

**FORM 6: FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON NOTIFIED PROPOSED PLAN**

(in accordance with clause 8, Schedule 1, Resource Management Act 1991)

TO: Mackenzie District Council

SUBMISSION ON: Plan Changes 23 – 27 of the Mackenzie District Plan Review

NAME OF SUBMITTER: Nova Energy Limited (**Nova**)

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Introduction

This is a further submission in support, and opposition (as provided in the table **attached** to this form) submissions on the proposed plan (the **proposal**).

Nova has an interest in the proposal that is greater than the interest the general public has, which are outlined in its original submissions on the proposal, dated 24 January 2024.

Further Submissions

Nova's position on the original submissions for PCs 23 – 27 are set out in the table **attached** to this form, which includes the particular parts of the original submissions that it supports or opposes the reasons for its support or opposition (as applicable) and the relief it seeks as a result.

Hearing

Nova wishes to be heard in support of its further submission. If others make a similar submission. It will consider presenting a joint case with them at hearing.



Authorised signatory for Nova Energy Limited

Date: 1 March 2024

Email: cpte@novaenergy.co.nz

Nova Energy further submission on Plan Changes 23, 26 and 27, by submitter

I support/oppose the submission of:	The particular part of the submission I support/oppose are:				The reasons for my support / opposition are:	I seek that the whole (or part) of the submission be allowed / disallowed:
Canterbury Regional Council						
Canterbury Regional Council	P26.19	19.03	Definitions	Support	Aligns with Nova Energy's submission (refer to point P26.06 / 6.06 / Definitions).	Whole submission is allowed
Director General of Conservation						
Director-General of Conservation	PC23.07	7.12	Rules, Standards and Matters of Discretion	Oppose	The rules, standards and matters of discretion are considered appropriate as they are supported by the Section 32 report.	Whole submission is disallowed
Director General of Conservation	PC26.03	3.02	Definitions	Support	Aligns with Nova Energy's submission (refer to point P26.06 / 6.06 / Definitions).	Whole submission is allowed
Director General of Conservation		3.04	Policies	Oppose	An assessment of environmental effects for an infrastructure development considers the scope and extent of effects specific to that development, therefore INF-P4 is considered appropriate as drafted.	Whole submission is disallowed
Director General of Conservation	PC26.03	3.05	Policies	Oppose	We consider that policy INF-P5 provides an appropriate effects management hierarchy and no amendments are required to the proposed draft.	Whole submission is disallowed
Director General of Conservation		3.07	Entire Chapter	Oppose	Excluding Policies 2 and 3 of Section 19 Ecosystem and Indigenous Biodiversity, as drafted in the Renewable Electricity Generation Chapter, is considered appropriate.	Whole submission is disallowed
Director-General of Conservation	PC27.07	7.08	Objectives	Oppose	The addition of "natural values" in EW-O1 is considered unnecessary as the Strategic Direction, particularly NE – Natural Environment, reflects the "values of the natural environment" across the district.	Whole submission is disallowed
Director-General of Conservation	PC27.07	7.09	Rules and Standards	Oppose	Reviewing the rules and standards in the specific Earthworks chapter, with respect to the management of silt and sediment loss is considered unnecessary as silt and sediment loss from earthworks is managed through conditions of consent, under approved management plans.	Whole submission is disallowed
Environmental Defence Society						
Environmental Defence Society Incorporated	P26.10	10.01	Policies	Oppose	Although a cross reference to INF-P5 is included in INF-P7, policy INF-P5 is a standalone policy regarding Infrastructure in Sensitive or Significant Areas and the requirements in INF-P7 do not apply to INF-P5.	Whole submission is disallowed

Royal Forest and Bird Protection Society of New Zealand Inc	PC23.36	36.01	Definitions	Oppose	The plan change states that the proposed District Plan Earthworks definition does not apply to Plan Changes 23, 24, 25, 26 and 27 (as per Part 1 – Introduction and General Provisions / Interpretation Definitions). The proposed Earthworks definition for Plan Changes 23 – 27 is considered appropriate, as it reflects the National Planning Standard definition.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	PC23.36	36.11	Objectives	Oppose	This proposed amendment GRUZ-O2 is considered unnecessary as the Strategic Direction, particularly NE – Natural Environment, reflects the “values of the natural environment” across the district.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.01	Introduction	Oppose	Excluding Policies 2 and 3 of Section 19 Ecosystem and Indigenous Biodiversity, as drafted in the Renewable Electricity Generation Chapter, is considered appropriate. The Introduction of the Renewable Electricity Generation Chapter is suitable as drafted and does not require specific references to NFL, NATC and Zone Chapters, as these are addressed within the provisions of the Infrastructure Chapter, where applicable.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.03	Objectives	Oppose	REG-O2 is considered suitable as drafted and ensures that effects are appropriately managed.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.05	Policies	Oppose	REG-P4 is suitable as drafted and requires the management of “adverse effects relative to the sensitivity of the or the area in which they are located”. Solar electricity generation in the Mackenzie Basin should not be “limited to that which can be placed on existing lawfully established buildings”, as this limits the use of the renewable electricity generation resources in the district, as recognised in the Strategic Chapters, and fails to give effect to the NPS-REG. Wind electricity generation in the Mackenzie Basin should not be “limited to small and community scale activities”. If suitable wind energy resource exists an avenue for consent consideration should be provided to give effect to the NPS-REG.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.06	Policies	Oppose	The proposed effects management hierarchy in REG-P5 is suitable as drafted, particularly when read in conjunction with the matters of discretion in Clause 1.2.5 of Section 19 Ecosystem and Indigenous Biodiversity.	Whole submission is disallowed

Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.07	Policies	Oppose	The proposed effects management hierarchy in REG-P6 is suitable as drafted, particularly when read in conjunction with the matters of discretion in Clause 1.2.5 of Section 19 Ecosystem and Indigenous Biodiversity.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.12	Rules	Oppose	A time frame of 60 months as drafted in REG-R5 provides a suitable window for investigation activities. The Activity Status of PER and RDIS as drafted in REG-R5 are suitable controls to ensure the appropriateness of measures to avoid, remedy or mitigate adverse effects.	Whole submission is disallowed
Royal Forest and Bird Protection Society of New Zealand Inc	P26.13	13.14	Rules	Oppose	The proposed Activity Status of RDIS and DIS as drafted in REG-R7 are considered appropriate as it enables development applications to be considered by the Decision Maker, weighing the Assessment of Environmental Effects against the matters of discretion in REG-MD4, to ensure the “appropriateness of measures to avoid, remedy or mitigate adverse effects”.	Whole submission is disallowed
Te Rūnanga o Ngāi Tahu						
Te Rūnanga o Ngāi Tahu	P26.12	12.17	Policies and Rules	Oppose	The proposed Activity Status of RDIS and DIS as drafted in REG-R7 are considered appropriate as it enables development applications to be considered by the Decision Maker, weighing the Assessment of Environmental Effects against the matters of discretion in REG-MD4, to ensure the “appropriateness of measures to avoid, remedy or mitigate adverse effects”.	Whole submission is disallowed
Transpower						
Transpower New Zealand Limited	P26.07	7.05	Definitions	Oppose	The term National Grid is too narrow to include other significant electricity transmission network infrastructure.	Whole submission is disallowed.