

**FURTHER SUBMISSIONS IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON
PC20 OF THE MACKENZIE DISTRICT PLAN REVIEW**

Clause 8 of Schedule 1 Resource Management Act 1991

To: Mackenzie District Council

Submission on: Plan Change 20 of the Mackenzie District Plan Review

Name of further submitter: Nova Energy Limited

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Introduction

- 1 This is a further submission on Proposed Plan Change 20 of the Mackenzie District Plan (PC20) by Nova Energy Limited (Nova).
- 2 Nova is a party that has an interest in the proposed plan change that is greater than the interest of the general public, as it is a submitter on Proposed Plan Change 20 and has land ownership and development interests in the Mackenzie District.
- 3 Please refer to **Appendix 1** for the details of Nova's further submission.
- 4 Nova wishes to be heard in support of this further submission.
- 5 If others make a similar submission, Nova would be prepared to consider presenting a joint case with them at the hearing.

Date: 3 October 2022



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S F Quinn / M J Dicken
Counsel for Nova Energy Limited

Appendix 1 – Further submissions by Nova Energy Limited

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
1	New Zealand Pork	Support	Retain introduction to Chapter: ATC-A Thriving Community as notified.	Nova acknowledges that the district is predominantly rural but considers that energy resources and new and existing infrastructure are central to the identity of the district.	Whole submission is allowed.
		Support	Amend Strategic Objective UFD-O1 to include a sixth clause.	Nova supports the addition of a sixth clause as it provides clarity to rural and urban boundary matters and provides for appropriate development and its integration with the environment, whilst protecting existing uses from reverse sensitivity.	Whole submission is allowed.
2	Heritage New Zealand	Oppose	Addition of an objective to promote the identification, recognition and protection of places, structures and features which are significant to Mackenzie’s wider character and cultural heritage.	Nova acknowledges the significance of historic heritage within the district but submits that the relief sought in the submission is better achieved through the Historic Heritage Chapter which is to be reviewed at a later stage.	Whole submission disallowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
4	Chorus, Spark and Vodafone	Oppose	Retain Strategic Objective ATC-O3 as notified.	Nova considers it is important that ATC-O3 is amended so that the proposed plan recognises and enables ‘ <i>appropriate</i> ’ future development so that there is provision for new energy facilities and infrastructure where appropriate.	Whole submission disallowed.
5	Forest and Bird	Support	Amend Part 2 Section: Strategic Directions, Introduction.	Nova support the amendment proposed as it provides greater clarity as to how the strategic objectives are to be interpreted with regard to the rest of the plan.	Whole submission is allowed.
		Support in part	Retain Strategic Objective ATC-O1 to ATC-O5 as notified.	Nova support the retention of Objectives ATC-O1, ATC-O2 and ATC-O5 but considers it important that ATC-O3 and ATC-O4 are amended to recognise and enable ‘ <i>appropriate</i> ’ future development so that there is provision for new energy facilities and infrastructure where appropriate.	Part of submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
		Oppose	Amend wording to the introduction of Chapter: NE – Natural Environment, as well as the inclusion of an additional paragraph.	<p>Nova opposes the proposed amendment as it overreaches by differentiating significance of resources and biodiversity.</p> <p>Nova states that the proposed NE – Introduction (paragraph 1, sentence 2) could specifically include “<i>renewable energy resources</i>” or “<i>sources of renewable energy</i>” as natural resources of significance and be added to Strategic Objective NE-01. This would be in accordance with Nova's submission, supporting in part NE-01, particularly that provision for infrastructure development needs to be balanced in consideration with its integrations into existing environments.</p>	Whole submission is disallowed.
		Support in part	Amend objective NE-O1 by separating it into two objectives.	<p>Nova supports the relief sought in so far as it does not impede the importance of appropriate future development of infrastructure.</p> <p>Provision for infrastructure</p>	Part of submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
				development ought to be balanced in consideration with its integration into existing environments	
		Support	Amend with the addition of a sixth clause to Strategic Objective UFD-O1.	Nova supports the recognition of indigenous biodiversity, particularly in light of the NPS on Indigenous Biodiversity which is to be published in December 2022.	Whole submission is allowed.
6	Federated Farmers	Support	Within Part One, Section: How the Plan Works, Chapter: Statutory Context, amend wording in the table summarising RMA provisions, section 31.	Amended wording provides clarity.	Whole submission is allowed.
7	Genesis Energy Ltd	Support	Amend the paragraph four of the introduction to Chapter: ATC - A Thriving Community and add a fifth paragraph.	Nova supports the relief sought as it provides recognises and enables existing and future development, particularly so that there is provision for new energy facilities and infrastructure.	Whole submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
		Oppose in part	Retain Strategic Objective ATC-O3 as notified.	Nova considers it important that ATC-O3 is amended to recognise and enable ‘appropriate’ existing and future development so that there is provision for new energy facilities and infrastructure where appropriate.	Part of submission is allowed.
		Oppose in part	Replace Strategic Objective ATC-O4 to provide reference to the Waitaki Power Scheme.	<p>Nova considers that all locally, regionally and nationally important infrastructure is necessary to support the functioning of community and recognise their effects must be appropriately managed. Nova do not oppose reference to the Waitaki Power Scheme and proposed rewording, however, considers it is important that the proposed plan recognises and enables ‘appropriate’ existing and future development so that there is provision for new energy facilities and infrastructure where appropriate.</p> <p>Nova suggest the provision as follows:</p>	Part of submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
				<i>Existing and appropriate future renewable electricity generation activities...</i>	
		Support	Amend Strategic Objective UFD-O1 with an additional sixth clause.	Nova supports the protection of significant infrastructure and activities from reverse sensitivity effects.	Whole submission is allowed.
8	Enviro Waste Services Ltd	Support in part	Amend Strategic Objective ATC-O3 to include the additional sentence.	Nova supports the protection of significant infrastructure and activities from reverse sensitivity effects. Nova considers ATC-O3 ought to be otherwise amended to recognise and enable ‘appropriate’ existing and future development so that there is provision for new energy facilities and infrastructure where appropriate.	Part of submission is allowed.
9	Opuha Water Ltd	Support	Amend in Part One Chapter: Environmental Standards.	Amended wording provides clarity.	Whole submission is allowed.
		Support	Amend Chapter: ATC - A Thriving Community, introduction.	Amended wording provides clarity.	Whole submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
		Support in part	Retain Strategic Objectives ATC-O1 to ATC-O5 inclusive, as notified.	Nova support the retention of Objectives ATC-O1, ATC-O2 and ATC-O5 but considers it important that ATC-O3 and ATC-O4 are amended to recognise and enable ‘appropriate’ future development so that there is provision for new energy facilities and infrastructure where appropriate.	Part of submission is allowed.
		Oppose	Amend Chapter: MW - Mana Whenua introduction to read as aspirations not values.	Nova opposes the introduction readings as aspirations unless the change in wording is supported by Mana Whenua. Nova acknowledges the importance of recognising the values of Mana Whenua and therefore should be retained as notified.	Whole submission is disallowed.
10	Pukaki Tourism Holdings Ltd Partnership and Pukaki Village Holdings Ltd	Support	Amend Strategic Objective NE-O1.	Nova supports the amended wording as it provides clarity to the application of the objective.	Whole submission is allowed.
Support		Amend Strategic Objective ATC-O2.	Nova supports the recognition of the broad range of activities that can occur within rural areas.	Whole submission is allowed.	

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
11	Meridian Energy Ltd	Support	Amend the paragraph four of the introduction to Chapter: ATC - A Thriving Community and add a fifth paragraph.	Nova supports the relief sought as it provides recognises and enables existing and future development, particularly so that there is provision for new energy facilities and infrastructure.	Whole submission is allowed.
		Oppose in part	Replace Strategic Objective ATC-O4 to provide reference to the Waitaki Power Scheme.	<p>Nova considers that all locally, regionally and nationally important infrastructure is necessary to support the functioning of community and recognise their effects must be appropriately managed. Nova do not oppose reference to the Waitaki Power Scheme and proposed rewording, however, considers it is important that the proposed plan recognises and enables ‘<i>appropriate</i>’ existing and future development so that there is provision for new energy facilities and infrastructure where appropriate.</p> <p>Nova suggest the provision as follows:</p>	Part of submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
				<i>Existing and appropriate future renewable electricity generation...</i>	
		Support	Amend Strategic Objective UFD-O1 with an additional sixth clause.	Nova supports the protection of significant infrastructure and activities from reverse sensitivity effects.	Whole submission is allowed.
13	Road Metals Company Ltd	Support	Amend Chapter: UFD - Urban Form and Development to contain wording that reflects that the Mackenzie Basin sub-zone constitutes a broad scale ONL.	Nova supports refinement of the Mackenzie Basin sub-zone ONL so that areas around urban areas are not precluded or unduly constrained in providing for urban growth.	Whole submission is allowed.
14	Environment Canterbury	Support	Chapter: Cross Boundary Matters should focus on collaboration (as opposed to consultation) and should provide greater detail as to the process of collaboration and the tools that could be used, having regard to the matters outlined in Section 3.1 of the CRPS.	Nova support consistency with the Canterbury Regional Policy Statement (CRPS).	Whole submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
		Oppose in part	Retain Strategic Objective ATC-O1 clauses (1) and (3) as notified. Amend ATC-O1 clause (2), or alternatively add a new Strategic Objective.	<p>Nova opposes the deletion of the wording 'including appropriate economic development opportunities' in the proposed relief sought in ATC-O1 clause (2). Nova considers it is important that the proposed plan recognises and enables appropriate future development opportunities.</p> <p>Nova considers locally, regionally and nationally important infrastructure is necessary to support the functioning of community and recognise their effects must be appropriately managed, therefore Nova prefer that the alternative of adding a new strategic objective that seeks to avoid significant adverse effects is more appropriate.</p>	Part of submission is allowed.
		Oppose	Replace Strategic Objective ATC-O2.	Nova opposes the amended wording which limits the contribution of rural areas to natural and physical resources.	Whole submission is disallowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
		Oppose	Replace Strategic Objective Act-O3.	Nova considers infrastructure can be important locally, regionally and nationally. Nova considers it is important that the proposed plan recognises and enables ‘ <i>appropriate</i> ’ existing and future development so that there is provision for new energy facilities and infrastructure where appropriate. This is necessary to support the functioning of community and recognise their effects must be appropriately managed. It is submitted that ‘ <i>existing and future appropriate infrastructure</i> ’ should be referred to.	Whole submission is disallowed.
		Oppose	Delete Strategic Objective ATC-O4 or replace.	Nova considers it is important that the proposed plan recognises and enables ‘ <i>appropriate</i> ’ existing and future development so that there is provision for new energy facilities and infrastructure where appropriate. It is submitted that ‘ <i>Existing and appropriate future renewable electricity generation activities</i> ’ should be referred to.	Whole submission is disallowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
				<p>Nova opposes the deletion of ATC-O4 would not give effect to the NPS for Renewable Energy Generation and NPS on Electricity Transmission. Renewable electricity generation activities are to be recognised and provided for. The alternative also does not recognise the local, regional and national importance of renewable electricity generation activities.</p>	
		Support	Delete and replace Strategic Objective ATC-O5 and add an additional Strategic Objective ATC-O6	<p>Nova supports the additional Strategic Objective ATC-O6 in order to give effect to the CRPS direction relating to natural hazards. The amended wording of ATC-O5 is supported in so far as it provides clarity to on the application of the plan to the effects of climate change, whilst ensuring energy efficient infrastructure.</p>	Whole submission is allowed.
		Support in part	Amend Strategic Objective NE-O1.	<p>Nova supports the amendments sought to NE-O1 in so far as it recognises the values of the natural environment in so far as it does not disallow</p>	Part of submission is allowed.

No.	Nova support/oppose the submission of:	The particular part of the submission Nova support/oppose are:		The reasons for Nova support / opposition are:	Nova seek that the whole (or part) of the submission be allowed / disallowed:
				infrastructure development to be balanced in consideration with its integration into existing environments.	
		Support	Amend Strategic Objective UFD-O1.	Nova supports the amendments to UFD-O1 in so far as it clarifies the integration with the environment of appropriate development.	Whole submission is allowed.
16	Department of Conservation	Support	Amend introduction to Chapter NE -Natural Environment, paragraph 3, to fix a typo.	Nova supports the amended wording as it provides clarity to the application of the provision.	Whole submission is allowed.