



Submission by Genesis Energy Limited

Trading as Genesis

ON

Mackenzie District Plan Review – Stage 3
Proposed Plan Change 24
Sites and Areas of Significance to Māori

26 January 2024

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Mackenzie District Plan Review – Stage 3 Proposed Plan Change 24 Sites and Areas of Significance to Māori

To: Mackenzie District Council

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Date: 26 January 2024

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1. Introduction

Genesis Energy Limited (**Genesis**) welcomes the opportunity to submit on the Proposed Plan Change 24 (**PC24**) relating to the Sites and Areas of Significance to Māori Chapter in the Mackenzie District Plan.

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

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

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

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

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

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

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

Nāku noa, nā



Karen Sky

Group Manager Environment and Community

2. Genesis Energy Limited – specific submission points on Plan Change 24 (Sites and Areas of Significance to Māori Chapter)

Sub Point	Provision Number	Position	Reasons for submission	Relief sought
Definitions				
1.	Earthworks	Support	The definition of “ <i>earthworks</i> ” is supported	Retain the definition of “ <i>earthworks</i> ” as notified.
2.	Functional Need	Support	The definition of “ <i>functional need</i> ” is supported	Retain the definition of “ <i>functional need</i> ” as notified.
3.	Infrastructure	Oppose	<p>Infrastructure is included in the list of definitions associated with PC24, however is not marked as being subject to a plan change.</p> <p>“<i>Infrastructure</i>” is included in the list of definitions associated with PC24, 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 “<i>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</i>”. While Genesis consider 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.</p>	<p>Amend the definition of “<i>infrastructure</i>” as follows:</p> <p><i>Has the same meaning as in section 2 of the RMA, <u>with an added reference to energy storage</u>, (as set out below)</i></p> <p><i>Means —</i></p> <p>...</p> <p><i>(d) facilities for the generation of electricity, <u>energy storage</u>, 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—</i></p> <p>...</p> <p>Alternatively, if the definition of Infrastructure is not amended, then all provisions in all of PC23, PC24, PC25, PC26 and PC27 that refer to “<i>Infrastructure</i>” should be amended to refer to “<i>Infrastructure <u>and energy storage facilities</u></i>”.</p>
4.	Operational need	Support	Genesis notes that the definition of “ <i>Operational need</i> ” 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	Retain the definition of “ <i>operational need</i> ” as notified and apply it throughout the plan.

Sub Point	Provision Number	Position	Reasons for submission	Relief sought
			used in those chapters. On this basis, the definition of “ <i>operational need</i> ” is supported and should be applied throughout the plan.	
SASM – Sites and Areas of Significance to Māori Chapter				
5.	Introduction	Support in part	<p>The introduction to the SASM chapter notes that other chapters within the plan manage activities that are located within SASM. In particular, the introduction notes that chapters including the “<i>Natural Character, Natural Features and Landscapes, Public Access and Earthworks chapters which manage activities that occur in SASM, and where an activity is proposed within a SASM which requires resource consent under those chapters, the objectives, policies and matters of discretion in this chapter may also be relevant to consideration of that activity</i>”.</p> <p>The Renewable Electricity Generation Chapter does not identify the SASM chapter as applicable to the management of renewable electricity generation activities, however does identify “Historical Heritage”. Historical Heritage is identified as a topic to be reviewed as part of the Stage Four District Plan reviews. It is unclear whether this historical heritage as referenced in the REG chapter includes SASM, and therefore whether (with the exception of earthworks associated with the construction of new roads or access tracks) the SASM chapter does or does not apply to renewable electricity generation activities and this should be made clear in the introduction to this chapter.</p>	<p>Amend the Introduction as follows:</p> <p>...</p> <p><i>This chapter is not the only chapter in the District Plan which manages activities that are located within SASM and should be read alongside other sections of the District Plan which also consider the effects on SASM. In particular, it should be noted that there are rules in other chapters, including the Natural Character, Natural Features and Landscapes, Public Access and Earthworks chapters which manage activities that occur in SASM, and where an activity is proposed within a SASM which requires resource consent under those chapters, the objectives, policies and matters of discretion in this chapter may also be relevant to consideration of that activity.</i></p> <p><u><i>The provisions of this chapter do not apply to renewable electricity generation activities which are managed under the Renewable Electricity Generation Chapter.</i></u></p>