



**Further Submission on the proposed National Policy Statement for
Renewable Electricity Generation**

From


Contact Energy Limited

19 December 2008

To:

The Chairperson
Board of Inquiry
Proposed renewable electricity generation NPS
c/o PO Box 10362
Wellington 6143
By email to: renewable.electricity@mfe.govt.nz

1. This is a further submission on the proposed national policy statement for renewable electricity generation (“renewables NPS”) by Contact Energy Limited (“Contact”).
2. This submission relates to initial submissions made by other parties on the renewables NPS.
3. Details of Contact’s further submission are set out in Part A of this document.
4. Contact wishes to be heard in support of its submission.

Signed by: 

Date: 19 December 2008

A person authorised to sign this submission on behalf of Contact Energy Limited.

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Part A - Further comments on submissions

Submission Number	Name of Submitter	Policies/Sections of NPS Submitted on	Position	Reasons for submission and amendments sought	Contact Opposes / Supports	Contact Comments
2	NZ Petroleum Exploration and Production Association	Objective	Conditional support	Seeks inclusion of the following statement at the end of the objective: "this NPS makes no statement or judgement on non renewable projects."	Support	Contact supports this addition. As noted in its submission, Contact has a thermal station underway which will support renewable projects. The NPS should not discriminate against these non-renewable support plants.
		Policy 1	Not stated	"Policy One includes, at the end, an implicit recognition of the importance of diversity of supply, by type and/or location of electricity generation. This very diversity dictates interpreting and applying this NPS as not dealing with non-renewable generation and leaving non-renewable generation projects to be dealt with on their own merits."		
		Policy 2	Not stated	Considers the wording of Policy 2 is confusing. It appears to be saying that, for renewable generation activities, councils and decision makers can effectively bend the rules. This policy, coupled with broad wording in the NPS, may result in councils and decision makers assuming the role of an expert in matters of energy and electricity policy implementation.		
		Policy 3	Conditional support	Submits that the reference in Policy 3 to the "relative degree" of reversibility could potentially be relied on to require the Council or the Court to pass judgement on the relative merits of different projects. This trespasses on the role and capacity		

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				of relevant energy sector regulators and decision makers and is beyond the intended RMA inquiry. Requests the addition at the end of the words "in the context of the particular projects and given the broader needs of the relevant community." so that consideration being given to the relevant proposals is not merely an objective exercise of weighing up the pros and cons of different technologies themselves.		
		Policies 4 and 5	Not stated	Any plan changes resulting from these policies should expressly state that they are concerned only with renewable generation and not non-renewable generation, but that projects for the latter remain to be dealt with on their own merits.		
		General comments	Not stated	<p>Submits that the definition of the "national grid" is far too wide for the purposes of the NPS.</p> <p>The submitter considers:</p> <ul style="list-style-type: none"> - the NPS lacks clarity and, as a result, may be misinterpreted and misapplied by councils and decision makers; - there is no link with the wider energy strategy focused on security of supply; - Councils and decision makers will be left ill-equipped to reconcile competing government policies; - the NPS runs the risk of being construed as requiring councils and decision makers to favour renewable 		

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				<p>generation above all else, come what may.</p> <p>Considers that statements made in the Regulatory Impact Statement (RIS) are incorrect. In particular the statements that argue: an increase in the proportion of renewable electricity generation will support the development of a diverse and resilient electricity generation sector which, in turn will increase security of electricity supply; and that reducing our gas fired electricity generation will minimise our exposure to international gas fluctuations in oil and gas prices.</p> <p>Refer to full submission for reasons for opinion and analysis. See also attachment - "An analysis of the Effects of Renewable Energy Targets in the Electricity Sector on the NZ Gas Industry."</p>		
6	South Taranaki District Council	Policy 3	Not stated	Policy 3 - the term "reversibility" should be defined in the interpretation section of the NPS. "This is important so we can understand whether the effects have to be wholly reversed and whether reversibility carries with it a timeframe."	Support	Contact believes firmly that Policy 3 should be deleted. However, if the Board chooses to retain it, Contact supports this amendment as it would clarify the concept giving it some certainty of application.
		Policies 4 and 5	Not stated	Requests clarification if the term "enable." The Council seeks clarification as to whether it is intended to equate with Permitted Activity Status?		

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7	Rodney District Council	Objective	Conditional support	<p>Objective: Considers that the objective fails to recognise short and medium term fluctuations in some forms of renewable energy supply and the need to provide a secure energy supply at all times into the future. A secure electricity supply is essential for household amenity and economic development and this should be recognised within the objective.</p> <p>Amend objective as follows to recognise the need for a secure electricity supply:</p> <p>“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, and subject to the provision of a secure electricity supply, 90 per cent of New Zealand’s electricity will be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year).”</p> <p>Submission suggests other complementary measures.</p>	Support in part	Contact supports the recognition in this submission that an objective of 90% renewable generation (on average) will need the support of non-renewable generation sources to maintain security of supply.
		Policy 1	Conditional support	<p>Considers that that a wider range of benefits of renewable electricity generation be identified in Policy 1, including but not limited to;</p> <ul style="list-style-type: none"> - Security of supply - Reduction in greenhouse gas emissions 		

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				<ul style="list-style-type: none"> - Reduction in dependence on the national grid - Reduction in transmission losses - Reliability - Development benefits - Contribution to the renewable energy target. 		
		Policy 2	Support	Considers that Policy 2 adequately addresses a number of locational issues associated with renewable generation which is more constrained by the location of the resource than non-renewable generation which can be more foot loose. It also recognises that existing renewable generation facilities may have been established under less stringent environmental policy.		
		Policy 3	Oppose	<p>Considers that Policy 3 should be deleted. Reasons include: The policy fails to recognise the recreational and community benefit that may arise from hydro-lakes and relatively stable ecosystems that may exist for many years after construction. It also fails to recognise that the likely life of such facilities is considerable.</p> <p>The policy is also likely to be contrary to the NPS objective in that a significant proportion of the nations renewable electricity generation comes from hydro (approximately 62% of total electricity generation in 2005).</p>	Support	Contact agrees that hydro lakes bring community benefit.

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				<p>The policy in raising the issue of reversibility of adverse effects does not consider the scale of effects and nowhere else in the NPS are types of effects (i.e. area of land covered etc) given specific guidance.</p> <p>Refer to full submission for more information.</p>		
		Policies 4 and 5	Support	Considers that policies 4 and 5 will provide greater certainty for generators and greater control for Council over the generation of renewable energy and accordingly is supported.		
		Policy 5	Support	Especially important for Rodney District in enabling small scale generation in more remote areas after 2013 when the obligation for electricity companies to supply existing customers expires. Considered that this policy needs to be supported by wider government policy initiatives that make smaller scale generation more attractive to individuals.		
10	New Zealand Law Society	General comments	Not stated	"The section 32 evaluation fails to demonstrate that applications for renewable electricity generation projects have failed on account of consent authorities being unable (by reasons of statutory considerations) to take account of the national significance of renewable energy generation. Nor is a case presented that future applications are	Support in part; Oppose in part	Contact supports the submission's position that the policies as drafted do not achieve the Objective. However, Contact opposes the implication in the submission that an NPS on Renewable Generation will not assist decision making on resource consents for renewable generation projects.

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				<p>likely to fail for that reason."</p> <p>"The Committee submits that the policies in the NPS do not address the Government's concern nor the objective of the NPS because they do little to address the potential for delay in the consent process".</p> <p>"An NPS lacks sufficient status to be the decisive factor in determining whether a resource consent should be granted ... In the case of any resource consent application Part II must prevail in the event of competing values with other factors arising under Section 104, such as the provisions of the NPS. ."</p> <p>Tension between competing values is inherent to all RMA decision making. The NPS does not alter this... The NPS does not overcome the hurdles for renewable electricity generation that are inherent in the competing values articulated in Part II. It is simply a matter to be considered.</p>		
		Policies 1-3	Not stated	<p>Considers that the subject matters of policies 1 to 3 are already considered and provided for through decision of local authorities and the Environment Court..... in practice policies 1 to 3 add little that is new or helpful to the deliberative process.</p>		
		Policy 4	Not stated	<p>Submits that Policy 4 does not require policy statements and plans to be</p>		

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				amended to facilitate new generation projects. What is contemplated is facilitation of renewable energy prospecting. Yet the reasons for the NPS do not record a concern that investigations for new projects have been frustrated, but rather the passage of applications for resource consent for the resultant projects has faced hurdles."		
		Policy 5	Not stated	Policy 5 excludes offshore wind, tidal and wave generation projects. No explanation for that exclusion is given in the NPS ... it is not clear why policy support is excluded for small scale projects in the Coastal Marine Area given the undoubted energy potential of the sea and the research being conducted in that area."		
13	SPX Consultants	Policy 3 - reversibility	Conditional support	<p>Refer Attached Report on Reversibility of Renewable Developments prepared by SPX Consultants dated October 2008.</p> <p>Suggests that Policy 3 of the NPS is amended and that some definitions are added to better achieve the policy objective. The reasons for this are contained in the attached report (Reversibility of Renewable Energy Developments).</p> <p>Submits that Policy 3 should be reworded as follows: when considering proposals to develop new renewable electricity generation activities, decision-makers</p>	Oppose	Contact considers that a policy on reversibility is unnecessary as the concept is already addressed in the RMA definition of "effect". The policy should therefore be deleted not amended.

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				<p>must have particular regard to the relative degree ease of reversibility of the adverse environmental effects associated with the proposed generation development technologies.</p> <p>Recommends definitions of the following terms are added to the NPS (refer to submission for details):</p> <ul style="list-style-type: none"> - "Reversibility of adverse environmental effects" - "Geothermal development areas" - "All the current main renewable technologies have the same degree of reversibility, but differ in the ease of reversibility". - "Adverse effects will not only differ between technologies, but also between sites..." - Remove "relative"- removing redundant term improves clarity. - Define "adverse effects" in relation to the NPS 		
21	Conning, Linda	Other	Not stated	<p>The submission timeframe is less than 2 months. It also coincides with an election period. This is not appropriate. The Proposed NPS has not been well-promoted. Requests that the submission period be extended for another 6 weeks and publicise its existence.</p> <p>Whilst the benefits of renewable energy are supported, this should not be at any cost. This NPS is well-meaning but</p>		

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				<p>misguided.</p> <p>Its role in directing local authorities to plan for renewable energy is supported, but the heavy handed “its good at any price” is totally opposed</p> <p>Include new policies outlying what sort of areas should be ‘no-go” in terms of Section 6 of the RMA.</p> <p>This NPS makes renewable energy more important than any other values.It forces new generation on communities and the environment regardless of what it might destroy, and does not require any reduction in demand or consumption.This is not sustainable management! Make it clear that renewable energy does not “trump” other nationally important values.</p>		
		Policy 1	Not stated	<p>The contents are very vague and general.For example, Policy 1 refers to “any scale”. However at the same time it does not address the issues as to whether renewable energy is beneficial “at any location” or “of any nature”. Guidance should be given as to how and where locations for various types of renewable energy projects should be considered e.g. with windfarms, developers should be required to compensate and relocate residents within a 2km area to enable them to relocate.</p>	Oppose	Contact disagrees with the limitations that this submitter seeks to impose on this Policy. The effect of the amendments proposed is to dilute the guidance intended by an NPS. As this is the only Policy that identifies the benefits of renewable generation it is inappropriate to limit it as suggested. It is for the individual consent process to evaluate the benefits of a particular project.

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				<p>Re write Policy 1 so as to convey that renewable energy is to be favoured if it is appropriately located, at appropriate scale, and that those who are to suffer adverse effects are adequately compensated. "No-go" areas should be set out nationally to ensure our cultural and natural heritage is not destroyed for future generations by our short term desires to consume energy. Outside of these 'no-go' areas, local authorities, in consultation with their communities, need to consider at what locations and at what intensity of development various forms or renewable energy is appropriate. This should include 'favoured locations' as well as "no-go" areas.</p>		
		Policy 4	Not stated	<p>Policy 4 (i) is unclear with its references to objectives and policies, identification and "potential sites". Sure this should refer to "appropriate sites?"</p> <p>Policy 4 (ii) is also unclear – is this supposed to mean provisions for trialling renewable technologies? Or does it mean that local authorities are to carry out investigations themselves? (if so this is ridiculous, so I assume it means the former?)</p> <p>Re write Policy 4 (i) not refer to the identification of appropriate sites</p> <p>Clarify Policy 4 (ii) to allow for short term</p>		

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				consents for small-scale trials.		
23	King Country Energy Ltd	General comments	Not stated	King Country Energy operates small scale hydro electric schemes. Supports the vision and objective of the proposed NPS in principle. KCE is primarily concerned that the proposed NPS will significantly restrict hydroelectricity generation development and enhancement projects (when consent and re consenting) in New Zealand.		
		Objective	Support	Objective supported and recommends it be retained unmodified.		
		Policy 1	Conditional support	KCE considers that Policy One could be strengthened by increasing or further clarifying the list of benefits associated with renewable electricity generation. Refer to submission for suggested amendments.		
		Policy 2	Conditional support	The proposed NPS should be extended to provide direction to the removal of barriers of access to land, particularly with respect to conservation estate land. Amendments to Policy Two suggested - refer to submission for details.	Support in part	Contact supports the recognition in this submission that access to land is a barrier to some renewable generation projects.
		Policy 3	Oppose	KCE considers that Policy Three should be deleted. This policy is not consistent with the vision and objective of the proposed NPS as it will unnecessarily and without justification, restrict hydroelectricity generation development, enhancement and re consenting of existing hydroelectric power generation Schemes.		

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		Policy 4	Not stated	<p>While understanding the logic behind the development of Policy Four, KCE question its workability and pragmatism. KCE considers that it is more appropriate for local government to highlight areas of constraint in their regional and district plans than to highlight areas where renewable electricity generation proposals may be pursued/developed.</p> <p>Amendments to Policy Four suggested - refer to submission for details.</p>		
		Policy 5	Not stated	<p>The definition of small and community scale electricity generation as being projects that have an installed capacity of less than four megawatts is unnecessarily restrictive.... it is difficult to understand the environmental rationale for the establishment of the 4 MW threshold.</p> <p>Amendments to Policy Five are suggested to provide for a 10 MW threshold.</p> <p>Comments on the 2012 deadline in both Policies Four and Five "these policies do not specifically require local authorities to recognise the national significance of all (new and existing) renewable electricity generation proposals.</p>		
		New Policy	Not applicable	While the proposed NPS goes some way to promote the benefits of renewable electricity generation it should be		

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				<p>extended to specifically include statements regarding existing renewable electricity generation infrastructure and the consenting and/or enhancing of the same.</p> <p>A new Policy Six is suggested that requires decision makers, when considering proposals to consent and/or enhance existing renewable electricity generation activities, to have particular regard to the benefits associated with existing generation capacity and the existing environment.</p> <p>Refer to submission for wording.</p>		
24	Henderson, Chris	General comments	Not stated	<p>Submits that the government measures to increase efficiency of end-use of electricity -a specific requirement of Section 7 of the RMA has not been included in this analysis of the proposed NPS, is a major omission and skews the evaluations and eventual conclusions drawn.</p> <p>Considers that there needs to be a national public consensus regarding the call-in provisions as these could become Government decisions without adequate consultation.</p> <p>Considers that this NPS does not deal with public concerns , but seeks to bulldoze through 'enabling' legislation</p>	Oppose	Contact considers that this submitter misunderstands the purpose and role of an NPS.

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				<p>permitting generators more influence over local authority decisions for large-scale generation-wind or hydro.</p> <p>Submitter seeks that the NPS as suggested be set aside until New Zealanders have been given the opportunity to reassess the risk and opportunities now prevailing during this global recession.</p> <p>Investment in energy conservation and efficiency will deliver significant savings in electricity, releasing virtual renewable energy from already built hydro generation.</p>		
		Policy 1	Not stated	<p>Considers that Policy One seems to be focussed on putting pressure on local authorities to add a 'weighting' to any proposed new 'renewable' electricity generation , covert rather than overt, but there, nevertheless.</p> <p>All efforts need to be focussed on future-proofing domestic, public, commercial and industrial buildings and taking as much pressure as possible off the national grid. This policy will not do that.</p>		
		Policy 2	Oppose	Considers policy 2 to be inappropriate as it is not conducive to good decision making and should be rejected.		
		Policy 3	Not stated	This has very limited positive potential unless generators are required to pay a		

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				bond upfront for the de-commissioning of all structures associated with new industrial wind or hydro generation.		
		Policy 4	Oppose	<p>The removal of unnecessary barriers to generators...5.2.4.2 first paragraph - needs further explanation. Generators should not be allowed carte blanche when ostensibly investigating new industrial wind farm or hydro-generation sites.</p> <p>A Landscape NPS needs to be in place first before any decisions are made about the suitability of new Industrial Wind farm sites.</p> <p>Support for new emerging technologies can be at Government level where the costs and benefits have national agreement after extensive meaningful public consultation.</p> <p>Does not support Policy 4 as written.</p>		
		Policy 5	Not stated	<p>Small and community-scale distributed energy generation has a part to play in future-proofing individual buildings and supporting small communities while taking pressure off the national grid, and reducing the need for further large-scale generation.</p> <p>However, it is not demonstrated through this paper what is meant by 'enable' and 'unnecessary barriers', except the</p>		

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				<p>financial expenses incurred when applying for resource consents which are presumably considered fully justifiable by the local authority processing them.</p> <p>The cumulative effects of area-wide small-scale wind turbines, for instance, need to be considered.</p> <p>As part of a negawatt strategy, distributed energy could be a positive alternative to large-scale projects but should not need a policy such as this .</p>		
28	Waikato District Council	General comments	Not stated	Support for the NPS in principle but considers that minor changes would be beneficial for clarity.		
		Objective	Conditional support	<p>The Council is concerned that while the objective recognises the need of increasing the use of renewable sources, the objective does not consider that adverse effects on the environment that may occur from these activities in achieving this target.</p> <p>Recommends amendments to the objective to add the phrase "while managing the adverse effects of these activities".</p> <p>The council seeks that further direction is provided to enable decision-makers to adequately consider and balance the competing values of nationally significant benefits contained in the NPS and the</p>	Oppose	Evaluation of the adverse effects on the environment is an inherent part of the consent process for a particular project. It is inappropriate to limit the Objective of an NPS in the way suggested.

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				possible inability to adequately avoid, remedy or mitigate any adverse environmental effects.		
		Policy 1	Support	The Council support Policy 1. The Council supports the direction of the policy to apply when resource consent decisions are being made as well as at the time of development of regional and district plans.		
		Policy 2	Conditional support	While there is concern that Policy 2 could hold favour in projects, Council considers that decision-makers should still weigh up all competing values during their considerations and that this policy should not be used in a manner which would negate any assessment of effects. Council recommends retaining Policy 2 and seeks additional guidance material on how to assess constraints.		
		Policy 3	Conditional support	The Council supports Policy 3 there is a possibility that 'reversibility' will be open to interpretation and that a definition what is acceptable as 'reversibility' would be beneficial and provide clarity. Seeks a definition of reversibility be included "along the lines of 'the partial or complete removal of the structure results in the surrounding environment returning to a state that is comparable to its pre-development state/original condition'.		
		Policy 4	Conditional	The council supports Policy Four but		

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			support	<p>considers that minor wording changes would be appropriate for clarity.</p> <p>Seeks the following amendment ".. with Schedule 1 of the Act, a plan change, proposed plan or variation to ensure that objectives, policies and, where appropriate, methods are included into policy statements and plans.</p> <p>Add a definition of "research scale investigation" .</p>		
		Policy 5	Support	Support Policy 5 and seeks it be retained.		
30	Porirua City Council	Other	Not stated	<p>Porirua City Council supports the proposed NPS in principle, however the Council has concerns that:</p> <ol style="list-style-type: none"> 1.The requirement in Policy 3 does not adequately address reversibility of renewable electricity generation technologies. 2. The requirements in Policies 4 and 5 to notify plan changes, proposed plans or variations by March 2012 are unnecessarily onerous and arbitrary. If it is desirable to retain these policies in some form, then the emphasis should be an enabling one, not a requirement. 3. There is an important aspect about priorities in relation to Part II of the Resource Management Act 1991 that does not appear to have been addressed in the proposed NPS, which the Council 		

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				would like to be addressed.		
		Policy 3	Conditional support	<p>The concept of having regard to the relative degree of reversibility is laudable in its intent, however it is of questionable usefulness in achieving targets for renewable electricity generation, and it is merely one aspect to consider in assessing effects. Furthermore, there is no priority or weighting afforded to it in the policy, and the way the requirement is expressed in the policy is lacking in specificity.</p> <p>If this policy is to be retained, the Council would prefer to see the requirement expanded to include consideration of the cost of implementing reversibility and/or the barriers to reversibility, as this would make the purpose of the requirement more practical.</p> <p>Rewording suggested: "When considering proposals to develop new renewable electricity generation activities, decision makers should take into account the relative degree of reversibility of the adverse effects on the environment associated with the proposed generation technologies, including barriers to implementing reversibility, such as the cost of implementing reversibility, and the opportunity cost of decommissioning the generation activity after it has been established."</p>	Oppose	Contact considers that a policy on reversibility is unnecessary as the concept is already addressed in the RMA definition of "effect". The policy should therefore be deleted not amended.

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		Policy 4	Not stated	Having gone through preparation and notification of this proposed plan change, the Council does not see anything would be gained by having to notify a further enabling proposed plan change or variation to enable identification of renewable electricity generation possibilities. In view of this, the requirement in Policy 4 of the proposed NPS to introduce a further plan change in March 2012, is likely to impose an onerous burden of expense that is of questionable necessity.		
		Policy 5	Not stated	<p>The requirement in Policy 5 to notify a further plan change by March 2012 to provide for small and community-scale distributed renewable electricity of less than 4 megawatts is arbitrary and ambiguous, and bears little correlation to potential adverse effects. For example, a 4 megawatt wind turbine is likely to be amongst the largest wind turbines currently available, and there is no anticipation of cumulative adverse effects in Policy 5. This results in uncertainty. ...</p> <p>The Council would prefer to have renewable electricity generation facilities assessed on the basis of their effects, rather than adopting some arbitrary standard that generates uncertainty.</p>		
		New Policy	Not applicable	Recommends that a policy is required pertaining to the relative priority to be afforded to consideration of "the benefits		

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				to be derived from the use and development of renewable energy" in Section 7 of the Resource Management Act 1991, in comparison to other matters requiring consideration in Part II of the Act. The Council has no suggestion as to how this should be prioritised, however some national direction on this matter is clearly appropriate, and the proposed NPS provides an opportunity to achieve this.		
32	Tauranga City Council	General comments	Not stated	<p>Tauranga City Council does not support objectives and policies as proposed as these are not clear and do not articulate the national interest, rather require Councils to undertake a significant amount of new assessment, analysis and policy development (which is at the territorial authorities ratepayers expense). It is highly questionable whether the outcome of this work will then deliver the overall outcome sought...</p> <p>TCC submits that even though the overall objective is clear, there appears to be a discrepancy between the objective and the preamble. That the Proposed NPS clearly articulate the national interest and issue through the Preamble and Objective.</p>		
		Objective	Not stated	Submitter requests that the objective is redrafted to reflect that even though this matter is important, it is not of national significance under the RMA. Submitter	Oppose	Contact considers that the Objective is one of national significance, so therefore opposes this amendment.

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				suggests amended wording for the Objective - refer to submission for details.		
		Policy 1	Conditional support	<p>Submitter requests that further work should be undertaken to develop a stronger list of benefits that can be derived from renewable electricity generation to aid decision makers in making decisions.</p> <p>That the use of the term 'must' be replaced with the term 'shall.'</p>		
		Policy 2	Oppose	<p>TCC sees that this policy is in fact contrary to the RMA with its underlying premise to manage adverse effects on the environment.</p> <p>Submitter requests that the policy be removed or alternatively "that the statement in the Section 32 report "policy 2 seeks to tip the balance in favour of renewable electricity projects that, for reasons deriving from practical constraints, might otherwise fail to gain a commercially viable resource consent" be removed.</p>		
		Policy 3	Oppose	Tauranga City Council does not support this policy and seeks for it to be removed. This policy does not add clarity and does not enable decision makers to consider applications on their merits.		
		Policy 4	Oppose	The council questions whether this policy is necessary and how it relates to delivering the objective.		

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				<p>The submitter considers that the use of the term 'enable' is inappropriate and should be defined or another used in its place to define what is actually expected.</p> <p>TCC does not support this Policy and seeks for it to be removed.</p>		
		Policy 5	Oppose	<p>TCC questions whether a 4MW threshold is appropriate and does not support the threshold of 4MW without further information being provided on what type of renewable activities 4MW actually entails to enable consideration of the actual effects on the environment.</p> <p>The use of the term enable is also required to be defined.</p> <p>Policy is open to interpretation and further clarification is required.</p> <p>Technical assistance to councils required.</p> <p>TCC does not support this policy and seeks for it to be removed.</p>		
		New Policy	Not applicable	<p>Submitter request policy worded below : "Planning and development of renewable electricity generation should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character, areas of high cultural or recreational value and amenity and</p>	Oppose	It is inappropriate to limit the Objective of the NPS by introduction of this Policy. Landscape issues are assessed as part of an individual application.

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				existing sensitive activities including urban areas."		
34	Nelson/Tasman Branch of the Royal Forest and Bird Protection Society	General comments	Conditional support	<p>While supportive of the concept of renewable electricity generation and the general policies, considers that there is not enough consideration given in the policies to the protection of natural places and species.</p> <p>Considers that the NPS needs to be linked with energy efficiency and conservation measures.</p> <p>Endorses the principle of guidance for energy projects if it helps producers to think carefully and to assess the environmental costs as well as the economic so no more inappropriate schemes, like that proposed dam on the Mokihinui, are mooted.</p> <p>Has great concern that the policies proposed will weaken the RMA and public consultation processes (note a request was made on 31/10/2008 that this point be added to their submission).</p>		
		General comments	Conditional support	<p>Submitter seeks the following changes : The addition of the words "biodiversity-friendly" before the words "renewable electricity generation" as a matter of national significance; Recognising the importance of environmental protection in the 'Objective';</p>	Oppose	<p>Contact opposes the proposed amendments.</p> <p>Contact opposes the addition of "bio-diversity friendly" to the text. The limitation is inappropriate in an NPS and is an adverse effect that is considered in the context of an individual application</p>

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				An assessment of actual future electricity needs taking into consideration the savings which can be made by more efficient use and energy conservation measures so that any development is actually needed and not just because it is possible.		Recognising the importance of environmental protection could act as a disincentive to the development of renewable generation. The RMA is an enabling Act. Contact opposes the assessment of actual future electricity needs as it is a function already performed by the market and the Electricity Commission. Developers of generation also assess whether there is a need for a renewable energy source, so such an assessment is not appropriate in the NPS.
37	Fonterra	General comments	Oppose	Fonterra does not support the proposed NPS in its current state for the following reasons: Neither the NPS nor the Section 32 report adequately considers the costs or consequences, both social and economic, of promoting (prioritising) access to resources (e.g. water) for activities to develop, maintain, or operate renewable electricity generation over the needs of other, competing resource use activities. By focussing solely on the intersect between electricity generation related green house gas emissions (i.e. climate change and costs) and the environmental impacts of renewable electricity generation infrastructure, the broad economic and social goals of New Zealand may not have received sufficient		

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				<p>consideration. In particular, consideration has not been given to how this NPS would interact with the proposed NPS on Freshwater (currently being consulted on) or the wider Sustainable Water Programme of Action.</p> <p>The NPS and Section 32 report seem to assume, incorrectly in the opinion of Fonterra, that the use of resources for the generation of renewable electricity will always provide the greatest net benefit to New Zealand.</p>		
		General comments	Not applicable	<p>Fonterra recommends that: The NPS be re-assessed against the broader and social, economic and environmental impacts that are likely to occur if it were implemented, specifically the economic and social impacts of prioritisation of water use away from other water dependent activities such as agriculture;</p> <p>The NPS be considered in the context of other related policy currently under consideration, specifically the NPS on Fresh Water, to ensure that an environment of conflicting policy and objectives is not implemented;</p> <p>The potential impacts of distorting resource management decision making through promotion (prioritisation) of renewable electricity generation be</p>		

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				<p>reconsidered with specific focus on the relative net national benefits of differing resource uses, most especially water, being considered in greater detail; and</p> <p>The potential impacts of distorting resource management decision making through promotion (prioritisation) of renewable electricity generation be reconsidered with specific focus on the opportunity for competing resource users to access alternative resources (e.g. agriculture needs water and has no alternative while there are renewable means of generating electricity that do not require water).</p>		
		Policy 3	Support	<p>Fonterra further recommends that if the proposed NPS were to be progressed, Policy 3 (having regard to the relative reversibility of adverse effects associated with particular generation types) must be retained. While an important consideration environmentally, it is also an important consideration given the vital nature of resources such as water to a number of other sectors and activities. Locking resources up within a non-reversible activity would not provide for flexibility in future decision making or activities.</p>	Oppose	<p>The submitter's concern appears to be water allocation. That issue is better addressed in the specific NPS relating to Freshwater.</p>
42	Windflow Technology Ltd	General comments	Not stated	<p>... Central government should give clear direction to local government about the treatment of renewable electricity generation (and wind power in particular)</p>		

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				on a consistent basis throughout the country if we are to achieve the goal of 90% renewable electricity by 2025. The RMA's core principle is sustainable development and this NPS should re-emphasise that core principle by directing local government to plan for renewable electricity developments, rather than relying on the ad hoc process of resource consents for noncomplying activities.		
		Policy 1	Conditional support	The NPS should list the actual national benefits of each form of renewable electricity generation, including wind power, and these national benefits should be included along with any local benefits in district and regional council plans so that these national and local benefits do not have to be debated in consent hearings.		
		Policy 2	Not stated	Considers Policy 2 is too vague. Suggest NPS require district plans to recognise where a good renewable electricity generation resource exists close to existing infrastructure and make a certain amount of it a permitted or discretionary activity in that location. See also recommendation under policy 4. It should also recognise this in relation to potential developments in the area that could result in this area no longer being able to be used for renewable electricity. In particular if an area is identified as particularly well suited to wind power generation, do not allow houses to be		

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				built within a certain area of it.		
		Policy 3	Support	Supports the proposal that district and regional council plans should compare the relative reversibility of renewable electricity's adverse effects against non-renewable because this will recognise the additional benefits of renewable electricity, particularly with regard to carbon reduction which is the main objective. Because the adverse effects of wind power are typically minor, plans should list the adverse effects of wind power which need to be addressed in any consent applications so the list does not have to be debated in each hearing.		
		Policy 4	Not stated	<p>Recommends that to be effective the NPS should go further than simply enabling identification. It should give quantitative guidance to councils as to the quantum of renewable electricity generation they should plan for in their territories. For example we would propose a guideline to district councils that their next LTCCP should designate 1% of their territory for wind farming as a permitted activity ..."</p> <p>In addition and outside of the plan change process, the NPS should require that temporary met masts to measure wind should be a permitted activity, and this could be implemented immediately.</p>		
		Policy 5	Conditional	As stated in the Section 32 evaluation		

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			support	<p>“Other legislation has been amended to define small-scale generation as up to 10 MW installed capacity and legislative consistency is desirable where appropriate”. We therefore recommend that the definition of small and community-scale renewable electricity generation is up to 10 MW.</p> <p>To address the issue of cumulative effects of small-scale projects, the definition of small-scale projects will need to have a guideline about physical separation from the nearest existing project using the same form of renewable electricity generation which we submit should be at least 3 km.</p> <p>For wind power to make its maximum contribution to New Zealand's future, some areas will inevitably have much more than 10 MW installed. This should be planned, rather than happen by a process of case-by-case project consenting with its associated issues about unplanned cumulative effects. See also recommendation on Policy 4 which, if adopted, would logically lead to this policy 5 applying to additional areas outside the main areas in which wind power is permitted without the 10 MW limit of project size. The commercial viability of small projects up to 10 MW</p>	Oppose	<p>While the amendment the submitter seeks may be appropriate in some specific situations, it is not universally so. For example, it is inappropriate in relation to hydro or solar generation. The effects the submitter is concerned about are matters to be addressed in evaluating individual applications.</p>

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				would be helped by making the resource consent process less onerous and more certain for smaller projects by the proposed required plan changes or variations to better enable these smaller projects.		
46	Otago Fish and Game Council	General comments	Conditional support	<p>The NPS on renewable energy should be amended to reinforce the protection of the rivers, and landscapes in highly sensitive locations.</p> <p>Renewable energy development needs to be steered away from hydro development towards:</p> <ul style="list-style-type: none"> - Geothermal energy sources; Wind power in areas other than those highly sensitive to landscape impacts; Small scale energy generation (eg solar power) <p>In addition New Zealand needs to address energy supply and demand issues by:</p> <ul style="list-style-type: none"> - Siting generation close to end users; Transmission loss; Recognising the disproportionate contribution to energy production that some regions are already making from the development of natural resources (for example Otago); Encouraging or requiring dispersed energy production, particularly amongst some sectors of industry (eg dairy); Discourage those industries that are very heavy energy users and encouraging those that are not; Encouraging or 	<p>Oppose</p> <p>Oppose</p>	<p>Having sensitive areas defined in an NPS is inflexible and inappropriate.</p> <p>If the 90 per cent renewable target is to be met then, as noted in our submission, according to the analysis of the Electricity Commission, the renewable sources available to NZ cannot be limited in this way.</p>

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				requiring much greater levels of energy conservation; Giving weight to factors such as environmental impacts and reversibility.		
		Policy 3	Conditional support	Recommends Policy 3 is amended so that the heavy contribution that rivers have already made to renewable energy production is recognised by more heavily weighting the balance against further river development where there are important natural or amenity values or where significant development has already taken place within a region or where development is a long way from end users.	Oppose	On rivers where significant developments have already taken place there may be further opportunities which should not be dismissed without proper assessment of their potential.
50	Auckland Conservation Board.	Policy 1	Conditional support	Policy 1 part ii "maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation." Proposes the following changes to the draft policy: the words "at an appropriate scale with due regard for the wider ecosystem, local community and iwi concerns" should be added. "Due regard" means that if there is any doubt, the wishes of the local community and hapu/iwi who have traditionally upheld ahikaa in the region WILL prevail.		
		Policy 2	Conditional support	Supports the first paragraph of Policy 2 and provision 'i' and submits that these must be robust and specific.	Oppose	The protectionist limitations that the submitter seeks are inappropriate for an NPS promulgated under the enabling mandate of the RMA.

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				<p>Submits that this policy should clearly specify that any application for electricity generation (aside from micro scale units to support huts, visitor facilities or scientific installations) will NEVER be allowed in or near a Marine Mammal Sanctuary, Marine Protected Area, Marine Reserve, National Park, Conservation Stewardship Area or any intercoastal area where migratory birds feed, in the flight path of migratory or local birds or in the main entrance channel to harbours where marine mammals and elasmobranchs (sharks and rays) may feed or breed.</p> <p>With further regard to Policy 2 (i) nature and location, the Board submits that this policy should clearly differentiate between projects using proven technology e.g. solar panels or wind turbines, on private land largely removed from public view, where the local community have few concerns and environmental values are not greatly compromised, compared with highly invasive proposals implying exclusive occupation of public domain with the loss of natural values and potential for irreversible environmental damage.</p> <p>Refer to submission for further comments on Policy 2.</p>		
		Policy 3	Support	The Conservation Board strongly	Oppose	The protectionist limitations that the submitter

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				<p>supports this policy, and wishes to draw attention to the practicalities of small scale surface electricity generation using solar panels, wind turbines, and micro hydro generation schemes which can readily be removed leaving no trace at any time should they breakdown, prove harmful in any way, or are superseded by more efficient and safer technology. This last is one of the reasons why it considers large scale marine installations with high capital costs and a proposed life of 45 years, which cannot or will not be readily removed, are totally inappropriate in the New Zealand environment.</p>		<p>seeks are inappropriate for an NPS promulgated under the enabling mandate of the RMA.</p>
		Policy 4	Not stated	<p>With regards to provision 'i' the Conservation Board submits that high level national policy should be under pinned with a robust regulatory framework to clearly identify sites and potential energy sources of environmental significance that should NEVER be considered for electricity generation of any type.</p> <p>With regard to provision 'ii' the Conservation Board submits that public investment in research of renewable electricity technologies in the NZ context, should be encouraged to concentrate on development of affordable, more efficient, well proven methods such as small scale solar, water & wind power equipmen ... In</p>		

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				<p>addition, the provision of low cost or free nett metering equipment to enable surplus power generated to be returned to the national grid and reduce the requirement for storage batteries, should be a priority. Storage battery technology is another major area for development, also lighter, more compact and efficient wind turbines which can more easily be erected with lower environmental impact.</p> <p>Refer to submission for further comments.</p>		
		Policy 5	Not stated	The Conservation Board submits that individual or community small scale generation should be enabled without expensive compliance regimes, and integrated into the building code to allow it to be incorporated as standard best practice in any new building or renovation, to enable individuals and local communities to be self supporting for basic needs, to reduce their living costs and to protect the environment in a sustainable fashion.		
51	Ecologic	Objective 1	Oppose	<p>Considers the proposed Objective is poorly specified - refer to submission for 5 specific reasons why.</p> <p>Recommends the proposed Objective should be restated as follows:</p> <p>To recognise the national significance of avoiding greenhouse gas emissions</p>	Oppose	The proposed amendment would preclude geothermal generation which is a renewable

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				<p>associated with electricity generation, by:</p> <ul style="list-style-type: none"> i. facilitating the upgrading, maintenance and operation of those existing electricity generating activities which are free of operational greenhouse gas emissions; ii. facilitating the development, upgrading, maintenance and operation of new electricity generation facilities which do not emit greenhouse gases in the course of their operation and have a low carbon footprint for their construction and maintenance; <p>while minimising the adverse environmental effects associated with moving the electricity generation and transmission system on to a basis that is 90 percent renewable by 2025 (based on delivered electricity in an average hydrological year).</p> <p>Delete definitions of “renewable electricity generation” and “renewable electricity generation activities.”</p>		source vital to New Zealand's future.
		Policy 3	Conditional support	<p>Recommends Policy 3 be upheld, and if possible made more specific and given more weight. Attached as an Appendix to its submission, Ecologic'searlier submission on this topic dated 9 November 2007. This sets out information on the potentially high risks which the National Policy Statement may pose to many of New Zealand's remaining natural rivers, and the importance of</p>		

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				<p>introducing a concept of reversibility, which is integral to the notion of sustainable management of resources. Pleased that the proposed NPS has taken up the concept of reversibility promoted in its submission.</p> <p>Recommends amending Policy 3 as follows: "When considering proposals to develop new electricity generation activities of the type covered by this National Policy Statement, to avoid those which have large adverse effects which cannot be reversed, or which can only be reversed at high cost and/or over long periods of time."</p>		
59	New Zealand Historic Places Trust	General comments	Not stated	<p>The NPS should assist in achieving section 6(f) of the RMA.</p> <p>Recommends national guidance be prepared for RMA section 6 landscape-related matters including outstanding natural features and landscapes, significant indigenous vegetation, indigenous fauna habitats, Maori heritage, historic heritage and recognized customary activities.</p> <p>The NPS should give greater recognition to the principles of the Treaty of Waitangi.</p> <p>Amend the preamble to recognize the</p>	Opposes in part	Contact considers that giving greater recognition to the principles of the Treaty of Waitangi is unnecessary as this NPS is developed under the RMA which already incorporates this.

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				complex costs and benefits of renewable electricity generation and provide greater recognition of Maori values and the principles of the Treaty of Waitangi.		
		Objective 1	Conditional support	Recommends an amendment to recognise the Government's intention to safeguard the environment.	Oppose	This is an inappropriate limitation on an enabling document.
		Policy 1	Conditional support	Recommends amendments to recognise the costs and benefits of renewable electricity generation activities.		
		Policy 2	Conditional support	Recommends amendments to ensure the range of adverse environmental effects should be avoided, remedied or mitigated.		
		Policy 3	Oppose	Delete policy 3 or delete the words 'relative degree of reversibility to a degree' and replace with a policy that is broad enough to include consideration of all relevant adverse environmental effects.	Oppose in part; Support in part	Contact supports the deletion of this Policy. Contact does not support the alternative relief of the text proposed as what is sought is already part of the framework of the Act.
		Policy 4	Conditional support	Recommends amendment to provide for the introduction of appropriate objectives, policies and methods to promote appropriate renewable electricity generation.		
		Policy 5	Conditional support	Recommends an amendment to provide for the introduction of appropriate objectives, policies and methods to promote appropriate small and community scale renewable electricity generation that have minimal		

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				environmental effects.		
60	Waikato Raupatu Trustee Company Ltd	General comments	Not applicable	Submits that based on the amount of electricity generation currently in the Waikato region, it should be excluded from increasing demand to supply energy.	Oppose	This limitation is inappropriate in an enabling NPS. Just as the NPS should not identify and support particular sources of generation, neither should it direct where that should, or should not, occur, Each application should be assessed on its merits.
		Objective 1	Not stated	Considers that the objective is not fulfilled by the current policies in NPS. It does not set a clear expectation that requires local authorities to take specific steps which enable generation development within targeted timeframes. Waikato-Tainui is resolute in stating that a Tangata Whenua policy should be included.		
		Policy 2	Conditional support	Waikato-Tainui would like to include the following as point (v) of policy two: "(v) the location of sites of significance to iwi."		
		Policy 3	Not stated	Waikato-Tainui support the thought of a degree of reversability when the life of the technology generating the energy is no longer required, however, this benefit should not be offset by allowing further if not greater short term degradation to the surrounding environment.		
		Policy 4	Not stated	Waikato-Tainui would like the board to set further timeframes which enable local authorities to assess and prioritise the types of activities to be enabled in their jurisdiction.		

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				Waikato Tainui insists that all Iwi are directly involved in decision making on subsequent proposals, in order to ensure that the renewable energy 'goldrush' does not have dire consequences on our area of responsibility.		
		Policy 5	Not stated	Waikato-Tainui would prefer that (if sustainable), energy sources should be located nearer to the area of demand.		
68	Waitaki Protection Trust	General comments	Support	<p>The Trust fully supports the NPS.</p> <p>New Zealand is quite favourable place to undertake a transition back to 90% renewables in electricity over the next decade and a half.</p> <p>More 'run-of-the-river' generation will worsen the security of supply and expose the national economy to increased supply risk and prices.</p> <p>Hydro generation is no longer environmentally sustainable, in contrast to a number of alternate energy generation options such as wind power.</p> <p>Wind turbines can be dismantled and removed. The adverse effects of hydro development are irreversible and cannot be avoided.</p> <p>In the South Island, there are very few major river systems that now remain unaffected by hydro development.</p>	Oppose in Part	It is not the place of an NPS on renewable generation to favour particular sources of generation thus "picking winners".

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				<p>Increased use of wind can allow for existing water resource in Hydro generators to be stored.</p> <p>Policies which encourage renewable energy will ensure that security of supply is maintained.</p>		
69	Waitakere City Council	Other	In Part	<p>Waitakere City supports the intent of the NPS. Considers that a secure, resilient, efficient and sustainable energy system is vital to the achievement of the purpose of the Act. Officers of the Council provided comment to MfE on a possible NPS on Renewable Energy Generation under section 46 (refer to Appendix A).</p> <p>The recently passed Waitakere Ranges Heritage Area Act 2008 requires decision makers to 'have particular regard to' any NPS when considering resource consent and plan change applications that impact on the Waitakere Ranges Heritage Area. This provision may therefore result in a perverse outcome, where large scale renewable projects are more enabled or 'directed' to the Heritage Area.</p> <p>Waitakere has some minor concerns with the NPS as proposed these include:</p> <p>The proposed policies do not provide the certainty and assurance that would be</p>		

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				<p>required to reduce inter-authority variation, provide certainty for applicants, and result in the Objective being achieved;</p> <p>The effects (and benefits) of generation from each type of renewable energy resource are very different. The broadness of the policies does not suggest ways and means of, nor assist local authorities in developing policies, to address these conflicting demands.</p> <p>Submits that there is no assistance for decision makers in the NPS about actually balancing the acknowledged positive aspects (which are already outlined in the Resource Management Act 1991 at section 7) with adverse effects on the other important matters in sections 6 and 7.</p> <p>The section 32 report also outlines that a key benefit of the NPS is to assist decision makers in balancing these concerns. However, the NPS only outlines that there are benefits of renewable generation, without outlining how these benefits should, could or would be balanced against competing adverse impacts.</p> <p>Waitakere's submission also touches</p>		

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				<p>onnumber of other related matters that potentially fall beyond the scope of the terms of reference for this Inquiry which it considers should also be addressed if the Objective of the NPS is to be achieved. Its submission has included these 'non-NPS' matters as they may form part of the Board's broader recommendations to the Minister. Refer to section 3, pages 6 - 8, of Waitakere's submission for details.</p>		
		<p>Objective 1 - national significance</p>	<p>Conditional support</p>	<p>Waitakere City Council supports the objective of the NPS.</p> <p>However, submits that there seems to be a mismatch between the problem outlined in the preamble and the objective. The preamble suggests that the current problem is how to provide a 'nationally consistent approach to balancing competing values associated with the development of New Zealand's renewable energy resources'.</p> <p>Waitakere queries whether this policy is going to achieve any more than what is provided already through the NZES in terms of national direction and through section 7 of the RMA.</p> <p>Submits that the NPS should provide guidance on how councils are to balance competing values, particularly balancing the sometimes contradictory matters</p>		

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				outlined in sections 6 and 7, and the benefits of renewable energy which is a stated aim of the NPS as outlined in the preamble, and in the section 32 report.		
		Policy 1	Conditional support	<p>Waitakere questions what value this statement would provide over section 7 (ba), (i) and (j) of the Resource Management Act 1991.</p> <p>Waitakere questions how policy 1 will clarify and assist decision makers to balance a matter of national significance (more renewable generation) with matters of national importance.</p> <p>Waitakere seeks that this 'benefits' policy statement is balanced elsewhere in the NPS by an 'effects of renewable generation' policy or other suitable method, which should be provided to assist decision makers address the stated problem, as outlined in the preamble, of balancing competing values.</p>	Oppose	Contact does not consider that an additional policy relating to the "effects of renewable generation" is necessary. "Effects" are assessed on a case by case basis in the consent process.
		Policy 2	Conditional support	Waitakere is concerned that the result of an interpretation of Policy 2 as outlined in the s32 report may be that projects previously considered unviable or environmentally unacceptable (due to valid concerns around adverse effects, resulting in an expectation from applicants that significant mitigation or remediation conditions would be imposed) would now be considered for	Oppose	Contact does not consider that Policy 2 as drafted limits Council's ability to impose conditions to avoid, remedy or mitigate effects.

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				<p>consenting, due to the reduced ability of decision makers to impose conditions to avoid, remedy or mitigate those adverse effects.</p> <p>This concern is further enhanced by the lack of a balancing policy around how these practical constraints, and national benefits, should be balanced with effects on matters of local, regional or national importance, as discussed in the previous section.</p>		
		Policy 3	Conditional support	<p>Submits that Policy 3 requires considerable clarification if it is to be effective. The policy does not provide decision makers with assistance on considering a proposal on its merits. As worded, the policy raises the following questions:</p> <ul style="list-style-type: none"> • What particular adverse effects of renewable generation (noting the effects of generating from each resource are very different) are reversible? • Relative to what? • Should decision makers assume that a renewable generation activity will cease (and require information on this) to allow consideration of this 'benefit'? <p>A perverse outcome of this policy maybe to grant consents with shorter timeframes than would otherwise be expected, or commercially viable, requiring multiple applications for extensions of time etc, or</p>		

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				<p>the imposition of significant bonds or other conditions that may have the effect of frustrating long term certainty of the project.</p> <p>Waitakere also questions how likely are the effects to be reversed? It is suggested that it is far more likely that a successful generation development utilising a geographically constrained renewable resource will be expanded and upgraded over time than removed, particularly as the country and world moves to a carbon constrained future.</p> <p>It is submitted that the policy could be clarified by rewording or additional policies which answer the questions raised above.</p>		
		Policy 4	Conditional support	<p>Waitakere considers that Policy 4 would benefit from clarification, particularly around answering the following questions:</p> <ul style="list-style-type: none"> • How big is 'research scale'? • In the context of the emerging and rapidly advancing science of renewable electricity generation, how new and cutting edge are 'emerging technologies'? • Arguably all renewables are 'emerging' and most installations are specific to the particular site and resource – are all applications to some extent 'research scale' on this basis? 		

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				<p>Without policy guidance in the NPS, it will be left for local authorities, either on their own or in ad-hoc association, to attempt to answer these questions, resulting in unnecessary plan development costs, delays, and increased potential for appeals. Guidance on these issues will be required in the NPS to ensure a nationally consistent approach to enabling identification of renewable energy resources and facilitating 'research scale investigations into emerging electricity generation technologies and methods'.</p> <p>Waitakere asks that clear definitions be added to the interpretation section for these terms, keeping in mind that there is a variety of renewable resources and methods of investigation, depending on the resource being investigated.</p>		
		Policy 5	Conditional support	<p>Waitakere fully supports the intention to differentiate and enable small scale renewable energy generation, particularly at the domestic, business or community scale.</p> <p>Highlights that the size, scale and effect of renewable generation varies with the resource being exploited, and the state of technology, and it is questioned whether a blanket 'output' based threshold is a suitable method to determine the</p>		

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				<p>threshold at which generation should be enabled.</p> <p>Also questions whether the 4MW limit is too high, particularly as the energy output of any renewable energy device is only partially correlated to its effects, and the reasons for selection of a 4MW limit is not adequately discussed in the s32 report.</p> <p>Waitakere submits that the NPS include a range of output thresholds to be developed specific to each generation type, which may include energy output, but also physical aspects such size, scale, height, or other similar criteria that actually relate to the level of effect.</p>		
71	Tasman District Council	General comments	Not stated	The Council seeks the following changes to the proposal: Incorporation after investigation and consultation of national policy statement provisions addressing in an integrated manner, the opportunities and priorities as appropriate, for the development of energy from renewable biomass and heat sources.		
		Objective 1	Conditional support	The Council seeks the following changes to the proposal: That the objective be amended to delete reference to the target of 90% of electricity generation from renewable sources by 2025; and that the following	Oppose	Contact considers that the limitation of the Objective proposed is inappropriate in an enabling NPS.

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				text or text to like effect be inserted: consistent with the provision for other significant values of land, water and coastal resources.		
		Policy 1	Conditional support	The Council seeks the following changes to Policy 1: <ul style="list-style-type: none"> •Give guidance on the suite of benefits and on the adverse effects as opportunity costs arising from the electricity generation end-use of renewable resource sites •Clarify the priority of electricity generation end-use of renewable resources other with nationally significant renewable resource values •Clarify the priority of the resulting policy provisions against Section 6 matters of national importance relevant to the effects of electricity generation activities. 		
		Policy 2	Conditional support	The Council seeks the following changes to Policy 2: That a requirement to always achieve a consistent standard of management of adverse effects arising from electricity generation from renewable sources, at all sites be inserted after the wording of Policy 2.	Oppose	The amendment is opposed as it would create an unachievable obligation.
		Policy 3	Oppose	The Council seeks that Policy 3 be deleted.		
		Policy 4	Oppose	The Council seeks that Policy 4 be deleted and that instead, a national environmental standard be developed to achieve the necessary guidance and		

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				standardisation for importing into plans by reference what the policy seeks.		
		Policy 5	Oppose	The Council seeks that Policy 5 be deleted and that instead a national environmental standard be developed to achieve the necessary guidance and standardisation for importing into plans by reference what the policy seeks, but subject to the evaluations identified in the text of this submission.		
79	Royal Forest & Bird Protection Society Inc.	General comments	Conditional support	<p>Forest and Bird, overall, supports the intention of an NPS, but believes that any undermining of the purpose and principles of the Act to protect other matters of importance is unsustainable.</p> <p>Expresses concern that many of the areas that are now being targeted for renewable electricity generation are either sited on important natural features, have high biodiversity values, or are within the conservation estate.</p> <p>Submits that against the 'biodiversity backdrop', the proposed NPS makes a number of statements and unquestioned assumptions of concern. Refer to pages 3-4 of the submission for examples.</p> <p>Generally supports the capacity for schemes to be able to continue to exercise consents, but does wish to see a reduced potential for the following issues to be addressed:</p>		

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				<ul style="list-style-type: none"> • Ability to seek and vary the conditions to improve habitat (e.g. ramping rates, fish passage, periods of operation); and • Ensure the efficient use of the resource. <p>In the opinion of Forest and Bird, the generation sector fails to engage appropriately with the community and stakeholder groups, frequently ignoring or overriding appropriate concerns.</p> <p>Submits that 'best practice' agreements could be developed on the following issues, e.g. Consultation; Biodiversity and natural features; Community involvement; Siting; Benefits accruing to a local community that may bear the brunt of the cost</p> <p>Submits that Central government has shown a lack of action in proactively providing for national networking in the establishment and management of renewable generation, leaving it to the vagaries of a competing market. Considers much more work could be done in this regard, which could be reflected through the NPS.</p>		
		Objective 1	Conditional support	<p>Forest and Bird supports the objective. However, submits that the information on which growth in demand is based needs to be questioned on a number of counts:</p> <ol style="list-style-type: none"> 1. Predictions for growth given current global economic recession 	Oppose	The effect of granting the submitter's relief is unclear.

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				<p>2.Limitations to growth in the physical environment, i.e. ensuring no decline in biodiversity</p> <p>3.Ensuring consistency with energy conservation directives as the first choice</p> <p>4. Consistency with other national policy directions, strategies, and plans</p> <p>5. Better integration of electricity generation</p> <p>6. Decoupling of electricity growth from economic growth</p> <p>7. Greater responsibility on primary industry to look at using waste/methane, etc streams as opportunities for generation.</p>		
		Policy 1	Conditional support	<p>Forest and Bird agrees that the provision of renewable electricity generation holds as nationally significant. Submits that it should not override other important nationally significant issues and it is also questionable whether all renewable electricity generation is nationally significant.</p> <p>Submits that the statement "These benefits may include, but are not limited to:" is too vague and is open to misinterpretation and is inappropriate for an NPS.</p> <p>Submits that the NPS must be careful not to override the purpose and principles of the RMA in its direction.</p>		
		Policy 2	Oppose	Forest and Bird is fundamentally		

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				<p>opposed to the direction of Policy 2 and believes it undermines the purpose of the RMA.</p> <p>Submits that these considerations are currently able to be considered within the RMA. Failure to avoid, remedy or mitigate will result in further losses to our biodiversity. It is wrong to assume that there can be no constraints to growth of electricity generation, whilst enabling legislation that would downgrade the value of an already declining biodiversity.</p>		
		Policy 3	Support	Forest and Bird supports Policy 3. It has been its experience that proposals for renewable electricity generation are not all created equal. Significant permanent environmental damage can be done from some projects, especially hydro dams, which cannot be rehabilitated.		
		Policy 4	Conditional support	Forest and Bird accepts the premise of Policy 4 with caution. Submits that it would be appropriate to include guidance on best practice principles for Councils to engage in this process. Has found that financial interests inevitably can override wider community interests because of lack of funding and legal support/understanding.		
		Policy 5	Conditional support	Forest and Bird supports community initiatives and distributed generation. Submits that this should not,		

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				<p>however, undermine the environmental integrity of the decision-making, but should principally relate to costs incurred through the process.</p> <p>Supports the retention of 4MW. Forest and Bird has been involved in a number of hearings recently regarding schemes slightly under 10MW and has been given evidence of the potential for significant negative environmental effects</p>		
80	Solar Action	General comments	Conditional support	<p>Solar Action supports the idea of the NPS. However, opposes the specific provisions as currently worded.</p> <p>Concerned that the NPS as currently worded will not deliver the desired outcomes.</p> <p>Is of the view that, while the underlying idea behind the NPS given in the preamble is laudable, the target, timing and assumptions are wrong. The target given is a percentage of generation, but a total fixed amount of generation is not set. Considers the time-frame is too long; major global energy restraints will impact on New Zealand well before the target date.</p> <p>Considers the NPS should acknowledge the existence of an upper limit for electricity generation, and either quantify it, or identify a process for doing so.</p>		

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				<p>Submits that the Preamble should acknowledge the finite limits to (particularly) physical growth.</p> <p>Agrees with the "Matter of National Significance statement", however submits that a defined 'cap' to electricity generation should be mentioned.</p>		
		Objective 1	Conditional support	Submits that there needs to be a specific, fixed, and quantified 'Energy Budget' limit to electricity generation.	Oppose	The submission appears to be inconsistent with New Zealand's future growth.
		Policy 1	Conditional support	Submits that the word 'increasing' should be removed from this policy.		
		Policy 2	Support	Generally agrees with the wording of policy 2.		
		Policy 3	Support	Agrees with policy 3.		
		Policy 4	Support	Agrees with Policy 4.		
		Policy 5	Support	Believes policy 5 is a key objective. As all renewable energy is of solar origin, the more on-site or local capture of energy that occurs, the better. Longer transmission paths lead to more losses.		