

RE - Renewable Energy

| Section / Sub-section / Provision | Submitter Name | Submission number / Point Number | Position | Summary of Submission | Relief Summary | Link to Submission (click to open) |
|---|----------------|----------------------------------|----------|---|---|------------------------------------|
| RE - Renewable energy /Policies | Sera Chambers | 150.106 | Amend | Considers that the wording should be amended to allow adjoining landowners to be notified and be able to have their say to allow their enjoyment of property rights as a guiding principle and the option to have the impact mitigated by the entity impacting the enjoyment. | seeks for a fifth item to be added to list of things that need to be protected as below: <u>e. adjoining landowners should be notified and be able to have their say on this, to allow their enjoyment of property rights as a guiding principle and the option to have the impact mitigated by the entity impacting the enjoyment.</u> | Open Submission |
| RE - Renewable energy /Issues /RE-I2: Management of adverse effects of renewable energy activities. | James Witham | 165.12 | Amend | Considers some forms of renewable energy generation can conflict with the effective productive capacity of versatile and highly productive land. Notes that the National Policy Statement for Highly Productive Land does not provide for new specified infrastructure, including renewable generation, on Highly Productive Land. In addition, the Hawkes Bay Regional Council has identified other pieces of land which are also highly productive and should be included and considers this should be recognised in the issue statement. | Amend RE-I2: Management of adverse effects of renewable energy activities as follows or alternative and any consequential relief required to address the matters raised in the submission: Amend RE-I2: Management of adverse effects of renewable energy activities Potential adverse effects can include visual amenity and landscape and character impacts, particularly where sited in residential zones or areas with identified significance values <u>including Highly Productive Land and Versatile Land</u> . Some forms of renewable energy generation may also generate nuisance such as noise, vibration, lighting and traffic effects. Sometimes these adverse effects have to be balances alongside recognition any special technical requirements of constraints that may limit where a network utility can be sited. | Open Submission |
| RE - Renewable energy /Policies /RE-P2: Providing for renewable electricity generation activities. Relates to RE-O1 | James Witham | 165.13 | Amend | Considers the policy should recognise that some forms of renewable energy generation can conflict with the effective productive capacity of versatile and highly productive land. Also that The National Policy Statement for Highly Productive Land does not provide for new specified infrastructure, including renewable generation, on Highly Productive Land. | Amend RE-P2 Providing for renewable electricity generation as as follows or alternative and any consequential relief required to address the matters raised in the submission: RE-P2 Providing for renewable electricity generation Provide for the identification, investigation, establishment, development, upgrading, operation and maintenance of new and existing renewable electricity generation activities in a manner that supports the protection of: a. Significant natural areas identified in the Plan; b. Outstanding natural features and significant landscape features identified in the plan; c. Sites of significance to Māori identified in the Plan; and d. Historic heritage area, heritage items, and notable trees identified in the Plan; <u>and</u> e. <u>The productive capacity of Highly Productive Land and Versatile Land</u> | Open Submission |
| RE - Renewable energy /RE - Renewable Energy - Rules Table /RE-R4: Construction and commissioning of new renewable electricity generation activities in all zones and precincts | James Witham | 165.14 | Amend | Considers that some forms of renewable energy generation can conflict with the effective productive capacity of versatile and highly productive land. Considers the National Policy Statement for Highly Productive Land does not provide for new specified infrastructure, including renewable generation, on Highly Productive Land and that this land should be protected as required. | Amend RE-R4 Construction and commissioning of new renewable electricity generation activities in all zones and precincts as follows or alternative and any consequential relief required to address the matters raised in the submission: RE-R4 Construction and commissioning of new renewable electricity generation activities in all zones and precincts RE-R4A Activity Status: Discretionary Where: 1. New renewable electricity generation activities must not be located within a significant natural area, outstanding natural feature, significant landscape features, sites of significance to Māori, and/or historic heritage areas, heritage items and notable trees identified on the Planning Maps and in appendices and schedules; <u>and, Highly Productive Land or Versatile Land</u> RE-R4B Activity Status where activity condition 1 is not met: Non-complying | Open Submission |

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| RE - Renewable energy /Assessment criteria - Discretionary Activities | James Witham | 165.15 | Amend | Considers that some forms of renewable energy generation can conflict with the effective productive capacity of versatile and highly productive land. Considers that the National Policy Statement for Highly Productive Land does not provide for new specified infrastructure, including renewable generation, on Highly Productive Land and this land should be protected as required. Considers that the matters are appropriate for new or expanded renewable energy generation activities, but need not apply to new activities where the relief sought by the submitter regarding non-complying activities is granted. | Amend the Assessment Criteria – Discretionary Activities by Inserting the following criteria as follows or alternative and any consequential relief required to address the matters raised in the submission: <u>...x. the extent to which the proposal avoids Highly Productive Land and Versatile Land;</u> <u>xx. the extent to which the proposal maintains, the life supporting and productive capacity of Highly Productive Land and Versatile Land.</u> | Open Submission |
| RE - Renewable energy /General /General | Ellen Robotham | 198.43 | Support | Generally supportive of the RE – Renewable Energy Chapter. The 2040 Master Plan identified the potential for future development on the western side of the runway, including the possibility of a solar farm as a joint venture, and in consultation with Mana Ahuriri Trust. Many airports around the world are investing in solar installations as an opportunity to reduce the carbon footprint of the airport and to assist airlines with the pending transition to lower emission aircraft (be it through Sustainable Aviation Fuel, hydrogen or electrification). Support the inclusion of the Renewable Energy chapter in the Proposed Plan and provisions which support the development of renewable energy infrastructure in the District. Enabling the development of renewable electricity generation activities in accordance with the National Policy Statement for Renewable Electricity Generation 2011 is an essential component of achieving New Zealand’s renewable energy goals. The Government has also signalled that further changes will be made to this policy statement to further accelerate the development of such activities. It provides a clear pathway for the establishment of renewable electricity generation activities across all zones in the District. However, opportunities for greater alignment with the directives of National Policy Statement for Electricity Generation (and any subsequent amendments to those directives) should be considered and included in the proposed RE – Renewable Energy chapter. | Retain as notified. | Open Submission |
| RE - Renewable energy /Issues /RE-I2: Management of adverse effects of renewable energy activities. | Trevor Ellis | 253.39 | Amend | Renewable energy activities can create and impose adverse effects on indigenous biodiversity, alongside visual amenity and landscape character. Considers that the issue statement should be updated to reflect the potential for adverse effects on indigenous biodiversity. | seeks to amend RE-I1 to acknowledge the potential adverse effects on indigenous biodiversity from some renewable energy activities | Open Submission |
| RE - Renewable energy /Objectives /RE-O1: Sustainable use and development of renewable energy resources. | Trevor Ellis | 253.40 | Support | RE-O1 recognises the novelty of renewable energy projects and that adverse effects should be avoided, minimised, and remedied. | Retain as notified. | Open Submission |
| RE - Renewable energy /Policies /RE-P2: Providing for renewable electricity generation activities. | Trevor Ellis | 253.41 | Amend | Considers that RE-P2 recognises that specific areas of the District are vulnerable to adverse effects that may be caused by renewable energy and should be protected. However, it should still include areas of natural character and indigenous biodiversity as areas that are vulnerable. Natural character cannot be easily recreated / restored along with habitats for indigenous biodiversity. | Seeks to amend as follows:RE-P2: Providing for renewable electricity generation activities Provide for the identification, investigation, establishment, development, upgrading, operation, and maintenance of new and existing renewable electricity generation activities in a manner that supports the protection of: a. significant natural areas identified in the Plan; b. outstanding natural features and significant landscape features identified in the Plan; c. sites of significance to Māori identified in the Plan, and; d. historic heritage areas, heritage items, and notable trees identified in the Plan; <u>e. indigenous biodiversity;</u> <u>f. natural character.</u> | Open Submission |
| RE - Renewable energy /Policies /RE-P4: Providing for small-scale renewable electricity generation activities. | Trevor Ellis | 253.42 | Amend | Considers that RE-P4 recognises that specific values in the District are vulnerable to adverse effects that may be caused by renewable energy and should be protected. Considers that the list of values should be expanded to include indigenous biodiversity. | Seeks to amend to add reference to indigenous biodiversity effects enabling them to be assessed where relevant for small scale REG activities. | Open Submission |

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| RE - Renewable energy /RE - Renewable Energy - Rules Table /RE-R4: Construction and commissioning of new renewable electricity generation activities in all zones and precincts | Trevor Ellis | 253.43 | Amend | Considers that Rule RE-R4 recognises the novelty of renewable energy projects, and that each application should be considered on its own merits. However, the discretion should be updated to reflect the vulnerable nature of the coastal environment. | Seeks to amend as follows: RE-R4A Activity Status: Discretionary Where: 1. New renewable electricity generation activities must not be located within a significant natural area, outstanding natural feature, outstanding natural character, significant landscape features, <u>an area with significant indigenous biodiversity</u> , sites of significance to Māori, and/or historic heritage areas, heritage items, and notable trees identified on the Planning Maps and in appendices and schedules. | Open Submission |
| RE - Renewable energy /Objectives /RE-O1: Sustainable use and development of renewable energy resources. Relates to RE-I1 and RE-I2. | Nichola Nicholson | 264.14 | Amend | Generally supports the renewable energy provisions however would like to see strengthened direction regarding the resilience of the energy supply and efficient use of energy (inclusive of transport energy) i.e. through appropriately located development and well-designed urban environments and buildings. | Generally supports the renewable energy provisions however would like to see strengthened direction regarding the resilience of the energy supply and efficient use of energy (inclusive of transport energy) i.e. through appropriately located development and well-designed urban environments and buildings. | Open Submission |
| RE - Renewable energy /Policies /RE-P2: Providing for renewable electricity generation activities. Relates to RE-O1 | Heritage New Zealand Pouhere Taonga - Dean Raymond | 273.24 | Support | Supports RE - Renewable energy Policy RE-P2: Providing for renewable electricity generation activities as NZPT supports the protection of historic heritage and cultural values in this policy. | Retain RE - Renewable energy Policy RE-P2: Providing for renewable electricity generation activities in its entirety. | Open Submission |
| RE - Renewable energy /RE - Renewable Energy - Rules Table /RE-R3: Wind monitoring masts in all zones and precincts. | Heritage New Zealand Pouhere Taonga - Dean Raymond | 273.25 | Amend | Considers that RE - Renewable Energy - Rules Table RE-R3: Wind monitoring masts in all zones and precincts should be amended in Clause 3 to more accurately reference the historic heritage places included in the Plan Schedules. | Amend RE - Renewable Energy - Rules Table RE-R3: Wind monitoring masts in all zones and precincts as follows: 3. Wind monitoring masts must not be located within a significant natural area, outstanding natural feature, significant landscape features, sites of significance to Māori, and/or historic heritage areas , sites containing heritage items, historic heritage precincts or overlays, and notable trees identified on the Planning Maps and in Schedule 1 - Notable Trees, Schedule 2 - Natural Features and Landscapes, Schedule 3 – Historic Heritage items, and Schedule 4 – Historic Heritage Overlay and Precinct, and ... | Open Submission |
| RE - Renewable energy /RE - Renewable Energy - Rules Table /RE-R4: Construction and commissioning of new renewable electricity generation activities in all zones and precincts | Heritage New Zealand Pouhere Taonga - Dean Raymond | 273.26 | Amend | Considers that RE - Renewable energy Rule RE-R4: Construction and commissioning of new renewable electricity generation activities in all zones and precincts should be amended to be consistent with the PDP provisions. | Amend RE - Renewable energy Rule RE-R4: Construction and commissioning of new renewable electricity generation activities in all zones and precincts as follows: 1. New renewable electricity generation activities must not be located within ... historic heritage areas <u>overlays and precincts</u> ... | Open Submission |
| RE - Renewable energy /RE - Renewable Energy /General | Dr. Chantal Pagel Natasha Sitarz | 289.33 | Amend | Considers the overlap between these chapters makes it very confusing to understand which infrastructure activities are addressed and in which chapter(s) they are addressed. The overlap between provisions in these chapters also makes it unclear how effects are managed and to understand implications for how the ECO provisions may or may not apply to these activities. | Seeks clarification of what activities are addressed in which chapters. Include provisions for infrastructure that is not a “network utility”, “renewable energy generation”, “Stormwater” or “transport”. Rename the section heading or change section names to Energy, Infrastructure and Transport. | Open Submission |
| RE - Renewable energy /Introduction. | Dr. Chantal Pagel Natasha Sitarz | 289.46 | Amend | Considers it is not clear how this chapter “interrelates” with the Network utility chapter. For example, is this only to the extent that or in circumstances where RE activities may affect network utilities? | Seeks clarification of how and the extent to which the chapter “interrelates” with the NU chapter or amend so that the NU chapter does not apply to RE activities. | Open Submission |
| RE - Renewable energy /Objectives /RE-O1: Sustainable use and development of renewable energy resources. | Dr. Chantal Pagel Natasha Sitarz | 289.47 | Amend | Considers that the direction on managing adverse effects is inconsistent with s5 and the NPSREG as it fails to include “remedying” adverse effects. Setting direction on how effects are to be managed should sit within policy and provide for specific direction on effects management to come from other chapters including the CE, NFL, ECO and NH chapters. | Amend as follows: Sustainable use and development of renewable energy resources are encouraged by enabling for <u>renewable electricity generation activities throughout the city, while avoiding, mitigating, or offsetting adverse effects that are more than minor</u> . | Open Submission |

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| RE - Renewable energy /Policies /RE-P1: Provision for use and development of renewable energy resources. | Dr. Chantal Pagel Natasha Sitarz | 289.48 | Amend | Generally supportive of the contribution renewable electricity generation can make towards addressing effects of climate change. However, it is not clear whether renewable generation activities will need to demonstrate that contribution. Nor is the policy direction clear in term of ensuring that the recognition of benefits for addressing climate change considers impacts of the activity on natural values which may also be addressing effects of climate change. Is concerned that as proposed the consideration of benefits of the renewable electricity generation activity would override or is considered in absences of any consideration of loss of ecosystem function or indigenous biodiversity that may also be of benefit in terms of reducing the impacts of climate change. | Seeks to add policy direction to ensure that the effects of renewable energy generation on natural values that reduce the impacts of climate change are considered when considering the benefits of the activity. | Open Submission |
| RE - Renewable energy /Policies /RE-P2: Providing for renewable electricity generation activities. Relates to RE-O1 | Dr. Chantal Pagel Natasha Sitarz | 289.49 | Oppose | Considers that the policy is inconsistent with the NZCPS. SNAs are not yet identified in the plan, and not all areas meeting the criteria for significance will necessarily be mapped due to factors such as natural changes and access to private property. Given the loss of, and low level of indigenous vegetation in Napier, even low value indigenous vegetation or areas of exotic vegetation could provide important connectivity and habitat. The plan should include policy direction for protection of all significant indigenous biodiversity whether specifically "identified" in the plan or not. The Ahuriri Estuary Te Whanganui-a-Orotū is an outstanding water body in terms of the NPSFM. The policy is not clear in terms of managing adverse effects of renewable electricity generation activities, nor do other policies capture this. | Amend as follows: Provide for the identification, investigation, establishment, development, upgrading, operation, and maintenance of new and existing renewable electricity generation activities in a manner that: 1. supports the protection of: a. significant natural areas identified in the Plan; b. outstanding natural features and significant landscape features identified in the Plan; c. sites of significance to Māori identified in the Plan, and d. historic heritage areas, heritage items, and notable trees identified in the Plan.; <u>and</u> 2. <u>avoids, remedies or mitigates adverse effects on the environment.</u> | Open Submission |
| RE - Renewable energy /Policies /RE-P4: Providing for small-scale renewable electricity generation activities. Relates to RE-O1 | Dr. Chantal Pagel Natasha Sitarz | 289.50 | Oppose | Considers that the policy fails to include adequate provision to avoid, remedy or mitigate adverse effects on the environment. | Amend as follows: Provide for small-scale renewable electricity generation activities <u>and manage their where adverse effects on the environment are so as to avoided, remedied or mitigated adverse effects on the character and amenity of the zone in which they are located.</u> | Open Submission |
| RE - Renewable energy /General /General | Dr. Chantal Pagel Natasha Sitarz | 289.51 | Oppose | Opposes the whole chapter, including Introduction, Objectives, Policies and Rules. Arising from late notification of ECO-chapter. | Seeks to add: <u>"The Ecosystems and Indigenous Biodiversity chapter includes provisions which relate to renewable energy. Where there is a conflict between the Renewable Energy chapter and the Ecosystems and Indigenous Biodiversity chapter, the provisions that place greater or additional restrictions on activities with adverse effects on the natural environment will apply".</u> | Open Submission |
| RE - Renewable energy /RE - Renewable Energy - Rules Table /General | Dr. Chantal Pagel Natasha Sitarz | 289.52 | Oppose | Considers that the rules do not ensure adverse effects within the coastal environment are in accordance with the requirements of the NZCPS. In particular the rules do not give effect to Policies 11, 13 and 15 of the NZCPS. The rules potentially conflict with the ECO chapter provisions. | Seeks to add a condition/standard to all rules that the activity is not within the coastal environment, any outstanding waterbody, outstanding NFL or significant natural area. Where this is not complied with the activity must comply with rules in the ECO chapter or is a non-complying activity. | Open Submission |