

**From:** [Fraser Graafhuis](#)  
**To:** [RPS](#)  
**Subject:** Further Submissions on Otago Proposed Regional Policy Statement on behalf of Mercury NZ Ltd  
**Date:** Friday, 12 November 2021 1:48:56 p.m.  
**Attachments:** [image001.png](#)  
[20211112\\_OtagoPRPS\\_Fsubs\\_Mercury.pdf](#)  
[20211112\\_Form\\_OtagoRPS\\_Mercury\\_FSub.pdf](#)

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Please find attached Further Submissions on Otago Proposed Regional Policy Statement on behalf of Mercury NZ Ltd.

Please do not hesitate to contact me if you have any questions.

Regards

**FRASER GRAAFHUIS**

PLANNING AND POLICY ADVISOR

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## FURTHER SUBMISSIONS ON OTAGO PROPOSED REGIONAL POLICY STATEMENT Clause 8 of First Schedule, Resource Management Act 1991

To:

The Chief Executive

Otago Regional Council

Email: [rps@orc.govt.nz](mailto:rps@orc.govt.nz)

12<sup>th</sup> November 2021

### Further Submitter Details

Full name of submitter: **Mercury NZ Limited ("Mercury")**  
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HAMILTON 3240*  
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### Further Submissions

Mercury is a person who has an interest in the proposal that is greater than the interest of the public generally. Mercury's primary interest relates the Mahinerangi Wind Farm on the north side of Lake Mahinerangi, around 50 km west of Dunedin, in Otago, New Zealand, as well as the general the use and development of renewable energy resources within the Otago Region, which contribute to New Zealand's transition to a low carbon economy and meeting New Zealand's climate change obligations.

Mercury makes the further submissions as set out in the following table.

Mercury **wishes to be heard** in support of its further submissions.

If others make a similar submission, Mercury **will** consider presenting a joint case with them at the hearing.

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Fraser Graafhuis  
**Planning and Policy Advisor**  
Mercury NZ Limited

Submitter Number	Submitter Name	Submitter + Submission point number	Chapter	Provision	Position	Summary of Decision Requested by Merury NZ Ltd	Support / Oppose	Reason	Decision Sought
137	Director-General of Conservation	137.040	IM – Integrated management	IM – P2	Support	Retain as notified	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.042	IM – Integrated management	IM – P6	Amend	Amend as follows or words to like effect: “...and reliable partial data, <u>taking into account the precautionary principle in accordance with IM – P15</u> ”	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.044	IM – Integrated management	IM – P10	Amend	Amend as follows, or words to like effect: (1) minimise the effects of climate change processes or risks to existing activities <u>and the environment,</u> (2) <u>prioritise avoiding avoid the establishment of new activities...</u> ”	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.097	EIT – Energy, infrastructure and transport	EIT – EN – General	Support	Retain EIT – EN 0 O1 to EIT – EN – O3 as notified, except to either amend Objective EIT – EN – O2, or add a new objective, to specifically recognise the benefits of new renewable energy generation.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.100	EIT – Energy, infrastructure and transport	EIT – EN – P2	Amend	Amend as follows, or words to like effect: “...1. Recognise the national, regional and local benefits of <u>existing renewable electricity generation activities,</u> take into account the needs to <u>at least maintain current renewable electricity generation capacity and to provide for increased capacity to enable a shift from non – renewable energy and ...</u> ”	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.101	EIT – Energy, infrastructure and transport	EIT – EN – P3	Amend	Amend as follows, or words to like effect: “The security <u>benefits of renewable electricity generation supply is are maintained or improved...</u> ”	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.102	EIT – Energy, infrastructure and transport	EIT – INF – O4	Amend	Amend EIT – INF – O4 to ensure that adverse effects are required to be minimised in all cases.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.103	EIT – Energy, infrastructure and transport	EIT – INF – O5	Amend	Amend EIT – INF – O5 to ensure that adverse effects are required to be minimised in all cases	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.104	EIT – Energy, infrastructure and transport	EIT – INF – P10	Amend	Amend as required for consistency with relief sought for EIT – INF – O4 and O5.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
137	Director-General of Conservation	137.105	EIT – Energy, infrastructure and transport	EIT – INF – P11	Amend	Amend as required for consistency with relief sought for EIT – INF – O4 and O5.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought

137	Director-General of Conservation	137.106	EIT – Energy, infrastructure and transport	EIT – INF – P12	Amend	Amend as required for consistency with relief sought for EIT – INF – O4 and O5.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Disallow relief sought
137	Director-General of Conservation	137.107	EIT – Energy, infrastructure and transport	EIT – INF – P13	Amend	Amend as required for consistency with relief sought for EIT – INF – O4 and O5. Amend EIT – INF – P13, or insert a new policy, to address new infrastructure within the coastal environment, in accordance with the relevant provisions of the NZCPS.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Disallow relief sought
137	Director-General of Conservation	137.108	EIT – Energy, infrastructure and transport	EIT – INF – P14	Amend	Amend as required for consistency with relief sought for EIT – INF – O4 and O5.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Disallow relief sought
137	Director-General of Conservation	137.109	EIT – Energy, infrastructure and transport	EIT – INF – P15	Amend	Amend as required for consistency with relief sought for EIT – INF – O4 and O5.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Disallow relief sought
137	Director-General of Conservation	137.158	APP3 – Criteria for biodiversity offsetting	Replace APP 3 with the Criteria attached below as Attachment 3 to this submission [Have sought criteria for biodiversity offsetting – see original submission for detail]	Amend	Replace APP 3 with the Criteria attached below as Attachment 3 to this submission [Have sought criteria for biodiversity offsetting – see original submission for detail]	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Disallow relief sought
137	Director-General of Conservation	137.159	APP4 – Criteria for biodiversity compensation	Replace APP 4 with the Criteria attached below as Attachment 4 to this submission [Have sought criteria for biodiversity compensation – see original submission for detail]	Amend	Replace APP 4 with the Criteria attached below as Attachment 4 to this submission [Have sought criteria for biodiversity compensation – see original submission for detail]	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Disallow relief sought
201	Central Otago District Council (CODC)	201.026	EIT – Energy, infrastructure and transport	EIT – EN – P6	Support	Support in principle including provision for the offsetting of effects	Support	Mercury seeks to ensure offsetting of effects is a key policy mechanism to achieve positive environmental outcomes. An avoidance approach is not supported, and will not help New Zealand achieve climate change outcomes.	Provide for relief sought
201	Central Otago District Council (CODC)	201.027	EIT – Energy, infrastructure and transport	EIT – EN – P8	Support	Support in principle provision for small community scale electricity generation activities.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Provide for relief sought
201	Central Otago District Council (CODC)	201.028	EIT – Energy, infrastructure and transport	EIT – INF – O4	Support	Support providing for efficient and resilient infrastructure.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets</u> .	Provide for relief sought

201	Central Otago District Council (CODC)	201.03	EIT – Energy, infrastructure and transport	EIT – INF – P13	Support	Support avoidance of new infrastructure in areas with high ecological, cultural, heritage landscape and amenity values.	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
231	Otago Fish & Game Council and the Central South Island Fish & Game Council	231.004	GEN – General Submission	General	Amend	Amend provisions to require the RPS to take a hierarchical approach, with a priority on the natural environment [specific relief not stated]	Oppose	Mercury supports the enhancement and regeneration of indigenous biodiversity in New Zealand. Mercury considers mitigation of climate change needs to considered to ensure long term survival of indigenous habitat and fauna. This needs to be reconciled within a biodiversity strategy, which is over arching.	Disallow relief sought
231	Otago Fish & Game Council and the Central South Island Fish & Game Council	231.005	GEN – General Submission	Terminology	Amend	Amend provisions to remove ambiguous and unclear wording and replace with consistent, directive terms [specific relief not stated]	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
231	Otago Fish & Game Council and the Central South Island Fish & Game Council	231.084	EIT – Energy, infrastructure and transport	EIT – EN – O2	Amend	Amend as follows: The generation capacity of renewable electricity generation activities in Otago: (1) is maintained <u>across the region</u> and, if practicable <u>maximised increased, but only where it is consistent within environmental limits, and</u>	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
231	Otago Fish & Game Council and the Central South Island Fish & Game Council	231.088	EIT – Energy, infrastructure and transport	EIT – EN – M1	Amend	Amend as follows: ... <del>(4) provide for the operation and maintenance of existing renewable electricity generation activities, including their natural and physical resource requirements, within the environmental limits, and</del>	Oppose	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets.</u>	Disallow relief sought
306	Meridian Energy Limited	306.001	EIT – Energy, infrastructure and transport	Effects management hierarchy	Amend	Amend as follows: <del>“has the same meaning as in clause 3.21 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below)</del> <del>and in this RPS also applies to natural wetlands</del> (1) in relation to natural inland wetlands, rivers, means an approach to managing the adverse effects of an activity on the extent or values of a natural wetland, or river or lake (including cumulative effects and loss of potential value) that requires means that: (a) adverse effects are avoided where practicable, and (b) where adverse effects cannot be avoided, they are minimised where practicable, and (c) where adverse effects cannot be minimised, they are remedied where practicable, and (d) where more than minor residual adverse effects cannot be avoided, minimised, or remedied, aquatic offsetting is provided, and (e) if aquatic offsetting of more than minor residual adverse effects is not practicable, aquatic compensation is provided; and (ef) if aquatic compensation is not appropriate, the activity itself is avoided. (2) in relation to managing the adverse effects of renewable electricity generation activities on the extent or values of a natural wetland, river or lake (including cumulative effects and loss of potential value) means that: (a) adverse effects are avoided, remedied or mitigated where practicable, and (b) where the adverse effects cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.004	TERP – Definitions	Regionally significant infrastructure	Support	Retain as notified the following: “(2) electricity sub-transmission infrastructure, (3) renewable electricity generation facilities that connect with the local distribution network but not including renewable electricity generation facilities designed and operated principally for supplying a single premise or facility”.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
306	Meridian Energy Limited	306.005	TERP – Definitions	Renewable electricity generation	Support	Retain as notified	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought

306	Meridian Energy Limited	306.006	TERP – Definitions	Renewable electricity generation activities	Amend	Amend as follows: “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	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
306	Meridian Energy Limited	306.012	TERP – Definitions	New definition – Upgrade	Amend	Amend as follows: <u>“Upgrade means activities to bring existing structures up to current standards or to improve the functional characteristics of structures, provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity.</u> Within the footprint of authorised renewable electricity generation activities, upgrade also means <u>increasing the generation or transmission capacity, or the efficiency or security of regionally significant infrastructure; and replacing ancillary structures”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.051	EIT – Energy, infrastructure and transport	EIT – EN – O1	Amend	Amend as follows” Delete the notified version of EIT – EN – O1 AND Insert the following: <u>“Renewable electricity generation activities in Otago:</u> <u>1. provide for the energy needs of Otago’s communities and economy ;</u> <u>2. reduce overall greenhouse gas emissions; and</u> <u>contribute to the achievement of New Zealand’s national target for renewable electricity generation.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.052	EIT – Energy, infrastructure and transport	EIT – EN – O2	Oppose	Amend as follows: Delete the notified version of EIT – EN – O21 AND insert the following:	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
306	Meridian Energy Limited	306.053	EIT – Energy, infrastructure and transport	EIT – EN – P1	Amend	Amend as follows: “The operation and maintenance of existing renewable electricity generation activities is <del>provided for enabled while minimising adverse effects”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
306	Meridian Energy Limited	306.054	EIT – Energy, infrastructure and transport	EIT – EN – P2	Amend	Amend as follows: “Decisions on the allocation and use of natural and physical resources, including the use of fresh water and development of land: (1) recognise <u>and provide for the national significance of renewable electricity generation activities,</u> including the national, regional and local benefits <del>relevant to, of existing renewable electricity generation activities;</del> (2) <del>take into account have particular regard to the need to at least maintain current renewable electricity generation capacity and that this may require protection of the assets, operational capacity and continued availability of the renewable energy resource,</del> and (3) recognise that the attainment of increases in renewable electricity generation capacity will require significant development of renewable electricity generation activities <u>and that such development will need to be located where the renewable energy source is available.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.055	EIT – Energy, infrastructure and transport	EIT – EN – P3	Amend	Amend as follows: “The security of renewable electricity supply is maintained or improved in Otago <del>through appropriate provision by enabling existing renewable electricity generation activities and providing for the</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought

306	Meridian Energy Limited	306.056	EIT – Energy, infrastructure and transport	EIT – EN – P4	Amend	Amend as follows: “Provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation <del>and, when selecting a site for new renewable electricity generation, prioritise those where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.</del> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <del>emissions reduction budgets.</del>	Provide for relief sought
306	Meridian Energy Limited	306.057	EIT – Energy, infrastructure and transport	EIT – EN – P6	Amend	Amend as follows: “Manage the adverse effects of renewable electricity generation activities by: (1) applying EIT – INF – P13, (2) having <u>particular</u> regard to: (a) the functional need to locate renewable electricity generation activities where resources are available, (b) the operational need to locate where it is possible to connect to the National Grid or <del>electricity sub – transmission infrastructure, and</del>	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
306	Meridian Energy Limited	306.058	EIT – Energy, infrastructure and transport	EIT – EN – P7	Amend	Amend as follows: “Activities that may result in reverse sensitivity effects <del>on renewable electricity generation activities</del> , or compromise <del>the operation or maintenance of renewable electricity generation activities, are, as the first priority, prevented from establishing, and only if that is not reasonably practicable, are managed so that reverse sensitivity effects are minimised.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <del>emissions reduction budgets.</del>	Provide for relief sought
306	Meridian Energy Limited	306.059	EIT – Energy, infrastructure and transport	EIT – EN – New – Provision	Amend	Amend as follows: Insert a new policy in the EIT – EN chapter as follows: <u>“EIT – EN – P# Contravening environmental bottom lines and limits for renewable electricity generation activities</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <del>emissions reduction budgets.</del>	Provide for relief sought
306	Meridian Energy Limited	306.060	EIT – Energy, infrastructure and transport	EIT – EN – New – Provision	Amend	Insert as follows: <u>“EIT – EN – P# EIT – EN Objectives and policies preside</u> <u>Where conflict arises between the implementation of EIT – EN objectives and policies, and the objectives and policies in other sections of this regional policy statement, the EIT – EN objectives and policies preside.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and <del>emissions reduction budgets.</del>	Provide for relief sought
306	Meridian Energy Limited	306.061	EIT – Energy, infrastructure and transport	EIT – EN – M1	Amend	Amend as follows: “Otago Regional Council must prepare or amend and maintain its regional plans to: (1) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation, (2) <del>require the prioritisation of sites for new renewable electricity generation activities where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised;</del> (3) ... (4) <del>provide for enable the operation and maintenance of existing renewable electricity generation activities, including their natural and physical resource requirements, within the environmental limits, and</del> (5) restrict the establishment of activities that may <del>result in reverse sensitivity effects on</del> adversely <del>affect the efficient functioning of renewable electricity generation activities or compromise renewable electricity generation activities</del> infrastructure (including impacts on generation capacity);	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought

306	Meridian Energy Limited	306.062	EIT – Energy, infrastructure and transport	EIT – EN – M2	Amend	Amend as follows: “Territorial authorities must prepare or amend and maintain their district plans to: (1) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation, <del>(2) require the prioritisation of sites for new renewable electricity generation activities where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised;</del> (3) ... (4) <del>provide for enable the continued operation and maintenance of renewable electricity generation activities on the surface of rivers and lakes and on land outside the coastal marine area and the beds of lakes and rivers;</del> (5) restrict the establishment <del>or occurrence of activities that may result in reverse sensitivity effects on adversely affect the efficient functioning of renewable electricity generation activities or compromise renewable electricity generation activities.</del> (6) require the design of subdivision development to optimise solar gain, including through roading, lot size, dimensions, layout and orientation, and (7) require design of transport infrastructure that provides for multi – modal transport options in urban and rural residential locations.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.064	EIT – Energy, infrastructure and transport	EIT – INF – General	Amend	Amend as follows: Insert a guidance note before Objective EIT – INF – O4 as follows: <u>“The EIT – INF provisions of this RPS do not apply to infrastructure that is part of renewable electricity generation activities. The EIT – EN provisions of this RPS apply to infrastructure that is part of renewable electricity generation activities.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.068	NFL – Natural features and landscapes	NFL – O1	Amend	Amend as follows: “NFL – O1 – Outstanding <del>and highly valued natural features and landscapes</del> The areas and values of Otago's outstanding <del>and highly valued natural features and landscapes</del> are identified, and the use and development of Otago's natural and physical resources results in: <del>(1) the protection of outstanding natural features and landscapes, and</del> <del>(2) the maintenance or enhancement of highly valued natural features and landscapes.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.069	NFL – Natural features and landscapes	NFL – P1	Amend	Amend as follows: In order to manage outstanding <del>and highly valued natural features and landscapes</del> , identify: (1) the areas and values of outstanding <del>and highly valued natural features and landscapes</del> in accordance with APP9, and (2) the capacity of those natural features and landscapes to accommodate use or development while protecting the values that contribute to the natural feature and landscape being considered <del>outstanding or highly valued.</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.070	NFL – Natural features and landscapes	NFL – P3	Amend	Delete.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <del>emissions reduction budgets.</del>	Provide for relief sought
306	Meridian Energy Limited	306.071	NFL – Natural features and landscapes	NFL – P4	Amend	Amend as follows	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <del>emissions reduction budgets.</del>	Provide for relief sought



306	Meridian Energy Limited	306.073	NFL – Natural features and landscapes	NFL – General	Amend	Amend as follows: For NFL – M, NF - E, NFL – PR and NFL – AER, delete all references to highly valued natural features and landscapes in the NFL methods, explanations, principal reasons and anticipated environmental results	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.074	NFL – Natural features and landscapes	NFL – New provision	Amend	Amend as follows: Insert the following new policy after NFL – P6: <u>“Despite policies NFL – P2 to NFL – P5 (inclusive), manage effects on natural features, landscapes and seascapes in a way that recognises and provides for the national significance of renewable electricity generation activities, and provides for their development, operation, upgrading, and maintenance by:</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.081	APP2 – Significance criteria for indigenous biodiversity		Amend	Amend as follows: Title of APP2 as follows: <u>“Significance criteria for indigenous biodiversity Criteria for identifying significant natural areas.”</u> AND Representative criteria (a) to read as follows: <u>“(a) An area of significant indigenous vegetation and significant habitats of indigenous fauna that is an example of an indigenous vegetation type, or habitat that is typical or characteristic of the original natural diversity of the relevant ecological district or coastal marine biogeographic region. This may include degraded examples of their type or represent all that remains of indigenous vegetation and habitats of indigenous fauna in some areas.”</u> AND <u>Representative criteria (b) to clarify its intent</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.082	APP3 – Criteria for biodiversity offsetting		Amend	Amend as follows: Meridian seeks that (1)(b) of APP3 be amended to remove the term “ <i>reasonably measurable</i> ” and to instead adopt “ <i>measurable</i> ”. It is not clear how reasonably measurable would differ from measurable. AND Meridian seeks deletion of the term “ <i>positive</i> ” from criteria 2(e). This recognises that the other criteria require, as a minimum, no-net loss in indigenous biodiversity, and prevents criteria 2(e) being read as if enhancement of indigenous biodiversity outcomes is a compulsory requirement of offsetting. Meridian seeks that Criteria 2(f) is amended for the same reasons, that is, offsetting should be an option to achieve no-net-loss; and/or enhancement of indigenous biodiversity. AND further to the above, and as set out with respect to LF-WAI-P3, Meridian seeks the replacement of “ <i>possible</i> ” with “ <i>practicable</i> ”. AND Amend APP3 (2)(f) as follows: “APP3 – Criteria for <u>indigenous</u> biodiversity offsetting (1) <u>Indigenous biodiversity offsetting is not available if the activity will result in:</u> (a) the loss of any individuals of Threatened taxa, other than kākūka (Kunzea robusta and Kunzea serotina), under the New Zealand Threat Classification System (Townsend et al, 2008), or (b) <u>reasonably measurable loss within the ecological district to an At Risk – Declining taxon, other than mānuka</u> (Leptospermum scoparium), under the New Zealand Threat Classification System (Townsend et al, 2008). (2) <u>Indigenous biodiversity offsetting is available if the following criteria are met:</u> (a) the offset addresses <u>significant</u> residual adverse effects that remain after implementing the sequential steps	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

306	Meridian Energy Limited	306.083	APP4 – Criteria for biodiversity compensation		Amend	Amend APP4 as follows: “APP4 – Criteria for <u>indigenous</u> biodiversity compensation (1) <del>Indigenous biodiversity compensation is not available if the activity will result in:</del> (a) the loss of an indigenous taxon (excluding freshwater fauna and flora) or of any <u>indigenous</u> ecosystem type from an ecological district or coastal marine biogeographic region, (b) removal or loss of viability of habitat of a Threatened or At Risk indigenous species of fauna or flora under the New Zealand Threat Classification System (Townsend et al, 2008), (c) removal or loss of viability of a naturally rare or uncommon <u>indigenous</u> ecosystem type <del>that is associated with indigenous vegetation or habitat of indigenous fauna, or</del> (d) worsening of the New Zealand Threat Classification System (Townsend et al, 2008) conservation status of any Threatened or At Risk indigenous fauna. (2) <del>Indigenous biodiversity compensation is available if the following criteria are met:</del> (a) compensation addresses only residual adverse effects that remain after implementing the sequential steps required by ECO – <del>P6P5(1) to (4)</del> ; (b) compensation is undertaken where it will result in the best practicable outcome and preferably: (i) close to the location of the activity, and (ii) within the same ecological district or coastal marine biogeographic region, (c) compensation achieves <del>positive indigenous biodiversity outcomes that would not have occurred without that compensation,</del> (d) the <del>positive indigenous biodiversity outcomes of the compensation are enduring,</del> (e) the time delay between the loss of <u>indigenous</u> biodiversity through the proposal and the gain or maturation of the compensation’s biodiversity outcomes is the least necessary to achieve the best <del>possible practicable outcome,</del> (f) ...”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.086	GEN – General Submission	General	Amend	Amend as follows: Redress the Proposed Otago Regional Policy Statement June 2021 ( <b>pORPS21</b> ) not adequately giving effect to the National Policy Statement for Renewable Electricity Generation 2011 ( <b>NPSREG</b> ) and Policy 4 of the National Policy Statement for Freshwater Management 2020 ( <b>NPSFM</b> ); and does not respond sufficiently to the need for action to address climate change.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets</u> .	Provide for relief sought
306	Meridian Energy Limited	306.088	IM – Integrated management	EIT – EN – New – Provision	Amend	Amend as follows: Insert a new objective as follows: “The management of natural and physical resources in Otago recognises and provides for the national significance of renewable electricity generation activities, including their contribution within the Otago region and nationally to displacing greenhouse gas emissions and associated climate change, and increasing electricity generation capacity and security of supply”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.092	EIT – Energy, infrastructure and transport	EIT – EN – New – Provision	Amend	Amend as follows: Insert a new objective in the Energy section of the Energy, Infrastructure and Transport chapter as follows: <u>“Renewable electricity generation activities in Otago:</u> <u>a) provide for the energy needs of Otago’s communities and economy;</u> <u>b) reduce overall greenhouse gas emissions; and</u> <u>c) contribute to the achievement of New Zealand’s national target for renewable electricity generation”;</u>	Support	More renewable electricity generation is needed to support New Zealand’s transitions to a low carbon economy, which includes electrification of all energy use, currently fueled by energy from fossil fuels.	Provide for relief sought
306	Meridian Energy Limited	306.093	EIT – Energy, infrastructure and transport	EIT – General	Amend	Amend as follows: Ensure that existing renewable electricity generation activities are enabled, and new renewable electricity generation activities are provided for; and that both offsetting and environmental compensation are amongst the effects management options available to renewable electricity generation activities (as listed in Part 3 of the submission).	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.094	EIT – Energy, infrastructure and transport	EIT – EN – New – Provision	Amend	Amend as follows: Insert new provision to clarify the relationship between the provisions in the Energy section of the Energy, Infrastructure and Transport chapter, and the other provisions in the pORPS21 by inserting the following new policy: <u>“Where conflict arises between the implementation of EIT – EN objectives and policies, and the objectives and policies in other sections of this regional policy statement, the EIT – EN objectives and policies preside.”;</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

306	Meridian Energy Limited	306.095	EIT – Energy, infrastructure and transport	EIT – INF – General	Amend	Amend as follows: Clarify that the EIT – INF sub – chapter of the pORSP21 does not apply to renewable electricity generation activities by inserting the following: <u>“The EIT – INF provisions of this RPS do not apply to infrastructure that is part of renewable electricity generation activities. The EIT – EN provisions of this RPS apply to infrastructure that is part of renewable electricity generation activities.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
306	Meridian Energy Limited	306.096	EIT – Energy, infrastructure and transport	EIT – INF – General	Amend	Amend as follows: Clarifying that the EIT – INF sub – chapter of the pORSP21 does not apply to renewable electricity generation activities by inserting the following <u>“The EIT – INF provisions of this RPS do not apply to infrastructure that is part of renewable electricity generation activities. The EIT – EN provisions of this RPS apply to infrastructure that is part of renewable electricity generation activities.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.001	GEN – General Submission	Terminology	Amend	Amend as follows Throughout the document replace the word ‘energy’ with the word <u>‘electricity’</u> wherever there are references to renewables.	Oppose in Part	Mercury considers the use of the term energy is relevant when referring to the natural energy resource. Where energy is utilised for generation purposes, electricity is appropriate.	Disallow relief sought
311	Trustpower Limited	311.030	EIT – Energy, infrastructure and transport	EIT – EN – O1	Amend	Amend as follows: <u>“The health and wellbeing</u> of Otago’s communities and economy are supported by renewable energy generation within the region that is safe, secure, and resilient.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.031	EIT – Energy, infrastructure and transport	EIT – EN – O2	Amend	Amend as follows: “The generation capacity of renewable electricity generation activities in Otago: (1) is <u>protected</u> and maintained and, if practicable, <u>increased, maximised within environmental limits and</u> (2) contributes to meeting New Zealand’s national target for renewable electricity generation <u>and climate change commitments.</u> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.033	EIT – Energy, infrastructure and transport	EIT – EN – P1	Amend	Amend as follows: Reword name of policy to “Operation, maintenance <u>and upg radi ng</u> ” . AND Amend policy as follows: <u>“Protect</u> <del>The operation and maintenance of existing renewable electricity generation activities, and provide for their operation, maintenance and upgrading, including maintenance of generation output and protection of operational capacity is provided for while minimising its adverse effects.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.034	EIT – Energy, infrastructure and transport	EIT – EN – P2	Amend	Amend as follows: Reword policy name: <del>“Recognising and providing for renewable electricity generation activities in decision-making.”</del> Reword the policy: <u>Recognise and provide for renewable electricity generation, by ensuring that d</u> <del>Decisions on the allocation and use of natural and physical resources, including the use of fresh water and development of</del> and (1) recognise the national, regional and local benefits of existing renewable electricity generation activities, (2) <u>protect the generation output and operational capacity of existing renewable electricity generation activities,</u> (3) provide for <del>take into account the need the ability to, at least, maintain current renewable electricity generation capacity and maintain the availability of the resource for this purpose, and</del> (3) recognise <u>the need to increase the installed capacity of renewable electricity generation assets and</u> that the attainment of increases in renewable electricity generation capacity <del>will may require significant development of renewable electricity generation activities.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.035	EIT – Energy, infrastructure and transport	EIT – EN – P3	Amend	Amend as follows: <del>“The security and installed capacity of renewable electricity supply is <u>protected</u>, maintained or improved increased in Otago through appropriate provision for the upgrade of existing renewable electricity generation activities and the development or upgrading of renewable electricity generation activities, and including diversification of the type or location of electricity generation activities.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought

311	Trustpower Limited	311.036	EIT – Energy, infrastructure and transport	EIT – EN – P4	Amend	Amend as follows: “Provide for activities associated with the investigation, identification and assessment development of potential sites and energy sources for renewable electricity generation and, when selecting a site for new renewable electricity generation, prioritise those where significant adverse effects on: highly valued natural and physical resources <u>(a) areas of outstanding natural character,</u> <u>(b) natural wetlands and outstanding water bodies, (c) outstanding natural features and landscapes,</u> <u>(d) areas of significant indigenous vegetation and significant habitats of indigenous fauna,</u> <u>(e) areas of historic heritage and</u> <u>(f) mana whenua values</u> can be, <u>where practicable,</u> avoided or, at the very least, remedied, mitigated, offset or where environmental compensation can be considered	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.037	EIT – Energy, infrastructure and transport	EIT – EN – P6	Amend	Amend as follows: “Manage the adverse effects of new or upgraded: renewable electricity generation activities by <del>(1) applying EIT – INF – P13, (2) (1) having regard to:</del> (a) the functional, <u>technical and geographic</u> need to locate renewable electricity generation activities where resources are available, <u>and</u> (b) the operational need to locate where it is possible to connect to the National Grid or electricity sub – transmission infrastructure, and (c) <del>the extent and magnitude of adverse effects on the environment and the degree to which unavoidable adverse effects can be remedied or mitigated, or residual adverse effects are offset or compensated for; and</del> (2) requiring consideration of alternative sites, methods and designs, and: (a) <u>avoiding, remedying or mitigating significant adverse effects on any identified values that contribute to the area’s importance, and</u> (b) offsetting or compensation measures (in accordance with any specific requirements for their use in this RPS), where adverse effects <u>are potentially significant or irreversible cannot be avoided, remedied or mitigated”</u>	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
311	Trustpower Limited	311.038	EIT – Energy, infrastructure and transport	EIT – EN – P7	Amend	Amend as follows: <del>“Avoid the establishment or operation of activities, including the abstraction of water, that may result in reverse sensitivity effects or compromise the operation or maintenance of renewable electricity generation activities are; as the first priority, prevented from establishing and only if that is not reasonably practicable, managed so that reverse sensitivity effects are minimised.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.039	EIT – Energy, infrastructure and transport	EIT – EN – New – Provision	Amend	<u>“EIT – EN – P10 Climate Change Mitigation</u> <u>Where a proposed renewable electricity generation activity provides, or will provide, enduring regionally,</u> <u>or nationally significant mitigation of climate change impacts, with commensurate benefits for the well –</u> <u>being of people and communities and the wider environment, decision makers may, at their discretion,</u> <u>allow non – compliance with an environmental bottom line set in any policy or method of this RPS or in</u> <u>a Land and Water Plan, only if they are satisfied that:</u> <u>(1) the activity is designed and carried out to avoid, remedy or mitigate adverse effects as far as is consistent with its purpose and functional needs,</u> <u>(2) the activity is consistent with other regional and national climate change mitigation activities, and</u> <u>(3) where adverse effects on the environment cannot be avoided, remedied, or mitigated, decision makers shall have regard to offsetting measures environmental compensation including measures or compensation which benefit the local environment and community affected”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

311	Trustpower Limited	311.040	EIT – Energy, infrastructure and transport	EIT – EN – M1	Amend	<p>Amend as follows:</p> <p>“Otago Regional Council must prepare or amend and maintain its regional plans to:</p> <p>(1) <u>provide for the ongoing operation, maintenance and upgrading of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity,</u> provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation;</p> <p>(32) <u>require the prioritisation of sites for new renewable electricity generation activities where significant adverse effects on those areas set out in EN – P4 highly valued natural features and landscapes and mana whenua values can be, where practicable, avoided, or, at the very least, remedied, mitigated, offset or environmentally compensation considered highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised,</u> (4) <u>provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of renewable electricity generation activities;</u></p> <p>(52) <u>manage the adverse effects of new or upgraded developing or upgrading renewable electricity generation activities in accordance with EN – P6 that:</u></p> <p>(a) are within the beds of lakes and rivers and the coastal marine area, or</p> <p>(b) involve the taking, use, damming or diversion of water and discharge of water or contaminants.</p> <p>(4) <u>provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of renewable electricity generation activities;</u></p> <p>(6)</p> <p>(5) <u>restrict avoid the establishment or operation of activities that may result in reverse sensitivity effects or compromise the operation or maintenance of renewable electricity generation activities or adversely affect the efficient functioning of renewable electricity generation infrastructure (including impacts on generation capacity).”</u></p>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.041	EIT – Energy, infrastructure and transport	EIT – EN – M2	Amend	<p>Amend as follows</p> <p>“Territorial authorities must prepare or amend and maintain their regional plans to:</p> <p>(1) <u>provide for the ongoing operation, maintenance and upgrading of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity,</u></p> <p>(2) provide for activities associated with the investigation, identification and assessment development of potential sites and energy sources for renewable electricity generation,</p> <p>(32) <u>require the prioritisation of sites for new renewable electricity generation activities where significant adverse effects on those areas set out in EN – P4 highly valued natural features and landscapes and mana whenua values can be, where practicable, avoided, or, at the very least, remedied, mitigate d, offset or environmentally compensation considered highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimized</u></p> <p>(4) <u>provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of renewable electricity generation activities,</u></p> <p>(53) manage the adverse effects of new or upgraded resources and mana whenua values can be avoided or, at the very least, minimised,</p> <p>(4) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of renewable electricity generation activities</p> <p>65) restrict avoid the establishment or operation of activities that may result in reverse sensitivity effects or compromise the operation or maintenance of renewable electricity generation activities or adversely affect the efficient functioning of renewable electricity generation infrastructure (including impacts on generation capacity).</p> <p>(6) (7) require the design of subdivision development to optimise solar gain, including through road design, lot size, dimensions, layout and orientation, and</p> <p>(7) (8) require design of transport infrastructure that provides for multi – modal transport options in urban and rural residential locations.”</p>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

311	Trustpower Limited	311.042	EIT – Energy, infrastructure and transport	EIT – EN – E1	Amend	<p>Amend as follows:</p> <p>“The policies in this section are designed to set a clear preference for renewable electricity generation activities contributing to meeting New Zealand’s national target for renewable electricity generation.</p> <p><u>Renewable electricity generation is a matter of national importance and a key component in responding to climate change and energy demands. Increasing energy security will assist</u> with ensuring that communities have options for clean heat and <u>electricity for health and wellbeing services.</u></p> <p>Renewable electricity generation activities are promoted by providing for the <u>development, investigation, operation, and maintenance and upgrading of existing and new assets, these sites and ensuring that decisions on allocating natural resources and the use of land, for example, recognise the benefits of renewable electricity generation activities arising from maintaining or increasing generation capacity. It is noted that renewable electricity generation activities will come within the definition of infrastructure, and that provisions relating to infrastructure also apply. The upgrading of existing assets and the development of new generation capacity is provided for to recognise the importance of renewable electricity and the benefits it provides nationally, regionally and locally.</u></p> <p>The <u>potential magnitude of adverse effects and functional and operational needs associated with renewable electricity generation activities is recognised by requiring consideration of those needs, and the extent to which unavoidable effects associated with upgrading or developing new renewable electricity generation activities can be remedied or mitigated is also a key consideration. Where residual adverse effects remain, consideration is to be given to proposals to offset these, or compensate for them.</u></p> <p><u>Increasing energy security will assist with ensuring that communities have options for clean heat. To ensure the ongoing functionality of assets and to maximise their benefits, reverse sensitivity effects or activities that may compromise the operation or maintenance of renewable electricity generation activities are to be avoided or their impacts minimised.</u></p> <p>The policies also seek that energy use is efficient and energy waste is reduced, which will have consequential effects on minimising Otago’s contribution to the nation’s greenhouse gas emissions.”</p>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.044	EIT – Energy, infrastructure and transport	EIT – EN – PR1	Amend	<p>Amend as follows:</p> <p>“Energy is a basic requirement of life in Otago. It enables communities to provide for their well – being, and health and safety, and is essential to the regional economy. Everyday life is significantly affected when energy supply is disrupted. Therefore, ensuring the security of energy supplies that meet demand is crucial. The ability of existing <u>energy renewable electricity generation activities to continue operating is dependent on access to resources such as water in hydro lakes and the operator’s ability to maintain existing infrastructure.</u></p> <p>.....</p> <p><u>“Renewable electricity generation facilities can may cause significant adverse effects on the environment because of their functional need to locate in particular areas. These areas are where resources are available, for example water for hydro – electricity generation, but they may also contain other significant values such as outstanding natural features or landscapes, significant indigenous vegetation or sites of significance to mana whenua values. In some situations, it may not be possible to avoid, remedy or mitigate significant adverse effects on these significant values after considering alternative sites or design options. In these circumstances the effects should be remedied or mitigated, and consideration should be given to whether those residual effects that cannot be avoided are offset or compensated.”</u></p>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.045	EIT – Energy, infrastructure and transport	EIT – EN – AER3	Amend	<p>Amend as follows:</p> <p>“The adverse effects associated with renewable energy generation activities are <u>minimised, avoided, remedied or mitigated, or where appropriate, offset or compensated for.</u>”</p>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.046	EIT – Energy, infrastructure and transport	EIT – INF – P10	Support	Retain as notified	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

311	Trustpower Limited	311.047	EIT – Energy, infrastructure and transport	EIT – INF – P13	Amend	Amend as follows: Clarify that EIT – INF – P13 does not apply to renewable electricity generation. AND “When providing for new infrastructure outside the coastal environment: (1) avoid, as the first priority, locating infrastructure in all of the following ..... (e ) areas of <u>high or outstanding natural character</u> , (f) <u>areas or places of significant or outstanding historic heritage</u> (g) (f) <u>(wāhi tapu, wāhi taoka, and areas with protected customary rights, and</u> (h) <u>areas of high recreational and high amenity value, and ...”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.048	EIT – Energy, infrastructure and transport	EIT – INF – P15	Support	Retain as notified	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.049	EIT – Energy, infrastructure and transport	EIT – INF – M4	Amend	Amend as follows: “..... (2) require the prioritisation of sites for infrastructure, <u>other than renewable electricity generation activities</u> , where adverse effects on highly valued natural and physical 311.0 resources and mana whenua values can be avoided or, at the very least, minimised.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.050	EIT – Energy, infrastructure and transport	EIT – INF – M5	Amend	Amend as follows: “..... (7) require the prioritisation of sites, <u>other than for renewable electricity generation activities</u> , where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.051	EIT – Energy, infrastructure and transport	EIT – INF – M6	Amend	Amend as follows: Delete Clause (1) and renumber accordingly.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.052	EIT – Energy, infrastructure and transport	EIT – INF – E2	Amend	Amend as follows: First sentence of the explanation as to read as follows: “The policies in this section <u>apply to infrastructure other than renewable electricity generation activities</u> <u>(which are subject to the provisions of EIT – EN), and</u> recognise the critical importance ....”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.063	APP2 – Significance criteria for indigenous biodiversity		Amend	Amend as follows: APP2 to align with current best practice.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.064	APP3 – Criteria for biodiversity offsetting		Amend	Amend as follows: APP3 to align with current best practice.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

311	Trustpower Limited	311.065	APP4 – Criteria for biodiversity compensation		Amend	Amend APP4 to align with current best practice.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.066	APP9 – Identification criteria for outstanding and highly valued natural features, landscapes and		Amend	Amend as follows: APP4 to align with current best practice.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.067	EIT – Energy, infrastructure and transport	EIT – EN – General	Amend	There is a need to ensure a coordinated policy response to insure there is recognition and development of plan provisions at regional and local scales that provide for existing or future renewable electricity generation.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.068	GEN – General Submission	General	Amend	Amend as follows: Trustpower recognises the need for a clear and directive Regional Policy Statement that addresses all matters of Regional Significance and clearly sets out anticipated outcomes for regional and district plans.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
311	Trustpower Limited	311.069	GEN – General Submission	General	Support	Trustpower notes that whilst its submission supports the intent of the pRPS to provide clarity in decision making; the current approach to priorities, hierarchy and integrated management appears flawed and as currently formed is likely to result in confusion and misinterpretation which needs to be addressed.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.0057	GEN – General Submission		Amend	Amend as follows: Make all required alternative or consequential relief as may be necessary to fully give effect to this submission arising from specific amendments on the submission AND For the avoidance of doubt, such consequential relief may include the need to amend or alter Explanation text and/or Principal Reasons text to reflect the purpose or intent of relief sought in respect of Objectives, Policies or Methods.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.031	EIT – Energy, infrastructure and transport	EIT – INF – New – Provision	Amend	Amend as follows: Insert a new Policy in EIT – INF that sets out specific direction in respect of managing effects of the National Grid that, in the event of conflict, prevails over policies in the ECO section of the Proposed ORPS. OR Amend Policy ECO – P6 as follows: “Maintain Otago’s indigenous biodiversity (excluding the coastal environment and areas managed under ECO – P3) by applying the following biodiversity effects management hierarchy in decision – making on applications for resource consent and notices of requirement: 1. avoid adverse effects as the first priority, or seek to avoid adverse effects in the case of the National Grid, 2. where adverse effects demonstrably cannot be completely avoided, they are remedied, 3. where adverse effects demonstrably cannot be completely avoided or remedied, they are mitigated, 4. where there are residual adverse effects after avoidance, remediation, and mitigation, then <u>an applicant or requiring authority may offer or agree to offset</u> the residual adverse effects are offset in accordance with APP3, and 5. if biodiversity offsetting of residual adverse effects is not possible, then: a. <u>an applicant or requiring authority may offer or agree to compensate</u> for the residual adverse effects are compensated for in accordance with APP4; and b. <u>if the residual adverse effects cannot be compensated for in accordance with APP4, the activity is avoided.</u> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought



314	Transpower New Zealand Limited	314.033	EIT – Energy, infrastructure and transport	EIT – INF – O4	Amend	Amend as follows: “Effective, efficient and resilient infrastructure enables the people and communities <u>of Otago to provide for their social and cultural well – being, their health and safety, and supports sustainable economic development and growth within the region within environmental limits.</u> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.034	EIT – Energy, infrastructure and transport	EIT – INF – O5	Amend	Amend as follows: “Development of nationally and regionally significant infrastructure is <u>coordinated with, as well as land use change so that the operation and use of the infrastructure is efficient and, occurs in a co—</u> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.042	EIT – Energy, infrastructure and transport	EIT – INF – AER7	Amend	Amend as follows: “Nationally and regionally significant infrastructure is protected from <u>adverse effects, including</u> reverse sensitivity effects caused by incompatible activities.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.043	EIT – Energy, infrastructure and transport	EIT – INF – AER8	Amend	Amend as follows: “The adverse effects associated with nationally and regionally significant infrastructure are <u>managed minimised.</u> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.055	EIT – Energy, infrastructure and transport	EIT – INF – New – Provision	Amend	Amend as follows Consider use of amendments proposed in at submission point 0314.015 in this section of the PORPS	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.057	EIT – Energy, infrastructure and transport	EIT – INF – New – Provision	Amend	Amend as follows: Insert a new Policy in EIT – INF that sets out specific direction in respect of the management of the potential adverse effects of the maintenance, upgrade and development of the National Grid that, in the event of conflict, prevails over policies in the HCV section of the Proposed ORPS. AND Cross reference Policy between HCV – WT – P2 (Submission Point 00314.045) and EIT – INF (Submission Point 00314.57)	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
314	Transpower New Zealand Limited	314.058	EIT – Energy, infrastructure and transport	EIT – INF – New – Provision	Amend	Amend as follows: Insert a new Policy in EIT – INF that sets out specific direction in respect of the management of the potential adverse effects of the maintenance, upgrade and development of the National Grid. AND Cross reference Policy between HCV – WT – P5 (Submission Point 00314.046) and EIT – INF	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

315	Aurora Energy Limited	315.015	SRMR – Significant resource management issues for the region	New – Provision	Amend	Amend as follows: Add a new significant resource management issue addressing the extent to which the aspirations, challenges and resource management issues are supported by a well – functioning electricity distribution network, suggested drafting as follows: <u>SRMR – IX</u> <u>Resilient electricity supply is critical to the health, wellbeing and prosperity of Otago, particularly in a adapting to climate change.</u> <u>Statement</u> <u>Electricity supply is essential to our way of life. It supports community wellbeing, health, safety and economic prosperity.</u> <u>It also has a critical role to play in adapting to climate change by supporting communities to become less reliant on fossil fuels for heating and transport. As such there will be a need for electricity network providers to undertake significant development and upgrades to support the communities needs in the future.</u> <u>Context</u> <u>Otago’s electricity supply comprises electricity generation (primarily from hydro – electricity generation); transmission through the National Grid; distribution from grid – exit points to zone substations, electricity sub – transmission infrastructure and finally through the distribution network to consumers.</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.035	ECO – Ecosystems and indigenous biodiversity	ECO – P3	Amend	Amend as follows: Delete OR Amend by adding a carve out for infrastructure in which the policy framework of EIT – INF applies, including by adding the following text: <u>“or, in the case of infrastructure, adverse effects are managed in accordance with EIT – INF – P 13.”</u> OR Amend as necessary to give effect to the NPSIB.	Support	Mercury supports the enhancement and regeneration of indigenous biodiversity in New Zealand. Mercury considers mitigation of climate change needs to be considered to ensure long term survival of indigenous habitat and fauna. This needs to be reconciled within a biodiversity strategy, which is overarching.	Provide for relief sought
315	Aurora Energy Limited	315.036	ECO – Ecosystems and indigenous biodiversity	ECO – P4	Amend	Amend as follows: Delete OR Amend by adding a carve out for infrastructure in which the policy framework of EIT – INF applies, including by adding the following text: <u>“or, in the case of infrastructure, adverse effects are managed in accordance with EIT – INF – P 13.”</u> OR Amend as necessary to give effect to the NPSIB.	Support	Mercury supports the enhancement and regeneration of indigenous biodiversity in New Zealand. Mercury considers mitigation of climate change needs to be considered to ensure long term survival of indigenous habitat and fauna. This needs to be reconciled within a biodiversity strategy, which is overarching.	Provide for relief sought
315	Aurora Energy Limited	315.037	ECO – Ecosystems and indigenous biodiversity	ECO – P5	Amend	Amend as follows: Delete OR Amend by adding a carve out for infrastructure in which the policy framework of EIT – INF applies, including by adding the following text: <u>“or, in the case of infrastructure, adverse effects are managed in accordance with EIT – INF – P 13.”</u>	Support	Mercury supports the enhancement and regeneration of indigenous biodiversity in New Zealand. Mercury considers mitigation of climate change needs to be considered to ensure long term survival of indigenous habitat and fauna. This needs to be reconciled within a biodiversity strategy, which is overarching.	Provide for relief sought
315	Aurora Energy Limited	315.038	ECO – Ecosystems and indigenous biodiversity	ECO – P6	Amend	Amend as follows: Delete OR Amend by adding a carve out for infrastructure in which the policy framework of EIT – INF applies, including by adding the following text: <u>“or, in the case of infrastructure, adverse effects are managed in accordance with EIT – INF – P 13.”</u> OR Amend as necessary to give effect to the NPSIB.	Support	Mercury supports the enhancement and regeneration of indigenous biodiversity in New Zealand. Mercury considers mitigation of climate change needs to be considered to ensure long term survival of indigenous habitat and fauna. This needs to be reconciled within a biodiversity strategy, which is overarching.	Provide for relief sought
315	Aurora Energy Limited	315.040	ECO – M5	ECO – M5	Amend	Amend as follows: Delete reference to “ECO – P3”. AND Amend (2) as follows: “ ... (2) control the clearance or modification of indigenous vegetation, including where required to provide for the ongoing operation, maintenance and upgrade of infrastructure.” “ ...”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

315	Aurora Energy Limited	315.041	ECO – Ecosystems and indigenous biodiversity	ECO – General	Amend	Amend as follows: For provisions ECO – E1; ECO – PR1, give effect to ECO – Ecosystems and indigenous biodiversity related submissions referenced in the full submission document as ‘the above relief’; with respect to: • Principal reasons: LF – FW – PRS Explanation: ECO – E1 • Principal reasons: ECO – PR1 AND For provisions ECO – P3 at submission point 00315.035, given effect to amendments to ECO – M4 for the relief sought.	Support	Mercury supports the enhancement and regeneration of indigenous biodiversity in New Zealand. Mercury considers mitigation of climate change needs to be considered to ensure long term survival of indigenous habitat and fauna. This needs to be reconciled within a biodiversity strategy, which is over arching.	Provide for relief sought
315	Aurora Energy Limited	315.043	EIT – Energy, infrastructure and transport	EIT – INF – O4	Amend	Delete, or Amend as follows: Amend to remove the wording “within environmental limits” in this provision and elsewhere in RPS21.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.044	EIT – Energy, infrastructure and transport	EIT – INF – O5	Support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.045	EIT – Energy, infrastructure and transport	EIT – INF – O6	Amend	Amend as follows: “Long – term investment in, and planning for the <u>national grid and distribution network</u> <del>electricity transmission infrastructure, and its integration with land use, is sustained.</del> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.046	EIT – Energy, infrastructure and transport	EIT – INF – P10	Amend	Amend as follows: “Decision making on the allocation or use of natural and physical resources must take into account the <u>functional and operational needs</u> of nationally and regionally significant infrastructure.”	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
315	Aurora Energy Limited	315.047	EIT – Energy, infrastructure and transport	EIT – INF – P11	Amend	Amend as follows: Delete “ECO – P4” OR any consequential amendments required to give effect to the NPSIB. AND Otherwise retain policy.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.048	EIT – Energy, infrastructure and transport	EIT – INF – P12	Amend	Amend as follows: “Provide for upgrades to, and development of, <del>nationally or regionally significant infrastructure while ensuring that:</del> <del>1) infrastructure is it is designed and located, as far as practicable, to maintain functionality during and after natural hazard events;</del> <del>2) it is, as far as practicable, co – ordinated with long – term land use planning; and</del> <del>3) increases efficiency in the delivery, operation and use of the infrastructure is efficient.”</del> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

315	Aurora Energy Limited	315.049	EIT – Energy, infrastructure and transport	EIT – INF – P13	Amend	Delete policy, or replace the policy as follows : “Provide for new infrastructure outside the coastal environment by: (1) avoiding, as the first priority, locating infrastructure in all of the following: a. significant natural areas, b. outstanding natural features and landscapes, c. natural wetlands, d. outstanding water bodies, e. areas of high or outstanding natural character, f. areas or places of significant or outstanding historic heritage, g. wāhi tapu, wāhi taoka, and areas with protected customary rights, and h. areas of high recreational and high amenity value, or, 2) <u>if it is not possible to avoid locating in the areas listed in (1) because of the functional or operational needs of infrastructure, manage adverse effects as follows:</u> <u>a. in natural wetlands, in accordance with the relevant provisions in the NESF, and b.</u> <u>for other locations applying the effects management hierarchy (other matters).”</u>	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
315	Aurora Energy Limited	315.051	GEN – General Submission	EIT - General	Amend	Amend as follows (throughout the RPS) Given effect to any further or consequential relief required in the event of conflict between submissions on EIT – INF – P13 (Submission Point 00315.049) and any other policy in the regional policy statement so that EIT – INF – P13 applies.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.052	EIT – Energy, infrastructure and transport	EIT – INF – P13	Amend	Delete , or amend policy by adding a new (3) as follows: “ .... <u>(3) by taking into account the functional and operational needs of infrastructure.”</u>	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
315	Aurora Energy Limited	315.055	EIT – Energy, infrastructure and transport	EIT – INF – P17	Support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.057	EIT – Energy, infrastructure and transport	EIT – INF – M4	Amend	Amend as follows: “...(2) require the prioritisation of sites for infrastructure where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or minimised <u>to the extent practicable.</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.058	EIT – Energy, infrastructure and transport	EIT – INF – M5	Amend	Amend as follows: “Local authorities must: 1) <del>advocate encourage for the upgrading or replacement of existing nationally or regionally significant infrastructure if the operation of infrastructure results in significant adverse effects;</del> and 2) work proactively with infrastructure providers to co – ordinate the upgrading or development of nationally or regionally significant infrastructure to: a. support co – location or concurrent construction to reduce adverse effects; <u>Initiate a private plan change to remedy the significant adverse effects.</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
315	Aurora Energy Limited	315.083	APP3 – Criteria for biodiversity offsetting		Amend	Amend as follows: Remove limits as to when offsetting can be offered in clause (1). OR Otherwise align to achieve consistency with national direction via the Draft NPSIB. AND Amend the offsetting requirements and outcomes so as to achieve consistency with recommended best practice for offsetting and/or national direction via the Draft NPSIB.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

315	Aurora Energy Limited	315.084	APP4 – Criteria for biodiversity compensation		Amend	Amend as follows: Remove limits as to when biodiversity compensation can be offered in clause (1). Or otherwise align to achieve consistency with national direction via the Draft NPSIB. Amend the compensation requirements and outcomes so as to achieve consistency with recommended best practice for compensation and/or national direction via the Draft NPSIB.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.020	APP2 – Significance criteria for indigenous biodiversity		Amend	Amend as follows: Ensure the significance criteria for indigenous biodiversity in APP2 to ensure they are specific and targeted to avoid the inclusion of inappropriate areas within SNAs. AND Ensure consistency with best practice or national policy direction when finalising this criteria.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.021	APP3 – Criteria for biodiversity offsetting		Amend	Amend as follows: Remove limits as to when offsetting can be offered in clause (1). OR Amend to otherwise align to achieve consistency with national direction via the Draft NPSIB. AND Remove the offsetting requirements and outcomes so as to achieve consistency with recommended best practice for offsetting and/or national direction via the Draft NPSIB.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.022	APP4 – Criteria for biodiversity compensation		Amend	Amend as follows: Remove limits as to when biodiversity compensation can be offered in clause (1). OR Otherwise align to achieve consistency with national direction via the Draft NPSIB. AND Amend the compensation requirements and outcomes so as to achieve consistency with recommended best practice for compensation and/or national direction via the Draft NPSIB.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.023	EIT – Energy, infrastructure and transport	EIT – EN – O1	Amend	Retain, or amend by strengthening the Objective.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.024	EIT – Energy, infrastructure and transport	EIT – EN – O2	Amend	Amend as follows: “The generation capacity of renewable electricity generation activities in Otago: (1) is <u>protected and</u> maintained and, <del>if practicable, where appropriate increased, maximised within environmental limits, and</del> (2) contributes in full to meeting New Zealand’s national target for renewable electricity generation <u>and climate change commitments.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.025	EIT – Energy, infrastructure and transport	EIT – EN – P1	Amend	Amend as follows: <u>“Protect</u> <del>The operation and maintenance of existing renewable electricity generation activities, and provide for their operation, maintenance and upgrading, including maintenance of generation output and protection of operational capacity is provided for while minimising its adverse effects.”</del>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.026	EIT – Energy, infrastructure and transport	EIT – EN – P2	Amend	Amend as follows: “Decisions on the allocation and use of natural and physical resources, including the use of fresh water and development of land:	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.027	EIT – Energy, infrastructure and transport	EIT – EN – P3	Amend	Amend as follows: “The security <u>and installed capacity</u> of renewable electricity supply is <u>protected</u> , maintained or <del>improved</del> <u>increased in Otago through appropriate provision for the upgrade of existing renewable electricity generation activities and the development or upgrading of renewable electricity generation activities, and including diversification of the type or location of electricity generation activities.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

318	Contact Energy Limited	318.028	EIT – Energy, infrastructure and transport	EIT – EN – P4	Amend	Amend as follows: “Provide for activities associated with the investigation, identification and assessment development of potential sites and energy sources for renewable electricity generation and, when selecting a site for new renewable electricity generation, prioritise those where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.029	EIT – Energy, infrastructure and transport	EIT – EN – P6	Amend	Amend as follows: Delete clauses (1) and (3).	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
318	Contact Energy Limited	318.030	EIT – Energy, infrastructure and transport	EIT – EN – P7	Amend	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.031	EIT – Energy, infrastructure and transport	EIT – INF – O4	Amend	Amend as follows: “Effective, efficient and resilient infrastructure enables the people and communities of Otago to provide for their social and cultural wellbeing, their health and safety, and supports sustainable economic development and growth within the region within environmental limits.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.032	EIT – Energy, infrastructure and transport	EIT – INF – P11	Amend	Delete OR Otherwise develop a new policy that actually “allows for the operation and maintenance of existing nationally and regionally significant infrastructure”.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.033	EIT – Energy, infrastructure and transport	EIT – INF – P13	Oppose	Delete.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.034	NFL – Natural features and landscapes	NFL – P2	Amend	Amend as follows: “Protect outstanding natural features and landscapes from inappropriate subdivision, use and development by: (1) Avoiding significant adverse effects on the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, and (2) Avoiding, remedy or mitigating other adverse effects.”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
318	Contact Energy Limited	318.035	NFL – Natural features and landscapes	NFL – P3	Amend	Delete: OR Amend so as to achieve the following: “Maintain or enhance highly valued natural features and landscapes by: (1) Avoiding significant adverse effects on the values of the natural feature or landscape, and (2) Avoiding, remedying or mitigating other adverse effects: <u>Avoiding, remedying or mitigating adverse effects.”</u>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.039	EIT – Energy, infrastructure and transport	EIT – EN – O1	Amend	Retain as notified Subject to amendments consequential on other amendments sought by the submitter	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

321	New Zealand Infrastructure Commission	321.040	EIT – Energy, infrastructure and transport	EIT – EN – O2	Amend	Amend as follows: “The generation capacity of renewable electricity generation activities in Otago: (1) is maintained and, if practicable maximised, within environmental limits that can be met through offsetting and compensation measures and (2) contributes to meeting New Zealand’s national target for renewable electricity generation <u>and the 2050 Target.</u> ” OR Words to similar effect	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.041	EIT – Energy, infrastructure and transport	EIT – EN – O3	Amend	Retain as notified	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
321	New Zealand Infrastructure Commission	321.042	EIT – Energy, infrastructure and transport	EIT – EN – P1	Amend	Amend as follows: Remove requirement to ‘minimise’ adverse effects	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.043	EIT – Energy, infrastructure and transport	EIT – EN – P2	Amend	Amend as follows: Strengthen the policy support for increasing renewable electricity generation capacity.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and <u>emissions reduction budgets.</u>	Provide for relief sought
321	New Zealand Infrastructure Commission	321.044	EIT – Energy, infrastructure and transport	EIT – EN – P3	Amend	Amend as follows: Provision should be broadened to apply to the capacity (rather than just security) of renewable electricity supply, and/or combined with Policy EIT – EN – P2 so as to provide strong support for increasing both security and capacity.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.046	EIT – Energy, infrastructure and transport	EIT – EN – P5	Amend	Amend as follows: ‘Formula’ to “generally discourage” is more appropriate than “avoid” (which may be taken to require prohibited activity status at the plan level).	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.047	EIT – Energy, infrastructure and transport	EIT – EN – P6	Amend	Amend as follows: Policy only to apply to managing the effects of new renewable electricity generation activities.	Support	Consideration of functional and operational needs of infrastructure is sought, where effects on other values are unable to be avoided.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.048	EIT – Energy, infrastructure and transport	EIT – EN – P7	Amended	Amend as follows: “Activities that may result in reverse sensitivity effects or compromise the operation or maintenance of renewable electricity generation activities are, as the first priority, prevented from establishing and only if that is not reasonably practicable, managed so that reverse sensitivity effects are minimised <u>and effects on the operation or maintenance of renewable electricity generation are avoided.</u> ”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought

321	New Zealand Infrastructure Commission	321.049	EIT – Energy, infrastructure and transport	EIT – EN – P8	Support	Retain as notified	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.050	EIT – Energy, infrastructure and transport	EIT – EN – P9	Support	Retain as notified	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.051	EIT – Energy, infrastructure and transport	EIT – INF – O4	Amend	Delete the reference to development being within environmental limits. OR Provide a definition of ‘environmental limits’ consistent with that contained in the NBA Exposure Draft, i.e. to confirm that such limits: <ul style="list-style-type: none"> <li>only apply to ecological integrity or human health (not more amorphous or subjective values such as amenity, character, or landscape)</li> <li>must be set by, or in strict accordance with, national direction</li> <li>can be met through offsetting and compensation.</li> </ul>	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.052	EIT – Energy, infrastructure and transport	EIT – INF – O5	Support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.054	EIT – Energy, infrastructure and transport	EIT – INF – P10	Support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.055	EIT – Energy, infrastructure and transport	EIT – INF – P11	Support	Delete the policy or revise to be more enabling of operation and maintenance of all infrastructure.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.056	EIT – Energy, infrastructure and transport	EIT – INF – P12	Amend	Retain as notified Subject to amendments consequential on other amendments sought by the submitter that provide clarity as to the extent to which it prevails over policies in other topics.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.057	EIT – Energy, infrastructure and transport	EIT – INF – P13	Amend	Amend as follows: Revise the policy to adopt a threshold of “reasonably practicable” rather than the current threshold of “possible”, at Clause (2).	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.058	EIT – Energy, infrastructure and transport	EIT – INF – P14	Amend	Amend as follows: “When considering proposals to develop or upgrade infrastructure: (1) require consideration of alternative sites, methods and/or designs if adverse effects are potentially significant or irreversible, and (2) utilise the opportunity of substantial upgrades of infrastructure to reduce adverse effects that result from the existing infrastructure, including on sensitive activities <u>where appropriate</u> .”	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.059	EIT – Energy, infrastructure and transport	EIT – INF – P15	Amend	Amend as follows: Consistent with the need to give effect to the NPSET, EIT – INF – P15 should be amended so that: <ul style="list-style-type: none"> <li>the requirement or direction is strengthened: “seek to avoid” is not as strong as (in effect) ‘avoid to the extent reasonably possible’</li> </ul> the focus is on avoiding both reverse sensitivity and direct effects on the operation, maintenance, upgrading, and development of the electricity transmission network.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand met its climate change obligations and emissions reduction budgets.	Provide for relief sought



321	New Zealand Infrastructure Commission	321.060	EIT – Energy, infrastructure and transport	EIT – INF – P16	Amend	Amend as follows: Consistent with the need to give effect to the NPSET, EIT – INF – P16 should be amended: <ul style="list-style-type: none"> <li>Clarify Clause (2), which appears intended to reflect NPSET Policy 3 (technical and operational requirements of the network) but is somewhat muddled in referring to “constraints on” the operational and technical needs of the transmission network. It would be more sensible to just recognise/consider the constraints associated with the technical and operational requirements of the network (or, ‘operational and functional needs’, if that language is preferred)</li> <li>Clause 5 (reflecting NPSET Policy 7) should perhaps be elevated to a standalone policy direction.</li> </ul> AND as Policy 7 NPSET focusses on the planning and development of the transmission system (in essence, deciding where to put new lines/assets); it should not be read as requiring complete avoidance of all effects on town centres (which is the effect of this wording, taken out of context, in clause (5)).	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.061	EIT – Energy, infrastructure and transport	EIT – INF – P17	support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which	Provide for relief sought
321	New Zealand Infrastructure Commission	321.063	EIT – Energy, infrastructure and transport	EIT – TRAN – O8	support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which	Provide for relief sought
321	New Zealand Infrastructure Commission	321.066	EIT – Energy, infrastructure and transport	EIT – TRAN – P18	support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.067	EIT – Energy, infrastructure and transport	EIT – TRAN – P19	support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought
321	New Zealand Infrastructure Commission	321.068	EIT – Energy, infrastructure and transport	EIT – TRAN – P20	support	Retain as notified.	Support	Mercury seeks to ensure the RPS provides for the use and development of infrastructure, including renewable electricity generation. The National Policy Statement for Renewable Electricity Generation must be given effect to by the RPS, which will help New Zealand meet its climate change obligations and emissions reduction budgets.	Provide for relief sought