SUBMISSION ON THE DRAFT NATIONAL PLANNING STANDARD

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For:

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Consenting Manager
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17th August 2018
Introduction

Contact Energy Limited (“Contact”) generates nearly a quarter of New Zealand’s electricity from eleven power stations, primarily consisting of renewable hydro on the Clutha River; geothermal power stations in the Waikato Region; and large gas turbine plant at Stratford in Taranaki. We also have assets at Te Rapa (Waikato) and Whirinaki (Hawkes Bay).

Until recently, Contact also owned the nationwide Rockgas LPG business, which has branches in most main centres of New Zealand; and we also supply natural gas to customers across the North Island. In all, Contact generates and supplies energy to over 560,000 businesses and homes across New Zealand, meaning we have a keen interest in New Zealand’s RMA planning guidance.

In recent years, Contact has transitioned itself towards increasing levels of renewable electricity generation, closed large baseload gas-fired power stations at Otahuhu and New Plymouth; and typically now generates around 85% of our electricity from renewable sources. The result is that our greenhouse gas emissions have fallen by over 50% since 2012. Our strategy is to continue to invest in new renewables and to help New Zealand decarbonise its electricity, industrial, and transport fuel sectors.

Contact’s activities and access to natural and physical resources like water, geothermal energy, wind sites and land, are enabled through resource consents and regional and district plans. As well as ensuring we act in a sustainable manner, the shape of New Zealand’s RMA planning regime is key to retaining our ability to meet new Zealand’s electricity demand by investing in renewable generation, and can assist (or constrain) central government’s desire to increase renewable energy production.

This submission will include particular reference to the importance of Integrated Management of Electricity Generation, and recommendations in relation to the definitions in the Draft NPS, particularly as they apply to Renewable Electricity Generation.

Integrated management of Electricity Generation

Planning documents in New Zealand are required to give effect to the 2011 National Policy Statement for Renewable Electricity Generation (NPS REG).

The NPS REG sets the strategic direction for New Zealand’s energy sector and recognises the role energy plays in the New Zealand economy.

The objective of the NZ Government is an efficient, renewable electricity system supporting New Zealand’s global competitiveness. To achieve this objective the Government has set a target that by 2035, 100% of electricity will be generated by renewable sources (such as geothermal, hydro and wind). This will require significant new investment by the electricity industry, and particular care by local authorities about the provisions they put in place to allow this to be achieved.

The NPS REG is intended to ensure that the national benefits of renewable electricity generation are appropriately recognised in consenting decisions and RMA plans. By giving this guidance, the NPS REG is intended to promote a more consistent approach to balancing the competing values associated with the development, maintenance and enhancement of New Zealand’s renewable energy resources. It also requires decision-makers to have particular regard to the locational requirements, the logistical or technical practicalities, and infrastructure requirements associated with developing, upgrading, operating or maintaining renewable electricity generation and gives greater certainty to applicants and the wider community.

Providing for integrated management of renewable electricity generation is key to enabling the aims of the NPS REG to be given effect to and in all relevant regional and district plans there should be clear linkages across the objective, policy and rule framework.

It is our experience that isolating individual activities into generic chapters tends to reduce the NPS REG’s ability to enable renewable energy development, or provide for recognition of specific benefits of particular infrastructure. Our submission is that the benefits of energy, particularly renewable energy, needs its own chapter within the proposed planning framework to ensure the objectives outlined in the NPS REG are given effect to, without being hindered, watered down or confused by more generic ‘infrastructure’ guidelines.
Specific submission to Draft National Planning Standards

Contact supports the desired outcome of the National Planning Standards to create a standardised guideline for planning documents in New Zealand. However, some sections would benefit from modifications to ensure appropriate planning outcomes can be achieved. In particular, the suggested changes are sought to ensure the integrated management of electricity generation.

In order to provide for the integrated management of renewable energy generation, Contact specifically recommends the following:

- Inclusion of an “Energy Generation” Chapter in planning documents
- Providing for more explicit connections and flexibility between chapters
- Inclusion of specific spatial tools for Energy generation activities

These considerations are outlined below:

Inclusion of separate energy chapter in planning documents

As outlined above, the NPS REG specifically recognises the benefits of renewable energy to New Zealand. Contact considers that a separate energy chapter within the proposed planning documents will enable better recognition of the national significance, benefits and RMA planning issues associated with renewable energy in comparison to other infrastructure.

Contact therefore proposes that the Structure Standards for the Regional Policy Statement (S-RPS), Regional Plan (S-RP), District Plan (S-DP), and Combined Plan (S-CP) be amended to include an energy chapter. In addition, it proposes that the District Wide Matters Standard (S-DWM) be amended to provide direction on the matters to be included in the new chapter.

Providing for explicit connections and flexibility between chapters

Various existing Regional policy Statements have Integrated Management as a significant matter addressed through prescribed objectives and policies. In the proposed standards, the compartmentalised theme chapters appear to be restrictive in how the standards, objectives and policies are drafted. This does not appear to provide for clear linkages between chapters which may influence each other. Under the proposed standards there is a concern that issues may be considered in isolation to each other, resulting in a fragmented framework of planning guidance.

This could have consequences where specific chapters that are included to enable sustainable development, such as infrastructure and energy, conflict with other chapters which are likely to prioritise protection of natural resources. The outcome of this may be that there is difficulty prioritising the specific chapters over and above another, and could make it difficult to implement the aims of higher order planning documents, such as the NPS for Renewable Electricity Generation.

Contact proposes that the specific wording in the draft standards be amended to allow some flexibility to provide for linkages between chapters.

Inclusion of specific spatial tools for Energy Generation

Contact considers that a specific zone should be provided for in the Area Specific Matters (S-ASM), District Plan (S-DP), and Mapping (F-2) standards to reference electricity generation. This would allow for spatial recognition of the vital activities associated with electricity generation specifically, rather than relying on a more generic provision under the proposed ‘special purpose zone’.

Contact believes that electricity generation has at least the equivalent significance of some of the other activities afforded a specific zone under the draft standards, such as ports or airports.

Enabling a specific zone for electricity generation activities would provide the ability to allow more enabling guidance within a specific defined area. Given the importance of renewable energy as recognised in the NPS REG this is considered to appropriate.
Contact therefore proposes that the Area Specific Matters (S-ASM), District Plan (S-DP) and mapping standards be amended to provide for an energy generation zone.

The specific proposed changes are outlined in the proposed amendments shown below.

**Proposed amendments to the Draft Standards**

**Regional Policy Statement Structure Standard (S-RPS)**
Amend Part 4 of Table 3 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 4 - THEMES</th>
<th>If integrated management matters are addressed in the regional policy statement they must be included in the Integrated management chapter.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integrated management</td>
<td></td>
</tr>
<tr>
<td>…</td>
<td></td>
</tr>
<tr>
<td>Infrastructure and energy</td>
<td>If infrastructure and energy matters are addressed in the regional policy statement they must be included in the Infrastructure and energy chapter.</td>
</tr>
<tr>
<td>Energy</td>
<td>If energy matters are addressed in the regional policy statement they must be included in the Energy chapter, acknowledging that matters related to the management of energy may also need to be addressed in other theme chapters.</td>
</tr>
<tr>
<td>Geothermal</td>
<td>If geothermal matters (including geothermal water, energy, features and vegetation) are addressed in the regional policy statement they must be included in the Geothermal chapter.</td>
</tr>
<tr>
<td>…</td>
<td></td>
</tr>
</tbody>
</table>

**Regional Plan Structure Standard (S-RP)**
Amend Part 4 of Table 4 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 4 - THEMES</th>
<th>If the local authority chooses to address matters on a theme basis, this part and any of its relevant accompanying chapters must be used.</th>
</tr>
</thead>
<tbody>
<tr>
<td>…</td>
<td></td>
</tr>
<tr>
<td>Infrastructure and energy</td>
<td>If the local authority chooses to address matters on a theme basis and infrastructure and energy matters are addressed in the regional plan they must be included in the Infrastructure and energy chapter.</td>
</tr>
<tr>
<td>Energy</td>
<td>If the local authority chooses to address matters on a theme basis and energy matters are addressed in the regional plan they must be included in the Energy chapter, acknowledging that matters related to the management of energy may also need to be addressed in other theme chapters.</td>
</tr>
<tr>
<td>Geothermal</td>
<td>If the local authority chooses to address matters on a theme basis and geothermal matters (including geothermal water, energy, features and vegetation) are addressed in the regional plan they must be included in the Geothermal chapter.</td>
</tr>
<tr>
<td>…</td>
<td></td>
</tr>
</tbody>
</table>
District Plan Structure Standard (S-DP)
Amend Part 4 of Table 5 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 4 – DISTRICT WIDE MATTERS</th>
<th>Local authorities must implement the District Wide Matters Standard (S-DWM)</th>
</tr>
</thead>
<tbody>
<tr>
<td>...</td>
<td>Local authorities must consider whether other sections should also be included in this chapter and include them if they are required.</td>
</tr>
<tr>
<td>Infrastructure and energy</td>
<td>... Energy matters may also be addressed via special purpose zones (e.g., electricity generation zone) or other provisions (spatial planning tools) that are applicable to the circumstances relating to specific energy matters.</td>
</tr>
<tr>
<td>Energy</td>
<td>...</td>
</tr>
<tr>
<td>...</td>
<td></td>
</tr>
</tbody>
</table>

Amend Part 5 of Table 5 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 5 – AREA SPECIFIC MATTERS</th>
<th>Local authorities must implement the Area Specific Matters Standard (S-ASM) as specified below.</th>
</tr>
</thead>
<tbody>
<tr>
<td>...</td>
<td>... Special purpose zones ... Electricity generation zone [Additional Special Purpose Zone] ...</td>
</tr>
</tbody>
</table>

Combined Plan Structure Standard (S-CP)
Amend Part 3 of Table 6 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 3 – REGIONAL POLICY STATEMENT</th>
<th>If a regional policy statement is part of the combined plan this part must be used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Significant resource management issues for the region</td>
<td>Significant resource management issues and discussion Local authorities must include sections where the matters raised are relevant as significant resource management issues for the region.</td>
</tr>
<tr>
<td>Themes</td>
<td>Integrated management If integrated management matters are addressed in the regional policy statement on a theme basis they must be included in the Integrated management section.</td>
</tr>
<tr>
<td>...</td>
<td>...</td>
</tr>
<tr>
<td>Infrastructure and energy</td>
<td>If infrastructure and energy matters are addressed in the regional policy statement on a theme basis they must be included in the Infrastructure and energy chapter.</td>
</tr>
<tr>
<td>Energy</td>
<td>If energy matters are addressed in the regional policy statement on a theme basis they must be included in the Energy chapter, acknowledging that matters related to the management of energy may also need to be addressed in other theme sections.</td>
</tr>
<tr>
<td>Geothermal</td>
<td>If geothermal matters (including geothermal water, energy, features and vegetation) are addressed in the regional policy statement on a</td>
</tr>
</tbody>
</table>
Amend Part 4 of Table 6 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 4 – REGION WIDE MATTERS</th>
<th>Local authorities must implement the District Wide Matters Standard (S-DWM) to the extent it is relevant</th>
</tr>
</thead>
<tbody>
<tr>
<td>...</td>
<td>...</td>
</tr>
<tr>
<td>Infrastructure and energy</td>
<td>If the combined plan does not include a district plan, and the local authority chooses to address infrastructure and energy matters on a theme basis this chapter must be used.</td>
</tr>
<tr>
<td>Energy</td>
<td>If the combined plan does not include a district plan, and the local authority chooses to address energy matters on a theme basis this chapter must be used, acknowledging that matters related to the management of energy may also need to be addressed in other theme chapters.</td>
</tr>
<tr>
<td>Geothermal</td>
<td>If the local authority chooses to address geothermal matters (including geothermal water, energy, features and vegetation) outside of the regional policy statement on a theme basis this chapter must be used.</td>
</tr>
<tr>
<td>...</td>
<td>...</td>
</tr>
<tr>
<td>Infrastructure and energy</td>
<td>If the combined plan includes a district plan then local authorities must implement the District Wide Matters Standard (S-DWM).</td>
</tr>
<tr>
<td>Energy</td>
<td>If the combined plan includes a district plan, energy matters may also be addressed via special purpose zones [e.g. electricity generation zone] or other provisions [spatial planning tools] that are applicable to the circumstances relating to specific energy matters.</td>
</tr>
<tr>
<td>...</td>
<td>If the combined plan includes a regional plan, regional plan provisions may be integrated with the implementation of the General District Wide Matters Standard (S-DWM).</td>
</tr>
<tr>
<td>...</td>
<td>The Noise and Vibration Metrics Standard (CM-2) must be implemented through the Noise and Light section.</td>
</tr>
</tbody>
</table>

Amend Part 6 of Table 6 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>PART 6 – AREA SPECIFIC MATTERS</th>
<th>If the combined plan includes a district plan, the local authority must comply with this part. Local authorities must implement the Area Specific Matters Standard (S-ASM).</th>
</tr>
</thead>
<tbody>
<tr>
<td>...</td>
<td>...</td>
</tr>
<tr>
<td>Special purpose zones</td>
<td>...</td>
</tr>
</tbody>
</table>
### District Wide Matters Standard (S-DWM)

Amend Directions 21 - 25 as follows (underline or strikethrough) or similar (e.g. separate district wide directions specific to an Energy chapter):

<table>
<thead>
<tr>
<th>Energy generation zone</th>
<th>[Additional Special Purpose] Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td>...</td>
<td>...</td>
</tr>
</tbody>
</table>

#### Infrastructure chapter and Energy chapter (S-IE)

21 The Infrastructure and energy chapter must, to the extent relevant contain provisions that give effect to:

- National Policy Statement for Renewable Electricity Generation 2011

21A The Energy chapter must, to the extent relevant include provisions that give effect to:

- National Policy Statement for Renewable Electricity Generation 2011

22 The Infrastructure and energy chapter must be consistent with the:

- Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009
- Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016
- National Policy Statement for Renewable Electricity Generation 2011

23 If relevant to a local authority, the following matters must be addressed in the Infrastructure and energy chapter unless provided in a special purpose zone, requirement or designation:

- objectives, policies and methods including rules if any, relating to the operation, maintenance, upgrading and development of infrastructure including where relevant:
  - state highways and local roads
  - railways
  - airports
  - ports
  - electricity generation, transmission and distribution
  - wastewater, stormwater and drinking water infrastructure
  - other network utilities not listed
  - bulk storage and transmission of fuel or energy
  - street furniture
  - any buffer corridor area provisions required for the national grid

  a. a statement about the zoning status of roads; eg, the adjoining zoning applies to the centre line of the road
  b. provisions to manage reverse sensitivity effects between infrastructure and other activities.

23A If relevant to a local authority, the following matters must be addressed in the Energy chapter unless provided in a special purpose [electricity generation] zone:
a. objectives, policies and methods including rules if any, relating to the development, operation, maintenance, and upgrading of electricity generation activities and structures.

b. provisions to manage reverse sensitivity effects between electricity generation activities and other activities.

24 Any noise related metrics must be consistent with the Noise and Vibration Metrics Standard (CM-2).

25 The Infrastructure and Energy chapter and the Energy chapter must refer to any relevant applied Special Purpose Zone (e.g., Airport zone, Port Zone, Hydro-electricity Generation Zone).

Area Specific Matters Standard (S-ASM)
Amend Direction 7 as follows (underline or strikethrough):

7 An additional special purpose zone must only be created when the proposed land use activities and anticipated development within the defined area:

a. are nationally significant or otherwise significant to the district or region; or

b. could not be enabled by any other zone; or

c. could not be enabled by the introduction of an overlay, precinct, designation, development area, or specific control; or

d. involves cross-boundary issues with another district or region.

Amend Direction 8 as follows (underline or strikethrough):

<table>
<thead>
<tr>
<th>Discretionary direction</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 The local authority must choose at least one of the following zones to use in their Plans. Each zone option contains a purpose statement which the zone provisions must fulfil.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Zone</th>
<th>Purpose Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>...</td>
<td>...</td>
</tr>
<tr>
<td>Electricity generation zone</td>
<td>The purpose of the Electricity generation zone is to:</td>
</tr>
<tr>
<td>...</td>
<td>• enable the development, ongoing operation, maintenance, and upgrading of electricity generation facilities and activities</td>
</tr>
<tr>
<td>...</td>
<td>• give effect to the National Policy Statement for Renewable Electricity Generation 2011, with respect to renewable electricity generation, including its national significance and benefits</td>
</tr>
<tr>
<td>...</td>
<td>• enable ancillary activities associated with electricity generation, including the system of electricity conveyance to the transmission or distribution network</td>
</tr>
<tr>
<td>...</td>
<td>• enable electricity storage technologies.</td>
</tr>
<tr>
<td>[Additional special purpose zone]</td>
<td>...</td>
</tr>
<tr>
<td>...</td>
<td>...</td>
</tr>
</tbody>
</table>
Contact supports the concept of standardising definitions across the various planning documents throughout the country. However, it is important that definitions accurately incorporate all the activities or concepts that are intended to be covered under the definition. By over-simplifying a definition, there is a risk that an activity or concept is restricted or not represented, and may cause issues in planning processes in the future.

In this regard, Contact recommends the following additions or modifications to the Draft set of definitions:

**Aquifer**

In a geothermal system, an aquifer also yields geothermal water (including steam) and energy and this should be captured by this definition.

Contact recommends amending the definition as follows:

> ‘means a permeable geological formation, group of formations, or part of a formation capable of receiving, storing, transmitting and yielding water and/or geothermal water and energy’

**Bore**

As noted above for the definition of ‘aquifer’, in the case of a geothermal system, a bore is also used to abstract or inject gas (steam) as well as liquid (water). This gas component should be added to the definition. In the alternative, this could refer to ‘geothermal water’ rather than gas as this is defined in the RMA as including steam.

For clarification purposes, the definition should also refer to a hole that is drilled or constructed.

Contact recommends amending the definition as follows:

> (a) means any hole drilled or constructed into the ground that is used to—
>  
> (i) investigate or monitor conditions below the ground surface; or
>  
> (ii) abstract liquid or gas substances from the ground; or
>  
> (iii) discharge liquid or gas substances into the ground; but
>  
> (b) it does not include test pits and soak holes’

**Geothermal Water**

In its current form, the term ‘geothermal water’ is not included in the draft definitions standard. Contact’s submission on the inclusion of ‘geothermal water’ in the ‘aquifer’ definition results in a requirement to define this in the standard.

It is recommended that the RMA definition of ‘geothermal water’ is adopted; i.e:

> “geothermal water means water heated within the earth by natural phenomena to a temperature of 30 degrees Celsius or more; and includes all steam, water, and water vapour, and every mixture of all or any of them that has been heated by natural phenomena”

Contact therefore recommends the definition be worded as:

> ‘has the same meaning as in section 2 of the RMA’

**Functional Need**

The definition in the Draft Standards does not suitably account for the operational needs of activities that may impact on where they can be located. Examples of technical, logistical or operational characteristics or constraints may include:

- The ability to transmit electricity from where it is generated to where it is used (i.e. proximity to suitable transmission or distribution infrastructure);
- A site having suitable transportation routes and access for construction, maintenance and upgrade projects to accommodate oversize or overweight loads, e.g. proximity to a suitable port for unloading equipment, strength of road bridges for heavy vehicles, and the tightness of road curves (e.g. for transporting wind turbine blades);
- The design and placement of wind turbines within a windfarm to minimise turbulence effects; and
- The management of the flows and levels of lakes and rivers associated with hydro-electricity reservoirs to meet operational design and electricity market conditions;

In this regard, the definition of ‘functional need’ is considered to unnecessarily focus on locational factors related to the siting of an activity and does not appropriately consider the operational needs of activities. That is, ‘functional need’ is specific to the location of the activity, whereas an operational need is specific to the characteristics and constraints of the activity. In some cases, an activity has both a ‘functional need’ and ‘operational need’, in other cases, it may be one or the other.

The Ministry for the Environment Evaluation Report (Part 2C – Definitions, page 93) notes that the concept in ‘functional need’ is recognised in Policy C of the NPS-REG, but it does not acknowledge that logistical or technical practicalities and constraints (being the concepts in ‘operational need’) are also recognised by Policy C of the NPS-REG. Logistical or technical factors are those that would make it very difficult to construct a structure or carry out an activity in any other way.

Contact also notes that more recent statutory planning documents include policies that refer to ‘functional needs’ and ‘operational needs’. This includes the Auckland Unitary Plan, which considers whether the infrastructure has a functional or operational need to be located in, or, traverse a proposed location. Both functional need and operational need are defined in the plan.

Contact recommends providing a new definition for ‘operational need’ as follows:

‘operational need – means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.’

Reverse sensitivity

The proposed definition of ‘reverse sensitivity’ does not adequately provide for activities that are consented but not currently implemented. Prospective renewable energy developments are significant investments, require long term project planning and take a significant amount of time to bring online. Protecting resource management decisions and the investment already made from reverse sensitivity concerns are of particular importance to Contact.

The definition proposed should cover both existing and consented developments. Contact therefore recommends amending the definition as follows:

means the potential for the operation of an consented or existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an consented or existing activity.

Small Scale Renewable Electricity Generation

Contact generally supports the definition of Small Scale Renewable Electricity Generation, however we consider that the 20kW limit may be overly restrictive in the face of new, emerging and improved technologies.

Regardless of the kW limit, any new small scale generation would need to comply with all relative guidance of planning documents. On this basis, Contact proposes an increased kW limit would still provide for small scale generation but ensure that reasonably sized small scale generation would not be categorised as large scale and hence be overly restricted in their development. Contact proposes that a 500kW limit could still be considered as ‘small scale’.
Contact recommends the definition be amended to:

\[\text{means renewable electricity generation which does not exceed a power rating of } \leq 500 \text{ kW}.\]

**Special audible Characteristics**

The proposed definition does not currently provide sufficient clarity, such as the location where its “subjective acceptability” is applied or how it is assessed. Any ‘special audible characteristics’ should only be applied at a ‘notional boundary’ (as defined by the draft Standard) and its assessment should be in accordance with a relevant Acoustic New Zealand Standard.

Contact recommends amending the definition as follows:

\[\text{‘means sound that has a distinctive characteristic such as tonality or impulsiveness which affects its subjective acceptability assessed (unless otherwise stated in a rule) at the notional boundary in accordance with the applicable New Zealand Acoustical Standard.’}\]

**Noise and Vibration Metric Standard (CM-2)**

The Noise and Vibration Metrics Standard (CM-2) requires rules in planning documents which manage emission of noise to be consistent with the acoustic New Zealand Standards. Contact is supportive of this requirement.

We note however that the specific wording of the standard under clause 3, only requires that any plan rule to manage an emission of noise must be consistent with the noise measurement methods of the New Zealand Standards. There is no requirement in the standard for plan rules to adopt the corresponding noise metrics contained in the New Zealand Standards. Furthermore, while clauses 24 and 32 of the District Wide Matters Standard (S-DSM) do require any noise related metrics must be consistent with the Noise and Vibration Metrics (CM-2) standard, those clauses do not require the measurement methods to be consistent with the standard.

There is also a conflict within CM-2, table 30, where the standard references the various acoustic standards. However, direction 4 goes on to state that all plan noise rules must be consistent with NZS 6802:2008 Acoustics- Environmental Noise. The referenced acoustic standards were developed specifically to address the fact that they cannot fit within the Environmental Standard, and as such they need to be adequately catered for.

In light of the above, Contact recommends the following changes:

Amend Directions 3 and 4 as follows:

3. Any plan rule to manage an emission of noise must be consistent with the noise related metrics and noise measurement methods in the New Zealand Standards listed in table 30: Acoustic New Zealand Standards below.

**Table 30: Acoustic New Zealand Standards referenced**

<table>
<thead>
<tr>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>NZS 6802:2008 Environmental Noise</td>
</tr>
<tr>
<td>NZS 6052:2008 Mechanical Noise</td>
</tr>
<tr>
<td>NZS 6053:2008 Electrical Noise</td>
</tr>
</tbody>
</table>

.............
4. Any plan rule to manage an emission of noise must be consistent with the assessment methods in section 6 Rating Level and section 7 LMAX in New Zealand Standard 6802:2008 Acoustics—Environment Noise.

District Wide Matters Standard (S-DSM)

Amend Direction 24 (for Infrastructure and Energy) and Direction 32 (for General District-Wide Matters chapter) as follows:

Any noise related metrics and measurement methods must be consistent with the Noise and Vibration Metrics Standard (CM-2).

Future Planning Standards

One of the key questions presented in the Ministry for the Environment Consultation document was ‘what topics or matters should be investigated for future planning standards’.

New Zealand challenged with the need to transition towards a low carbon economy. The government’s target of having a 100% renewable electricity generation by 2035 is one of the key challenges to be addressed in New Zealand, and the RMA is instrumental in enabling or constraining that aim. Contact is positioning itself to accelerate the decarbonisation of industry and transport fuels in New Zealand, and a well-established and well aligned RMA planning system will be a key component to enable this.

Future planning standards will need to provide for and align with the governments push for renewable energy and to achieve this, it is highly likely that future planning standards will need to expressly recognise the importance of this.