

Proposed National Policy Statement for Renewable Electricity Generation - Summary of Submissions

Submission Number	Name of Submitter	Wishes To Be Heard	Policies/Sections of NPS Submitted on	Position	Reasons for submission and amendments sought
1	Energy3 Limited	No	Policies 4 and 5	Conditional support	Supports Policies 4 and 5 but considers that the timeframe for implementation of these policies is too conservative. Seeks bringing the implementation timeframe of the policies forward to 13 March 2010. Refer to full submission for reasons for suggesting changes to accelerate the implementation of the policy.
2	NZ Petroleum Exploration and Production Association	Yes	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."
			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 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 councils and decision makers to favour renewable generation above all else, come what may. <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 fluctutations 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>			

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3	Adams, John	Yes	Policy 1	Support	<p>Is in full agreement with the words in Policy One.</p> <p>Considers it is an excellent example to illustrate the importance of diversifying the type and location of renewable generation activities are the Manawatu wind generation facilities. Refer to full submission for more information.</p>
			General comments	Not stated	<p>Submitter considers:</p> <ul style="list-style-type: none"> - Target driven development, i.e. 90% renewables by 2025, does not achieve the best result. - A moratorium is necessary on industrial scale wind facilities; - small scale community generation projects are a priority; - reasonable off-set distances need to be established to balance national benefit against loss of local amenity; - facts must drive policy; - industrial scale wind generation facility developers must be held accountable for lies/mis-information. <p>Refer to full submission for more details.</p>
4	WEL Networks Limited	No	Policy 1	Conditional support	<p>Supports Policy One, but seeks the following change to the proposal. Add a new benefit in Policy One wording as follows:</p> <p>iii Reducing energy losses and reducing investment requirements in the National Grid or the local electricity distribution network.</p>
5	Boorman, Julian	Yes	Policy 2	Not stated	<p>Concerned that the wording "consent authorities must have particular regard to the constraints imposed on achieving those measures" will tip the balance too far in favour of development at the expense of section 6 (c) indigenous vegetation and fauna. For example, the Mokihinui River should not be dammed to generate electricity.</p> <p>Proposes rewording Policy 2 to ensure significant indigenous vegetation and fauna are not sacrificed for renewable electricity generation.</p>
			Policy 3	Support	<p>In favour of policy 3 as it serves to guard against irreversible adverse environmental effects such as species extinction and river valley drowning.</p>
6	South Taranaki District Council	No	Policy 3	Not stated	<p>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."</p>
			Policies 4 and 5	Not stated	<p>Requests clarification if the term "enable." The Council seeks clarification as to whether it is intended to equate with Permitted Activity Status?</p>
7	Rodney District Council	Yes	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>

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			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 - Reduction in dependence on the national grid - Reduction in transmission losses - Reliability - Development benefits - Contribution to the renewable energy target.
			Policy 2	Support	<p>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.</p>
			Policy 3	Oppose	<p>Considers that Policy 3 should be deleted. Reasons include:</p> <p>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> <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	<p>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.</p>
			Policy 5	Support	<p>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.</p>
8	Adams, Rosemary	No	General comments	Not stated	<p>The submitter considers:</p> <ul style="list-style-type: none"> - a holistic view is required to achieve sensible development of renewables; - consent applications must be factual and consent conditions must be enforced; - with so many large turbines being proposed so close to many homes it is essential a more rigorous noise standard than NZS 6808 is applied. <p>Refer to full submission for more information.</p>

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9	North Shore City Council	Yes	General comments	Not stated	<p>North Shore City supports NPS in principle -</p> <p>"In our opinion however the NPS does not go on to deliver policy advice that will enable Councils to balance competing values in a nationally consistent way. It is debatable whether the NPS in its current form will add anything to the current guidance in S 7 of the RMA and the Energy Strategy other than by reinforcing the desirability of renewable electricity generation. More clarity is required if the NPS is going to provide a meaningful and cost effective contribution to future plans and consent deliberations. Without more clarity it is considered that the proposed NPS will not improve on the current provisions of the RMA (in particular S7 (i) and (j))."</p> <p>In respect of the timing of the amendment of the plans, this is slightly awkward for North Shore City Council as the authority is due to release its second generation plan before 28 June 2012. Although it has not been decided how to approach the review, it is probable that any requirements of the NPS will be addressed as part of that review, and it is likely that the date of 13 March 2012 will be a few months earlier than is ideal for North Shore City.</p> <p>However we note that there appear to be no sanctions for non compliance with the time limit, and waivers under section 37 are also possible with NPSs.</p> <p>The council notes that the NPS on Electricity Transmission provides direct advice as to how that NPS is to be applied by decision makers under the RMA, which is more detailed than the Explanatory note at the end of this NPS. In its opinion the provisions that set out some direction and assists in the interpretation of that NPS are useful. Perhaps similar direction would be useful in this NPS.</p>
			Objective	Not stated	<p>The objective contains a reference to 90% of electricity generation being generated from renewable sources by 2025. In the council's opinion this should be removed as it is inappropriate, for two reasons;</p> <ol style="list-style-type: none"> 1. It acts as a target which in our opinion adds undue weight to the decision making process. 2. The target is based on the New Zealand Energy Strategy which may be altered in the future. If this was to occur the NPS will need to be amended as well, generating unnecessary cost and bureaucracy.
			Policy 1	Not stated	<p>North Shore City question whether there is scope for some confusion between the national significance of renewable electricity generation and section 6 Matters of National Importance. "It is possible that the wording of Policy 1 may cause some decision makers to elevate Policy 1 to the status of a section 6 matter when the S 32 advises that it is not intended. As S6-8 of the Act operate in a loosely hierarchical nature, this will have implications for the outcome of decisions."</p> <p>In the council's opinion Policy 1 clarifies some of the benefits but does not provide guidance on the weight that should be afforded to them, over and above what is already provided for in sections 7(i) and (j) of the RMA.</p>
			Policy 2	Not stated	<p>The section 32 states that the policy 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.'</p> <p>North Shore City considers this interpretation is sensible. and "if this is not the intent there seems little point in having the policy."</p> <p>While there is no direct requirement to amend plans to implement the policies, we would expect that there will be pressure from generators to introduce policies that complement Policy 2.</p>
			Policy 3	Not stated	<p>North Shore City understands the reasoning behind Policy 3 but question whether it is necessary. "Whilst we think that potential reversibility is an important component of a project, reversibility and temporary effects are established concepts that are relatively well understood under the RMA. Except, for example, in the case of a nationally significant river that is subject to a hydro proposal, these effects will generally be local effects that decision makers are used to dealing with."</p>

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			Policy 4	Not stated	<p>Unsure whether this Policy is appropriate, and in the council's opinion both Part i and ii should be removed, or redrafted to make their intent clearer.</p> <p>Part i: "... this seems like a potentially large amount of work for potentially small benefits. A plan change to give effect to this will be resource intensive, with the only benefit to enable easier assessment by generators of possible renewable electricity opportunities. This appears to be a transfer of costs from the private sector to the public sector ... if our interpretation of this part is correct, it is not supported."</p> <p>Part ii: Unsure what 'enabling research scale investigation into emerging renewable electricity generation techniques and methods' actually means. It is unclear how District Plans can enable research scale investigation into emerging technology in any meaningful way.</p> <p>Suggests the Policy needs to be amended to read 'local authorities are to notify, where appropriate'. Considers that if there are no opportunities for generation, there is little point in making such changes.</p> <p>Considers the use of the word 'enable' could be problematic. Guidance as to the meaning of the word within the terms of the NPS would alleviate these concerns.</p>
			Policy 5	Not stated	<p>In respect to Policy 5 has similar comments as identified under Policy 4 above with respect to rules and methods, and the use of the term 'enable'.</p> <p>Considers it essential for MfE or some other body to provide an up to date repository of information concerning renewable electricity generation techniques and providers. This would assist in preparing rules and associated provisions, and makes more sense than 86 regional councils and territorial authorities each doing individual research on the topic.</p> <p>North Shore City does not provide for small scale renewable electricity generation activities in its District Plan. The District Plan review is planned for 2012 and it is expected that rules concerning solar panels, small wind turbines in rural areas, solar orientation and width of eaves will all be considered at that time.</p>
10	New Zealand Law Society	Yes	General comments	Not stated	<p>"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 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>

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			Policy 4	Not stated	Submits that Policy 4 does not require policy statements and plans to be 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 have 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."
11	Kapiti Coast District Council	Yes	General comments	Not stated	<p>Submits that a more comprehensive and more widely discussed NPS would be of value and would support an expansion of the scope of the NPS, and a longer and broader public discussion of these issues.</p> <p>Would support direction on the need for national, regional and local co-ordination to designate areas appropriate (and inappropriate) for renewable energy development National-level involvement is needed both to ensure proper resourcing of this process and consistency of outcomes.</p> <p>Guidance on balancing the benefits of renewable electricity development against other Part II matters under the RMA would be useful ... no guidance is actually provided on balancing benefits and impacts.</p> <p>There seems to be a mismatch between the problem outlined in the preamble and what the NPS delivers. There should be additional focus on small-scale and distributed generation at the household and business level.</p> <p>There must be appropriate national and regional support and collaboration if these policies are to be successfully delivered. The role of national government in resourcing and supporting should be made explicit.</p>
			Policy 1 - benefits	Conditional support	<p>Supports inclusion of the statement "The benefits of renewable electricity generation activities, at any scale, are of national significance." This statement is particularly important because it suggests that small projects will receive the same favourable consideration as larger ones.</p> <p>The second statement "Decision-makers must have particular regard to the national, regional, and local benefits relevant to renewable electricity generation activities" is redundant, as it essentially just restates S.7 of the RMA.</p> <p>Considers that the inclusion of a definition of the benefits of renewable energy is important, to avoid these having to be argued at every resource consent hearing. This would be particularly helpful for smaller projects. Although decisions from the Environment Court have now substantially documented the benefits of renewable energy, this clause will still have an impact in making hearings move more smoothly.</p> <p>A longer list of potential benefits would be helpful, including issues like: improvements to (or preservation of) local air quality; increased economic resilience by reducing dependence on fossil fuels which are subject to price shocks.</p>

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			Policy 2 - practical constraints	Not stated	<p>Has two significant concerns about Policy 2, particularly clause (ii).</p> <p>First concern is that this policy will lead to the applicants' views on what consent conditions are/aren't reasonable being given significantly more weight than at present ... as applicants would be seen as the experts on this issue. Its view is that consent authorities need to feel free to make their own decisions on what conditions are reasonable.</p> <p>Secondly, the phrase "must have particular regard to" elevates this consideration to be of equal importance to the benefits of renewable energy themselves (as outlined in Policy 1). This is a very high priority to be giving to technical constraints, and could be interpreted as overriding the need to avoid, remedy or mitigate in some circumstances. Considers that a lower priority for these issues would be more appropriate.</p> <p>Recent developments such as call-in provisions and Environment Court case law have made consenting easier for renewable energy developers. Questions whether policy 2 is necessary or appropriate.</p>
			Policy 3 - reversibility	Oppose	<p>Unsure as to the intent of Policy 3 and are uncomfortable with the concept of reversibility.</p> <p>Submits that although some renewable electricity options are fully reversible (such as installation of household solar panels or rooftop wind turbines), most large scale projects involve significant earthworks or construction with irreversible adverse effects. Considers that this policy could have the perverse outcome of counting against many large renewable electricity projects. Given the developing nature of renewable energy technologies, limiting the scale of development possible may hamper the investigation of new technologies, incentivising non-renewable sources.</p> <p>Concerned that this policy may cause confusion and prevent the objectives of the policy statement from being realised. At very least, "reversibility" needs to be clearly defined.</p>
			Policy 4 - identification and research	Conditional support	<p>Supports the intention of Policy 4, but have issues with the precise wording.</p> <p>Concerned by use of the term "enable", as its meaning is not clear and could imply that Council would actively encourage or promote these activities.... Suggest that it would be clearer to replace "enable" with "remove unnecessary barriers to" or a similar phrase.</p> <p>There is also no definition of "research-scale". This could be problematic, as it could mean anything from a single solar panel to large many-turbine wind farm. There is no guarantee that these activities will be low-impact. If special provisions exist for research facilities, this creates an incentive for all installations to be labelled as "research".</p>
			Policy 5 - small scale generation	Conditional support	<p>Supports the intention of Policy 5, but has issues with the precise wording.</p> <p>Considers that actual technologies and actual effects need to be considered in applications, and the assumption cannot be made that anything under 4MW is low-impact. Unsure why marine, offshore wind and tidal generation need to be excluded. All renewable generation should be encouraged as long as actual technologies and actual effects are considered.</p> <p>As in Policy 4, feels that "enable" could more accurately be replaced by "remove unnecessary barriers to". suggest that a new policy is added to specifically require provisions relating to household-level generation in planning processes.</p> <p>Suggests that a new policy is added to specifically require provisions relating to household-level generation in planning processes.</p>

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12	Waimakariri District Council	Yes	General comments	Oppose	<p>The Management of the Waimakariri District Council considers that a NPS for Renewable Electricity Generation is unnecessary, and requests that the government withdraw its Proposed NPS for Renewable Electricity Generation.</p> <p>In adopting this position, the council is mindful that the government amended the RMA to include S7 (j).... . This elevates the importance of renewable energy as a matter for consideration when making decisions under the Resource Management Act 1991, and the details of the proposed NPS, do not significantly clarify the situation as is suggested in the preamble to the proposed NPS.</p> <p>Wants the proposed NPS withdrawn.</p>
			Policy 4	Oppose	<p>If the government decides to progress with the NPS, the council do not consider that it is appropriate for the NPS to require changes to all district plans to include objectives, policies and where appropriate methods relating to renewable electricity generation.</p> <p>"Our opposition to Policies 4 and 5 relates to the nature of any proposal that is likely to come before a council for the establishment of a renewable energy generation complex, and the estimated costs associated with the implementation of the Proposed NPS by Councils.</p> <p>Seeks Deletion of Policy Four</p>
			Policy 5	Oppose	<p>Despite the inclusion of a definition of "small scale" as referring to a generation capacity of up to 4 megawatts, it is not easy to envisage the scale of activities that the NPS seeks to facilitate under Policy 5.</p> <p>It is also important to recognise that it is possible for the inclusion of provisions in Regional Policy Statements (RPS) dealing with renewable energy generation, because of the status accorded to this matter in the Act, and without the backing of a national policy statement. This means that irrespective of the scale of any proposal for renewable energy generation, support from the Act and RPS objectives and policies would mean that a plan change to authorise the establishment of a renewable energy generation plant could well face few barriers.</p> <p>Seek deletion of Policy Five</p>

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13	SPX Consultants	Yes	Policy 3 - reversibility	Conditional support	<p>Refer Attached Report on Reversibility of Renewable Developments prepared by SPX Consultants dated October 2008. 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 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
14	RES New Zealand Ltd	Yes	Other	Not stated	<p>"In RES' experience the requirement in the RMA for councils to have particular regard to the benefits of renewable energy (section 7(j)) has not been successful in encouraging the development of renewable energy projects or updating regional and district plans to reflect it."</p> <p>An NPS is regarded by RES as an important opportunity to help achieve the national benefits of renewable energy. The decision to prepare one is strongly supported."</p> <p>RES submission is that in light of the very clear policy directions set recently the proposed NPS is too weak and the policies insufficiently direct to have the desired effect under the RMA.</p> <p>See submission for further comments.</p>
			Objective 1	Support	<p>"RES considers that the objective has been well drafted, is clear and sets a target which the rest of the NPS should be subordinate to and designed to achieve. RES' concern is not with the Objective but the policies which have been proposed to try to achieve it".</p> <p>Retain the wording of this section and ensure that the subordinate policies are supportive of it and designed to achieve it.</p>
			Policy 1	Not stated	<p>"RES believes the policies as a whole fail to provide clear direction or set requirements for local authorities to achieve the objectives of the NPS..".</p> <p>Amend as necessary and incorporate the intent of Policy One into a more comprehensive, targeted and cohesive set of policies designed to achieve the Objective of the NPS. Specific wording provided in section five of the submission.</p>

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			Policy 2	Not stated	<p>Considers as one of the few core policies, Policy 2 is far too narrow and particular to have the impact needed to promote the development and operation of renewable generation activities. The intent behind Policy 2 needs to be incorporated into a much wider and more comprehensive suite of policies designed to achieve the objective of the policy change.</p> <p>Amend and incorporate more comprehensive, targeted and cohesive policies (see specific wording suggestions in section 5 of the submission)</p>
			Policy 3	Not stated	<p>Considers Policy Three is potentially helpful for windfarm projects in particular. Needs to be incorporated into a much wider and comprehensive policy statement designed to achieve this. (see wording suggestions in Section 5 of the submission)</p>
			Policy 4	Not stated	<p>Considers Policy four is far too narrow and the actions required too slow to make the sort of changes needed to meet the objectives of the NPS .. "because it doesn't require any action until 2012, far too slow to be able to make a difference to these problems.</p> <p>In RES experience the issues related to the development of new renewable energy projects have little to do with either the identification and assesment by generators of potential sites (policy 4(i)) or constraints on the ability to undertake research (policy 4(2)). With respect to wind generation in particular the industry already has good information about sites of interest to it and proven it is in a position to carry our commercial and nationally significant windfarm development immediately. Obtaining resource consents for those projects and ensuring that they are considered under the appropriate RMA framework is the priority. Policy 4 fails to achieve this.</p> <p>Amend as necessary - specific wording provided in section 5 of the submission.</p>
			Policy 5	Oppose	<p>Considers Policy Five ... is unlikely to provide significant help in achieving the objects of the NPS.... while the intention to encourage small scale generation is supported by RES, inclusion of this policy is likely to carry undue weight within the NPS and distract from the overall thrust. It should be incorporated in a separate NPS and addressed as a separate issue.</p> <p>Deletion of policy five sought and address it as a separate NPS.</p>
15	Taranaki Regional Council	No	Other	Not stated	<p>Taranaki Regional Council (TRC) questions the need for the NPS. "The Council has had considerable experience in processing consents for renewable energy activities (such as renewing consents for hydro schemes) and has found that through using existing tools and practices, those consents have been processed effectively and efficiently".</p> <p>The TRC has already recongised the importance of renewable energy through the proposed Regional Policy Statement for Taranaki and examples of the provisions are given in para 7 of the submission.</p> <p>Considers the NPS should not unrealistically fetter local decision making. ... The Council is concerned that the NPS may be used to over-ride local decision-making....</p>
			Policy 1	Not stated	<p>Considers that Policy One of the NPS could mean that consents could be granted for a hyro-power use of water, overriding the community water requirements... Is this really the desired policy outcome? If not then the Policy needs to be qualified."</p> <p>"Furthermore, a potential unintended policy implication of the NPS is that the renewable electricity generation use of resources will over-ride all other aspects, even those that may be nationally important for other values such as for recreation, water supply and natural values. "</p>

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			Policy 2	Not stated	<p>Considers that Policy 2 could be used by generators to argue that they need not put in measures to avoid, remedy or mitigate adverse environmental effects because of logistical constraints. Such an outcome is strongly opposed.</p> <p>Recommends an additional policy that looks at the opportunities (compared with the constraints) of measures to avoid, remedy or mitigate adverse effects." Wording of an additional policy is provided.</p>
			Policy 4	Not stated	<p>In relation to Policy 4 and 5, the Council is concerned that there is no clear definition of "enabled".</p> <p>The Council supports the fact that Policy 4 does not direct local authorities to identify potential sites for renewable energy generation, but merely seeks to facilitate generators to identify and assess potential sites or energy sources..... it is unclear just what sorts of activities Policy 4 is designed to facilitate.</p> <p>There is potential for Policy 4 and 5 to conflict with the recently proposed National Environmental Standard for Ecological Flows.... This is of particular concern for this Council given the large number of small streams and rivers on the ring plain in the region.</p> <p>While the Council supports the inclusion of a common date in these policies with the Electricity Transmission NPS to reduce plan process costs, it is also submitted that Policies 4 and 5 should be qualified to apply only to plans and policy statements that do not already enable such activities to save councils the high cost of notifying plan changes unnecessarily.</p>
16	Nelson Canoe Club	No	Other	Not applicable	Believes that a NPS for recreational use of rivers should be developed at the same time as this NPS. The reason is that existing, ratified NPS's will take precedence over NPSs that have not been developed and therefore our recreational values will not be upheld as they should.
			Policy 1	Not stated	Believes that electricity generation benefits of national significance should not take precedence when a resource of national (and sometimes international) significance for recreation is at stake. If hydro-electric power (HEP) plants cause such adverse effects, then an alternative method of renewable electricity generation should be used (eg wind or solar since both are reversible).
			Policy 3	Support	<p>Totally supports the concept of reversibility associated with particular generation types.... reversibility needs to be defined and could be defined as the cost of restoring the resource to the original condition.</p> <p>End-of-dam-life plans should be produced in all dam developments (as is the case for mining activities). Bonds should be provided, enough to cover the removal of the dam and all adverse effects.</p>
			Policy 4	Oppose	<p>Doesn't think that local authorities should be involved in identification of renewable generation possibilities for the following reasons :</p> <ul style="list-style-type: none"> - they have neither the expertise, corporate knowledge or the capacity to do this, whereas the power companies have all this and it would create unnecessary duplication to provide this (with an impact on rates) - it is the TLA's important job is to determine whether the adverse effects on the environment are more or less than minor and to investigate and propose resource trade offs, assuming conflicting values exist at a site. To put the TLA in a position of developing electricity generation produces a conflict of interest.
			Policy 5 - small scale generation	Not stated	Submits that the assumption appears to be that a larger number of smaller sites on higher order waterways, is a supply opportunity not addressed. All scales of hydro sites will pose risks of adverse effects on other water body values (eg. conservation land, headwater spawning vs landscape and instream sports and recreation).

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17	Stichbury, Paul	No	Other	Not stated	<p>Submits that "it is easy to make a general observation as to the desirability of developing alternative energy sources but if it results in the destruction and alienation of communities and the environment, then that is a very poor outcome, which in turn reflects badly on the alternative energy sector."</p> <p>Submission includes an attachmentwebsite (www.palmerston-north.info)</p> <p>"Trust that the concerns raised here are taken on board in a way that sets clear guidelines for future policy making so that communities have certainty and that projects are not pursued with an implementation at any cost strategy. "</p>
18	Gisborne District Council	No	Other	Oppose	<p>Gisborne District Council does not support the proposed NPS unless it offers useful guidance to decision-makers.</p> <p>Implores the Board to consider the implementation burden that will fall on local authorities and requests that central government releases funds and resources to support the implementation of the NPSREG.</p> <p>Council questions the usefulness of the proposed NPS. There is a lack of clarity in how to use the NPS to guide decision-making. It has the potential to be meaningless as it adds little beyond section 7(j) of the RMA and does little to promote a "nationally consistent framework".</p> <p>Specific guidance is required on</p> <ul style="list-style-type: none"> - specific sites and locations of national importance for recreational, cultural, environmental reasons that would not be appropriate for the development of renewable electricity generation - i.e Exclusion Zones. It is central government's role to identify these areas of national significance. - balancing matters of national importance in section 7 of the RMA and balancing matters of national significance identified in the burgeoning number of national policy statements.
			Policy 3 - reversibility	Not stated	<p>Minimum environmental bottom lines requested .. comparing the relative effects of technologies and selecting the most permanently benign will not necessarily result in good environmental outcomes.</p> <p>Suggests amendment to Policy 3 to strike out the word "relative".</p>
19	Mainpower	Yes	Other	Not stated	<p>MainPower supports the NPS in principle, however it is concerned that it is not unequivocal in its support of renewable energy in its present form.</p> <p>Parts of the NPS, for example policy 3 and some of the comments in the preamble appear overly concerned with adverse environmental effects associated with renewable energy projects. These provisions may be relied on by opponents of renewable energy projects to argue that a project should not proceed.</p> <p>MainPower is of the view that concerns about the environmental effects of renewable energy should not be reflected in a NPS to support renewable energy.</p> <p>MainPower is of the view that there needs to be greater urgency in New Zealand's efforts to address climate change. One of the Governments key objectives in tackling climate change states that 90% of New Zealand's energy should come from renewable energy sources by 2025. It is MainPower's view that the NPS in its present form will not achieve this goal.</p> <p>Considers the NPS needs to be strengthened to ensure that this objective is achieved.</p>
			Policy 1	Support	MainPower supports Policy One.

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			Policy 2	Conditional support	Considers the wording of Policy 2 is unclear. MainPower understands that the intention of the policy is to recognise that developers of renewable energy projects often face constraints for example location of the energy source, location of existing renewable activities, location of infrastructure. These constraints can limit the ability of a developer to avoid, remedy or mitigate any adverse environmental effects associated with a renewable energy project. The policy needs to be amended to make its purpose clearer.
			Policy 3	Oppose	MainPower opposes the inclusion of a policy requiring decision makers to have particular regard to the reversibility of the adverse environmental effects associated with proposed generation technologies. Submits that the inclusion of this policy will seriously hinder the development of certain types of renewable generation for example some forms of hydro generation. Policy 3 should be deleted.
			Policies 4 and 5	Conditional support	MainPower supports policies 4 and 5 but questions why the timeframe needs to be so long. The present timeframe does not reflect the urgency required to ensure that New Zealand meets the stated goal of achieving 90% of fuel generated from renewable sources by 2025. It is MainPower's view that renewable energy opportunities could be identified relatively quickly within a region or district. Considers that the timeframe for notifying amendments to policy statements and plans should be reduced so that the greatest number of potential renewable energy projects obtain the benefit of the provisions. Recommends amending policies 4 and 5 by changing the deadline to a date in 2010.
			Policy 5	Conditional support	MainPower supports the intention of the policy but questions whether support should only be limited to small and community scale generation. There is also no explanation as to why the definition of small and community scale renewable generation is limited to projects with an installed generation capacity of less than 4 MWs.
20	Frost, Stephen	No	Other	Not stated	Considers that... the flavour of the draft NPS appears to favour the applicants for renewable energy projects. Submitter has concerns about how the RMA is applied in terms of wind farm applications. These include : <ul style="list-style-type: none"> - When large power companies apply for wind farm consents under the RMA, opposing local parties are severely disadvantaged. - Opposing locals have to prove loss of amenity and other values to limit proposals and this is extremely difficult on what amounts to value judgements. - Wind farm applicants pay experts to cast evidence in favour of wind farms. Such experts are affected parties in that they are paid to provide evidence in the applicant's favour, which is often a value judgement - If experts make claims that do not hold up in reality the mechanisms to gain enforcement of conditions are weak. These experts and the applicant are not held responsible. - No dollar value can be put on loss of amenity in the weighing up of decisions, nor is there a prescribed way to handle section 5(2) in the RMA. Other concerns are outlined in submission - refer to submission for details.

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21	Conning, Linda	Yes	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 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> <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 consents for small-scale trials.</p>
22	Pioneer Generation Ltd	Yes	General comments	Not stated	<p>Pioneer supports the vision and objective of the NPS in principle. Pioneer is primarily concerned that the proposed NPS will significantly restrict hydroelectricity generation development and enhancement projects (when consenting/reconsenting) in New Zealand.</p> <p>The proposed NPS may also create additional impediments to the reconsenting and / or development, expansion, or enhancement of Pioneer's existing hydroelectric power generation assets.</p>

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			Objective	Support	<p>Pioneer supports the objective of the proposed NPS, as it, together with appropriate policies, assist in achieving the New Zealand Energy Strategy's target that 90 percent of New Zealand's electricity demand be sourced from renewable electricity by 2025.</p> <p>Pioneer requests that the objective be retained unmodified.</p>
			Policy 1	Conditional support	<p>Pioneer considers that Policy One could be strengthened by increasing or further clarifying the list of benefits associated with renewable electricity generation.</p> <p>See submission for suggested amendments to Policy One.</p>
			Policy 2	Conditional support	<p>Pioneer agrees that renewable electricity generation projects are often constrained by location of energy source; existing structures and infrastructure; logistical and technological constraints, together with project design constraints. However securing access to land is also key to the development of renewable electricity generation. The proposed NPS should be extended to provide direction to the removal of barriers of access to land, particularly with respect to conservation land.</p> <p>See submission for suggested amendments to Policy Two.</p>
			Policy 3	Oppose	<p>Pioneer Generation 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 consenting of existing hydroelectric power generation schemes.</p> <p>It is further considered that policy three amplifies investment/cost by making it more difficult to argue for and ultimately obtain viable resource consents for hydroelectric power generation proposals.</p>
			Policy 4	Not stated	<p>While understanding the logic behind the development of Policy Four, Pioneer questions its workability and pragmatism.</p> <p>In effect Policy Four appears to envisage that local government should promote the identification of possible sites for development. Unless carefully implemented, this will lead to preference being established for existing proposals..... Pioneer 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>See submission for wording changes suggested to policy four.</p>
			Policy 5	Conditional support	<p>Supports the intention of Policy Five.</p> <p>The definition of "small and community scale electricity generation" as being projects that have an installed electricity generation capacity of less than four megawatts is unnecessarily restrictive. ... it is difficult to understand the environmental rationale for the establishment of the 4MW threshold.</p> <p>.... these policies do not specifically require local authorities to recognise the national significance of all (new and existing) renewable electricity generation proposals. This is inappropriate and something that needs to be addressed.</p> <p>See submission for suggested amendments to Policy Five</p>
			New Policy	Not applicable	<p>Recommends an additional Policy Six which requires decision makers, when considering proposals to consent and/or enhance existing renewable electricity generation activities, to have particular regard to the benefits of existing generation capacity and the existing environment.</p> <p>See submission for proposed wording.</p>

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23	King Country Energy Ltd	Yes	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.
			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.
			Policy 4	Not stated	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. Amendments to Policy Four suggested - refer to submission for details.
			Policy 5	Not stated	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. Amendments to Policy Five are suggested to provide for a 10 MW threshold. 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.
			New Policy	Not applicable	While the proposed NPS goes some way to promote the benefits of renewable electricity generation it should be extended to specifically include statements regarding existing renewable electricity generation infrastructure and the re consenting and/or enhancing of the same. A new Policy Six is suggested that requires decision makers, when considering proposals to re 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. Refer to submission for wording.

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24	Henderson, Chris	Yes	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 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	<p>Considers policy 2 to be inappropriate as it is not conducive to good decision making and should be rejected.</p>
			Policy 3	Not stated	<p>This has very limited positive potential unless generators are required to pay a bond upfront for the de-commissioning of all structures associated with new industrial wind or hydro generation.</p>
			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 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>

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25	Kensington Swan	No	General comments	Oppose	<p>Kensington Swan opposes the proposal in its current form as it is in its opinion that s7(j) of the the RMA makes much of the proposal unnecessary. The proposal also does not achieve its aim of promoting consistent decision making from local authorities, and hence its overall objective, as the guidance lacks clarity. The aims and objective of the proposal would be better served by drafting a national policy statement which gave specific guidance to s 7(j) of the RMA.</p> <p>It would be extremely helpful to the decision making process if the local authorities were provided with some clear guidance as what 'particular regard' means by indicating the threshold level of this test and what matters it requires local authorities to consider.</p> <p>The definition of "relative degree of reversibility" should be changed to read "'relative degree of reversibility' means adverse effects which can be either fully or substantially reversed within a reasonable time of the occurrence of each adverse effect.</p> <p>Suggestions also made for a change to the definition of "renewable electricity generation".</p>
			Policy 1	Not stated	Policy 1 simply reiterates s 7(j) of the RMA by emphasising the national significance of renewable electricity generation.
			Policy 2	Not stated	If the purpose of policy 2 is to signal that local authorities do not have to be so strict in avoiding, mitigating or remedying any adverse environmental effects, then Policy 2 should specify this clearly.
			Policy 3	Not stated	<p>Policy 3 requires the local authorities to have regard to the relative degree of reversibility of any adverse effects associated with the generation of renewable electricity. "Relative degree of reversibility" is a very broad term. Such a term enables a high degree of discretion and judgement in the decision making process.</p> <p>Further guidance needs to be provided on this term, including, the threshold standard for "relative degree".</p>
			Policy 5	Not stated	<p>Considers the costs of implementing the proposal on local government.</p> <p>"There is nothing to prevent local authorities from passing on the costs of implementing the proposal to the consent applicants. This will not result in the removal of the regulatory barriers and may only increase them. "</p> <p>If this proposal is to be approved then we submit that it should be accompanied by funding from the government to ensure its immediate and smooth implementation.</p>
26	Northpower Ltd	No	General comments	Not stated	<p>In principle, Northpower Ltd supports the intention of the proposed NPS.</p> <p>Although this document sets a clear preference for renewable generation, it does not place a strong focus on energy distribution and delivery. The two activities go hand in hand and must both be strongly supported to ensure continued secure energy supplies to New Zealand consumers.</p>
			Objective 1	Not stated	<p>This objective, although commendable was unclear about exactly how much generation is required. Electricity delivered by hydrological generation is dependant on factors which are often constrained. 90% is too broad a definition, it creates uncertainty regarding just how much generation is required.</p> <p>Northpower recommends that the target be redefined for this document and expressed in terms of demand. A target expressed in terms of required demand will better assist development of generation to meet actual needs.</p>
			Policy 1	Conditional support	In principle Northpower agrees with this policy. The list of benefits could (and should) be expanded. New Zealand's commitment to environmental protection and commitment to support and protect international initiatives could be included in this policy.

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			Policy 2 - practical constraints	Not stated	<p>.... a strategic requirement should be introduced to ensure relevant authorities communicate and consider related applications together.</p> <p>To ensure that supporting systems are able to promote renewable generation, planning and decisions may be required between territorial authorities or between different sectors of the electricity business. Northpower recommends provision of further guidance regarding how this strategic planning should occur. Processing of applications of this nature at a Regional level provide some benefit.</p>
			Policy 3	Conditional support	<p>Northpower agrees that reversibility and impact on the environment should be considered. However, reversibility is not well defined and could lead to uncertainty amongst applications which are less reversible than others. Without concept definition and further guidance on how to apply this policy, inconsistent decision making between renewable generation types could result and prevent some projects proceeding. Northpower respectfully requests that this policy be reviewed to define reversibility to further support consistency between decisions.</p>
			Policy 5	Not stated	<p>If renewable electricity generation is a formal priority for New Zealand, then all scales and all initiatives should be encouraged. Current wording of the policy may limit this. If a community initiative can support more than 4 megawatts of generation this should not be discouraged by national policy. If the small and community scale distributed renewable energy requirement electricity generation consideration is retained in this policy then the definition should be consistent with other legislation, rules and requirements.</p>
27	Ngati Kahungunu Iwi Incorporated	Yes	Other	Not stated	<p>Submits that the Ministry and the Board of Inquiry must recognise that an element of caution needs to be adopted to ensure that the raising of the priority level for renewable electricity generation does not displace other values that are inherent within existing resource management constructs.</p> <p>Ngati Kahungunu Iwi Incorporated's interests in the proposed NPS relate mainly to: -</p> <ul style="list-style-type: none"> - The lack of a robust consultation process - The narrow scope of the proposed NPS - Section 32 analysis report - The single proposed objective - Imposition of the new NPS on our constituents - Potential adverse effects on: Outstanding natural features; Iconic landscapes; The marine environment; Fresh water environments - No acknowledgement, recognition or provision for Kahungunu interests - Adaptive management and climate change - Flora and fauna
			Objective	Not stated	<p>As proposed, the objective allows for a substantial degree of leeway in enabling renewable electricity generation, while sacrificing sound environmental management principles. In our view, it is not the most appropriate way for promoting sustainable management for renewable electricity.</p> <p>Local government as a branch of central government, enacting legislation approved by central government, must also adhere to Treaty guarantees and responsibilities. Nowhere within the proposed NPS is it signaled that Treaty matters will be given due weighting within decision-making processes....</p> <p>Asks that an additional objective be added to the NPS with reference to the principles of the Treaty of Waitangi, the protection of tangata whenua values and customary practices, and for new policies relevant to achieving this (new) objective.</p>

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			New Policy	Not applicable	<p>Seeks the addition of policies to:</p> <ul style="list-style-type: none"> - specifically prevent the degradation of these features and landscapes due to maintenance, development or expansion of renewable electricity generation facilities." - enable significant adverse effects of hydro-electricity generation on customary practices and historic heritage sites and values, to be avoided, remedied or mitigated. Higher-level controls are required to guide resolution of resource consent issues affecting these taonga." - prevent significant adverse effects on marine ecology and on the relationships of tangata whenua with coastal resources." - aid the protection of indigenous biodiversity." - require robust assessments of the environmental effects of all activities related to renewable electricity generation including new technologies".
28	Waikato District Council	No	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 possible inability to adequately avoid, remedy or mitigate any adverse environmental effects.</p>
			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	<p>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.</p> <p>Council recommends retaining Policy 2 and seeks additional guidance material on how to assess constraints.</p>
			Policy 3	Conditional support	<p>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.</p> <p>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'.</p>
			Policy 4	Conditional support	<p>The council supports Policy Four but 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>
29	Clearwater Hydro Ltd	No	Other	Support	<p>Clearwater Hydro Limited supports the proposed NPS - the objective and all the policies - "as they send a strong message to the public and consent authorities regarding the significance of renewable electricity generation."</p> <p>No changes sought.</p>

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			Policy 5	Support	Especially pleased to see the inclusion of Policy 5, which acknowledges the important role that small scale projects have to play in helping meet New Zealand's future energy demands.
30	Porirua City Council	Yes	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 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>
			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 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.

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31	Environment Canterbury	Yes	General comments	Not stated	<p>Environment Canterbury does not believe that the NPS is the most appropriate means of achieving a specified target of electricity generation for renewable resources and submits that the NPS does not add useful guidance over and above the status quo. Is particularly concerned that policy intervention at the NPS level will carry significant implementation costs to local government. Submits that the hierarchy between sections 5, 6 and 7, and how to consider s7 matters has already been effectively addressed by the Court under the existing RMA framework and as such, an NPS addressing this issue is not necessary. Considers that this guidance would be more appropriate if in the form of non-statutory guidance notes.</p> <p>Recommends that the Board of Inquiry withdraw the NPS in its entirety and recommend to the Minister that within the RMA framework, the strategic 90% target can be more effectively and efficiently achieved by retaining the status quo.</p> <p>Should the NPS proceed, amendments and additional policies suggested.</p>
			Objective	Oppose	<p>Environment Canterbury submits that the Objective is currently inappropriate because:</p> <ul style="list-style-type: none"> - It does not achieve the purpose of the Act; - It can not be achieved through RMA intervention alone; and - It will not necessarily result in a reduction in greenhouse gas emissions. <p>Environment Canterbury submit that should the Board of Inquiry choose to continue with the NPS, the Objective should be revised so that it is not aligned with the 90% target.</p>
			Policy 1	Oppose	<p>Environment Canterbury agree that cumulatively, small scale generation is of national significance and submit that the policy (should it be retained) should explicitly state that cumulatively, small scale generation is of national significance.</p> <p>This policy provides examples of benefits that could be derived from the use and development of renewable energy, but does not provide anything further in the way of explanation as to how decision makers should be balancing these benefits, particularly against Section 6 matters of national importance. Overall, it is submitted that this provision is ineffective and does not provide any additional value than is already achieved by the status quo.</p> <p>Environment Canterbury submits that Policy 1 should be deleted from the NPS ... Should the Board of Inquiry choose to retain Policy 1, an alternative policy should be developed that provides guidance on weighting of Section 6 matters against Section 7 matters. A suggested alternative follows: "Where a renewable electricity generation activity is proposed that can be shown to have nationally significant benefits but will significantly adversely affect a matter of national importance, preference will be given to the protection of the matter of national importance."</p>
			Policy 2	Conditional support	<p>Environment Canterbury supports this policy but asks for additional guidance on how it is intended that this policy is to be implemented.</p>

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			Policy 3	Oppose	<p>Supported in principle but has concerns regarding interpretation and potential consequences of this policy.</p> <p>As it is currently written this policy has the potential to set a precedent regarding the relative reversibility of all activities (not just renewable generation activities). The potential consequence of this is that adverse effects of many activities (e.g. a dwelling in an outstanding landscape, creating a large impervious surface, extracting water volumes exceeding minimum environmental flows) could be assessed as being reversible and therefore acceptable.</p> <p>Environment Canterbury requests that Policy 3 is deleted. It is suggested that the intent of Policy 3 may be better achieved with the introduction of National Environmental Standards that are technology specific (i.e. apply individually to wind generation, tidal generation etc), and where there are truly reversible effects to be considered, the generation facilities can be given a maximum life span, with provision for bonding requirements to ensure effects are reversed.</p>
			Policy 4	Not stated	<p>While supportive of the intent of Policy 4, it is not clear that such a policy is actually required at NPS level.</p> <p>If Policy 4 is to be retained, it is suggested that to ensure this policy can be implemented consistently, definitions should be developed for “research-scale investigation” and “emerging technologies”. Suggested definitions follow:</p> <p>“Research-scale investigation” means research and development activities that are of a scale where the adverse effects of those activities on the environment are less than minor.</p> <p>“Emerging technologies” include technologies for the generation of electricity from renewable sources that have not been previously tested in the local area, have a significant point of difference to technologies that are in common use, and have significant potential to increase the nation’s electricity generation capacity.</p> <p>Overall, it is suggested that Policy 4 could be more effectively achieved through the introduction of National Environmental Standards which can set an activity status for specific activities.</p>
			Policy 5	Support	<p>Policy 5 is supported by Environment Canterbury. Environment Canterbury commends MfE for this policy and suggests that Policy 5 is given more prominence within the NPS.</p> <p>It is considered however that Policy 5 could be constrained by the current definition of “small and community-scale distributed renewable electricity generation”. ... A suggested alternative definition follows:</p> <p>“Small and community-scale distributed renewable electricity generation” means electricity generation from a renewable source, for the purpose of supplying electricity to a particular site or an immediate community via local transmission lines, and where the adverse effects of the generation activity are minor or less than minor.</p>
32	Tauranga City Council	No	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>

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			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 suggests amended wording for the Objective - refer to submission for details.
			Policy 1	Conditional support	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. That the use of the term 'must' be replaced with the term 'shall.'
			Policy 2	Oppose	TCC sees that this policy is in fact contrary to the RMA with its underlying premise to manage adverse effects on the environment. 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.
			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. 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. TCC does not support this Policy and seeks for it to be removed.
			Policy 5	Oppose	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. The use of the term enable is also required to be defined. Policy is open to interpretation and further clarification is required. Technical assistance to councils required. TCC does not support this policy and seeks for it to be removed.
			New Policy	Not applicable	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 existing sensitive activities including urban areas."

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33	Genesis Energy	Yes	General comments	Not applicable	<p>The NPS should achieve consistency with other Government policy initiatives. In particular, the Proposed NPS for Freshwater Management and the Proposed NES on Ecological Flows and Water Levels. Any inconsistency would lead to uncertainty and undermine the objective of the NPS. (See Appendix 1 paragraphs 1 to 5.)</p> <p>Genesis Energy considers that an NES is a regulatory tool to implement policy. As such, the Proposed NES Ecological Flows and Water Levels should not be finalised prior to the finalisation of the policies set out in this NPS. If such an approach is not adopted, there is a risk that the Proposed NES Ecological Flows and Water Levels will be inconsistent with the NPS. In turn this would result in regulatory uncertainty that may undermine the objective of the NPS.</p> <p>Irrespective of the timing and final content of any NPS, the Minister should release the specific wording of any NPS for review prior to Gazettal of the NPS. This would assist in mitigating any risk of drafting errors that might have the effect of undermining the NPS.</p> <p>The NPS should require amendments to policy statements and plans to recognise the benefits of renewable electricity generation. This is necessary to provide a firm foundation for rules which promote renewable electricity generation and to ensure decision-makers give effect to the NPS. However, recognition of such benefits does not require a concomitant need to disregard the benefits of other forms of electricity generation. (See Appendix 1 paragraphs 21- 22.)</p>
			Policy 1	Conditional support	<p>The Proposed NPS should recognise further benefits in addition to those specified in Policy 1, including those identified by the Ministry of Economic Development's Electricity Generation Reference Group and the Courts. Unless all benefits are identified in Policy 1, there is a risk decision-makers will fail to have particular regard or give appropriate weight to those benefits not identified in Policy 1. (See Appendix 1 paragraphs 6 to 11.)</p>
			Policy 3	Oppose	<p>The Proposed NPS should require decision-makers to have regard to the benefits of reversibility of adverse effects of renewable electricity generation, but not penalise renewable proposals in the absence of such reversibility. Therefore, Policy 3 should be deleted and an additional benefit that reflects Policy 3 should be included in Policy 1. (See Appendix 1 paragraphs 12 to 20.)</p>
			New Policy	Not applicable	<p>The NPS should include a new policy protecting new and existing renewable electricity generation activities from reverse sensitivity effects. Such a policy would ensure full utilisation of existing renewable electricity generation facilities, delaying the need for additional electricity generation plant. It would also protect new facilities, maximising the benefits identified in Policy 1. (See Appendix 1 paragraphs 23 to 25.)</p>
34	Nelson/Tasman Branch of the Royal Forest and Bird Protection Society	Yes	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>

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			General comments	Conditional support	<p>Submitter seeks the following changes :</p> <p>The addition of the words "biodiversity-friendly" before the words "renewable electricity generation" as a matter of national significance;</p> <p>Recognising the importance of environmental protection in the 'Objective';</p> <p>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.</p>
35	Rangitata Diversion Race Management Ltd	Yes	General comments	Not stated	<p>Supports the vision and objective of the proposed NPS, however, is concerned that, as currently drafted, the proposed NPS will unnecessarily restrict hydroelectricity generation development and enhancement projects in New Zealand.</p> <p>Considers that the NPS may also create additional impediments to the consenting and / or development, expansion or enhancement of existing hydroelectric power generation assets.</p> <p>Changes to existing policies suggested and an additional policy suggested regarding existing renewable electricity generation infrastructure and the consenting and / or enhancing of the same.</p>
			Objective 1	Conditional support	<p>Submitter seeks "that the proposed objective be further strengthened to promote 'enhancement' as well as the development, upgrading, maintenance and operation of the new and existing renewable electricity generation activities."</p> <p>Wording of a revised objective provided.</p>
			Policy 1	Conditional support	<p>While supportive of policy 1, considers that this policy could be strengthened by increasing or further clarifying the list of benefits associated with renewable electricity generation.</p> <p>Revised wording for Policy One suggested.</p>
			Policy 2	Conditional support	<p>The proposed NPS should be extended to provide direction to the removal of barriers of access to land, particularly with respect to conservation land.</p> <p>Proposed rewording of Policy Two suggested.</p>
			Policy 3	Oppose	<p>Considers that Policy Three should be deleted in its entirety.</p> <p>This policy is not consistent with the vision and objective of the proposed NPS as it will unnecessarily, and without justification, restrict new hydroelectric power development proposals, and enhancement and consenting of existing hydroelectric power generation schemes.</p>
			Policy 4	Not stated	<p>While understanding the logic behind the development of Policy Four, questions its workability and pragmatism.</p> <p>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.</p>

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			Policy 5	Not stated	<p>The 4 MW threshold is seen as unnecessarily restrictive and not consistent with that promoted by the electricity market, where generation infrastructure that has a capacity of less than 10 megawatts is considered small.</p> <p>Amended wording suggested.</p> <p>These policies do not specifically require local authorities to recognise the national significance of all (new and existing) renewable electricity generation proposals. This is inappropriate and something that needs to be addressed...</p> <p>Amended wording suggested.</p>
36	Wellington City Council	Yes	General comments	Not stated	<p>Despite strong support of the intent, there are aspects of the proposed NPS that are difficult to interpret and require more clarification and detail. It is unclear whether the proposed NPS will provide improved practical guidance to the Council for assessing resource consents for renewable electricity generation. For example, the proposed NPS does not provide specific guidance to the Council and other consent authorities on how much positive "weight" to give consent applications for renewable electricity generation projects.</p> <p>The Council finalised District Plan Change 32 ('Plan Change 32') in 2005 as a response to the RMA Amendment Act 2004 requiring councils to have particular regard to the benefits of renewable energy....The Council believes that Plan Change 32 sufficiently covers the general intent of policies 1-4i from the proposed NPS. The Council is seeking confirmation from either the Board of Inquiry and/or the Ministry for the Environment that wording of Plan Change 32 is consistent with the objectives and policies of the proposed NPS.</p>
			Objective 1	Conditional support	<p>The Council is generally supportive of the objective of the proposed NPS. The Council believes it is also important to reference the real objective for developing the proposed NPS on renewable electricity: to reduce greenhouse gas emissions from New Zealand's electricity generation while maintaining security of supply. There is little purpose in having a 90% renewable energy target in and of itself if it does not lead to other benefits.</p>
			Policy 1	Conditional support	<p>In order to provide the most detailed guidance to consenting authorities, the Council believes that policy 1 should provide greater detail regarding the benefits of renewable electricity generation activities. Other benefits (as noted in the proposed NPS evaluation) include:</p> <ul style="list-style-type: none"> - least-cost approach to reducing greenhouse gas emissions - reduces dependence on fossil-fuel generation to minimise exposure to oil and gas prices - provides generators with more certainty that decision-makers will give appropriate considerations to the benefits of renewable electricity generation - increases in national generation capacity -investments in human capital for renewable generation sector -reduces costs of meeting international emissions commitments. <p>If it is the Government's will to recognise the benefits then it is important to articulate these benefits in a detailed manner.</p>

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			Policy 2	Conditional support	<p>The explanation of the policy provides clarity that policy 2 in “no way undermines the protective emphasis of section 6 and applicants will still need to establish that any proposal promotes the purpose of the RMA”. Furthermore, the explanation note states that the policy “...would likely place an onus on the project proponents to show that options and technologies for addressing adverse effects had been adequately considered.” These points are not properly reflected in the actual policy and there is room for misinterpretation from decision-makers and applicants. The Council believes more explanation and context will reduce confusion for the forementioned parties.</p> <p>It is proposed the following wording should be added to policy 2: "Consent authorities must still consider the protective emphasis of section 6 and applicants should demonstrate that options and technologies for addressing adverse effects had been adequately considered. Consent authorities should enable well-designed and appropriate projects to gain consent and ensure that these remain commercially viable."</p>
			Policy 3	Conditional support	<p>The Council supports the intent of the policy and believes consent authorities should recognise the relative reversibility when considering consent proposals for certain technologies.</p> <p>Because the concept of reversibility is open to interpretation, the Council believes that the policy wording is not strong enough and requires more clarity in relation to the transitional nature of certain technologies and the ability to return the environment to its pre-development state following a project’s economic life. It is important to clearly define what is meant by reversibility and there is scope to be explicit in stating which technologies have high degrees of reversibility in the Government’s view. Wind energy and marine energy were used as examples in the explanation note.</p>
			Policy 4	Support	<p>The Council believes that in relation to wind energy, Plan Change 32 currently covers the requirement relating to “the identification and assessment by generators of potential sites and energy sources for renewable electricity generation”.</p> <p>The Council believes that further amendment to the District Plan is not required. Practically, it is not appropriate to make plan changes relating to hydro and geothermal generation technologies (as they are not viable in Wellington) and regional councils are responsible for consenting activities relating to marine energy research and development.</p> <p>The Council believes it is important to encourage research and investigation into new sites and sources of generation as well as emerging technologies. The Council therefore supports the intent of the second bullet of policy 4 and will look for opportunities to strengthen the District Plan in relation to emerging renewable electricity generation. This will likely be added in 2010 with the Second Generation Plan review.</p>
			Policy 5	Conditional support	<p>The Council strongly supports the intent of policy 5 and is currently identifying opportunities to amend the District Plan to enable the development of small-scale distributed generation activities. The Council understands that removing barriers for rural communities and in urban settings will help increase the viability and demand for small-scale distributed generation activities.</p> <p>The Council believes that the 4MW threshold is too high to be considered as community-scale. For example, under this threshold wind farms that include sixteen 0.25MW turbines (equivalent to the Brooklyn Turbine in Wellington, which is 31m high) or eight 0.5MW turbines are classified as community-scale. The Council believes that it may be appropriate to have different capacity threshold scales for different technologies: wind, geothermal and hydro. The Council believes that more work and consultation is required to properly define a community-scale project.</p> <p>The Council submits that when an appropriate scale for small and community-scale distributed renewable electricity generation activities is defined, it is referenced in the actual policy.</p>

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37	Fonterra	Yes	General comments	Oppose	<p>Fonterra does not support the proposed NPS in its current state for the following reasons:</p> <p>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.</p> <p>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 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:</p> <p>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 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>
38	West Coast ENT Incorporated	Yes	Policy 3 - reversibility	Support	<p>Policy 3 is critical to ensuring the NPS achieves the appropriate balance between renewable energy and the impact that the construction of renewable energy sources can have.</p> <p>Policy 3 must be retained or even strengthened to ensure that adverse effects on significant values that arise from the construction of some renewable energy sources are fully considered.</p> <p>Policy 3 must be retained or strengthened to ensure the appropriate balance between renewable generation and other values is achieved.</p>
			General comments	Support	<p>West Coast ENT Incorporated (the Society) supports the Proposed National Policy Statement for Renewable Electricity Generation (the NPS).</p>

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39	Auckland Regional Public Health Service	Yes	General comments	Support	Auckland Regional Public Health Service (ARPHS) supports the adoption of the proposed national policy statement for renewable electricity generation, but suggests a minor addition to the proposed text (see suggestions under Policy 2 below).
			Policy 2	Conditional support	<p>The wording of Policy 2, while allowing for faster processing of renewable electricity generation activities, could lead to potential misunderstanding by the general public on the application of the policy ...</p> <p>Considers its concerns about potential misinterpretation of Policy 2 could be easily addressed by the addition of the phrase : "while not detracting from the requirements in Part 2 of the Resource Management Act 1991".</p> <p>Auckland Regional Public Health Service understands that there is nothing in the proposed national policy statement for renewable electricity generation to indicate that Part 2 of the RMA 1991 no longer applies, but believes that a confirmation of this would not be damaging and may provide reassurance to the general public.</p>
40	Palmerston North City Council	Yes	General comments	Not stated	<p>Palmerston North City Council opposes the preamble of the proposal. The proposal is based entirely around the promotion of renewable electricity generation does little to balance competing values such as effects on landscape features, rural amenity, including noise, and significant indigenous vegetation.</p> <p>The benefits of renewable electricity generation are evident and supported by PNCC. It is the potential, cumulative and actual effects of the development of renewable electricity generation that causes the most debate at the local level.</p> <p>PNCC takes a neutral stance with regards to the identification of renewable electricity generation as a matter of national significance.</p> <p>The preamble should be amended to describe that the proposal only provides greater certainty around the weight to be given to renewable energy proposals. It does not assist with balancing the competing values associated with the development of renewable electricity generation.</p>
			Objective 1	Neutral	<p>PNCC does support or oppose the objective of the proposal.</p> <p>PNCC recognises the objective is consistent with the NZ Energy Strategy.</p> <p>The Objective should specifically refer to the intention of the proposal to give effect to the NZ Energy Strategy.</p>
			Policy 1	Neutral	PNCC does not support or oppose Policy 1.
			Policy 2	Neutral	<p>PNCC does not support or oppose Policy 2.</p> <p>Policy 2 purely reinforces that the constraints listed will be taken into account at the local level.</p> <p>It is acknowledged that Policy 2 will also ensure consistency on this matter across the country.</p>
			Policy 3	Neutral	<p>PNCC does not support and oppose Policy 3.</p> <p>Policy 3 purely reinforces that such matters will be taken into account.</p> <p>It is acknowledged that Policy 2 will also ensure consistency on this matter across the country.</p>
			Policy 4	Neutral	<p>PNCC does not oppose or support Policy 4.</p> <p>Specifically providing for research scale investigation into emerging renewable electricity generation technologies and methods would appear somewhat difficult without being able to predict the future and the likley effects of unknown activities.</p>

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			Policy 5	Neutral	<p>PNCC does not support or oppose Policy 5.</p> <p>The main challenge with this Policy is it is difficult to predetermine the potential effects of such activities and the likely response from local communities. This means small scale and community scale renewable electricity generation activities would generally need to be listed as Unrestricted Discretionary activities within a District Plan.</p> <p>A note should be added to policy 5 noting that it is very difficult to enable or provide for small and community-scale renewable electricity generation activities within local planning documents without having a fundamental understanding of how the activities may operate and what effects they may have on the surrounding environment.</p>
41	New Zealand Geothermal Association	No	General comments	Not stated	<p>General support for a national policy statement for renewable electricity generation</p> <p>At various times, the New Zealand Geothermal Association (NZGA) members have advocated for an NPS covering the development of geothermal energy. The specific inclusion of geothermal energy within the wider gamut of renewable energy covered by this NPS largely satisfies this aspiration.</p> <p>Opposes significant modification of the call-in process. Currently, Contact Energy is satisfied with this route into the consenting of geothermal developments, whereas Mighty River Power and others are satisfied with following conventional processes. The overall goal must be a consenting environment that encourages development. While the perspectives of the respective Boards are different, what is important for investment is that they can see acceptable paths forward. Hence interference with this call-in option could be counterproductive.</p> <p>Does favour the use of an NPS to focus decision makers' attention on the national significance of these projects.</p> <p>If the effect over time on policies and decisions is not significant then a third choice would be amendment of section 6 of the RMA to include renewable electricity generation as of being of national importance.</p>
			Policy 3	Oppose	<p>Has concerns over this policy given that geothermal systems are dynamic in nature. Surface features naturally change with time so would not revert to their original state after development ceases.</p> <p>Geothermal projects are intended as renewable and sustainable developments. Wairakei can be considered as an example. After 50 years of operation, the plant is getting old and in need of replacement, with the Te Mihi plant suggested to fulfil this. However, some of the same wells and pipes will be used to supply the new station, from the same resource. There is no intent to abandon or allow the field to revert.</p> <p>There is a fundamental error in considering reversion as a criterion for projects that are renewable and sustainable, and therefore of potentially infinite resource life. For as long as there is demand for electricity (or potentially for heat in the case of geothermal energy) then consented sites will continue to be occupied.</p> <p>Policy 3 related to reversibility should be deleted as it is an inappropriate policy for a sustainable development. Currently this policy states: "When considering proposals to develop new renewable electricity generation activities, decision-makers must have particular regard to the relative degree of reversibility of the adverse effects associated with proposed generation technologies."</p>

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			Policy 4	Not stated	<p>As a rule, current plans and policies in the regions of current development focus are probably adequate for geothermal development. However, this policy may become of increasing interest as the high temperature, high production fields are developed and next options are considered. There may be growing interest in development of lower temperature resources largely for heating (and therefore outside the current scope of a National Policy Statement). The next electricity options on the global scene are known as enhanced geothermal systems (EGS) and could be located almost anywhere in the country. There are currently no good models of RMA-planning-related policy with respect to EGS resources.</p> <p>Notes that if Policy 4 is introduced, then because of potential national application of EGS, then every region will have to consider policies related to this.</p>
			Policy 5	Conditional support	<p>Notes that some councils (especially Environment Waikato) already have policies and plans specifically to enable the development of small scale electricity generation. The Board of Inquiry is seeking some guidance on potential thresholds to be targeted by such a policy.</p> <p>In the case of geothermal developments, there have been several examples of incidental projects that take advantage of otherwise unused heat streams. Examples include the binary cycle plant at Kawerau (totalling 5.9 MW) and the more recent Wairakei binary plant (rated at 14 MW but capable of up to 20 MW on occasions). These could all be considered small scale efficiency improvements to a development.</p> <p>These days the cost of drilling poses a significant hurdle to development. Normally interest would be in large scale development, but if a field had unfavourable production characteristics, then a decision could be made to abandon further development and try to maximise the benefit from the poor exploration wells. In this event, a small-scale threshold of the order of 15 to 20 MW suggested by the cases above is likely to cover a development.</p>
42	Windflow Technology Ltd	Yes	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) 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.</p>
			Policy 1	Conditional support	<p>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.</p>
			Policy 2	Not stated	<p>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 built within a certain area of it.</p>
			Policy 3	Support	<p>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.</p>

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			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 support	<p>As stated in the Section 32 evaluation "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 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.</p>
43	Bioenergy Association of New Zealand Inc	Yes	General comments	Not stated	<p>Supports the adoption of a National Policy Statement for Renewable Electricity Generation. Favours the use of an NPS to focus decision makers' attention on the national significance of renewable energy projects.</p> <p>Over time, if the effect on policies and decisions is not significant, then BANZ recommends that Section 6 of the RMA Act be amended to include renewable energy as being of national importance.</p> <p>However bioenergy's application is wider than electricity generation, including heat supply, production of biogas, and the production of liquid biofuels. Many of the proposed policies and plans associated with electricity generation can readily be adapted to heat, biogas and liquid biofuel applications.</p> <p>... Consideration of local vs national interests will be provided with greater balance through adoption of this NPS if it is broadened to cover all forms of renewable energy.</p>
			Policies 1, 2, 4 and 5	Conditional support	<p>Policies 1, 2, 4 and 5 should be rewritten replacing the words 'electricity generation' with the word 'energy'.</p>
			Policy 2	Conditional support	<p>Bioenergy projects can optimise the use of biomass resources (eg forest harvest residues, municipal waste, farm waste, crop residues) that are currently wasted. However, obtaining consents for plants that have air and water discharges can be difficult, especially when avoiding, remedying or mitigating any potential adverse environmental effects proves difficult. Policy 2 is therefore supported but with the recommendation that it applies to renewable energy projects in general and not just those associated with electricity generation.</p>

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			Policy 3	Oppose	<p>Has concerns around this policy given that renewable energy projects are often site specific and while a building or other construction can always be removed, it is often costly (and sometimes of little value) to revert the land to its original state after the project ceases.</p> <p>Secondly, many projects are intended as renewable and sustainable developments with plant and equipment being replaced with more modern equipment while retaining some still useful plant and buildings. A cogeneration plant can be considered as an example where the feedstock and fuel handling equipment may change over time but the boiler and generator may be able to be refurbished and used for another period.</p> <p>There is a fundamental error in considering "reversibility" as a criterion for projects that are renewable and sustainable, and therefore of potentially infinite resource life. For as long as there is demand for energy then consented sites should continue to be used for energy production.</p> <p>Submitter requests that Policy 3 be deleted.</p>
			Policy 4	Conditional support	<p>BANZ supports this policy in principle but would prefer an earlier date. We believe the effective date could be 31 March 2010, as investigation lead time and technology adaptation to NZ conditions may take 2-3 years to be able to underpin implementation by local authorities.</p> <p>It is recommended that the policy be reworded so as to apply to energy projects in general and not just electricity generation projects. The policy should also be modified to cover "existing and new technologies"</p>
			Policy 5	Not stated	<p>Local authorities are often in a very good position to provide leadership on local distributed energy supply initiatives regardless of whether the energy is to be used for electricity generation, heat production or liquid fuel production. It is very important however, that the policies of the local authorities do not introduce bias as to the uses of local energy resources. Skewing use of local energy resources towards electricity may impose costs on other energy users that lead to sub-optimal energy utilisation.</p> <p>Distributed energy projects can provide a significant benefit to the local supply of electricity in that they reduce the demand for electricity through energy switching, or they can free up gas and hydro energy for more valuable use.</p>
44	Palmer, Kenneth	No	General comments	Not stated	<p>The proposed NPS is concise, but is basically sufficient for the purpose.</p> <p>Conciseness should be commended as a virtue under the RMA.</p> <p>The submitter attaches his article "Wind Power Consents in New Zealand" published conference paper of 2007.</p>
			Policies 4 and 5	Not stated	<p>The functions of regional councils as against territorial authorities under the RMA are not alluded to under policies 4 and 5. Those functions or the demarcation of jurisdiction cannot be extended by a NPS to the extent that a matter could become ultra vires the RMA. One assumes the respective councils will be aware of their respective functions and will act accordingly. Reference can be made to Canterbury Regional Council v Banks Peninsula District Council [1995] 3 NZLR 189 on the matter. It is possible that policies 4 and 5 could be qualified by some wording drawing attention to actions to be taken within the appropriate functions and roles of regional councils and territorial authorities.</p>
			Policy 4	Support	<p>Policy 4 (i) could lead to local authorities identifying suitable sites for wind farms or excluding sites not seen to be suitable. This is commendable. The Board may be aware that this approach has been adopted in Wales UK. Reference can be made to an article by Marcus Trinnick, "Green on Green: Planning for Wind Energy" (2006) 34 Journal of Planning and Environmental Law, Occasional Papers 89-113, at 102.</p>

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45	Major Electricity Users' Group	Yes	General comments	Oppose	<p>Considers the objectives of the NPS are misguided and the policies to achieve such objectives are confused and lack robust or rigorous assessment and evaluation. It is acknowledged that the Government has unilaterally determined that 90 per cent of electricity generated in New Zealand should be derived from renewable energy sources by 2025 but the costs and benefits of such a target have been expressed in qualitative terms rather than quantitative terms. To date the community has had little opportunity to debate this objective so it is important that "matters to be explicitly addressed" (detailed in the terms of reference) are fully explored by the Board.</p> <p>Considers the section 32 report has failed to adequately consider the benefits and costs of all options. The proposed NPS and implementation of the restriction on new thermal generation will add excessively high costs to an economy which is already under stress.</p> <p>Therefore the proposed NPS should not proceed.</p>
			Policy 3	Oppose	<p>The costs of determining and managing "the relative degree of reversibility" proscribed in Policy 3 are unlikely to be trivial. The issue of environmental reversibility/irreversibility (let alone an acceptable definition) appears to be a matter where consensus is seldom if ever found. The costs of attempting to deal with this policy will be high for all stakeholders. The section 32 analysis suggests that it may create an implicit bias against large scale hydro developments. This may be correct but it will also add costs to all consenting processes associated with electricity generation.</p>
46	Otago Fish and Game Council	Yes	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 requiring much greater levels of energy conservation; Giving weight to factors such as environmental impacts and reversibility.
			Policy 3	Conditional support	<p>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.</p>

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47	Wanganui District Council	No	General comments	Not stated	<p>Wanganui District Council - officer only submission.</p> <p>Considers the provision of non-statutory guidance would be a better option to achieve the identified objectives. Non-statutory guidance, in combination with the existing changes to section 7 of the RMA 1991 would be sufficient to guide decision makers.</p> <p>The importance of national electricity supply coupled with supporting small and community-scale renewable electricity generation appears to be somewhat contradictory in nature. It is not clear how applications for small and community scale renewable electricity generation will sit in comparison with those of national importance.</p> <p>The potential cost to local authorities in giving effect to the NPS, are significant. The Section 32 report has identified the potential monetary costs that a Territorial Authority will incur, however no assessment has been made of the potential environmental costs that local communities may face.</p>
			Policy 1	Not stated	Although the intent of the NPS is to provide increased certainty when considering applications for renewable electricity generation, there is no clear guidance given on how to balance national benefits against local effects. This lack of certainty for weighing national and local priorities will result in varied assessments for renewable electricity generation development depending on the local authority involved, and would therefore not achieve the desired certainty.
			Policy 2	Not stated	Requiring decision makers to consider the practical constraints that may limit the ability of developers to avoid, remedy or mitigate the adverse effects of renewable electricity generation activities assumes unreasonable decision are being made on existing applications. This objective is not required as current decision making processes would consider constraints on developers, however, not with a weight that would result in significant adverse effects on the environment. If the intention is to allow local adverse effects to the national benefit, then the NPS should come out and say it.
			Policy 3	Not stated	This Policy does not provide any guidance relative to the varying timeframes that may be involved. It could prove difficult for decision makers to weigh effects generated over the application timeframe with the degree of reversibility.
48	Te Runanga o Ngai Tahu	Yes	General comments	Conditional support	<p>The NPS will help promote the development of innovative renewable energy generation technologies that will assist New Zealand to reach its target for renewable electricity generation of 90% by 2025.</p> <p>The attention of the Board of Inquiry is respectfully drawn to the special status of Te Rūnanga. Te Rūnanga notes that this submission should not be treated as a single submission, in the manner customarily adopted by Board of Inquiry, but should be accorded the status and weight due to the tribal collective, Ngāi Tahu Whānui, which it represents.</p> <p>The most important thing for Te Runanga o Ngai Tahu is that the promotion of renewable electricity generation does not in any way weaken the duty to avoid, remedy or mitigate the adverse effects on the environment. In order to ensure the achievement of this requirement, the proposed NPS should be amended to reinforce the fact that it in no way elevates the national benefits of renewable electricity generation further up the Part 2 hierarchy of considerations.</p>
			Objective 1	Support	Te Runanga o Ngai Tahu is supportive of the intention of Objective 1, to ensure that the national benefits of renewable electricity generation are given appropriate weight and recognition by those charged with making decisions under the Resource Management Act 1991 (the RMA).

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			Policy 1	Conditional support	<p>While Te Runanga o Ngai Tahu is generally supportive of the intention of Policy 1 is concerned that it implies the national, regional and local benefits of renewable electricity generation may outweigh the purpose of the RMA contained in section 5 (especially the need to avoid, remedy or mitigate adverse effects) or the matters of national importance contained in section 6.</p> <p>Considers the NPS as presently worded creates potential for adverse effects to be discounted in favour of promoting the national benefits of renewable electricity generation. Such an interpretation is contrary to the purpose and principles of the RMA and accordingly, we seek that the proposed NPS be amended so as to clarify that the benefits of renewable electricity generation do not supersede higher ranking Part 2 matters.</p>
			Policy 2	Oppose	<p>Te Runanga o Ngai Tahu is particularly concerned with proposed policy 2. Contrary to the Ministry for the Environment's assessment of the policy (pages 37-39 of the section 32 evaluation) the inclusion of this policy in the NPS favours renewable electricity generation activities at the expense of the natural and physical environment. Considers Policy 2 potentially goes beyond the permissible scope of a NPS.</p> <p>Refer to submission for Te Runanga o Ngai Tahu's specific concerns with particular parts of Policy 2.</p> <p>Recommends that Policy 2 should either be removed altogether or amended to better reflect the ongoing need when applying section 5(2)(c) to renewable energy generation proposals to take into account all potentially relevant considerations, especially those relating to the scale and degree of the effects on the environment.</p>
			Policy 3	Support	<p>Te Runanga o Ngai Tahu strongly supports the incorporation of Policy 3 into the NPS. In order for an energy generation proposal to be genuinely renewable, it must also be reversible. An electricity generation project cannot be referred to as renewable unless, at the end of its lifespan, it is capable of being dismantled and the environment returned to its original state.</p> <p>In respect to hydro-electricity generation, Ngai Tahu has long held the view that, although the water itself might be renewable, the rivers themselves are not. In fact, for the reasons outlined in the submission, almost all of Ngai Tahu's experiences with hydro electricity generation to date have been negative:</p> <p>If the effect of policy 3 is to prove prejudicial against those technologies with functionally irreversible effects (such as hydro electricity generation), then that is acceptable to Te Runanga o Ngai Tahu. Development of renewable electricity generation should take place in a more environmentally benign manner.</p>
			Policy 4	Conditional support	<p>Te Runanga o Ngai Tahu supports proposed policy 4 on the basis that it will promote a planned and strategic approach to the exploration of renewable electricity generation opportunities. Having said this, the proposed policy (and the resulting plan changes) must not result in a lessening of the ability to assess the effects of exploration and investigation activities on the environment. It should not be assumed that simply because generators are merely exploring renewable electricity opportunities that the adverse effects will necessarily be less than minor. There will still be a need for each case to be considered on its own merits.</p>
			Policy 5	Conditional support	<p>Te Runanga o Ngai Tahu supports proposed policy 5, provided that it does not result in a lessening of the ability to assess the effects of small scale generation activities on the environment.</p>

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			New Policy	Not applicable	Suggests inserting an additional policy into the NPS such as: Nothing in this NPS affects either: i. The underlying requirement for all decisions to promote the sustainable management of natural and physical resources; or ii. The section 7 status of “the effects of climate change” and “the benefits to be derived from the use and development of renewable energy”.
49	Port Nicholson Block Settlement Trust	No	General comments	Oppose	<p>Does not support the use of a NPS for renewable energy for the following reasons:</p> <ul style="list-style-type: none"> - There is a lack of clarity around the issues that the proposed NPS is meant to address; - The lack of analysis on how this NPS is likely to impact on Maori; - The potential for renewable electricity generation activities and interests to infringe on, to erode existing Maori property rights, or to breach Treaty of Waitangi principles; - A weak cost analysis. <p>Refer to submission for a detailed analysis of these points.</p> <p>Seeks the following changes to the NPS: An explicit statement that this NPS be removed because:</p> <ul style="list-style-type: none"> • It is non-transparent; • The cost of NPS could affect disproportionately higher numbers of Maori consumers and communities; • It increases the likelihood of infringement on Maori property rights in the guise of national interest; • It shifts the burden of cost from Treasury’s original assumptions that New Zealand would be in credit with regards to greenhouse gas emissions whereas it now appears that we will be significantly in deficit; • Since that assumption has been found to be flawed, government is now endeavouring to shift the cost to consumers (communities); • Government’s current policy has agriculture (largest emitter) as being provided an adjustment period and not being phased into the NZETS until post 2012 whereas the stationary energy sector is entering much earlier and being doubly penalised with an NPS that appears unjustified.
50	Auckland Conservation Board.	Yes	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	<p>Supports the first paragraph of Policy 2 and provision ‘i’ and submits that these must be robust and specific.</p> <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</p> <p>Refer to submission for further comments on Policy 2.</p>

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			Policy 3	Support	<p>The Conservation Board strongly 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>
			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 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	<p>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.</p>
51	Ecologic	Yes	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 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>

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			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's earlier 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 introducing a concept of reversibility, which is integral to the notion of sustainable management of resources. Pleas 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>
52	New Zealand Wind Energy Association	Yes	General comments	Conditional support	<p>NZWEA strongly supports developing a NPS to promote the development, upgrading, maintenance and operation renewable electricity generation activities throughout New Zealand. However, NZWEA does not consider that the NPS, as presently drafted, will achieve its objectives.</p> <p>"If New Zealand is serious about achieving the objective contained in the Statement then the Statement must: (a) enable increased levels of renewable electricity generation; and (b) provide meaningful guidance to planners and decision-makers."</p> <p>Key issues identified in NZWEA's submission are : Insufficient Guidance; Need to recognise each type of renewable electricity generation; Enabling renewable energy generation; Recognition that renewable electricity generation can only occur where natural resources exist; Protection of renewable electricity generation resources; Lack of guidance on applying section 7 matters; Recognition of the need for transmission; Need for consistent application of technical standards; Need for urgent action to give effect to the statement.</p>
			Objective 1	Conditional support	<p>As presently worded, the Objective could be read as only encouraging the development of renewable electricity generation until such time as the 90% target is achieved.</p> <p>Reword Objective to achieve at least 90% of electricity generation from renewable sources by 2025.</p>
			Policy 1	Conditional support	<p>NZWEA supports the general approach of the policy, but considers that it needs to provide greater guidance to planners and decision-makers on the benefits of renewable energy generation, both in terms of the benefits applicable to all forms of renewable electricity generation and benefits specific to each form of renewable energy generation.</p> <p>NZWEA also recommends that a new Policy should be inserted immediately after Policy 1 to ensure decision makers introduce changes to policy statements and plans to provide for benefits of renewable electricity generation as a matter of national significance. Rewording of Policy 1 and a new Policy 2 suggested in 3.13 of the submission.</p>
			Policy 2	Conditional support	<p>While NZWEA supports the general intent behind this policy, it considers the present drafting of the policy is open to misinterpretation and is too generic in its application, and that specific mitigation policies for each individual renewable electricity resource are required.</p> <p>Changes to Policy 2 are recommended in para 3.27 of the submission and a new policy "Protecting Renewable Electricity Generation Resources" is recommended in para 3.28.</p> <p>NZWEA also seeks that the Board recommends that additional guidance be developed to further assist with the protection of these areas, and to educate and inform landowners.</p>

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			Policy 3	Oppose	NZWEA opposes the proposal to include a policy on the relative reversibility of the effects of renewable generation activities. NZWEA seeks the deletion of Policy 3.
			Policy 4	Conditional support	NZWEA considers that allowing local authorities to wait until 2012 to notify plan changes is not consistent with the goal of enabling 90% renewable generation by 2025. The submitter suggests a timeframe of two years. Changes are suggested to Policy 4 in para 3.37 of the submission. NZWEA urges the Board to recommend that national guidance be prepared to support the implementation of the NPS.
			Policy 5	Conditional support	Subject to the comments made on on Policy 4, NZWEA supports the development of small and community scale distributed renewable energy generation within a specified period, however NZWEA strongly recommends that enabling provisions for developing large-scale renewable electricity generation be given the same urgency. In terms of providing for large scale renewable electricity generation the recommended new policy is set out in NZWEA's suggested new Policy 2. (see para 3.13 of the submission). Reworded Policy 5 provided in paras 3.43 and 3.44.
53	Climate Defence Network	No	General comments	Not stated	Supports the introduction of the NPS because CDN believes there is a large future for small embedded electricity generation and that there are several institutional barriers to entry for these systems of which the RMA is only one. CDN believes the NPS does not go far enough because it does not prioritise the impacts of climate change on the environment highly enough. The potential impacts of climate change are so severe and far-reaching that mitigating them must be accorded the highest priority. CDN recognises the need to balance local adverse impacts with national and international benefits; however CDN also believes that the RMA as it stands may place too much emphasis on the adverse local impact on the present generation and not enough emphasis on the national costs and global impacts to future generations. In particular CDN notes that future generations cannot be represented in the Environment Court.
			Policy 4	Not stated	CDN believes the wording of Policy 4 is too vague and unclear about what Councils are supposed to do. It submits that it would be better to develop one statement that all Councils could use rather than ending up with different statements in every plan.
54	Unison Networks Limited	Yes	General comments	Support	Unison supports the preamble, and the framework it provides for the NPS approach, in particular the point that the government has determined that 90 percent of electricity generated in New Zealand should be derived from renewable energy sources by 2025. Unison considers the last paragraph highlights the benefits and costs associated with development of renewable electricity generation, giving recognition to the positive effects that manifest nationally. Unison agrees with the inclusion of the last sentence in the preamble, as it clearly indicates that there is a requirement for consistency and greater certainty in respect to the decision making process.

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			Objective 1	Support	<p>Submits that the objective statement is crucial, as it ensures interested parties know the government's expected outcome from the NPS.</p> <p>The statement recognises the national significance of renewable electricity generation, and specifies the outcome expected in an RMA context with the inclusion that 90 percent of New Zealand's electricity will be generated from renewable energy sources by 2025.</p> <p>Supports the recognition of the development of existing renewable electricity generation activities. As noted in the s32 evaluation there are economic benefits to optimising the potential returns from existing investment.</p>
			Policy 1	Conditional support	<p>Unison supports how the national significance is not dependent on the scale of the project or the level at which these benefits manifest themselves.</p> <p>Section 7(j) of the RMA already requires decision-makers to have particular regard to the benefits of renewable energy in a general sense. The Environment Court has recently commented in the Mahinerangi decision "We conclude that the purpose and effect of the insertion of 7(j) is to avoid relitigating on a case by case basis the benefits of renewable energy over those which use non-renewable energy sources (coal, gas etc). If Parliament had intended to require such benefits to be proven in each case there is little point for 7(j)."</p> <p>Policy 1 therefore augments section 7(j) by identifying specific benefits, which would be part of the decision-making process if they applied to a particular proposal. While the benefits identified in the NPS are useful, it may be worthwhile to identify further benefits in order to require decision-makers to consider each of those specific benefits in addition to benefits of renewable energy generally.</p>
			Policy 2	Support	<p>Unison supports how the NPS provides guidance to consent authorities on how to manage adverse environmental effects of renewable electricity generation activities taking into account the constraints outlined.</p> <p>The majority of renewable energy sources are in locations that present numerous challenges, logistically and technically. By including an obligation for consent authorities to take into account these constraints, projects in certain areas will be more readily consentable. To-date significant time and cost has been expended trying to overcome unavoidable constraints and to counter unrealistic claims by opposing parties in terms of impractical or unachievable options.</p>
			Policy 3	Support	<p>Unison is supportive of the inclusion of the "relative degree of reversibility" associated with technologies, as this does not require a proposal to be completely reversible to receive the benefit of Policy 3. Similarly the s32 report refers to the environment being returned to the pre-development state "to a greater or lesser degree" and supporting generation technologies with "relatively little long-term impact". This policy is consistent with the Mahinerangi decision, and appears to be specifically designed to support wind generation in general. However its concern would be that in doing so it may inhibit other forms of generation (particularly hydro).</p>
			Policy 4	Support	<p>Unison is supportive of the changes that will ensure that objectives and policies are consistent across local authority boundaries. There will be significant benefits for generators, from the perspective that they can form a view of the resources and opportunities available in New Zealand. Currently there is a significant cost financially and time wise in respect to plan advocacy. It is putting emphasis on the fact that local authority changes are needed by a certain time to meet to the 90 percent target detailed in the objective. Nationally everyone benefits from renewable generation due to the displacement of fossil-fuel based alternatives.</p>
			Policy 5	Conditional support	<p>Unison promotes the definition of small scale generation as being up to 10MW. The reason for this is legislative consistency with Electricity Industry Reform Act and belief that a 10MW project would not have significantly greater effects than a 4MW project.</p>

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			New Policy	Not applicable	<p>Unison considers it may be useful to include a policy protecting new and existing generation from reverse sensitivity effects. For example, it may be desirable to prevent residential activities being established that are sensitive to the noise effects of wind generation, and could therefore interfere with operation.</p> <p>Suggests the following: "Decision-makers must manage new third party activities to ensure that the reasonable operation and maintenance needs of consented and existing renewable electricity generation activities are not compromised."</p>
55	Environs Holding Ltd	No	General comments	Not stated	<p>Concerned that no consultation with Te Uri o Hau (or Environs Holding Limited) has occurred in relation to the preparation of this NPS. Despite the fact that the requirement for consultation is particularly relevant for Te Uri o Hau and other iwi as the NPS will promote development that could adversely affect Maori and have detrimental implications in terms of the Treaty of Waitangi. Requests immediate consultation be undertaken with iwi and hapu in order for the Minister to fulfil the obligations contained in section 46 of the Act.</p> <p>Second concern is based on the fact that it is claimed that this proposal has been developed to ensure a consistent approach across the country. Considers that if this is what is sought, the policies will need to include a lot more detail. Believe that the vague nature of this NPS may encourage ad hoc development of energy generation across the country and in areas where it may be inappropriate to do so.</p> <p>Refer to submission for further general recommendations.</p>
			Policy 2	Not stated	<p>Considers the wording of policy 2 is extremely confusing. It appears to suggest that when it comes to renewable generation activities, councils and other decision making authorities can effectively bend the rules that have been developed to avoid, remedy or mitigate adverse environmental effects.</p> <p>It proposes that Policy 2 be amended to make it easier to understand while at the same time ensuring that the requirement to avoid, remedy or mitigate the adverse environmental effects of renewable electricity generation activities is not compromised solely because of the fact that the project involves renewable electricity generation.</p>
			Policy 3	Not stated	<p>The reference in this policy to a "relative degree" of reversibility of adverse environmental effects is not sufficiently defined, leaving it open to interpretation and enabling the relevant authority or even the Courts to determine what is a "relative degree" of reversibility.</p> <p>There is a need to clearly define the term "a relative degree of reversibility" or alternatively use another term in its place.</p>

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56	Resource Management Law Association	Yes	General comments	Not stated	<p>The RMLA considers the NPS as it stands may miss a unique opportunity to bridge the gap between the high level objective and effective local implementation. More specific guidance is needed to avoid multiple consideration of and excessive variation in approach to very similar issues, that may not ultimately achieve the intended outcomes. Considers there is an opportunity to provide more direction to local government without being unduly prescriptive. Refer to submission for specific examples of what additional direction could be provided on.</p> <p>RMLA also considers more emphasis needs to be given to how the proposal will work in tandem with the existing NPS on Electricity Transmission.</p> <p>Notes that one of the most significant challenges facing RMA practitioners is making judgements between the competing matters set out in Part 2 of the RMA. The Association understands that the RMA doesn't give an NPS a pre-eminent role, and its interpretation will always be subject to Section 5 and other matters in Part 2 of the Act. However, the Association considers it would be useful if the proposal could provide some guidance on how the proposal will fit with Part 2 matters. For example, guidance could be given on: (a) How those judgements are to be made; or (b) how those matters in Part 2 are to be assessed.</p> <p>RMLA also considers there is room for confusion over the timing for giving effects to this NPS. Policies four and five name a specific date (13 March 2012) by which a plan change must be notified. However, policies one and three do not name a date, and the explanatory note in the last paragraph implies that all the NPS provisions are to be implemented by March 13 2012.</p>
			Policies 4 and 5	Conditional support	<p>Considers that the proposal could be more ambitious in relation to Policies 4 and 5, and direct that local authorities introduce planning provisions not only relative to issues of identification, assessment and research, but as to the renewable electricity generation activities themselves, and not just at the small or community scale. Planning instruments provide an opportunity to signal to the public and industry where activities of this kind are (or are not) likely to be seen as appropriate, and to provide for them (at an appropriate consent status) accordingly.</p> <p>As things stand, renewable electricity generation activities may fall to be assessed as a non complying activity by default in many districts, for want of robust planning evaluation and frameworks involving macro level assessments of the kind that could be prescribed by the NPS, with guidance to local authorities as to how to make such assessments consistent with the objective of the NPS.</p>
57	Joel, Annette	No	General comments	Oppose	Annette Elizabeth Joel endorses the submissions of Owen McShane - refer to submission 120 - Centre for Resource Management Studies.
58	Otago Regional Council	Yes	Policy 1	Support	The Council supports policy 1
			Policy 2	Support	The Council supports policy 2
			Policy 3	Support	The Council supports policy 3
			Policy 4	Oppose	The Council opposes Policy 4. Council's opposition is based on the weight to be given to the NPS when making decisions on any resource consent application
			Policy 5	Oppose	The Council opposes Policy 5. Council's opposition is based on the weight to be given to the NPS when making decisions on any resource consent application

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59	New Zealand Historic Places Trust	No	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 complex costs and benefits of renewable electricity generation and provide greater recognition of Maori values and the principles of the Treaty of Waitangi.</p>
			Objective 1	Conditional support	Recommends an amendment to recognise the Government's intention to safeguard the environment.
			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.
			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 environmental effects.
60	Waikato Raupatu Trustee Company Ltd	Yes	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.
			Objective 1	Not stated	<p>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.</p> <p>Waikato-Tainui is resolute in stating that a Tangata Whenua policy should be included.</p>
			Policy 2	Conditional support	<p>Waikato-Tainui would like to include the following as point (v) of policy two:</p> <p>"(v) the location of sites of significance to iwi."</p>
			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	<p>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.</p> <p>Waikato Tainui insists that all Iwi are directly involved in decision makins on subsequent proposals, in order to ensure that the renewable energy 'goldrush' does not have dire consequences on our area of responsibility.</p>
			Policy 5	Not stated	Waikato-Tainui would prefer that (if sustainable), energy sources should be located nearer to the area of demand.

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61	Hamilton City Council	Yes	General comments	Conditional support	HCC seeks the following general amendments: a) Ensure that, in the context of New Zealand's freshwater resource, municipal water supply has priority over the competing demand for renewable electricity generation. b) Provide stronger guidance as to how local authorities are to weigh competing values and interests in the context of renewable electricity generation. c) Ensure the most efficient and effective implementation of the Proposed Renewable Electricity Generation NPS by: i) Requiring regional authorities to develop regional energy strategies for each region which will inform planning for renewable energy generation. ii) Requiring regional authorities to investigate other means (including, if necessary, via other legislation) of providing guidance in relation to energy issues arising in their region which will inform planning for renewable energy generation (such as regional energy strategies), assuming that it is lawful to do so. d) Recognise the issues associated with different sources of renewable energy and provide guidance in that regard.
			Policies 4 and 5	Conditional support	HCC submits that Policy 4 and Policy 5 should be amended to require regional councils to amend regional planning instruments and set timeframes for the promulgation of district planning instruments. The Waikato Regional Council (Environment Waikato) is developing a Regional Energy Strategy which will inform regional and district planning documents. HCC submits that this is an appropriate planning approach to the development of renewable energy initiatives.
			General comments	Not applicable	Recommends including definitions of the terms 'renewable energy' and 'micro generation'. Clarify whether the Proposed Renewable NPS captures expansion of existing renewable energy generation and, if not, provide guidance in that regard.
62	Douglas, John	Yes	General comments	Not stated	The RMA does not appear to provide for the withdrawal of a NPS. Considers that there is a need to be able to respond rapidly to new knowledge and understanding. Considers that the use of targets should be abandoned and cost-effective price signals should be used to encourage any necessary changes in resource allocation. Recommends the NPS be rewritten to require plan writers and decision makers to have particular regard to the total cost of all renewable electricity generation, taking into account the full costs of any necessary standby generation plants. Notes that the reference group report of May 2006 and the s32 analysis did not identify any serious problem with current RMA practice, in relation to the specific issue of consenting of renewable energy generation plants. Recommends amending "renewable electricity generation" to mean generation of electricity from solar, wind, hydro, geothermal, biomass, tidal, wave, or ocean currents resources, and to have an open mind at all times to the prospect of nuclear energy.
63	Brosnan, Helen	Yes	Policy 1	Conditional support	Considers that if the policy is about 'national benefits' it should also consider national and regional and local benefits of not carrying out a certain proposal for example the recreational and landscape values associated with the resource.

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			Policy 2	Not stated	<p>Considers that this policy fails to discuss how to avoid, remedying or mitigating adverse effects or to overcome the constraints noted within the policy.</p> <p>Whilst generating electricity is renewable, the number of sites or opportunities for generation are finite. Policy 2 appears to be making it easy for generators to access these finite sites. The permissive nature of the proposed NPS fails to accord with the principle of sustainable management and therefore the scope of this policy needs to be reviewed.</p>
			Policy 3	Not stated	Delete or re-word to make it clear that wind farms are preferable to eg hydro dams as the adverse effects are reversible.
			Policies 4 and 5	Not stated	<p>It is recommended that these policies are deleted.</p> <p>If the policies are not deleted, they should be changed to provide for consideration at the time of next review ie delete the date (13th March 2012).</p> <p>Furthermore, if such plan changes were to be carried out, subsequent protection of wild and scenic rivers would need to be carried out in tandem with a 'prospecting' exercise, in order to ensure part 6 matters were clarified in favour of protection of these resources.</p>
			General comments	Not stated	Considers that New Zealand needs a realistic, conservation based approach to management of NZ's water resources which also protect the internationally renowned white water recreational resources. The NPS fails to provide any such approach or protection of recreation resources. The NPS needs to be significantly altered before it will accord with the principles of sustainable management and sustainable development.
64	Contact Energy Limited	Yes	General comments	Not stated	<p>Considers that the NPS should provide unequivocal policies that will actively promote and facilitate renewable generation through the RMA process. Submits that the NPS as drafted does not provide this lead. There is no policy that states simply that it is desirable that renewable generation be consented (and recon consented).</p> <p>Further, some of the policies in the proposed renewables NPS favour one type or scale of renewable generation over others, effectively setting up obstacles to consenting some renewable energy. Contact opposes such limitations as unsound in principle and inconsistent with the stated Objective.</p> <p>Contact does not believe that the 90 per cent renewables target will be achieved by a focus on one renewable technology alone, or even a small selection of the available technologies. It believes that any attempt in the renewables NPS to do so will inevitably mean that its Objective will not be achieved.</p> <p>Contact considers that there is a need in this renewables NPS for additional policies to fully address the issues relevant to renewable generation.</p> <p>Recommends that mention be made in the preamble of the need for peaker power stations to support weather dependent renewable electricity generation during periods when the output from that plant is low.</p>

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			Objective 1	Conditional support	<p>Contact supports the intent of the Objective. It is suggested that its intent may be made clearer with a minor amendment of the text (which replaces the word 'such' with the words 'in order'.)</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" (deleted) "in order" (added) that 90% of New Zealand's electricity will be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year)”.</p> <p>See para 17 of the submission.</p>
			Policy 1	Conditional support	<p>Contact supports Policy 1, however, has concerns as to the inclusion of the phrase “at any scale” in the Policy. The Policy is thus stating that any renewable generation activity, irrespective of size or energy contribution, is of national significance (and thus promoted by Policy 1). This is factually incorrect and weakens the assistance given by the Policy to projects that are of sufficient size to make a meaningful contribution to reduction of greenhouse gas emissions and to security of electricity supply. Even without those words, the inclusion in the Interpretation section of an explanation that “renewable electricity generation activities” include “small and community-scale distributed renewable electricity generation” has the effect that the Policy would promote small scale generation as being nationally significant.</p> <p>If the intention of the Policy is to suggest that small scale generation activities may cumulatively be of national significance, Contact would not oppose such a concept.</p> <p>Contact recommends specific amendments to Policy 1 - refer to submission for details.</p>
			Policy 2	Conditional support	<p>Contact considers that it is not clear that Policy 2 requires consent authorities to have a positive particular regard to the listed constraints. Considers that this Policy needs amending to clarify that the regard that the consent authority is intended to have in relation to the factors listed in setting conditions, is intended to assist in the promotion of renewable electricity generation projects.</p> <p>Contact also considers that this Policy needs more radical amendment to expand its scope. There is no Policy in the renewables NPS that promotes unambiguously the granting of consents for renewable projects. The benefits of renewable generation are identified (as does the Act already) in Policy 1, and Policy 2 suggests a degree of sympathetic assessment in relation to conditions. This is the appropriate policy to broaden to become a positive promotion of consents for renewable electricity generation projects.</p> <p>Without such a revised Policy the renewables NPS presents a package of policies that implicitly support renewable generation but then qualify that support by scale (Policy 5), by mitigation (Policy 2), and by type (Policy 3).</p> <p>Contact recommends specific amendments to Policy 2 - refer to submission for details.</p>

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			Policy 3	Oppose	<p>Submits that a renewable project that is less “reversible” starts from a disadvantage which it does not do under the RMA. Contact considers that such a “picking winners” approach is inappropriate in an NPS. Considers that the effect of this Policy is also to undermine the Objective of the NPS as this Policy is inconsistent with the objective of “...promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities...” by putting barriers in the way of consenting some renewable proposals. This concerns Contact as to meet the 90 per cent renewable generation target by 2025 New Zealand must maximise all renewable generation sources.</p> <p>Contact's preference is that Policy 3 be deleted. However, if the Board determines that it does not wish to delete this Policy, the Policy needs to be amended to meet the intent apparently sought and to ameliorate its adverse effect on the 90 per cent renewable target. The Policy should be amended so that “reversibility” is an additional point of argument in favour of a project that can demonstrate “reversibility”. If that factor is not available to a particular project, its absence should be neutral, not negative.</p>
			Policy 4	Conditional support	<p>Contact is not aware of any major issue with the identification of renewable generation possibilities. However, Contact does not oppose such a policy as this might well extend the knowledge base from which renewable electricity generation can be developed.</p> <p>Contact notes that the Policy will require local authorities to introduce objectives, policies and methods to enable activities associated with, in bullet point (i), “the identification and assessment by generators ...”. Whilst it is important that generators be given this ability it is not just generators that might need to take advantage of these provisions. Other parties are also involved in identification and assessment of potential sites and energy sources for renewable electricity generation. The removal of the words ‘by generators’ from bullet point (i) of Policy 4 would provide suitable relief.</p> <p>Contact is also concerned that consent authorities could read Policy 4 to require that they should undertake some sort of mapping exercise to identify zones where renewable generation should be developed. Contact believes that this is unnecessary and would impose additional cost on consent authorities and hence should be avoided. Contact therefore suggests that Policy 4 is clarified to make it clear that this is not for the advantage of generators alone and to make it clear that local authorities are not mandated to zone for renewable electricity generation.</p>
			Policy 5	Conditional support	<p>Contact is concerned that this Policy makes provision only for small and community-scale electricity generation but the renewables NPS, as proposed, does not provide similar support for large scale renewable electricity generation which will be essential if the 90 per cent renewables by 2025 target is to be met. Contact’s proposed changes to Policy 1 are intended to correct this imbalance.</p> <p>Contact also cannot understand why the definition of “small and community-scale distributed renewable electricity generation” specifically excludes offshore wind, tidal and wave generation. It would seem that if the land based forms of renewable electricity generation are appropriate for use by communities then so too are these technologies. Contact suggests that the definition of “small and community-scale distributed renewable electricity generation” is amended to include offshore wind, tidal and wave generation.</p>
			New Policy	Not applicable	<p>Contact recommends several additional policies to:</p> <ul style="list-style-type: none"> - protect address reverse sensitivity - protect existing renewables - facilitate transmission lines <p>Refer to submission for specific wording of these policies and the rationale behind their inclusion.</p>

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65	Franklin District Council	Yes	Policy 1	Not stated	The basis of weighing benefits against environmental costs needs to be specified, in order to derive the full use of such guiding lists. The possibility of overlooking certain environmental costs in the background of highlighted benefits of renewable electricity generation projects will have to be carefully avoided.
			Policy 2	Not stated	While potential benefits may be relatively easy to identify and even to quantify, the environmental costs are difficult to identify and quantify accurately. A common basis should be introduced to deal with this.
			Policy 3	Not stated	Relative degree of reversibility of the adverse environmental effects needs to be established. As the costs and benefits are generally accrued to local and national levels respectively, difficulties arise in convincing the justification of the local communities.
			Policy 4	Not stated	FDC raise concerns that the time and costs associated with the plan change may be substantial.
			Policy 5	Not stated	In addition to the threshold capacity, the nature and extent of environmental effects; and the methods to control the factors that contribute to the typical adverse effects also need to be addressed for the purpose of simplifying the consenting process.
66	Kaikoura District Council	Yes	Policy 1	Support	Support for the policy is provided
			Policy 2	Conditional support	Effects of transmission loss need to be considered, neither this proposed NPS, nor the NPS for electricity transmission addresses this. Recommends 'iv' should be strengthened to encourage renewable electricity generation at the source where it is required.
			Policy 3	Support	Support for the policy is provided.
			Policy 4	Not stated	Opposes the mandatory requirement to make plan changes within a specific time frame and at the Council's cost. The s32 assessment that costs will be limited as changes will also be required for the NPS for electricity Transmission are disputed in Kaikoura's case, and that of other councils where changes are not required for that NPS.
			Policy 5	Not stated	Opposes the mandatory requirement to make plan changes within a specific time frame and at the Council's cost. The following questions must be considered: How many plans do not provide for renewable electricity generation? In how many districts are problems relating because of lack of specific policies in plans? Little is gained from a specific time dated policy and it would be more practical to allow councils the freedom to make such changes as and when seen appropriate.
			General comments	Not stated	Effects of Renewable Electricity Generation policies on amenity values. A greater balance in the NPS can be achieved by ensuring that amenity aspects are referred to in a policy. Concern exists that without a subsequent NPS on Landscape greater emphasis will be placed on the importance of Renewable Electricity Generation and landscape values will subsequently suffer.
67	South Waikato District Council	Yes	Policy 4	Not stated	Believes the Council should not be tasked with undertaking investigative research to identify potential sites and energy sources for electricity generation. The generators that wish to obtain consent for renewable electricity generation should undertake such investigations and not the Council, necessarily, but it could choose to do so.

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			Policy 5	Not stated	<p>Considers that the NPS does not provide guidance to Council on the interpretation of Cost Benefit Analysis that may be presented to support small community-scale renewable generation projects.</p> <p>The NPS only broadly defines small and community-scale projects as being less than 4MW. What would happen when several properties decide to construct a small hydro or wind generation project?</p> <p>The NPS needs to be adaptable to changes in technology around localised community-scale electricity generation.</p>
68	Waitaki Protection Trust	Yes	General comments	Support	<p>The Trust fully supports the NPS.</p> <p>New Zealand is quite a 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> <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>

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69	Waitakere City Council	Yes	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 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 on number 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>
			Objective 1 - national significance	Conditional support	<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 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.</p>

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			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>
			Policy 2	Conditional support	<p>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 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 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</p> <p>It is submitted that the policy could be clarified by rewording or additional policies which answer the questions raised above.</p>

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			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? <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 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>

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70	Infinity Investment Group Ltd	Yes	General comments	Support	<p>Infinity fully supports the NPS and the NZES's target of 90% renewables by 2025.</p> <p>Considers that 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>Considers Hydro generation is no longer environmentally sustainable, in contrast to a number of alternate energy generation options such as wind power.</p> <p>Considers the adverse effects of hydro development are irreversible and cannot be avoided, and, therefore decision makers must have particular regard to the irreversible effects of hydro development when considering proposals for additional hydro development in the South Island.</p> <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>
71	Tasman District Council	Yes	General comments	Not stated	<p>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.</p>
			Objective 1	Conditional support	<p>The Council seeks the following changes to the proposal:</p> <p>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 text or text to like effect be inserted: consistent with the provision for other significant values of land, water and coastal resources.</p>
			Policy 1	Conditional support	<p>The Council seeks the following changes to Policy 1:</p> <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	<p>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.</p>
			Policy 3	Oppose	<p>The Council seeks that Policy 3 be deleted.</p>
			Policy 4	Oppose	<p>The Council seeks that Policy 4 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.</p>

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			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.
72	Marlborough District Council	No	General comments	Not stated	<p>Most councils are still working towards proposing second generation RPSs and plans. That is the reason why the section 32 analysis has reached a conclusion that section 7 provisions have not yet been expressed in those instruments, not a lack of action on the part of councils but simply the timing of processes.</p> <p>Withdraw the proposed NPS and replace it with non-statutory guidelines for local government. The informal status of such guidelines will enable their progressive revision, in an absence of statutory constraints, and so maintain issue currency. The guidelines should be compiled and managed by a team comprised of technical experts and local government energy implementation practitioners.</p>
			Objective 1	Not stated	The genesis of the NPS resides in the implementation of Part II the RMA, which emphasises sustainable outcomes in the context of managing natural and physical resources, the objective fails to express this by not including the word "SUSTAINABLE."
			Policy 3	Not stated	<p>Provide a clear and helpful explanation of what is envisaged by the term 'relative reversibility'.</p> <p>Greater clarification of who will be responsible for that process, particularly if the generation company becomes insolvent.</p>
			Policies 4 and 5	Not stated	<p>Policies 4 and 5 places a statutory responsibility and an associated financial burden on local authorities to take definitive steps in their plans.</p> <p>Many of the smaller local authorities are not sufficiently resourced to deliver on their basic resource management responsibilities in this context, while other local authorities, that are well funded and have proportionately less responsibilities, don't notice the impact. These circumstances lead to an uneven management of New Zealand's natural and physical resources.</p>
73	Mighty River Power	Yes	Objective 1	Support	Mighty River Power supports the inclusion of this objective in the proposed NPS. Unfortunately the policies promoted in the NPS do not provide the strong guidance required to meet this objective.
			General comments	Not applicable	Integrating NPSs will increase the likelihood of Government objectives being met. It is recommended that this Board of Inquiry work with the respective boards of inquiry into the NZCPS and NPS-FreshWater so that the current tension in the various documents is eliminated.
			Policy 1	Support	MRP supports Policy 1 in its current form.
			Policy 2	Support	MRP supports Policy 2 in its current form.
			Policy 3	Oppose	<p>The concept of reversibility introduces a level of restriction and potentially a substantial barrier for energy generators which has not been placed on other resource users and developers under the RMA.</p> <p>The concept of reversibility as currently outlined in Policy 3 is inconsistent with the purpose and principles of the proposed NPS.</p> <p>MRP seeks the deletion of Policy 3.</p>
			Policy 4	Conditional support	MRP seeks the retention and amendment of Policy 4 so that it is made clear that the identification and assessment of potential sites does not require the exact sites to be identified and assessed.
74	Eastland Network	No	General comments	Support	Supports the proposed NPS as it provides greater certainty to decision makers, developers and all stakeholders in the energy industry. Agrees with the objectives of the proposed NPS and approve the proposal to recognise the national significance of renewable electricity generation.

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			Objective 1	Support	ENL strongly agrees with the objective to support opportunities for the development of community-scale renewable electricity generation, with limited environmental effects, in rural and island communities. As a local lines company, in a rural and isolated spot of the country, it sees great potential for small scale generation to meet local demand.
75	Vector Limited	Yes	Objective 1	Conditional support	Vector believes that the objective should further be expanded to ensure all renewable generation activities (regardless of size) are promoted by amending the wording of the objective. Vector considers that the application of the NPS objective should be applied consistently across all renewable technologies.
			General comments	Not stated	Vector has concerns that an indirect outcome of the NPS could be that remote large scale electricity generation solutions may be favoured over local small scale solutions. Vector believes that additional policies either within the NPS or through another tool need to be developed to ensure this does not occur. In relation to the NPS in its entirety, Vector seeks the following: (a) when interpreted, policies under the NPS do not appear to be biased towards certain sizes or types of renewable electricity generation; and (b) further work be carried out either through the NPS process or another tool to ensure small scale renewable consent regimes and processes are cost effective across Councils. Vector submits that current Local Council consent processes need to be less of a barrier for all renewables, regardless of the technology and size by ensuring simplified yet robust systems are in place to encourage their uptake. Vector suggests further time and resources should be given to the development of standards for residential solar hot water systems.
			Policy 1	Oppose	Vector opposes policy 1 of the NPS. Rather than including the two benefits, Vector would prefer that they be left out of the policy unless all benefits can be included.
			Policy 5	Support	Vector supports policy 5 of the NPS which sets out the importance of renewable electricity generation as a supported community activity incorporated into Council plans.
76	Airways Corporation of New Zealand Ltd	Yes	Policy 2	Support	Airways strongly support the wording of proposed Policy 2, and point (iv) in particular.
			Policies 4 and 5	Conditional support	Airways conditionally supports Policies 4 and 5, subject to a proposed amendment to ensure local authorities have particular regard to the need to protect strategic assets such as Airways infrastructure from adverse effects associated with renewable electricity generation activities.
77	Todd Energy	Yes	General comments	Not stated	Questions whether its appropriate for the Government to create a regulatory bias towards a particular form of development? There are other forms of development that might equally be regarded as desirable and/or sustainable, and therefore worthy of such bias but which may not be appropriate at all locations due to their environmental effects. Arguably the integrity of the RMA , in particular achievement of its "sustainable management" purpose, relies on maintenance of a neutral stance by consent authorities in respect of the form or type of development that should be allowed to take place at a given locality.
			Objective 1	Not stated	If the NPS proceeds, questions the need for the objective to start with "To recognise the national significance of..." because this is the stated purpose on a NPS. Also suggests that the wording be amended to put the focus on the management of a resource, and avoids the use of the word "activities" Considers it inappropriate for the "90% renewable electricity by 2025" target to be embodied in law.

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			Policy 1	Not stated	<p>It does not seem necessary to refer to benefits being of national significance if a NPS, by definition, deals with nationally significant matters.</p> <p>It seems counter-intuitive to suggest that renewable electricity generation activities at any scale are of national significance.</p> <p>If this policy is proceeded with, suggests removal of the first sentence.</p>
			Policy 2	Not stated	Policy 2 is confusing in its wording and, if the NPS proceeds, needs to be amended to better reflect the policy intent articulated on p37 of the section 32 analysis.
			Policy 3	Oppose	Todd is strongly opposed to this policy. Todd considers the policy is effectively saying that not all renewable electricity generation projects are equal, and that some are more desirable than others. This policy, represents a further tilting of the regulatory playing field and, in its view, an unwarranted intervention in the renewables marketplace.
			Policy 4	Support	Todd is supportive of this policy as it is aimed at removing unnecessary barriers to the development of renewable energy resources.
			Policy 5	Conditional support	Todd is supportive of this policy on the grounds that it addresses existing regulatory barriers to the development of small generation schemes, viz the disproportionately high consent costs associated with small and community-scale renewable electricity generation projects with limited environmental effects.
78	Counties Power	Yes	General comments	Not stated	<p>Counties Power suggests that types of developments covered by this NPS should be extended to included co-generation projects.</p> <p>While the list of energy sources is comprehensive in the "renewable electricity generation" definition, it is quite possible that some other renewable energy source is discovered during the life of this NPS. The definition should be extend to allow for this.</p>
			Policy 4	Conditional support	Amend wording of 4(i) to conclude "...renewable electricity generation and renewable electricity generation activities"
			Policy 5	Conditional support	<p>Amend wording of policy 5 to conclude "...renewable electricity generation and renewable electricity generation activities."</p> <p>Counties Power asks the Board to consider whether it could usefully be made even clearer that the intent of policy 5 is to enable customers and developers to use small renewable generation, rather than to enable local authorities to require its use.</p>

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79	Royal Forest & Bird Protection Society Inc.	Yes	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> <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 nature</p> <p>Submits that Central government has shown a lack of action in proactively providing for national networking in the 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 2. Limitations to growth in the physical environment, i.e. ensuring no decline in biodiversity 3. Ensuring consistency with energy conservation directives as the first choice 4. Consistency with other national policy directions, strategies, and plans 5. Better integration of electricity generation 6. Decoupling of electricity growth from economic growth 7. Greater responsibility on primary industry to look at using waste/methane, etc streams as opportunities for generation.
			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>

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			Policy 2	Oppose	<p>Forest and Bird is fundamentally 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	<p>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.</p>
			Policy 4	Conditional support	<p>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.</p>
			Policy 5	Conditional support	<p>Forest and Bird supports community initiatives and distributed generation. Submits that this should not, 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	Yes	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> <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	<p>Submits that there needs to be a specific, fixed, and quantified 'Energy Budget' limit to electricity generation.</p>
			Policy 1	Conditional support	<p>Submits that the word 'increasing' should be removed from this policy.</p>
			Policy 2	Support	<p>Generally agrees with the wording of policy 2.</p>
			Policy 3	Support	<p>Agrees with policy 3.</p>
			Policy 4	Support	<p>Agrees with Policy 4.</p>

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			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.
81	Leyland, Bryan	Yes	General comments	Oppose	<p>Submits that the objective is unachievable because, due to a shortage of storage, hydropower will always need backup from thermal generation in all but an unusually wet year. On top of that, wind power is seasonal and it is intermittent, unpredictable and more expensive than most forms of conventional generation.</p> <p>Submits that the NPS is based on a belief that the world is warming due to man-made greenhouse gases -- which the submitter considers is not true. The submission provides data to support this statement - refer to submission for details.</p> <p>Overall concludes that "the NPS is totally unnecessary. Submits that Man-made greenhouse gases do not cause global warming, the world is cooling and is likely to continue to cool. Therefore submits that there is no need to spend money and effort on promoting renewable energy because it will simply be a futile attempt to solve a problem that does not exist."</p>
82	Environment Bay of Plenty	Yes	General comments	Not stated	<p>The council is concerned that the NPS could work against initiatives to implement alternatives to generated energy. The NPS is generation-focussed and is not holistic enough to include a reduction or diversion of energy demand. Suggests that alternative methods to reduce electricity demand should also be promoted. Would like the NPS to provide stronger direction to allow for sites which generate electricity to be able to feed electricity back into the national grid.</p> <p>NPS does not address the issue of priority when there are competing uses for resources (for example, the use of water for hydro-electricity generation and irrigation).</p> <p>Highlights that central government would need to provide additional resources to cover any additional responsibilities required of regional councils by the implementation of the NPS. Considers there has been no consideration by Government of the cumulative costs and the lack of efficiency and effectiveness of these national directives on local authorities and their communities.</p>
			General comments	Not stated	<p>Considers that if central government continues to require mandatory review and changes to local authority planning frameworks to implement national directives, it should enable local authorities within this NPS to do so in the most efficient and effective way, for example by enabling local authorities to implement the NPS exempt from processes required in Schedule 1 of the Resource Management Act (1991).</p> <p>Encourages the development of a non-regulatory tool to support small and community-scale renewable electricity generation development and operation (please see "Recommendations on policy and process for renewable electricity generation activities" below).</p> <p>Considers it is imperative that the Ministry for the Environment releases a guidance manual on resource management standards for renewable electricity generation to accompany this NPS.</p> <p>Proposes a new Policy - requiring local authorities to assess their policy statements and plans for the implementation of above policies. Refer to submission for more details.</p>

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			Policy 4	Conditional support	<p>Submits that Policies 4 and 5 should remain guiding principles and not require unnecessary plan changes or variations. Suggests that the operational policy element relating to plan changes, proposed plans or variations should be a separate policy, Policy 6.</p> <p>Considers Policy 4 lacks guidance of how it should be implemented practically. It should be noted that there is a variety of ways of generating electricity renewably.</p> <p>Proposes the following wording change to Policy 4: "Local authority policies and plans should enable the identification of renewable electricity generation possibilities, including activities associated with: 1. The identification and assessment by recognised generators (or qualified researchers) of potential sites and energy sources for renewable electricity generation. 2. Research-scale investigation into emerging renewable electricity generation technologies and methods."</p>
			Policy 5	Conditional support	<p>Submits that Policies 4 and 5 should remain guiding principles and not require unnecessary plan changes or variations. Suggests that the operational policy element relating to plan changes, proposed plans or variations should be a separate policy, Policy 6.</p> <p>Considers that relying on local authorities to establish methods of measuring and assessing effects and considering project proposals would create uncertainty in the marketplace, be time-consuming and lead to inadequate assessments. Considers Central government should provide guidance on this.</p> <p>Submits that the use of a threshold to define generation as "small and community-scale" may be an inadequate control as it does not preclude sub-standard or inefficient technology that could have a detrimental environmental impact.</p> <p>Proposes the following changes of wording to Policy 5: "Local authority policies and plans should support small and community-scale distributed renewable electricity generation."</p>
83	Sustainable Electricity Association New Zealand	Yes	General comments	Conditional support	<p>Supports in general a NPS supporting a renewable electricity generation objective, but has some concerns about the combined effects of the Policies.</p> <p>Concerned that there is no mention of a role for Photo Voltaic (PV). Strongly urges that documentation supporting the NPS recognise a role for solar PV</p>
			Policy 2	Conditional support	<p>Concerned that policy 2 may "tip the balance" against the preservation of remaining areas of natural and physical uniqueness. Thinks there should be a counter balance which elevates the effects of the loss of natural diversity within the country as a whole through renewable energy projects to more than minor, even if the development represents a less than minor local environmental effect.</p>
			Policy 3	Conditional support	<p>Considers the reversibility policy is desirable if it establishes only marginal preference for a reversible scheme over a non-reversible scheme. However submits that it must not be used as a reason to suppress other tests of acceptability. Considers that Policy 2 and Policy 3 combined may result in a persuasive argument to exploit the resource irrespective of that remaining unmodified nationally.</p>
			Policy 4	Conditional support	<p>Submits that this policy should be helpful, and supports it. Considers it needs to particularly include policies to support access to local resource knowledge for application or renewable electricity generation at all scales, down to individual customer-generator level (Policy 5).</p>

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			Policy 5	Conditional support	Specifically supports the inclusion of Policy 5. Recommends the following additions: ... taking particular regard to small-scale renewable electricity generation attributes: (i) low environmental impact and high level of reversibility (ii) reduced losses and deferment of large scale infrastructure (ii) individual access to a renewable alternative to grid-mix electricity supply.
84	Northland Regional Council	Yes	General comments	Not stated	Supports the development of renewable electricity generation but not for the same purpose as identified in the NPS. Considers the NPS is inappropriately focused on a 90% target when the focus should be clearly providing for sustainable community and regional scale development. Considers the NPS should be part of a broader approach focusing on reducing energy use, adopting more efficient technology, co-generation initiatives and economic barriers. This should be reflected in the pre-amble and objective.
			Policy 4	Conditional support	Submits that if the intention of Policy 4 is to enable activities associated with the identification and investigation into commercial sites then the NPS should clearly state how this is to occur and identify policies to make it happen.
			Policy 5	Conditional support	Submits that if the intention of Policy 5 is to enable activities associated with the development and operation of small and community scale generation, then the NPS should clearly state how this is to occur and identify policies to make it happen. In the council's opinion the definition of small and community scale distributed renewable electricity generation should not include a MW limit. The focus should be on whether the project provides for community scale generation as opposed to a significant contribution to the national demand.
85	West Coast Regional Council	No	General comments	Not stated	Disappointed that the NPS as currently worded has not provided the greater certainty that was its stated aim in the preamble - " a nationally consistent approach to balancing competing values associated with the development of New Zealand's renewable energy resources will provide greater certainty to decision-makers, applicants, and the wider community. Submits that the NPS should be enabling and state clearly that renewable electricity generation is appropriate development except in certain circumstances.
			Policy 1	Support	Supports Policy One as it identifies that all renewable electricity generation activities are of national significance.
			Policy 2	Oppose	Submits that policy 2 does little more than confirm current resource consent assessment practice and does not provide national direction. Recommends deleting Policy 2.
			Policy 3	Oppose	Does not support Policy 3. Considers it is rather short sighted to be ruling out energy options that have a relatively long lead in time to develop.

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			Policy 4	Oppose	<p>Policy 4 is not supported as the council considers an NPS should not be timeframed as this creates unnecessary cost for little benefit.</p> <p>Recommends amending Policy 4 so it becomes a statement such as: "It is appropriate that the following are encouraged: - the identification and assessment by generators of potential sites and energy sources for renewable electricity generation. - research-scale investigation into emerging renewable electricity generation technologies and methods."</p> <p>If the above decision request is rejected then the council submits that any timeframe in the policy is deleted.</p>
			Policy 5	Conditional support	<p>Policy 5 is not supported by the council for similar reasons to Policy 4.</p> <p>Recommends amending Policy 5 so it becomes a statement such as: "activities associated with the development and operation of small and community-scale distributed renewable electricity generation are to be encouraged."</p>
86	King, David	Yes	General comments	Not stated	<p>Comments that it's a little disappointing that the effects of deliberate improvement of utilisation efficiency is not included, since there is no doubt that this approach would be more economic than merely providing more generation capacity. Would like to see a policy devoted solely to this aspect of power demand being studied.</p> <p>Seeks the following changes to the interpretation section: Add osmosis into the interpretation section (refer to Mr King's submission for proposed definition).</p> <p>Refer also to the Appendix accompanying this submission. The Appendix outlines a summary of various options.</p>
			Policy 1	Support	Endorses this policy fully. Considers it is essential for honouring New Zealand's obligations under the Kyoto Protocol.
			Policy 2	Not stated	Submits that the national grid where necessary should be reinforced to encourage renewable generation. Considers this should be the major consideration for every new generation option, and is another benefit of a Feed in Tariff option.
			Policy 3	Support	Endorses this policy but observes that reversibility of many civil engineering installations should not be a "sine qua non." Considers, for instance, that shore based wave generation installations will be no more reversible than hydro dams.
			Policy 4	Support	Sees no objection to Policy 4, but observe that research scale investigations (ii) should be a priority.
			Policy 5	In Part	Submits that Policy 5 should include a Feed In Tariff (FIT).

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88	Meridian Energy Limited	Yes	General comments	Not stated	<p>Overall Meridian supports the establishment of a NPS on renewable electricity generation. However, Meridian considers that as currently worded, the proposed NPS fails to provide the necessary guidance.</p> <p>Meridian considers the proposed NPS fails to fulfil its purpose. Meridian submits that the difficulty which the NPS needs to address is the competing value judgements which are required under Part 2.</p> <p>Submits that the NPS needs to specifically protect the generation output of existing renewable electricity generation activities, and therefore, avoid the need to generate replacement renewable energy.</p> <p>Meridian considers the focus of the NPS on small scale and untested marine generation will not enable the achievement of the 90% target.</p> <p>Submits that it is incorrect to assume that adverse effects are proportional to the amount of generation output.</p> <p>Considers the proposed NPS will not assist decision-makers decide where the balance between renewable energy benefits and (for example) adverse amenity effects lie.</p> <p>Meridian considers it important that the NPS should also recognise the need to facilitate connection to the national grid from renewable generation projects, so that the intention of carrying energy from the point of supply to demand is fully realised across the Renewables NPS and the Transmission NPS.</p> <p>The NPS does not adopt a zoning approach to renewable electricity development - Meridian supports this position.</p> <p>The NPS does not contain any reference to the need to recognise reverse-sensitivity effects - such effects can pose significant issues for existing renewable generation infrastructure. Meridian proposed a new policy to address this issue.</p> <p>Meridian requests specific changes to the 'preamble' and 'matter of national significance' sections of the NPS. Refer to pages 23 and 24 of Meridian's submission for these changes.</p> <p>Meridian also requests specific amendments are made to existing policies and proposes new policies. Refer to pages 36 - 41 for additional policies and Appendix B of Meridian's submission for a full version of its revised NPS.</p>
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			Objective 1	Conditional support	<p>Meridian generally supports the approach taken in the proposed Objective.</p> <p>Wishes to emphasises that it is crucial that existing electricity generation capacity from renewable sources is not diminished if New Zealand is serious about achieving the 90% target.</p> <p>Considers the objective needs to more clearly set out the need to specifically protect the generation output of existing renewable generation activities.</p> <p>Considers the objective should focus more explicitly on achieving the 90% target as the primary point of the objective.</p> <p>Considers the objective would be strengthened, and more focussed on the main issue raised in the Preamble if the primary point of national significance relates to the achievement of the 90% target.</p> <p>Meridian has requested specific amendments to the objective. Refer to pages 25 - 26 of Meridian's submission for suggested amendment.</p>
			Policy 1	Conditional support	<p>Meridian generally supports the intention of Policy One.</p> <p>Believes the NPS should not only direct decision makers to recognise renewable generation benefits, but also provide for these benefits. This would ensure those benefits are actually given effect to, and ensure consistency with language used in the NPS for Electricity Transmission.</p> <p>Does not support the inclusion of the reference to "renewable electricity generation activities, at any scale" and requests changes to reflect that the national significant benefits of electricity generation activities may occur individually in some cases and cumulatively in others.</p> <p>Considers the list of benefits should be more comprehensive, without being exclusive. Seeks inclusion of a reference to the importance of developing and using electricity from domestic, naturally renewable energy resources, rather than those imported into New Zealand.</p> <p>Considers it is appropriate for introductory language "in achieving the purpose of the Act" to be employed in this policy and many of the following policies.</p> <p>Meridian requests specific amendments to policy one, Refer to page 27 of Meridian's submission for requested amendments.</p>
			Policy 2	Conditional support	<p>Meridian generally supports policy 2.</p> <p>Considers it important to inform decision-makers about the real, practical constraints associated with the development of electricity generation from renewable resources. However, Policy 2 only refers to potential conditions of consent to avoid, remedy or mitigate environmental effects. The policy does not refer to the initial decision as to whether or not to grant consent.</p> <p>Refer to page 28 of Meridian's submission for the specific amendments Meridian requests to Policy 2.</p>

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			Policy 3	Oppose	<p>Meridan does not consider it reasonable or valid for the NPS to specify " relative reversibility" as a mandatory consideration and seeks the deletion of this Policy.</p> <p>Meridan considers there is no scientific, legal or rational basis for the inclusion of this policy. Refer to pages 30 - 31 of Meridian's submission for further information.</p>
			Policies 4 and 5	Conditional support	<p>Meridan generally supports Policy 4 and broadly supports Policy 5. Considers it useful for plans to encourage and facilitate investigation and assessment of possible sites and technologies for renewable generation (but does not support zoning to facilitate this).</p> <p>Does not consider Policy 4 is sufficient in directing local authorities as to the changes they will need to make to their policy statements and plans.</p> <p>Consistent with amendments it seeks to the Objective, Meridan seeks that the NPS require local authorities to amend their district and regional plans to provide for controlled activity status for minor upgrades to, and the renewal of resource consents for, existing renewable electricity generation activities, in order to protect their continued generation output.</p> <p>Meridan requests that policies 4 and 5 be replaced with new policies. Refer to pages 34 onwards for suggested new policies.</p>
89	Federated Farmers	Yes	General comments	Oppose	<p>Does not support the establishment of a NPS on renewable electricity generation.</p> <p>Considers the NPS will take away private property rights.</p> <p>Considers that it is impossible for a NPS to provide adequate direction on competing use issues.</p> <p>Considers the consultation process for the proposed NPS is inadequate.</p> <p>Considers the section 32 analysis is inadequate as it does not include the status quo as an option or consider the impacts on the NZ farming sector.</p> <p>Although it does not endorse the ETS in its current form, believes that the scheme, plus a ban on thermal generation, already provides sufficient incentive for the renewables sector.</p> <p>Considers the NPS should consider the impacts of new transmission infrastructure and that compensation measures should be explicitly provided for.</p> <p>Recommends the effects of transmission lines must be taken into consideration and compensated for accordingly.</p> <p>Recommends the consent making decisions be left to local authorities per the status quo.</p> <p>Supports small and community scale projects but does not consider that an NPS is the best way to provide for them.</p> <p>Recommends that section 166 not be extended to generators.</p> <p>Considers non-statutory guidance to be an appropriate option for the Ministry to pursue.</p>
			Objective 1	Not stated	<p>Considers that the NPS should consider the impacts of new transmission infrastructure and that compensation measures should be explicitly provided for.</p>

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			Policy 1	Oppose	<p>Considers it inappropriate to elevate renewable energy projects to a "nationally significant" status in the proposed NPS.</p> <p>Considers there is already adequate provision for the "national Interest" in the RMA as it currently exists.</p>
			Policy 2 - practical constraints	In Part	<p>Considers the NPS ignores a vital practical constraint - the impacts from necessary transmission lines that will accompany the project must be considered.</p> <p>Recommends the NPS should consider the impacts from necessary transmission lines, as well as appropriate compensation for the project.</p>
			Policy 3	Not stated	<p>Recommends that the effects of transmission lines must be taken into consideration and compensated accordingly.</p> <p>Is currently of the view that it is appropriate to assume technology will bring about renewable energy sources whose effects can be erased and the land returned to its pre-development state.</p>
			Policy 5	Oppose	Supports small and community scale projects but does not consider that an NPS is the best way to provide for them.
91	New Plymouth District Council	Yes	General comments	Not stated	<p>Supports the notion of renewable electricity generation but does not consider the section 32 evaluation is an accurate reflection of alternatives, nor of the true implications for territorial authorities.</p> <p>Considers that section 7(j) in conjunction with the council's district plan more than adequately provide for certainty in relation to potential renewable energy projects within the district.</p> <p>Concerned that the section 32 evaluation has not considered the specialist training for staff and/or use of consultants that would be required to give effect to the NPS.</p> <p>The council would welcome guidance that clarifies that councils will not be required to identify potential renewable electricity generation sources within its district, but merely include objectives and policies within the district plan for specific consideration by decision makers.</p> <p>Considers the implementation of the NPS has potential to be controversial and result in appeals to the Environment Court in relation to changes to its district plan.</p> <p>Supports the inclusion of a common date to give effect to this NPS and the NPS on Electricity Transmission. However, notes the combined costs will put a considerable burden on territorial authorities.</p>
			Policy 1	Support	Supports the view with respect to Policy One, in that there is no direction for district plans to be changed or amended to give effect to the policy.
			Policy 2	Support	Supports the view with respect to Policy Two, in that there is no direction for district plans to be changed or amended to give effect to the policy.
			Policy 4	Conditional support	<p>The councils work programmes and budget will have to be reviewed to accommodate the work required to amend its district plan to give effect to Policy 4.</p> <p>Concerned with the use of the word "enabled" and the fact that there are a very large number of ways to generate electricity generation and a wide spectrum of potential effects.</p>

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			Policy 5	Conditional support	<p>Concerned that to give effect to policy 5 it will have to investigate technologies suitable for communities to give effect to this policy.</p> <p>Will also require specialist training for staff and/or use of consultants to give effect to the requirement for 'methods' within this policy.</p>
92	IPENZ Engineers New Zealand	No	General comments	Conditional support	<p>IPENZ considers it essential that this NPS is future proofed. To assist with this future proofing, IPENZ recommends that the NPS includes a provision for a regular review.</p> <p>Suggest the NPS includes a threshold whereby generators under that threshold are not eligible to be called-in.</p> <p>Given the existence of section 7(i) and (j), IPENZ questions the need for this NPS.</p> <p>Suggest amending the definition of renewable to include "future viable technologies", or words to that effect.</p> <p>Suggest the NPS include the following review clause: "The Minister for the Environment shall begin a review of this National Policy Statement no later than 10 years after its gazettal and every ten years thereafter."</p> <p>States that the NPS must not override the provisions of the Electricity Act 1992 Clause 62G, which allows the Minister of Energy to grant exemptions to fossil-fuelled generation in certain situations, such as emergencies.</p> <p>IPENZ notes that the proposed NPS does not state how the implementation will be monitored. It recommends that this detail be included to ensure the NPS meets its objectives.</p> <p>Supports the adoption of a generic NPS for electricity generation.</p> <p>IPENZ recommends that this NPS be accompanied by best-practice guidelines to assist consent authorities and decision makers in their assessments of renewable electricity generation projects.</p>
			Policy 1	Conditional support	<p>Considers that given the Policy 1 wording, there is potential for domestic wind turbines to be eligible for a Ministerial call-in. Suggests the NPS includes a threshold whereby generators under the threshold are not eligible to be called-in. For example a 10-megawatt threshold.</p>
			Policy 2	Not stated	<p>Concerned that when giving effect to Policy 2, councils and decision makers may begin to assume an expert role in matters of energy and electricity policy implementation. This task is likely to be beyond their capability and resources, and most definitely outside their role in both a local government and resource management context.</p>
			Policy 3	Not stated	<p>Concerned that policy 3 could have an adverse effect on hydroelectric projects.</p> <p>Also concerned that this policy requires local authorities to have considerable expertise in the various generation technologies and may be outside their area of capability.</p>
93	Reilly, Shaun	No	General comments	Not stated	<p>Strongly supports the amendment of the following RMA sections:</p> <ul style="list-style-type: none"> - section 6 to give recognition to the importance of national interests; - section 166 to give recognition to electricity generation. <p>Considers it advisable to acknowledge the benefits of waste to energy.</p> <p>Considers the systems whereby the local generating company can control all aspects of the supply chain to the local consumer must be brought back into the control of one authority.</p>

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94	TrustPower	Yes	General comments	Conditional support	<p>Trustpower supports the vision and objectives of the NPS but has a number of concerns with the way it is currently drafted. In particular, that is will unnecessarily restrict hydroelectric power generation development and enhancement projects within New Zealand. Concerned that the NPS may also create additional impediments to the consenting and/or development, expansion or enhancement of TrustPower's existing hydroelectric power generation assets.</p> <p>TrustPower considers that the NPS should be extended to specifically include statements regarding existing renewable electricity generation infrastructure and the consenting and/or enhancing of the same.</p> <p>TrustPower notes that it is becoming an increasingly difficult, time consuming and costly process to consent existing infrastructure.</p> <p>TrustPower suggests that it would be appropriate to consider providing for the consenting of existing renewable infrastructure as a controlled activity, thus providing security of investment and certainty to existing generators and operators.</p> <p>Further, decision makers should be guided to have particular regard to the existing environment, which should be defined as 'the environment that exists with the electricity generation infrastructure in place.'</p> <p>TransPower considers that guiding decision makers to have particular regard to the existing environment will, amongst other things, assist with the processing of resource consent applications associated with existing infrastructure.</p>
			Objective 1	Support	TrustPower supports the objective of the NPS and recommends it be retained without amendment.
			Policy 1	Conditional support	<p>TrustPower considers that Policy One could be further strengthened by clarifying, or extending, the list of benefits associated with renewable electricity generation.</p> <p>Refer to section 2.2.2 (pages 4 -5) for TrustPower's proposed amendment.</p>
			Policy 2	Conditional support	<p>TrustPower concurs that renewable electricity generation projects are often constrained by the nature and location of the renewable energy source etc.</p> <p>TrustPower considers, however, that securing access to land is also key to the development of renewable electricity generation. Considers that Policy 2 should be expanded to provide direction to the removal of barriers of access to land. Notes that barriers to access, particularly with respect to conservation estate land, often present significant impediments to renewable electricity development.</p> <p>TrustPower suggests the the Crown should advocate in support of land access, or at the very least ensure that barriers to access are not compounded by restrictive regional and district planning provisions.</p> <p>Based on these comments, TrustPower seeks amendments to Policy 2. Refer to section 2.3.2 (page 6) of Transpower's submission for the relief sought.</p>

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			Policy 3	Oppose	<p>TrustPower considers that Policy 3 should be deleted in its entirety.</p> <p>TrustPower submits that Policy 3 is not consistent with the vision and objective of the NPS as it will significantly restrict hydroelectricity generation development, enhancement and consenting of existing hydroelectric power generation schemes.</p> <p>Considers Policy 3 unnecessarily increases the cost associated with consenting and consenting of hydroelectric power generation infrastructure by making it more difficult to argue for and ultimately obtain viable resource consent conditions for the same.</p> <p>Notes that the RMA already provides appropriate tests for assessing the adverse effects environmental effects associated with generation proposals within Sections 104B and D, thus Policy 3 is not required.</p>
			Policy 4	Conditional support	<p>Supports the intent of Policy 4, however questions the practicality of such a policy. Considers Policy 4 appears to suggest that local authorities should promote the identification of possible sites for new renewable electricity generation.</p> <p>Concerned that, unless carefully implemented, the identification of possible sites for development could lead to a preference being established for existing technologies. Such an outcome would not be in accordance with part (ii) of Policy 4.</p> <p>Concerned that along with being both costly and time consuming the development of specific areas in which renewable electricity generation development is to occur may lead to increased competition between generators.</p> <p>TrustPower considers it is more appropriate for local government to highlight areas of constraint in their regional and district plans, such as areas supporting significant environmental values and/or sensitive areas.</p> <p>Based on these comments, TrustPower seeks amendments to Policy 4. Refer to section 2.5.2 (pages 8-9) of TrustPower's submission for the relief sought.</p>
			Policy 5	Conditional support	<p>TrustPower supports the intent of Policy 5 and notes that such a Policy may go some way to encouraging developers to pursue small scale renewable electricity generation proposals.</p> <p>TrustPower, however, considers the definition of small-scale should be amended. Suggests defining small scale as projects that have an installed generation capacity of 10MW or less. This definition is consistent with the electricity generation market definition of small scale.</p> <p>Considers Policy 5 could be strengthened to recognise the national significance of all renewable electricity generation proposals. Considers the NPS needs to recognise that the cumulative benefits of small-medium scale proposals should be considered as nationally significant.</p> <p>Based on these comments, TrustPower seeks amendments to Policy 5. Refer to section 2.6.2 (page 10) of TrustPower's submission for the relief sought.</p>
			New Policy	Not applicable	<p>TrustPower proposes that a new policy be inserted into the NPS as follows:</p> <p>"When considering proposals to enhance existing renewable electricity generation activities, decision makers must have particular regard to:</p> <ul style="list-style-type: none"> (i) the benefits associated with maintaining or enhancing the existing generation capacity; and (ii) the existing environment.

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95	Central Hawkes Bay District Council	No	General comments	Not stated	<p>The council supports in principle the aims of the policy in that processing consents through the RMA for Renewable Electricity Generation for the benefit of New Zealand should be made easier.</p> <p>Opposes the proposed costs to local government and the ratepayers of its district.</p> <p>Believes central government should carry the full cost of the proposed policy implementation.</p>
96	Environment Waikato	Yes	General comments	Conditional support	<p>The council considers that with this proposed NPS, New Zealand has missed an opportunity to consider the wider benefits of the direct use of energy from renewable sources. Although the council understands the rationale for limiting the proposed NPS to electricity generation, in some cases - especially geothermal energy - the direct use of heat either industrially or domestically is considered more efficient, and this may be compromised by the NPS through a perceived preference for electricity generation.</p> <p>Notes the identification of \$260,000 of government costs, strongly recommends the government commit this initiative in the form of web-based guidance as part of the Quality Planning website.</p> <p>Submits that the term "renewable electricity generation" be replaced with the more meaningful term " electricity generated from renewable sources."</p>
			Objective 1	Conditional support	<p>The council considers it is inappropriate to include the 90 percent target in a NPS under the RMA. The council submits that the objective should only relate to those outcomes that are able to be achieved through the mechanisms available under the Act.</p> <p>Recommends that the reference to the target be removed from the objective and shifted to the preamble.</p>
			Policy 1	Support	<p>The council supports the reference to all scales of generation as the cumulative benefits of many small scale projects can assist the national energy objectives.</p>
			Policy 2	Conditional support	<p>The council notes that Policy 2 specifically refers to consent authorities. It supports the need for policy to address matters in subsections i,ii,iii & iv as it will take time for policy to 'tip the balance in favour of renewable energy projects' to be developed through subordinate plans and policies.</p> <p>Notes that the wording "particular regard" mirrors section 7 of the RMA. Yet consent authorities are only required to have regard to a NPS under section 104(1)(b)(i). The council finds this confusing and seeks clarification of this wording.</p>
			Policy 3	Conditional support	<p>The council supports the intent of Policy 3, however considers that the reference to 'technologies' may be confusing as similar technologies may have differing effects and differing degrees of reversibility depending upon the location. Advocates for the use of the term 'proposals'</p>
			Policy 4	Conditional support	<p>Notes that this policy has two components, a substantive and a process part. The council submits that it would be less confusing if these elements were separated into two policies.</p>
			Policy 5	Conditional support	<p>In line with comments on Policy 4, submits that the process component of policy 5 should be separated from the substantive policy component and that an additional Policy be developed to cover the expected time of sub-ordinate RMA policy and plan documents.</p> <p>Supports the requirement to support small and community scale renewable electricity generation, but considers this will not have an impact if there are barriers in place preventing the sale of electricity back through networks at times of excess generation.</p>

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97	Manukau City Council	Yes	General comments	Not stated	<p>The focus of the proposed NPS has changed from Renewable Energy to renewable Electricity Generation. MCC considers that this NPS is an opportunity that should not be wasted by narrowing its focus.</p> <p>The use of an NPS for the delivery of a more sustainable electricity system in NZ suggests that the Councils are entirely responsible for the delivery of this aim under the RMA. This responsibility should be shared with Government and both state and private enterprises.</p> <p>Monitoring of the success of the NPS should be administered by a central agency.</p> <p>It is recognised that ongoing quality planning advice would be useful.</p> <p>There are 2 definitions that MCC would like the Board to consider amending: "Renewable electricity generation" "Small and community-scale distributed renewable electricity generation."</p>
			Objective 1	Conditional support	Manukau City Council suggests that the 90% target be deleted and replaced with outcomes identified under the RMA.
			Policy 1	Conditional support	<p>This may need to be a two tier policy with the second tier focussing on the benefits/outcomes required from each of the energy domains from which renewable electricity is to be generated.</p> <p>Delete (i) and (ii) and replace with benefits to be achieved from each renewable energy source for electricity generation.</p> <p>This could be supported with a table of benefits and constraints of different technologies.</p>
			Policy 2	Not stated	MCC is not sure how necessary Policy 2 is.
			Policy 4	Conditional support	<p>Remove the date from the policy, as many local authorities are currently within a process of reviewing their first generation district plans.</p> <p>Define the term 'generators' and 'research-scale investigations'</p>
			Policy 3	Not stated	<p>If the purpose of this policy is to avoid large hydro dams then it should say so and not avoid the issue.</p> <p>If necessary, this policy could be added into policy 1 where the benefit of easily removed structures may be considered better than other types of renewable energy (i.e. wind turbines are easy to remove with no effect left on the environment).</p> <p>MCC recommends deleting this policy and rewriting it to focus on what is really behind it.</p>
			Policy 5	Conditional support	<p>It is considered that this policy should be revised to limit discretion regarding whether certain activities are permitted, controlled, or otherwise.</p> <p>Support in the form of funding that should come from central government.</p> <p>The focus on community owned facilities could have the negative effect of having more inefficient generation, piecemeal delivery and more environmental impacts.</p> <p>Delete the date from Policy 5.</p>

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98	Cardno TCB	No	General comments	Not stated	<p>Cardno TCB Ltd generally supports the proposed NPS. It considers that the NPS will no doubt provide the opportunity for national consistency in the assessment of renewable electricity projects during the resource consent processes.</p> <p>Cardno would have concerns if the proposed NPS were used to elevate the weight of section 7(j) over the other matters in section 7.</p>
			Policy 1	Support	Cardno TCB Ltd generally supports Policy 1.
			Policy 2	Conditional support	<p>Cardno considers that a NPS should not infer that any potential measures to avoid, remedy or mitigate adverse effects need not be provided by a proposal simply due to the likelihood of there being constraints to achieving such measures based on the type of proposal or location of the proposal.</p> <p>Cardno considers that the first bullet point item of Policy 2 should be deleted or substantially amended to provide better clarity of intention.</p>
			Policy 3	Conditional support	Cardno supports Policy 3. However, considers the wording needs to be amended to better reflect the policy's intention to consider reversibility / removal / reuse etc. of the generation facility itself and the associated infrastructure.
			Policy 4	Support	Cardno supports Policy 4.
			Policy 5	Conditional support	<p>Cardno supports Policy 5. However, considers the wording of the policy needs to be improved.</p> <p>Recommends that policy 5 is amended to better reflect the policy's intention to support small and community-scale renewable electricity generation projects by removing the term "distributed".</p>
99	Whangarei District Council	No	General comments	Oppose	<p>The Council considers that the NPS will have a disproportionate impact on planning tasks already undertaken by medium sized district councils when compared with better resource localities. Suggests that any intended support packages should be directed towards district councils with strong renewable resources.</p> <p>Overall, Whangarei District Council does not support the proposed National Policy Statement: Renewable Electricity Generation, and questions the value the statement will have as it is presently written. However, it does recognise that Renewable Electricity Generation is a significant issue in New Zealand and there is a desire by central government to promote development of this sector.</p>
			Policy 1	Support	The council sees the merits behind using Policy 1. It sees this policy as an aid to local resource consent decision-making and appreciates the method by which it does not require plan changes for implementation.
			Policy 2	Support	The council sees the merits behind using Policy 2. It sees this policy as an aid to local resource consent decision-making and appreciates the method in which it does require plan changes for implementation.
			Policy 3	Conditional support	The Council has concerns over Policy 3 as it presents something of a new direction for resource management by using 'reversibility' as an organising principle. To implement this policy, the council would expect that much in the way of guidance material needs to be prepared, and updated regularly due to technological changes, as this arena is likely to be fraught with debate.
			Policy 4	Conditional support	<p>Assuming that the decision is made to proceed with the NPS: Renewable Electricity Generation, the council requests the following amendment (or similar) to policy 4:</p> <p>"By 13 March 2012, local authorities with significant renewable electricity generation potential are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to enable activities..."</p>

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			Policy 5	Conditional support	Assuming that the decision is made to proceed with the NPS: Renewable Electricity Generation, the council requests the following amendment (or similar) to policy 5: "By 13 March 2012, local authorities with demonstrable community renewable electricity generation needs are to notify, in accordance with Schedule 1 of the Act..."
100	Powerco	Yes	Objective 1	Conditional support	Powerco supports the proposed objective subject to removing the reference to the 90% target. It considers the inclusion of the target may blur the boundaries between the role of the Environment Court, the Electricity Commission and the electricity market.
			Policy 1	Conditional support	Powerco supports Policy One subject to the following amendment. Policy One (ii) be reworded to read: "Contributing" to the security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation. Powerco considers this presents a more accurate assessment of the role of renewable electricity generation because its often intermittent nature renewable generation will not always maintain or increase security of electricity supply.
			Policy 2	Conditional support	Powerco supports Policy 2 but would like to see the Policy extended to include the following clause: v. location of new electricity distribution assets. This would provide new electricity distribution assets with a degree of regulatory support in the same way the National Policy Statement on Electricity Transmission supports the national grid (defined as Transpower's assets).
			Policy 5	Conditional support	Powerco supports Policy 5 but would like to see the role of electricity distribution networks specifically recognised. Seeks Policy 5 to be amended to read: "By March 2012... to enable activities associated with the development and operation of small and community scale distributed renewable electricity generation including the extension or upgrading of electricity distribution networks"
101	Rotorua District Council	No	General comments	Oppose	The council considers that in its current form, the NPS is less about sustainable management, and more about the establishment of a framework that can deliver a more lenient approach to the assessment of environmental effects for renewable energy projects, compared with other activities. Considers the policies do little to address the imbalance between negative environmental effects that manifest locally and positive effects that manifest nationally. The council has a fundamental concern with the means being used for delivery of the NZ Energy Strategy targets; in particular, the elevation of a Section 7 RMA matter to the same status as a Section 6 matter via this NPS process.
			Policy 1	Oppose	The Council is opposed to policy One. If renewable energy is to be treated as a matter of national significance/ importance, then it would make sense that it appears in the RMA as a Section 6 matter, not Section 7.
			Policy 2	Oppose	The Council is opposed to policy Two. If renewable energy is to be treated as a matter of national significance/ importance, then it would make sense that it appears in the RMA as a Section 6 matter, not Section 7.

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			Policy 3	Oppose	The Council is opposed to policy three. If renewable energy is to be treated as a matter of national significance/ importance, then it would make sense that it appears in the RMA as a Section 6 matter, not Section 7.
			Policies 4 and 5	Support	The Council supports the intent of Policy 4 and will consider such matters during the current district plan review.
102	Wild Rivers Action Project	No	General comments	Conditional support	<p>Considers the purpose of the NPS should give at least as much weight to avoiding inappropriately sited projects and pursuing demand management (efficiency, conservation, cogeneration, distributed generation), as it does to easing the way for more renewable projects.</p> <p>Asserts that the statement re national benefits (new renewable generation) v local costs (re landscape) is incomplete. There are significant national costs such as impact on biodiversity, and the loss of wild rivers.</p> <p>Asserts there MUST be a statement about ecological protection in the NPS. This should have two parts: it should make clear which landscapes are out-of-bounds for all proposals and it should also have a statement about requiring proposers to site and configure proposals for minimum ecological impact from the beginning.</p> <p>Asserts there must be a statement that recognises the cultural, recreational and ecological values that NZers place on wild outdoor places, and the access and recreation opportunities in them.</p> <p>Considers there should be acknowledgement of the incompatibility of infinite growth in electricity demand and the finite nature of natural resources.</p>
			Policy 3	Support	Strongly support the reversibility clause -considers irreversible hydro-dams have a much greater environmental and landscape impact than relatively-reversible run-of-river, wind, geothermal, solar, tidal or wave, and are not a sustainable use under the RMA.
103	Christchurch City Council	No	General comments	Not stated	<p>The Council supports the need for the NPS and the need to provide for diverse electricity generation to ensure a reliable and consistent supply of electricity to the country which can be maintained into the future. However, the Council considers the NPS as presently written too vague to provide clear guidance to territorial authorities as to how to achieve it.</p> <p>Considers the NPS, as presently written is mainly concerned with ensuring the security of electricity supply. The Council submits that the NPS should also provide national guidance to ensure the natural environment from which electricity is generated is also protected and sustainably managed.</p> <p>The Council is concerned that the proposed NPS does not recognise or provide for direct renewable energy use (for example solar water heating). The NPS should encourage efficient energy use and provide for the direct use of renewable energy resources (instead of conversion to electricity).</p>
			Objective 1	Conditional support	<p>The council suggests amending the Objective to recognise the benefits of direct use of renewable energy and the potential adverse effects of additional generation capacity on our environmental, social, economic and cultural well-being:</p> <p>“To achieve 90 percent of New Zealand’s electricity generation being derived from renewable energy sources, while giving effect to the sustainable management of the natural and physical environment. This includes recognising the suitability benefits of direct renewable energy use and greater energy efficiency,” or similar.</p>

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			Policy 1	Conditional support	<p>Considers Policy One is unclear as to what it is trying to achieve - the Policy does not provide additional guidance to local authorities when attempting to assess the benefits of renewable electricity generation against other values.</p> <p>Recommends amending Policy 1 to read: “...Decision-makers must have particular regard to the national environmental, social,cultural and economic benefits relevant to renewable electricity generation activities. These benefits may include:...” or similar. (ii) State what the anticipated benefits are.</p>
			Policy 2	Conditional support	<p>The Council supports the intent of Policy 2, but is unclear as to how the Policy provides additional guidance to Councils. Requests the Policy be amended to read: “...generation activities, decision-makers must have particular...by: i. the location.... ii. the nature and location... iii. logistical or technical... iv. the location of existing... while providing adequate management of adverse effects,” or similar.”</p>
			Policy 3	Oppose	<p>The Council is unclear as to the intent of this Policy. If the Policy is meant to discourage certain types of generation schemes (for example large hydro schemes) this should be presented clearly. The Council is concerned that as presently written this Policy could set a precedence for generation schemes that are seen to have reversible adverse effects.</p> <p>Decision sought (i) Clarify the intent of Policy 3 or delete the Policy.</p>
			Policy 4	Conditional support	<p>The Council considers than Policy 4 would provide additional value if specific matters over which Councils could have discretion were identified. The Policy could also identify the investigation methodologies or technologies that Plans are to enable.</p> <p>Considers the terms “research-scale investigation” and “emerging technologies” require definition.</p> <p>Suggests that the specific timeframe to notify variations be removed and instead require that this occurs when Plans are next reviewed.</p> <p>Decision sought (i) Amend Policy to read: “Promote identification of renewable electricity generation possibilities” “When planning and policy documents are next reviewed or within the next 6 years (if this occurs first), local authorities are to notify...to enable activities associated with: (i)... (ii)... ...provided the adverse effects of such activities are avoided, reduced or mitigated,” or similar.</p>

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			Policy 5	Conditional support	<p>Supportive of a Policy that encourages electricity generation at a community scale, however suggests that the Policy should provide guidance to what activities Councils limit their discretion over when assessing small and community-scale electricity generation.</p> <p>Considers that small and community-scale generation be defined by the relative scale, intensity and environmental impact of the activity. Supports the definition suggested by ECan where: “Small and community-scale distributed renewable electricity generation” means electricity generation from a renewable source, for the purpose of supplying electricity to a particular site or an immediate community via the local transmission lines, and where the adverse effects of the generation activity are minor or less than minor.</p> <p>Suggests that the specific timeframe to notify variations be removed and instead a reference made to when Plans are next reviewed.</p>
104	Greater Wellington Regional Council	Yes	General comments	Not stated	<p>Notes that the proposed NPS only relates to renewable electricity generation. It does not provide national policy direction on the wider issue of ‘energy generation’ from renewable resources.</p> <p>Believes that the terms used in the NPS and the Act should be consistent. Therefore submits that the NPS refer to ‘electricity generated from renewable energy resources’.</p> <p>Concerned that the NPS contains a number of policies that do not make it clear how they are to be given effect to and/or appear to deal with matters outside the scope of resource management decision making.</p> <p>Believes that consideration should be given to the use of section 55 (2A)(b) of the Act, where a national policy statement can direct that specific provisions be included in a document, without notification or hearing.</p> <p>Has a number of concerns about the section 32 evaluation. These include: - The objective is not described as a resource management matter. The focus is on a government electricity target. Section 5 of the report does not ask if the objective is the most appropriate to achieve the purposes of the Act, as no alternatives to the objective are provided. - The analysis assumes that only one plan change will be necessary for each regional council. In its current form, the NPS is likely to require plan changes to three of Greater Wellington’s plans. -The analysis of ‘risks of acting or not acting’ does not include an examination of the level or certainty of information that is available and how that influences acting or not acting.</p> <p>Requests that the final NPS be accompanied by an implementation plan specifying the priorities for implementation and further guidance on responsibilities. The implementation plan should also specify what central government is going to be doing to implement the NPS.</p>
			Objective 1	Conditional support	<p>Concerned that the proposed objective includes both policy elements (seeking recognition and promotion) and a national target for electricity generation.</p> <p>Seeks further analysis as to whether the objective is the most appropriate to achieve the purpose of the Act. If the objective is considered to be appropriate, then Greater Wellington seeks:</p> <ul style="list-style-type: none"> • that the policy elements be removed from the objective; and • that the national energy target be replaced with a list and description, of the resource management outcomes sought be achieved.

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			Policies 1 and 3	Not stated	Considers that policies 1 and 3 do little more than repeat section 7(j) and 3 of the Act. Unsure what the NPS will actually achieve over and above what already exists, or could reasonably be expected to be provided for.
			Policy 1	Conditional support	<p>Greater Wellington seeks the following changes to policy 1:</p> <ul style="list-style-type: none"> • move the first sentence to the 'Matter of national significance'; • delete reference to decision-makers and instead list the type of decisions where policy 1 must be given particular regard (e.g. review of regional policy statements and plans, designations and resource consents); • limit the scope of policy 1 to 'national' benefits; • delete reference to 'any scale'; and • clarify and tighten the benefits, and assess whether other national benefits should be added. <p>Greater Wellington also seeks that the Board of Inquiry considers how additional national benefits will be communicated to local authorities.</p>
			Policy 2	Conditional support	Greater Wellington seeks that the intent of policy 2 be clarified (as currently written it can be interpreted several different ways) and that clause (ii) in its current form be deleted.
			Policy 3	Oppose	<p>Greater Wellington is unclear how policy 3 will add any value when resource management decisions are made. Reversibility is an effect which can already be considered when assessing effects in accordance with section 3 of the Act.</p> <p>Greater Wellington seeks that policy 3 be deleted.</p>
			Policies 4 and 5	Conditional support	<p>Concerned about the requirement (in policies 4 and 5) to notify by 13 March 2012 any changes to Greater Wellington's plans as this would incur unreasonable additional costs for Greater Wellington. Considers that a more appropriate approach would be to require councils to commence the process to amend plans, to implement the policies, on or before the date on which a council commences the review of its plans.</p> <p>Policies 4 and 5 require implementation through both regional policy statements and plans. Considers this to be an unnecessary and costly duplication of effort. Regional policy statements and plans have different functions and the policies need to target these differing roles.</p> <p>Greater Wellington seeks that:</p> <ul style="list-style-type: none"> • the reference to regional policy statements be removed from policies 4 and 5; • policies 4 and 5 list the specific activities to which a council should limit its discretion over to achieve the intent of "enabling", and describe the matters to which discretion should be restricted to; • the reference to notification in accordance with Schedule 1 of the Act, by 13 March 2012, be removed and replaced with reference to section 55(2A)(b) of the Act. <p>Greater Wellington also seeks that the Board consider whether a National Environmental Standard could be a more effective mechanism to achieve the intent of policies 4 and 5.</p>

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105	Horizons Regional Council	Yes	General comments	Not stated	<p>Considers the NPS as drafted will not add value to the current decision making process because the policies:</p> <ul style="list-style-type: none"> - in effect restate Section 7 of the RMA; - set out matters that are already considered in determining resource consent applications; - does not provide clear guidance on how consent authorities are to balance section 6 matters. <p>Consider that any final NPS must add value to current consent processes by helping decision makers balance competing values, not significantly tip the balance in favour of renewable energy at the expense of avoiding or mitigating environmental effects.</p> <p>Seeks clarification on the use of terms "decision makers" (in policy 1 and 3) and "consent authorities" (in policy 2).</p>
			Policy 1	Not stated	Considers that Policy One will not help decision makers balance competing values or evaluation of Section 6 and 7 matters.
			Policy 2	Not stated	Considers that Policy 2 deals with matters that are already considered by consent authorities when making consent decisions on these matters. Are unclear how this adds value to what already occurs.
			Policy 3	Not stated	Unsure that Policy 3 is of benefit to decision makers. Also concerned that this policy will potentially cause a bias away from some seemingly non-reversible generation technologies such as large scale hydro schemes that may be in other respects more appropriate than seemingly reversible generation such as wind turbines.
			Policies 4 and 5	Conditional support	<p>Generally supports Policies 4 and 5, however, are concerned that the costs to implement this policy will outweigh the benefits in its region.</p> <p>Also considers a plan change only be required where existing regional policies and/or plans do not give effect to this policy by the specified date.</p>
106	The Sustainable Energy Forum Inc	No	General comments	Not stated	<p>Overall supports the introduction of the NPS because SEF believes there is a large future for small embedded electricity generation and that there are several institutional barriers to entry for these systems of which the RMA is only one.</p> <p>SEF believes the NPS does not go far enough in that it may not weigh the impacts of climate change on the environment highly enough.</p>
			Policy 4	Not stated	Believes the wording of Policy 4 is too vague and unclear about what Councils are supposed to do. Suggests it would be better to develop one statement that all Councils could use rather than ending up with different statements in every plan.
107	Waipa District Council	Yes	Policy 1	Conditional support	Considers Policy One does not provide any real guidance on how to reconcile competing matters of national importance at a local level. To ensure consistency, some clarification or guidance is required.
			Policy 2	Conditional support	Accepts the premise that some adverse effects may occur that are assessed as being acceptable, however environmental effects must still be considered subject to Part II of the RMA. Would like to see some reference to Part II and the need to manage adverse effects be inserted.
			Policy 3	Oppose	Considers the concept of reversibility is too vague. Opportunities for renewable energy generation methods of the future may be limited unnecessarily, in addition to hydro generation being possibly disadvantaged in comparison with other methods when it may not be appropriate. Seeks to have this policy deleted or substantially clarified as to its intent.
			Policy 4	Conditional support	Seeks better definition of the scale and extent of the effects of the activities being enabled to be indicated as part of policy 4.
			Policy 5	Conditional support	<p>Would like to see this policy amended to be more specific as to the scale of effects envisaged in projects to be 'enabled'.</p> <p>Refer to submission for reasons.</p>

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108	Waitaha Resource Management Committee	Yes	General comments	Conditional support	<p>Waitaha is concerned that iwi and Maori organisations have not been invited to participate in the consultation process on the NPS.</p> <p>Waitaha supports the development of the proposed National Policy Statement on Renewable Electricity, on the basis that it provides:</p> <ol style="list-style-type: none"> 1. An opportunity to improve the of living environment for all New Zealanders 2. A vehicle to introduce the broader paradigm of renewable energy into a national policy document that reflects Maori issues, needs and aspirations; 3. A structural mechanism to positively influence the development of Regional and District Plans; and 4. A basis to inform decision making in respect to Resource Consent applications and hearings, in accord with Maori issues, needs and aspirations. <p>In support of the key components of the NPS, Waitaha recommends that:</p> <ol style="list-style-type: none"> 5. By introducing a Maori world view on issues such as sustainability will add value and provide for an integrated, holistic and values based approach 6. That Maori advice and input into the development of the NPS is critical to the enduring nature of the document; as Treaty partners and significant contributors to the sustainability of Renewable Electricity. <p>Waitaha support is provided that:</p> <ol style="list-style-type: none"> 7. The principles of Te Tiriti o Waitangi be embedded throughout the proposed National Policy Statement to give effect to it, and; 8. The Ministry for the Environment engages appropriate Maori input to ensure the Maori indigenous world view is provided for, appropriately and effectively. <p>Waitaha further recommends that:</p> <ol style="list-style-type: none"> 9. The Ministry for the Environment works closely with Maori at the national and regional level, and to seek iwi partnerships where appropriate, and 10. Consider how to strengthen internal Maori capacity and involvement within the Ministry to support such relationships. <p>Based on the above comments, Waitaha has provided a comprehensive table of suggested context and content of the NPS. submission for content.</p>
109	Local Government New Zealand	Yes	General comments	Not stated	<p>Suggests recognising the direct use of renewables in the preamble.</p> <p>Considers that further guidance on balancing competing values would be the best focus for national guidance.</p> <p>Considers the proposed policies do not guide or direct decision makers at any level or location towards a 'consistent' approach to their deliberations in 'balancing competing values.'</p> <p>Concerned over the significant resourcing issues and costs that will be incurred by the local government sector in implementing this NPS.</p> <p>Consider use of section 55(2a)(b)</p> <p>Considers a significant implementation package is required to facilitate and assist with the capacity raising necessary to support the implementation of the NPS.</p>

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			Objective 1	Not stated	<p>Considers the Objective should relate to the policy aim of the Proposed NPS - If the real aim of the NPS is to achieve reduced greenhouse gas emissions and security of supply then the Objective should say so.</p> <p>Suggests the 2025 target be removed from the Objective. The target itself is not something that can be achieved through a NPS under the RMA.</p> <p>The Objective needs to reflect what can actually be achieved through a NPS.</p>
			Policy 1	Conditional support	<p>Supports the intent of Policy One. However, does not think the policy as currently worded offers any value over what is already provided for in Section 7 of the RMA. This policy does not address the lack of clarity and certainty associated with having to reconcile potentially competing Section 6 and Section 7 matters.</p> <p>Suggests that this policy might also highlight the benefits associated with providing for 'reversibility' in renewable electricity generation activities. Building 'reversibility' in as a benefit to be considered by consent authorities would allow the deletion of Policy 3.</p> <p>Considers the policy needs to further define all the national benefits and perhaps provide a framework for decision making, including by prioritising the benefits able to be achieved by particular types or scale of activities or proposals.</p>
			Policy 2	Conditional support	<p>Requests that the intent of Policy 2 be clarified in accordance with the objective of the Proposed NPS. As written, it is variably interpreted within the local government sector. It is difficult to know what is reasonable, in terms of the expectations of decision makers, given the variable interpretations which might be made in implementing this policy.</p> <p>Considers it unlikely this policy will produce an easier resource management passage for any particular proposal in terms of running the consenting process – particularly as 'the measures' alluded to within the policy are unspecified and there is no guidance proffered about how to evaluate their relative merits.</p> <p>To ensure this policy is not an over-ride of any need to avoid remedy and mitigate adverse effects, LGNZ suggests the inclusion of 'provided there is adequate management of adverse effects' or 'while providing adequate management of adverse effects'.</p>
			Policy 3	Oppose	<p>Supports the intent of Policy 3 but considers it is not clear about what it is asking decision makers to do and will provide more confusion than provide guidance. Requests Policy 3 be removed from the Proposed NPS.</p> <p>If the concept of reversibility is to be retained, suggests that this be incorporated into Policy 1.</p>

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			Policy 4	Conditional support	<p>Seeks the removal of the date specification within Policy 4. Suggests 'at time of next review' is sufficient requirement.</p> <p>Suggests that any 'notification' must be based on a review of the existing regional policy statement or plans, and a finding that these do not adequately give effect to this NPS.</p> <p>Suggests Policy 4 should identify the type of 'identification', 'research', or 'investigation' activities, or techniques or equipment to be enabled in regional and/or district plans.</p> <p>Highlights a need to define "generators" and "research-scale investigations", and "emerging... technologies and methods" – otherwise all policy statements and plans will have to develop definitions and these may not be consistent.</p>
			Policy 5	Conditional support	<p>Considers that until further guidance is provided to councils on the actual technologies available and how they might provide for these better in their regulatory processes, this policy is not helpful.</p> <p>Seeks the revision of Policy 5 to ensure it provides clear direction to local authorities as to where and how to limit their discretion, or about what ought to be 'permitted', controlled (etc).</p> <p>Considers this Policy is unclear on what councils would need to do to enable activities associated with small or community scale distributed electricity generation from renewable energy resources.</p> <p>Suggests the Board consider providing for different degrees or scale of effects, as these apply in different operating contexts (city, town, rural-residential, rural) and for different types of electricity generation activities which might be expected in relation to Policy 5.</p>
			New Policy	Not applicable	<p>Suggests addition of a new policy relating to the process of policy statement/plan reviews.</p> <p>This policy could direct councils about notification of a plan change or variation, should the NPS require that local authorities do so by a particular date.</p> <p>This Policy could also address concerns about any need to notify in accordance with Schedule 1, having considered an ability to do otherwise as laid out in Section 55(2A)(b) of the RMA.</p>
110	Hawke's Bay Regional Council	Yes	Objective 1	Not stated	<p>Considers the objective is uncertain and confusing as it does not state a clear environmental outcome or desired environmental state.</p> <p>Objectives should be outcome focussed and measurable. Instead, the Objective mixes 'purpose' with 'how'. The 'how' (ie: "by promoting the development...") should be removed from the objective.</p> <p>Suggests the Board considers rewriting the Objective so it is clear, certain and outcome focussed. For example it could read "Promotion of development, upgrading, maintenance, and operation of new and existing renewable electricity generation activities as a matter of national significance so as to ensure that 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>

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			Policy 1	Conditional support	<p>Despite Policy 2, the council considers Policy 1 must be amended to enable all RMA decision-makers to have regard to the adverse effects of renewable electricity generation activities as well as beneficial effects.</p> <p>Considers the reference to “security of electricity supply” in Policy 1(ii) requires clarification as many decision-makers will be unfamiliar with this phrase.</p>
			Policy 2	Conditional support	<p>The Council supports the level of guidance provided in Policy 2, but is mindful that as currently written, Policy 2 may be misinterpreted as preventing consent authorities from requiring applicants to avoid, remedy or mitigate the adverse effects of their projects.</p> <p>Considers Policy 2 should be amended to ensure consent authorities are not prevented from ensuring consent applicants avoid, remedy or mitigate adverse effects on the environment of their REG activities.</p>
			Policy 3	Not stated	<p>Has concerns over the use of the term ‘Reversibility’ as it is not defined in the NPS, nor widely used in case law and is largely a theoretical concept.</p> <p>Suggests that if the Board considers that this concept should be retained, the Board should consider using references to “irreversible adverse effects” rather than “reversibility”.</p>
			Policies 4 and 5	Conditional support	<p>Considers it is unclear what objectives, policies and methods may be required to be introduced into an RPS and regional plans to ‘enable’ activities referred to in Policies 4(i) and (ii) and 5.</p> <p>Policies 4 and 5 should be qualified to only apply to an RPS and plans that do not already generally enable REG activities. This qualification would avoid imposing unnecessary costs on councils to change plans unnecessarily.</p> <p>Ideally, the NPS must provide guidance to clarify what type of plan provisions would or would not ‘enable’ REG activities. An NPS ‘implementation guide’ may be of some assistance.</p>
			General comments	Conditional support	<p>Interpretation Section:</p> <p>Considers the definition of ‘small and community-scale distributed electricity generation’ is unclear in relation to projects in the coastal marine area. The definition could be simplified by rewording the exclusion to refer to REG activities in the coastal marine area.</p> <p>Requests additional definitions of key terms used elsewhere in the NPS including: reversibility (if still to be used); security of electricity supply; enable; research-scale investigation.</p>

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111	Transpower New Zealand Limited	No	General comments	Conditional support	<p>Considers that the NPS recognise the need for connection to the transmission network and clarify how this NPS works with the NPS on Electricity Transmission. Refer to paragraphs 14 - 17 (on page 6) of the submission for reasons.</p> <p>Considers that the NPS should provide some guidance on how to balance competing interests eg. by guidance on how to achieve a consistent approach to the identification of environmental effects and parameters that might guide the assessment of effects within a particular landscape of context. Refer to paragraphs 23 - 24 on page 7 of the submission for more information.</p> <p>Considers that the NPS could better assist consistent local implementation of the NPS by providing guidance that bridges the gap between between high-level objectives and effective local implementation. Refer to paragraphs 25 - 30 (on pages 7 and 8 of the submission) for further information.</p> <p>Considers the NPS should recognise specifically that the adverse impacts of proposals must also be managed. Refer to paragraphs 23 - 24 (on page 7 of the submission) for reasons.</p>
			Policy 2	Conditional support	<p>Considers Policy 2 should be clarified to ensure that co-optimisation of transmission and generation investment should not disadvantage renewable generation proposals due to limitations on transmission or distribution.</p> <p>Refer to paragraphs 9 - 13 (on page 5) of the submission for reasons.</p>
			Policy 3	Oppose	<p>Considers Policy 3 is inappropriate as reversibility of adverse environmental effects is likely to create a barrier to some forms of renewable electricity and does not fit with the case-by-case RMA approach.</p> <p>Refer to paragraphs 18 - 22 (on pages 6 and 7) of the submission for reasons.</p>

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112	Fish and Game New Zealand	Yes	General comments	Not stated	<p>Fish and Game submits that this NPS, in its current format, fails to address a number of relevant matters such as Part II RMA considerations, which calls its appropriateness or potential effectiveness into question. It should be withdrawn or rejected until those matters have been appropriately addressed in a comprehensive fashion. It should not uncritically use terms such as 'renewable' loosely, when their effect on finite resources is anything but renewable.</p> <p>Considers the term 'finite renewable' should be recognised in an appropriate place in the NPS, if it is to be retained, and specifically should be included in the interpretation section (refer to page 9 of submission for proposed definition of finite).</p> <p>Highlights that rivers fall into two categories: - those rivers already dammed for energy generation are recognised as sources of 'renewable' energy - those rivers that remain free flowing are increasingly recognised within the non-renewable category.</p> <p>Submits that this unique distinction needs to be openly recognised in any NPS for Renewable Electricity Generation.</p> <p>See table on factsheet attached to Fish and Game's submission which records how long before the remaining stock of river-based hydro generation potential is exhausted given current and estimated future energy demand.</p> <p>Submits that the Section 32 Analysis does not consider all relevant matters of the Act as required. Considers an appropriate response would be to withdraw this NPS until a complete Section 32 analysis had been undertaken. Refer to page 4 of Fish and Game's submission for details.</p> <p>Considers that the preamble does not consider some of the other relevant aspects of Part II of the Act, including from Section 6 the maintenance and enhancement of public access (Section 6d), and from Section 7 clauses a - d and f - h. 24. Submits that reference to all potentially conflicting sections must be included and the NPS must resolve how a decisionmaker would address such conflicts.</p> <p>Submits that the matter of national significance should be re-cast as: 'the need to reduce carbon emissions from electricity generation and to promote, where adverse effects can be avoided, remedied or mitigated, energy demand reduction or non carbon-emitting electricity generation over other forms of energy generation.'</p>
			Objective 1	Conditional support	<p>Fish and Game submits that the objective should be deleted or amended as follows:</p> <p>'To recognise the national significance of electricity generation from non carbon-emitting sources, promoting those energy generation sources which are more reversible in their effects, while avoiding, remedying or mitigating 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>

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			Policy 1	Conditional support	<p>Fish and Game submits that policy should be amended as follows, or deleted:</p> <p>'Renewable electricity generation activities can be of national significance if they promote sustainable management. Decision-makers must have particular regard to the national, regional and local benefits and costs relevant to renewable electricity generation activities. These benefits may include, but are not limited to:</p> <ul style="list-style-type: none"> i. maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions ii. maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation. <p>Costs may include, but are not limited to:</p> <p>'effectively irreversible adverse effects on the environment or on matters outlined in Part II of the Act.'</p>
			Policy 2	Oppose	<p>Fish and Game submits that Policy 2 appears to exist to give undue weight to matters which would enable a consent authority to overlook actual or potential adverse effects of a proposal. Elevating the benefits of renewable electricity generation activities to national importance could tip the balance too far in favour of renewable electricity generation projects irrespective of the associated environmental effects. The NPS does not expressly recognise that there will be cases where the benefits of a renewable electricity generation project may not be sufficient to offset the associated environmental effects. An applicant would also be able to argue, under this policy, that avoiding, remedying or mitigating adverse effects would be impractical; the consequences of which would be unacceptable and would not promote sustainable management in terms of the Act.</p> <p>Considers that, in its present form, Policy 2 cannot be amended to remove its deficiencies. Fish and Game submits that it should therefore be deleted.</p>
			Policy 3	Conditional support	<p>Fish and Game submits that it is arguable that policy 3 supports development which minimises the potential for decisions to limit future options for the use and development of natural and physical resources and recognises that some renewable electricity generation technologies may be transitional.</p> <p>Considers that some statutory recognition that different types of electricity generation have different degrees of reversibility and that the more readily reversible should be favoured over the less reversible. This principle should be recognised in the NPS. However, the concept of reversibility is open to interpretation by both applicants and opponents in circumstances where it is not defined.</p> <p>Fish and Game supports the inclusion of this policy, provided it establishes a clear priority in favour of more reversible projects.</p> <p>This policy should be amended as follows:</p> <p>"When considering proposals to develop new electricity generation activities of the type covered by this National Policy Statement, to avoid those which have or are likely to have significant adverse effects which cannot be reversed, or which can only be reversed at high cost and/or over long periods of time decision makers must have particular regard etc"</p>

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			Policy 4	Conditional support	<p>Fish and Game submits that policy 4 appears to be intended to facilitate investigations by largely private energy companies. Fish and Game submits it should be amended as follows:</p> <p>By 13 March 2012, local authorities are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to consider activities associated with:</p> <p>i.the identification and assessment by generators of potential sites and energy sources for renewable electricity generation, which do not conflict with sites with known national or regionally significant resources</p> <p>ii.research-scale investigations into emerging renewable electricity generation technologies and methods.'</p>
			Policy 5	Conditional support	<p>Fish and Game recommends the following minor amendment to Policy 5:</p> <p>"By 13 March 2012, local authorities are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to consider activities associated with the development and operation of small and community-scale distributed renewable electricity generation."</p>
113	Nelson City Council	Yes	General comments	Not stated	<p>Submits that the proposed NPS does not, in its present form, provide the necessary policy direction as to the matter of national significance beyond that provided by s7 (j) of the Resource Management Act 1991 (the Act).</p> <p>Submits that the NPS needs a fundamental rethink and reworking if it is to assist in promoting the sustainable management of natural and physical resources. In its present form it is uncertain in its application, and will create significant additional work for Councils and affected parties that is not justified given the provisions of section 7 (j) of the Act.</p> <p>Considers it will fail to better provide for renewable electricity generation proposals and their benefits, and it will not provide an appropriate balance to the need to address adverse effects from such renewable electricity proposals.</p> <p>Submits that the effectiveness of the NPS is weakened because it embraces all scales of renewable electricity projects; it sweeps up all proposals from micro-scale single household projects to large scale projects. In this regard it is poorly targeted. The matter of national importance to be addressed by the NPS is inferred as significant projects that will make meaningful contributions towards the objectives and targets of the 'New Zealand Energy Strategy.'</p> <p>The Board of Inquiry could usefully consider whether the focus of the NPS could be improved by including a threshold of scale or significance that would warrant the interventions that are necessary in resource management plans to give effect to the NPS.</p>
			Policy 1	Not stated	<p>The Council considers it would be more efficient to include the matters (the benefits outlined in i. and ii. of this policy) in Part 2 of the Act rather than relying on a National Policy Statement.</p> <p>Refer to submission for reasons.</p>
			Policy 2	Support	<p>Accepts the aim of this Policy, which is to pave the way for renewable electricity generation to be established in a broader range of sites, while acknowledging the constraints on where these structures can occur in order to be effective and the subsequent issues that may arise from adverse effects. However, Council is unable to support this Policy as it creates significant ambiguity in relation to Part 2 considerations.</p> <p>Refer to submission for further information.</p>

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			Policy 3	Conditional support	<p>Policy 3: The Council supports this policy as it acknowledges that different technologies have a different nature and scale of effect to which consent authorities must have particular regard.</p> <p>However, although it may have been the intention to link this Policy back to section 6 matters, this is not articulated in the Policy. This is further complicated where district plans remain incomplete, with recognition of matters of national significance (section 6(b) in particular) not provided for as the identification process is yet to be advanced by councils.</p>
			Policies 4 and 5	Conditional support	<p>Policies 4 and 5: Supports the intent of the policies to introduce time bound performance in giving effect to the NPS.</p> <p>Considers it would be more efficient for the Government to specify the wording for these actual policies that each local authority must adopt (refer to submission for reasons).</p> <p>Considers another way to achieve some degree of centralised efficiency could be to provide 'acceptable wording' guidance alongside the NPS which Councils could choose whether or not to adopt.</p>
114	Taranaki Whanganui Conservation Board	Yes	General comments	Conditional support	<p>Considers that a NPS on Renewable Electricity Generation is urgently needed to provide leadership for communities, energy companies, regional and territorial authorities and other planning and decision-making bodies about the need for adequate recognition to the importance of other values in particular protection of valued landscapes and indigenous biodiversity.</p> <p>Considers that the proposed NPS must give more recognition to the economic and other benefits of preservation of undeveloped landscapes.</p> <p>National policy guidance is needed to provide greater certainty about what is appropriate development, in order to reduce some of the costs for individuals and groups in communities associated with participating in resource consent processes.</p>
			Objective 1	Conditional support	<p>The Conservation Board acknowledges that government policy goal of generating 90% of New Zealand's electricity from renewable sources by 2025 but considers that the wording of the objective needs to also recognise that this goal is achieved without further threats to New Zealand's indigenous biodiversity and nationally and regionally significant landscapes, and with adequate regard for the views of local communities.</p>
			Policy 1	Conditional support	<p>The Conservation Board recommends that Policy 1 be modified by adding the following:</p> <p>Maintaining or increasing electricity generation, and maintaining or increasing security of electricity supply must not result in further loss or degradation of habitat for indigenous flora and fauna, or regionally or nationally significant landscapes.</p>
			Policy 3	Support	<p>The Conservation Board supports Policy 3 requiring decision-makers to have particular regard to the relative reversibility of adverse effects associated with proposed generation technologies but emphasises the need for a comprehensive life cycle analysis thus ensuring a very broad understanding of adverse effects.</p>
			Policy 4	Conditional support	<p>Policy 4: The Conservation Board considers that local authorities should incorporate into policies and plans provisions for enabling appropriate renewable electricity generation, such provisions to be consistent with relevant Conservation Management Strategies and in particular their recognition of landscape and biodiversity values.</p>

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			Policy 5	Conditional support	Supports promotion of small and community-scale renewable electricity generation. The Conservation Board is aware that smaller scale development may not attract such strong community opposition as frequently occurs with larger scale developments. Also, there may be lesser impacts on the ecosystem and less intrusion into sensitive landscapes. It will be necessary to define the scale of the development (including - in the case of wind farm developments - the number and height of turbines, and area covered).
115	Auckland Regional Council	Yes	General comments	Conditional support	<p>ARC supports the provision of greater policy direction on renewable electricity generation. Generally supports the NPS, particularly as it attempts to provide a clear approach for planning authorities to respond to the 90% target.</p> <p>Preamble: ARC considers the preamble accurately describes the issues arising in respect of renewable electricity generation, in particular the balance to be achieved between increasing renewable electricity generation capacity while giving effect to sections 5, 6, 7 and 8 of the Act.</p> <p>Considers that the policies do not respect or deliver to the balancing exercise referred to in the Preamble and supported by the Objective.</p> <p>ARC considers that the NPS elevates renewable electricity generation activities to a status that undermines the broad sustainable management purpose of the RMA. In particular, it does not enable a balanced assessment of positive effects, adverse effects and relevant matters under Part 2. The NPS should identify matters that are relevant to achieving the purpose of the RMA, not exclude consideration of matters that are relevant to achieving the purpose of the RMA.</p> <p>In summary, ARC considers the key issues to be:</p> <ul style="list-style-type: none"> - achieving the purpose of the RMA and the weighing of environmental effects (see pages 3 - 4 of ARC's submission for details); - Ensuring the policies respect the Preamble and Objective (see pages 4 - 5 of ARC's submission for details); - Recognising small and community scale renewable electricity generation activities (see page 5 of ARC's submission for details); - Considering economic benefits where there are adverse environmental effects (see pages 5 - 6 of ARC's submission for details); - Implementing the NPS (see pages 6 - 7 of ARC's submission for details);
			Objective 1	Support	ARC supports objective and recommends it is retained in its entirety.
			Policy 1	Conditional support	<p>ARC submits that Policy One is retained subject to the following amendments.</p> <p>First sentence: "The economic and social benefits of renewable electricity generation..."</p> <p>"iii. integrating the renewable electricity generation activity with the transmission network and the establishment of peak load and/or back up generation while avoiding, remedying and mitigating the effects of these activities."</p>
			New Policy	Not applicable	ARC recommends adding 3 new policies on environmental effects. Refer to section 4.3 (page 8) of ARC's submission for details.
			Policy 2 - practical constraints	In Part	ARC recommends retaining Policy 2 subject to the following amendments:
			Policy 3	Conditional support	<p>ARC submits that if Policy 3 is to be retained the NPS should define the term 'reversibility' and the policy should be amended as follows:</p> <p>"When considering proposals to develop new renewable electricity generation activities, decision makers must 'consider' the relative degree 'and likelihood' of reversibility of the adverse environmental effects..."</p>
			Policy 4	Oppose	ARC submits that Policy 4 should be deleted and the intent placed in a NES to be notified by 13 March 2012.

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			Policy 5	Conditional support	ARC submits that Policy 5 be retained and a NES developed "to enable activities associated with the development and operation of small and community-scale distributed renewable electricity generation." The NES should be developed in such a way as to inform the plan change, proposed plan or variation required by Policy 5 to be notified by 13 March 2012.
116	Aotearoa Wave and Tidal Energy Association (AWATEA)	Yes	General comments	Support	<p>AWATEA welcomes and supports the general direction and terms of the draft NPS for Renewables. It believes that the NPS provides the appropriate guidance for the development of renewable electricity generation. As such it should provide support for other Government policies.</p> <p>Considers the implementation of a NPS for Renewables is well timed. Implementation of the NPS will provide regional councils and the Environment Court with guidance on the treatment of marine energy projects proposals. In large part the NPS for Renewables clearly supports and favours the development of marine energy in New Zealand.</p> <p>AWATEA has prepared a report "Environmental Impacts of Marine Energy Converters" which is attached as an Appendix to this submission.</p>
			Policy 3	Not stated	<p>In summary, almost all open-ocean wave and tidal current devices are unlikely to have significant post-operational environmental effects. Most devices, which are likely to be introduced in New Zealand, will cause no permanent and potentially little post-decommissioning effects. The high-energy environments in which the devices will be deployed may remove evidence of the former occupation by MECs relatively rapidly. Tidal barrages (or impoundments) may have the same effects as low-head hydro dams but AWATEA believes that these are unlikely to be built in New Zealand</p>
			Policy 4 - identification and research	Conditional support	<p>AWATEA takes comfort from the fact that Policy 4 requires local authorities to</p> <p>"...enable activities associated with:</p> <ol style="list-style-type: none"> 1. Identification and assessment by generators of potential sites and energy sources for renewable electricity generation 2. Research-scale investigation into emerging renewable electricity generation technologies and methods". <p>This policy therefore seems to allow for such streamlined consenting processes.</p> <p>Solutions sought: consider the benefits of a streamlined consenting process for prototype device deployments in association with the establishment of an open-ocean marine energy testing centre(s) or pilot zone(s) in New Zealand waters.</p>
			Policy 5	Conditional support	<p>AWATEA would like to see the exemption of marine projects from the <4 MW threshold removed from the NPS for Renewables so that marine energy projects can compete on a level playing field with other renewable energy project options in small and community-scale situations.</p> <p>AWATEA believes that the scale of effects of marine energy projects of <4 MW will be small, albeit not fully known at present.</p> <p>Using adaptive management processes, which current project applicants have proposed, the effects can be mitigated and the scale of these effects minimised.</p>

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117	Rushworth, Mark	No	General comments	Conditional support	<p>In principle supports the development of an NPS on renewable electricity generation. However, opposes certain aspects of the draft NPS.</p> <p>Comments on a number of issues: Scope of the types of renewable energy covered by the NPS; Hierarchy and sequential approach to site selection; Proximity principle; Deficiencies in the Section 32 evaluation; Commercial advantage; Weighting of renewable energy schemes; District Plan provisions. Refer to submission for detailed information on these matters.</p> <p>Requests that the NPS be amended to:</p> <ul style="list-style-type: none"> · Provide further detail in respect of the range of renewable energy generation covered by the NPS; · Include a hierarchy and sequential approach to site selection; · Include a proximity principle; · Ensure that environmental costs associated with renewable energy generation eg landscape, ecology and earth sciences, and social/cultural impacts on local communities are fully taken into account; · Promote the prudent use of energy and sustainable use of resources; · Ensure that the NPS does not distort commercial competition and promote unnecessary generation; · Provide measures to enable different types of renewable energy schemes to be weighted; · Not require all District Plan to include provisions for renewable energy exploration; · Make provision for a centralised (national) data base on renewable energy resources and technology.
118	Ohariu Preservation Society	Yes	General comments	Not stated	<p>Considers the NPS should include a connection between who will be paying for the proposed projects, the customer, identifying the class of customer, residential, commercial or industrial customer, the geographic location of the customers and the proposed project..... Connecting customer benefits with project development and operating costs will ensure NPS outcomes are identified and measured.</p> <p>OPS believes the NPS should take account of the health affects that new renewable electricity technology will have on people living in close proximity, for example within 3 kms of Wind Turbines.</p> <p>Directly linking project outcomes in the NPS to customer's benefits will help restore trust and confidence in the industry.</p> <p>OPS does not believe an NPS is required other than to provide certainty. In fact the NPS may muddy the waters developing uncertainties as adoption and consequently interpretation take time to evolve and mature. The NPS is useful where further transparency and disclosure occurs. Where it is not useful is where it plugs a Generators business case and RMA competency gaps.</p> <p>...An NPS will provide Generators not willing to do the necessary planning with an easy option; they will not have to lift their g</p> <p>There are two attachments to the submission: B Leyland : expert evidence to the Mill Creek Wind farm proposal hearings . Wind Turbine Syndrome : report by Dr Nina Pierpont.</p>

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			Policy 4	Not stated	<p>OPS believes local community consultation occurring earlier in the process will lead to better outcomes. Considers Generators are nervous and uncomfortable about how to consult and negotiate with local communities, mandating such change, particularly when they have poor or non-existent records of achievement will be a test.</p> <p>Considers NPS and the requirements placed on Local Councils to disclose information about sites and why those sites are ideal will benefit site selection by Generators... OPS believe quality information should be available with quality standards.</p> <p>Believes this NPS implies that if someone makes the political decision that a renewable energy project is 'essential' the effects on local communities can be virtually disregarded.</p> <p>Considers the NPS, as it is, places local communities at more risk to significant adverse effects, their lives and way of life disregarded due to politics.</p>
119	New Zealand Pork	No	General comments	Not stated	<p>Would welcome a more substantive NPS, pulling through some of the material from the S32, and more explicitly describing and weighting the competing values.</p> <p>Considers it would be appropriate if the reference to smaller-scale community schemes specifically included farm-scale renewable energy systems (eg, biogas).</p>
120	Centre for Resource Management Studies	Yes	General comments	Oppose	<p>Given the large number of internal conflicts, uncertain meanings, and unjustified assumptions, and given the large number of other policy documents guiding such decisions, wonders if such an NPS may create more problems than it solves.</p> <p>Questions whether there is a problem which needs to be addressed. The Reference Group report of May 2006 and the evaluation under Section 32 of the RMA did not identify any serious problem with current RMA practice, at least in relation to the specific issue of consenting of renewable energy generation plants.</p> <p>Preamble: includes the assumption that the first challenge facing New Zealand in this context is to respond to the risks of climate change by reducing greenhouse gas emissions caused by the production and use of energy. The Centre submits that the climate is always changing and there is always some risk associated with such changes. However, believes there is no evidence supporting the claim that greenhouse gas emissions caused by the production and use of energy are creating risks which could justify the costs liable to be associated with meeting the 90% target - See submission for detailed discussion.</p> <p>The Centre Seeks the Following Changes to the Proposal:</p> <ul style="list-style-type: none"> - Requests that the Board acknowledge that the Science relating to Anthropogenic Global Warming is NOT settled and that a new Policy Statement may be required and that in General the RMA needs to be amended to provide for a process which enables government to rapidly respond to changing knowledge and technology in ANY field relating to resource management. - Recommends that the use of targets (as in the Preamble and the Objective) should be abandoned and that cost-effective price signals should be used to encourage any changes in resource allocation deemed necessary by Government. <p>Seeks amendments to the interpretation section - refer to submission for details.</p> <p>The Centre has a serious, albeit generalised objection to the section 32 analysis - refer to submission for details.</p>

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			Policy 1	Not stated	<p>The first paragraph claims that: The benefits of renewable electricity generation activities, at any scale, are of national significance. The Centre asks “Why?”. Why is a solar panel driving an electric fence on the outer edge of my farmland of national significance? And why are the benefits of a tidal power scheme in the Kaipara Harbour of national significance if the benefits are far outweighed by the costs and adverse environmental effects?</p> <p>The policy then claims that the benefits of renewable energy may include: i. maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions. If this is such an important benefit surely this NPS (or some other statement) should consider the benefits of nuclear power in achieving this objective.</p> <p>The Centre seeks the following change to Policy 1 (Pt 2): (ii) maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation.</p> <p>The policy should be rewritten to recognize that renewable electricity generation that is dependent on an unreliable energy so</p> <p>The policy statement should also be rewritten to require plan writers and decision makers to have particular regard to the tota</p>
			Policy 2	Not stated	<p>The Centre wonders if any local authority has the information or skill base to carry out these analyses and further wonders how this NPS will assist them in doing so. For example, an analyst could look at a proposal and conclude:</p> <ul style="list-style-type: none"> · It’s too remote; too difficult; it’s the wrong kind, and it overloads existing infrastructure. <p>But another analyst could look at the same project and conclude:</p> <ul style="list-style-type: none"> · It is remote so it has fewer adverse effects on neighbours; it is difficult but “renewable generation” has so many benefits it should go ahead anyway; it may not be the best kind but it will supplement other generation so we should approve it anyway, and it will require new or upgraded roads but new roads are a benefit. <p>How would this NPS assist decision makers in deciding which positions are correct?</p> <p>The Centre submits that this policy points up a fundamental problem with the proposed NPS which may not be solvable by simply modifying the document.</p>
			Policy 3	Not stated	<p>The Centre wonders what this Policy actually means. They have asked several experts in the field and none have been able to determine what this means with any confidence, and consequently its meaning would probably be determined by a Court, and possibly deliver a surprise to everyone. (refer to submission for different interpretations).</p> <p>The Centre Seeks the Following Changes to the Proposal:</p> <p>Rewrite the policy to clarify the meaning, and in particular to make it clear there is no intended bias against hydro which after all is the most cost effective and reliable source of renewable electricity generation in most parts of New Zealand.</p> <p>The policy should also address the issue of weight so that decision makers know whether the government requires “reversibility” (whatever it means) to be given more or less consideration than say “security of supply”.</p> <p>And what about stability of supply? Does entropy count?</p>

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			Policy 4	Conditional support	<p>The Centre submits that this Policy places an onerous duty to impose on the territorial authorities of New Zealand, especially those local authorities in rural areas where populations are small and resources are scarce. If this is a requirement of a NPS then surely government should fund such research.</p> <p>The Centre Seeks the Following Changes to the Proposal: If Government wants Local Authorities to carry out this work in the National Interest then the NPS should acknowledge that Government is prepared to fund it.</p>
			Policy 5	Not stated	<p>The Centre wonders why a genuinely effects-based RMA plan would impede the introduction of small and community-scale distributed renewable electricity generation. The effects of such generators would be minor and should be able to be managed within any effects-based rural zone.</p> <p>Sadly, of course many District Plans and Regional Policy Statements are no longer effects- based but are based on lists of activities that are given specific classes of consent. If a proposed activity is not on the list it is “deemed to be non-complying.”</p> <p>This might be a useful opportunity to remind territorial authorities that if their plans do not enable the development of such small-scale generation (renewable or not) then it is probably not an RMA document but is still in the tradition of the Town and Country Planning Act.</p> <p>The Centre Seeks the Following Changes to the Proposal: This policy should point out that an effects-based RMA document should not create special impediments to proposals for community based small scale generation facilities, and that if the planning documents do impede such developments then this is likely to be symptomatic of a more general problem.</p>