastructure	Standards	INF-S1	Support	Particularly supports the ‘default’ to restricted discretionary activity status where the standard is not met. Transpower considers the activity status is appropriate for infrastructure activities in sensitive areas because the effects of infrastructure are well understood, such that the consideration of potential effects can be confined.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.41	Infrastructure	Standards	INF-S2	Support	The Standard gives effect to Policy 9 of the NPSET; is consistent with the NESETA; and appropriately implements Policy INF-P8.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.42	Infrastructure	Standards	INF-S4	Support	The Standard appropriately manages activities that are permitted in the National Grid Yard in order ensure that the National Grid is not compromised in accordance with Policy 10 of the NPSET.	Retain as notified.
Transpower New Zealand Limited	P26.07	7.43	Infrastructure	Matters of Control or Discretion	REG-MD4	Support in Part	Generally supports REG-MD4, but seeks a limited amendment to clause (d), consistent with REG-MD3, to include reference to the electricity transmission network, alongside electricity distribution.	Amend the Matters of Control or Discretion in REG-MD4 as follows: d. The location of existing electricity generation, electricity

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								transmission and distribution infrastructure and the extent to which the proposal contributes to its efficient use.
Transpower New Zealand Limited	P26.07	7.44	Mapping	Overlays	National Grid	Support in Part	Generally supports the mapping of the National Grid, including distinguishing the voltage of the various transmission lines that traverse the District because mapping in this manner allows the related provisions to be easily understood. Transpower notes that Policy 12 of the NPSET requires the whole of the electricity transmission network to be identified on planning maps. In this instance, the planning maps do not identify all of the assets listed in this submission. Transpower therefore seeks that all National Grid assets are shown on the Planning Map.	Amend the Planning Map to show all National Grid assets (listed in the submission).
NZ Transport Agency Waka Kotahi	P26.08	8.01	Interpretation	Definitions	Pole	Support in Part	For clarity, NZTA suggests that signs, cameras and meteorological equipment are added to the infrastructure equipment that a pole can support.	Amend as follows: means a structure that supports infrastructure equipment including conductors, lines, cables, lights, or antennas, signs, cameras or meteorological equipment , but is not a tower, and includes foundations and hardware associated with the structure such as insulators, cross arms and guy-wires.
NZ Transport Agency Waka Kotahi	P26.08	8.02	Interpretation	Definitions	Regionally Significant Infrastructure	Support in Part	Definition follows the definition in the CRPS. However, clarification is sought whether ‘strategic land transport network’ includes the state highway network within the district. It is suggested that an additional definition is included for ‘strategic land transport networks’, which should include, among others, the state highway network.	Retain definition as notified and include additional definition for ‘strategic land transport network’.
NZ Transport Agency Waka Kotahi	P26.08	8.03	Interpretation	Definitions	Sensitive Activity	Support in Part	Supports the general intent of this definition. However, relief is sought to include hospitals, healthcare facilities and any elderly person housing or complex, as well as marae and places of worship in the list of sensitive activities. Hospitals, healthcare facilities and any elderly person housing or complex are included under the definition of ‘noise sensitive activities’ in the CRPS. Places of worship and maraes are generally susceptible to noise and should therefore also be included under this definition.	Amend as follows: means any: a. residential activity b. visitor accommodation c. community facility d. educational facility e. Hospitals, healthcare facilities and any elderly person housing or complex f. Marae and places of worship
NZ Transport Agency Waka Kotahi	P26.08	8.04	Interpretation	Definitions	Temporary Infrastructure	Support	This definition is supported	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.05	Interpretation	Definitions	Tower	Support in Part	Supports this definition, and for clarity, suggests that signs, cameras and meteorological equipment are added to the infrastructure equipment that a pole can support.	Amend as follows: means a lattice structure that supports conductors, lines, cables or antennas, signs, cameras or meteorological equipment . A tower includes foundations and hardware associated with the structure such as insulators, cross arms and guy-wires.
NZ Transport Agency Waka Kotahi	P26.08	8.06	Interpretation	Definitions	Upgrade	Oppose in Part	Seeks clarification whether this definition relates to infrastructure in general, or only to renewable electricity generation infrastructure. Supportive of the term ‘upgrade’ relating to infrastructure in general, as parts or sections of the state highway network are frequently upgraded, e.g., to meet a higher safety standard. NZTA therefore seeks an amendment to the definition to make it less ambiguous.	Amend as follows: in relation to infrastructure and renewable electricity generation activities and infrastructure , means activities undertaken to increase the capacity, operational efficiency, security or safety of existing infrastructure assets and activities.
NZ Transport Agency Waka Kotahi	P26.08	8.07	Infrastructure	Objectives	INF-O1	Support in Part	Supports the intent of this objective, and for clarity, a minor addition is suggested to ensure the integration of infrastructure with subdivision,	Amend as follows: Infrastructure is developed and maintained to meet the needs, and provide for the health, safety and wellbeing, of people and

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							use and development of land, rather than solely referring to ‘use and development’.	communities and is integrated with subdivision, use and development of land .
NZ Transport Agency Waka Kotahi	P26.08	8.08	Infrastructure	Objectives	INF-O2	Support	Supports this objective as it recognises the functional or operational needs of infrastructure.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.09	Infrastructure	Objectives	INF-O3	Support in Part	Supports the intent of this objective. However, an amendment is sought to bring the objective in line with NZTA’s functions under the Land Transport Management Act 2003 (i.e., undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest).	Amend as follows: The efficient, effective and safe operation, maintenance, upgrading and development of regionally significant infrastructure is not constrained or compromised by other activities.
NZ Transport Agency Waka Kotahi	P26.08	8.1	Infrastructure	Policies	INF-P1	Support	Supports this policy as it recognises the benefits of infrastructure on multiple levels throughout the district.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.11	Infrastructure	Policies	INF-P2	Support in Part	Supports the intent of this policy as it provides for the ongoing, efficient and effective operation and maintenance of the existing state highway network. However, clarification is sought on what constitutes a ‘minor upgrade’ and consequently, what would be beyond the scope of a ‘minor upgrade’ to existing infrastructure. While Rule INF-R2 provides some context in regard to some infrastructure, there is no clarity what a ‘minor upgrade’ to regionally significant infrastructure (or the state highway network and ancillary structures, in specific) would be.	NZTA requests clarification from Council on what constitutes a ‘minor upgrade’ and what is beyond the scope of a ‘minor upgrade’.
NZ Transport Agency Waka Kotahi	P26.08	8.12	Infrastructure	Policies	INF-P3	Support	Supports this policy.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.13	Infrastructure	Policies	INF-P4	Support is Part	While the general intent is supported, the requirement for form, location and scale of the infrastructure being such that adverse effects on the environment are minimised is opposed. The term ‘minimise’ is vague, and there may be instances when regionally significant infrastructure will be unable to minimise adverse effects, but the adverse effects which the infrastructure is causing can be remedied, mitigated or offset. It is NZTA’s preference to use generally understood terms also used in the RMA, such as avoiding, remedying or mitigating adverse effects.	Amend as follows: Manage infrastructure, including ancillary earthworks, so that: 1. its form, location and scale minimises avoids, remedies or mitigates of adverse effects on the environment; and 2. it is compatible with the values and anticipated character of the surrounding environment; while having regard to the operational needs and functional needs of the infrastructure.
NZ Transport Agency Waka Kotahi	P26.08	8.14	Infrastructure	Policies	INF-P5	Support in Part	Supports this policy as it enables infrastructure to be located in sensitive or significant areas if there is a functional or operational need for it to be located in that location. It then provides for the management of adverse effects, as well as off-setting or compensation, which is in line with the policy direction in higher-order planning documents such as the NPSFM and the NPSIB.	Amend as follows: Avoid locating infrastructure in identified sensitive areas (outside the road reserve) or within an area of significant indigenous vegetation or significant habitat of indigenous fauna, unless: ... 3. where there are more than minor adverse effects that cannot be avoided, remedied or mitigated, regard is had to any offsetting or compensation; and Following application of 1. - 3. above, there are no significant adverse effects remaining, (except that this clause shall not apply to the national grid and the state highway network).
NZ Transport Agency Waka Kotahi	P26.08	8.15	Infrastructure	Policies	INF-P6	Support	Supports this policy as it enables locating regionally significant infrastructure (which includes strategic land transport networks) to be	Retain as notified.

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							located within Highly Productive Land if there is a functional or operational need to locate in such areas.	
NZ Transport Agency Waka Kotahi	P26.08	8.16	Infrastructure	Policies	INF-P7	Support in Part	The overall intent of this policy is supported as it provides for lifeline utility infrastructure and regionally significant infrastructure to effectively operate and maintain their infrastructure in the event that the infrastructure has adverse effects on Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna. However, as per the submission on Policy INF-P5 above, NZTA seeks the inclusion of the state highway network under Clause 4 of Policy INF-P5 to ensure its functions under the Land Transport Management Act 2003 can be fulfilled. The relief sought requires a corresponding amendment under this policy.	Amend as follows: In addition to INF-P5, avoid new infrastructure (excluding the national grid and the state highway network) that has adverse effects on the following, in an area of significant indigenous vegetation and significant habitats of indigenous fauna: 1. loss of ecosystem representation and extent;...
NZ Transport Agency Waka Kotahi	P26.08	8.17	Infrastructure	Rules	INF-R1	Support	Supports the enabling nature of this rule as it provides for the effective, efficient and safe operation and maintenance (or removal) of existing infrastructure as a permitted activity.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.18	Infrastructure	Rules	INF-R2	Oppose in Part	The rule should provide for minor upgrades (see submission on definition of ‘minor upgrade’ above) of regionally significant infrastructure and the state highway network in specific. This could include to installation of guard rails or wire rope barriers, traffic signals, NZTA variable message signs or cameras etc. located outside of existing designations or within where they are not provided for by the designation.	Amend as follows: Where: 1. Where the above-ground structure is for minor upgrades or ancillary equipment directly associated with the state highway network. 2. The realignment, reconfiguration, relocation or replacement of a line, pipe, pole, tower, cross arms, switch, transformers, cabinet or accessory structure shall be within 5m of the existing alignment or location...
NZ Transport Agency Waka Kotahi	P26.08	8.19	Infrastructure	Rules	INF-R4	Support	Supports this rule.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.20	Infrastructure	Rules	INF-R5	Neutral	NZTA operates weather stations as part of the state highway network, providing information on wind speeds, rainfall, temperatures and more. NZTA supports the permitted activity pathway; however, reserves the opportunity to provide further submissions and/or evidence at a hearing in case this provision changes as a result of the submissions.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.21	Infrastructure	Rules	INF-R6	Support	NZTA is aware that more and more larger infrastructure buildings, structures or accessory buildings to infrastructure are built due to an influx of development as well as more isolated power generation throughout the district. Generally supports height and floor area restrictions for buildings and structures. NZTA considers that where a resource consent is needed for any infrastructure buildings, structures or accessory buildings to infrastructure, effects on state highway network should be an assessment matter if the infrastructure is located adjacent to, or in close proximity of, a state highway. NZTA envisages that this will include structures such as new solar farms, where panel orientation should generally be away from the road corridor, but also other infrastructure such as new switch yards or substations. Corresponding relief is sought under the matters of discretion in the submission.	Retain as notified.

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NZ Transport Agency Waka Kotahi	P26.08	8.22	Infrastructure	Rules	INF-R7	Oppose in Part	Supports the general intent of rule; however, opposes the reference to Standard EW-S4 as earthworks are dealt with separately under the plan. NZTA seeks deletion of the reference to Standard EW-S4.	Amend as follows: Where the activity complies with the following standards: INF-S1, EW-S4 ...
NZ Transport Agency Waka Kotahi	P26.08	8.23	Infrastructure	Rules	INF-R8	Support	Supports this rule.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.24	Infrastructure	Rules	INF-R11	Neutral	Generally supports the requirement for resource consent for infrastructure not specifically listed. 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.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.25	Infrastructure	Standards	INF-S1	Support	Supports this standard as it provides for infrastructure to be located within a legal road reserve within a sensitive area. Further, NZTA considers it appropriate for infrastructure located outside of a road reserve but within a sensitive area to go through a consenting process where the functional and operational needs of the infrastructure be located in that location need to be demonstrated.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.26	Infrastructure	Standards	INF-S3	Support	Supports this standard, noting that poles/towers associated with the state highway network (e.g., streetlights) are generally less than the heights specified in the standard.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.27	Infrastructure	Matters of Control or Discretion	INF-MD1	Oppose in Part	Generally agrees with the matters of discretion listed under INF-MD1. However, NZTA requests that effects of the infrastructure on the state highway network is included as a matter of discretion. This additional matter of discretion is required to ensure that NZTA will be able to provide effective, efficient, and safe management of the state highway network.	Add additional matter of discretion as follows: ... h. The actual and potential adverse effects of the infrastructure on adjacent or nearby state highway.
NZ Transport Agency Waka Kotahi	P26.08	8.28	Infrastructure	Matters of Control or Discretion	INF-MD2	Oppose	Generally supportive of managing reflectivity effects in certain areas or within specific overlays. However, NZTA requests that an additional matter of discretion is included to ensure that in regard to visual / reflectivity effects, transport safety is considered.	Add additional matter of discretion as follows: ... d. The actual and potential adverse effects of the building, structure or infrastructure on transport safety.
NZ Transport Agency Waka Kotahi	P26.08	8.29	Renewable Electricity Generation	Objectives	REG-O2	Support	Supports this objective requiring appropriate management of adverse effects of renewable electricity generation activities.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.30	Renewable Electricity Generation	Policies	REG-P4	Support	Supports this policy as it requires management of adverse effects relative to the sensitivity of the area in which they are located.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.31	Renewable Electricity Generation	Policies	REG-P5	Oppose in Part	Generally supports renewable electricity generation activities. However, an amendment to the policy is requested to ensure any new renewable electricity generation activity is located and designed in a way that minimises adverse effects on other, existing infrastructure, including transport networks.	Amend as follows: Provide for renewable electricity generation (not otherwise specified in REG-P4), while managing adverse effects by: 1. avoiding, remedying or mitigating significant adverse effects as far as practicable; 2. minimising other effects, including effects on existing infrastructure ; 3. having regard to any offsetting measures and environmental compensation proposed; and...
NZ Transport Agency Waka Kotahi	P26.08	8.32	Renewable Electricity Generation	Rules	REG-R6	Oppose in Part	Generally supports small-scale renewable electricity generation activities. However, any new activity should be located and oriented in a way that they do not adversely affect transport safety (e.g., from glare of solar panels). Corresponding matters of discretion are requested.	Amend as follows: Outside Areas Specified Below Activity Status: PER Where: 1. Any building or structure, or additions to an existing building

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								<p>or structure shall comply with height limit for the zone in which the activity is located.</p> <p><u>2. Any solar panel installed as part of the activity faces away from any adjacent state highway.</u></p> <p>Activity status when compliance is not achieved with R6.1: RDIS</p> <p>Matters of discretion are restricted to:</p> <p>a. The matters of discretion relating to height specified in the relevant zone chapter.</p> <p>b. The appropriateness of measures to avoid, remedy or mitigate adverse effects.</p> <p>c. Operational needs of the activity.</p> <p><u>d. Adverse effects on transport safety.</u></p> <p>Outstanding Natural Landscapes</p> <p>Activity Status: PER</p> <p>Where:</p> <p>1. Any building or structure, or additions to an existing building or structure, shall comply with NFL-S1 and NFL-S4.</p> <p><u>2. Any solar panel installed as part of the activity faces away from any adjacent state highway.</u></p> <p>Activity status when compliance is not achieved with R6.2: RDIS</p> <p>Matters of discretion are restricted to:</p> <p>a. The visual effects of the proposal on the values of ONF/ONL.</p> <p>b. The functional needs and operational needs of the activity.</p> <p><u>c. Adverse effects on transport safety.</u></p> <p>Scenic Viewing Areas, Scenic Grasslands, Lakeside Protection Areas</p> <p>Activity Status: PER</p> <p>Where:</p> <p>1. The activity is limited to additions to an existing building or structure.</p> <p><u>2. Any solar panel installed as part of the activity faces away from any adjacent state highway.</u></p> <p>Activity status when compliance is not achieved with R6.3: RDIS</p> <p>Matters of discretion are restricted to:</p> <p>1. REG-MD3 Specified Areas</p> <p><u>2. Adverse effects on transport safety.</u></p>
NZ Transport Agency Waka Kotahi	P26.08	8.33	Renewable Electricity Generation	Rules	REG-R7	Support in Part	Supports this rule, subject to Council adopting the requested changes to Matters of Discretion REG-MD4.	Retain as notified.
NZ Transport Agency Waka Kotahi	P26.08	8.34	Renewable Electricity Generation	Matter of Control or Discretion	REG-MD4	Oppose in Part	Generally supportive of managing adverse effects from new renewable electricity generation activities. However, NZTA requests that an additional matter of discretion is included to ensure that in regard to visual / reflectivity effects, transport safety is considered.	<p>Add additional matter of discretion as follows:</p> <p>...</p> <p><u>l. The actual and potential adverse effects of the renewable electricity generation activity on transport safety.</u></p>

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Simpson Family Holdings Ltd	P26.09	9.01	Renewable Electricity Generation	Introduction		Support	Support the intent to only apply the provisions in the listed chapters to Renewable Energy Generation Activities.	Retain as notified.
Simpson Family Holdings Ltd	P26.09	9.02	Renewable Electricity Generation	Objectives	REG-O1	Support in Part	There needs to be specific support in the objectives for new renewable electricity generation (REG) including recognising its functional and operations needs. REG-O1 could just mean increasing output from existing REG facilities.	Amend to include two new objectives as follows (or similar): <u>Recognise the functional and operational needs associated with the location and design of energy renewable electricity generation.</u> and <u>To provide for the development, operation, maintenance and upgrade of new and existing renewable electricity generation.</u>
Simpson Family Holdings Ltd	P26.09	9.03	Renewable Electricity Generation	Objectives	REG-O2	Support	Agree that the adverse effects of renewable electricity generation activities need to be managed.	Retain as notified.
Simpson Family Holdings Ltd	P26.09	9.04	Renewable Electricity Generation	Policies	REG-P1	Support in Part	Acknowledge that the wording reflects the wording of the NPS for REG. However, given the Government's drive to increase the amount of electricity generated by renewables and signing up to the world pact to tripled REG/ green energy, feels that the wording could be strengthened. The words 'recognise and provide for' are not particularly strong.	Amend as follows: Recognise and provide for the national, regional and local benefits of renewable electricity generation activities. <u>When considering proposals to develop and operate new and existing energy renewable electricity generation, have particular regard to the benefits to be obtained from the proposal.</u> including avoiding, reducing, or displacing greenhouse gas emissions.
Simpson Family Holdings Ltd	P26.09	9.05	Renewable Electricity Generation	Policies	REG-P4	Support	It is important to be able to investigate renewable electricity generation source.	Retain as notified.
Simpson Family Holdings Ltd	P26.09	9.06	Renewable Electricity Generation	Policies	REG-P6	Support in Part	<p>The direction of this policy does not significantly differ from that of REG-P5 which relates to REG activities outside areas identified in REG-P6: management of adverse effects, offsetting measures and environmental compensation, functional and operational needs. The only difference is the particular regard to be had to the 'location and efficient use of existing electricity generation, transmission and distribution infrastructure', which could be considered under REG-P6 1 or 2. As such, the need for two separate policies is questioned.</p> <p>Support the reference in condition 1 to operational need, which relates to having sufficient land area to be economical and grid connections. In conditions 2 and 3 the reference to 'practicable' should be changed to 'feasible' as the latter term includes economic considerations. Condition 4 should refer to residual 'significant' adverse effects as the RMA is no a 'no effects statute' and this will align with condition 5.</p>	<p>Amend as follows:</p> <p>Provide for renewable electricity generation activities (not otherwise specified in REG-P4) within areas of significant indigenous vegetation and significant habitats of indigenous fauna, Outstanding Natural Landscapes, Outstanding Natural Features, Sites and Areas of Significance to Māori, riparian areas, or within area of Highly Productive Land, where:</p> <ol style="list-style-type: none"> 1. there is a functional need or operational need for the activity to be in that location; 2. adverse effects on the values of the area are avoided as far as practicable <u>feasible</u>, including through site, route or method selection, design measures and other management methods; 3. adverse effects that cannot be avoided are remedied or mitigated, where practicable; 4. regard is had to any offsetting measures or environmental compensation, where there are <u>significant</u> residual adverse effects that cannot be avoided, remedied or mitigated; and 5. following application of 1. - 4. above, there are no more than minor residual significant adverse effects remaining. <p>Or combine Policies REG-P5 and P6.</p> <p>Or similar.</p>

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Simpson Family Holdings Ltd	P26.09	9.07	Renewable Electricity Generation	Rules	REG-R5	Support	It is important to be able to investigate renewable electricity generation sources.	Retain as notified.
Simpson Family Holdings Ltd	P26.09	9.08	Renewable Electricity Generation	Rules	REG-R6	Support	It is important to be able to provide for small-scale renewable electricity generation including for milking sheds and irrigators to support larger scale generation required for settlements.	Retain as notified.
Simpson Family Holdings Ltd	P26.09	9.09	Renewable Electricity Generation	Rules	REG-R7	Support in Part	<p>Acknowledge that the Mackenzie Basin is a 'special' area as it is an ONL.</p> <p>The introduction states that the provisions of the Landscape and Natural Character chapters do not apply to renewable electricity generation, but this rule imposes a different activity status on REG in an ONL.</p> <p>From experience, the majority of the land in the Basin is considered to be an area of significant indigenous vegetation or significant habitat of indigenous fauna as identified one the Canterbury Regional Policy criteria. Therefore, whilst the clearance of vegetation is proposed to be restricted discretionary under the Ecosystems and Indigenous Biodiversity section, the activity of establishing the renewable electricity facility would be a discretionary activity under this rule.</p> <p>The assessment matter that apply under REG-R6 address a broad range of matters and could be appropriately applied to all renewable energy generation, with some minor amendments to address highly productive land.</p> <p>As discussed above, there is also a government drive towards renewable electricity generation to manage climate change. Therefore, we consider Simpson Family Holdings Ltd consider that the development of new renewable electricity generation should be a restricted discretionary activity, recognising that this enables the Council to publicly notify or decline an application. It also aligns with the status of the proposed vegetation clearance rule.</p>	<p>Amend as follows:</p> <p>...</p> <p>Within an area of significant indigenous vegetation or significant habitat of indigenous fauna, Outstanding Natural Landscape, Outstanding Natural Feature, Sites and Areas of Significance to Māori , a setback distance specified in Table NATC1, or on Highly Productive Land.</p> <p>Activity Status: DIS</p> <p>Add an additional matter to Matters of Control or Discretion: REG-MD4 New Renewable Electricity Generation</p> <p>...</p> <p>l. Th ability of the land to be used for primary production.</p>
Simpson Family Holdings Ltd	P26.09	9.10	Section 19 Ecosystems and Indigenous Biodiversity	Rules	Rule 1.2.5	Support in Part	<p>It would appear that this rule does not override Rule 1.3.2 (clearance in areas of significant indigenous vegetation), which would make the clearance of indigenous vegetation associated with REG, a non-complying activity.</p> <p>This does not enable, or recognise and provide for REG as required under the NPS-REG.</p> <p>Amendments to the rules are required to ensure that the clearance of indigenous vegetation is a restricted discretionary not a non-complying activity.</p> <p>The NPSIB does not apply to REG but there is still a requirement under s6 of the RMA to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna. That said s6 would have been</p>	<p>Amend Rule 1.3.2 as follows:</p> <p>1.3.2 Any indigenous vegetation clearance in the following locations, unless specified as a permitted activity under Rule 1.1.1.1, 1.1.1.5 or 1.1.1.6 or a restricted discretionary activity under Rule 1.2.3:</p> <p>1. Within an area of significant indigenous vegetation or significant habitat of indigenous fauna.</p> <p>2. Above 900m in altitude.</p> <p>3. Within 75m of a lake, 20m of the bank of a river or 50m of any wetland.</p> <p>or amend Rule 1.2.5 as follows:</p> <p>Rule 1.2.5 The clearance of indigenous vegetation associated</p>

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							<p>taken into consideration when preparing the NPS-IB and it still excluded REG.</p> <p>Whilst the submitter does not consider you can argue REG has greater importance that indigenous biodiversity: the two should be addressed together, acknowledging the direction in the NPS-REG to:</p> <ul style="list-style-type: none"> - have particular regard to the need to locate the renewable electricity generation activity where the renewable energy resource is available, and - have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected, when considering <u>any</u> residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated. 	<p>with investigation activities, Small-scale Renewable Electricity Generation Activities or the construction and operation of any Renewable Electricity Generation Activities is a restricted discretionary activity.</p> <p>No other rules in this section apply to REG.</p> <p>Or similar.</p>
Environmental Defence Society Incorporated	P26.10	10.01	Infrastructure	Policies	INF-P5		Policy should include a cross-reference to INF-P7, as the requirements in INF-P7 applies in addition to those in INF-P5.	Include a cross-reference INF-P7.
Environmental Defence Society Incorporated	P26.10	10.02	Infrastructure	Policies	INF-P7	Support	Supports INF-P7 as it aligns with the policy direction in the NPSIB.	Retain as notified.
Environmental Defence Society Incorporated	P26.10	10.03	Infrastructure	Matters of Discretion or Control	INF-MD1		Seeks the inclusion of a specific Matter of Discretion relating to indigenous biodiversity.	Include an additional matter of discretion requiring consideration of the effects on indigenous biodiversity.
Environmental Defence Society Incorporated	P26.10	10.04	Renewable Electricity Generation	Policies	REG-P4		This policy does not provide sufficient protection for indigenous biodiversity.	Include environmental limits, for example those set out in INFP7(1) - (5), and require avoidance of adverse effects if limits cannot be achieved.
Environmental Defence Society Incorporated	P26.10	10.05	Renewable Electricity Generation	Policies	REG-P5	Oppose	Policy REG-P5 does not provide sufficient protection for indigenous biodiversity, and will not give effect to Council’s obligations under s 31(1)(b)(iii) or s 6(c) RMA. It also will not provide for the protection of outstanding natural landscapes in accordance with section 6(b) RMA. Further policy direction and limits are required to set out when renewable energy activities are not appropriate (for example because the indigenous biodiversity or landscape values lost are too great). Interaction between this policy and policy REG-P6 is not clear.	Include environmental limits for landscape and indigenous biodiversity in the policy (for example those set out in INFP7(1) - (5) for indigenous biodiversity), and require avoidance of adverse effects if limits cannot be achieved. Amend to make clear what the relationship between this policy and policy REG-P6 is.
Environmental Defence Society Incorporated	P26.10	10.06	Renewable Electricity Generation	Policies	REG-P6	Oppose	Policy REG-P6 does not provide sufficient protection for indigenous biodiversity and will not give effect to Council’s obligations under s 31(1)(b)(iii) or s 6(c) RMA. It also will not provide for the protection of outstanding natural landscapes in accordance with section 6(b) RMA. Further direction, and limits, are required to set out when renewable energy activities are not appropriate (for example because the indigenous biodiversity or landscape values lost are too great). Interaction between this policy and policy REG-P5 is not clear.	Include environmental limits for landscape and indigenous biodiversity in the policy (for example those set out in INFP7 (1) - (5) for indigenous biodiversity), and require avoidance of adverse effects if limits cannot be achieved. Amend to make clear what the relationship between this policy and policy REG-P5 is.
Environmental Defence Society Incorporated	P26.10	10.07	Renewable Electricity Generation	Matters of Discretion or Control	REG-MD4		Seeks the inclusion of a specific matter of discretion relating to indigenous biodiversity.	Include an additional matter of discretion requiring consideration of the effects on indigenous biodiversity.
Te Rūnanga o Ngāi Tahu	P26.12	12.01	Infrastructure	Introduction		Support in part	While the introduction does acknowledge the impacts that infrastructure can have on Mana whenua values the introduction does not include the SASM chapter as a chapter that applies to these	<p>Amend as follows:</p> <p>The provisions in other chapters in this District Plan do not apply to activities managed in this chapter, except as follows:</p> <ul style="list-style-type: none"> • Sites and Areas of Significance to Māori

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							provisions however the infrastructure refers to matters covered in the SASM chapter.	<ul style="list-style-type: none"> Natural Hazards Historical Heritage...
Te Rūnanga o Ngāi Tahu	P26.12	12.02	Infrastructure	Objectives	INF-O2	Support	The development of infrastructure needs to be sensitive to the nature of the environment it is being placed within.	Retain as notified.
Te Rūnanga o Ngāi Tahu	P26.12	12.03	Infrastructure	Policies	INF-P5, P6, P7	Support	These policies provide direction to managing effects of infrastructure on important areas and values.	Retain as notified.
Te Rūnanga o Ngāi Tahu	P26.12	12.04	Infrastructure	Rules	INF-R3	Oppose	<p>Kāi Tahu have a sacred and spiritual connection to the Opuha River as indicated within the SASM chapter. This rule allows up to a 25% increase in the overall footprint of the dam structure and associated buildings without considering the effects of this increase on SASM and the effects of this on Mana whenua values such as Mahika kai nor is this a consideration if the activity does not comply with the permitted rules.</p> <p>To provide adequate protection to Mahika kai and the values associated with the Opuha River but enable minor upgrades to occur as a permitted activity it is recommended that the overall footprint increase is no more than 10% and that the ability to consider effects on Mana whenua values is added as a matter of discretion for the RDIS. The preference is this is added to INF-MD1 rather than added to this rule as this concern is within a number of rules within this chapter. If the overall footprint percentage is not reduced, then removing the permitted status is required.</p>	<p>Activity Status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> The upgrading relates to machinery, buildings, plant, structures, facilities, works or components of the Opuha Dam. The upgrade does not increase the footprint of any machinery, buildings, plant, structures, facilities, works or components of the Opuha Dam by more than 25%10%. Any upgrade does not increase the overall maximum operating level of the lake. <p>Add an additional matter of discretion:</p> <p><u>1. Any potential or actual adverse effects of the proposal on fresh water and/or mana whenua values;</u></p> <p>2. Scale, Location and Design of Infrastructure Activity status when compliance is not achieved with R3.1 or R3.3: DIS</p> <p>Or alternatively:</p> <ol style="list-style-type: none"> Changing the status from Permitted to RDIS; and Add the matter of discretion above.
Te Rūnanga o Ngāi Tahu	P26.12	12.05	Infrastructure	Standards	INF-S1	Support	Kāi Tahu has ancestral connection to a number of areas within the district and these standards provide protection to those areas that are particularly sensitive such as silent files areas.	Retain as notified if any are moved from the relevant rules then the matters within these standards need to be included in the rules.
Te Rūnanga o Ngāi Tahu	P26.12	12.06	Infrastructure	Standards	INF-S3	Support	Kāi Tahu has ancestral connection to a number of areas within the district and these standards provide protection to those areas that are particularly sensitive such as silent files areas.	Retain as notified if any are moved from the relevant rules then the matters within these standards need to be included in the rules.
Te Rūnanga o Ngāi Tahu	P26.12	12.07	Infrastructure	Matters of Discretion or Control	INF-MD1	Support in Part	INF-MD1 is relevant to a number of rules that potentially have effects on Mana whenua values. Yet the effects of these activities on the values within the SASM Chapter cannot be considered. For example, within the Kāi Tahu takiwā, infrastructure located in such a way as to prevent access for Kāi Tahu Whānui access to Nohoaka Entitlements that have been provided under the NTCSA 1998.	<p>Add an additional matter of discretion:</p> <p>INF-MD1 Scale, Location and Design of Infrastructure ...</p> <p><u>h. The effects on the mana whenua values.</u></p>
Te Rūnanga o Ngāi Tahu	P26.12	12.08	Renewable Electricity Generation	Introduction		Support in Part	The landscape features within Te Manahuna (the Mackenzie District) are of cultural importance to Kāi Tahu whānui. The cultural values and culturally significant landscapes must be protected from further inappropriate development for future generations. Therefore, all provisions in PC24 Sites and Areas of Significance to Māori should apply to District-wide provisions relating to renewable electricity generation activities.	<p>Amend as follows:</p> <p>The provisions in other chapters of this District Plan do not apply to activities managed in this chapter, except as follows:</p> <ul style="list-style-type: none"> <u>Sites and Areas of Significance to Māori</u> Natural Hazards Historical Heritage...
Te Rūnanga o Ngāi Tahu	P26.12	12.09	Renewable Electricity Generation	Objectives and Policies	REG-O1-O4, REGP1-P4	Support	Te Rūnanga support the ability of future generations in the district to generate environmentally renewable energy.	Retain as notified.

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Te Rūnanga o Ngāi Tahu	P26.12	12.10	Renewable Electricity Generation	Rules	REG-R1-R4, REG-R6	Support	Te Rūnanga support the ability of future generations in the district to generate environmentally renewable energy while protecting the important values including Kāi Tahu values within the district.	Retain as notified provided changes to REG MD1-4 occur.
Te Rūnanga o Ngāi Tahu	P26.12	12.12	Renewable Electricity Generation	Rules	REG-R5	Oppose in Part	Te Rūnanga supports the ability of future generations in the district to generate environmentally renewable energy. Any renewable energy planning, projects and / or construction works should recognise the effects they can have on Kāi Tahu values.	Amend as below: Activity status when compliance is not achieved with R5.1 or R5.3: RDIS Matters of discretion are restricted to: a. Any potential or actual adverse effects of the proposal on mana whenua values; b. Any functional or operational reason for an extended timeframe. c. The appropriateness of measures to avoid, remedy or mitigate adverse effects. Activity status when compliance is not achieved with R5.2: RDIS a. Any potential or actual adverse effects of the proposal on mana whenua values. b. The location, design, scale and appearance of the building or structure...
Te Rūnanga o Ngāi Tahu	P26.12	12.13	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD1	Support in Part	Many of the locations of exiting Hydroelectric Power within the district are within SASM's and Statutory Acknowledgement areas. While the matters of control include impacts on indigenous fauna they do not include consideration of the effects of the activity on Kāi Tahu values that have been acknowledged within this plan and settlement.	Amend to include the proposed wording below: REG-MD1 Existing Hydroelectric Power a. Any potential or actual adverse effects of the proposal on mana whenua values. b. The nature of any visual effects of the building or structure on the skyline and open landscape...
Te Rūnanga o Ngāi Tahu	P26.12	12.14	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD2	Support	The matter enables the effects of the activity on SASM's to be considered.	Retain as notified.
Te Rūnanga o Ngāi Tahu	P26.12	12.15	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD3	Support	The matters of control and discretion enable the effects of the activity on Māori rock art, silent files and the other specified areas to be considered.	Retain as notified.
Te Rūnanga o Ngāi Tahu	P26.12	12.16	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD4	Support in Part	Te Rūnanga supports the ability of future generations in the district to generate environmentally renewable energy. However, any renewable energy planning, projects and / or construction works, and end of life impacts should recognise the effects they can have on Kāi Tahu values and their connection with their traditional places, lands, water etc.	Amend in part in accordance with the proposed wording below: REG-MD4 New Renewable Electricity Generation a. Any potential or actual adverse effects of the proposal on mana whenua values. b. The appropriateness of measures to avoid, remedy or mitigate adverse effects...
Te Rūnanga o Ngāi Tahu	P26.12	12.17	Renewable Electricity Generation	Policies and Rules	REG-P5 REG-P6 REG-R7	Oppose in Part	Te Rūnanga supports the ability of future generations in the district to generate environmentally renewable energy. However, any renewable energy planning, projects and / or construction works should recognise the effects they can have on unique values within a district. Kāi Tahu values and their connection with their traditional places, lands, water etc. Te Rūnanga is concerned that the plan provisions as they are currently worded do not appropriately manage all the effects of renewable energy on the unique features of the Mackenzie district particularly large-scale activities. While the NPS –Renewable energy requires local authorities enable	Amend the status of Rule REG -R7 from DIS to NC. Amend the policies to reflect the concerns raised in this submission point and support the NC activity status.

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							<p>renewable energy the NPS and the guidance material do indicate that is to the extent applicable to a region and that other obligations can be considered. This could mean that while enabling renewable energy in a district that there are some areas within the district where a certain size (e.g large scale verses small scale) and the type of renewable energy is not appropriate because of the uniquely important features of that particular site. These two policies appear to be the only provisions that manage the effects of new renewable activities within the district (the other policies relate to existing).</p> <p>For activities within the areas listed within REG P6 a stronger status of Non complying (NC) should apply to recognise the importance of these areas while in other parts of the district renewable energy is enabled. The provisions should also indicate in which locations an activity may not be suitable.</p>	
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.01	Renewable Electricity Generation	Introduction		Support with Amendment	The introduction lists the other parts of the plan that apply to activities addressed in this chapter. Notably the list includes the Ecosystems and Indigenous Biodiversity Chapter excluding Policies 2 and 3. The entire EIB chapter should apply to the REG Chapter as well as the NFL, NATC and open space and natural open space zone chapters. The REG provisions on their own are inadequate or would be contrary to achieving the outcomes of those chapters. The REG rules also include reference to requirements in Zone chapters contrary to limited chapter exceptions in the REG Introduction which do not include zone chapters.	Include the entirety of the EIB chapter in the list. Include the NFL and NATC Chapters in the list. Include the Zone Chapters in the list.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.02	Renewable Electricity Generation	Objectives	REG-O1	Support	The objective aligns with the NPSREG.	Retain as notified.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.03	Renewable Electricity Generation	Objectives	REG-O2	Oppose	It is not clear whether the approach to “manage” the adverse effects of REG activities would be consistent with s5 of the RMA. What “appropriately managed” means is not set out in the objectives and Forest & Bird has concerns with the REG policy direction.	The adverse effects of renewable electricity generation activities are appropriately managed to avoid, remedy or mitigate adverse effects on the environment.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.04	Renewable Electricity Generation	Policies	REG-P1	Support	The objective aligns with the NPSREG.	Retain as notified.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.05	Renewable Electricity Generation	Policies	REG-P4	Oppose	<p>The policy direction “managing adverse effects relative to the sensitivity of the area” is uncertain as to what is relative and sensitive. It also fails to consider cumulative effects or effects beyond where the activity is located. An activity that is “Small-scale” in terms of generation may not be small scale in terms of adverse effects.</p> <p>Policy F of the NPS-REG is for plans to include provisions to “provide for” small and community scale distributed renewable electricity generation to “the extent applicable to the region or district”. The Mackenzie district includes area of significant and outstanding values that are to be protected under the RMA s6 and that are unique to the region/district, in particular those found in the Mackenzie basin</p>	<p>Amend as follows: Enable Provide for the investigation and identification of renewable electricity generation sources and small-scale renewable electricity generation activities while managing adverse effects on the environment. relative to the sensitivity of the area in which they are located</p> <p>Add a new policy: Solar renewable energy generation in the Mackenzie Basin subzone: In recognition of the unique biodiversity and landscape, feature and character values of the Mackenzie Basin subzone.</p>

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							<p>subzone.</p> <p>Forest & Bird considers that the extent to those activities should be provided for should exclude solar (unless it is located on other lawfully established buildings or structures) and limit wind turbines, and that in other cases adverse effects should be managed by conditions on permitted rules so that effects are no more than minor or case by case RIDS or DIS activities.</p> <p>Forest & Bird also consider that wind farms should be restricted within the <u>Mackenzie Basin subzone</u> to small scale and community scale activities of no more than 2 turbines to protect the outstanding and significant values.</p>	<p><u>solar electricity generation is limited to that which can be placed on existing lawfully established buildings.</u></p> <p>Add a new policy: Wind turbines for renewable energy generation in the Mackenzie Basin subzone: <u>In recognition of the unique biodiversity and landscape, feature and character values of the Mackenzie Basin subzone, Wind electricity generation is limited to small and community scale activities.</u></p> <p>Add or amend rules so that: a) solar not in line with the new policy above is an RDIS activity. b) wind for small or community scale of no more than 2 turbines is RDIS. c) where a) or b) are not complied with the activity is NC. d) include effects on indigenous biodiversity, natural landscape, features and character, and on cultural values as matters for discretion for a) and b).</p>
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.06	Renewable Electricity Generation	Policies	REG-P5	Oppose	<p>This is not an appropriate effects management hierarchy. The policy should clearly step through the hierarchy requirements and be clear where there are limits, including when an activity may not be appropriate. In terms of considering adverse effects on indigenous biodiversity (or on freshwater) it is not clear why another hierarch beyond that set out in the EIB chapter provisions and in high order documents is used. The RPS Policy 9.3.6 sets limitations on the use of biodiversity offsets, the NPSIB and the NPSFM appendices set out limits on when biodiversity/aquatic offsetting and compensation are not appropriate. While policy direction recognising practical constraints associated with development and operation of renewable electricity generation activities could be appropriate this should not form a part of a effects management hierarchy or effects management policy.</p>	<p>Amend REG-R5 to refer to ECO chapter policies for managing adverse effects of renewable electricity generation activities on indigenous biodiversity.</p>
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.07	Renewable Electricity Generation	Policies	REG-P6	Oppose	<p>Both “functional need” and “operational need” are defined in the National Planning Standards 2019. Of particular relevance when considering activities within significant and outstanding areas is whether the activity has a functional need to justify locating there.</p> <p>Forest & Bird’s concerns with the effects management hierarchy approach in REG-P6 are similar as for REG-P5 above. There needs to be clear principles and criteria around applying any “biodiversity offsetting” and “biodiversity compensation”.</p> <p>Offsetting and Compensation should not be an either-or option but subsequently considered. It should be clarified whether provisions are intended to consider offsetting and compensation for effects beyond biodiversity and how a residual significant effect on those other matters would be determined if such measures are specifically included in the plan.</p>	<p>Amend as follows: Provide Only consider providing for renewable electricity generation activities (not otherwise specified in REG-P4) within areas of significant indigenous vegetation and significant habitats of indigenous fauna, Outstanding Natural Landscapes, Outstanding Natural Features, Sites and Areas of Significance to Māori, riparian areas, or within area of Highly Productive Land, where: 1A. adverse effects on indigenous biodiversity can be managed in accordance with the EIB objectives and policies; and 1. there is a functional need or and operational need for the activity to be in that location;...</p>

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							While Forest & Bird generally agree that that there should be “no significant adverse effects remaining” when considering indigenous biodiversity (or other s6 matters), it maybe that effects which are not “significant” are still inappropriate in the context of “protecting” those matters, in addition it may not be appropriate to offset or compensate for some significant adverse effects.	
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.08	Renewable Electricity Generation	Rules	REG-R1 REG-R2	Oppose	<p>There are no limits in the rules as to what “operation and maintenance” means or the scale of an “upgrade” includes under these rules. The rule should include PER standards where, for example, any vegetation clearance is limited to within 10m of existing lawfully established buildings or structures, and any vegetation clearance is limited to within 2m of existing fences and existing access tracks/roads.</p> <p>Include in REG-R2 PER standard that the upgrade does not include any indigenous vegetation clearance.</p> <p>Where these standards are not complied with effects on indigenous biodiversity, natural landscapes and features and natural character needs to be considered on a case-by-case basis through a resource consent process. Without these limitations and discretion there is no consideration or way to require adverse effects to avoided, remedies or mitigated, or where appropriate, to consider offsetting or compensation.</p>	<p>Include standards in REG-R1 and REG-R2 PER activities, for vegetation clearance to be limited to within 10m of existing lawfully established buildings or structures, and any vegetation clearance is limited to within 2m of existing fences and existing access tracks/roads.</p> <p>Include in REG-R2 PER a standard that the “upgrade” activities do not include any indigenous vegetation clearance above that set out above.</p> <p>For both rules, where PER compliance is not achieved the activity is RDIS or DIS to ensure discretion is provided for adverse effects on indigenous biodiversity, natural landscapes and features and natural character.</p>
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.09	Renewable Electricity Generation	Rules	REG-R3	Oppose	PER should be clarified so that 20m ² is the total additional amount of land, not 20m ² for each time there is a modification. This could mean incremental increases which could result in adverse effects not being appropriately managed and uncertainty for enforcement. REG-R3 CON. Seek for this rule classification to be RDIS with matters of discretion to consider adverse effects on indigenous biodiversity or for DIS.	<p>Amend as follows:</p> <p>Any modification or addition does not result in more than 20m² of additional land being utilised for buildings, structures and ancillary activities in total over the life of this plan, or the height of any existing building being increased by more than 2.5 metres.</p> <p>Where PER compliance is not achieved change the activity status to RDIS or DIS to ensure discretion is provided for adverse effects on indigenous biodiversity, natural landscapes and features and natural character.</p>
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.10	Renewable Electricity Generation	Rules	REG-R4	Oppose	It is not clear what renewable activities are included in this rule or what the potential effects could be. As it is written, wind or solar power could be added to an existing scheme. The activity status should at least be RDIS with matters of discretion to consider adverse effects on indigenous biodiversity.	Change activity status from CON to RDIS as a starting point. Where compliance is not achieved with RDIS standards then activity status should be NC.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.12	Renewable Electricity Generation	Rules	REG-R5	Oppose	<p>Having an activity in place for up to 60 months (5 years) is not temporary. An activity occurring for this length of time has the potential to have long lasting effects. Or to notify the council so they are aware of the activity and could check compliance. This should not be permitted in ONF or ONLs or in high natural character areas or SNAs.</p> <p>As written an activity that complies with REG-R5.2 has no limit on the duration of time the structure could be in place or the scale of any</p>	<p>Reduce the duration to 12 months at the PER level.</p> <p>Add a condition that there is no vegetation clearance.</p> <p>Amend REG-R5 so that all the PER standards apply, e.g. for zones.</p> <p>Where:</p> <ol style="list-style-type: none"> 1. The investigation, identification or assessment activity is located on site for no more than 60-12 months.; and 2. Any structure shall be set back from the road boundary, or

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							structure. Nor is there a limit on the number of structures. There is no requirement for removal of structures or for remediation. Similar concerns arise for REG-R5.3 and 4.	internal boundary of any site in separate ownership, the equivalent distance to the height of the structure.” Similarly for other areas.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.13	Renewable Electricity Generation	Rules	REG-R6	Oppose	<p>This rule definition is inconsistent with the definition use in the NPSREG. The limits are better set as standards or conditions. Even “small-scale” activities could still have adverse effects on the environment. This is particularly concerning for the Mackenzie basin subzone.</p> <p>The rule does not accord with s5 of the RMA which includes avoiding, remedying, or mitigating any adverse effects of activities on the environment. In addition, it is not clear whether adverse effects of access and ancillary activities are addressed within this rule.</p> <p>The rule limits/standards are inadequate. They do not manage adverse effects on the environment to an acceptable level. For example, there are no conditions managing the potential for adverse effects on indigenous biodiversity. Nor do the NFL standards provide adequate limits to protect unmodified locations.</p> <p>Requiring compliance with heigh limits in zone chapters is uncertain as those chapters are not listed as relevant provisions in the Introduction section above. For example, where an activity is RDIS, relying on the REG Introduction wording would mean the zone chapter policies could not be considered to guide decision making on heights.</p>	<p>Amend the definition for “small scale” to align with that used in the NPSREG.</p> <p>Add the requirements from the proposed definition as standards within REG-R6: <u>Where:</u> 1A. the activity generates electricity for use on a site and is ancillary to the principal use of the site, and may include: a. supply of up to 20 other sites; and / or b. distribution of any surplus electricity generated into to the electricity distribution network; and 1. Any building... 2. the activity is located within 100m of existing buildings and structures on the site and is able to use existing access without the need to clear vegetation to create new access; 3. an activity is located within the Mackenzie basin subzone: a. solar electricity generation is limited to that which can be placed on existing lawfully established buildings; and b. the activity does not include the placement on wind turbines. Where 3.a. is not met the activity is NC. Where 3. b. is not met the activity is RDIS and for Wind electricity generation and is limited to no more than 2 turbines. Matters for discretion include effects on indigenous biodiversity and the ONL. Where the RDIS rule in not me the activity is NC </p>
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.14	Renewable Electricity Generation	Rules	REG-R7		It is not clear what the renewable activities would be, the location or the scale or the potential effects could be. Considering the lack of certainty, the activity status for “Any Renewable Electricity Generation Activities Not Otherwise Listed” should at least be DIS. Within specified areas, the activity status should be non-complying.	Amend Outside Areas Specified Below to DIS. Amend within specified areas to NC.
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.15	Infrastructure	Entire Chapter		Oppose in Part	Forest & Bird has similar concerns with the wording and approach in the INF chapter that would override the objective and policies of the EIB chapter and that the scope of permitted and controlled activities is inappropriate to protect significant and outstanding natural areas and the need for appropriate discretion in RDIS rules for effects on ecological, natural landscape, features, and character.	Amend the INF chapter to address concerns, including that the EIB chapter applies with respect to effects on indigenous biodiversity.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.01	Infrastructure	Objectives	INF-O1	Support	Supports INF-O1 and acknowledges that educational facilities, should only be established where the health, safety and wellbeing, of people and communities can be integrated and do not result in risk to subdivision, use and development.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.02	Infrastructure	Objectives	INF-O2	Support	Supports INF-O2 and acknowledges that educational facilities, should only be established where there is an operational need for them to be located.	Retain as notified.

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Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.03	Infrastructure	Policies	INF-P1	Support	Supports INF-P1 and acknowledges that infrastructure for the purpose of educational facilities are beneficial to the economic, social, cultural and environmental wellbeing, and health and safety, of people and communities as they allow the district to function.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.04	Infrastructure	Policies	INF-P2	Support	Supports INF-P2 as a policy and acknowledges that educational facilities, should enable the operation, maintenance, replacement, reconstruction, and minor upgrades to, existing infrastructure.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.05	Infrastructure	Policies	INF-P3	Support	Supports INF-P2 and acknowledges that educational facilities, should be integrated with land use, subdivision, development and urban growth.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.06	Infrastructure	Policies	INF-P4	Support	Supports INF-P4 as a policy and acknowledges that educational facilities, should be compatible with the values and anticipated character of the surrounding environment, ensuring that there is an operational need for educational facilities.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.07	Infrastructure	Policies	INF-P5	Support	Supports INF-P5 and acknowledges that educational facilities, should be compatible with sensitive and significant areas, ensuring that there is an operational need for educational facilities.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.08	Infrastructure	Policies	INF-P6	Support	Supports INF-P6 and acknowledges that highly productive land should be avoided for infrastructure, unless that there is an operational need for educational facilities be located on the highly productive land.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.09	Infrastructure	Policies	INF-P7	Support	Supports INF-P6 and acknowledges that significant indigenous vegetation and significant habitats of indigenous fauna should be avoided for infrastructure, unless that there is an operational need for educational facilities be located on the highly productive land.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.10	Infrastructure	Policies	INF-P9	Support	Supports INF-P9 and acknowledges that sensitive activities should be avoided within the national grid yard to ensure that there is a safe, effective and efficient operation, maintenance, upgrading and development of the national grid yard.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.11	Infrastructure	Rules	INF-R24	Support	Acknowledges rule INF-R24 and that sensitive activities, which include educational facilities, should not be located in close proximity to the national grid yard.	Retain as notified.
Ministry of Education Te Tahuu o Te Maturanga	P26.14	14.12	Infrastructure	Rules	INF-R30	Support	Supports rule INF-R30 to manage sensitive activities. It is acknowledged that the Ministry may have an operational need to locate their assets within in an Electricity Distribution Corridor. Supports the activity status of Restricted Discretionary for this zone to ensure that the consideration of effects is appropriately limited to matters of discretion.	Retain as notified.
Genesis Energy Limited	P26.15	15.01	Interpretation	Definitions	New Definition - Minimise	New	The term “minimise” is used in INF-P4 and INF-P6 but is not defined in the plan change. Genesis seeks adoption of a new definition set out in the relief sought.	Insert new definition as follows: Minimise means: to reduce to the smallest amount reasonably practicable.
Genesis Energy Limited	P26.15	15.02	Interpretation	Definitions	Earthworks	Support	The definition of “earthworks” from the National Planning Standards is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.03	Interpretation	Definitions	Functional Need	Support	The use of the National Planning Standard definition for “functional need” is appropriate and supported.	Retain as notified.

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Genesis Energy Limited	P26.15	15.04	Interpretation	Definitions	Infrastructure	Support in Part	Infrastructure is included in the list of definitions associated with PC26, however is not marked as being subject to a plan change. “Infrastructure” is defined as having the same meaning as in section 2 of the RMA which includes “facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity”. While it is appropriate that the RMA definition of infrastructure forms the basis of the definition, the definition should be extended to include energy storage systems, recognising the role that such systems are likely to play in future electricity systems.	Amend the definition of “infrastructure” as follows: Has the same meaning as in section 2 of the RMA, with an added reference to energy storage. (as set out below) Means — ... (d) facilities for the generation of electricity, energy storage. lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person— ... Alternatively, if the definition of Infrastructure is not amended, then all provisions in all of PC23, PC24, PC25, PC26 and PC27 that refer to “Infrastructure” should be amended to refer to “Infrastructure and energy storage facilities ”.
Genesis Energy Limited	P26.15	15.05	Interpretation	Definitions	Investigation Activities	Support	The definition of “investigation activities” is appropriate and supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.06	Interpretation	Definitions	Lifeline Utility Infrastructure	Support	The use of the Civil Defence Emergency Management Act 2002 definition of “lifeline utility infrastructure” is appropriate and supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.07	Interpretation	Definitions	Operational need	Support	The use of the National Planning Standards definition of “operational need” is appropriate and supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.08	Interpretation	Definitions	Pole	Support	The definition of “pole” is considered appropriate and is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.09	Interpretation	Definitions	Small-Scale Renewable Electricity Generation Activity	Support	The definition of “small-scale renewable electricity generation” activity is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.10	Interpretation	Definitions	Upgrade	Support	The definition of “upgrade” is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.11	Renewable Electricity Generation	Introduction	Paragraphs 1 - 4	Oppose	<p>The introduction needs to better capture the national significance of renewable electricity generation activities as is recognised not only in the NPS-REG, but also the NPS-FM and the NPS-IB. Together these national policy statements establish a framework to specifically provide for an manage the effects of renewable electricity generation activities which needs to be better prefaced in the introduction to this chapter.</p> <p>The introduction to the REG chapter also needs to provide greater emphasis on the importance of addressing the effects of climate change and the profound risk it poses to achieving the sustainable management of natural and physical resources in New Zealand, including in the Mackenzie District.</p> <p>The CRPS further outlines the importance of renewable electricity generation activities, particularly through Objective 16.2.2 to promote a diverse and secure supply of energy, and Policies 16.3.3 and 16.3.5</p>	<p>Amend the Introduction as follows: This Chapter contains District-wide provisions relating to renewable electricity generation activities.</p> <p>Energy efficiency and the use and development of renewable energy are matters the District Plan must have particular regard to under section 7 of the Act. The District Plan must also give effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG), which requires recognition of the national significance of renewable electricity generation.</p> <p>The global climate has changed because of greenhouse gas emissions from human activities, and it will continue to do so in the absence of fast and bold interventions. The effects of human-caused climate change are broad and far-reaching. It is a global issue that affects the physical environment,</p>

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							recognising the benefits of renewable energy generation facilities, and the importance of providing for efficient, reliable and resilient electricity generation within the region.	<p><u>ecosystems, and human societies. New Zealand is already experiencing increased frequency and intensity of extreme events such as higher temperatures, flooding, droughts and wildfires, increased sea-level rise, and warmer and more acidic oceans. Climate change poses a profound risk to achieving sustainable management of natural and physical resources in New Zealand, including in the Mackenzie District.</u></p> <p><u>Key to mitigating climate change is rapid decarbonisation of the economy and its energy systems through renewable electricity generation. The Mackenzie District is synonymous with renewable electricity generation activities, such as the nationally significant Waitaki Power Scheme. The national significance of renewable electricity generation is also recognised in the National Policy Statement for Freshwater Management 2020 and the National Policy Statement for Indigenous Biodiversity 2023. Together these national policy statements establish a framework to specifically provide for and manage the potential effects of renewable electricity generation activities that differs from the framework applied to other activities under the Act.</u></p> <p><u>The District Plan must give effect to national policy statements.</u></p> <p>There are significant renewable energy resources located within the District. Part of the nationally significant Waitaki Power Scheme, which is the largest hydro-electric power scheme in New Zealand, is located within the District. The District also contains the Opuha Hydro-electric Power Scheme. There is also increasing interest in solar power generation in the District, due to the high amount of irradiance, particularly in Te Manahuna / the Mackenzie Basin. At a domestic scale, there are renewable electricity options such as solar water heating and solar panels.</p> <p>The NPS-REG directs that the development, operation, maintenance and upgrading of both new and existing renewable electricity generation activities is provided for, in order to increase the proportion of electricity generated from renewable energy sources. These activities often have a functional need or operational need to be in a particular location, but can have adverse effects on the environment, particularly in areas which have important natural values or mana whenua values. This chapter provides direction on how renewable electricity generation activities are to be provided for, while appropriately managing the potential adverse effects of these activities.</p>

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Genesis Energy Limited	P26.15	15.12	Renewable Electricity Generation	Introduction	Paragraph 5	Oppose	<p>Genesis considers that paragraph 5 of the introduction is not sufficiently clear. The notified version of Paragraph 5 reads “The provisions in other chapters of this District Plan do not apply to activities managed in this chapter, except as follows:” and then lists topics, but not specific provisions. This leaves it unclear what specific provisions do and do not apply to REG activities.</p> <p>With regard to Ecosystems and Indigenous Biodiversity provisions, Genesis understands that for ‘renewable energy generation and transmission’ activities, a consent memorandum has been signed by all parties to appeals on such provisions in MDC’s decisions version of PC18. This consent memorandum leads to the following PC18 provisions applying to the WPS and the Opuha Scheme: Objective, Policies 1, 4, 5, 7 and 8, Rules 2.1.1 and 2.2.1.</p> <p>Contrary to the notified version of the PC26 Renewable Electricity Generation chapter, Genesis considers that Policy 6 of PC18 does not apply to the WPS or the Opuha Scheme since it addresses farming activities and not REG activities. Further, while the title of Rule 1 of PC18 states that the rule does not apply to the WPS and the Opuha Scheme, Genesis considers that the PC26 Renewable Electricity Generation chapter should be explicit that Rules 1.1.1, 1.2.2, 1.3.1 and 1.3.2 of PC18 do not apply to the schemes.</p> <p>With regard to activities on waterbodies, PC19 to the Mackenzie District Plan (MDP) addressed these provisions and they are now operative. For this reason, the specific provisions that apply to REG activities can be readily listed in the REG Chapter.</p> <p>With regard to provisions addressing light, Plan Change 22 to the MDP addressed these provisions and they are now operative. For this reason, the specific provisions that apply to REG activities can be readily listed in the REG Chapter.</p> <p>Genesis understands that provisions addressing Natural Hazards, Historical Heritage, Notable Trees, Noise and Signs are part of Stage 4 of the review of the MDP, and that Stage 4 provisions are scheduled for public notification in November 2024.</p> <p>In the interim, Genesis considers that the current relevant provisions should be listed in the REG Chapter, and the list of provisions that apply to REG activities should be updated through the 2024 plan changes.</p> <p>Genesis has listed, in its ‘relief sought’, the provisions that it considers apply to REG at this stage in the MDP review process. With respect to noise, Genesis considers that there are no specific existing provisions that can be listed. Genesis considers that Rural Objective 6 and Rural Policy 6D are too general in their references to ‘amenity values’ (which can be affected by emissions of noise) to be added to the list. For this reason, Genesis has not listed noise provisions that apply to REG at</p>	<p>Amend paragraph 5 of the Introduction as follows: The provisions in other chapters of this District Plan do not apply to activities managed in this chapter, except as follows:</p> <ul style="list-style-type: none"> •Natural Hazards •Historical Heritage •Notable Trees •Ecosystems and Indigenous Biodiversity, but excluding Policies 2 and 3: •Activities on the Surface of Water •Light •Noise •Signs <p>The provisions in the earthworks chapter do not apply to earthworks that form part of the activities managed in this chapter (unless specified within the rules in this chapter), but do apply to the construction of new roads and access tracks associated with any infrastructure: Concerning the Ecosystems and Indigenous Biodiversity Chapter, the following provisions apply to the Waitaki Power Scheme and the Opuha Scheme: Objective, Policies 1, 4, 5, 7 and 8 Rules 2.1.1 and 2.2.1 Concerning activities on waterbodies: a) the following provisions apply to the Waitaki Power Scheme: Rural Objective 8 Rural Policies 8A, 8B, 8F Rural Rules 7A.1.1.d, 7A.1.2.b, 7A.2.1.d b) the following provisions apply to renewable electricity generation activities other than the Waitaki Power Scheme: Rural Objective 8 Rural Policies 8A, 8B Rural Rules 7A.1.1.a, 7A.1.1.b, 7A.1.2.b, 7A.2.1.a, 7A.2.1.b, 7A.2.1.c, 7A.2.2.a, 7A.2.2.b, 7A.2.3.b, 7A.3.1.a, 7A.3.1.b, 7A.3.3.a, 7A.3.4.b, 7A.4.1.a, 7A.4.1.b, 7A.4.2.a, 7A.4.3.b, 7A.4.4.b Concerning General District-Wide Matters Light, the following provisions apply to renewable electricity generation activities: Light-O1, Light-P1, Light-P2, Light-R1, Light-R2, Light-R3, Light-R4 Concerning signs, the following provisions of Section 12 – Signs and Aerial Distractions Assessment Matters apply to renewable electricity generation activities: Objective 1 Policies 1A, 1B, 1C Rules 1.a, 1.b, 1.c, 1.d, 1.e, 1.f, 1.g, 2.a, 2.d, 2.e, 2.f, 3.a, 3.b, 3.c, 7.e. Concerning historic heritage and notable trees, the following provisions in Section 11 - Heritage Protection apply to</p>

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							<p>this point.</p> <p>It is appropriate that the provisions in other chapters of the District Plan do not apply to REG activities managed under the REG chapter with the exception of those identified as notified. In particular, the exception of Policies 2 and 3 in the Ecosystems and Indigenous Biodiversity chapter from the matters identified in other chapters that apply within the REG chapter is supported given the recognised national significance of renewable energy generation activities. Further to the exclusion of policies 2 and 3, renewable electricity generation activities captured by Rule 1 of the Indigenous Biodiversity chapter should also be excluded, on the basis that any indigenous vegetation clearance associated with the Waitaki Power Scheme, the national grid or the Opuha Scheme are covered by Rule 2, and the effects of indigenous vegetation clearance associated with the construction of any new renewable electricity generation activities.</p>	<p><u>renewable electricity generation activities.</u></p> <p><u>Objective 1</u></p> <p><u>Policies 1D</u></p> <p><u>Rules 1.a, 2.a, 2.b, 3.a, 4.a, 4.b, 5, 6.a.</u></p> <p><u>Concerning natural hazards, the following provisions apply to renewable electricity generation activities.</u></p> <p><u>a) ATC-O5; and</u></p> <p><u>b) Section 18 – Natural Hazards Objective 1 and Policies 4, 5 and 6.</u></p> <p><u>Concerning noise:</u></p> <p><u>Rule 15.1.1h of the Section 7 – General Rural Zone Rules.</u></p>
Genesis Energy Limited	P26.15	15.13	Renewable Electricity Generation	Introduction	Paragraph 6	Oppose	The construction of new roads or access tracks are a fundamental component to the development of renewable electricity generation activities which cannot be developed operated or maintained without the appropriate provision for vehicular access. The proposed exclusion of these activities from the REG chapter is not supported and due consideration of the effects of roading and access related earthworks is better captured by matters of discretion for REG activities.	Delete the sixth paragraph of the Introduction to the REG chapter, as follows: <u>The provisions in the earthworks chapter do not apply to earthworks which form part of the activities managed in this chapter, except for the construction of new roads or access tracks.</u>
Genesis Energy Limited	P26.15	15.14	Renewable Electricity Generation	Objectives	REG-O1	Support	Objective REG-O1 is supported as the maintenance or increase of output from electricity generation activities in the District for national, regional and local use is appropriate.	Retain as notified.
Genesis Energy Limited	P26.15	15.15	Renewable Electricity Generation	Objectives	REG-O2	Oppose in Part	The need to manage potential adverse effects that can result from activities is generally supported, however, Genesis consider that the Objective as drafted does not adequately reflect the national direction set in the NPS-REG and should more clearly recognise the national significance of REG activities.	Amend Objective REG-O2 as follows: The adverse effects of renewable electricity generation activities are appropriately managed <u>while recognising the national significance of renewable electricity generation activities and giving particular regard to the functional or operational needs of such activities.</u>
Genesis Energy Limited	P26.15	15.16	Renewable Electricity Generation	Objectives	REG-O3	N/A	Genesis understands that REG-O3 is not within the scope of PC26.	N/A
Genesis Energy Limited	P26.15	15.17	Renewable Electricity Generation	Policies	REG-P1	Support in Part	The intent of Policy REG-P1 is generally supported as the recognition of the benefits of renewable electricity generation activities is appropriate. This policy should however be amended to specifically acknowledge both existing and new renewable electricity generation assets as well as activities for clarity.	Amend Policy REG-P1 as follows: Recognise and provide for the national, regional, and local benefits of <u>existing and new</u> renewable electricity generation <u>assets and</u> activities, including avoiding, reducing, or displacing greenhouse gas emissions.
Genesis Energy Limited	P26.15	15.18	Renewable Electricity Generation	Policies	REG-P2	N/A	Genesis understands that REG-P2 is not within the scope of PC 26.	N/A
Genesis Energy Limited	P26.15	15.19	Renewable Electricity Generation	Policies	REG-P3	N/A	Genesis understands that REG-P3 is not within the scope of PC 26.	N/A
Genesis Energy Limited	P26.15	15.20	Renewable Electricity Generation	Policies	New Policy		Renewable electricity generation activities within the existing footprint and core sites of the Waitaki Power Scheme need to be specifically enabled. REG-P2 provides for REG activities in a manner that, as far as	Insert new policy as follows: REG-PX – Waitaki Power Scheme

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							practicable, avoids, remedies, or mitigates significant adverse effects on the ONL and features of the Mackenzie Basin, however the REG activities associated with the WPS need to be specifically enabled in a new policy.	<u>Enable the operation, maintenance and upgrade of the Waitaki Power Scheme.</u>
Genesis Energy Limited	P26.15	15.21	Renewable Electricity Generation	Policies	REG-P4	Oppose in Part	<p>While Genesis supports enablement of the investigation and identification of renewable electricity generation sources as well as small-scale activities, Genesis considers that the phrase “relative to the sensitivity of the area in which they are located” is not clear enough to be consistently applied in decision making and is not consistent with the NPS-REG.</p> <p>Further to this, the “sensitivity of the area” is reflected in the introduction to the Renewable Electricity Generation chapter which identifies other provisions in the MDP that apply to renewable electricity generation activities in addition to the provisions in PC26. For these reasons, Genesis considers that the phrase “relative to the sensitivity of the area in which they are located” is not necessary in Policy REG-P4.</p>	Amend REG-P4 as follows: Enable investigation and identification of renewable electricity generation sources and small-scale renewable electricity generation activities while managing adverse effects relative to the sensitivity of the area in which they are located.
Genesis Energy Limited	P26.15	15.22	Renewable Electricity Generation	Policies	REG-P5	Oppose	<p>Opposes policy REG-P5 on the basis that it is inconsistent with Policies C1 and C2 of the NPS-REG. The meaning of the phrase “minimising other effects”, is unclear, and Policy C2 leads to offsetting and compensation only being had regard to when considering residual adverse effects after avoiding, remedying or mitigating adverse effects.</p> <p>With respect to point 4 of Policy REG-P5, the definition of “functional needs” in PC26 reads “means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment” which is narrower than the direction in Policy C1(a) of the NPS-REG, which directs decision makers to have particular regard to “the need to locate the renewable electricity generation activity where the renewable energy resource is available”. Genesis’ concern with the inclusion of “functional needs” in Policy REG-P5 is that it is overly restrictive of REG activities in areas not identified in Policy REG-P6 as being more sensitive to the potential effects of REG activities. Genesis therefore seek relief that is consistent with the direction of Policy C1 of the NPS-REG.</p> <p>Further to this, Policy REG-P5 should also specifically exclude the activities addressed in REG-P2, REG-P3, the proposed new policy REG-PX sought earlier in this submission, as well as REG-P4 activities. Genesis also considers that REG-P5 should be enabling the activities listed in the policy as they are not in areas of significant indigenous vegetation and significant habitats of indigenous fauna, ONLs, ONFs, riparian areas and SASM or on highly productive land (because such activities are addressed in REG-P6), and accordingly the conditions of a permitted or controlled activity rule can be readily applied to manage potential adverse effects without the need to apply discretion to the granting of a consent (or otherwise).</p>	<p>Amend REG-P5 as follows: Provide for Enable renewable electricity generation (not otherwise specified enabled or provided for in REG-P2, REG-P3, REG-PX and REG-P4), while managing adverse effects by:</p> <ol style="list-style-type: none"> 1. avoiding, remedying or mitigating significant adverse effects as far as practicable; and 2. minimising other effects; 3. where residual significant adverse effects remain, having regard to any proposed offsetting measures and/or environmental compensation measures proposed; and 4. Having particular regard to the practical constraints associated with renewable electricity generation activities, including: <ol style="list-style-type: none"> a. Functional needs and Operational needs of renewable electricity generation activities; b. The need to locate the renewable electricity generation activity where the renewable energy resource is available; and c. Location and efficient use of existing electricity generation, transmission and distribution infrastructure.

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Genesis Energy Limited	P26.15	15.23	Renewable Electricity Generation	Policies	REG-P6	Oppose	Considers that Policy REG-P6 should specifically exclude the activities addressed in REG-P2, REG-P3, the proposed new policy REG-PX sought in submission point 17, as well as REG-P4 activities. Furthermore, condition 4 needs to be amended to be specific to offsetting and compensation measures that are proposed by the generator. Condition 5 is considered to be inconsistent with national direction which does not require this approach at this point in time. For example the National Policy Statement for Indigenous Biodiversity does not apply to REG assets and activities, while there is direction in the NPS-REG to increase REG in New Zealand. Genesis therefore consider that a consenting pathway should exist for REG activities that allows the merits or otherwise of a proposed activity to be considered on a case by case basis under the national policy direction at the time.	Amend Policy REG-P6 as follows: REG-P6 – Other Renewable Electricity Generation Activities – Within areas of significant indigenous vegetation and significant habitats of indigenous fauna, ONLs, ONFs, riparian areas and SASM or on highly productive land Provide for renewable electricity generation activities (not otherwise specified enabled or provided for in REG-P2, REG-P3, REG-PX and REG-P4) within areas of significant indigenous vegetation and significant habitats of indigenous fauna, Outstanding Natural Landscapes, Outstanding Natural Features, Sites and Areas of Significance to Māori, riparian areas, or within area of Highly Productive Land, where: 1. there is a functional need or operational need for the activity to be in that location; 2. adverse effects on the values of the area are avoided as far as practicable, including through site, route or method selection, design measures and other management methods; 3. adverse effects that cannot be avoided are remedied or mitigated, where practicable; and 4. regard is had to any proposed offsetting measures or environmental compensation, where there are significant residual adverse effects that cannot be avoided, remedied or mitigated.; and 5. following application of 1.– 4. Above, there are no significant adverse effects remaining.
Genesis Energy Limited	P26.15	15.24	Renewable Electricity Generation	Rules	REG-R1	Support	Provision for the operation and maintenance of an existing hydroelectric power station and its associated structures as a permitted activity is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.25	Renewable Electricity Generation	Rules	REG-R2	Support in Part	The intent of Rule REG-R2 is supported, however the drafting should be amended to more clearly reference scheme and structures “associated” with the Opuha Scheme.	Amend Rule REG-R2 as follows: REG-R2 – Upgrade of an existing hydroelectric power station and associated structures associated with the Opuha Scheme, or within the existing footprint or core sites of the Waitaki Power Scheme.
Genesis Energy Limited	P26.15	15.26	Renewable Electricity Generation	Rules	REG-R3	Support in Part	Provision for the upgrade of an existing structure within an operating easement of the Waitaki Power Scheme as a permitted activity where the relevant development standards are met is supported, along with the controlled activity status that applies when the standards cannot be met. However, Genesis does not support matter of control REG-MD1(b) – as set out in other submission point.	Retain Rule REG-R3 as notified subject to relief sought to REG-MD1(b).
Genesis Energy Limited	P26.15	15.27	Renewable Electricity Generation	Rules	REG-R4	Support in Part	The provision for the development of new renewable electricity generation activities associated with an existing hydroelectric power station, including associated structures as a controlled activity is supported. However, Genesis does not support matter of control REG-MD1(b) – as set out in other submission point, and matter of discretion REG-MD2(i) – as set out in other submission point.	Retain REG-R4 as notified subject to relief sought to REG-MD1(b) and REG-MD2(i).
Genesis Energy Limited	P26.15	15.28	Renewable Electricity Generation	Rules	REG-R5	Support in Part	The provision for investigation activities as a permitted activity where the relevant conditions are met is supported. The restricted discretionary activity status that applies when the conditions of the	Retain Rule REG-R5 as notified subject to relief sought to REG-MD3(d).

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							permitted activity cannot be met is also supported. However, Genesis considers that REG-MD3(d) is inconsistent with the direction of NPS-REG Policy C2 and seeks that this matter be amended.	
Genesis Energy Limited	P26.15	15.29	Renewable Electricity Generation	Rules	REG-R6	Support	The provision for small-scale renewable electricity generation activities as a permitted activity is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.30	Renewable Electricity Generation	Rules	REG-R7	Support in Part	The provision for any renewable electricity generation activities not otherwise listed outside the areas specified as a restricted discretionary activity is supported. The provision for any renewable electricity generation activities not otherwise listed within an area of significant indigenous vegetation or significant habitat of indigenous fauna, Outstanding Natural Landscape, Outstanding Natural Feature, Sites and Areas of Significance to Māori, a setback distance specified in Table NATC-1, or on Highly Productive Land as a Discretionary Activity is also supported. However, Genesis considers that REG-MD4(b) is inconsistent with Policy C2 of the NPS-REG – as set out in other submission point.	Retain Rule REG-R7 as notified subject to relief sought to REG-MD4(b).
Genesis Energy Limited	P26.15	15.31	Renewable Electricity Generation	Matters of Discretion or Control	REG-MD1	Oppose in Part	REG-MD1 relates to the upgrade of an existing structure within an operating easement of the Waitaki Power Scheme where the permitted activity condition is not able to be met. Rule 2.1.1(5) of the Ecosystems and Indigenous Biodiversity Chapter that was subject to PC18 provides for the clearance of indigenous vegetation where “the clearance is required for the refurbishment of the Waitaki Power Scheme, and is located outside of the existing footprint or core sites but within the operating easement, and outside of significant indigenous vegetation and significant habitats of indigenous fauna” as a permitted activity. On the basis that the definition of “refurbishment of the Waitaki Power Scheme Opuha Scheme or National Grid” as introduced by PC18 includes the “upgrade or renewal (to gain efficiencies in generating and transmitting electricity) of machinery, buildings, plant, structure, facilities, works or components and operating facilities associated with the infrastructure” Genesis considers that REG-MD1(b) is not necessary as indigenous vegetation is already provided for under chapter 19 as a permitted activity and should be deleted.	Amend REG-MD1 as follows: REG-MD1 Existing Hydroelectric Power a. The nature of any visual effects of the building or structure on the skyline and open landscape. b. The nature of any effects on any indigenous vegetation and habitats of indigenous fauna. c. The nature of any adverse effects on the environment from construction of the building or structure including earthworks, dust, run-off, sedimentation, noise and traffic...
Genesis Energy Limited	P26.15	15.32	Renewable Electricity Generation	Matters of Discretion or Control	REG-MD2	Oppose in Part	Genesis considers that matter of discretion (i) should be deleted on the basis that the same effect is already addressed by matters (c) and (e).	Amend REG-MD2 as follows: REG-MD2 Maximum Operating Level Changes ... h. The extent of effects on Sites and Areas of Significance to Māori. i. The visual impact of roading. j. The extent to which the activity exacerbates lakeshore erosion and/or weakening of hillslopes.
Genesis Energy Limited	P26.15	15.33	Renewable Electricity Generation	Matters of Discretion or Control	REG-MD3	Oppose in Part	The matters of discretion in REG-MD3 which relate to investigation activities in areas defined in the definitions section of the plan as “Sensitive Areas” are generally supported, however Genesis considers that REG-MD3(d) is inconsistent with Policy C2 of the NPS-REG.	Amend REG-MD3 as follows: REG-MD3 Specified Areas ... d. The effectiveness of any proposed offsetting or compensation measures when any significant residual effects

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								<u>cannot be avoided, remedied or mitigated.</u> e. ...
Genesis Energy Limited	P26.15	15.34	Renewable Electricity Generation	Matters of Discretion or Control	REG-MD4	Oppose	The matters of discretion in REG-MD4 which relate to the any renewable electricity generation activities not otherwise provided listed (which includes new renewable electricity generation activities) are generally supported. However, as discussed above in relation to Policy REG-P5, REG-MD4(b) and (c) are not considered to be consistent with Policy C2 of the NPS-REG and these matters should be amended and an additional matter included to reflect the relief sought for Policy REG-P5.	Amend REG-MD4 as follows: REG-MD4 New Renewable Electricity Generation a. The appropriateness of measures to avoid, remedy or mitigate adverse effects. b. The effectiveness of any proposed offsetting or compensation measures <u>when any significant residual effects cannot be avoided, remedied or mitigated.</u> c. The functional needs and operational needs of the activity. <u>x. the need to located renewable electricity generation activities where the renewable energy resource is available.</u> d. The location of existing electricity generation and distribution infrastructure and the extent to which the proposal contributes to its efficient use...
Genesis Energy Limited	P26.15	15.35	Infrastructure	Introduction		Oppose in Part	The introduction clarifies that the provisions in other chapters of the plan do not apply to the activities managed in this chapter, except those that are identified which is supported. Genesis considers that clarification should be provided that REG activities are managed under the REG chapter of the plan only.	Amend the introduction by including the following paragraph: <u>Renewable electricity generation activities are not subject to the provisions in this chapter.</u>
Genesis Energy Limited	P26.15	15.36	Infrastructure	Objectives	INF-O1	Support	Support the intent of Objective INF-O1 as the development and maintenance of infrastructure to meet the needs, and provide for the health, safety and wellbeing, of people and communities in a way that is integrated with subdivision, use and development is appropriate.	Retain as notified.
Genesis Energy Limited	P26.15	15.37	Infrastructure	Objectives	INF-O2	Support	Support Objective INF-O2 as it seeks to manage the adverse effects infrastructure on the surrounding environment according to the sensitivity of the environment and the function needs or operational needs of the infrastructure which is appropriate.	Retain as notified.
Genesis Energy Limited	P26.15	15.38	Infrastructure	Objectives	INF-O3	Support in Part	Support the intent of Objective INF-O3 which seeks to ensure that the efficient operation, maintenance, upgrading and development of regionally significant infrastructure is not constrained or compromised by other activities; however, consider that infrastructure of local and national significance along with lifeline utility infrastructure should also be included alongside regionally significant infrastructure.	Amend Objective INF-O3 as follows: The efficient operation, maintenance, upgrading and development of locally , regionally or nationally significant infrastructure <u>and lifeline utility infrastructure</u> is not constrained or compromised by other activities.
Genesis Energy Limited	P26.15	15.39	Infrastructure	Policies	INF-P1	Support	The recognition of the national, regional and local benefits of infrastructure to the economic, social, cultural and environmental wellbeing, and health and safety, of people and communities and the functioning of the District and beyond, by providing for infrastructure throughout the District is appropriate.	Retain as notified.
Genesis Energy Limited	P26.15	15.40	Infrastructure	Policies	INF-P2	Support	The intent of Policy INF-P2 is appropriate.	Retain as notified.
Genesis Energy Limited	P26.15	15.41	Infrastructure	Policies	INF-P3	Oppose in Part	The intent of Policy INF-P3 is generally supported, in particular the encouragement of technological improvements and enhancements. Genesis however consider that greater clarification that co-location of structures and facilities should only be encouraged when their functioning or operation are related to each other and the efficiency and / or effectiveness of their construction and use is improved by co-location.	Amend INF-P3 as follows: Encourage: ... 2. the co-location of structures and facilities <u>where their functioning and/or operation are related to each other and the efficiency and/or effectiveness of their construction and use is improved by co-location</u> ; and...

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Genesis Energy Limited	P26.15	15.42	Infrastructure	Policies	INF-P4	Support	The intent of Policy INF-P4 is supported, in particular, it is appropriate to have regard to the operational needs and functional needs of the infrastructure.	Retain as notified.
Genesis Energy Limited	P26.15	15.43	Infrastructure	Policies	INF-P5	Oppose in Part	The intent of Policy INF-P5 which seeks to avoid locating infrastructure in identified sensitive areas or within an area of significant indigenous vegetation or significant habitat or indigenous fauna, unless there is a functional or operational need for the infrastructure to be in that location is generally supported. However, Genesis considers energy storage systems that help to avoid outages and the efficient supply and use of renewable electricity should be included alongside the national grid in the exemptions from condition 4 given their national significance and functional or operational need to be located near renewable electricity generation activities and / or the national grid.	Amend INF-P5 as follows: Avoid locating infrastructure in identified sensitive areas (outside the road reserve) or within an area of significant indigenous vegetation or significant habitat of indigenous fauna, unless: ... 4. Following application of 1. - 3. above, there are no significant adverse effects remaining, (except that this clause shall not apply to the national grid or to energy storage facilities associated with the supply of renewable electricity).
Genesis Energy Limited	P26.15	15.44	Infrastructure	Policies	INF-P6	Oppose in Part	Genesis generally supports the policy pathway provided by INF-P6 for the establishment of regionally significant infrastructure or lifeline utility infrastructure that has a functional or operational need to be located on highly productive land. However, Genesis considers that nationally significant infrastructure should also be included.	Amend INF-P6 as follows: Avoid locating infrastructure on Highly Productive Land, unless: 1. it is small-scale and does not impact the productive capacity of the land; or 2. it is regionally or nationally significant infrastructure or lifeline utility infrastructure and has a functional need or operational need to be located on the highly productive land; and...
Genesis Energy Limited	P26.15	15.45	Infrastructure	Policies	INF-P7	Oppose in Part	Generally supports INF-P7 however, considers that nationally significant infrastructure should also be provided the ‘exception’ in this policy on the basis that it is possible that nationally significant infrastructure, that is not otherwise described as regionally significant infrastructure or lifeline utility infrastructure, may have a functional need or operational need to be located in areas of significant indigenous vegetation and significant habitats of indigenous fauna. Further to this, as previously discussed, Genesis considers energy storage systems given their national significance and functional or operational need to be located near renewable electricity generation activities and / or the national grid, the same exemption from exemption from INF-P7 should be applied to energy storage facilities as is provided to the national grid.	Amend INF-P7 as follows: In addition to INF-P5, avoid new infrastructure (excluding the national grid and energy storage facilities associated with the supply of renewable electricity) that has adverse effects on the following, in an area of significant indigenous vegetation and significant habitats of indigenous fauna: ... 5. a reduction in the population size or occupancy of Threatened or At Risk (declining) species that use significant indigenous vegetation and significant habitats of indigenous fauna for any part of their life cycle, unless it is lifeline utility infrastructure or regionally or nationally significant infrastructure, in which case INF-P5 applies instead, where: 6. the infrastructure provides significant national or regional public benefits; 7. there is a functional need or operational need for the infrastructure to be in that particular location; and 8. there are no practicable alternative locations for the infrastructure outside of an area of significant indigenous vegetation and significant habitats of indigenous fauna.
Genesis Energy Limited	P26.15	15.46	Infrastructure	Rules	INF-R1	Support	The provision for the operation, maintenance or removal of existing infrastructure, including access tracks as a permitted activity is supported.	Retain as notified.
Genesis Energy Limited	P26.15	15.47	Infrastructure	Rules	INF-R6	Support	Understands that Rule INF-R6 provides for any Infrastructure Buildings or Structure, or Accessory Building to Infrastructure not otherwise listed as a permitted activity subject to compliance with INF-S1 to INF-S3, which would otherwise be a restricted discretionary activity. On	Retain as notified.

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							the basis that battery energy storage systems are included in the definition of infrastructure as sought by Genesis through submission point 3 above, these systems and any of their associated buildings and structures would be subject to this rule.	
Genesis Energy Limited	P26.15	15.48	Infrastructure	Standards	INF-S1	Support	Standard INF-S1 requires (unless located within road reserve) that infrastructure is located outside of any sensitive area. The activity status for infrastructure located within sensitive areas is a restricted discretionary activity, with matters of discretion restricted to: functional or operational need for the location of the activity, the management of adverse effects on the values of the sensitive area, and the benefits of the activity which is supported.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.01	Interpretation	Definitions	Various	Support	Considers the following new definitions to be appropriate in the context of the provisions of PC 26: <ul style="list-style-type: none"> •Antenna •Earthworks •Functional need •Investigation activities •Network utility operator •Pole •Regionally significant infrastructure •Sensitive activity •Sensitive area 	Retain the following definitions as notified: <ul style="list-style-type: none"> •Antenna •Earthworks •Functional need •Investigation activities •Network utility operator •Pole •Regionally significant infrastructure •Sensitive activity •Sensitive area
Opuha Water Limited (OWL)	P26.16	16.02	Interpretation	Definitions	Small Scale Renewable Energy Generation Activity	Oppose in Part	Notes a minor correction is required to the definition of “small scale renewable electricity generation activity”.	Amend the definition of “Small scale renewable electricity generation activity” as follows: b.electricity generated into to the electricity generation distribution network
Opuha Water Limited (OWL)	P26.16	16.03	Interpretation	Definitions	Upgrade	Oppose in Part	Considers that the definition needs to be clearer so as to include new buildings or structure that may be required as part of an upgrade.	Amend the definition of “upgrade” as follows: In relation to renewable electricity generation activities and infrastructure, means activities undertaken to increase the capacity, operational efficiency, security of safety of existing assts and activities, including new buildings and structures required for those purposes.
Opuha Water Limited (OWL)	P26.16	16.04	Infrastructure	Introduction	Introduction	Oppose in Part	<p>The Introduction advises that provisions in other chapters do not apply to activities managed in the Infrastructure chapter, except natural hazards, historical heritage, notable trees, ecosystems and indigenous biodiversity, activities on surface water, light, noise, signs. This approach is appropriate, in particular, that infrastructure activities within certain overlay areas are addressed by the rules in the Infrastructure chapter rather than the chapters addressing those overlay areas (e.g. SASM and NTC).</p> <p>However, unlike other chapters (e.g., GRUZ chapter), the relationship between rules in the Infrastructure Chapter and those in other chapters is only addressed in the Introduction section, rather than in the advisory notes for the rules table. It would be beneficial for a consistent approach to be taken across the district plan in relation to the location of these explanations.</p>	<p>(a) Retain the approach adopted by MDC in the plan review process that infrastructure activities in overlay areas such as SASMs and NTC are governed by the rules contained in the Infrastructure and Renewable Electricity Generation chapters.</p> <p>(b) Amend Plan Change 26 as necessary to ensure the location of the explanation of how rules for infrastructure activities interrelate with rules in other chapters is consistent across all chapters of the district plan. This may require either:</p> <ul style="list-style-type: none"> •The retention of the explanation in the Introduction section of the Infrastructure chapter; or •The explanation to be moved to the “Notes to Plan Users” under the Rules section of the Infrastructure chapter.

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Plan Change 26 to the Mackenzie District Plan - Renewable Electricity Generation and Infrastructure								
Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Opuha Water Limited (OWL)	P26.16	16.05	Infrastructure	Objectives	INF-O1	Support	INF-O1 provides appropriate guidance on the purpose of the development and maintenance of infrastructure and its integration with subdivision, use and development.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.06	Infrastructure	Objectives	INF-O2	Support	INF-O2 appropriately captures the approach that needs to be taken in the district plan in terms of the adverse effects on infrastructure.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.07	Infrastructure	Objectives	INF-O3	Support	INF-O3 appropriately captures the approach that needs to be taken in the district plan in terms of the adverse effects on infrastructure.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.08	Infrastructure	Policies	INF-P1	Support	Considers it appropriate for the policy directives in the Infrastructure chapter to recognise the benefits of infrastructure to the district.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.09	Infrastructure	Policies	INF-P2	Support	Considers it appropriate for the policy directives in the Infrastructure chapter to recognise the need for enabling the ongoing operation, maintenance, replacement, reconstruction, and minor upgrades to, existing infrastructure.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.10	Infrastructure	Policies	INF-P4	Support	Considers it appropriate for the policy directives in the Infrastructure chapter to provide guidance on managing the effects of infrastructure.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.11	Infrastructure	Policies	INF-P5	Support	Supports the effects management hierarchy provided in INF-P5 for dealing with adverse effects in sensitive or significant areas. Also supports the recognition that certain infrastructure will have a functional or operational need for locating in such areas, such as infrastructure activities associated with regionally and nationally significant infrastructure.	Retain INF-P5 as notified, subject to the submission on INF-P7.
Opuha Water Limited (OWL)	P26.16	16.12	Infrastructure	Policies	INF-P6	Support	INF-P6 is aligned with and gives effect to the NPS-HPL.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.13	Infrastructure	Policies	INF-P7	Oppose in Part	It is unclear what the areas of “Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna” that are subject to this policy are, as they do not appear to have been included in the planning maps. The submission on INF-P7 is therefore provided without prejudice to any future submission it may need to make when the locations of “Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna” are mapped and confirmed in the district plan. OWL questions whether the position with respect to the policies applying to regionally significant infrastructure and lifelines utility infrastructure could be more clearly articulated e.g., as part of Policy INF-P5. OWL is concerned that the second part of Policy INF-P7 is particularly confusing in terms of its cross-reference back to INF-P5.	(a) Include areas identified as “Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna” in the district plan and planning maps; (b) Amend INF-P5 and INF-P7 to provide more clarity as to which policies apply to lifeline utility infrastructure and regionally significant infrastructure.
Opuha Water Limited (OWL)	P26.16	16.14	Infrastructure	Rules	INF-R1	Support	Considers it appropriate that the operation, maintenance or removal of existing infrastructure, including access tracks is a permitted activity.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.15	Infrastructure	Rules	INF-R2	Support	Considers it appropriate for upgrading above ground infrastructure to be enabled through a permitted activity rule.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.16	Infrastructure	Rules	INF-R3	Oppose in Part	Considers it is appropriate that the district plan enables minor upgrades for the Opuha Dam, in recognition of its status as regionally significant infrastructure. However, the upgrades governed by this rule should include new buildings/structures (so long as they comply with the height limit of the zone in which they are located). This could be included in the definition of “upgrade” or as a further condition of the Permitted Activity Rule. It may be appropriate for a definition of the Opuha Dam to be included in the district plan as this term, in the context of Rule INF-R3 differs from the term “Opuha Scheme”, which	(a) Retain REG-R2 as notified, subject to: (i) OWL’s submission on the definition of “upgrade”; or in the alternative (ii) Inclusion of a further permitted activity condition as follows: Any new building or structure shall comply with the height limit for the zone in which the activity is located. (b) Consideration be given to Including a definition of the term “Opuha Dam”.

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							is used and has been defined in PC18 (Indigenous Biodiversity) (Opuha Scheme: means the electricity generation activity associated with the Opuha Dam and power station (including the regulating pond and downstream weir) and all structures, works, facilities, components, plant and activities undertaken to facilitate that generation.)	
Opuha Water Limited (OWL)	P26.16	16.17	Infrastructure	Rules	INF-R4	Support	Considers it appropriate for temporary infrastructure to be enabled through a permitted activity rule.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.18	Infrastructure	Rules	INF-R5	Support	Considers it appropriate for navigational aids, meteorological, sensing and environmental monitoring equipment to be enables through permitted activity rules.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.19	Infrastructure	Rules	INF-R6	Support	The permitted activity standards for all infrastructure buildings/structures not otherwise provided for in INF-R6 are appropriate.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.20	Infrastructure	Rules	INF-R7	Oppose in Part	The conditions of INF-R7 and the applicable standards to be appropriate for the activities governed by this rule.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.21	Infrastructure	Rules	INF-R8	Support	The conditions of INF-R8 and the applicable standards to be appropriate for the activities governed by this rule.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.22	Infrastructure	Rules	INF-R9	Oppose in Part	It would be appropriate for this rule to be expanded to apply to reservoirs containing less than 22,700 litres, wells and supply intakes associated with regionally significant infrastructure, such as established community-scale irrigation and stockwater infrastructure. It is unclear why this rule has been limited in scope to such activities associated with public water supply. Expanding the scope of this rule to the stated activities associated with Regionally Significant Infrastructure is required to implement Policy INF-P1, by recognising the benefits of such infrastructure.	Amend the heading of INF-R9 as follows: Reservoirs Containing less than 22,700 litres, Wells and Supply Intakes for the Reticulation or Provision of Public Water Supply or associated with Regionally Significant Infrastructure
Opuha Water Limited (OWL)	P26.16	16.23	Infrastructure	Rules	INF-R10	Support	The conditions of INF-R7 and applicable standards to be appropriate for the activities governed by this rule.	Retain INF-R10 as notified, subject to OWL’s submissions on INF-R3 and INF-R7 being accepted.
Opuha Water Limited (OWL)	P26.16	16.24	Infrastructure	Rules	INF-R11	Support	Provided the submission on Rule INF-R3 and R7 are accepted, the discretionary activity status is appropriate for any infrastructure activities not otherwise listed.	
Opuha Water Limited (OWL)	P26.16	16.25	Infrastructure	Standards	INF-S1 - INF-S3	Support	Standards INF-S1 to S3 are appropriate.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.26	Infrastructure	Matters of Discretion or Control	INF-MD1	Support	INF-MD1 provides an appropriate range of matters of discretion for resource consent applications associated with infrastructure activities.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.27	Renewable Electricity Generation	Introduction		Support	The objectives and policy framework in this chapter align with and give effect to the NPS-REG.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.28	Renewable Electricity Generation	Objective and Policies	REG-O1 - REG-O2 REG-P1, REG-P4 - REG-P6	Support	The objectives and policy framework in this chapter align with and give effect to the NPS-REG.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.29	Renewable Electricity Generation	Rules	REG-R1	Support	This rule aligns with and gives effect to the NPS-REG, whilst also implementing REG-O1 and REG-P1.	Retain as notified.

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Opuha Water Limited (OWL)	P26.16	16.30	Renewable Electricity Generation	Rules	REG-R2	Oppose in Part	Considers it appropriate for the chapter to include a permitted activity rule for the upgrade of existing HEPS and associated structures associated with the “Opuha Scheme”. This rule aligns with and gives effect to the NPS-REG, whilst also implementing REG-O1 and REG-P1. However, the upgrades governed by this rule should include new buildings/structures (so long as they comply with the height limit of the zone in which they are located). This could be included in the definition of “upgrade” or as a further condition of the Permitted Activity Rule. A definition for “Opuha Scheme” has been included in the district plan through PC18 (Indigenous Biodiversity).	Retain REG-R2 as notified, subject to: a. OWL’s submission on the definition of “upgrade”; or in the alternative b. Inclusion of a further permitted activity condition as follows: Any new building or structure shall comply with the height limit for the zone in which the activity is located.
Opuha Water Limited (OWL)	P26.16	16.31	Renewable Electricity Generation	Rules	REG-R4	Support	A controlled activity status is appropriate for the development of new renewable electricity generation activities associated with existing HEPS where the activity satisfies condition 1, and restricted discretionary activity status where that condition is not complied with.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.32	Renewable Electricity Generation	Rules	REG-R5	Support	Considers it appropriate for investigation activities to be provided for through Rule REG-R6.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.33	Renewable Electricity Generation	Rules	REG-R6	Support	Considers it is appropriate for small-scale renewable electricity generation activities to be provided for through Rule REG-R6.	Retain as notified.
Opuha Water Limited (OWL)	P26.16	16.34	Renewable Electricity Generation	Rules	REG-R7	Support	Subject to the submissions on the scope of “upgrades” to the Opuha Scheme, it is appropriate for all renewable electricity generation activities not otherwise listed to be provided for through Rule REG-R6.	Retain REG-R7 as notified, subject to the submission on REG-R2.
Opuha Water Limited (OWL)	P26.16	16.35	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD1 - REG-MD4	Support	Considers the range of matters of discretion provided for in REG-MD1 to MD4 is appropriate.	Retain as notified.
Alpine Energy Limited	P26.17	17.01	Interpretation	Definitions	Electricity Distribution Corridor	Support	This definition aligns with other recently reviewed District Plans and has been tested for accuracy and appropriateness through these processes.	Retain as notified.
Alpine Energy Limited	P26.17	17.02	Infrastructure	Objectives	INF-O3	Support in Part	As a Lifeline Utility, Alpine Energy Limited supports the Plan’s objective that ‘efficient operation maintenance, upgrading and development of regionally significant infrastructure is not constrained or compromised by other activities.’ We seek an amendment to this objective. This aligns with INF-P5 and INF-P7 which recognises lifeline utility infrastructure alongside regionally significant infrastructure.	Amend as follows: The efficient operation maintenance, upgrading and development of regionally significant infrastructure and lifeline utility infrastructure is not constrained or compromised by other activities.’
Alpine Energy Limited	P26.17	17.03	Infrastructure	Policies	INF-P1	Support	This policy enables Alpine Energy Limited to plan, and operate, maintain, repair, upgrade and develop the electricity distribution network in an effective, safe and affordable way to support our communities, while mitigating any adverse effects caused by the infrastructure and activities associated with it.	Retain as notified.
Alpine Energy Limited	P26.17	17.04	Infrastructure	Policies	INF-P5	Support	Supports the recognition of the benefits provided by lifeline utility infrastructure. Notes that PC18 as notified introduced rules that would affect the vegetation management operations of Alpine Energy Limited (refer to submission for listed examples). Alpine Energy Limited is aware that PC18 is subject to Environment Court appeals, which have been resolved through mediation and the mediated outcomes have been addressed by draft consent documentation that has been filed with the Environment Court. However, Alpine Energy Limited understands the finalised Consent Orders have not been released by	Retain as notified.

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							<p>the Environment Court at this time.</p> <p>Following the issue of the Consent Orders, Council will be required to amend the notified version of PC18 to reflect the mediated outcome. Alpine Energy Limited expects that some alignment with other District Plan chapters, including those subject to the plan changes currently notified, will be required. Alpine Energy Limited expects that Council will attend to this as part of its final “mop-up” stage of the District Plan Review. Alpine Energy Limited’s submission on PC26 is therefore made without prejudice to any submission that it may make in relation to any future plan change(s) promulgated to align provisions in chapters of the Mackenzie District Plan that have already been reviewed and subject to stand alone plan changes with the updated Plan Change 18 provisions as directed by the Consent Orders.</p>	
Alpine Energy Limited	P26.17	17.05	Infrastructure	Policies	INF-P10	Support	<p>This policy aligns with other recently reviewed District Plans in Canterbury and across the motu. This policy will support the higher order objectives within the Plan, particularly INF-O3. Encroachment on existing and future significant electricity distribution line corridors has the potential to add risk to electricity security of supply and reliability. The 33kV lines proposed to be covered by this policy and accompanying rules, are critical to the supply of electricity to Twizel, Tekapo, Fairlie and Aoraki/Mount Cook communities. If these lines are compromised, it is difficult to provide an alternative electricity supply to customers quickly. The proposed rules will help minimise the risk to critical infrastructure and enable Alpine Energy to continue to provide safe and reliable electricity within the Mackenzie District.</p> <p>The inclusion of the NPSREG in this Plan Change recognises the importance of future renewable electricity infrastructure within the Mackenzie District. Our 33kV distribution lines will play an essential role in connecting new energy resources to local and national networks. This policy will future-proof the Plan for the evolving energy system. Considering the implementation of the NPSREG, we submit that ensuring the protection of significant electricity distribution infrastructure is as critical as protecting the National Grid infrastructure.</p>	Retain as notified.
Alpine Energy Limited	P26.17	17.06	Infrastructure	Rules	INF-R2	Support	<p>Support the proposed rules for the realignment, reconfiguration, relocation, and replacement of above ground infrastructure. These rules enable cost effective management, including the maintenance and upgrading of the overhead lines portion of the network. We note that, while more aesthetically pleasing, the requirement to underground lines imposes considerable additional cost on the operation, maintenance, and development of the electricity distribution network. This cost is ultimately borne by the community through electricity lines charges or customers through connection charges. We urge Council to consider this in relation to any potential amendments imposing further requirements to underground existing lines to these and future plan changes.</p>	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Alpine Energy Limited	P26.17	17.07	Infrastructure	Rules	INF-R8	Support in Part	<p>Seeks an amendment to this rule to permit the installation of new overhead lines and structures in Rural Lifestyle and Industrial zones. A requirement to underground all new lines and extensions of more than three structures in these zones could add significant cost to customers seeking to connect to the electricity distribution network, and to all Mackenzie District electricity consumers through the increased cost to underground significant parts of our expanding network across a growing District. The undergrounding of new lines in Rural Lifestyle and Industrial zones is out of step with other Canterbury District Plans.</p> <p>We acknowledge the role of objectives and policies requiring further compliance for new lines within ONL and ONF overlays. We look forward to working with Mackenzie District Council to avoid and mitigate any adverse effects on ONL and ONF from the essential distribution infrastructure required to support district wide development, and to achieve objectives including REG-O1 – to maintain or increase output from renewable electricity generation in the District.</p>	<p>Amend as follows:</p> <p>1. Where located within a Residential, Rural Lifestyle, Open Space, Commercial and Mixed Use, Industrial or Pukaki Village Zone:</p> <p>a. Any new lines must be located underground; or</p> <p>b. Any extension to an existing overhead line must involve no more than three additional support structures.</p>
Alpine Energy Limited	P26.17	17.08	Infrastructure	Rules	INF-R28 - INF-R31	Support	<p>These rules align with other recently reviewed District Plans in Canterbury and across the motu. These rules will support the higher order objectives within the Plan, particularly INF-O3. Encroachment on existing and future significant electricity distribution line corridors has the potential to add risk to electricity security of supply and reliability. The 33kV lines covered by INF-P10 and these accompanying rules, are critical to the supply of electricity to Twizel, Tekapo, Fairlie and Aoraki/Mount Cook communities. If these lines are compromised, they are difficult to replace with an alternative electricity supply quickly. The proposed rules will help minimise the risk to critical infrastructure and enable Alpine Energy to continue to provide safe and reliable electricity within the Mackenzie District.</p> <p>The inclusion of the NPSREG in PC26 recognises the importance of future renewable electricity infrastructure within the Mackenzie District. Our 33kV distribution lines will play an essential role in connecting these energy resources to local and national networks. This policy will future-proof the Plan for the evolving energy system. Considering the implementation of the NPSREG, we submit that ensuring the protection of significant electricity distribution infrastructure is as critical as protecting the National Grid infrastructure.</p>	Retain as notified.
Alpine Energy Limited	P26.17	17.09	Renewable Electricity Generation	Objectives	REG-O1	Support	<p>Supports the objective to increase renewable electricity generation within the Mackenzie District and look forward to working with Council and other key stakeholders to support the distribution of increased renewable electricity to local communities.</p> <p>We urge Council to consider the importance of electricity distribution infrastructure to achieving the higher order outcomes sought by the NPSREG when making decisions relating to policies and rules for electricity distribution infrastructure.</p>	Retain as notified.

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Submitter	Number	Point	Section	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Meridian Energy Limited	P26.18	18.01	Interpretation	Definitions	New Definition - Minimise		The term “minimise” is used in INF-P4 and INF-P6 but is not defined in the plan change. Seeks adoption of the definition of “minimise” set out in its relief sought.	Insert new definition as follows: Minimise means: to reduce to the smallest amount reasonably practicable.
Meridian Energy Limited	P26.18	18.02	Interpretation	Definitions	Earthworks	Support	Meridian considers that the definition of “earthworks” adequately describes the activity.	Retain as notified.
Meridian Energy Limited	P26.18	18.03	Interpretation	Definitions	Functional Need	Support	Meridian considers that the definition of “functional need” adequately describes the need.	Retain as notified.
Meridian Energy Limited	P26.18	18.04	Interpretation	Definitions	Infrastructure	Oppose	<p>Notes that the term “infrastructure” is listed in PC26’s definitions but is not marked as being affected by a plan change. The definition states that “infrastructure” has the same meaning as in section 2 of the Act. This includes “facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity”.</p> <p>Considers that it is appropriate to adopt the definition of infrastructure from the Act as a base, however there is a significant gap in the definition with energy storage facilities not included in the list. Energy storage facilities are key to capturing electricity generated during periods when demand is less than supply (i.e. generation) and then supplying electricity when demand is greater than supply. This aids efficiency of energy use and helps to prevent outages. Given the national significance of renewable electricity sources and minimising the use of non-renewable electricity sources, Meridian considers that such facilities should be specifically identified in the definition of “infrastructure”.</p>	<p>Amend the first line and part (d) of the definition of “Infrastructure” as follows: Has the same meaning as in section 2 of the RMA, with an added reference to energy storage facilities, (as set out below)...</p> <p>(d) facilities for the generation of electricity, energy storage facilities associated with the supply of renewable electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person.</p> <p>Alternatively, if the definition of “Infrastructure” is not amended, then all references to “Infrastructure” in the plan (including current operative provisions, current notified plan changes and future plan changes) should be amended to refer to “infrastructure and energy storage facilities associated with the supply of renewable electricity”.</p>
Meridian Energy Limited	P26.18	18.05	Interpretation	Definitions	Investigation Activities	Support	Considers that the proposed definition of “investigation activities” is robust.	Retain as notified.
Meridian Energy Limited	P26.18	18.06	Interpretation	Definitions	Lifeline Utility Infrastructure	Support	Supports adoption of the definition of “lifeline utility infrastructure” that is contained in the Civil Defence Emergency Management Act 2002.	Retain as notified.
Meridian Energy Limited	P26.18	18.07	Interpretation	Definitions	Operational Need	Support	The definition of “operational need” is coloured pink in PC24 meaning the term is currently limited to the residential, commercial and mixed use and general industrial zones and Plan Changes 23, 24, 25, 26 and 27 propose to extend the application of the term to those chapters introduced through plan changes 23, 24, 25, 26 and 27, where the terms are used in those chapters. On this basis, Meridian considers that the definition of “operational need” adequately describes the need and should be applied throughout the plan.	Retain the definition of “operational need” as notified and apply it throughout the plan.
Meridian Energy Limited	P26.18	18.08	Interpretation	Definitions	Small-Scale Renewable Electricity Generation Activity	Support	Considers that the proposed definition of “Small-scale renewable electricity generation activity” is somewhat consistent with the definition for “Small and community-scale distributed electricity generation” in the NPS-REG and is generally helpful.	Retain as notified.
Meridian Energy Limited	P26.18	18.09	Interpretation	Definitions	Upgrade	Support	Considers that the proposed definition of “upgrade” in relation to renewable electricity generation activities and infrastructure is robust.	Retain as notified.
Meridian Energy Limited	P26.18	18.10	Infrastructure	Introduction		Oppose in Part	Considers that clarification should be provided to plan users that renewable electricity generation activities are managed under the REG chapter of the plan and are not subject to the provisions in the Infrastructure (INF) chapter.	Amend the INF Introduction by adding the following paragraph: Renewable electricity generation activities are not subject to the provisions in this chapter.

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Meridian Energy Limited	P26.18	18.11	Infrastructure	Objectives	INF-O1	Support	Considers this objective to be an appropriate outcome sought within the Mackenzie District.	Retain as notified.
Meridian Energy Limited	P26.18	18.12	Infrastructure	Objectives	INF-O2	Support	Considers this objective to be an appropriate outcome sought within the Mackenzie District, and more specifically supports the recognition of the functional needs or operational needs of the infrastructure.	Retain as notified.
Meridian Energy Limited	P26.18	18.13	Infrastructure	Objectives	INF-O3	Oppose in Part	While Meridian generally supports INF-O3, Meridian considers that it should be extended to address locally, regionally and nationally significant infrastructure. With this, Meridian notes that the notified definition of regionally significant infrastructure does not include nationally significant infrastructure, and considers that specific reference to nationally significant infrastructure is needed in this objective.	Amend Objective INF-O3 as follows: The efficient operation, maintenance, upgrading and development of <u>locally</u> , regionally <u>and nationally</u> significant infrastructure is not constrained or compromised by other activities.
Meridian Energy Limited	P26.18	18.14	Infrastructure	Policies	INF-P1	Support	Considers that recognition of the national, regional and local benefits of infrastructure, and provision for the same, is fundamental to well-functioning communities.	Retain as notified.
Meridian Energy Limited	P26.18	18.15	Infrastructure	Policies	INF-P2	Support	Considers that existing infrastructure should continue to be enabled to operate, be maintained and/or replaced (including reconstruction) and be upgraded.	Retain as notified.
Meridian Energy Limited	P26.18	18.16	Infrastructure	Policies	INF-P3	Oppose in Part	Generally supports INF-P3, but considers that co-location of structures and facilities should only be encouraged when their functioning/operation are related to each other and the efficiency and/or effectiveness of their construction and use is improved by co-location.	Amend INF-P3 as follows: Encourage: 1. the coordination of infrastructure planning and delivery with land use, subdivision, development and urban growth; 2. the co-location of structures and facilities <u>where their functioning and/or operation are related to each other and the efficiency and/or effectiveness of their construction and use is improved by co-location</u> ; and 3. technological improvements and enhancements.
Meridian Energy Limited	P26.18	18.17	Infrastructure	Policies	INF-P4	Oppose in Part	Generally support INF-P4, but notes that “minimise” is not defined in the plan change. As previously discussed, Meridian seeks adoption of the definition of “minimise” set out in its relief sought. Without this change to PC26 INF-P4 is unclear.	Retain INF-P4 as notified and at the same time, as previously requested, insert new definition as follows: <u>Minimise means: to reduce to the smallest amount reasonably practicable.</u>
Meridian Energy Limited	P26.18	18.18	Infrastructure	Policies	INF-P5	Oppose in Part	Concerned that energy storage facilities should fall within the definition of infrastructure rather than renewable electricity generation activities, and that as such INF-P5 will apply to them. Energy storage facilities are key to ensuring that outages are avoided, and renewable electricity is used efficiently. They must be located within proximity of renewable electricity generation structures and/or transmission infrastructure. Given the national significance of energy storage facilities, and their functional and operational need to be located together with renewable electricity generation structures and/or transmission infrastructure, the same exemption from condition 4 should be applied to energy storage facilities as is provided to the national grid.	Amend INF-P5 as follows: Avoid locating infrastructure in identified sensitive areas (outside the road reserve) or within an area of significant indigenous vegetation or significant habitat of indigenous fauna, unless: 1. there is a functional or operational need for the infrastructure to be in that location; 2. it is demonstrated through site, route or method selection, design measures and other management methods how significant adverse effects on the values of the sensitive or significant area have been avoided as far as practicable, and otherwise remedied or mitigated; 3. where there are more than minor adverse effects that cannot be avoided, remedied or mitigated, regard is had to any offsetting or compensation; and 4. Following application of 1. - 3. above, there are no significant adverse effects remaining, (except that this clause

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								shall not apply to the national grid or energy storage facilities associated with the supply of renewable electricity).
Meridian Energy Limited	P26.18	18.19	Infrastructure	Policies	INF-P6	Oppose in Part	Generally supports INF-P6, but considers that nationally significant infrastructure should also be listed in condition 2 of this policy. It is possible that nationally significant infrastructure, that is not otherwise described in the definition of ‘regionally significant infrastructure’ or ‘lifeline utility infrastructure’, may have a functional need or operational need to be located on highly productive land.	Amend INF-P6 as follows: Avoid locating infrastructure on Highly Productive Land, unless: 1. it is small-scale and does not impact the productive capacity of the land; or 2. it is regionally or nationally significant infrastructure or lifeline utility infrastructure and has a functional need or operational need to be located on the highly productive land; and...
Meridian Energy Limited	P26.18	18.20	Infrastructure	Policies	INF-P7	Oppose in Part	Generally supports INF-P7, but considers that nationally significant infrastructure should also be provided the ‘exception’ in this policy. It is possible that nationally significant infrastructure, that is not otherwise described in the definition of ‘regionally significant infrastructure’ or ‘lifeline utility infrastructure’, may have a functional need or operational need to be located in areas of significant indigenous vegetation and significant habitats of indigenous fauna. Further to this, as previously discussed, energy storage facilities must be located within proximity of renewable electricity generation structures and/or transmission infrastructure. Given the national significance of energy storage facilities, and their functional and operational need to be located together with renewable electricity generation structures and/or transmission infrastructure, the same exemption from INF-P7 should be applied to energy storage facilities as is provided to the national grid.	Amend INF-P7 as follows: In addition to INF-P5, avoid new infrastructure (excluding the national grid and energy storage facilities associated with the supply of renewable electricity) that has adverse effects on the following, in an area of significant indigenous vegetation and significant habitats of indigenous fauna: ... 5. a reduction in the population size or occupancy of Threatened or At Risk (declining) species that use significant indigenous vegetation and significant habitats of indigenous fauna for any part of their life cycle, unless it is lifeline utility infrastructure or regionally or nationally significant infrastructure, in which case INF-P5 applies instead, where: 6. the infrastructure provides significant national or regional public benefits; 7. there is a functional need or operational need for the infrastructure to be in that particular location; and 8. there are no practicable alternative locations for the infrastructure outside of an area of significant indigenous vegetation and significant habitats of indigenous fauna.
Meridian Energy Limited	P26.18	18.21	Infrastructure	Rules	INF-R1	Support	Considers that it is appropriate to permit the ongoing operation, maintenance or removal of existing infrastructure.	Retain as notified.
Meridian Energy Limited	P26.18	18.22	Infrastructure	Rules	INF-R2	Support	Considers that it is appropriate to permit upgrading of above ground infrastructure subject to the ‘scale/size’ limits.	Retain as notified.
Meridian Energy Limited	P26.18	18.23	Infrastructure	Rules	INF-R4	Support	Considers that it is appropriate to permit temporary infrastructure.	Retain as notified.
Meridian Energy Limited	P26.18	8.24	Infrastructure	Rules	INF-R6	Support	Considers that it is appropriate to have a ‘catch-all’ permitted activity rule for infrastructure buildings or structures, and accessory buildings to infrastructure, and that it be subject to ‘scale/scale’ conditions.	Retain as notified.
Meridian Energy Limited	P26.18	18.25	Infrastructure	Rules	INF-R7	Support	Considers that it is appropriate to permit below ground infrastructure subject to compliance with INF-S1 and EW-S4.	Retain as notified.
Meridian Energy Limited	P26.18	18.26	Infrastructure	Rules	INF-R18	Support	Considers that it is appropriate to permit network utility operation, infrastructure and electricity generation activities that connects to the National Grid within the National Grid Yard subject to INF-S4.	Retain as notified.
Meridian Energy Limited	P26.18	18.27	Infrastructure	Standards	INF-S4	Support	Considers that INF-S4 is appropriate for managing potential effects in the National Grid Yard.	Retain as notified.

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Meridian Energy Limited	P26.18	18.28	Renewable Electricity Generation	Introduction	Paragraphs 1 - 4	Oppose	Given the profound environmental, economic, social and cultural risks posed by climate change, the need to mitigate these risks through rapid decarbonisation of our economy and communities, and the role of renewable electricity generation in achieving this, Meridian considers these matters are of such strategic importance that they should form the basis of the Introduction to the REG chapter.	<p>Amend paragraphs 1 to 4 of the Renewable Electricity Generation Introduction as follows:</p> <p>This chapter contains District-wide provisions relating to renewable electricity generation activities.</p> <p>Energy efficiency and the use and development of renewable energy are matters the District Plan must have particular regard to under section 7 of the Act. The District Plan must also give effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG), which requires recognition of the national significance of renewable electricity generation.</p> <p>The global climate has changed because of greenhouse gas emissions from human activities, and it will continue to do so in the absence of fast and bold interventions. The effects of human-caused climate change are broad and far-reaching. It is a global issue that affects the physical environment, ecosystems, and human societies. New Zealand is already experiencing increased frequency and intensity of extreme events such as higher temperatures, flooding, droughts, wildfires, increased sea-level rise, and warmer and more acidic oceans. Climate change poses a profound risk to achieving sustainable management of natural and physical resources in New Zealand, including in the Mackenzie District.</p> <p>Key to mitigating climate change is rapid decarbonisation of the economy and its energy systems through renewable electricity generation. The Mackenzie District is synonymous with renewable electricity generation activities such as the nationally significant Waitaki Power Scheme. The national significance of renewable electricity generation is recognised in the National Policy Statement for Renewable Electricity Generation 2011, the National Policy Statement for Freshwater Management 2020 and the National Policy Statement for Indigenous Biodiversity 2023. Together these national policy statements establish a framework to specifically provide for renewable electricity generation and manage the potential effects of such activities that differs from the framework applied to other activities under the Act.</p> <p>The District Plan must give effect to national policy statements.</p> <p>There are significant renewable energy resources located within the District. Part of the nationally significant Waitaki Power Scheme, which is the largest hydro-electric power scheme in New Zealand, is located within the District. The</p>

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								<p>District also contains the Opuha Hydro-electric Power Scheme. There is also increasing interest in solar power generation in the District, due to the high amount of irradiance, particularly in Te Manahuna / the Mackenzie Basin. At a domestic scale, there are renewable electricity options such as solar water heating and solar panels.</p> <p>The NPS-REG directs that the development, operation, maintenance and upgrading of both new and existing renewable electricity generation activities is provided for, in order to increase the proportion of electricity generated from renewable energy sources. These activities often have a functional need or an operational need to be in a particular location or need to locate where the renewable energy resource is available, but can have adverse effects on the environment, particularly in areas which have important natural values or mana whenua values. This chapter provides direction on how renewable electricity generation activities are to be provided for, while appropriately managing the potential adverse effects of these activities.</p> <p>The provisions in other chapters of this District Plan do not apply to activities managed in this chapter, except as follow...</p>
Meridian Energy Limited	P26.18	18.29	Renewable Electricity Generation	Introduction	Paragraph 5	Oppose	<p>Considers that the fifth paragraph is not sufficiently clear to be enforceable. This leaves it unclear what specific provisions do and do not apply to renewable electricity generation activities. Concerning Ecosystems and Indigenous Biodiversity provisions, Meridian understands that for ‘renewable energy generation and transmission’ activities, a consent memorandum has been signed by all parties to appeals on such provisions in MDC’s decisions version of PC18. This consent memorandum leads to the following PC18 provisions applying to the WPS and the Opuha Scheme: Objective, Policies 1, 4, 5, 7 and 8, Rules 2.1.1 and 2.2.1. Contrary to the notified version of the PC26 Renewable Electricity Generation chapter, Meridian considers that Policy 6 of PC18 does not apply to the WPS or the Opuha Scheme since it addresses farming activities and not renewable electricity generation activities. Further, while the title of Rule 1 of PC18 states that the rule does not apply to the WPS and the Opuha Scheme, Meridian considers that the PC26 Renewable Electricity Generation chapter should be explicit that Rules 1.1.1, 1.2.2, 1.3.1 and 1.3.2 of PC18 do not apply to the schemes.</p> <p>For activities on waterbodies, PC19 to the MDP addressed these provisions and they are now operative, and the specific provisions that apply to renewable electricity generation activities can be readily listed in the REG Chapter. For provisions addressing light, Plan Change 22 to the MDP addressed these provisions and they are now operative, and the specific provisions that apply to renewable electricity generation activities can be readily listed in the REG Chapter. Meridian</p>	<p>Amend the 5th paragraph in the Introduction as follows: The provisions in other chapters of this District Plan do not apply to activities managed in this chapter, except as follows:</p> <ul style="list-style-type: none"> •Natural Hazards •Historical Heritage •Notable Trees •Ecosystems and Indigenous Biodiversity, but excluding Policies 2 and 3: •Activities on the Surface of Water •Light •Noise •Signs <p>Concerning the Ecosystems and Indigenous Biodiversity Chapter, the following provisions apply to the Waitaki Power Scheme and the Opuha Scheme: Objective, Policies 1, 3, 4, 5, 7 and 8 Rules 2.1.1 and 2.2.1</p> <p>Concerning activities on waterbodies: a) the following provisions apply to the Waitaki Power Scheme: Rural Objective 8 Rural Policies 8A, 8B, 8F Rural Rules 7A.1.1.d, 7A.1.2.b, 7A.2.1.d b) the following provisions apply to renewable electricity generation activities other than the Waitaki Power Scheme:</p>

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							<p>understands the Natural Hazards, Historical Heritage, Notable Trees, Noise and Signs provisions are part of Stage 4 of the review of the MDP, and that Stage 4 is scheduled for notification in November 2024. In the interim, Meridian considers that the current relevant provisions should be listed in the REG Chapter, and the list of provisions that apply to renewable electricity generation activities should be updated through the 2024 plan changes. Meridian has listed, in its ‘relief sought’, the provisions that it considers apply to REG at this stage in the MDP review process.</p>	<p>Rural Objective 8 Rural Policies 8A, 8B Rural Rules 7A.1.1.a, 7A.1.1.b, 7A.1.2.b, 7A.2.1.a, 7A.2.1.b, 7A.2.1.c, 7A.2.2.a, 7A.2.2.b, 7A.2.3.b, 7A.3.1.a, 7A.3.1.b, 7A.3.3.a, 7A.3.4.b, 7A.4.1.a, 7A.4.1.b, 7A.4.2.a, 7A.4.3.b, 7A.4.4.b</p> <p>Within Part 2 – District Wide Matters, General District-Wide Matters, Light, the following provisions apply to renewable electricity generation activities: Light-O1, Light-P1, Light-P2, Light-R1, Light-R2, Light-R3, Light-R4, Light-S1, Light-S2, Light S3, Light S4, Light-S5, Light-MD1, and Light-MD2Rules 2.1.1 and 2.2.1 Concerning activities on waterbodies: a) the following provisions apply to the Waitaki Power Scheme: Rural Objective 8 Rural Policies 8A, 8B, 8F Rural Rules 7A.1.1.d, 7A.1.2.b, 7A.2.1.d b) the following provisions apply to renewable electricity generation activities other than the Waitaki Power Scheme: Rural Objective 8 Rural Policies 8A, 8B Rural Rules 7A.1.1.a, 7A.1.1.b, 7A.1.2.b, 7A.2.1.a, 7A.2.1.b, 7A.2.1.c, 7A.2.2.a, 7A.2.2.b, 7A.2.3.b, 7A.3.1.a, 7A.3.1.b, 7A.3.3.a, 7A.3.4.b, 7A.4.1.a, 7A.4.1.b, 7A.4.2.a, 7A.4.3.b, 7A.4.4.b</p> <p>Within Part 2 – District Wide Matters, General District-Wide Matters, Light, the following provisions apply to renewable electricity generation activities: Light-O1, Light-P1, Light-P2, Light-R1, Light-R2, Light-R3, Light-R4, Light-S1, Light-S2, Light S3, Light S4, Light-S5, Light-MD1, and Light-MD2</p> <p>Concerning signs, the following provisions of Section 12 – Signs and Aerial Distractions Assessment Matters apply to renewable electricity generation activities: Objective 1 Policies 1A, 1B, 1C Rules 1.a, 1.b, 1.c, 1.d, 1.e, 1.f, 1.g, 2.d, 2.e, 2.f, 3.a, 3.b, 3.c, 3.d, 7.c, 7.d, 7.e and 15.b.</p> <p>Concerning historic heritage and notable trees, the following provisions in Section 11 - Heritage Protection apply to renewable electricity generation activities: Objective 1 Policies 1D Rules 1.a, 2.a, 2.b, 3.a, 4.a, 4.b, 5, 6.a.</p>

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								<p>Concerning natural hazards, the following provisions apply to renewable electricity generation activities:</p> <p>a) ATC-O5; and</p> <p>b) Section 18 – Natural Hazards Objective 1 and Policies 4, 5 and 6.</p> <p>Concerning noise:</p> <p>Rule 15.1.1.h of the Section 7 – General Rural Zone Rules.</p>
Meridian Energy Limited	P26.18	18.30	Renewable Electricity Generation	Introduction	Paragraph 6	Oppose	<p>The sixth paragraph of the REG Introduction states “The provisions in the earthworks chapter do not apply to earthworks which form part of the activities managed in this chapter, except for the construction of new roads or access tracks”.</p> <p>The construction of new roads or access tracks is fundamental to the development and ongoing maintenance of renewable electricity generation activities. The matters of discretion listed in the REG chapter already provides for consideration of earthworks effects. On this basis, Meridian considers that the Earthworks provisions in PC27 should not apply to renewable electricity generation activities.</p>	<p>Delete the sixth paragraph of the Introduction to the REG chapter, as follows:</p> <p>The provisions in the earthworks chapter do not apply to earthworks which form part of the activities managed in this chapter, except for the construction of new roads or access tracks.</p>
Meridian Energy Limited	P26.18	18.31	Renewable Electricity Generation	Objectives	REG-O1	Support	Considers that this objective is generally consistent with the NPS-REG and s7 of the Act.	Retain as notified.
Meridian Energy Limited	P26.18	18.32	Renewable Electricity Generation	Objectives	REG-O2	Oppose in Part	Generally supports the need to manage potential adverse effects that can result from activities in the Mackenzie District. However, Meridian considers that the phrase “are appropriately managed” does not clearly identify what is being aimed for. Meridian considers that the objective needs to be clear enough to provide direction to what the policies then seek to achieve, and it needs to reflect the national direction set in the NPS-REG and Part 2 of the Act.	<p>Amend REG-O2 as follows:</p> <p>The adverse effects of renewable electricity generation activities are appropriately managed while recognising the national significance of renewable electricity generation activities and giving particular regard to the functional and operational needs of such activities.</p>
Meridian Energy Limited	P26.18	18.33	Renewable Electricity Generation	Objectives	REG-O3	NA	Understands that REG-O3 is not within the scope of PC26.	No relief sought.
Meridian Energy Limited	P26.18	18.34	Renewable Electricity Generation	Policies	REG-P1	Support	This objective is generally consistent with the NPS-REG and Part 2 of the Act.	Retain as notified.
Meridian Energy Limited	P26.18	18.35	Renewable Electricity Generation	Policies	REG-P2	NA	REG-P2 is not within the scope of PC26.	No relief sought.
Meridian Energy Limited	P26.18	18.36	Renewable Electricity Generation	Policies	REG-P3	NA	REG-P3 is not within the scope of PC26.	No relief sought.
Meridian Energy Limited	P26.18	18.37	Renewable Electricity Generation	Policies	REG-P4	Oppose in Part	While Meridian supports “investigation and identification of renewable electricity generation sources and small-scale renewable electricity generation activities” being enabled, Meridian considers that the phrase “relative to the sensitivity of the area in which they are located” is not clear enough to be consistently applied in decision making and is not consistent with the NPS-REG. Further to this, the “sensitivity of the area” is reflected in the Introduction to the Renewable Electricity Generation chapter where it identifies other provisions in the MDP that apply to renewable electricity generation activities in addition to the	<p>Amend REG-P4 as follows:</p> <p>Enable investigation and identification of renewable electricity generation sources and small-scale renewable electricity generation activities while managing adverse effects relative to the sensitivity of the area in which they are located.</p>

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							provisions in PC26. For these reasons, Meridian considers that the phrase “relative to the sensitivity of the area in which they are located” is not needed in REG-P4 and should be deleted.	
Meridian Energy Limited	P26.18	18.38	Renewable Electricity Generation	Policies	New Policy		Considers that existing WPS activities need to be specifically enabled in the REG chapter. Meridian understands that REG-P2 is out of the scope of PC26 and therefore is not able to be adjusted through this process, and that REG-P1 focuses on ‘providing’ generally for renewable electricity generation activities and REG-P3 ‘provides for’ the upgrading, maintenance, and enhancement of existing elements of the WPS in Lakeside Protection Areas. This leaves a gap with respect to ‘enabling’ the operation, maintenance and upgrade of the WPS.	Insert new policy as follows: REG-P1A – Waitaki Power Scheme <i>Enable the operation, maintenance, and upgrade of the Waitaki Power Scheme.</i>
Meridian Energy Limited	P26.18	18.39	Renewable Electricity Generation	Policies	REG-P5	Oppose in Part	<p>Considers that REG-P5 is not consistent with Policies C1 and C2 of the NPS-REG. It is not clear what is meant by “minimising other effects” in REG-P5, and the NPS-REG does not require this. Also, unlike REG-P5, Policy C2 of the NPS-REG leads to offsetting and compensation only being had regard to when considering residual adverse effects after avoiding, remedying or mitigating adverse effects.</p> <p>The definition of Functional needs in PC26 (and the National Planning Standards) reads “means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment” [emphasis has been added] and is narrower than Policy C1(a) of the NPS-REG which requires that particular regard be had to “the need to locate the renewable electricity generation activity where the renewable energy resource is available”. Meridian is concerned that inclusion of “functional needs” in REG-P5(4) is unnecessarily restrictive in areas outside of those listed in REG-P6. Meridian seeks amendments to better align with Policy C1(a) of the NPS-REG. The exclusions to REG-P5 need to extend to include new policy REG-P1A, REG-P2 and REG-P3 activities as well as REG-P4 activities.</p> <p>Meridian also considers that REG-P5 should be enabling the activities listed in the policy (e.g. through permitted or controlled activity status in the rules). The REG-P5 activities are not in areas of significant indigenous vegetation and significant habitats of indigenous fauna, ONLs, ONFs, riparian areas and SASM or on highly production land (because such activities are addressed in REG-P6), and accordingly the conditions of a permitted or controlled activity rule can be readily applied to manage potential adverse effects without the need to apply discretion to the granting of a consent (or otherwise).</p>	<p>Amend REG-P5 as follows: Provide forEnable renewable electricity generation activities (not otherwise specified enabled or provided for in REG-P1A, REG-P2, REG-P3 and REG-P4), while managing adverse effects by:</p> <p>1. avoiding, remedying or mitigating significant adverse effects as far as practicable; and 2. minimising other effects; 32. where significant residual adverse effects remain, having regard to any offsetting measures and /or environmental compensation measures promoted by the applicant proposed; and 43. having particular regard to the practical constraints associated with renewable electricity generation activities, including: a. functional needs and the operational needs of renewable electricity generation activities; and b. the need to locate activity where the renewable energy resource is available; and bc. the location and efficient use of existing electricity generation, transmission and distribution infrastructure.</p>
Meridian Energy Limited	P26.18	18.40	Renewable Electricity Generation	Policies	REG-P6	Oppose in Part	Considers that the exclusions to REG-P6 need to extend to include REG-1A, REG-P2, REG-P3 and REG-P5 activities as well as REG-P4 activities; and condition 4 needs to be amended to be specific to offsetting and compensation measures that are promoted by the applicant. Considers that condition 5 should be deleted since national direction does not require this approach at this point in time. For example, the NPSIB explicitly does not apply to REG assets and activities, and there is direction in the NPSREG to increase REG in NZ.	Amend P6 as follows: Provide for renewable electricity generation activities (not otherwise specified enabled or provided for in REG-P1A, REG-P2, REG-P3 and REG-P4) within areas of significant indigenous vegetation and significant habitats of indigenous fauna, Outstanding Natural Landscapes, Outstanding Natural Features, Sites and Areas of Significance to Māori, riparian areas, or within area of Highly Productive Land, where:

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							Meridian considers a consenting pathway should exist for renewable electricity generation activities that allows the merits or otherwise of a proposed activity to be considered on a case-by-case basis under the national policy direction at the time.	1. there is a functional need or an operational need for the activity to be in that location or there is a need to locate the activity where the renewable energy resource is available; 2. adverse effects on the values of the area are avoided as far as practicable, including through site, route or method selection, design measures and other management methods; 3. adverse effects that cannot be avoided are remedied or mitigated, where practicable; and 4. regard is had to any offsetting measures or environmental compensation promoted by the applicant , where there are significant residual adverse effects that cannot be avoided, remedied or mitigated; and 5. following application of 1. - 4. above, there are no significant adverse effects remaining.
Meridian Energy Limited	P26.18	18.41	Renewable Electricity Generation	Rules	REG-R1	Support	Supports permitting the operation and maintenance of existing hydroelectric power stations and associated structures in all zones. This reflects the national significance of existing hydroelectric power schemes, the scale of investment in these schemes and the nature of potential effects of such activities.	Retain REG-R1 as notified.
Meridian Energy Limited	P26.18	18.42	Renewable Electricity Generation	Rules	REG-R2	Oppose in Part	Supports permitting upgrading of an existing hydroelectric power station and associated structures associated with the Opuha Scheme, or within the existing footprint or core sites of the WPS. This reflects the national significance of existing hydroelectric power schemes, the scale of investment in these schemes and the nature of potential effects of such activities. However, Meridian considers that there is a grammar error in the Rule.	Amend REG-R2 as follows: Upgrade of an existing hydroelectric power station and associated structures associated with the Opuha Scheme, or within the existing footprint or core sites of the Waitaki Power Scheme.
Meridian Energy Limited	P26.18	18.43	Renewable Electricity Generation	Rules	REG-R3	Oppose in Part	Meridian supports permitting the upgrading of an existing structure within an operating easement of the WPS where any modification or addition does not result in more than 20m ² of additional land being utilised for buildings, structures and ancillary activities, or the height of any existing building being increased by more than 2.5 metres. Meridian also supports the controlled activity status that applies when the area and height restriction cannot be met. However, Meridian considers that REG-MD1(b) of the matters over which control is reserved should not apply to the activity. This reflects that PC18 manages the potential effects of existing renewable electricity generation activities in areas of indigenous vegetation and habitats of indigenous fauna, and that the NPSIB does not apply to renewable electricity generation activities.	Amend REG-R3 as follows: ...Activity status when compliance is not achieved with R3.1: CON Matters over which control are reserved: REG-MD1 Existing Hydroelectric Power, except that matter REG-MD1(b) does not apply to this activity.
Meridian Energy Limited	P26.18	18.44	Renewable Electricity Generation	Rules	REG-R4	Oppose in Part	Meridian supports the development of new renewable electricity generation activities associated with an existing hydroelectric power station, including associated structures being a controlled activity where the development will not result in an increase in the maximum operating level of a lake or water storage area authorised at the date this rule was notified, or create a new lake or water storage area. Meridian supports the restricted discretionary activity status that applies if the maximum operating level is increased or a new lake or storage area is created. However, Meridian considers that the matters of discretion in REG-	Retain REG-R4 as notified while at the same time deleting REG-MD2(i).

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							MD2 should be amended to delete i. since matters c. and e. address the same effect as i.	
Meridian Energy Limited	P26.18	18.45	Renewable Electricity Generation	Rules	REG-R5	Oppose in Part	<p>Supports permitting investigation, identification and assessment activities in Scenic Viewing Areas, Scenic Grasslands, Lakeside Protection Areas, Māori Rock Art Protection Areas and Silent File Areas provided the activity is located on site for no more than 60 months and any structure does not exceed 1.8m in height and 6m in footprint (excluding any anemometer mast, weather stations, lightning rods, antennas, earth peak or GPS unit and their associated mounting structures). Also supports the restricted discretionary activity status that applies when the conditions of the permitted activity cannot be met. However, Meridian considers that REG-MD3(d) is not consistent with Policy C2 of the NPS-REG and seeks relief to ensure consistency with the national policy direction. Meridian also considers that replacing “proposed” with “promoted by the applicant” removes potential ambiguity in the provision.</p> <p>In areas other than Scenic Viewing Areas, Scenic Grasslands, Lakeside Protection Areas, Māori Rock Art Protection Areas and Silent File Areas, Meridian supports permitting investigation, identification and assessment activities provided the activity is located on site for no more than 60 months and any structure is set back from the road boundary, or internal boundary of any site in separate ownership, the equivalent distance to the height of the structure. Meridian also supports restricted discretionary activity status that applies when the conditions of the permitted activity cannot be met and generally supports the associated matters of discretion.</p>	Retain REG-R5 as notified while amending REG-MD3(d) as follows: d. The effectiveness of any proposed offsetting or compensation measures promoted by the applicant when any significant residual effects cannot be avoided, remedied or mitigated.
Meridian Energy Limited	P26.18	18.46	Renewable Electricity Generation	Rules	REG-R7	Oppose in Part	Supports any renewable electricity generation activities not otherwise listed in REG-R1 to REG-R6 being a discretionary activity in areas of significant indigenous vegetation or significant habitat of indigenous fauna, Outstanding Natural Landscape, Outstanding Natural Feature, Sites and Areas of Significance to Māori, a setback distance specified in Table NATC-1, or on Highly Productive Land. Also supports such activities being a restricted discretionary activity in areas other than those listed above. However, Meridian considers that REG-MD4(b) is not consistent with Policy C2 of the NPS-REG and seeks relief to ensure consistency with the national policy direction. Meridian also considers that replacing “proposed” with “promoted by the applicant” removes potential ambiguity in the provision.	Retain REG-R7 as notified while amending REG-MD4(b) as follows: b. The effectiveness of any proposed offsetting or compensation measures promoted by the applicant when any significant residual effects cannot be avoided, remedied or mitigated.
Meridian Energy Limited	P26.18	18.47	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD2(i)	Oppose	Considers that the matters of discretion in REG-MD2 should be amended to delete i. since matters c. and e. address the same effect as i.	Delete REG-MED2(i).
Meridian Energy Limited	P26.18	18.48	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD3(d)	Oppose in Part	Considers that REG-MD3(d) is not consistent with Policy C2 of the NPS-REG. Meridian also considers that replacing “proposed” with “promoted by the applicant” removes potential ambiguity in the provision.	As discussed in other submission point, amend REG-MD3(d) as follows: d. The effectiveness of any proposed offsetting or compensation measures promoted by the applicant when any significant residual effects cannot be avoided, remedied, or mitigated.

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Meridian Energy Limited	P26.18	18.49	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD4(b)	Oppose in Part	Considers that REG-MD4(b) is not consistent with Policy C2 of the NPS-REG. Meridian also considers that replacing “proposed” with “promoted by the applicant” removes potential ambiguity in the provision.	As discussed in other submission point, amend REG-MD4(b) as follows: b. The effectiveness of any proposed offsetting or compensation measures promoted by the applicant when any significant residual effects cannot be avoided, remedied, or mitigated.
Meridian Energy Limited	P26.18	18.50	Renewable Electricity Generation	Matters of Control or Discretion	REG-MD4(c)	Oppose in Part	The definition of Functional needs in PC26 (and the National Planning Standards) reads “means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment” [emphasis has been added] and is narrower than Policy C1(a) of the NPSREG which requires that particular regard be had to “the need to locate the renewable electricity generation activity where the renewable energy resource is available”. Meridian is concerned that inclusion of “functional needs” in REG-MD4(c) is unnecessarily restrictive in areas outside of those specified in REG-R7. Meridian seeks amendments to better align with Policy C1(a) of the NPSREG.	Amend REG-MD4(c) as follows: The functional needs and operational needs of the activity and the need to locate renewable electricity generation activities where the renewable energy resource is available.
Meridian Energy Limited	P26.18	18.51	Section 7 Operative District Plan	Rules and Schedule	Deletion of Schedule A and Rules 13.1.1, 13.2.1 and 13.3.1	Support	Supports the deletion of Schedule A, and rules 13.1.1, 13.2.1 and 13.3.1, and assessment matter 16.3.j in Section 7 of the operative MDP, subject to adoption of the relief sought in this table.	Subject to adoption of the relief sought in this table, retain the deletion of Schedule A of Section 7 and rules 13.1.1, 13.2.1 and 13.3.1, and assessment matter 16.3.j in Section 7 of the MDP as notified.
Canterbury Regional Council	P26.19	19.01	Interpretation	Definitions	Antenna	Support in Part	For consistency with national direction, use the definition from the NESTF.	Delete the definition and replace with: A device that receives or transmits radiocommunication or telecommunication signals, but not a small cell unit. (National Environmental Standards for Telecommunication Facilities Definition)
Canterbury Regional Council	P26.19	19.02	Interpretation	Definitions	National Grid	Support in Part	For consistency with national direction, use the NPSREG definition.	Delete the definition and replace with: The lines and associated equipment used or owned by Transpower to convey electricity. (National Policy Statement for Renewable Energy Generation Definition)
Canterbury Regional Council	P26.19	19.03	Interpretation	Definitions	Regionally Significant Infrastructure	Support in Part	Uses the CRPS definition but is incomplete, and most importantly leaves out point 6. Renewable energy generation activities.	Amend the definition: ...h. electricity distribution network i. National, regional and local renewable electricity generation activities of any scale
Canterbury Regional Council	P26.19	19.04	Interpretation	Definitions	Transmission Lines	Support in Part	This definition is sourced from the NESETA, but the source has not been acknowledged.	Add note to definition: (National Environmental Standards for Electricity Transmission Activities Definition)
Canterbury Regional Council	P26.19	19.05	Infrastructure	Entire Chapter		Neutral	Does not request any changes to the proposed INF Chapter.	No change sought.
Canterbury Regional Council	P26.19	19.06	Renewable Electricity Generation	Rules	REG-R2	Support in Part	Core sites of the Waitaki Power Scheme (WPS) have not been defined. This could be an issue if upgrades are carried out without resource consent to WPS sites that Mackenzie District Council do not consider to be core sites.	Add a definition: Core sites of the Waitaki Power Scheme are: Then list the sites MDC consider to be core sites.
Canterbury Regional Council	P26.19	19.07	Renewable Electricity Generation	Rules	REG-R7	Support in Part	Seeks further clarity on how the Chapter 19 policies and rules apply to an application progressed under REG-R7, to ensure that the relevant provisions regarding indigenous biodiversity are properly considered	REG-MD4 ... b. The effectiveness of any proposed offsetting or

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							as part of any such application. As the provisions are drafted currently, it is unclear whether an application made under REG-R7 would be expected to apply the offsetting and compensation principles in policies in Chapter 19.	compensation measures, in accordance with the provisions of Section 19 (Ecosystem and Indigenous Biodiversity) .
Grampians Station Limited	P26.21	21.01	Interpretation	Definitions	Investigation Activities	Support	Gives effect to NPS-REG.	Retain as notified.
Grampians Station Limited	P26.21	21.02	Interpretation	Definitions	Regionally Significant Infrastructure	Support	Gives effect to NPS-REG.	Retain as notified.
Grampians Station Limited	P26.21	21.03	Interpretation	Definitions	Small-Scale Renewable Electricity Generation Activity	Support		Retain as notified.
Grampians Station Limited	P26.21	21.04	Interpretation	Definitions	Temporary Infrastructure	Support		Retain as notified.
Grampians Station Limited	P26.21	21.05	Interpretation	Definitions	Upgrade	Support	Gives effect to NPS-REG.	Retain as notified.
Grampians Station Limited	P26.21	21.06	Infrastructure	Introduction		Support	Gives effect to NPS-REG.	
Grampians Station Limited	P26.21	21.07	Infrastructure	Policies	INF-P1 - INF-P5	Support	Gives effect to NPS-REG.	
Grampians Station Limited	P26.21	21.08	Infrastructure	Policies	INF-P6	Oppose in Part	To require no impact on the productive capacity of the land is unduly restrictive. In submission on PC23, Grampians Station Limited as opposed the classification of those parts of the land that it farms as Class 3 Highly Productive Land and has sought the removal of the HPL Overlay from these areas. The Government has stated its policy to remove the Class 3 category from the NPS.	Amend Policy to read: Avoid locating infrastructure on Class 1 and Class 2 Highly Productive Land... or Amend Policy to read: Avoid locating infrastructure on Highly Productive Land, unless; 1. it will have no more than a minor impact on the productive capacity of the land; 2. Changes in farm system and management will maintain the productive capacity of the land ; or 3. It is regionally significant...
Grampians Station Limited	P26.21	21.09	Infrastructure	Policies	INF-P7	Support		Retain as notified.
Grampians Station Limited	P26.21	21.10	Infrastructure	Rules	INF-R4	Oppose in Part	Period of time specified for permitted activity is too short.	Extend time period for Permitted activity to 36 months.
Grampians Station Limited	P26.21	21.11	Infrastructure	Rules	INF-R6 - R11	Support		Retain as notified.
Grampians Station Limited	P26.21	21.12	Infrastructure	Rules	INFR17-INF 23	Support		Retain as notified.
Grampians Station Limited	P26.21	21.13	Infrastructure	Rules	INFR28-R30	Support		Retain as notified.
Grampians Station Limited	P26.21	21.14	Infrastructure	Standards	INF-S3	Support		Retain as notified.
Grampians Station Limited	P26.21	21.15	Renewable Electricity Generation	Introduction		Support	Grampians Station Limited is supportive of the Council giving effect to the National Policy Statement - Renewable Energy Generation and	Retain as notified.

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							recognising the particular natural attributes of the District that make REG development viable and appropriate.	
Grampians Station Limited	P26.21	21.16	Renewable Electricity Generation	Objectives	REG-O1	Oppose in Part	The aim should be to increase output from REG activities in the District not just maintain it.	Amend the objective to read: The output from renewable electricity generation activities in the District for national, regional and local us is maintained or increased.
Grampians Station Limited	P26.21	21.17	Renewable Electricity Generation	Policies	REG-P4 - P6	Support	Gives effect to NPS-REG.	Retain as notified.
Grampians Station Limited	P26.21	21.18	Renewable Electricity Generation	Rules	REG-R5	Support	Gives effect to NPS-REG.	Retain as notified.
Grampians Station Limited	P26.21	21.19	Renewable Electricity Generation	Rules	REG-R6	Support		Retain as notified.
New Zealand Defence Force*	PC26.22	22.01	Interpretation	Definitions	Infrastructure	Amend	Defence facilities such as the Tekapo Military Training Camp are regionally and nationally significant infrastructure and NZDF requests that they are recognised as such in the definition of infrastructure in PC26. While the RMA definition is currently relied on, this does not preclude additions to that definition where it is appropriate for that particular district or region.	Add 'defence facilities' to the definition of infrastructure.
New Zealand Defence Force*	PC26.22	22.02	Interpretation	Definitions	Regionally Significant Infrastructure	Amend	As noted above, defence facilities such as the Tekapo Military Training Camp are regionally (and nationally) significant infrastructure. NZDF requests that they are recognised as such in the definition of infrastructure in PC26.	Add 'defence facilities' or 'the Tekapo Military Training Camp' to the definition of regionally significant infrastructure.
New Zealand Defence Force*	PC26.22	22.03	Interpretation	Definitions	Temporary Infrastructure	Support	NZDF supports the inclusion of a definition of temporary infrastructure and considers that this is a helpful and pragmatic approach.	Retain as notified.
New Zealand Defence Force*	PC26.22	22.04	Infrastructure	Introduction		Support in Part	This chapter is intended to address infrastructure as defined by Section 2 of the RMA, and presumably regionally significant infrastructure as defined through PC 26. This should be confirmed through the introduction. The exceptions set out in the introduction, i.e.. that other than the chapters identified the other chapters in the District Plan do not apply, is supported.	Amend introduction to clarify that this chapter applies to infrastructure, including regionally significant infrastructure. Retain the exceptions set out in the introduction which clarify the application of other chapters to infrastructure.
New Zealand Defence Force*	PC26.22	22.05	Infrastructure	Objectives and Policies	INF-O1 - INF-03, INF-P1, INF-P2, INF-P4, INF-P5 - INF-P7	Support	NZDF support the policy framework which includes provision of infrastructure and managing adverse effects on infrastructure.	Retain as notified.
New Zealand Defence Force*	PC26.22	22.06	Infrastructure	Rules	INF-R1, INF-R2, INF-R4, INF-R6	Support	NZDF supports the inclusion of a permitted activity for temporary infrastructure. As part of NZDF's training activities (TMTA), temporary infrastructure is sometimes required.	Retain as notified.
Ant Frith	PC26.23	22.07	Renewable Electricity Generation			Oppose in Part	Provision should be made for renewable energy sources. The high country is blessed with many streams and elevation. Provision should be made for mini hydro schemes. This by nature requires the removal of vegetation and works in a water course and earthworks for piping. Balance needs to be give to long term benefits of renewable vs the short visual effects of the activity to establish. It is not reasonable to require a consent applicant to incur consenting costs far greater than the value of the work or benefit.	Solar panels on roofs or out of sight on roads and public places should be permitted. Provision should be made for mini hydro schemes to enable the powering of properties and to feed excess power into the grid.

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* 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)