

**BEFORE THE HEARING PANEL APPOINTED  
BY THE OTAGO REGIONAL COUNCIL**

**UNDER** The Resource Management Act  
1991 (**Act** or **RMA**)

**IN THE MATTER** of an original submission on the  
Proposed Regional Policy  
Statement for Otago 2021  
(**PORPS**)

**BETWEEN** **AURORA ENERGY LIMITED**  
**Submitter 0315**  
**NETWORK WAITAKI LIMITED**  
**Submitter 0320**  
**POWERNET LIMITED**  
**Submitter 0511**

**AND** **OTAGO REGIONAL COUNCIL**  
**Local Authority**

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**REBUTTAL EVIDENCE OF MEGAN JUSTICE ON BEHALF OF AURORA  
ENERGY LIMITED, NETWORK WAITAKI LIMITED AND POWERNET LIMITED**

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## REBUTTAL EVIDENCE OF MEGAN JUSTICE ON BEHALF OF AURORA ENERGY LIMITED, NETWORK WAITAKI LIMITED AND POWERNET LIMITED

### 1. Introduction

- 1.1 My name is Megan Justice. My background, experience and qualifications are set out in my evidence in chief dated 23 November 2022.
- 1.2 The purpose of this evidence is to demonstrate how the stand-alone Energy Chapter supported by the renewable energy generation companies could incorporate provisions for electricity transmission, sub transmission and distribution.

### 2. Energy Chapter

- 2.1 As I have described in my evidence in chief, I consider that the concept of having all the energy related infrastructure provisions in a separate sub-chapter of the Proposed Otago Regional Policy Statement 2021 (**PORPS**) to be a logical and efficient means of managing this important infrastructure. The rationale for having a separate Energy sub-chapter (**Energy Chapter**) is that it will provide a comprehensive set of provisions that address the needs of the energy sector and assist in ensuring the community is supplied with this essential utility, whilst ensuring the environmental effects of the industry are appropriately managed. This holistic approach to managing the energy supply network infrastructure is reflective of the electricity distribution companies ("**EDBs**") collaboration with renewable electricity generators at a national level to ensure policies are in place to deliver the Government's decarbonisation goals.
- 2.2 The planning evidence filed on behalf of Manawa Energy<sup>1</sup>, Contract Energy Limited<sup>2</sup> and Meridian Energy Limited<sup>3</sup> on the PORPS supports a stand-alone, all-inclusive chapter for Energy and Electricity activities, and these parties have collaborated on developing a set of provisions to provide policy direction for the development and management of renewable energy generation activities in Otago. I refer to these parties as the "Renewable Electricity Generators" or simply "REGs" in this brief of evidence. I have been involved in these discussions on behalf of the electricity distribution businesses PowerNet Limited, Network Waitaki Limited and Aurora Energy Limited

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<sup>1</sup> Evidence in Chief of Stephanie Styles, 23 November 2022.

<sup>2</sup> Evidence in Chief of Claire Hunter, 23 November 2022.

<sup>3</sup> Evidence in Chief of Susan Ruston, 23 November 2022.

(EDBs). I agree with the evidence for the REGs for the stand-alone energy chapter. I reiterate that in my view, a stand-alone energy sub-chapter in the PORPS has the potential to provide a comprehensive set of provisions to ensure the sustainable management of nationally and regionally significant infrastructure and other electricity infrastructure; whilst also providing efficiencies for resource users and decision makers when seeking to develop or manage energy resources by collating all the relevant regional policies that apply to these activities in one place.

- 2.3 To assist the Commissioners, enclosed with this evidence as **Appendix A** is a version of the proposed Energy Chapter (that is supported by the REGs) which combines the relief sought by the REGs and EDBs as well as to demonstrate how this chapter could include provisions relating to the transmission, sub transmission and distribution of electricity throughout Otago.
- 2.4 The provisions that I have included in the Energy Chapter derive from the provisions I have supported in my evidence in chief which are included in the EIT chapter of the PORPS. However, it is apparent following receipt of evidence from other infrastructure providers that there is a need to avoid duplication between the proposed Energy Chapter and the existing INF Chapter. Therefore, I consider that amendments are required to some of the provisions to ensure the provisions are specific to the electricity distribution network.<sup>4</sup> The amendment I have suggested includes replacing the work 'infrastructure' with 'the National Grid', 'sub transmission' and 'electricity distribution' in an updated version of EIT-INF-O4; EIT-INF-O6; EIT-INF-P15, EIT-INF-P17 and EIT-INF-AER7.
- 2.5 With the benefit of considering the Energy Chapter as a whole, I consider that some refinements are required to the relief I sought in my evidence in chief for policies EIT-INF-P15 and EIT-EN-P10. In my view, it is more efficient to incorporate parts of policy EIT-EN-P10 into an electricity distribution specific version of policy EIT-INF-P15. Part of the reason for this is that Policy EIT-EN-P10 is a legacy provision which has been brought forward from the Partially Operative Regional Policy Statement 2019. While I support the inclusion of a provision that includes those matters (as is consistent with my primary evidence) it could be improved by combining it with the reverse sensitivity provisions applicable to regionally significant infrastructure in EIT-INF-P15 so that there is a single provision which seeks to recognise and provide for the effects on electricity distribution infrastructure. In my view this amendment would provide for those matters

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<sup>4</sup> Provisions amended to be specific to electricity infrastructure: EIT-INF-O4; EIT-INF-P15, EIT-INF-P17 and EIT-INF-AER7.

addressed in policy EIT-INF-P15 and EIT-EN-P10 for electricity sub-transmission and distribution (including those parts which qualify as significant electricity distribution infrastructure), whilst also recognising and providing for the different 'significance' classifications that apply to the electricity distribution network.

- 2.6 In her evidence in chief, Ms McLeod has sought additional provisions to provide recognition for the National Grid. Should these provisions find support, then I do not see any reason (from a planning perspective) why they not could also be inserted into the Energy Chapter.
- 2.7 For clarity, the additional provisions that I support for inclusion in the Energy Chapter are new versions of the EIT-INF and EIT-EN provisions, which are amended to be specific to the electricity network infrastructure. I am not recommending that these provisions are deleted from the EIT-INF chapter of the PORPS, as these provisions are required provide for other infrastructure activities, such as roading, airports and telecommunications.

### **3. Other Matters**

- 3.1 Ms McLeod has described the provisions that she supports in her evidence in chief on behalf of Transpower New Zealand Limited. I have considered the amendments sought by Ms McLeod for Policy EIT-INF-P16 and consider that these amendments also address the terminology consistency that I have sought be rectified in this policy in my evidence in chief.

Megan Justice

14 December 2022

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p><b>Proposed new note at beginning of chapter:</b></p> <p>Note: The provisions contained in EIT-EN apply to all energy activities and electricity generation activities, and the provisions contained in EIT-INF do not apply to those activities.</p>	<p>Manawa (00311.29) submission.</p> <p>Contact further submission point (FS00318.116)</p> <p>Meridian further submission point (FS00306.073)</p> <p>[and consequential amendments]</p>
<p><b>Objectives</b></p>	
<p><b>EIT-EN-O1 Energy and well-being</b></p> <p>Renewable electricity generation activities enable people and communities to provide for their environmental, social and cultural well-being, their health and safety, and support sustainable economic growth and development.</p>	<p>Meridian submission (00306.051)</p> <p>Contact submission (00318.023)</p> <p>Manawa submission (00311.030), further submission from Contact (FS00318.121)</p> <p>[and consequential amendments]</p>
<p><b>EIT-INF-O4 Provision of National Grid, electricity sub-transmission and distribution Infrastructure</b></p> <p>Effective, efficient and resilient National Grid, electricity sub-transmission and distribution infrastructure, including nationally significant infrastructure and regionally significant infrastructure, enables the people and communities of Otago to provide for their social and cultural well-being, their health and safety, and supports sustainable economic development and growth in the region.</p>	<p>Insert version of EIT-INF-O4 from evidence in chief of M Justice, and amend to be specific to electricity transmission and distribution activities.</p> <p>Aurora submission (0315.043)</p> <p>PowerNet submission (0511.023)</p> <p>Network Waitaki submission (0320.023)</p>
<p><b>EIT-EN-O2 – Existing renewable electricity generation is protected</b></p> <p>Existing renewable electricity generation capacity is protected, and where appropriate enhanced.</p>	<p>Contact submission (00318.024)</p> <p>Meridian further submission (FS00306.076)</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p><b>EIT-EN-03 Renewable electricity generation contributes to national targets</b></p> <p>Renewable electricity generation activities in Otago contribute to the achievement of New Zealand's national target for renewable electricity generation and climate change commitments, including supporting the reduction of national greenhouse gas emissions.</p>	<p>Manawa submission (00311.031) and Meridian further submission (FS00306.076)</p> <p>Contact submission (00318.024)</p> <p>Meridian submission (00306.052)</p> <p>[and consequential amendments]</p>
<p><b>EIT-EN-04 Energy use</b></p> <p>Development is located and designed to facilitate the efficient use of energy and to reduce demand if possible, minimising the contribution that Otago makes to total greenhouse gas emissions.</p>	<p>As per PORPS version subsequent to supplementary evidence.</p>
<p><b>EIT-INF-06 – Long-term planning for the National Grid, electricity sub-transmission and distribution</b></p> <p>Long term investment in, and planning for, the National Grid, electricity sub-transmission and distribution infrastructure and its integration with land use, is sustained.</p>	<p>Insert version of EIT-INF-06 as per PORPS version subsequent to supplementary evidence and amend to be specific to electricity transmission and distribution activities.</p>
<p><b>Policies</b></p>	
<p><b>EIT-EN-P1 Recognising and providing for renewable electricity generation</b></p> <p>Ensure that decisions on the allocation and use of natural and physical resources, including the use of fresh water and development of land:</p> <p>(1) recognise and provide for:</p> <ul style="list-style-type: none"> <li>a) the national significance of renewable electricity generation activities; and</li> <li>b) the national, regional and local benefits of renewable electricity generation activities,</li> </ul> <p>(2) have particular regard to:</p> <ul style="list-style-type: none"> <li>a) the importance of maintaining the generation output of existing renewable electricity generation activities and the continued availability of the renewable energy resource for existing activities, and</li> </ul>	<p>Manawa submission (00311.034)</p> <p>Meridian submission (00306.054)</p> <p>Contact submission (00318.026)</p> <p>Manawa submission on policy order (00311.032)</p> <p>[and consequential amendments]</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p>b) the functional needs and operational needs of existing and new renewable electricity generation activities,</p> <p>(3) recognise that the attainment of increases in renewable electricity generation capacity will require significant development of renewable electricity generation activities.</p>	
<p><b>EIT-EN-P2 Operation, maintenance, refurbishment and minor upgrading of existing facilities</b></p> <p>Protect and enable the operation, maintenance, refurbishment and minor upgrading of existing renewable electricity generation activities.</p> <p><b>Insert new definition of ‘minor upgrading’:</b></p> <p>Development to bring existing structures or facilities up to current standards or to improve the functional characteristics of structures or facilities, provided the upgrading itself does not give rise to any significant adverse effects on the environment and provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity. In relation to renewable electricity generation activities, includes increasing the generation or transmission capacity, efficiency or security of regionally significant infrastructure and replacing support structures within the footprint of authorised activities.</p>	<p>Manawa submission (00311.033)</p> <p>Meridian submission (00306.053)</p> <p>Contact submission (00318.025)</p> <p>Manawa submission on policy order (00311.032)</p> <p>[and consequential amendments]</p>
<p><b>EIT-EN-P3 Identifying new sites or resources</b></p> <p>Provide for activities associated with the investigation, identification and assessment of potential sites for new renewable electricity generation and of new and diverse sustainable energy sources.</p>	<p>Manawa submission (00311.036)</p> <p>Meridian submission (00306.056)</p> <p>Contact submission (00318.028)</p> <p>[and consequential amendments]</p>
<p><b>EIT-EN-P4 Development and upgrade of renewable electricity generation</b></p> <p>Provide for upgrades to existing renewable electricity generation activities and the development of new renewable electricity generation activities.</p>	<p>Manawa submission (00311.035)</p> <p>Meridian submission (00306.055)</p> <p>Contact submission (00318.027)</p> <p>[and consequential amendments]</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
Placeholder – insert EIT-INF- P16 Providing for the National Grid	Insert version of Policy EIT-INF-P16 from evidence in chief of A J McLeod on behalf of Transpower.
<p><b>EIT-INF-P15 Providing for electricity sub-transmission infrastructure, significant electricity distribution infrastructure and electricity distribution infrastructure</b></p> <ol style="list-style-type: none"> <li>1. Protect the efficient and effective operation of electricity sub-transmission infrastructure and significant electricity distribution infrastructure by: <ol style="list-style-type: none"> <li>a. Avoiding activities that may give rise to an adverse effect on the functional needs or operational needs of that infrastructure,</li> <li>b. Avoiding activities that may result in reverse sensitivity effects on that infrastructure, and</li> <li>c. Avoiding activities and development that foreclose an opportunity to adapt, upgrade or develop that infrastructure to meet future demands.</li> <li>d. Identifying significant electricity distribution infrastructure and managing effects of potentially incompatible activities through methods such as corridors.</li> </ol> </li> <li>2. Recognise and provide for electricity distribution infrastructure that is not electricity sub-transmission infrastructure or significant electricity distribution infrastructure, by: <ol style="list-style-type: none"> <li>a. Recognising the functional needs of electricity distribution infrastructure,</li> <li>b. Restricting the establishment of activities that may result in reverse sensitivity effects on that infrastructure,</li> <li>c. Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure, and</li> <li>d. Avoiding, remedying or mitigating adverse effects of new and upgraded electricity distribution infrastructure on existing land uses.</li> </ol> </li> </ol>	<p>Insert version of EIT-INF-P15 with amendments to incorporate EIT-EN-P10 (as recommended in the Supplementary Evidence of M Langman.</p> <p>Aurora submission (0315.053 and 0315.054) [and consequential amendments]</p>
<p><b>EIT-EN-P5 Managing effects</b></p> <p>When providing for new or upgraded renewable electricity generation activities:</p> <p>(1) Avoid, where practicable, locating such activities in the following areas:</p> <ol style="list-style-type: none"> <li>a) Scheduled wāhi tupuna, and areas with protected customary rights,</li> </ol>	<p>Manawa submission (00311.037)</p> <p>Meridian submission (00306.057)</p> <p>Contact submission (00318.029)</p>



Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<ul style="list-style-type: none"> <li>b) Scheduled significant natural areas,</li> <li>c) Natural wetlands,</li> <li>d) Scheduled outstanding natural features and outstanding natural landscapes,</li> <li>e) Scheduled outstanding water bodies,</li> <li>f) Scheduled areas of outstanding natural character,</li> <li>g) Scheduled areas or places of historic heritage value,</li> </ul> <p>(2) Where it is not practicable to avoid locating in the areas listed in (1) above, because of the functional needs or operational needs of renewable electricity generation activities, manage adverse effects as follows:</p> <ul style="list-style-type: none"> <li>(a) In wāhi tupuna, in accordance with HCV-WT-P2,</li> <li>(b) In a scheduled significant natural area, where more than minor residual adverse effects on biodiversity cannot be practicably avoided, remedied or mitigated, offsetting and/biodiversity compensation must be considered in accordance with APP3 and/or APP4,</li> <li>(c) In natural wetlands, in accordance with the NESF,</li> <li>(d) In all other areas listed in (1) above, manage the adverse effects of the renewable electricity generation activities on the values that contribute to the area's importance by: <ul style="list-style-type: none"> <li>i. Avoiding adverse effects, where practicable,</li> <li>ii. Where adverse effects cannot be practicably avoided, they are remedied or mitigated to the extent practicable,</li> <li>iii. Where they cannot be practicably remedied or mitigated regard shall be had to offsetting and/or compensation of more than minor residual adverse effects.</li> </ul> </li> </ul> <p>(3) In areas outside (1), avoid, remedy or mitigate significant adverse effects and when considering any residual adverse effects have regard to offsetting measures and compensation.</p>	<p>[and consequential amendments]</p>
<p><b>EIT-EN-P5A Managing the effects of renewable electricity generation activities within the coastal environment</b></p> <p>When managing the effects of renewable electricity generation activities within the coastal environment the provisions of the CE – Coastal environment chapter apply.</p>	<p>Consequential amendment to reflect other submissions and s42A / supplementary evidence.</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p><b>EIT-EN-PXX – Locating and managing effects of electricity distribution network infrastructure outside the coastal environment</b></p> <p>When providing for new electricity distribution infrastructure:</p> <p>(1) avoid, as the first priority, locating in all of the following:</p> <ul style="list-style-type: none"> <li>(a) significant natural areas,</li> <li>(b) outstanding natural features and outstanding natural landscapes,</li> <li>(c) natural wetlands,</li> <li>(d) outstanding water bodies,</li> <li>(f) areas or places of significant or outstanding historic heritage, and</li> <li>(g) wāhi tūpuna, and areas with protected customary rights.</li> </ul> <p>(2) if it is not demonstrably practicable to avoid locating in the areas listed in (1) above because of the functional needs or operational needs of the infrastructure, manage adverse effects as follows:</p> <p>(a) for electricity sub-transmission infrastructure and significant electricity distribution infrastructure:</p> <ul style="list-style-type: none"> <li>(ii) in natural wetlands, in accordance with the relevant provisions in the NESF,</li> <li>(iv) in other areas listed in (1) above, manage the adverse effects of the infrastructure on the values that contribute to the area's importance, by: <ul style="list-style-type: none"> <li>i. Avoiding adverse effects, where practicable;</li> <li>ii. Where adverse effects cannot be practicably avoided, they are remedied to the extent practicable;</li> <li>iii. Where adverse effects cannot be practicably remedied, they are mitigated to the extent practicable;</li> <li>iv. In Significant Natural Areas, where more than minor adverse effects cannot be practicably avoided, minimised, remedied or mitigated consider offsetting and/or compensation of any residual adverse effects on indigenous biodiversity values in accordance with APP3 and/or APP4.</li> </ul> </li> </ul> <p>(b) for all electricity distribution infrastructure that is not electricity sub-transmission infrastructure and significant electricity distribution infrastructure, where located within the areas listed in (1) above:</p> <ul style="list-style-type: none"> <li>(i) avoid significant adverse effects and avoid remedy or mitigate all other adverse effects on the values that contribute to the area's outstanding nature or significance, where practicable; and</li> </ul>	<p>Insert version of Policy EIT-INF-PXX from evidence in chief of M Justice.</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p>(ii) when considering any residual adverse effects on indigenous biodiversity values have regard to offsetting measures and compensation.</p> <p>(3) in other areas outside the areas listed in (1) above, avoid, remedy or mitigate adverse effects and when considering any residual adverse effects on indigenous biodiversity values consider offsetting measures and compensation.</p> <p>(4) in the event of any conflict between EIT-EN-PXX and other policies in this regional policy statement, EIT-EN-PXX prevails over those policies.</p>	
<p><b>EIT-EN-PXXA – Managing effects of electricity distribution infrastructure within the coastal environment</b></p> <p>When providing for new electricity distribution infrastructure and the upgrading and maintenance of existing infrastructure within the coastal environment manage adverse effects of infrastructure, by:</p> <p>(1) Giving preference to avoiding its location in all of the following within the coastal environment:</p> <ul style="list-style-type: none"> <li>i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna;</li> <li>ii. Outstanding natural character;</li> <li>iii. Outstanding natural features and outstanding natural landscapes, including seascapes;</li> </ul> <p>(2) Where it is not practicable to avoid locating in the areas listed in (1) above because of the functional needs of that infrastructure:</p> <ul style="list-style-type: none"> <li>i. Avoid adverse effects on the values that contribute to the significant or outstanding nature of (1) i-iii;</li> <li>ii. Avoid significant adverse effects on natural character and natural landscapes in all other areas of the coastal environment.</li> </ul> <p>(3) In the event of any conflict between EIT-EN-PXXA and other policies in this regional policy statement, EIT-EN-PXXA prevails over those policies.</p>	<p>Insert version of Policy EIT-INF-PXXA from evidence in chief of M Justice.</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p><b>EIT-EN-P6 Reverse sensitivity</b></p> <p>Activities that will result in reverse sensitivity effects on existing or consented renewable electricity generation activities are avoided, and only if that is not practicable, are minimised.</p> <p><b>Insert new definition for ‘minimise’ as “means to reduce to the smallest amount practicable.”</b></p>	<p>Manawa submission (00311.038)</p> <p>Meridian submission (00306.058)</p> <p>Contact submission (00318.030)</p> <p>[and consequential amendments]</p>
<p><b>EIT-EN-PXXX</b></p> <p>Encourage and support the development or upgrade of electricity distribution infrastructure necessary to mitigate risks of natural hazards including the adverse effects of climate change.</p>	<p>Insert new policy EIT-EN-PXXX from evidence in chief of M Justice. Amend to be specific to electricity transmission and distribution activities.</p>
<p><b>EIT-EN-P7 Small and community scale distributed electricity generation</b></p> <p>Provide for small and community scale distributed electricity generation activities that increase the local community’s resilience and security of electricity supply, including by providing for connections to the distribution network.</p>	<p>As per PORPS version subsequent to supplementary evidence.</p> <p>Amend as per the amendment sought to EIT-EN-P8 in the evidence in chief of M Justice.</p> <p>Aurora submission (00315.042)</p>
<p><b>EIT-INF-P17 Urban Growth and electricity transmission, sub-transmission and distribution infrastructure</b></p> <p>Provide for development <b>electricity transmission, sub-transmission and distribution</b> infrastructure required to service existing, planned and expected urban growth demands in the short, medium and long term, taking in account UFD – P1 to UFD – P10.</p>	<p>Insert version of EIT-INF-P17 as per PORPS version subsequent to supplementary evidence.</p> <p>Amend to be specific to electricity transmission and distribution activities.</p>
<p><b>EIT-EN-P8 Non-renewable electricity generation</b></p> <p>Avoid the development of non-renewable electricity generation activities in Otago and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.</p>	<p>As per PORPS version subsequent to supplementary evidence.</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p><b>EIT-EN-P9 Energy conservation and efficiency</b></p> <p>Development supports energy conservation and efficiency by:</p> <ol style="list-style-type: none"> <li>(1) requiring the development of new housing that is durably constructed and energy efficient,</li> <li>(2) designing subdivisions to maximise solar access, and</li> <li>(3) locating development to minimise, as far as practicable, transportation costs, car dependency and greenhouse gas emissions.</li> </ol>	<p>As per PORPS version subsequent to supplementary evidence.</p>
<p><b>Methods</b></p>	
<p><b>EIT-EN-M1 – Regional plans</b></p> <p>Otago Regional Council must prepare or amend and maintain its regional plans to:</p> <ol style="list-style-type: none"> <li>(1) protect and enable the ongoing operation, maintenance and minor upgrading (including identifying activities that qualify as minor upgrades) of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity, <b>and the electricity transmission, sub-transmission and distribution networks,</b></li> <li>(2) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation,</li> <li>(3) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of new renewable electricity generation activities,</li> <li>(4) manage the potential effects of new or upgraded renewable electricity generation activities,</li> <li>(5) 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.</li> </ol>	<p>Meridian submission (00306.061)</p> <p>Manawa submission (00311.040)</p> <p>[and consequential amendments]</p> <p><b>Aurora submission (00315.057) [and consequential amendments]</b></p>
<p><b>EIT-EN-M2 – District plans</b></p>	<p>Meridian submission (00306.062)</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p>Territorial authorities must prepare or amend and maintain their district plans to:</p> <ul style="list-style-type: none"> <li>(1) protect and enable the ongoing operation, maintenance and minor upgrading (including identifying activities that qualify as minor upgrades) of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity,</li> <li>(2) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation,</li> <li>(3) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of new renewable electricity generation activities,</li> <li>(4) manage the potential effects of new or upgraded renewable electricity generation activities,</li> <li>(5) 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,</li> <li>(5A) enable planning for the National Grid,</li> <li>(5B) map the National Grid, and identify a buffer corridor within which sensitive activities shall generally not be allowed,</li> <li>(5C) map electricity sub-transmission infrastructure and significant electricity distribution infrastructure and, where necessary, providing controls on activities to ensure that the functional needs of the significant electricity distribution infrastructure are not compromised,</li> <li>(5D) where necessary, establishing controls for buildings, structures and other activities adjacent to electricity infrastructure, to ensure the functional needs of that infrastructure are not compromised based on NZECP34:2001 Electrical Code of Practice for Electrical Safe Distances and the Electricity (Hazards from Trees) Regulations 2003 (prepared under the Electricity Act 1992),</li> </ul>	<p>Manawa submission (00311.041) [and consequential amendments]</p> <p>Aurora submission (0315.058)</p> <p>PowerNet submission (00511.026)</p> <p>Network Waitaki submission (00320.026)</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p>(6) require the design of subdivision development to optimise solar gain, including through roading, lot size, dimensions, layout and orientation, and</p> <p>(7) require the design of transport infrastructure to provide for multi-modal transport options in urban and rural lifestyle areas.</p>	
<p><b>EIT-EN-M3 – Education and information</b></p> <p>(1) Local authorities must provide education and information to improve energy efficiency and provide for the adoption of renewable energy sources, including:</p> <ul style="list-style-type: none"> <li>(a) ways to increase energy efficiency and energy conservation, and</li> <li>(b) opportunities for small and community scale distributed electricity generation.</li> </ul> <p>(2) Territorial authorities must provide information on design techniques to optimise solar gain, including through roading, lot size, dimensions, layout, and orientation.</p>	<p>As per PORPS version subsequent to supplementary evidence.</p>
<p><b>Explanation</b></p>	
<p><b>EIT-EN-E1 – Explanation</b></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 and the decarbonisation of the economy.</p> <p>Renewable electricity generation is a matter of national importance and a key component in responding to climate change and energy demands. Increasing renewable electricity security will assist with ensuring that communities have options for clean heat and electricity for health and wellbeing services.</p> <p>Renewable electricity generation activities are enabled by providing for the investigation, operation, maintenance, upgrading and development of existing and new assets and ensuring that decisions on allocating natural resources and</p>	<p>Meridian submission (00306.063)</p> <p>Manawa submission (00311.042)</p> <p>[and consequential amendments]</p> <p><b>Aurora submission (00315) [and consequential amendments]</b></p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p>the use of land, for example, recognise the benefits of renewable electricity generation activities arising from maintaining or increasing generation capacity.</p> <p>The functional needs and operational needs associated with renewable electricity generation activities are to be recognised, and the extent to which unavoidable adverse effects can be remedied or mitigated is a key consideration. Where residual adverse effects remain, consideration is to be given to proposals to offset these or compensate for them.</p> <p>To ensure the on-going functionality of renewable electricity generation assets and to maximise their benefits, reverse sensitivity effects or activities that may compromise renewable electricity generation activities are to be avoided or only if that is not reasonably practicable their impacts minimised.</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> <p>The policies in this section also recognise the critical importance of electricity transmission and distribution infrastructure to communities and provide for the continued operation of this existing infrastructure and the development of upgraded or new infrastructure where adverse effects are managed. As many assets rely on particular resource requirements or specific locations, decisions on allocating natural and physical resources shall make provision for the functional needs or operational needs of this infrastructure.</p> <p>To ensure electricity transmission and distribution infrastructure is planned for, and used efficiently, the provisions require that the benefits of existing nationally significant infrastructure, regionally significant infrastructure and significant electricity distribution infrastructure are maximised, and infrastructure provision is undertaken in a co-ordinated manner. The policies also seek to manage the potential adverse effects of other activities on nationally significant infrastructure, regionally significant infrastructure and significant electricity distribution infrastructure to ensure the ability to operate these assets is not compromised.</p>	
<b>Principal reasons</b>	
<b>EIT-EN-PR1 – Principal reasons</b>	Manawa submission (00311.044)



Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
<p>Electricity 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 electricity supply is disrupted. Therefore, ensuring the security of renewable electricity resources to meet demand and the supply of electricity to the community, is crucial. The ability of existing 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.</p> <p>Otago is fortunate to have several existing renewable electricity generation sites and the potential to increase renewable electricity generation. The benefits of renewable electricity generation include reducing greenhouse gas emissions, reducing dependence on imported energy and increasing supply security. These benefits are afforded to both Otago communities and nationally as exported electricity is significant for other regions. Because of this, protecting existing resources and providing for new renewable electricity generation opportunities to meet increasing electricity demand is necessary. Additionally, addressing inefficiencies in energy use can ensure that existing infrastructure is better utilised to reduce the need for new generation sites.</p> <p>Renewable electricity generation facilities, and the electricity transmission, sub-transmission and distribution networks, may cause adverse effects on the environment because of their functional need or operational 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. In some situations, it may not be possible to avoid, remedy or mitigate all significant adverse effects and consideration should be given to whether those residual effects are offset or compensated.</p> <p>The provisions in this chapter assist in giving effect to the NPSREG and NPSFM and implementing sections 5 and 7(j) of the RMA. Implementation of the provisions will occur primarily through regional plans and district plan provisions but regional, city and district councils also have a role in providing education and information to the community.</p> <p>In relation to the National Grid, sub-transmission and significant electricity distribution infrastructure (which are both a subset of infrastructure), specific provision is made which recognises some of the operational and functional constraints</p>	<p>[and consequential amendments]</p> <p>Aurora submission (00315) [and consequential amendments].</p>

Recommended New Provisions / Text with the EDBs provisions inserted, in RED	Scope
for electricity transmission and distribution. Matters that are required to be given effect to by the NPSET are addressed in respect of the National Grid to which the NPSET applies.	
<b>Anticipated environmental results</b>	
<b>EIT-EN-AER1</b> The proportion of electricity generated by renewable electricity generation activities (including small and community scale distributed electricity generation) in Otago increases over time.	As per PORPS version subsequent to supplementary evidence.
<b>EIT-EN-AER2</b> Energy use in Otago becomes more efficient over time and security of supply is maintained.	As per PORPS version subsequent to supplementary evidence.
<b>EIT-EN-AER3</b> The adverse effects associated with renewable electricity generation activities are avoided, remedied or mitigated, or where appropriate, offset or compensated for, and the adverse effects associated with the electricity transmission, sub-transmission and distribution networks are avoided, remedied or mitigated.	Manawa submission (00311.045), further submission from Meridian (FS00306.094) [and consequential amendments] Aurora submission (00315) [and consequential amendments]
<b>EIT-INF-AER7</b> Renewable energy generation activities, the National Grid, electricity sub-transmission infrastructure and significant electricity distribution infrastructure are protected from reverse sensitivity effects caused by incompatible activities.	Insert version of EIT-INF-AER7 as per PORPS version subsequent to supplementary evidence and amend to be specific to electricity transmission and distribution activities. Aurora submission (00315) [and consequential amendments]
<b>EIT-EN-AER4</b> The proportion of greenhouse gas emissions per capita from electricity generation reduces over time.	As per PORPS version subsequent to supplementary evidence.

