

Report: Summary of Submissions by Submitter Number/Name

Submitter Number:	924	Submitter:	Alice Barnett
Organisation:	Genesis Energy Limited		
Point Number	924.1		
Summary of Decision Requested:	Amend the Proposed District Plan so that Regionally Significant Industries are identified explicitly in the Plan.		
Decision Reasons:	<ul style="list-style-type: none"> The submitter considers that existing and proposed regionally significant industry and regionally significant infrastructure is an important component of the Waikato District. Policy 4.4 in the Waikato Regional Policy Statement (WRPS) requires that the values and long-term benefits of regionally significant industry to economic, social and cultural wellbeing are recognised and that the potential for reverse sensitivity effects are avoided or minimised. Implementation method 4.4.1 anticipates that these matters will be addressed in District Plans. The RPS also requires that regionally significant industry be "identified in Regional or District plans." 		
Point Number	924.2		
Summary of Decision Requested:	Amend the Proposed District Plan to explicitly identify Huntly Power Station as a Regionally Significant Industry in appropriate places in the Plan.		
Decision Reasons:	<ul style="list-style-type: none"> The submitter considers that existing and proposed regionally significant industry and regionally significant infrastructure is an important component of the Waikato District. Policy 4.4 in the Waikato Regional Policy Statement (WRPS) requires that the values and long-term benefits of regionally significant industry to economic, social and cultural wellbeing are recognised and that the potential for reverse sensitivity effects are avoided or minimised. Implementation method 4.4.1 anticipates that these matters will be addressed in District Plans. The RPS also requires that regionally significant industry be "identified in Regional or District plans." 		
Point Number	924.3		
Summary of Decision Requested:	Add clause (c) to Section 1.4.4- Urban Environment as follows: <i>(c) In line with the Regional Policy Statement, the district plan must ensure that urban development recognises, provides for and protects existing and proposed regionally significant industry and regionally significant infrastructure.</i>		
Decision Reasons:	<ul style="list-style-type: none"> The submitter notes that the Proposed District Plan states that protecting the rural environment for such things as productive rural activities is a key focus for the plan and that a key issue for the urban environment is the maintenance of the productive capacity of rural resource. Whilst the submitter does not disagree with these, it considers that this must be achieved within a context that also protects existing and new regionally significant infrastructure and regionally significant industry. This is recognised in 1.4.3.2 (c) but not with respect to the urban environment in section 1.4.4. 		
Point Number	924.4		
Summary of Decision Requested:	Amend Section 1.5.5 (d)-Services and general infrastructure as follows or words to like effect: <i>The district needs to ensure the protection of regionally and nationally-significant infrastructure, i.e. e.g. electricity generation infrastructure and energy corridor, road and rail transport corridors, gas and transmission corridors and water infrastructure</i>		
Decision Reasons:	<ul style="list-style-type: none"> The use of "i.e." in the paragraph leads the reader to a specific interpretation limited to the infrastructure listed. The submitter submits that it would be more appropriate to use "e.g." to ensure that the listed infrastructure are identified as examples (and not an exhaustive list) of the regionally and nationally significant infrastructure. 		
Point Number	924.5		
Summary of Decision Requested:	Amend Section 1.5.5.7- Energy as follows: <i>The District Plan recognizes the national and regional importance of existing energy resources and infrastructure, which include coalfields, coal mines, Huntly Power Station, gas, electricity transmission, and coal conveyance facilities, as well as renewable energy. <u>These are regionally significant industries located in the Waikato District. The plan addresses the positive and adverse effects on energy infrastructure and development.</u></i>		
Decision Reasons:	<ul style="list-style-type: none"> The submitter supports the recognition of the importance of the Huntly Power Station and associated infrastructure both at a national and regional level. 		

- The submitter considers that the energy resources and infrastructure listed in section 1.5.5.7 should be identified as regionally significant industries.

Point Number 924.6

Summary of Decision Requested: **Delete** the areas identified on the planning maps as Significant Natural Areas on the Huntly Power Station site.

Decision Reasons:

- The submitter supports the Waikato District Council's general approach towards management and identification of the District's Significant Natural Areas (SNA) and acknowledges WDC's response to the feedback provided by the submitter on the Draft Proposed Plan.
- However, the submitter remains concerned with the extent of SNAs identified on the Huntly Power Station site, ancillary land and enhancement sites. Such enhancement sites having been planted and maintained by the submitter as requirements of regional resource consents.
- The Proposed Plan defines an SNA as "an area of significant indigenous biodiversity that is identified on the planning maps." From this definition there doesn't appear to be anything 'natural' about areas defined as SNAs and the term is therefore a misnomer when applied to created areas such as the Genesis River site planting projects.
- The areas currently by managed by the submitter for enhancement planting are subject to ongoing maintenance to enhance the values within the sites for the purpose of improving biodiversity but should not be protected in the same way as an existing natural area.
- The additional restrictions and rules as drafted in the Plan would impact the management of the enhancement plantings and the submitter's ability to meet conditions imposed by resource consents.

Point Number 924.7

Summary of Decision Requested: **Delete** the areas identified on the planning maps as Significant Natural Areas on 'Scott Farm,' Te Ohaki Road, Huntly as identified on the submission map.

Decision Reasons:

- The submitter supports the Waikato District Council's general approach towards management and identification of the District's Significant Natural Areas (SNA) and acknowledges WDC's response to the feedback provided by the submitter on the Draft Proposed Plan.
- However, the submitter remains concerned with the extent of SNAs identified on the Huntly Power Station site, ancillary land and enhancement sites. Such enhancement sites having been planted and maintained by the submitter as requirements of regional resource consents.
- The Proposed Plan defines an SNA as "an area of significant indigenous biodiversity that is identified on the planning maps." From this definition there doesn't appear to be anything 'natural' about areas defined as SNAs and the term is therefore a misnomer when applied to created areas such as the Genesis River site planting projects.
- The areas currently by managed by the submitter for enhancement planting are subject to ongoing maintenance to enhance the values within the sites for the purpose of improving biodiversity but should not be protected in the same way as an existing natural area.
- Drafted additional restrictions and rules as drafted in the Plan would impact the management of the enhancement plantings and Genesis' ability to meet conditions imposed by resource consents.

Point Number 924.8

Summary of Decision Requested: **Amend** Policy 3.2.3 (a) (iv)- Management Hierarchy as follows:

iv.) After remediation or mitigation has been undertaken, offset or compensate any significant residual adverse effects ~~in accordance with Policy 3.2.4.~~

Decision Reasons:

- The submitter supports the general approach to management of Significant Natural Areas (SNA) as detailed in Policy 3.2.3 and 3.2.4.
- The submitter considers that there may be circumstances where it is impractical for "no net loss" to be achieved. In that regard, the submitter considers that environmental compensation be included as a mechanism to manage effects, specifically for regionally significant industry and regionally significant infrastructure. This approach has been used widely around New Zealand in District Plans for managing biodiversity.

Point Number 924.9

Summary of Decision Requested: **Amend** Policy 3.2.4- Biodiversity Offsetting as follows:

(a) Allow for a biodiversity offset or compensatory measure to be offered by a resource consent applicant where an activity will result in significant residual adverse effects on a Significant Natural Area, or on indigenous biodiversity outside such Significant Natural Areas.

(b) Within a Significant Natural Area, a biodiversity offset or compensatory measure will only be considered appropriate where adverse effects have been avoided, remedied or mitigated in accordance with the hierarchy established in Policy 3.2.3; and

(i) The biodiversity offset is consistent with the framework detailed in Appendix 6 Biodiversity Offsetting; and

(ii) The biodiversity offset can achieve no net loss of indigenous biodiversity:

A. Preferably in the affected area of Significant Natural Area;

Or

B. Where that is not practicable, in the ecological district in which the affected area of Significant Natural Area is located.

(iii) Environmental compensation will be considered for effects associated with operation, maintenance and enhancement of regionally significant industry and regionally significant infrastructure.

Decision Reasons:

- The submitter supports the general approach to management of Significant Natural Areas (SNA) as detailed in Policy 3.2.3 and 3.2.4.
- The submitter considers that there may be circumstances where it is impractical for “no net loss” to be achieved. In that regard, the submitter considers that environmental compensation be included as a mechanism to manage effects, specifically for regionally significant industry and regionally significant infrastructure. This approach has been used widely around New Zealand in District Plans for managing biodiversity.

Point Number

924.10

Summary of Decision Requested:

Add clause (v) to Policy 3.2.6-Providing for Vegetation Clearance by including the following (or wording to similar effect):

(v) The vegetation is impinging on adjacent existing activities.

Decision Reasons:

- The submitter considers that there should be a provision of vegetation clearance within SNAs that includes clearance of vegetation that is impinging on adjacent existing activities.
- It is inappropriate to identify SNAs on land used for the Huntly Power Station and at Scott Farm.

Point Number

924.11

Summary of Decision Requested:

Delete the Significant Amenity Landscape overlay from the Huntly Power Station on the Planning Maps.

Decision Reasons:

- The submitter supports the general approach to maintain and enhance identified Significant Amenity Landscapes (SAL) as detailed in Section 3.4-Significant Amenity Landscapes.
- The area of the site's intake forebay and cooling water discharge has been identified as a SAL. It is not appropriate for this area be mapped as a SAL as public access is restricted due to significant health and safety risk.
- This area is zoned Heavy Industrial in the Proposed District Plan and there are no amenity landscapes in this area that need to be mapped or protected.

Point Number

924.12

Summary of Decision Requested:

Amend Planning Maps by removing the Significant Amenity Landscape (SAL) overlay from 'Scott Farm,' Te Ohaki Road, Huntly as identified on the submission map.

Decision Reasons:

- The submitter supports the general approach to maintain and enhance identified Significant Amenity Landscapes (SAL) as detailed in Section 3.4-Significant Amenity Landscapes.
- An area of the 'Scott Farm' land which the submitter owns has been identified as a SAL. This area is a productive dairy farm, in a rural landscape, and it forms part of the overall Huntly Power Station ash management regime, rather than an area with high amenity value that warrants protection.
- The submitter is concerned that the overlay may compromise the existing use of that land as a pastoral farm, the operation of the Huntly Power Station ash disposal system and the site enhancement and/or remediation work that the submitter is undertaking or proposes.
- Identification of this land as part of a SAL is inconsistent with operational uses of the land and health and safety matters arising from those operations.

Point Number

924.13

Summary of Decision Requested:

Retain Policy 4.1.6 Commercial and industrial activities, except for the amendments sought below

AND

Amend Policy 4.1.6 (a)- Commercial and Industrial activities as follows:

(a) Provide for commercial and industrial development in the following zones:

(i) Business Town Centre;

(ii) Business;

(iii) Industrial; ~~and~~

(iv) Heavy Industrial; and

(v) Electricity generation within the Huntly Power Station Heavy Industrial Zone.

Decision Reasons:

- The submitter supports the direction of Policy 4.1.6 that commercial and industrial activities be provided for in the Heavy Industrial Zone, which is what the Huntly Power Station has been zoned as.
- However, the submitter also considers that electricity generation activities should also be provided within the Huntly Power Station Heavy Industrial Zone.

Point Number 924.14

Summary of Decision Requested: **Add** clause (vi) to Policy 5.3.7 (a)- Reverse Sensitivity Effects as follows:
(vi) Existing and proposed regionally significant industry and regionally significant infrastructure.

Decision Reasons:

- The submitter considers that existing and proposed regionally significant industry and regionally significant infrastructure also forms part of the rural environment and should also be provided for in this policy.

Point Number 924.15

Summary of Decision Requested: **Amend** Policy 5.3.17 (b)- Specific Area- Huntly Power Station- Coal and ash water as follows:
(b) Provide for specific facilities that include the handling, stockpiling and haulage of coal and the ~~disposal~~ management of coal ash and associated water within identified areas in close proximity to Huntly Power Station.

Decision Reasons:

- The submitter supports Policy 5.3.17 as it recognises and provides for facilities that are integral to the operation of the Huntly Power Station.
- It is appropriate that the overlay in the planning maps specifies the area in which these activities occur and facilities are located.
- Policy 5.3.17 (b) Incorrectly lists the facilities as being for disposal of coal ash but those facilities provide for the management of the coal ash. The submitter considers this policy should be amended to correctly reflect the purpose for which the ash management site exists.
- Policy 5.3.17 does not list coal stockpiling in this specific area but this is an activity that is undertaken within the identified area and is integral to the operation of Huntly Power Station.

Point Number 924.16

Summary of Decision Requested: **Add** a new Policy to Section 6.1- General Infrastructure as follows:
6.1.X Policy- Regionally Significant Infrastructure
a. Have particular regard to the benefits that can be gained from the development and use of regionally significant infrastructure (as defined in the Waikato Regional Policy Statement 2016); and
b. Protect the effectiveness and efficiency of existing and planned regionally significant infrastructure.

Decision Reasons:

- The submitter considers that existing and proposed regionally significant infrastructure should be explicitly recognised and provided for in the Infrastructure section of the Plan.
- Policy 6.6 in the Waikato Regional Policy Statement requires that the effectiveness and efficiency of existing and planned regionally significant infrastructure is protected and that particular regard is given to the benefits that can be gained from the development and use of regionally significant infrastructure.

Point Number 924.17

Summary of Decision Requested: **Retain** Objective 6.1.1-Development, operation and maintenance of infrastructure in the same or similar form.

Decision Reasons:

- The submitter supports this objective and recommends it is retained in the same or similar form.

Point Number 924.18

Summary of Decision Requested: **Retain** Policy 6.1.2- Development, operation and maintenance in the same or similar form.

Decision Reasons:

- The submitter supports this policy and recommends it is retained in the same or similar form.

Point Number 924.19

Summary of Decision Requested: **Retain** Policy 6.1.4- Infrastructure benefits in the same or similar form.

Decision Reasons:

- The submitter supports this policy and recommends it is retained in the same or similar form.
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Point Number 924.20

Summary of Decision Requested: **Amend** Policy 6.1.5 (a)- Natural Hazards and Climate Change as follows:
(a) Encourage the design and location of new infrastructure to take account of natural hazards and the effects of climate change.

Decision Reasons:

- The submitter supports the intent of this policy, but recommends it is made explicit that this policy relates to new infrastructure.

Point Number 924.21

Summary of Decision Requested: **Retain** Objective 6.1.6- Reverse Sensitivity in the same or similar form.

Decision Reasons:

- The submitter supports this objective and recommends it is retained in the same or similar form.

Point Number 924.22

Summary of Decision Requested: **Retain** Policy 6.1.7- Reverse sensitivity and Infrastructure in the same or similar form.

Decision Reasons:

- The submitter supports this policy and recommends it is retained in the same or similar form.

Point Number 924.23

Summary of Decision Requested: **Amend** Objective 6.3.6 (a)- Non-renewable energy as follows
(a) Non-renewable energy resources and electricity generation are recognized within the district.

Decision Reasons:

- The submitter supports this objective and the recognition of non-renewable energy resources within the district.
- The submitter recommends that this policy is amended to make it explicit that the district also recognises non-renewable electricity generation.

Point Number 924.24

Summary of Decision Requested: **Retain** Policy 6.3.7- Recognise non-renewable energy resources in the same or similar form.

Decision Reasons:

- The submitter supports this policy and recommends it is retained in the same or similar form.

Point Number 924.25

Summary of Decision Requested: **Retain** rules in Section 14.2- Rules applying to all Infrastructure in the same or similar form.

Decision Reasons:

- The submitter is generally supportive of the proposed rule framework in section 14.2 of the Proposed District Plan.

Point Number 924.26

Summary of Decision Requested: **Retain** rules in Section 14.3- General Infrastructure in the same or similar form.

Decision Reasons:

- The submitter is generally supportive of the proposed rule framework in section 14.3 of the Proposed District Plan.

Point Number 924.27

Summary of Decision Requested: **Retain** Rule 14.6.1-Permitted Activities except for the amendments outlined below
AND
Add a new permitted activity to Rule 14.6.1- Permitted Activities as follows:
Activity
P5 Electricity generation within the Huntly Power Station Heavy Industrial Zone.
Activity-Specific Conditions
14.6.1.[X]

Electricity generation within the Huntly Power Station Heavy Industrial Zone that complies with the Huntly Power Station Heavy Industrial rules.

AND

Add a new activity to Rule 14.6.2- Restricted Discretionary Activities as follows:

Activity

RD4 Electricity generation within the Huntly Power Station Heavy Industrial Zone that do not comply with one or more conditions of the Rule 14.6.1. [X].

Activity-Specific Conditions

Discretion is restricted to the extent of effects associated with the Huntly Power Station Heavy Industrial Zone rules that the activity does not comply with.

Decision Reasons:

- Electricity generation is the primary activity undertaken within the Huntly Power Station Heavy Industrial Zone.
- The submitter considers it to be unclear whether "electricity generation" is an industrial activity provided for within the zone or whether the electricity generation provisions in section 14.6 apply.

Point Number 924.28

Summary of Decision Requested: **Retain** Activity specific condition 14.12.1.4 P4 (1)(f)- relating to- Traffic Generation as notified.

Decision Reasons:

- The submitter supports retaining the specific permitted activity conditions for traffic generation from Huntly Power Station.

Point Number 924.29

Summary of Decision Requested: **Retain** Rule 21.2.3.2 P1- Noise-Permitted Activities- Huntly Power Station as notified.

Decision Reasons:

- The submitter supports the permitted activity for noise generated by emergency generators and emergency sirens.

Point Number 924.30

Summary of Decision Requested: **Amend** Rule 21.2.3.2 P2- Noise-Permitted Activities- Huntly Power Station as follows

(a) Noise measured at the notional boundary of any dwelling house existing as at 25 September 2004 ~~within any site~~ in the Rural Zone does not exceed:

(i) 55 dB (LAeq), 7am to 10pm

(ii) 45 dB (LAeq) and 75 dB (LMax), 10pm to 7am the following day.

Decision Reasons:

- The submitter is supportive of including specific noise rules for Huntly Power Station.
- The wording of Permitted Activity Rule 2 and Rule 3 differs from the Operative District Plan in that it refers to noise measured within any site in the Residential Zone or at the notional boundary within any site in the Rural Zone. This means that if sites change within either zone, the noise standard that the Huntly Power Station is expected to meet will change, particularly within the Rural Zone.
- Development outside of the Huntly Power Station site could compromise operation of the Station as it is difficult to alter the current operating noise environment around the Station.
- The submitter therefore recommends that the present rule framework providing for the existing noise emissions remains in place and protects the significant infrastructure from potential noise and reverse sensitivity effects.
- The submitter does not consider the Section 32 Report provides adequate justification as to why these changes to the permitted activity rules have been made.

Point Number 924.31

Summary of Decision Requested: **Amend** Rule 21.2.3.2 P3- Noise-Permitted Activities- Huntly Power Station as follows:

(a) Noise measured ~~within any site in the Residential Zone must meet the permitted noise levels for that zone,~~ at the site boundary of any dwelling house existing as at 25 September 2004 in any other zone does not exceed:

(i) 50dBA (L10), 7am to 7pm, Monday to Saturday, and

(ii) 45dBA (L10), 7pm to 10pm, Monday to Saturday; and

(iii) 40dBA (L10), and 65dBA (Lmax) all other times and public holidays.

Decision Reasons:

- The submitter is supportive of including specific noise rules for Huntly Power Station.
- The wording of Permitted Activity Rule 2 and Rule 3 differs from the Operative District Plan in that it refers to noise measured within any site in the Residential Zone or at the notional boundary within any site in the Rural Zone. This means that if sites change

within either zone, the noise standard that the Huntly Power Station is expected to meet will change, particularly within the Rural Zone.

- Development outside of the Huntly Power Station site could compromise operation of the Station as it is difficult to alter the current operating noise environment around the Station.
- The submitter therefore recommends that the present rule framework providing for the existing noise emissions remains in place and protects the significant infrastructure from potential noise and reverse sensitivity effects.
- The submitter does not consider the Section 32 Report provides adequate justification as to why these changes to the permitted activity rules have been made.

Point Number 924.32

Summary of Decision Requested: **Amend** Rule 21.2.6- Hazardous Substances as follows:

Hazardous substance use, storage or disposal at any site within a Heavy Industrial zone shall be managed in accordance with the Safety at Work (Hazardous Substances) Regulations, and that any activity that does not comply with the Safety at Work (Hazardous Substances) Regulation is a discretionary activity.

OR

Amend Rule 21.2.6 PI- Hazardous substances as follows:

(a) *The use, storage or disposal of any hazardous substance where:*

(i) *The aggregate quantity of hazardous substance of any hazard classification on a site is less than the quantity specified for the Heavy Industrial Zone in Table 5.1 contained within Appendix 5 (Hazardous Substances); or*

(ii) *The activity is located in the Heavy Industrial Zone at Huntly Power Station and is located at least 20m distance from the zone boundary, except in relation to existing water intake and outfall structures (where no setback applies).*

Decision Reasons:

- A range of hazardous substances are stored and used at Huntly Power Station, in compliance with the relevant Health and Safety at Work (Hazardous Substances) Regulations and the Health and Safety at Work Act (HSAW Act).
- The submitter notes that the proposed hazardous substance rules represent a duplication of the requirements under these regulations and HSAW Act and would prefer that all control of such substances at Huntly Power Station site is exercised under the Regulations and HSAW Act, designed specifically for and is fit for that purpose.
- Alternatively, the submitter seeks site specific provisions relating to the Huntly Power Station site to provide for such matters as operation of the gas reception area and operation of the water intake structures on the banks of the Waikato River.

Point Number 924.33

Summary of Decision Requested: **Retain** Rule 21.2.7.1 P1, P2, P3 and RD1-Signs -General in the same or similar form.

Decision Reasons:

- The submitter supports the rule framework proposed.

Point Number 924.34

Summary of Decision Requested: **Add** a new clause (a) to Rule 21.2.8 PI- Outdoor storage of goods or materials as follows:

(a) Stockpiles of coal located within existing stockpile areas on the Huntly Power Station site; or

AND

Amend Rule 21.2.8 PI (a) Outdoor storage of goods or materials as follows:

(b) ~~(a)~~ Outdoor storage of goods or materials must comply complying with all of the following conditions....

Decision Reasons:

- Coal stockpiles are maintained at the Huntly Power Station in order to provide an ongoing supply of coal to the generation units, created specifically for the power station's operation and can vary in dimension within the stockpile over time as generation demand varies. With such changes due to coal supplies arriving in bulk, or coal being stockpiled to provide generation resilience during potential power supply shortages
- The stockpiles are managed as a strategic fuel supply source. The submitter seeks the flexibility to operate the coal stockpiles within the site according to demand requirements rather than the specific limits in the Proposed Plan and therefore there should be no bulk limits in relation to these areas.

Point Number 924.35

Summary of Decision Requested: **Add** a new permitted activity to Rule 21.3.1 PI Height-General as follows:

P2

(a) The construction or alteration of any building or structure at the Huntly Power Station may be up to:

(i) A maximum height of 60m, and

(ii) 35m on 90% of the site.

Decision Reasons:

- The Operative District Plan contains specific rules for the construction or alteration of a building or structure at Huntly Power Station.
- The submitter requests that the Proposed Plan retains the specific provisions for Huntly Power Station from the Operative District Plan to ensure future development is not compromised.

Point Number 924.36

Summary of Decision Requested: Amend Rule 22.2.4 PI Hazardous Substances as follows:

(a) The use, storage or disposal of any hazardous substance where:

(i) The aggregate quantity of hazardous substances of any hazard classification on a site is less than the quantity specified for the Rural Zone in Table 45.1 contained within Appendix 45 (Hazardous Substances), or

(ii) he activity is located in Specific Area 22.6.1 and is managed in accordance with the Health and Safety at work (Hazardous Substances) Regulations.

Decision Reasons:

- A range of hazardous substances are stored and used at Huntly Power Station, in compliance with the relevant Health and Safety at Work (Hazardous Substances) Regulations and the Health and Safety at Work Act (HSAW Act).
- The submitter notes that the proposed hazardous substance rules represent a duplication of the requirements under these regulations and HSAW Act and would prefer that all control of such substances at Huntly Power Station site is exercised under the Regulations and HSAW Act, designed specifically for and is fit for that purpose.

Point Number 924.37

Summary of Decision Requested: Add a new setback requirement to Rule 22.3.7.2 PI Building Setback- Sensitive Land Use as follows:

(x) 500m from the boundary of the Huntly Power Station.

Decision Reasons:

- Land surrounding Huntly Power Station is zoned Rural.
- Huntly Power Station is not listed in PI and The submitter considers it appropriate for the power station to also be listed.

Point Number 924.38

Summary of Decision Requested: Amend Section 22.6 Specific Area-Huntly Power Station-Coal and Ash Water to create a stand alone set of rules for the Huntly Power Station as set out in the submission.

Decision Reasons:

- The submitter supports the intent of the Waikato District Council in addressing concerns raised in the previous feedback provided by the submitter in relation to coal and ash management.
- However, the rules proposed in the Rural Zone chapter are unnecessarily complex and involve a significant degree of cross referencing.
- The submitter considers that given the specificity of the ash management practices to the Huntly Power Station (in that few other activities in the district would require rules of this nature) a standalone rule, specific to the Huntly Power Station activities should be created that does not rely on cross referencing.
- The ash ponds are not the final location for disposal of the ash. It is an ash management facility where by the suspended solids (i.e. ash) are separated from the ash water.
- The ash water is returned to the Huntly Power Station and discharged via the cooling water outfall. The solid ash is reclaimed from the ponds, stockpiled (for drying) and then transported to an appropriate offsite disposal facility. The submitter considers that all of these activities should be covered by way of a specific permitted activity rule. Therefore, the specific area should be renamed "Huntly Power Station: Coal and Ash Management Specific Area."

Point Number 924.39

Summary of Decision Requested: Retain Appendix I 6.1 Conditions for Permitted Activities in the same or similar form.

AND

Retain Appendix I Table 14: Internal Sound Level in the same or similar form.

Decision Reasons:

- The submitter supports the specific requirements for buildings containing noise-sensitive activities within 350m of the Huntly Power Station site boundary requiring specific internal sound levels.

Point Number 924.40

Summary of Decision Requested: No specific decision sought, but submission is neutral in terms of Rule 21.2.5.2-Earthworks- Significant Natural Areas as this rule has implications for the requested deletion of the Significant Natural Areas on the Huntly Power Station and Scott Farm.

Decision Reasons:

- Part of the Huntly Power Station that is zoned Heavy Industrial has been identified as a SNA. This identification is inappropriate for such a site.

Point Number 924.41

Summary of Decision Requested: **Retain** the objectives, policies, rules, planning maps/overlays and section 32 to enable the continued operation of the Huntly Power Station and associated ancillary activities, except where otherwise sought in the submission points.

Decision Reasons:

- Given the national importance of the Huntly Power Station, the submitter has significant interest in ensuring that the current and future operation of Huntly Power Station is not compromised.

Point Number 924.42

Summary of Decision Requested: **Amend** the Section 32 Report for Infrastructure regarding the Huntly Power Station's transition to being completely gas fired as set out in the submission

Decision Reasons:

- The information about the Rankine Units is not correct.

Point Number 924.43

Summary of Decision Requested: **Add** clause (iv) to Policy 4.1.13 (a)- Huntly as follows:

(iv) Reverse sensitivity effects on regionally significant industry and infrastructure are avoided or minimised.

Decision Reasons:

- It is important to protect existing and new regionally significant infrastructure and/or industry from reverse sensitivity issues as a direction of the Regional Policy Statement, which the District Plan must give effect to.
- The submitter considers it important to explicitly state in the Plan that Huntly is developed in such a manner that recognizes, provides for and protects the Huntly Power Station and ancillary activities.

Point Number 924.44

Summary of Decision Requested: **Retain** Policy 4.6.2- Provide Industrial Zones with different functions except for the amendments sought below
AND

Add a new clause (iii) to Policy 4.6.2-Provide Industrial Zones with different functions as follows:

(iii) Recognise and provide for the Huntly Power Station as a regionally significant industry.

Decision Reasons:

- The submitter supports the inclusion of Industrial and Heavy Industrial Zones in the Waikato District Plan and their appropriate application to activities such as regionally significant industries.
- The submitter considers that Huntly Power Station should be recognized as a regionally significant industry in this policy context.

Point Number 924.45

Summary of Decision Requested: **Add** clause (viii) to Policy 4.7.2- Subdivision location and design by including the following as follows:

(viii) Avoids reverse sensitivity effects on existing and proposed regionally significant industry and regionally significant infrastructure.

Decision Reasons:

- The submitter considers that subdivision activities in the urban environment must be located and designed to ensure reverse sensitivity effects on regionally significant industry and infrastructure are avoided.

Point Number 924.46

Summary of Decision Requested: **Amend** Policy 4.7.11 - Reverse Sensitivity as follows:

(b) Avoid potential reverse sensitivity effects of locating new dwellings sensitive activities in the vicinity of an intensive farming, extraction industry or industrial activity.

AND

Add clause (c) to Policy 4.7.11 - Reverse Sensitivity as follows:

(c) Avoid potential reverse sensitivity effects of locating new sensitive activities in the vicinity of Regionally Significant Industry or Regionally Significant Infrastructure.

Decision Reasons:

- The submitter supports Policy 4.7.11 Reverse Sensitivity but considers it be amended to explicitly refer to existing and proposed regionally significant industry and regionally significant infrastructure in the same way it refers to intensive farming, extraction industry and industrial activity and to replace "dwellings" with "sensitive activities."

Point Number

924.47

Summary of Decision Requested:

Add clause (c) to Policy 5.3.3- Industrial and Commercial Activities as follows:

(c) Provide for the existing coal and ash transport and management facilities associated with the Huntly Power Station.

Decision Reasons:

- The submitter considers that the matters listed should be extended to include the coal transport and ash management activities associated with the Huntly Power Station.