

**BEFORE THE HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act  
1991 (**Act**)

**AND**

**IN THE MATTER** of hearing submissions on Plan  
Change 42 (**PC42**) to the Taupo  
District Plan (**TDP**)

**BY** **MERCURY NZ LIMITED**  
**Submitter #68**

**STATEMENT OF EVIDENCE OF HAYLEY STRONGE  
FOR MERCURY NZ LIMITED**

**PLANNING**

**9 August 2023**

## **1.0 INTRODUCTION**

- 1.1 My name is Hayley Andrea Stronge. I am a Senior Planner with Harrison Grierson Consultants Limited (**HGCL**) a multi-disciplinary consulting company with six offices throughout New Zealand. I have held this role for 4 years.
- 1.2 I have a Bachelor's Degree in Resource and Environmental Planning from Massey University in Palmerston North, completed in 1997. Since then, I have had approximately 15 years' planning and resource management experience. I have worked as a planner in both the public and private sector.
- 1.3 I am very familiar with the Taupo District as I grew up and went to school here. I have also lived and worked here as a Senior Planner for HGCL and have experience using the Taupo District Plan (**TDP**), Waikato Regional Plan (**WRP**) and the Waikato Regional Policy Statement (**WRPS**).

## **2.0 CODE OF CONDUCT**

- 2.1 Although this is not an Environment Court Hearing I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it.
- 2.2 I confirm that the topics and opinions addressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

## **3.0 BACKGROUND**

- 3.1 I have been engaged by Mercury NZ Limited (**Mercury**) to provide independent expert planning evidence on the issues raised in Mercury's submission and further submissions on PC42 to the TDP.
- 3.2 Mercury is a generator and retailer of electricity throughout New Zealand. 100% of Mercury's electricity is generated from renewable energy sources covering hydro, geothermal and wind generation. Mercury operates the Waikato Hydro Scheme consisting of the Taupo Control Gates, eight dams and nine power stations with a total electricity generating capacity of approximately 1050MW. The Taupo Control Gates, Aratiatia, Ohakuri, Atiamuri, Whakamaru, Maraetai II and Maraetai I (Left abutment/half of Dam power stations are all located within the Taupo District General Rural Environment (**GRE**). Mercury also operates five geothermal power stations within the Taupo volcanic zone,

four of which are located within the Taupo District, with a total net capacity of approximately 370MW.

- 3.3 There are also other renewable electricity generators in the Taupo District including, Contact, Genesis and Manawa. Together we have prepared a plan showing the location and capacity for each Renewable Electricity Generation (**REG**) site in the Taupo District. There are 21 in total (refer to **Attachment 1**). I note here that the plan excludes the Taupo Control Gates which is an essential structure capturing hydro energy.
- 3.4 Given the abundant number of REG sites in the Taupo District, I consider that the Taupo District is well positioned to play a significant role in New Zealand's successful transition to a low carbon economy.
- 3.5 In preparing my evidence I have:
- a) Reviewed the notified version of PC42;
  - b) Reviewed Mercury's submission and further submission on PC42;
  - c) Reviewed the Overarching s.42A report prepared by Ms Hilary Samuel on behalf of TDC covering Plan Changes 38 – 42;
  - c) Reviewed the s.42A report and appendices prepared by Mr Craig Sharman on behalf of TDC specifically relating to PC42;
  - d) Liaised with Mercury and other electricity generators that operate within the Taupo District;
- 3.6 As requested in Minute 5 of the Independent Hearing Panel a s42AA evaluation report is provided in **Attachment 2**. This assessment is at a level of detail that corresponds to the scale and significance of the changes.

#### **4.0 SCOPE OF EVIDENCE**

- 4.1 This evidence is structured to reflect the following key topics:

##### **Definitions**

- i) Renewable Electricity Generation
- ii) Renewable Electricity Generation Activities
- iii) Rural Industry
- iv) Reverse Sensitivity

## **Enabling Renewable Electricity Generation Activities**

- i) Enabling the use of Natural Resources
- ii) Rural Character
- iii) Development, operation, maintenance and upgrading of REG activities
- iv) Other Activities in the GRE
- v) Reverse Sensitivity
- vi) Investigation, Identification and Assessment of potential REG sites
- vii) Setbacks for REG from High Voltage Transmission lines

4.2 All recommended new text to PC42 is underlined and all recommended text to delete is struck-through.

4.3 Attached to my evidence as **Attachment 3** are suggested amendments to PC42. I have numbered each proposed amendment for ease of reference.

## **5.0 DEFINITIONS**

### **5.1 Renewable Electricity Generation**

5.1.1 REG is an activity that has been recognised in the National Policy Statement for Renewable Electricity Generation 2011 (**NPS-REG**) as a matter of national significance. It is also identified in the WRPS as Regionally Significant Infrastructure.

5.1.2 Mercury submission point 68.63 sought to include a definition of 'Renewable Electricity Generation' that is provided for in the NPS-REG as follows:

*Renewable Electricity Generation – means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.*

5.1.3 The s.42A report accepts this definition. I agree with this addition.

### **5.2 Renewable Electricity Generation Activities**

5.2.1 Mercury submission point 68.13 sought to include the definition of REG activities, as defined in the NPS-REG, as follows:

*Renewable Electricity Generation Activities - means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and*

*the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.*

- 5.2.2 The s.42A report rejects this submission point on the basis that “*The definition has a much broader meaning within the proposed rule framework. Using the phrase in the current framework would make provisions weaker, i.e permitted activities, when they should not.*” It also states that an Energy Chapter<sup>1</sup> will be produced through a future plan change that will capture REG activities.
- 5.2.3 I am of the view that the definition of ‘REG activities’ as recommended by Mercury and as defined in the NPS-REG, should be included in the TDP through PC42. These activities exist in the GRE of the Taupo District and need to be recognised and provided for (such as geothermal drilling). REG activities are referenced in the PC38 and PC42 provisions and this new definition provides clarity and reduces any ambiguity about what REG’s are.
- 5.2.4 I also consider that the inclusion of the definition of REG activities in the TDP, would recognise the national importance of REG activities as is required in the NPS-REG objective, as follows:

*NPS-REG - Objective*

*To recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand’s electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government’s national target for renewable electricity generation.*

- 5.2.5 I support the development of a separate Energy Chapter within the TDP, but the timing of this is uncertain, while the need to provide for the operation, upgrade and development of REG activities is not uncertain. It is here and now, and a definition is appropriate in my view. It is also important given the amended ‘Rural Industry’ definition (refer paragraph 5.3.3).

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<sup>1</sup> (the Overarching s.42A report, it states that in the future an Energy Chapter is “*anticipated to be developed as part of Bundle 2 or potentially additional bundles if necessary.*”).

### 5.3 Rural Industry

- 5.3.1 Mercury submission point 68.12 sought an amendment to the definition of 'Rural Industry', as follows:

*Rural Industry – an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, and dairy farming ~~and geothermal/electricity generation.~~*

- 5.3.2 Mercury sought to remove the inclusion of 'geothermal / electricity generation' from the definition of 'Rural Industry' as REG should have its own definition separate from Rural Industry. REG sites are located in the rural environment but are subject to specific national policy direction and should not be simply included as 'Rural Industry' in the rural environment.
- 5.3.3 The s.42A report recommends deleting the definition of 'Rural Industry' altogether and instead using the definition provided in the National Planning Standards 2019 (NPS). This is as follows:

*Rural Industry - means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.*

- 5.3.4 I support this amendment and note that it has the same practical effect as that recommended by Mercury. This recommendation shall however, be considered alongside the Mercury point regarding the definition of REG activities (as covered in 5.2).
- 5.3.5 In my view, as the NPS definition of 'Rural Industry' does not include REG and a new separate definition for REG and REG activities is recommended (as mentioned in the above paragraphs) this is supported.

### 5.4 Reverse Sensitivity

- 5.4.1 Mercury's submission 68.64 seeks to include a new definition for 'Reverse Sensitivity' as follows:

*Reverse sensitivity - is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.*

- 5.4.2 The s.42A report recommends accepting Mercury's submission point, but then includes in the track changes version, the following definition which is clearly derived from somewhere else.

Reverse Sensitivity – means the potential for the operation of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment of other activities which are sensitive to the adverse environmental effects being generated by the pre-existing activity.

- 5.4.3 I note that Mercury's version is the wording of the WRPS and I prefer it for consistency reasons.

## **6.0 RENEWABLE ELECTRICITY GENERATION ACTIVITIES**

### **6.1 Enable the use of Natural Resources**

- 6.1.1 Mercury's submission point 68.15 supports objective 3b.2.1 with an amendment so that it covers a wider range of activities not just primary production. It reads as follows:

Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources

*Primary production and the use of natural resources are is enabled by protecting the availability of ~~the~~ rural land and other resources and ~~is~~ their productive capability.*

- 6.1.2 The s.42A report accepts these amendments and I agree with this as the objective recognises that REG activities are part of the rural environment.

### **6.2 Rural Character**

- 6.2.1 In Mercury's submission point 68.16, it was outlined that objective 3b.2.2 does not seek the right outcome. The objective states that the established character of the GRE should be 'maintained', which infers that the existing established character is not changed.

- 6.2.2 Mercury recommended replacing objective 3b.2.2 with a new objective, which aims to enable activities (such as new subdivision or development) to occur which are compatible with the rural character, as follows:

~~Objective 3b.2.2 Maintaining the established General Rural character~~ General Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~ Enable a range of activities in the General Rural Environment that are compatible with rural character.

6.2.3 The s.42A report advises that the objective is in regard to protecting the rural environment from subdivision and retaining rural productivity.

6.2.4 Whilst I acknowledge the point made in the s.42A report, that the cumulative effects need to be controlled, I consider that the notified PC42 objective, reduces the ability for any form of development to occur, whether it be a dairy shed, raceways, or REG activities. The objective needs to be 'enabling' rather than trying to just 'maintain' the status quo. I recommend the following changes are made to objective 3b.2.2:

*Objective 3b.2.2 Maintaining the established General Rural character*

*~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~ Enable a range of activities in the General Rural Environment that are compatible with and cumulatively do not erode rural character*

6.2.5 Mercury also submitted on policy 3b.2.9 linked to objective 3b.2.2, in submission point 68.21. The related policy compiles a list of attributes that the GRE character is defined by, such as large open space, a mix of residential and rural industry buildings. Mercury recommended amending policy 3b.2.9 to include activities that exist in the rural environment as follows:

*Policy 3b.2.9 Maintaining the established Rural character*

*Enable activities in the ~~Maintain the established~~ General Rural Environment that will not compromise the character of the General Rural Environment, as defined by:*

*a) Extensive pastoral farming and forestry*

*b) Renewable Electricity Generation Activities*

*c) Geothermal areas and activities, electricity transmission and distribution*

*d) Large open spaces between built structures*

*e) A mix of residential and rural industry buildings*

*~~Noises related to production activities during the day but low levels of noise at night~~*

*~~Low levels of light spill~~*

*f) Effects from activities including noise, vibration, dust, odour and visual effects*

*~~Infrequent vehicle movements to and from a site~~*

*g) Limited signage that directly relates to the activity operating on the site.*



6.2.6 The s.42A report rejects these amendments advising that the additional wording is “...*too specific when policy was aimed at being more broad, setting out general features of the rural environment not specific activities*”.

6.2.7 In my opinion the policy already includes specific reference to production activities, ie; residential and rural industry buildings, and should include specific activities such as extensive pastoral farming and forestry and REG activities, including operation structures and activities (such as geothermal drilling and pipelines, well pads and drill sites). These form part of the existing rural environment.

### **6.3 Development, operation, maintenance and upgrading of REG activities**

6.3.1 Mercury’s submission point 68.17 recommends a new objective which is specific to REG and Transmission Activities. This is consistent with Mercury’s request to include definitions for REG activities and amended definitions for Rural Industry and REG’s (which are supported in the s.42A report). The new objective is:

*Objective 3b.2.X - Renewable Electricity Generation and Transmission Activities.*

*Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment*

6.3.2 The s.42A report considers that this objective is not required as REG related objectives and policies are already included in PC38 and these cover all zones.

6.3.3 It is my view, that a specific objective in the GRE needs to be included specifically featuring and expressing the importance of REG activities, helping New Zealand to achieve the reduction in net Green House Gas (GHG) emissions to 50% below gross 2005 levels by 2030 and to reach net zero carbon emissions by 2050<sup>2</sup>. Without the specific objective being provided in the GRE Chapter, and with no dedicated Energy Chapter in the TDP<sup>3</sup>, I consider that there is currently inadequate policy coverage in the TDP, particularly in relation to identifying that REG’s and REG activities being able to be located in the rural environment given that they are part of the existing rural character.

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<sup>2</sup> [Greenhouse gas emissions targets and reporting | Ministry for the Environment](#)

<sup>3</sup> (the Overarching s.42A report, it states that in the future an Energy Chapter is “*anticipated to be developed as part of Bundle 2 or potentially additional bundles if necessary.*”).

## 6.4 Other Activities in the GRE

- 6.4.1 As a consequential change to Mercury's submission point 68.18 above, Mercury sought to remove the reference to REG activities in objective 3b.2.4 as follows:

*Objective 3b.2.4 Other activities*

*Maori cultural activities, tourism activities, and visitor accommodation ~~and renewable electricity generation and transmission activities~~ are enabled in appropriate locations within the General Rural Environment.*

- 6.4.2 The s.42A report advises that the term 'appropriate locations' "*is not clear and has potential to have a contested meaning.*" and that the recommended objective "*...provides a clear list of current activities in rural locations*".
- 6.4.3 I consider that the term 'appropriate locations' is important in this objective as it recognises that activities such as visitor accommodation are considered to be 'sensitive' activities. These activities should be enabled in 'appropriate locations' away from existing activities such as REG's already existing in the GRE.
- 6.4.5 In addition, I consider that REG and transmission activities should be removed from this objective and that the new recommended objective above (as mentioned in section 6.3 above) should be included to enable REG and Transmission activities.
- 6.4.6 Mercury's submission point 68.25 refers to policy 3b.2.14 which aims to limit the scale of commercial and industrial activities in the GRE. It states:

*Policy 3b.2.14 Commercial and industrial activity*

*Limit the scale of commercial and industrial activity (excluding renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.*

- 6.4.7 The s.42A report rejects this amendment, recommending that there be an amendment to exclude 'Rural Industry' only, as follows:

*Policy 3b.2.14 Commercial and industrial activity*

*Limit the scale of commercial and industrial activity (excluding rural industry) to avoid the uptake of general rural land by activities that are provided for in other*

*Environments and may impact on the availability of land for primary production activities within the General Rural Environment.*

- 6.4.8 The s.42A report advises that this policy does not apply to REG activities as it is not covered in the 'Rural Industry' definition and that this chapter of the plan is not the appropriate place to include REG's.
- 6.4.9 In my opinion however this policy does in fact apply to REG's, even though REG activities are not in the new definition of 'Rural Industry' (in PC42). This is because REG's are defined as an 'industrial activity' in the TDP. See current definition in the TDP where REG activities are included (in bold) as follows:

*Industrial Activities – activities including associated land and buildings used for the manufacturing, fabricating, processing, packing or storage of goods, servicing and repair of goods whether by machinery or hand, research and training facilities, **electricity generation activities** and includes offices associated with the above.*

- 6.4.10 In my opinion it is appropriate to specifically exclude REG activities in this policy, as REG activities need to be provided for and anticipated in the GRE as well as primary production. I consider that the amendments recommended in the s.42A report and Mercury's amendments combined would be appropriate. An amended version to incorporate both, is as follows:

*Policy 3b.2.14 Commercial and industrial activity*

*Limit the scale of commercial and industrial activity (excluding rural industry and renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.*

## **6.5 Reverse Sensitivity**

- 6.5.1 Mercury's submission point 68.19 sought minor amendments to objective 3b.2.5, to avoid reverse sensitivity effects on permitted legally 'established and/or consented activities'. It states:

*Objective 3b.2.5 – Avoidance of reverse sensitivity*

*Reverse sensitivity effects on permitted, ~~and~~ legally established, and/or consented activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.*

- 6.5.2 The s.42A report accepts Mercury's submission as the additional text provides for consented activities that are not yet built.
- 6.5.3 I agree that these amendments should be accepted.
- 6.5.4 Mercury submission points 68.22, 68.23 and 68.34 are summarised together below as they relate to the reverse sensitivity effects on sensitive activities such as rural lifestyle development in the GRE, minor residential units in the GRE and minor residential units in the RLE.
- 6.5.5 Mercury's submission point 68.22 recommends expanding policy 3b.2.10, to ensure rural lifestyle development is limited in the GRE as it can result in reverse sensitivity effects or can constrain REG activities (such as the future use of renewable energy resources). It reads as follows:

*Policy 3b.2.10 - Residential units*

*Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:*

- a) Increase the demand for community infrastructure and services*
- b) Result in the inefficient use of land or loss of future flexibility for productive uses*
- c) Erode the general rural character through its density, scale and location.*
- d) Result in the potential to generate reverse sensitivity effects.*
- e) Constrain the ability to access or utilise renewable energy resources.*

- 6.5.6 Mercury's submission point 68.23 recommends amendments to policy 3b.2.12. The policy reads:

*Policy 3b.2.12 - Minor residential unit*

*Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.*

- 6.5.7 Mercury's submission point 68.34 recommends amending policy 3b.3.12 (the corresponding policy for the RLE) in the same manner. The policy reads:

*Policy 3b.3.12 Minor residential unit*

*Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, ~~and~~ to further protect the character of the ~~Rural Lifestyle Environment~~— and to avoid reverse sensitivity effects.*

- 6.5.8 The s.42A report accepts Mercury's suggested change to the lead sentence of paragraph 3b.2.10, but rejects Mercury's amendments to clauses d) and e). The s.42A report rejects amendments to policy 3b.2.12 and rejects amendments to policy 3b.3.12 also. This is on the basis that there is already reverse sensitivity policy in policy 3b.2.13 and 3b.3.2 that this would duplicate. Also that REG activities do not need to be covered across the entire plan.
- 6.5.9 In my view, without specific policy in the GLE and the RLE of the TDP regarding potential reverse sensitivity effects, there would be inadequate policy coverage in these Environments, particularly in relation to sensitive activities such as new residential units and/or minor residential units. It is important to have specific policy regarding reverse sensitivity in these Environments as there are many existing REG sites and REG associated access roads in the GRE or within close proximity to RLE.
- 6.5.10 It is also noted that whilst the s.42 report recommends rejecting these suggested recommendations, the "Appendix 2 – Officer Recommended Amendments to PC42" shows the track changes accepting Mercury's recommendation for policy 3b.3.12. In my opinion Mercury's suggested amendment needs to be included as there are no other specific reverse sensitivity policies in the RLE.

## **6.6 Investigation, Identification and Assessment of potential REG sites**

- 6.6.1 Mercury's submission point 68.38 sought to include amendments to enable the operation, maintenance and minor upgrading of REG activities in the GRE as identified as a matter of national importance and stated in the objective of the NPS-REG. The recommended amendments included:

*Rule 4b.1.4 Electricity Generation Core Sites, Renewable Electricity ~~Energy~~  
Generation Activities and Geothermal Areas ~~Steamfield~~*

- i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas ~~steamfield~~, renewable ~~energy~~ electricity generation activities and associated structures and ancillary activities is a permitted activity.*

- ii. Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.

*NOTE: For the purpose of this rule “maintenance” means: All activities associated with the protective care, and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor, test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas*

*NOTE: For the purpose of this rule “minor upgrading” means: Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures ~~of similar character and scale~~, and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. ~~up to 100m<sup>2</sup> in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m<sup>2</sup> in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.~~*

- 6.6.2 The s.42A report rejected these amendments (except for the replacement of ‘energy’ for ‘electricity’). The amendments were rejected on the basis that the terms are too wide and broad.
- 6.6.3 In my opinion, with the absence of an Energy Chapter in the TDP, there is a reliance on the provisions of the GRE Chapter and the Strategic Directions Chapter for REG activities to be provided for. There is currently no provision for the investigation, identification and assessment of potential sites and energy sources for REG in these chapters (except in relation to the height of REG activities within Electricity Generation Core Sites) and in order to achieve the Government’s set targets for net zero carbon emissions, the ability to explore new REG sites is vital.

## 6.7 Setbacks for REG from High Voltage Transmission lines.

6.7.1 Mercury's submission point 68.40, recommends amending rule 4b.1.7 as follows:

*4b.1.7 Buildings and Structures in proximity to High voltage transmission lines*

- i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line is a restricted discretionary activity.*

6.7.2 The s.42 report rejects these amendments and states that 'structures' are covered within the definition of building and REG activities are too broad to include in this rule.

6.7.3 It is in my opinion that as it is likely that REG activities and structures are required to be within 12m of high-voltage transmission lines and as electricity generation is not a network utility, REG activities need to be excluded to avoid unnecessary consents and to be more enabling for REG.

## 8.0 CONCLUSION

8.1 In conclusion, I support PC42 in most respects. I have identified some areas within the scope of Mercury's submissions and further submissions where I consider that PC42 can be improved further. Having regard to s32 of the RMA, I consider that my proposed amendments will result in more effective, efficient and appropriate provisions.

**Dated this 9<sup>th</sup> day of August 2023**

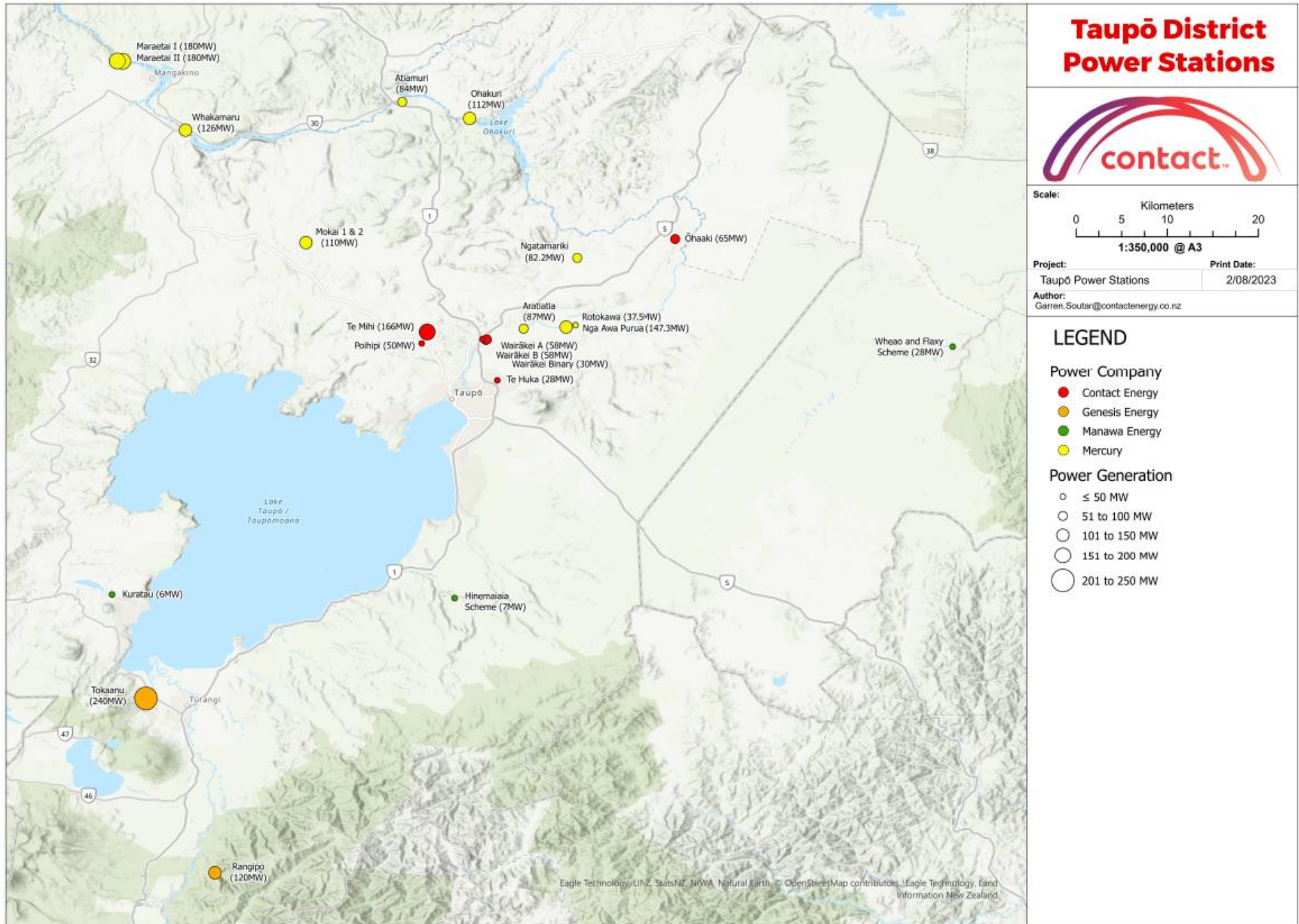


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**Hayley Stronge**

# Attachment 1 to Stronge planning evidence

## Plan of Renewable Electricity Generation sites in the Taupō District





## Attachment 2 to Stronge planning evidence



### S32AA EVALUATION – PC42

The following analysis is made under s32AA of the Act for the proposed changes to the General Rural Environment and the Rural Lifestyle Environment (PC42) provisions.

S32AA ANALYSIS FOR MERCURY SUBMISSION (ON PLAN CHANGE 42)	
Provisions	Evaluation
<p>Definition – <u>Renewable Electricity Generation</u></p> <p><u>Renewable Electricity Generation – means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources</u></p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>• No definition for Renewable Electricity Generation (REG) – unchanged - not preferable because:                             <ul style="list-style-type: none"> <li>- Without the definition of REG there would be reliance on the term ‘geothermal/electricity generation’ which does not reflect renewable energy.</li> <li>- The Taupo District Plan (TDC) would not be recognising the elevated status and importance of REG, as is identified in the National Policy Statement – Renewable Electricity Generation 2011 (NPS-REG).</li> </ul> </li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>• Definition will remain relevant and valid as it is included in the NPS-REG.</li> <li>• With its own definition it will not be confused with being part of another definition or activity in the rural environment (such as Rural Industry)</li> <li>• A definition of REG in the TDP assists in addressing the benefits that the NPS-REG seeks to achieve in decarbonisation.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>• The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to having no definition.</li> </ul>

Definition – Renewable Electricity Generation Activities

Renewable Electricity Generation Activities - means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

Alternative Options:

- No definition for Renewable Electricity Generation Activities (REG activities) – unchanged - not preferable because:
  - Without the definition of REG there would be reliance on the term ‘geothermal/electricity generation activities’ which does not reflect renewable energy.
  - The TDP would not be recognising the elevated status and importance of REG activities, as identified in the National Policy Statement – Renewable Electricity Generation 2011 (NPS-REG).

Benefits:

- Definition will remain relevant and valid as it is included in the NPS-REG.
- With its own definition it will not be confused with being part of another definition or activity in the rural environment (such as Rural Industry)
- The definition assists in addressing the benefits that the NPS-REG seeks to achieve in decarbonisation.

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to having no definition.

Definition - Rural Industry

Rural Industry - means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.

Alternative Options:

- Retain the definition of Rural Industry – unchanged - not preferable because:
  - The current definition includes the term ‘geothermal/electricity generation’ which is no longer relevant. The definition of REG appropriately sits on its own and is recognised in the NPS-REG.
  - The National Planning Standards 2019 (NPS) have been developed to improve the efficiency and effectiveness of the planning system in New

	<p>Zealand. The definition recommended for 'Rural Industry' is the same definition used in the NPS.</p> <ul style="list-style-type: none"> <li>- The TDP would not be recognising the elevated status and importance of REG, as identified in the National Policy Statement – Renewable Electricity Generation 2011 (NPS-REG).</li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>• Definition will remain relevant and valid as it is included in the National Planning Standards 2019.</li> <li>• The definition ensures that REG are to not be included as a Rural Industry.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>• The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to having no definition.</li> </ul>
<p>Definition - <u>Reverse sensitivity</u>  <u>Reverse Sensitivity is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.</u></p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>• No definition of Reverse Sensitivity – unchanged - not preferable because:             <ul style="list-style-type: none"> <li>- The risk with not being identified as a potential environment effect, is that reverse sensitivity may is not identified and assessed properly.</li> <li>- The definition recommended is the same definition used in the Waikato Regional Policy Statement (WRPS).</li> </ul> </li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>• Definition will remain relevant and valid as it is included in the WRPS.</li> <li>• The definition provides guidance to understand what reverse sensitivity is.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>• The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to having no definition.</li> </ul>

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Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources

Primary production and the use of natural resources are enabled by protecting the availability of the rural land and other resources and their productive capability.

Alternative Options:

- Retain Objective 3b.2.1 – unchanged - not preferable because:
- The existing objective does not cover a wider range of uses anticipated in the General Rural Environment (GRE) and the Rural Lifestyle Environment (RLE), such as REG.
- The TDP would not be giving effect to existing WRPS objective IM-02 and policy IM-P4 regarding ‘Significant Industry and Primary Production’.

Benefits:

- The objective will give effect to the WRPS objective IM-02 and policy IM-P4.
- The objective includes the use of natural resources which regularly occur in the Rural Environment and recognises REG’s are part of the rural environment.

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, and economic growth and employment, by enabling protection of rural land for primary production and natural resources, not just primary production.

Objective 3b.2.2 Maintaining the established General Rural character

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~ Enable a range of activities in the General Rural Environment that are compatible with and cumulatively do not erode rural character.

Alternative Options:

- Retain Objective 3b.2.2 – unchanged - not preferable because:
  - Does not ‘enable’ activities (such as subdivision and development) to occur which are compatible with the rural character.
  - The objective needs to be ‘enabling’ rather than trying to just ‘maintain’ the status quo.

Benefits:

- The objective is more ‘enabling’ for activities that are compatible with the rural character.
- Economic benefits from enabling other compatible activities to exist in the rural environment, rather than avoiding activities that only maintain the established character.

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	<p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, and economic growth and employment, by enabling a range of activities to exist that are compatible with rural character.</li> </ul>
<p>Policy 3b.2.9 <del>Maintaining the established</del> <u>Rural</u> character</p> <p><u>Enable activities in the <del>Maintain the established</del> General Rural Environment that will not compromise the character of the General Rural Environment, as defined by:</u></p> <p>a) <u>Extensive pastoral farming and forestry</u></p> <p>b) <u>Renewable Electricity Generation Activities</u></p> <p>c) <u>Geothermal areas and activities, electricity transmission and distribution</u></p> <p>d) Large open spaces between built structures</p> <p>e) A mix of residential and rural industry buildings</p> <p><del>e) Noises related to production activities during the day but low levels of noise at night</del></p> <p><del>d) Low levels of light spill</del></p> <p>f) <u>Effects from activities including noise, vibration, dust, odour and visual effects</u></p> <p><del>g) Infrequent vehicle movements to and from a site</del></p> <p>g) Limited signage that directly relates to the activity operating on the site.</p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>Retain Policy 3b.2.9 – unchanged - not preferable because: <ul style="list-style-type: none"> <li>Does not ‘enable’ activities to occur which do not compromise the character of the GRE.</li> <li>The objective needs to be ‘enabling’ rather than trying to just ‘maintain’ the status quo.</li> </ul> </li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>The objective is more ‘enabling’ for activities that do not compromise the GRE.</li> <li>Economic benefits from enabling other activities to exist in the rural environment, rather than avoiding activities that only maintain the established character.</li> <li>The policy includes specific activities, such as pastoral farming, forestry and REG activities that form part of the existing environment.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, and economic growth and employment, by enabling a range of activities to exist that do not compromise rural character.</li> </ul>
<p><u>Objective 3b.2.X Renewable Electricity Generation and Transmission Activities.</u></p> <p><u>Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment</u></p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>No new objective – unchanged - not preferable because: <ul style="list-style-type: none"> <li>A specific objective in the GRE is required to express the importance of REG activities helping NZ to achieve a reduction in green house gases.</li> <li>Without a specific objective and with no dedicated Energy Chapter, there would be inadequate policy coverage in the TDP.</li> </ul> </li> </ul>

	<p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>• Recognition that REG activities reduce green house gas emissions.</li> <li>• Specific provision is provided for REG and REG activities to locate in the rural environment where the majority currently exist and are part of the existing rural character.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>• The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, and economic growth and employment, by enabling the development, operation , maintenance and upgrading of REG in the GRE.</li> </ul>
<p>Objective 3b.2.4 Other Activities</p> <p>Maori cultural activities, tourism activities, <u>and</u> visitor accommodation <del>and</del> <del>renewable electricity generation and transmission activities</del> are enabled in <u>appropriate locations within</u> the General Rural Environment.</p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>• Retain Objective 3b.2.4 – unchanged - not preferable because: <ul style="list-style-type: none"> <li>- The objective does not need to include REG's because objective 3b.2.1 is recommended to be specific to REG activities.</li> <li>- This objective recognises that activities such as Maori cultural activities, tourist activities and visitor accommodation are considered to be 'sensitive' activities, however it is important in this objective to identify that these activities should be enabled specifically in 'appropriate locations'.</li> </ul> </li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>• Reduces the risk of potential reverse sensitivity effects occurring.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>• The costs are that these 'sensitive activities' are restricted to 'appropriate locations'. The costs overall however are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, by enabling sensitive activities to exist in 'appropriate locations' within the GRE.</li> </ul>

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Policy 3b.2.14 Commercial and industrial activity

Limit the scale of commercial and industrial activity (excluding rural industry and renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.

Alternative Options:

- Retain policy 3b.2.14 – unchanged - not preferable because:
  - The policy does not exclude rural industry and REG activities.
  - Does not recognise that REG activities are included in the definition of 'industrial' activities, so there needs to be an exclusion for the REG activity.

Benefits:

- Specific exclusion is provided for rural industry and REG activities to limit their scale in the rural environment as the rural environment is where the majority of these activities currently exist and are part of the existing rural character.

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, and economic growth and employment. This is due to 'rural industry' and 'REG' activities not being recognised as commercial and industrial activities that may impact on the availability of rural land.

Objective 3b.2.5 – Avoidance of reserve sensitivity

Reverse sensitivity effects on permitted, ~~and~~ legally established, and/or consented activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.

Alternative Options:

- Retain objective 3b.2.5 – unchanged - not preferable because:
  - The current objective does not include the reverse sensitivity effects from legally 'established and/or consented activities'. The current objective would not allow for consented activities that are not yet built.

Benefits:

- The recommended changes to this objective will provide for consented activities not yet built.

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP, and economic growth and employment.

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Policy 3b.2.10 - Residential units

Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:

- a) Increase the demand for community infrastructure and services
- b) Result in the inefficient use of land or loss of future flexibility for productive uses.
- c) Erode the general rural character through its density, scale and location.
- d) Result in the potential to generate reverse sensitivity effects.
- e) Constrain the ability to access or utilise renewable energy resources.

Alternative Options:

- Retain policy 3b.2.10 – unchanged - not preferable because:
  - Specific policy in the GLE is required limiting residential units where they create potential adverse effects.
  - Without a specific policy regarding reverse sensitivity and REG activities, and with no dedicated Energy Chapter, there would be inadequate policy coverage in the TDP.

Benefits:

- Recognition of potential reverse sensitivity effects from residential units in the GLE.
- Recognition to not constrain access and utilisation of REG's.

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to using the original policy.

Policy 3b.2.12 - Minor residential unit

Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.

Alternative Options:

- Retain policy 3b.2.12 – unchanged - not preferable because:
  - REG's exist across the GLE and in close proximity to RLE. Minor residential units are considered a 'sensitive activity' and consideration of reverse sensitivity in the GLE should be identified.

Benefits:

- Policy 3b.2.12 will allow for REG and REG activities to locate in the rural environment where the majority currently exist and are part of the existing rural character.
- Reverse sensitivity is identified highlighting it's importance when considering minor residential units.



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	<p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to using the original policy.</li> </ul>
<p>Policy 3b.3.12 Minor residential unit</p> <p>Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, <del>and</del> to further protect the character of the Rural Lifestyle Environment— <u>and to avoid reverse sensitivity effects.</u></p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>Retain policy 3b.3.12 – unchanged - not preferable because: <ul style="list-style-type: none"> <li>REG's exist across the GLE and in close proximity to RLE. Minor residential units are considered a sensitive activity and consideration of reverse sensitivity near the RLE should be identified.</li> </ul> </li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>Reverse sensitivity is identified highlighting it's importance when considering minor residential units.</li> </ul> <p><u>Costs:</u></p> <ul style="list-style-type: none"> <li>The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to using the original policy.</li> </ul>
<p>Rule 4b.1.4 Electricity Generation Core Sites, Renewable Electricity <del>Energy</del> Generation Activities and Geothermal Areas <del>Steamfield</del></p> <p>i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas <del>steamfield</del>, renewable <del>energy</del> electricity generation activities and associated structures and ancillary activities is a permitted activity.</p> <p>ii. <u>Activities associated with the investigation, identification and assessment of potential sites and energy sources for</u></p>	<p><u>Alternative Options:</u></p> <ul style="list-style-type: none"> <li>Retain rule 4b.1.4 – unchanged - not preferable because: <ul style="list-style-type: none"> <li>Without a specific objective and with no dedicated Energy Chapter, there is a reliance on the provisions of the GLE Chapter and the Strategic Directions Chapter for REG activities. Specific policies for REG and REG activities therefore need to be included in the GLE.</li> </ul> </li> </ul> <p><u>Benefits:</u></p> <ul style="list-style-type: none"> <li>Rule 4b.1.4 specifically provides for the investigation, identification and assessment of potential REG sites and energy sources in the GLE.</li> </ul>

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renewable electricity generation by existing and prospective generators are a permitted activity.

NOTE: For the purpose of this rule “maintenance” means: All activities associated with the protective care, ~~and monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor,~~ test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas

NOTE: For the purpose of this rule “minor upgrading” means: Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures ~~of similar character and scale,~~ and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. ~~up to 100m2 in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m2 in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.~~

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to using the original rule.

Rule 4b.1.7 Buildings and Structures in proximity to High voltage transmission lines

- i. Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of

Alternative Options:

- Retain rule 4b.1.7 – unchanged - not preferable because:

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a high-voltage transmission or sub transmission line is a restricted discretionary activity.

- REG structures are likely to be required to be built near high-voltage transmission lines, so REGs' should be excluded to avoid unnecessary consents.

Benefits:

- Specific provision is provided for REG activities to locate near high voltage transmission lines in the rural environment to provide for REG.

Costs:

- The costs are outweighed by the direct benefits to environmental, cultural and social well-being identified in the TDP. There is no less or greater opportunities for economic growth anticipated to be provided or reduced; or employment anticipated when compared to using the original rule.

Effectiveness and efficiency - The recommended changes promote a more efficient and clear pathway for which decision makers and plan users can assess proposed activities in the GRE and RLE.

Risk of acting or not acting - The risks of not acting as outlined, include a failure to recognise that REG and REG activities are a matter of national importance in the NPS-REG and that they play a significant role in New Zealand's successful transition to a low carbon economy.

## Attachment 3 to Stronge planning evidence

### Suggested amendments to PC42 provisions

#### Introductory note

The red, green and purple fonts below identify the following:

- **red font:** notified PC42 text;
- **green font:** s.42A report recommended changes;
- **purple font:** my suggested amendments.

Underlined is new text and strike-through deletes text.

#### PC42 – General Rural and Rural Lifestyle Environments

1. Include a new definition for Renewable Electricity Generation.

There was no notified version.

Renewable Electricity Generation – means generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.

2. Include a new definition for Renewable Electricity Generation Activities.

There was no notified version.

Renewable Electricity Generation Activities - means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.

3. Amend the definition of Rural Industry to read:

~~Rural Industry – an activity that directly supports, services, or is dependent on primary production and has a locational need to be within the General Rural Environment (rather than an urban environment). These activities include, but are not limited to; forestry, agriculture, dairy farming and geothermal/electricity generation.~~ means an industry or business undertaken

in a rural environment that directly supports, services, or is dependent on primary production.

4. Include a new definition for Reverse Sensitivity.

There was no notified version.

Reverse Sensitivity – means the potential for the operation of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment of other activities which are sensitive to the adverse environmental effects being generated by the pre-existing activity. is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.

5. Amend Objective 3b.2.1 to read:

**Objective 3b.2.1 Enable Primary Production and the Use of Natural Resources**

Primary production and the use of natural resources ~~its~~ are enabled by protecting the availability of ~~the~~ rural land and other resources and ~~its~~ their productive capability.

6. Delete objective 3b.2.2 and replace to read:

**Objective 3b.2.2 ~~Maintaining the established General Rural character~~**

~~The established character of the General Rural Environment is maintained and the cumulative erosion of its character through incremental subdivision and development is avoided.~~ Enable a range of activities in the General Rural Environment that are compatible with and cumulatively do not erode rural character.

7. Amend policy 3b.2.9 to read:

**Policy 3b.2.9 ~~Maintaining the established Rural character~~**

Enable activities in the ~~Maintain the established~~ General Rural Environment that will not compromise the character of the General Rural Environment, as defined by:

a) Extensive pastoral farming and forestry

- b) Renewable Electricity Generation Activities
- c) Geothermal areas and activities, electricity transmission and distribution
- ad) Large open spaces between built structures
- be) A mix of residential, visitor accommodation, tourism activity and rural industry buildings
- e) Noises related to production activities during the day but generally low levels of noise at night
- d) Low levels of light spill
- f) Effects from activities including noise, vibration, dust, odour and visual effects
- e) Generally infrequent vehicle movements to and from a site
- fg) Limited signage that directly relates to the activity operating on the site.
- gh) Odour and dust associated with primary production activities.

8. Include new objective, to read:

Objective 3b.2.X - Renewable Electricity Generation and Transmission Activities.

Enable the development, operation, maintenance and upgrading of renewable electricity generation activities and transmission activities in the General Rural Environment.

9. Amend objective 3b.2.4 to read:

Objective 3b.2.4 Other activities

Maori cultural activities, tourism activities, and visitor accommodation and renewable electricity generation and transmission (including sub transmission) activities are enabled in appropriate locations within the General Rural Environment.

10. Amend policy 3b.2.14 to read:

Limit the scale of commercial and industrial activity (excluding rural industry and renewable electricity generation activities) to avoid the uptake of general rural land by activities that are provided for in other Environments and may impact on the availability of land for primary production and other activities provided for within the General Rural Environment.

11. Amend objective 3b.2.5 to read:  
Objective 3b.2.5 – Avoidance of reserve sensitivity  
Reverse sensitivity effects on permitted, ~~and~~ legally established, and/or consented activities within the General Rural Environment, including conflict with activities in neighbouring Environments, are avoided.
12. Amend policy 2b.2.10 to read:  
Policy 3b.2.10 - Residential units  
Avoid the cumulative effects of rural lifestyle development by providing for these activities within the Rural Lifestyle Environment and otherwise limiting residential units within the General Rural Environment that:
- a) Increase the demand for community infrastructure and services
  - b) Result in the inefficient use of land or loss of future flexibility for productive uses
  - c) Erode the general rural character through its density, scale and location.
  - d) Result in the potential to generate reverse sensitivity effects.
  - e) Constrain the ability to access or utilise renewable energy resources.
13. Amend policy 3b.2.12 to read:  
Policy 3b.2.12 - Minor residential unit  
Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, and to ensure that the future availability of the rural land resource will not be compromised and to avoid the potential for reverse sensitivity effects.
14. Amend policy 3b.3.12 to read:  
Policy 3b.3.12 Minor residential unit  
Manage the scale and location of minor residential units to ensure it is near the principal dwelling on the allotment, is of a suitable size, ~~and~~ to further protect the character of the ~~Rural Lifestyle Environment.~~ and to avoid reverse sensitivity effects.

15. Amend rule 3b.1.4 to read:

Rule 4b.1.4 Electricity Generation Core Sites, Renewable Electricity Energy Generation Activities and Geothermal Areas ~~Steamfields~~

- i. Any activity involving continued operation, maintenance and minor upgrading of existing electricity generation core sites, geothermal areas ~~steamfield~~, renewable ~~energy~~ electricity generation activities and associated structures and ancillary activities is a permitted activity.
- ii. Activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators are a permitted activity.

NOTE: For the purpose of this rule “maintenance” means:

All activities associated with the protective care, and ~~monitoring of a hydro dam, a geothermal or hydroelectric power station, geothermal steamfields and associated structures, in order to monitor,~~ test and/or arrest the processes of decay, structural fatigue, erosion or dilapidation of all associated structures and includes maintenance of surrounds and water areas

NOTE: For the purpose of this rule “minor upgrading” means:

Structural improvement, repair and replacement or upgrade of components, or activities required for the continued safe and efficient operation including worn or technically deficient parts of any structure including the powerhouse, hydro dams, separation plants, switchyards, intake, control and diversion structures, wells, pipes, tunnels, cables, other equipment and accessory buildings and structures ~~of similar character and scale~~, and includes associated drilling, vehicles, infrastructure, machinery, testing, monitoring, earthworks and vegetation removal. Also the extension to existing Buildings and Structures, and the erection of new Buildings and Structures. up to 100m<sup>2</sup> in area and not exceeding the maximum height standard for the Rural Environment and the erection of any aerial, antennae or communication dish not exceeding 5m<sup>2</sup> in area located on top of a hydro or geothermal existing structure, subject to compliance with the Noise Performance Standard.



16. Amend rule 4b.1.7 to read:

Rule 4b.1.7 Buildings and Structures in proximity to High voltage  
transmission lines

- i.* Any building or structure (except network utilities and Renewable Electricity Generation Activities) located within 0 – 12 meters of a high-voltage transmission line or sub-transmission is a restricted discretionary activity.