

**FURTHER SUBMISSION TO SUBMISSIONS ON THE PUBLICLY NOTIFIED PROPOSED NATIONAL POLICY STATEMENT
FOR RENEWABLE ELECTRICITY GENERATION**

To: Board of Inquiry – NPS for Renewable Electricity Generation
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Meridian would like to be heard in support of its further submissions.

If other persons make a similar submission then Meridian would consider presenting joint evidence at the time of the hearing.

For and on behalf of Meridian Energy Limited



On behalf of Richard Turner, 19 December 2008

Submitters	Summary of Submission	Support or Oppose	Meridian's Reasons
<p>Waimakariri District Council (12), Taranaki Regional Council (15), Kensington Swan (25), ECan (31), Wanganui District Council (47), Federated Farmers (89), IPENZ Engineers New Zealand (92), Fish and Game New Zealand (112), Centre for Resource Management Studies (120)</p>	<p>NPS is unnecessary or inappropriate and should be withdrawn.</p>	<p>Oppose</p>	<p>Meridian considers a NPS necessary and appropriate, notwithstanding the suggested amendments to the NPS which it proposed in its original submission. There is a pressing need for clear and directive Central Government guidance as to renewable electricity projects. NPS are the only policy instruments that are capable of authoritatively directing decision makers on nationally significant issues, including as to competing considerations of national significance or importance under Part 2 of the Resource Management Act 1991 ('RMA'). The RMA gives significant potential for a NPS to be effective in influencing, and giving direction to, decision makers about the necessary value judgments which are required when considering applications under Part 2 of the RMA. Meridian considers that without appropriately directive national guidance, New Zealand will be at significant risk of failing to meet the challenges of climate change and ensuring the security of electricity supply..</p>
<p>Mainpower (19), Waikato District Council (28), Rangitata Diversion Race Management Ltd (35), Tasman District Council (71), CCC (103), Horizons Regional Council (105), Waipa District Council (107), LGNZ (109), Fish and Game New Zealand (112), Mark Rushworth (117). Ohariu Preservation Society (118).</p>	<p>NPS should provide clearer direction that adverse effects have to be managed.</p>	<p>Oppose</p>	<p>Meridian believes that sufficient guidance is provided in the RMA and planning documents about the adverse effects that have to be managed.</p> <p>The NPS and section 32 evaluation proceed on the premise that the main reason why renewable electricity generation projects are experiencing difficulty obtaining resource consent is that their national benefits are not recognised, or sufficiently recognised. This is one critical element of the NPS. It is also Meridian's experience that the potential adverse effects of renewable electricity generation developments are exhaustively canvassed in consent hearings and are not an issue that needs addressing in the NPS.</p>

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			Meridian also considers that the difficulty for resource consent decision-makers is generally not in identifying the national benefits (or effects), but in weighing those benefits against other factors protected in Part 2 of the RMA, in order to achieve the purpose of the RMA.
Pioneer Generation Ltd (22), King Country Energy Ltd (23), Rangitata Diversion Race Management Ltd (35), Hamilton City Council (61), Contact Energy Limited (64), TrustPower (94),	Add further policy recognising the benefits from <u>existing</u> generation and enhancements.	Support	Meridian agrees that the addition of a further policy recognising the benefits from existing renewable electricity generation is important. Existing renewable electricity facilities are nationally important assets and their continued use, and ensuring opportunities for more efficient use, are the critical baseline to achieving the 90% renewable electricity generation target. Meridian considers it crucial that the existing electricity generation output from renewable sources is not diminished if New Zealand is going to be able to achieve the challenging target of 90% renewable electricity generation by 2025
Rodney District Council (7)	Balance objective with "security of supply".	Oppose	The NPS sets out an objective and policies to enable the sustainable management of renewable electricity generation activities under the RMA. Meridian does not consider it necessary or appropriate for the NPS to seek to balance renewable electricity generation against alternative sources of electricity generation.
NZ Petroleum Exploration and Production Association (2), Linda Conning (21), Chris Henderson (24). Nelson/Tasman Branch of the Royal Forest and Bird Protection Society (34), Royal Forest & Bird Protection Society Inc (79), CCC (103)	"Bending the rules" for renewables / overly weighted to renewables / weakens the RMA approach.	Oppose	NPS are the intended means by which central government policy direction is given effect to in the RMA and is critical to achieving the RMA's sustainable management purpose. The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. Meridian considers that the NPS is consistent with the RMA and is mindful that it won't preclude the need to take into account other relevant Part 2 matters when decisions are made regarding renewable electricity projects, in accordance with the statutory

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			provisions of the RMA.
NZ Petroleum Exploration and Production Association (2), Genesis Energy (33),	NPS should state that it makes no judgement on non-renewables.	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities, such that 90 per cent of New Zealand's electricity will be generated from renewable sources by 2025. Meridian does not consider it appropriate or necessary for the NPS to make statements regarding non-renewable electricity sources either expressly or by inference.
South Waikato District Council (67)	Council should not be tasked with undertaking investigative research to identify potential sites and energy sources.	Oppose	Meridian considers that the submitter has misinterpreted what Policy 4 requires of local authorities. Policy 4 does not require that local authorities undertake these tasks, but merely introduce planning provisions to enable such activities to be undertaken by others.
Mighty River Power (73)	Need for greater consistency with the NPS and NES for Freshwater Management.	Support in part	Meridian supports the submission in so far as the NPS for Renewable Electricity Generation is further advanced than the NPS for Freshwater Management, and therefore the NPS for Freshwater Management should be aligned with the NPS for Renewable Electricity Generation.
RMLA (56), Transpower New Zealand Limited (111)	Need for greater consistency with Transmission NPS.	Support	Meridian supports the need for greater consistency with the NPS on Transmission, to the extent that it is consistent with Meridian's original submission, and that this would ensure better alignment between the policies of these two documents.
Fonterra (37), Federated Farmers (89),	Oppose NPS as it prioritises renewable generation above other competing water uses –	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. Meridian does not consider that it is inappropriate for

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	greatest net benefit for NZ assumed to be from renewable generation.		<p>the NPS to promote renewable electricity generation that utilise water resources. In addition, particular matters relating to the allocation of water between consumptive and non-consumptive uses in any specific catchment will be addressed via Regional Policy Statements and Regional Plans, as appropriate to the circumstances of the catchment, and consistent with the provisions of this NPS.</p> <p>If the submitters are asserting that a different use of water is preferable then that may be a matter for the NPS on Freshwater Management, following consideration of the range of relevant national priorities affecting those activities, including water quality and climate change impacts.</p>
Environment Bay of Plenty (82)	NPS does not address the issue of priority when there are competing uses for resources.	Support in part	It would be useful for the NPS to recognise the importance of renewable electricity generation in considering competing uses of natural resources. However, it is unclear whether the submitter is referring to priority between applications for resource consent or preference. Meridian submits that it is appropriate for the NPS to seek preference for the use of natural and physical resources for renewable electricity generation.
Otago Fish and Game Council (46), Helen Brosnan (63), Waitaki Protection Trust (68)	NPS should steer renewables away from hydro-electricity.	Oppose	Hydro-derived renewable electricity generation contributes significantly to New Zealand's existing electricity generation. These assets are of national importance. Notwithstanding this, the role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities, so that 90% of New Zealand's electricity will be generated from renewable sources by 2025. This target would not be achievable if the NPS 'steered away' from electricity generated by hydro sources. Furthermore, the definition of the renewable energy in the RMA specifically includes hydro generation.
Otago Fish and Game Council (46), Kaikoura	Address energy supply and	Oppose	The role of the NPS is to recognise the national significance of renewable

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District Council (66), Royal Forest & Bird Protection Society Inc. (79), Environment Bay of Plenty (82), Northland Regional Council (84), Wild Rivers Action Project (102), Fish and Game New Zealand (112), Mark Rushworth (117)	demand issues.		electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. It is not appropriate or necessary for the NPS to address electricity supply and demand as this can be achieved through other methods (i.e. EECA).
Waikato Raupatu Trustee Company Ltd (60),	Address energy supply and utilisation efficiency.	Oppose	Policy 2 is not concerned with considering electricity transmission issues, rather it is about recognising the practical and locational constraints associated with the development of new and existing and renewable generation activities. Meridian considers it is important to inform decision-makers about the real, practical circumstances associated with the development of electricity generation from renewable electricity resources, but does not consider it relevant to include electricity supply and utilisation efficiency issues.
Auckland Conservation Board (50),	Keep electricity generation away from various conservation areas.	Oppose	The NPS provides a framework for considering renewable electricity generation activities within the wider RMA context. As such, any proposal would be examined on a case-by-case basis. This ensures flexibility and informed decision-making. In addition, a separate concession process would be required if DoC land was directly involved in a renewable electricity proposal.
Genesis, (33), Unison Networks Limited (54), Contact Energy Limited (64)	New policy on reverse sensitivity effects should be included .	Support	Meridian considers that the proposed NPS is the appropriate policy instrument to provide guidance to decision-makers that, in developing policy statements and plans and in considering whether or not to grant consent to applications for a wide range of activities, they need to ensure that renewable electricity generation activities are not unreasonably compromised by third party activities and developments.
Hamilton City Council (61),	Require Regional Energy	Support in Part	Meridian supports this submission in part, insofar as it may assist some

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	Strategies.		local authorities with implementing their obligations under the NPS.
NZ Petroleum Exploration and Production Association (2)	Definition of "National Grid" too broad.	Oppose	Meridian considers the definition of "National Grid" contained in the NPS is appropriate.
NZ Petroleum Exploration and Production Association (2), Rodney District Council (7), Genesis Energy (33), Todd Energy (77)	Too much support for renewables, as opposed to other electricity generation.	Oppose	The NPS sets out an objective and policies to enable the sustainable management of renewable electricity generation activities under the RMA. Meridian considers that an effective NPS on renewable electricity generation is fundamentally important to the promotion of sustainable management under Part 2 of the Act. Given its purpose, Meridian does not consider it appropriate to include reference to other forms of electricity generation (i.e. non-renewable generation) in the NPS.
John Adams (3), Rosemary Adams (8)	Oppose large-scale wind farms.	Oppose	Meridian does not consider it appropriate for the NPS to oppose or promote renewable electricity generation activities based on scale. The NPS sets out a framework for enable the sustainable management of renewable electricity generation activities under the RMA and any proposal would need to be considered on a case-by-case basis taking all relevant Part 2 matters into account.
Julian Boorman (5), Taranaki Regional Council (15), Nelson Canoe Club (16), Linda Conning (21), Ngati Kahungunu Iwi Incorporated (27), ECan (31), Nelson/Tasman Branch of the Royal Forest and Bird Protection Society (34), Fonterra (37), Otago Fish and Game Council (46), Te Runanga o Ngai Tahu (48), Auckland Conservation Board (50), New Zealand Historic Places Trust (59), Helen Brosnan (63), Kaikoura District Council (66), Tasman District Council (71), Royal Forest & Bird	Section 6 / 7 matters should be given greater weight than renewables e.g. natural character, landscapes, recreation, heritage.	Oppose	The NPS sets out an objective and policies to enable the sustainable management of renewable electricity generation activities under the RMA. The matter addressed in the NPS will not preclude the need to take into account all other relevant Part 2 matters during decision-making on renewable electricity generation projects. Furthermore, these Section 6 and 7 matters are already provided for in regional and district planning instruments.

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<p>Protection Society Inc. (79), Sustainable Electricity Association New Zealand (83), Federated Farmers (89), Cardno TCB (98), Rotorua District Council (101), Wild Rivers Action Project (102), CCC (103), Hawke's Bay Regional Council (110), Fish and Game New Zealand (112), , Taranaki Whanganui Conservation Board (114), ARC (115), Mark Rushworth (117), Ohariu Preservation Society (118).</p>			
<p>North Shore City Council (9), New Zealand Law Society (10), Kapiti Coast District Council (11), RES New Zealand Ltd (14), Gisborne District Council (18), Mainpower (19), Kensington Swan (25), Waikato District Council (28), ECan (31), Wellington City Council (36), Fonterra (37), Palmerston North City Council (40), Wanganui District Council (47), New Zealand Wind Energy Association (52), Climate Defence Network (53), Hamilton City Council (61), Contact Energy Limited (64), Mighty River Power (73), West Coast Regional Council (85), CCC (103), Greater Wellington Regional Council (104), Waipa District Council (107), LGNZ (109), Transpower New Zealand Limited (111), ARC (115), Mark Rushworth (117), New Zealand Pork (119)</p>	<p>Does not provide clear policy guidance; does not go far enough with policy direction; does not deal with delays; does not provide guidance in balancing costs and benefits.</p>	<p>Support in part</p>	<p>Meridian supports the aspect of these submissions, which seek greater policy guidance and dealing with delays. The proposed NPS provides an opportunity to provide clear guidance to decision makers as to how to reconcile competing Part 2 considerations, when making decisions about renewable generation infrastructure. The NPS also must provide clear direction as to the ongoing utilisation of existing assets and the development of new renewable electricity generation.</p>
<p>Transpower (111)</p>	<p>Do not disadvantage renewables due to limitations on transmission.</p>	<p>Support</p>	<p>The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. It is not its role to address electricity supply and</p>

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			demand. Meridian agrees that the NPS should not be hindered by limitations arising from transmission assets.
IPENZ Engineers New Zealand (92)	Include a threshold below which no call-in would be applicable.	Oppose in part	Meridian believes that the need for call-in should be assessed on a case-by-case basis depending on the nature or scale of the application. However, the Board of Inquiry may consider guidance as to when call in is appropriate in the NPS.
Solar Action (80)	Include a cap to electricity generation.	Oppose	The relief proposed by the submitter is not appropriate or necessary in order to facilitate the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities.
IPENZ Engineers New Zealand (92)	Review NPS in 10 years.	Support	Meridian considers it important to include timeframes in the NPS to consider the effectiveness of the NPS and its provisions, via a formal review process.
New Zealand Law Society (10)	The NPS does not overcome the hurdles for renewable electricity generation that are inherent in the competing values articulated in Part 2, it is simply a matter to be considered	Support in part	Meridian agrees that the NPS provides an opportunity to give clear guidance to decision makers as to how to reconcile competing Part 2 considerations, when making decisions about renewable generation infrastructure. The NPS must provide clear direction as to the ongoing utilisation of existing and the development of new renewable electricity generation, or else the sustainable management purpose of the RMA may be jeopardised. The RMA accords relevant status to the NPS in plan and consent processes.
New Zealand Wind Energy Association (52),	The need for stronger guidance and support for renewable generation. Seeks new policy regarding consistent application of technical	Support in part	Meridian supports this submission insofar as greater guidance is required. The proposed NPS is the opportunity to provide clear guidance to decision makers as to how to reconcile competing Part 2 considerations, when making decisions about renewable electricity generation activities. The NPS must provide clear direction as to the ongoing utilisation of existing

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	standards for noise and electric magnetic radiation.		<p>and the development of new, renewable electricity generation, or else the sustainable management purpose of the RMA may be jeopardised.</p> <p>Meridian supports the development of consistent technical standards to be applied for noise and electric-magnetic radiation.</p>
<p>North Shore City Council (9), Northpower (26), ECan (31), Wellington City Council (36), Tasman District Council (71), Todd Energy (77), Northland Regional Council (84), Environment Waikato (96), Powerco (100), LGNZ (109)</p>	<p>Do not include 90% target in Objective, as may be changed. Puts undue weight on NZES. Emphasis should be on "demand" instead</p>	<p>Oppose</p>	<p>Renewable electricity generation is a key part of the New Zealand Energy Strategy ('NZES') for managing climate change, and long term electricity security. A target has been set that 90% of electricity is to be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year) except to the extent necessary to maintain security of supply. The key regulatory instrument and processes that will influence whether the target can be achieved is the RMA, as it determines both whether new renewable electricity proposals are consented, and the timeframes for doing so. Meridian therefore considers it appropriate to include this target in the NPS.</p> <p>The submitters consider that the emphasis in the Objective should be on "demand". Meridian considers that it is appropriate to recognise that the degree of growth in electricity demand cannot be forecast with certainty so that New Zealand's renewable generation capacity will need to be flexible in order to meet the 90% target under a range of future demand growth scenarios.</p>
<p>Kapiti Coast District Council (11), RES New Zealand Ltd (14), Gisborne District Council (18), Linda Conning (21), Pioneer Generation Ltd (22), King Country Energy Ltd (23), Rangitata Diversion Race Management Ltd (35), Windflow Technology Ltd (42), Auckland Conservation Board (50), RMLA</p>	<p>Supports zoning, designation, identification of areas for, or unsuitable for, renewables</p>	<p>Oppose</p>	<p>The proposed NPS does not adopt a zoning approach to renewable electricity development, whereby councils would identify zones for the development of renewable electricity projects through their planning instruments. Meridian believes that a zoning approach would be contrary to good RMA practice and the provision of necessary renewable electricity</p>

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(56), TrustPower (94), Mark Rushworth (117), Centre for Resource Management Studies (120)			generation.
Contact Energy Limited (64),	Opposed to zoning, designation, identification of areas for, or unsuitable for, renewables	Support	The proposed NPS does not adopt a zoning approach to renewable electricity development, whereby councils would identify zones for the development of renewable electricity projects through their planning instruments. Meridian supports the submitter's position, and submits that a zoning approach would be contrary to good RMA practice and the provision of necessary renewable electricity generation.
Ecologic (51), Hawke's Bay Regional Council (110), Fish and Game New Zealand (112)	Objective 1 should be better specified	Oppose	Meridian opposes these submissions insofar as they are not consistent with Meridian's original submission.
Marlborough District Council (72)	Objective 1 should be better specified – include sustainable management	Support in part	Meridian generally supports the approach taken in the proposed Objective to recognising the role of both existing and new renewable electricity generation activities in achieving the 2025 target. Meridian considers the Objective would be strengthened, and more focused on the main issue raised in the Preamble, if its primary point of national significance relates to the achievement of the renewable target, with the actions regarding existing and new renewable electricity generation being the manner by which the target is to be achieved.
New Zealand Wind Energy Association (52)	Objective 1 should be better specified – “at least” 90% or more.	Support in part	Meridian generally supports the approach taken in the proposed Objective. Meridian considers the Objective would be strengthened, and more focused on the main issues raised in the Preamble, if its primary point of national significance relates to the achievement of the renewable target, with the actions regarding existing and new renewable electricity generation being the manner by which the target is to be achieved.
Te Runanga o Ngai Tahu (48), Contact Energy Ltd (64)	Supportive of the intention of Objective 1.	Support in part	Meridian generally supports the approach taken in the proposed Objective to recognising the role of both existing and new renewable electricity

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			generation activities in achieving the 2025 target, subject to the amendments it seeks in its submission
Fish and Game New Zealand (112)	Include reversibility in Objective 1.	Oppose	Meridian does not support the inclusion of a concept of reversibility in Objective 1, or in any other part of the NPS. Meridian does not consider it relevant, when considering a resource consent application under the RMA, to consider whether or not the adverse environmental effects from one type of renewable electricity generation activity are reversible, or how they compare with an alternative generation technology. Instead, an overall consideration and judgement needs to be made regarding the adverse and beneficial environmental effects of any particular renewable electricity generation proposal, in terms of achieving the purpose of the RMA. A reversibility principle does not take account of practical contextual realities, as in fact environments change over time and it is often difficult, if not impossible, to completely 'reverse' effects and recreate an environment at some time in the future.
North Shore City Council (9), Kensington Swan (25), Porirua City Council (30), ECan (31), Tasman District Council (71), Environment Waikato (96), Rotorua District Council (101), CCC (103), Horizons Regional Council (105), LGNZ (109)	Confusion in NPS Objective 1 / Policy 1 as to the weight to be given to renewables under NPS compared with Part 2, S.6 matters – requires clarification.	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. It is not considered appropriate to include other Part 2 matters in an NPS which deals specifically with renewable electricity. In addition, those, other, relevant matters will be taken into account when decisions are made regarding renewable electricity projects, in accordance with the statutory provisions of the RMA.

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Rodney District Council (7), Pioneer Generation Ltd (22), King Country Energy Ltd (23), Rangitata Diversion Race Management Ltd (35), Windflow Technology Ltd (42), New Zealand Wind Energy Association (52), Unison Networks Limited (54), TrustPower (94), Manukau City Council (97), Wellington Regional Council (104), LGNZ (109)	Additional benefits should be included in Policy 1 – general.	Support in part	Meridian supports this submission insofar as it is consistent with Meridian's own submissions. Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from renewable electricity generation, as stated in Policy 1. Development that increases renewable electricity generation output can have adverse environmental effects that manifest locally, whilst presenting positive effects which manifest locally, regionally and nationally. It is appropriate that these benefits be recognised.
Vector Ltd (75), Todd Energy (77),	Remove “benefits” from Policy 1.	Oppose	Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from renewable electricity generation, as stated in Policy 1. Development that increases renewable electricity generation output can have adverse environmental effects that manifest locally, whilst presenting positive effects which manifest locally, regionally and nationally. It is appropriate that these benefits be recognised.
Rodney District Council (7). Wellington City Council (36)	Additional benefits should be included in Policy 1 – GHG, increased renewable generation, reduces costs, overseas price exposure, etc	Support in part	Meridian supports this submission insofar as it is consistent with Meridian's submissions. Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from renewable electricity generation, as stated in Policy 1. Development that increases renewable electricity generation output can have adverse environmental effects that manifest locally, whilst presenting positive effects which manifest locally, regionally and nationally. It is appropriate that these benefits be recognised.
Kapiti Coast District Council (11)	Additional benefits should be in Policy 1 – local air quality, overseas price exposure	Support in part	Meridian supports this submission insofar as it is consistent with Meridian's submissions. Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from renewable electricity generation, as stated in Policy 1.

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			Development that increases renewable electricity generation output can have adverse environmental effects that manifest locally, whilst presenting positive effects which manifest locally, regionally and nationally. It is appropriate that these benefits be recognised.
Greater Wellington Regional Council (104)	Limit the scope of policy 1 to 'national' benefits'.	Oppose	Meridian does not consider it appropriate to limit the scope of Policy 1 to 'national benefits'. Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from renewable electricity generation, as stated in Policy 1. Development that increases renewable electricity generation output can have adverse environmental effects that manifest locally, whilst presenting positive effects which manifest locally, regionally and nationally.
LGNZ (109)	Additional benefits should be included in Policy 1 (in relation to particular types of renewable sources)	Oppose	Meridian does not consider it necessary or appropriate to include specific benefits for different types of renewable electricity sources in Policy 1. Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from any form of renewable electricity generation.
Kapiti Coast District Council (11), ECan (31), Contact Energy Limited (64), Vector Ltd (75), Todd Energy (77), Environment Waikato (96), Greater Wellington Regional Council (104), Centre for Resource Management Studies (120)	Support for "at any scale" in Policy 1	Oppose in Part	<p>Meridian does not support the inclusion of the reference to "renewable electricity generation activities, at any scale" in Policy 1. While Meridian agrees that both large, utility scale generation and small community scale projects have a role in play in New Zealand's generation mix, the benefits of each scale of project vary, and this should be recognised.</p> <p>The 90% renewables by 2025 target is an important, but ambitious, target. That target will only be able to be achieved if significant development of large utility-scale renewable electricity generation activity occurs. The benefits of such large scale development are nationally significant, even when each generation project is considered individually.</p>

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			Those same national significance benefits do not arise when small scale development is examined on an individual basis, because of the electricity generation output they produce. However, when considered cumulatively, small scale development does have real benefits, which will also assist in meeting the renewables target.
Taranaki Regional Council (15), Hamilton City Council (61),	NPS / Policy 1 could mean renewables have priority over community water supply, recreation, etc.	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. Meridian does not agree that it is inappropriate for such an NPS to promote renewable electricity generation from water resources. In addition, particular matters relating to allocation of water between consumptive and non-consumptive uses in any specific catchment will be addressed via Regional Policy Statements and Regional Plans, as appropriate to the circumstances of the catchment, consistent with the provisions of this NPS. Further, the NPS does not preclude the need to take into account other relevant Part 2 matters during decision-making regarding water allocation preferences.
Kaikoura District Council (66), Federated Farmers (89), Powerco (100), ARC (115)	Include effects of, or on, transmission network in Policies 1 / Policy 2	Oppose	Policies 1 and 2 are not about considering effects of or on the transmission network, rather they seek to recognise the locational and practical matters associated with renewable generation development.
Powerco (100)	Additional constraints into Policy 2 - location of new electricity distribution assets	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities. It is not considered appropriate to provide for matters relating to the location of new electricity distribution assets.
Mainpower (19), Kensington Swan (25), Wanganui	Policy 2 could be clearer in	Support	Meridian supports these submissions insofar as they are consistent with

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District Council (47), New Zealand Wind Energy Association (52), Contact Energy Limited (64), Tasman District Council (71),	its intent to acknowledge that constraints can limit opportunity to avoid, remedy or mitigate adverse effects		the amendments sought in Meridians submission.
Kapiti Coast District Council (11), Gisborne District Council (18), Waikato District Council (28), Wanganui District Council (47), Te Runanga o Ngai Tahu (48), Auckland Conservation Board (50), New Zealand Historic Places Trust (59), Helen Brosnan (63), Royal Forest & Bird Protection Society Inc. (79), Federated Farmers (89), Rotorua District Council (101), CCC (103), Greater Wellington Regional Council (104), Waipa District Council (107), LGNZ (109), , Fish and Game New Zealand (112), ARC (115), Mark Rushworth (117), Ohariu Preservation Society (118).	Policy 2 – oppose need to have particular regard to technical, operational and physical constraints as supposed to managing effects	Oppose	<p>Meridian considers it is important to inform decision-makers about the real, practical constraints associated with the development of electricity generation from renewable electricity resources. Meridian considers it is important that such practical matters are considered as an integral part of deciding whether or not to grant consent to a renewable electricity generation activity, and not just when considering appropriate conditions.</p> <p>In addition, the NPS does not preclude the need to take into account other relevant Part 2 matters when decisions are made regarding renewable electricity projects, in accordance with the statutory provisions of the RMA.</p> <p>Meridian does not believe that it will be feasible to meet the 90% renewable electricity target without consenting some renewable electricity generation activities with more than minor adverse environmental effects, because it will just not be possible to find sufficient, practical proposals that avoid such effects in all instances. However, proposals with such effects can still be consistent with the RMA's sustainable management purpose. Accordingly, the practical limitations of electricity generating infrastructure and the difficulties of the generation activity itself need to be borne in mind as part of the overall judgment during consent decision-making.</p>
Wellington City Council (36), Auckland Regional Public Health Service (39), Fish and Game New Zealand (112),	Policy 2 should not be considered over and above Part 2 matters	Oppose	Meridian considers it is important to inform decision-makers about the real, practical constraints associated with the development of electricity generation from renewable electricity resources. Meridian considers it is important that such practical matters are considered as an integral part of

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			<p>deciding whether or not to grant consent to a renewable electricity generation activity, and not just when considering appropriate conditions.</p> <p>In addition, the NPS does not preclude (or express any limitation on) the need to take into account other relevant Part 2 matter when decisions are made regarding renewable electricity projects, in accordance with the statutory provisions of the RMA.</p>
West Coast Regional Council (85),	Delete Policy 2, not needed	Oppose	<p>Meridian considers it is important to inform decision-makers about the real, practical constraints associated with the development of electricity generation from renewable electricity resources.</p> <p>Meridian also considers it is important that such practical matters are considered as an integral part of deciding whether or not to grant consent to a renewable electricity generation activity, and not just when considering appropriate conditions. Meridian does not believe that it will be feasible to meet the 90% renewable electricity target without consenting some renewable electricity generation activities with more than minor adverse environmental effects, because it will just not be possible to find sufficient, practical proposals that avoid such effects in all instances. However, proposals with such effects can still be consistent with the RMA's sustainable management purpose. Accordingly, the practical limitations of electricity generating infrastructure and the difficulties of the generation activity itself need to be borne in mind as part of the overall judgment during consent decision-making.</p>
NZ Petroleum Exploration and Production Association (2), Julian Boorman (5), South Taranaki District Council (6), SPX Consultants (13), RES New Zealand Ltd (14), Nelson Canoe Club (16), Gisborne District Council (18),	Supports Policy 3 (partly or wholly)	Oppose	Meridian does not support the emphasis in proposed Policy 3 on the "reversibility" of adverse effects of different generation technologies. It is not relevant, when considering a consent application under the RMA, to consider whether or not the adverse environmental effects from one type of renewable electricity generation activity are reversible, when compared

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<p>Northpower (26), Waikato District Council (28), Porirua City Council (30), Wellington City Council (36), Fonterra (37), New Zealand Geothermal Association (41), Otago Fish and Game Council (46), Te Runanga o Ngai Tahu (48), Auckland Conservation Board (50), Ecologic (51), Unison Networks Limited (54), Otago Regional Council (58), Waikato Raupatu Trustee Company Ltd (60), Franklin District Council (65), Kaikoura District Council (66), Waitaki Protection Trust (68), Marlborough District Council (72), Royal Forest & Bird Protection Society Inc. (79), Solar Action (80), Sustainable Electricity Association New Zealand (83), Federated Farmers (89), Environment Waikato (96), Manukau City Council (97), Cardno TCB (98), Wild Rivers Action Project (102), LGNZ (109), Hawke's Bay Regional Council (110), Fish and Game New Zealand (112), Taranaki Whanganui Conservation Board (114), ARC (115)</p>			<p>with an alternative generation technology. A reversibility principle does not take account of practical contextual realities, as in fact environments change over time and it is often difficult, if not impossible, to completely 'reverse' effects and recreate an environment at some time in the future.</p> <p>Meridian also considers the submitters approach is inconsistent with the reality that important infrastructure development provides significant intergenerational benefits.</p>
<p>Rodney District Council (7), Kapiti Coast District Council (11), Mainpower (19), Pioneer Generation Ltd (22), King Country Energy Ltd (23), Environment Canterbury (31), Tauranga City Council (32), Genesis Energy (33), Rangitata Diversion Race Management Ltd (35), Geothermal Association (41), Bioenergy Association of New Zealand Inc (43), Major Electricity Users Group (45), Wanganui District Council (47), New Zealand Wind Energy Association (52), New Zealand Historic Places Trust (59), Contact Energy Limited</p>	<p>Delete Policy 3</p>	<p>Support, or support in part where alternatives are proposed.</p>	<p>Meridian agrees that Policy 3 should be deleted.</p> <p>Meridian does not support the emphasis in proposed Policy 3 on the "relative reversibility" of adverse effects of different generation technologies. It is not relevant, when considering a consent application under the RMA, to consider whether or not the adverse environmental effects from one type of renewable electricity generation activity are reversible, when compared with an alternative generation technology.</p>

Submitters	Summary of Submission	Support or Oppose	Meridian's Reasons
<p>(64), Tasman District Council (71), Mighty River Power (73), Todd Energy (77), West Coast Regional Council (85), IPENZ Engineers New Zealand (92), TrustPower (94), Whangarei District Council (99), Rotorua District Council (101), CCC (103), Greater Wellington Regional Council (104), Horizons Regional Council (105), Waipa District Council (107), Transpower New Zealand Limited (111), Centre for Resource Management Studies (120)</p>			
<p>New Zealand Law Society (10)</p>	<p>Subject matters of Policies 1 to 2 are already considered and provided for through decision of local authorities and the Environment Court....,in practice Policies 1 to 2 add little that is new or helpful to the deliberative process.</p>	<p>Oppose</p>	<p>Meridian generally supports the intention of Policy 1. Meridian considers that one of the principal roles of the NPS is to draw to the attention of decision-makers the national significance of the benefits from renewable electricity generation, as stated in Policy 1. Development that increases renewable electricity generation output can have adverse environmental effects that manifest locally, whilst presenting positive effects which manifest locally, regionally and nationally. It is appropriate that this is recognised. The NPS has an important role in ensuring a nationally consistent approach to balancing these competing values. Meridian also generally supports Policy 2. Meridian considers it is important to inform decision-makers about the real, practical constraints associated with the development of electricity generation from renewable electricity resources.</p>
<p>Environment Bay of Plenty (82), West Coast Regional Council (85),</p>	<p>Policy 4 – alternative wording suggested.</p>	<p>Support in part</p>	<p>Meridian generally supports Policy 4 but agrees with the submitter that the Policy could be better worded. Meridian does not consider the Policy, as worded, is sufficient in directing local authorities as to the changes that will need to be made to their policy statements and plans. In particular, proposed Policy 4 does not refer to the possibility of local authorities needing to introduce new rules into their plans, in order to give effect to the</p>

Submitters	Summary of Submission	Support or Oppose	Meridian's Reasons
			objectives and policies of this NPS.
RES New Zealand Ltd (14)	Delete Policy 5.	Oppose	Meridian broadly supports Policy 5. Meridian considers that the target of 90% of renewable electricity generation will only be able to be achieved through the development of a combination of a significant amount of large utility-scale and some smaller-scale renewable electricity generation activities, combined with other demand side management initiatives.
Waimakariri District Council (12), Taranaki Regional Council (15), Porirua City Council (30), Wellington City Council (36) Hamilton City Council (61), Helen Brosnan (63), Kaikoura District Council (66), Environment Bay of Plenty (82), West Coast Regional Council (85), New Plymouth District Council (91), IPENZ Engineers New Zealand (92), CCC (103), Greater Wellington Regional Council (104), Horizons Regional Council (105), LGNZ (109), Mark Rushworth (117)	Opposed to requiring Plan Changes in Policy 4/5 – as will not always be needed / is too costly / Councils should be able to decide whether a Plan Change is necessary.	Oppose	<p>Meridian opposes these submissions as it believes there is a pressing need for clear and directive Central Government guidance as to renewable electricity projects. The RMA gives significant potential for NPS to be effective in influencing and giving direction to decision makers about the necessary value judgments which are required when considering applications under Part 2 of the RMA.</p> <p>Meridian considers that it is appropriate that the NPS gives clear policy direction to local authorities as to the provisions they should include in their policy statements and plans, with regard to renewable electricity generation.</p> <p>Meridian believes that the introduction of a timeframe in the NPS for plan amendments should allow a sufficient period for different local authorities to prepare their necessary changes, new plans or variations, at different times.</p>
ECan (31), Tasman District Council (71), Greater Wellington Regional Council (104), Taranaki Whanganui Conservation Board (114), ARC (115)	NES instead of NPS for Policies 4 and 5.	Oppose	Meridian considers that it is appropriate that the NPS gives clear policy direction to local authorities as to the provisions they should include in their Policy Statements and Plans, with regard to renewable electricity generation.
New Zealand Wind Energy Association (52)	Support new policy regarding localised, more	Support	Meridian agrees that the new policy sought by the submitter would provide

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	than minor effects; transmission connections, construction effects, indirect mitigation and controlled activity status for minor upgrades and renewals		additional appropriate guidance to local authorities in order to achieve consistent provisions in Policy Statements and Plans which recognise the benefits of renewable electricity generation. It would also provide consistent direction on Plan provisions to address common issues associated with renewable electricity generation activities.
New Zealand Wind Energy Association (52)	Support new policy regarding reverse sensitivity around existing renewable generation	Support	<p>Meridian supports the inclusion of a new policy regarding reverse sensitivity effects around existing renewable generation.</p> <p>Reverse-sensitivity effects can pose significant issues for existing renewable generation infrastructure. For example, maximum generation output from existing hydro generation schemes can be diminished by increasing numbers of water takes upstream, which occur as a result of increasing land use development. Further, encroaching rural residential development in proximity to a wind farm can also compromise turbine generation potential by stricter operational conditions being imposed, as a result of noise concerns. The long time delay between when consent applications for major generation projects are lodged, and those consents granted, can exacerbate the potential for reverse sensitivity issues for new renewable generation projects, as the receiving environment may change quite dramatically during the consenting phase.</p>
Contact Energy Limited (64)	Recognise the need for peaker power stations	Oppose	The purpose of the NPS is to enable renewable electricity generation, not to comment on the requirements of the electricity system.
Helen Brosnan (63)	Fails to protect NZ freshwater resources	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities, such that 90 % of New Zealand's electricity will be

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			generated from renewable sources by 2025. It is not the role of the NPS to protect New Zealand's freshwater resources.
Fish and Game NZ Limited (112)	Recognise that free-flowing rivers are not renewable	Oppose	The role of the NPS is to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities, such that 90 % of New Zealand's electricity will be generated from renewable sources by 2025. It is not the role of the NPS on renewable electricity generation to address matters relating to 'free-flowing rivers'. Furthermore, the definition of renewable energy in the RMA specifically includes electricity generated from hydro sources.
ARC (115)	Include policy to minimise effects on residential and recreational amenity and rural character. Policy to avoid significant effects on natural, cultural, landscape values etc.	Oppose	The NPS does not preclude the need to take into account other relevant Part 2 matters when decisions are made regarding renewable electricity generation projects, in accordance with the statutory provisions of the RMA. As such, the matters addressed by the submitter will be considered, where relevant, as part of that process.