

**From:** Alice Lin  
**Sent:** Mon, 21 Nov 2022 21:02:44 +0000  
**To:** District Plan  
**Cc:** Alice Barnett  
**Subject:** Plan Change 22 - submission from Genesis Energy Ltd  
**Attachments:** 221122 MDP PC22 Genesis Submission.pdf

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Hello

Please find attached, submission from Genesis Energy Ltd on proposed Plan Change 22 (Lighting) to the Mackenzie District Plan.

We would appreciate if an acknowledgement reply could be provided please to confirm receipt. Many thanks.

Kind regards



**Alice Lin** | Environmental Policy and Planning Advisor  
Genesis Energy Ltd  
M. 021 0221 1943



Submission by Genesis Energy Limited

Trading as Genesis

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ON

Mackenzie District Plan Review – Stage 2  
Proposed Plan Change 22 (Light Chapter)

22 November 2022

# Submission by Genesis Energy Limited

Trading as Genesis

ON

## Mackenzie District Plan Review – Stage 2 Proposed Plan Change 22 (Light Chapter)

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To: Mackenzie District Council  
53 Main Street  
Fairlie 7925

Date: 22 November 2022

Name: Genesis Energy Limited

Contact: Alice Barnett  
Environmental Policy and Planning Manager  
Genesis Energy Limited  
Level 6, 155 Fanshawe Street  
PO Box 90477  
Victoria Street West  
Auckland 1142

Phone: 021 799 233

E-mail: [Alice.Barnett@genesisenergy.co.nz](mailto:Alice.Barnett@genesisenergy.co.nz)

Address for Service: As above

## 1. Introduction

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Genesis Energy Limited (**Genesis**) welcomes the opportunity to submit on Proposed Plan Change 22 (**PC22**) relating to the Light Chapter in the Mackenzie District Plan.

Genesis is an electricity generator and energy retailer with a diverse portfolio of renewable and thermal electricity generation assets. The generation profile of Genesis comprises a range of energy sources including hydro, thermal and wind across New Zealand.

In the Mackenzie district, Genesis owns and operates the Tekapo Power Scheme (**TekPS**, the **scheme**), which is a part of the nationally significant Waitaki Power Scheme.

In addition to its existing generation assets, Genesis is continuously reviewing opportunities for future development of renewable energy. It is in the context of providing for both the existing and potential new generation opportunities that Genesis makes this submission on PC22.

**Section 2** of the submission outlines Genesis' specific submission points and relief sought.

Genesis wishes to be heard in support of this submission. If others make a similar submission, Genesis would be prepared to consider presenting a joint case with them at any hearing.

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

We invite the Mackenzie District Council (**Council**) to consider our submission to ensure the activities fundamental to the continued operation, maintenance and upgrade of the nationally significant Tekapo Power Scheme (and more broadly the Waitaki Power Scheme) are not compromised.

Nāku noa, nā



Alice Barnett  
**Environmental Policy and Planning Manager**

## 2. Submission and Relief Sought

Genesis has previously provided initial feedback to the Council on the proposed light chapter.

As noted, the TekPS is fully located within the Aoraki Mackenzie International Dark Sky Reserve. Genesis has existing procedures in place to minimise light emissions from the Scheme. Genesis’ focus on the new lighting provisions relate to the following:

- Operational requirements – including the need for the power stations to operate 24-hours a day where existing large windows on the power station buildings may result in light spillage from an internal light source, and exterior lighting across the asset for operational safety, security and maintenance purposes.
- Project requirements – where additional external light sources may be required in circumstances such as project or outage work that require night-time work on a limited basis.

With consideration to the above, Genesis’ specific submissions are outlined in the table below.

Provision	Support / Oppose	Comments and relief sought (Additions <u>red underlined</u> / deletions <del>struck through</del> )
Objective LIGHT-O1	Support	Retain current objective wording. Genesis supports the proposed objective which provides for outdoor lighting to occur beyond daylight hours to provide for safety and security for activities. As stated above, Genesis has operational and project requirements for external lighting for safety and security reasons, which are provided for by the objective.
Rule LIGHT-R1	Support	Retain current rule wording. Genesis supports Rule LIGHT-R1 as currently worded as it provides for the use of exterior lighting required for emergency or project purposes.
Rule LIGHT-R2	Support	Retain current rule wording. Genesis supports a rule that permits the installation of security lights as a permitted activity subject to a motion sensor.
Rule LIGHT-R3	Support in part	Retain current rule wording and introduce a definition for “skylight”. Genesis understands Rule LIGHT-R3 seeks to prevent light spill from skylights affixed to the roof of buildings. Genesis notes “skylight” is not defined in PC22 and would prefer a definition be included to clearly reflect that the rule is not intended to capture large windows on walls, such as the existing large windows at the TekPS.
Standards LIGHT-S1 to LIGHT-S5	Support	Retain current standards wording.  Genesis has checked the proposed standards and is satisfied that it is able to retrofit existing external lighting in due course to ensure compliance with all standards.