



11 October 2018

The Chief Executive

Waikato District Council

ECM Project: DPRPh5-03
ECM #
Submission #
Customer # <u>162511</u>
Property #

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Dear Mr Ion

Submission by Genesis Energy Ltd on Proposed Waikato District Plan

Genesis Energy Ltd lodged a submission on the Proposed Waikato District Plan on Tuesday 9 October 2018 via email to districtplan@waidc.govt.nz.

Upon reviewing our submission the following day, an administrative error has come to our attention. While our submission on Section 14.6 Electricity Generation on page 13 requests new permitted and restricted discretionary rules to provide for electricity generation in the Huntly Power Station Heavy Industrial Zone, when formatting the submission table ahead of lodging the submission, that part of the relief sought with respect to this submission point which proposed wording for the new restricted discretionary activity rule was inadvertently removed from the final text. The relief sought which was removed was part of a table which showed the proposed new Restricted Discretionary Rule and should have appeared at the bottom of page 13. We have corrected the submission table to show the relief sought with the inclusion of the proposed restricted discretionary activity rule and have appended the correct version of our submission to this letter.

We would appreciate your confirmation that our original submission has been replaced with our corrected submission wording as soon as possible.

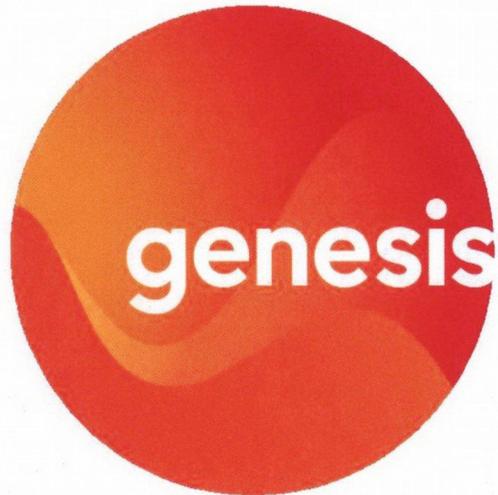
If you have any queries please do not hesitate to contact me on 09 958 5061 or alice.barnett@genesisenergy.co.nz

Yours sincerely,

Alice Barnett

Environmental Lead – Policy and Planning

Encl. Genesis Energy submission on the Proposed Waikato District Plan.



Submission by Genesis Energy Limited

Trading as Genesis

ON

Proposed Waikato District Plan

9 October 2018

Submission by Genesis Energy Limited

Trading as Genesis

ON

Proposed Waikato District Plan

To: The Chief Executive
Waikato District Council
Private Bag 544
Ngaruawahia 3742

districtplan@waidc.govt.nz

Date: 9 October 2018

Submitter Name: Genesis Energy Limited

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Environmental Lead – Policy & Planning

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Address for Service: As above

1. Introduction

Genesis Energy Limited (**Genesis**) welcomes the opportunity to provide a submission to the Waikato District Council (**WDC**) on the Proposed Waikato District Plan 2018 (Stage 1) (the **Proposed District Plan**), which was publicly notified on 18 July 2018.

Genesis wishes to be heard in support of this submission.

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

2. Background

Genesis is an electricity generator and energy retailer with a diverse portfolio of renewable and thermal electricity generation assets including hydro, thermal and wind generation plants spread across New Zealand. It is one of the largest electricity generators in the country.

Within the Waikato District Council area, Genesis owns and operates the Huntly Power Station located beside the Waikato River at Huntly. The Huntly Power Station currently has the country's largest fleet of thermal electricity generators.

Huntly Power Station

Huntly Power Station comprises the following six separate generating units:

- Units 1 to 4, the four original nominal 250 MW Rankine generating units capable of burning coal, natural gas or a combination of the two and, when necessary, fuel oil to support unit start up during restricted gas supply or combustion difficulties;
- Unit 5, one nominal 403 MW combined cycle gas turbine; and
- Unit 6, one nominal 50 MW open cycle gas turbine, which is also capable of firing diesel.

Collectively, Huntly Power Station represents approximately 12.5% of **New Zealand's installed** generation capacity. Huntly Power Station is, and will remain for the foreseeable future, a significant **component of New Zealand's electricity supply system**, particularly due to its size, proximity to the Auckland load centre, unique ability to stockpile fuel on site and ability to provide security of energy supply during dry years, peak periods or when other weather dependant generation is unable to meet consumer demand. **Genesis' current plans are to keep the Rankine Units operational until at least 2022.** As part of the need to manage thermal generation to meet the future needs of New Zealand,

changes have been made to the existing Waikato Regional Council resource consents to provide for the operation of additional fast-start open cycle gas turbines.

The operational footprint of the Huntly Power Station consists of a number of land parcels. The primary power station infrastructure is located on the corner of Hetherington and Te Ohaaki Roads. The 'West Mine' coal receival site is located to the west of the power station and coal is delivered to the power station site via a 3 kilometre overland conveyor. Excess ash is slurried through a dedicated pipeline from the power station to the 'Ash Ponds' which are located 2 kilometre north of the main site.

Genesis also holds several ancillary land parcels in the area, including agricultural land adjacent to the Ash Ponds (referred to as 'Scott Farm') and land immediately north and south of the main power station site. The operational and non-operational sites are shown in Figure 1 below.

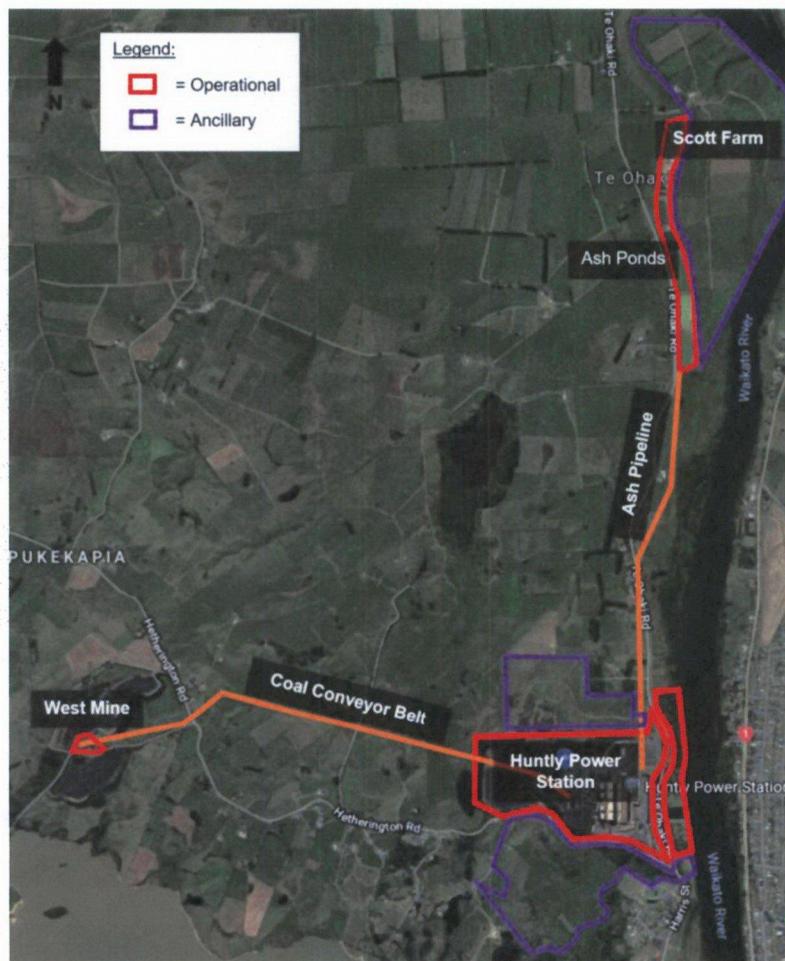


Figure 1. Location of Huntly Power Station site and ancillary sites (outlined in orange) (Scale 1:36,000).

Given the national importance of the Huntly Power Station, Genesis has significant interest in the Proposed Waikato District Plan to ensure that the current and future operation of the Huntly Power Station is not compromised.

3. Submissions and Relief Sought

Genesis seeks the retention of the objectives, policies, rules, planning maps/ overlays, and Section 32 Analysis to enable the continued operation of the Huntly Power Station and associated ancillary activities, except where otherwise requested by this submission.

As a general submission point, Genesis considers that the Huntly Power Station is Regionally Significant Infrastructure as set out in the Waikato Regional Policy Statement (and could also be considered as a Regionally Significant Industry). The Waikato District Plan is required to provide for these regionally significant activities.

This section details Genesis' specific submissions and the relief sought.

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
Whole of Plan		Genesis 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 (RPS) requires that the value and long-term benefits of regionally significant industry to economic, social and cultural wellbeing is 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".	That Regionally Significant Industries be identified explicitly in the Waikato District Plan and that, the Huntly Power Station be explicitly identified as a Regionally Significant Industry in appropriate places in the District Plan.
SECTION A PLAN OVERVIEW AND STRATEGIC DIRECTIONS			
Chapter 1: Introduction			
1.4.4 The urban environment	Support with amendments	Genesis 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 the rural resource. While Genesis 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 part in 1.4.3.2(c), but not with respect to the urban environment in 1.4.4.	That the following be added to 1.4.4: <u>"(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."</u>
1.5.5 (d) Services and general infrastructure	Support with amendments	This paragraph comments on the need to ensure protection of regionally and nationally-significant infrastructure and lists a number of current infrastructure types. The use of "i.e." in this paragraph leads the reader to a specific interpretation limited to	Amend part of 1.5.5(d) to read as follows, or words to like effect: <u>"... The district needs to ensure the protection of regionally and nationally-significant infrastructure, i.e. e.g. electricity</u>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		the infrastructure listed. Genesis 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.	generation infrastructure and energy corridor, road and rail transport corridors, gas and transmission corridors and water infrastructure. ...”
1.5.7.7 Energy	Support with amendments	Genesis supports the recognition of the importance of the Huntly Power Station and associated infrastructure both at a national and regional level. Genesis considers that the energy resources and infrastructure listed in 1.5.7.7 should be identified as regionally significant industries.	Amend 1.5.7.7 as follows: “The district plan recognises 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 of energy infrastructure and development.</u> ”
SECTION B OBJECTIVES AND POLICIES			
Chapter 3: Natural Environment			
3.2 Significant Natural Areas	Support with amendments	Genesis supports WDC’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 Genesis on the Draft Proposed Plan. However, Genesis 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 Genesis as requirements of regional resource consents. The Proposed Plan defines SNA as “... an area of significant indigenous biodiversity that is identified ... on the planning maps.” It does not appear from this definition that there has to be anything “natural” about areas defined as SNAs. That is, the term SNA is a misnomer when applied to created areas like the Genesis river site planting projects.	That the areas identified on the planning maps as Significant Natural Areas on the Huntly Power Station Site and ‘Scott Farm’ be removed.

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		<p>The areas that are currently being managed by Genesis 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.</p> <p>The additional restrictions and rules as drafted in the Proposed District Plan would impact on the management of the enhancement plantings and Genesis' ability to meet conditions imposed by resource consents.</p>	
3.2.3 Policy - Management hierarchy	Support with amendments	<p>Genesis supports the general approach to management of Significant Natural Areas (SNA) as detailed in Policy 3.2.3 and 3.2.4.</p> <p>Genesis considers that there may be circumstances where it is impractical for "not net loss" to be achieved. In that regard, Genesis 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.</p>	<p>Amend Policy 3.2.3(a) as follows: "(a) Recognise and protect indigenous biodiversity within Significant Natural Areas by: ... (iv) after remediation or mitigation has been undertaken, offset <u>or compensate</u> any significant residual adverse effects in accordance with Policy 3.2.4."</p>
3.2.4 Policy – Biodiversity Offsetting	Support with amendments		<p>Amend Policy 3.2.4 as follows: "(a) Allow for a biodiversity offset <u>or compensatory measure</u> 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 <u>or compensatory measure</u> 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:</p>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
			<p>A. preferably in the affected area of Significant Natural Area; or</p> <p>B. where that is not practicable, in the ecological district in which the affected area of Significant Natural Area is located.</p> <p><u>(iii) Environmental compensation will be considered for effects associated with operation, maintenance and enhancement of regionally significant industry and regionally significant infrastructure.</u></p>
3.2.6 Policy - Providing for vegetation clearance	Support with amendments	<p>As stated above, Genesis consider it inappropriate to identify Significant Natural Areas (SNA) on land used for the Huntly Power Station and at Scott Farm. Nevertheless, Genesis consider that there should be a provision of vegetation clearance within SNA that includes clearance of vegetation that is impinging on adjacent existing activities.</p>	<p>That the following, or similar, be added to 3.2.6: <u>“(v) the vegetation is impinging on adjacent existing activities.”</u></p>
3.4 Significant Amenity Landscapes	Support in part	<p>Genesis supports the general approach to maintain and enhance identified Significant Amenity Landscapes (SAL) as detailed in section 3.4.</p> <p>With respect to the Huntly Power Station site, the area of the 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.</p> <p>An area of the ‘Scott Farm’ land which Genesis 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. Genesis is concerned that the overlay may compromise the existing use of that land as a pastoral farm, the</p>	<p>Genesis requests that the SAL overlay in the planning maps be removed from the Huntly Power Station Heavy Industrial Zone and Scott Farm.</p>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		<p>operation of the Huntly Power Station ash disposal system and the site enhancement and/or remediation work that Genesis 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.</p> <p>Genesis requests that the SAL overlay be removed from the Huntly Power Station Site and Scott Farm.</p>	
Chapter 4: Urban Environment			
4.1.6 Policy – Commercial and industrial activities	Support with amendments	Genesis supports the direction of Policy 4.1.6 that commercial and industrial activities be provided in the Heavy Industrial Zone, which is what the Huntly Power Station has been zoned as. However, Genesis also considers that electricity generation activities should also be provided within the Huntly Power Station Heavy Industrial Zone.	Retain Policy 4.1.6 in the same or similar form with the following amendments: “... (ii)Business; (iii)Industrial; and (iv)Heavy Industrial; and <u>(v) Electricity generation within the Huntly Power Station Heavy Industrial Zone.”</u>
4.1.13 Policy – Huntly	Support with amendments	As noted above, 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. Genesis considers it important to be explicit in the Proposed District Plan that Huntly is developed in such a manner that recognises, provides for and protects the Huntly Power Station and ancillary activities.	That the following be added to Policy 4.1.13 (a): <u>“(iv) Reverse sensitivity effects on regionally significant industry and infrastructure are avoided or minimised.”</u>
4.6.2 Policy – Provide Industrial Zones with	Support with amendments	Genesis 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. Genesis considers that Huntly	Retain Policy 4.6.2 in the same or similar form, with the addition of a new clause (iii):

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
different functions		Power Station should be recognised as a regionally significant industry in this policy context.	<u>“(iii) Recognise and provide for the Huntly Power Station as a regionally significant industry.”</u>
4.7.2 Policy – Subdivision location and design	Support with amendments	Genesis considers that subdivision activities in the urban environment must be located and designed to ensure that reverse sensitivity effects on regionally significant industry and infrastructure are avoided.	That the following be added to Policy 4.7.2 Policy: <u>“(viii) Avoids reverse sensitivity effects on existing and proposed regionally significant industry and regionally significant infrastructure.”</u>
4.7.11 Policy – Reverse sensitivity	Support with amendments	Genesis supports Policy 4.7.11 Reverse Sensitivity but considers that it should be amended to explicitly refer to existing and proposed regionally significant industry and regionally significant infrastructure in the same way that it refers to intensive farming, extraction industry and industrial activity and to replace “dwellings” with “sensitive activities”.	That Policy 4.7.11 be amended by 1. Replacing “dwellings” in Policy 4.7.11(b) with “sensitive activities”; and 2. Including (c) as follows: <u>“(c) Avoid potential reverse sensitivity effects of locating new sensitive activities in the vicinity of Regionally Significant Industry or Regionally Significant Infrastructure.”</u>
Chapter 5: Rural Environment			
5.3.3 Policy – Industrial and commercial activities	Support with amendments	Policy 5.3.3 provides for industrial and commercial activities in the rural environment. Genesis considers that the matters listed should be extended to include the coal transport and ash management activities associated with the Huntly Power Station.	That the following be added to Policy 5.3.3: <u>“(c) Provide for the existing coal and ash transport and management facilities associated with the Huntly Power Station.”</u>
5.3.7 Policy - Reverse sensitivity effects	Support with amendments	Policy 5.3.7 recognises reverse sensitivity matters relating to agricultural activities in the rural environment. Genesis 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.	Add a new (vi) to Policy 5.3.7(a) as follows: <u>“(vi) Existing and proposed regionally significant industry and regionally significant infrastructure.”</u>
5.3.17 Policy – Specific area - Huntly Power Station – Coal and ash water	Support with amendments	Genesis 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.	That Policy 5.3.17 is amended as follows: <u>“(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.”</u>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		<p>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. Genesis considers that this policy should be amended to correctly reflect the purpose for which the ash management site exists.</p> <p>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.</p>	
Chapter 6: Infrastructure and Energy			
6.1 General Infrastructure			
6.1 General Infrastructure	New Provision	Genesis 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.	<p>That a new Policy 6.1.X be inserted into the District Plan as follows:</p> <p><u>“6.1.X Policy – Regionally Significant Infrastructure</u> <u>(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</u> <u>(b) Protect the effectiveness and efficiency of existing and planned regionally significant infrastructure.”</u></p>
6.1.1 Objective – Development, operation and maintenance of infrastructure	Support	Genesis supports this objective and recommend it is retained in the same or similar form.	Retain Objective 6.1.1 in the same or similar form.
6.1.2 Policy - Development, operation and maintenance	Support	Genesis supports this policy and recommend it is retained in the same or similar form.	Retain Policy 6.1.2 in the same or similar form.

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
6.1.4 Policy – Infrastructure benefits	Support	Genesis supports this policy and recommend it is retained in the same or similar form.	Retain Policy 6.1.2 in the same or similar form.
6.1.5 Policy – Natural hazards and climate change	Support with amendments	Genesis supports the intent of this policy, but recommend it is made explicit that this policy relates to new infrastructure.	Amend Policy 6.1.5(a) as follows: “(a) Encourage the design and location of <u>new</u> infrastructure to take account of natural hazards and the effects of climate change.”
6.1.6 Objective – Reverse sensitivity	Support	Genesis supports this objective and recommend it is retained in the same or similar form.	Retain Objective 6.1.6 in the same or similar form.
6.1.7 Policy – Reverse sensitivity and infrastructure	Support	Genesis supports this policy and recommend it is retained in the same or similar form.	Retain Policy 6.1.7 in the same or similar form.
6.3 Energy			
6.3.6 Objective – Non-renewable energy	Support with amendments	Genesis supports this objective and the recognition of non-renewable energy resources within the district. Genesis recommends that this policy is amended to make it explicit that the district also recognises non-renewable electricity generation.	Amend Objective 6.3.6 as follows: “(a) Non-renewable energy resources <u>and electricity generation</u> are recognised within the district.”
6.3.7 Policy – Recognise non-renewable energy resources	Support	Genesis supports this policy and recommend it is retained in the same or similar form.	Retain Policy 6.3.7 in the same or similar form.
SECTION C RULES			
Chapter 14: Infrastructure and Energy			

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)								
14.2 Rules applying to all infrastructure	Support	Genesis is generally supportive of the proposed rule framework in section 14.2 of the Proposed District Plan.	Retain rules in 14.2 in the same or similar form.								
14.3 General infrastructure	Support	Genesis is generally supportive of the proposed rule framework in section 14.3 of the Proposed District Plan.	Retain rules in 14.3 in the same or similar form.								
14.6 Electricity generation	Support with amendment	Electricity generation is the primary activity undertaken within the Huntly Power Station Heavy Industrial Zone. Genesis considers that it is unclear whether "electricity generation" is an industrial activity provided for within the zone or whether the electricity generation provisions in section 14.6 apply. Genesis requests new permitted and restricted discretionary activity rules to provide for electricity generation within the Huntly Power Station Heavy Industrial Zone.	<p>Support with the addition of a new Permitted Activity Rule 14.6.1 as follows:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Activity-specific conditions</th> </tr> </thead> <tbody> <tr> <td>P5 Electricity generation within the Huntly Power Station Heavy Industrial Zone</td> <td>14.6.1.[X] Electricity generation within the Huntly Power Station Heavy Industrial Zone that complies with the Huntly Power Station Heavy Industrial Zone rules.</td> </tr> </tbody> </table> <p>And, a new Restricted Discretionary Activity Rule as follows:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Activity-specific conditions</th> </tr> </thead> <tbody> <tr> <td>RD4 Electricity generation within the Huntly Power Station Heavy Industrial Zone that do not comply with one or more of the conditions Rule 14.6.1.[X]</td> <td>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.</td> </tr> </tbody> </table>	Activity	Activity-specific conditions	P5 Electricity generation within the Huntly Power Station Heavy Industrial Zone	14.6.1.[X] Electricity generation within the Huntly Power Station Heavy Industrial Zone that complies with the Huntly Power Station Heavy Industrial Zone rules.	Activity	Activity-specific conditions	RD4 Electricity generation within the Huntly Power Station Heavy Industrial Zone that do not comply with one or more of the conditions Rule 14.6.1.[X]	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.
Activity	Activity-specific conditions										
P5 Electricity generation within the Huntly Power Station Heavy Industrial Zone	14.6.1.[X] Electricity generation within the Huntly Power Station Heavy Industrial Zone that complies with the Huntly Power Station Heavy Industrial Zone rules.										
Activity	Activity-specific conditions										
RD4 Electricity generation within the Huntly Power Station Heavy Industrial Zone that do not comply with one or more of the conditions Rule 14.6.1.[X]	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.										
14.12 Transportation											

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
P4 Traffic Generation	Support	Genesis supports retaining the specific permitted activity conditions for traffic generation from Huntly Power Station.	Retain 14.12.1.4(1)(f) in the same form.
Chapter 21: Industrial Zone Heavy			
21.2.3.2 Noise – Huntly Power Station			
21.2.3.2 P1	Support	Genesis support the permitted activity for noise generated by emergency generators and emergency sirens.	Retain permitted activity rule 21.2.3.2 P1 in the same form.
21.2.3.2 P2	Support with amendments	Genesis is supportive of including specific noise rules for Huntly Power Station. However, 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.	Amend permitted activity rule 21.2.3.2 P2 as follows: “(a) Noise measured at the notional boundary <u>of any dwelling house existing as at 25 September 2004</u> within any site in the Rural Zone does not exceed: (i) 55dB (LAeq), 7am to 10pm (ii) 45dB (LAeq) and 75dB (LAm _{ax}), 10pm to 7am the following day.”
21.2.3.2 P3	Support with amendments	Genesis 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. Genesis does not consider the Section 32 Report provides adequate justification as to why these changes to the permitted activity rules have been made. Noting the Section 32 Report states “ <i>However, these standards in the Waikato Section have been place for a considerable period of time.</i> ” and we	Amend permitted activity rule 21.2.3 P3 as follows: “(a) Noise measured within any site in the Residential Zone must meet the permitted noise levels for that zone. at the site <u>boundary of any dwelling house existing as at 25 September 2004 in any other zone does not exceed:</u> (i) <u>50dBA (L10), 7am to 7pm, Monday to Saturday, and</u> (ii) <u>45dBA (L10), 7pm to 10pm, Monday to Saturday; and</u> (iii) <u>40dBA (L10), and 65dBA (Lmax) all other times and public holidays.</u> ”

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		assume this statement references the standards in the Operative District Plan.	
21.2.5 Earthworks			
21.2.5.2 Earthworks - Significant Natural Areas	Neutral	As above, part of the Huntly Power Station that is zoned Heavy Industrial has been identified as a Significant Natural Area (SNA). Genesis has advised this identification is inappropriate for such a site and requested that the SNA be removed from the Huntly Power Station site.	That the areas identified on the planning maps as Significant Natural Areas on the Huntly Power Station Site and 'Scott Farm' be removed.
21.2.6 Hazardous substances			
21.2.6 P1	Support with amendments	<p>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 (the Regulations) and the Health and Safety at Work Act (the HSAW Act). Genesis 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 the Huntly Power Station site is exercised under the Regulations and HSAW Act, which is designed specifically for and is fit for that purpose.</p> <p>Alternatively, Genesis 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.</p>	<p>That either:</p> <p>A. Rule 21.2.6 be amended to read "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) Regulations is a discretionary activity"; OR</p> <p>B. That P1 is amended to read:</p> <p>"(a) The use, storage or disposal of any hazardous substance where:</p> <p>(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); <u>or</u></p> <p>(ii) <u>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).</u>"</p>
21.2.7.1 Signs	Support	Genesis supports the rule framework proposed.	Retain 21.2.7.1 P1, P2, P3 and RD1 in the same or similar form.

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
21.2.8 P1 Outdoor storage of goods or materials	Support with amendments	Coal stockpiles are maintained at the Huntly Power Station in order to provide an ongoing supply of coal to the power station generation units. These stockpiles were created specifically for the purpose of the power station operation and can vary in dimension within the stockpile over time as generation demand varies. These changes can be due to coal supplies arriving in bulk, coal being stockpiled in order to provide generation resilience during potential power supply shortages (such as during low river inflows or significant maintenance outages at other places in the New Zealand generation and transmission network. The stockpiles are managed as a strategic fuel supply source. Genesis 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 (note that location would be managed through the requirement that they stay within the existing stockpile areas.	That 21.2.8 Outdoor storage of goods or materials be amended by adding the following wording to P1 Outdoor storage of goods: <u>“(a) Stockpiles of coal located within existing stockpile areas on the Huntly Power Station site; or</u> <u>(b) (a) Outdoor storage of goods or materials must comply complying with all of the following conditions...”</u>
21.3 Land Use - Building			
21.3.1 P1 Height - General	Oppose	The Operative District Plan contains specific rules for the construction or alteration of a building or structure at the Huntly Power Station. Genesis 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.	That a new permitted activity rule be inserted as follows: <u>“P2</u> <u>(a) The construction or alteration of any building or structure at the Huntly Power Station may be up to:</u> <u>(i) a maximum height of 60 m, and</u> <u>(ii) 35m on 90% of the site.”</u>
Chapter 22: Rural Zone			
22.2.4 Hazardous substances		A range of hazardous substances are stored and used at Huntly Power Station and ancillary sites, in compliance with the relevant Health and Safety at Work (Hazardous Substances) Regulations (the	That 22.2.4 P1 is amended to read: “(a) The use, storage or disposal of any hazardous substance where:

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		<p>Regulations) and the Health and Safety at Work Act (the HSAW Act). Genesis 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 the Huntly Power Station and ancillary sites is exercised under the Regulations and HSAW Act, which is designed specifically for and is fit for that purpose.</p> <p>Alternatively, Genesis seeks site specific provisions relating to the Huntly Power Station operations.</p>	<p>(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 65.1 contained within Appendix 65 (Hazardous Substances), <u>or</u></p> <p><u>(ii) the activity is located in Specific Area 22.6.1. and is managed in accordance with the Health and Safety at work (Hazardous Substances) Regulations.</u></p>
22.3.7.2 Building setback – sensitive land use	Support with amendments	<p>The land surrounding the Huntly Power Station is zoned Rural. The permitted activity rule P1 lists specific distances for the set back of buildings for a sensitive land use from particular activities or sites. The Huntly Power Station is not listed in P1 and Genesis consider it appropriate for the power station to also be listed.</p>	<p>Add a new (x) to Rule 23.3.7.2 P1 as follows: <u>“(x) 500 m from the boundary of the Huntly Power Station.”</u></p>
22.6 Specific Area Huntly Power Station Coal and Ash Water	Support with amendments	<p>Genesis supports the intent of the Waikato District Council in addressing concerns raised in the previous feedback provided by Genesis 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.</p> <p>Genesis 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 any rules of this nature) a standalone rule, specific to the Huntly Power Station activities should be created that does not rely on cross referencing.</p> <p>The ash ponds are not the final location for disposal of the ash. It is an ash management facility where by the suspend solids (i.e. ash) are separated from the ash water. The ash water is returned to the Huntly Power</p>	<p>The rule be amended as follows:</p> <p><u>22.6 – Amend the heading to “Specific Area – Huntly Power Station – Coal and Ash Management.</u></p> <p>22.6.1 Application of Rules</p> <p>(a) <u>Notwithstanding any other rule in the District Plan</u>, the rules that apply to a permitted activity are set out in Rule 22.6.2 within the Huntly Power Station: Coal and Ash Water Management Specific Area as identified on the planning maps are as follows:</p> <p>(i) Rule 22.2 Land Use – Effects</p> <p>(ii) Rule 22.3 Land Use – Building, except:</p> <p style="padding-left: 40px;">A. Rule 22.3.7 Building setbacks do not apply and Rule 22.6.3 applies instead; and</p>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
		<p>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. Genesis considers that all of these activities should be covered by way of a specific permitted activity rule.</p> <p>In that regard the specific area should be renamed "Huntly Power Station: Coal and Ash Management Specific Area".</p>	<p>B.Rule 22.3.4 Height does not apply and Rule 22.6.4 applies instead.</p> <p>C.Rule 22.6.5;</p> <p>D.Rule 22.6.6; and</p> <p>E.Rule 22.6.7</p> <p>(b)The rules that apply to any other activity that is not provided in Rule 22.6.2 are those that apply to the Rural Zone as follows:</p> <p>(i)Rule 22.1 Land Use – Activities</p> <p>(ii)Rule 22.2 Land Use – Effects</p> <p>(iii)Rule 22.3 Land Use – Building; and</p> <p>(iv)Rule 22.4 Subdivision</p> <p>22.6.2 Permitted Activities – Huntly Power Station <u>Coal</u></p> <p>(a)The rules that apply to a specific permitted activity within the Huntly Power Station: Coal and Ash Water Specific Area as identified on the planning maps are as follows:</p> <p>(i)Rule 22.2 Land Use – Effects</p> <p>(ii)Rule 22.3 Land Use – Building, except:</p> <p>A.Rule 22.3.7 Building setbacks do not apply and Rule 22.6.3 applies instead; and</p> <p>B.Rule 22.3.4 Height does not apply and Rule 22.6.4 applies instead.</p> <p>C.Rule 22.6.6 Coal stockpile height, setback and coverage;</p> <p>D.Rule 22.6.7 Ash disposal and transport of coal ash water; and</p>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)						
			<p data-bbox="1485 316 2036 373">E.Rule 22.6.8 Energy corridor – transportation of minerals and substances</p> <table border="1" data-bbox="1340 423 2036 719"> <tr> <td data-bbox="1340 423 1446 719">P1</td> <td data-bbox="1446 423 2036 719"> <p data-bbox="1458 435 1848 462">(a) Coal related activities involving:</p> <ul style="list-style-type: none"> <li data-bbox="1530 472 1680 500">(i) stockpiling; <li data-bbox="1530 509 1809 537">(ii) screening and sorting; <li data-bbox="1530 547 1930 574">(iii) use of transportation conveyors; <li data-bbox="1530 584 2020 641">(iv) erection, operation, and maintenance of loading and unloading facilities; and <li data-bbox="1530 651 2020 708">(v) an activity that is ancillary to those listed in (i) – (iv) above. </td> </tr> </table> <p data-bbox="1333 781 2036 808">22.6.3 Discretionary Activities – Huntly Power Station Coal</p> <p data-bbox="1333 818 1961 846">(a) The activities listed below are discretionary activities.</p> <table border="1" data-bbox="1340 857 2036 938"> <tr> <td data-bbox="1340 857 1446 938">D1</td> <td data-bbox="1446 857 2036 938">An activity that does not comply with Rule 22.6.2 P1.</td> </tr> </table> <p data-bbox="1333 1036 2036 1092">22.6.4 Building setback and location – Huntly Power Station</p> <table border="1" data-bbox="1340 1105 2036 1312"> <tr> <td data-bbox="1340 1105 1446 1312">P1</td> <td data-bbox="1446 1105 2036 1312"> <p data-bbox="1458 1117 1703 1144">(a) A building must be:</p> <ul style="list-style-type: none"> <li data-bbox="1530 1154 2020 1268">(i) set back at least 20m from every boundary of Specific Area 22.6 where its height exceeds 20m; and </td> </tr> </table>	P1	<p data-bbox="1458 435 1848 462">(a) Coal related activities involving:</p> <ul style="list-style-type: none"> <li data-bbox="1530 472 1680 500">(i) stockpiling; <li data-bbox="1530 509 1809 537">(ii) screening and sorting; <li data-bbox="1530 547 1930 574">(iii) use of transportation conveyors; <li data-bbox="1530 584 2020 641">(iv) erection, operation, and maintenance of loading and unloading facilities; and <li data-bbox="1530 651 2020 708">(v) an activity that is ancillary to those listed in (i) – (iv) above. 	D1	An activity that does not comply with Rule 22.6.2 P1.	P1	<p data-bbox="1458 1117 1703 1144">(a) A building must be:</p> <ul style="list-style-type: none"> <li data-bbox="1530 1154 2020 1268">(i) set back at least 20m from every boundary of Specific Area 22.6 where its height exceeds 20m; and
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Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)	
				<p>(ii) set back at least 10m from every boundary of Specific Area 22.6 where its height is up to 20m; or</p> <p>(iii) located within an energy corridor.</p>
			D1	A building that does not comply with Rule 22.6.4 P1.
			<p>22.6.5 Building height</p>	
			P1	<p>(a) A building must not exceed a height of:</p> <p>(i) 30m within an area of up to 1500m²; and</p> <p>(ii) 20m for the balance of Specific Area 22.6.</p>
			D1	A building that does not comply with Rule 22.6.5 P1.
			<p>22.6.64 Coal stockpile height, setback and coverage</p>	
			P1	<p>(a) Coal stockpiles must:</p> <p>(i) not exceed a height of 15m;</p> <p>(ii) be set back at least 5m from the boundary of Specific Area 22.6;</p> <p>(iii) not exceed 25% of Specific Area 22.6.</p>

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)								
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SECTION D APPENDICES AND SCHEDULES											
Chapter 29: Appendices											
Appendix 1: Acoustic Insulation											

Provision	Support / Oppose	The submission is:	Relief Sought (additions <u>underlined</u> , deletions struck through)
6. Acoustic insulation for other areas	Support	Genesis supports the specific requirements for buildings containing noise-sensitive activities within 350 m of the Huntly Power Station site boundary requiring specific internal sound levels.	Retain 6.1 Conditions for Permitted Activities and the associated Table 14: Internal sound level in the same or similar form.

4. Section 32 Analysis

Genesis has some concerns regarding the messaging about the Huntly Power Stations transition to being completely gas fired contained in the Section 32 Report for Infrastructure.

"1.3 Resource Management Issues to be Addressed

5. Huntly Power Station generates 953 MW and is New Zealand's largest power station by capacity and is owned and operated by Genesis Energy. The power station currently has three units operating

- *Unit 5 – 403MW which uses natural gas as a fuel source*
- *Two Rankine units – Two 250MW units which are capable of using coal and gas to generate electricity.*
- *Unit 6 – 50.8MW which burns gas or diesel to generate electricity*

While Genesis Energy is intending to phase out the coal-fired Rankine units, the Huntly site will continue to generate electricity from the two existing gas fuelled units."

This statement is not correct. There are four Rankine Units on the Huntly Power Station site, all of which are consented to operate on coal as well as gas until 2037. Two of these units are currently operational, one is about to be put into 'dry' storage and another has been decommissioned.

In addition, the last sentence regarding the Rankine Units is also not correct. The Rankine Units can be fully run on gas and while coal as a fuel source is planned to be phased out on site, the Rankine Units can still operate on gas.

Genesis requests that the Section 32 Report be amended to reflect the correct status of the Huntly Power Station, as follows (and in any place necessary in the Section 32 reports):

"Huntly Power Station currently generates up to 953.8 MW and is New Zealand's largest power station by capacity and is owned and operated by Genesis Energy. The power station has the following units:

- *Unit 5 – 403MW which uses natural gas as a fuel source*
- *Four Rankine Units – 250MW units which are capable of using coal and gas to generate electricity.*
- *Unit 6 – 50.8MW which burns gas or diesel to generate electricity*

Genesis also has the ability under its regional council consents to construct and operate an additional 400MW of gas fired generation to progressively replace the Rankine Units.

While Genesis is intending to phase out the use of coal as a fuel source at some point in the future, all of the current units on site are able to run on natural gas. Huntly Power Station is, and will remain for the foreseeable future, a significant component of New Zealand's electricity supply system."

If you wish to discuss any of the matters raised in our submission, please do not hesitate to contact Alice Barnett (Environmental Lead – Policy and Planning) on 07 958 5061 or alice.barnett@genesisenergy.co.nz

Yours sincerely

A handwritten signature in black ink, appearing to read 'Karen Sky', written in a cursive style.

Karen Sky

Environmental Manager