

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
s8.7	Dhivian Govender	REG General	Support	Support for partnerships with organisations to develop solar electricity generation, especially along the west coast where such work has already started.	Sustainable energy creates a safe and happy place and provides long-term benefits to the community. Kaipara District Council should embrace sustainable energy alternatives.	Reject	Section 3.2.1 Topic 1: General submissions on REG Chapter
117.5	Greg Moore	REG General	Oppose	AMEND the Renewable electricity generation chapter to add standards for renewable electricity generation in Kaipara. Refer to the submission for examples of vibration and glare standards linked and attached.	The submitter considers that there needs to be more thought and structure put into the way we move forward with renewable energy and the Kaipara District. They refer to exporting renewables to Auckland, infrastructure location restrictions, skyline pollution, vibration, glare and end of life considerations for panels and turbines.	Reject	Section 3.2.4 Topic 1: General submissions on REG Chapter
136.36	Federated Farmers of New Zealand (Inc) - Northland Province	REG General	Support	RETAIN the provisions of the Renewable electricity generation chapter as notified. OR With wording that achieves a similar intent and/or effect. AND Any consequential amendments.	The submitter supports the provisions for Renewable electricity generation. The provisions provide for the operation, maintenance and upgrading of renewable energy facilities without any unnecessary barriers.	Accept	Section 3.2.1 Topic 1: General submissions on REG Chapter
172.7	A Preston	REG General	Amend	No specific decision sought; however, the submission supports any activities which enable the development of the capability to generate renewable electricity.	The submitter considers we have a responsibility to reduce emissions.	Accept in part	Section 3.2.1 Topic 1: General submissions on REG Chapter
212.10	BA & JK Paton Ltd	REG General	Support	RETAIN the whole Renewable Electricity Generation chapter.	The submitter has sought this relief without limiting the scope of the submission on the details in other	Accept in part	Section 3.2.1 Topic 1: General

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				AND Any other relief that is consistent with and/or consequential to the submission.	Proposed District Plan chapters or maps.		submissions on REG Chapter
217.35	Cato Bolam Consultants Limited	REG General	Support	RETAIN the Renewable electricity generation chapter. AND Any other relief that is consistent with and/or consequential to the submission.	The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.	Accept	Topic 1: General submissions on REG Chapter
283.57	Northpower Limited and Northpower Fibre Limited	REG General	Support	RETAIN the notes in the Renewable Electricity Generation chapter as notified.	The submitter supports this note.	Accept	Section 3.2.1 Topic 2: REG Chapter Overview, notes and definitions
292.25	Transpower New Zealand Limited	REG General	Support	RETAIN the Renewable Electricity Generation chapter. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.	This chapter is of relevance as renewable electricity generation will play a critical role in New Zealand’s carbon zero commitment and mitigating the effects of climate change. Transpower is generally supportive of the policy approach to recognise and provide for renewable electricity generation activities.	Accept	Section 3.2.1 Topic 1: General submissions on REG Chapter
309.3	Clarus	REG General	Support	No specific decision requested but submitter supports the Renewable electricity generation chapter overall, subject to some specific requests sought in its submission. AND	Background to the specific relief sought in Section 2 of the submission.	Accept in part	Section 3.2.2 Topic 1: General submissions on REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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				AMEND the Renewable electricity generation chapter to cover other forms of renewable energy generation, consistent with the Northland Regional Policy Statement.			
309.23	Clarus	REG General	Amend	<p>AMEND the title of the Renewable electricity generation chapter to "<u>Renewable Energy Sources and Electricity Generation</u>".</p> <p>AND</p> <p>AMEND the existing objectives, policies, and rules including their names as requested in other submission points.</p> <p>OR</p> <p>ADD additional objectives, policies, and rules that specifically address the generation of non-electrical renewable energy.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	The intent of the chapter is supported but we do not consider that it should be limited to renewable electricity. While this is the subject of the National Policy Statement for Renewable electricity generation there are other forms of renewable and low- carbon energy that should be equally supported. These may arise from (e.g.) landfill gas capture, biowaste digestion, wastewater treatment plant capture or importation. These are supported by Northland Regional Policy Statement, Policy 5.4.1.	Reject	Section 3.2.3 Topic 1: General submissions on REG Chapter
FS41.51	Channel Terminal Services Ltd	REG General	Support	Accept the relief sought by the submitter.	Supports amending the title of the REG Chapter to reflect the broader range of existing and future renewable energy activities.	Reject	Section 3.2.3 Topic 1: General submissions on REG Chapter
332.59	Northland Regional Council	REG General	Amend	RETAIN the objectives and policies in the Renewable electricity generation chapter other than those sought to be amended in other submission points	They are consistent with the Regional Policy Statement Objective 3.9 and Policies 5.4.1 to 5.4.3.	Accept in part	Section 3.2.1 Topic 1: General submissions on REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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149.14	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG Overview	Amend	<p>AMEND the Overview to the Renewable electricity generation chapter to include "<u>maintenance, operations and upgrading of renewable electricity generation</u>" in the section describing where potential adverse effects on the environment may arise.</p> <p>AND</p> <p>RETAIN the explanation of other Part 2 provisions applying in the Overview to the Renewable electricity generation chapter.</p> <p>AND</p> <p>ADD more detailed cross-referencing to other Part 2 chapters in the Note.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>The submitter requests that 'maintenance, operations and upgrading' are added to the Overview as these activities can result in adverse effects on the environment and, as such, should be included.</p> <p>Detailed cross-referencing is requested in order to ensure the Proposed District Plan is clear and effective.</p>	Reject	Section 4.2.1 Topic 2: REG Chapter Overview, notes and definitions
304.39	Director General of Conservation	REG Overview	Amend	<p>AMEND the Overview in the Renewable electricity generation chapter as follows: The provisions in this chapter apply to all types of renewable electricity generation activities, from small-scale solar generation to large-scale wind farms, and apply across the Kaipara District. <u>While</u> the zone rules in Part 3 – Area-specific matters do not apply to renewable electricity generation activities but there may be other provisions in Part 2 – District wide matters that do apply to renewable electricity generation activities.</p> <p>AND</p> <p>Any alternative or consequential relief.</p>	Opposes the Overview in part because, as drafted, it is ambiguous regarding whether Part 2 - District Wide Matters provisions apply to renewable electricity activities.	Accept in part	Section 4.2.1 Topic 2: REG Chapter Overview, notes and definitions

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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FS93.149	Royal Forest and Bird Protection Society of NZ	REG Overview	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 4.2.1 Topic 2: REG Chapter Overview, notes and definitions
309.24	Clarus	REG-O1	Amend	AMEND REG-O1 as follows: The benefits of increasing renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the objective name of REG-O1 accordingly. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	Objective as proposed does not include other renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.52	Channel Terminal Services Ltd	REG-O1	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG objectives where the amendment improves consistency, clarity and functionality of provisions. The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.	Reject	Section 5.2.2 Topic 3: REG Objectives
283.43	Northpower Limited and Northpower Fibre Limited	REG-O1	Amend	AMEND REG-O1 as follows: “REG-O1: Benefits of renewable electricity generation <u>activities</u> ” The benefits of increasing renewable electricity generation activities at all scales	The submitter supports this objective, and objective title with the amended changes sought to be in alignment with Policy 5.4.1 of the Northland Regional Policy Statement.	Accept	Section 5.2.2 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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				are recognised and provided for realised in the Kaipara District.” AND Any further necessary consequential amendments required.			
149.15	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-O1	Amend	AMEND REG-O1 as follows: The benefits of increasing renewable electricity generation activities at all scales are realised recognised. AND Any consequential amendments and alternative relief to address the concerns raised.	REG-O1 needs to be moderated as, in some cases, the benefits of enabling renewable electricity generation cannot be 'realised' due to there being significant adverse environmental effects which need to be avoided to achieve the purpose of the RMA. The submitter requests that 'recognised' is used in place of 'realised' to moderate REG-O1 and align it with the National Policy Statement for Renewable Electricity Generation (NPS-REG).	Accept in part	Section 5.2.2 Topic 3: REG Objectives
FS77.19	Mercury NZ Limited	REG-O1	Oppose	Reject the relief sought.	The submitter considers ‘recognised’ to be weak, passive language which fails to give effect to NPS-REG Policy A. ‘Realised’ is preferred as it is an active word which reflects necessity to build projects, not merely think about them.	Accept in part	Section 5.2.2 Topic 3: REG Objectives
326.1	Mercury NZ Limited	REG-O1	Support	RETAIN REG-O1. OR AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).	The submitter generally supports REG-O1 and considers it to be consistent with the National Policy Statement for Renewable Electricity Generation. However, Government's recent consultation on National Policy Statement for Renewable Electricity Generation amendments	Accept	Section 5.2.1 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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					<p>has resulted in more directive provisions being proposed to support NZ's climate change and electrification goals.</p> <p>As such, alternative relief is sought to provide scope for amendments to Renewable Electricity Generation objectives to reflect terminology and future National Policy Statement for Renewable Electricity Generation changes.</p>		
FS93.234	Royal Forest and Bird Protection Society of NZ	REG-O1	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 5.2.1 Topic 3: REG Objectives
149.16	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-O2	Amend	<p>AMEND REG-O2 as follows: Renewable electricity generation activities are enabled at all scales to <u>where they</u> support the environmental, economic, social and cultural well-being of people and communities in the Kaipara District.</p> <p>AND Any consequential amendments and alternative relief to address the concerns raised.</p>	REG-O2 needs to be moderated by changing 'to' to 'where' in order to align it with the National Policy Statement for Renewable Electricity Generation (NPS-REG).	Reject	Section 5.2.2 Topic 3: REG Objectives
FS77.20	Mercury NZ Limited	REG-O2	Oppose	Reject the relief sought.	The submitter considers active wording is required to reflect the climate crisis and necessity to build projects, not merely think about them.	Accept	Section 5.2.2 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation



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326.2	Mercury NZ Limited	REG-O2	Support	RETAIN REG-O2. OR AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).	The submitter generally supports REG-O2 and considers it to be consistent with the National Policy Statement for Renewable Electricity Generation. However, Government's recent consultation on National Policy Statement for Renewable Electricity Generation amendments has resulted in more directive provisions being proposed to support New Zealand's climate change and electrification goals. As such, alternative relief is sought to provide scope for amendments to Renewable Electricity Generation objectives to reflect terminology and future National Policy Statement for Renewable Electricity Generation changes.	Accept	Section 5.2.1 Topic 3: REG Objectives
FS93.235	Royal Forest and Bird Protection Society of NZ	REG-O2	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 5.2.1 Topic 3: REG Objectives
283.44	Northpower Limited and Northpower Fibre Limited	REG-O2	Amend	AMEND the title of REG-O2 to read as follows: "REG-O2: Enabling Renewable electricity generation <u>Activities</u> to Support Wellbeing" AND Any further necessary consequential amendments required.	The submitter supports this objective, and objective title with the amended changes sought to be in alignment with Policy 5.4.1 of the Northland Regional Policy Statement.	Accept	Section 5.2.2 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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309.25	Clarus	REG-O2	Amend	<p>AMEND REG-O2 as follows: Renewable electricity generation activities and other renewable energy production and supply...</p> <p>AND</p> <p>AMEND the objective name of REG-O2 accordingly.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.53	Channel Terminal Services Ltd	REG-O2	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG objectives where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
304.40	Director General of Conservation	REG-O3	Amend	<p>AMEND REG-O3 as follows: Renewable electricity generation activities are developed in a way that will avoid, remedy or mitigate appropriately manages adverse effects on the environment.</p> <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	REG-O3 requires amendment to outline that adverse effects should be avoided, remedied, or mitigated.	Reject	Section 5.2.2 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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FS93.150	Royal Forest and Bird Protection Society of NZ	REG-O3	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 5.2.2 Topic 3: REG Objectives
FS77.13	Mercury NZ Limited	REG-O3	Oppose	Reject the relief sought.	Robust effects management is supported; however, a directive to “avoid, remedy or mitigate” all adverse effects is inconsistent with the NPS-REG. The submitter requests REG-O3 is retained as notified or amended to reflected NPS-REG Objective A. Reference to unavoidable effects, offsets and compensation should be contained within policies, not objectives.	Accept	Section 5.2.2 Topic 3: REG Objectives
283.45	Northpower Limited and Northpower Fibre Limited	REG-O3	Amend	AMEND the title of REG-O3 to read as follows: "REG-O3: Managing adverse effects of renewable electricity generation <u>activities</u> " AND Any further necessary consequential amendments required.	The submitter supports this objective, and objective title with the amended changes sought to be in alignment with Policy 5.4.1 of the Northland Regional Policy Statement.	Reject	Section 5.2.2 Topic 3: REG Objectives
309.26	Clarus	REG-O3	Amend	AMEND REG-O3, as follows: ...renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the objective name of REG-O3 accordingly.	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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				AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.			
FS41.54	Channel Terminal Services Ltd	REG-O3	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG objectives where the amendment improves consistency, clarity and functionality of provisions. The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
308.12	Fire and Emergency New Zealand	REG-O3	Support	RETAIN REG-O3 as notified.	Objective is supported to the extent that renewable electricity generation activities are developed in a way that appropriately managed adverse effects on the environment. This would include minimising and managing any fire risk associated with this activity to protect the assets and surrounding environment.	Accept in part	Section 5.2.2 Topic 3: REG Objectives
326.3	Mercury NZ Limited	REG-O3	Support	RETAIN REG-O3. OR AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).	The submitter generally supports REG-O3 and considers it to be consistent with the National Policy Statement for Renewable Electricity Generation. However, Government's recent consultation on National Policy Statement for Renewable Electricity Generation amendments has resulted in more directive	Accept	Section 5.2.1 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation



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					<p>provisions being proposed to support New Zealand's climate change and electrification goals.</p> <p>As such, alternative relief is sought to provide scope for amendments to Renewable electricity generation objectives to reflect terminology and future National Policy Statement for Renewable Electricity Generation changes.</p>		
FS93.236	Royal Forest and Bird Protection Society of NZ	REG-O3	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 5.2.1 Topic 3: REG Objectives
326.4	Mercury NZ Limited	REG-O4	Support	<p>RETAIN REG-O4. OR AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).</p>	<p>The submitter generally supports REG-O4 and considers it to be consistent with the National Policy Statement for Renewable Electricity Generation. However, Government's recent consultation on National Policy Statement for Renewable Electricity Generation amendments has resulted in more directive provisions being proposed to support New Zealand's climate change and electrification goals.</p> <p>As such, alternative relief is sought to provide scope for amendments to Renewable electricity generation objectives to reflect terminology and future National Policy Statement for Renewable Electricity Generation changes.</p>	Accept	Section 5.2.1 Topic 3: REG Objectives

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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FS93.237	Royal Forest and Bird Protection Society of NZ	REG-O4	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 5.2.2 Topic 3: REG Objectives
283.46	Northpower Limited and Northpower Fibre Limited	REG-O4	Support	RETAIN REG-O4 as notified.	The submitter supports this objective.	Accept in part	Section 5.2.2 Topic 3: REG Objectives
309.27	Clarus	REG-O4	Amend	AMEND REG-O4, as follows: ...renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the objective name of REG-O4 accordingly. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.55	Channel Terminal Services Ltd	REG-O4	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG objectives where the amendment improves consistency, clarity and functionality of provisions. The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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309.29	Clarus	REG Policies	Amend	<p>ADD new Policy after REG-P2, as follows: <u>REG-Pxx Enable the effective development, operation, maintenance and upgrade of non-electrical renewable energy activities.</u></p> <p><u>Provide for the effective and efficient development, operation, maintenance and upgrading of activities associated with renewable gas and liquid energy, biomass, process heat and other non-electrical energy sources at a range of scales.</u></p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	A further policy is required to provide support for renewable energy development other than electricity.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.57	Channel Terminal Services Ltd	REG Policies	Support	Accept the relief sought by the submitter with further amendments as requested.	<p>The addition of provisions which recognise and provide for the generation, processing and distribution of non-electrical renewable energy (e.g., biofuels and e-fuels) is supported.</p> <p>The submitter requests that the new policy should also include to “repair” to achieve consistency with other enabling INF and REG provisions.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS45.111	Director General of Conservation	REG Policies	Oppose in part	Reserves position.	The submitter is concerned with the effects associated with enabling non-electrical renewable energy activities in relation to RMA section 6(c).	Accept in part	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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309.28	Clarus	REG-P1	Amend	<p>AMEND REG-P1 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities <u>and other renewable energy production and supply...</u></p> <p>AND</p> <p>AMEND the policy name accordingly.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.56	Channel Terminal Services Ltd	REG-P1	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
283.47	Northpower Limited and Northpower Fibre Limited	REG-P1	Support	RETAIN REG-P1 as notified.	The submitter supports this policy.	Accept in part	Section 6.2.1 Topic 4: REG Policies
145.1	Electrify Te Taitokerau	REG-P1	Amend	<p>ADD the following benefit to REG-P1 - <u>Reduced dependence on imported fossil fuels and related fiscal deficits and supply chain risks.</u></p>	The submitter supports REG-P1 in part but requests the inclusion of an additional benefit to acknowledge the need to transition energy supply from finite fossil fuels to renewable sources, in order to reduce	Accept	Section 6.2.2 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					emissions and costs while ensuring a resilient and secure supply of onshore energy.		
FS82.20	Northpower Limited	REG-P1	Support	Accept the relief sought.	Supports the addition as it aligns with NPS-REG Policy A.	Accept	Section 6.2.2 Topic 4: REG Policies
326.5	Mercury NZ Limited	REG-P1	Support	RETAIN REG-P1. OR AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).	The submitter generally supports REG-P1 and considers it to be consistent with the National Policy Statement for Renewable Electricity Generation. However, Government's recent consultation on National Policy Statement for Renewable Electricity Generation amendments has resulted in more directive provisions being proposed to support New Zealand's climate change and electrification goals. As such, alternative relief is sought to provide scope for amendments to Renewable electricity generation objectives to reflect terminology and future National Policy Statement for Renewable electricity generation changes.	Accept	Section 6.2.1 Topic 4: REG Policies
FS93.238	Royal Forest and Bird Protection Society of NZ	REG-P1	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 6.2.1 Topic 4: REG Policies
332.5	Northland Regional Council	REG-P1	Amend	RETAIN REG-P1.1. and REG-P1.2. AND	The submitter supports clauses 1 and 2 of REG-P1 as these outline the benefits of renewable energy and the	Accept	Section 6.2.2

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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				AMEND REG-P1.3. to include environmental benefits, as well as economic, social and cultural benefits to people and communities.	goal to maintain and increase the security, resilience, independence, diversity and affordability of electricity within Kaipara. Clause 3, however, does not include reference to the environmental benefits of renewable energy generation.		Topic 4: REG Policies
145.2	Electrify Te Taitokerau	REG-P2	Amend	AMEND REG-P2 to include biomass, tidal, wave and ocean energy resources.	The submitter supports REG-P2 in part and requests the proactive addition of biomass, tidal, wave and ocean as well as solar and wind energy resources. There is potential for electricity generation from farming biomass, tidal activity and wave and ocean activity within the Kaipara Harbour and along the Kaipara District's coasts. The submitter considers the inclusion of a range of renewable sources will allow for the likely discoveries and technological advancements over the Plan's lifespan.	Accept in part	Section 6.2.3 Topic 4: REG Policies
FS82.21	Northpower Limited	REG-P2	Support	Accept the relief sought.	Supports the addition as it aligns with NPS-REG Policy E1.	Accept in part	Section 6.2.3 Topic 4: REG Policies
332.6	Northland Regional Council	REG-P2	Amend	AMEND REG-P2 as follows: Provide for the effective and efficient development, operation, maintenance and upgrading of renewable electricity generation activities at a range of scales from solar and wind energy resources <u>renewable energy sources, e.g. solar and wind.</u>	The submitter requests that REG-P2 is amended to enable a range of renewable energy activities in order to recognise the rapid rate at which technology is evolving.	Accept in part	Section 6.2.3 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

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326.6	Mercury NZ Limited	REG-P2	Amend	AMEND REG-P2 as follows: Enable the effective development, operation, maintenance and upgrade of renewable electricity generation activities. Provide for the effective and efficient development, operation, maintenance, and upgrading and repowering of renewable electricity generation activities at a range of scales, from and prioritising access to solar and wind energy resources.	The submitter supports REG-P2 in part but requests amendments to strengthen the provision by specifically referencing and prioritising access to solar and wind energy resources. Adding reference to 'repowering' supports the addition of a repowering rule, as sought by the submitter (refer other submissions). It is noted that the Kaipara District has areas with high wind speeds - refer to the map attached to the submission as Appendix 1.	Reject	Section 6.2.3 Topic 4: REG Policies
FS93.239	Royal Forest and Bird Protection Society of NZ	REG-P2	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept	Section 6.2.3 Topic 4: REG Policies
283.48	Northpower Limited and Northpower Fibre Limited	REG-P2	Amend	AMEND the title and content of REG-P2 as follows: “REG-P2: Enable the effective development, operation, maintenance, repair and upgrade of renewable electricity generation activities” " Recognise and provide for the effective and efficient development, operation, maintenance, repair and upgrading of renewable electricity generation activities at a range of scales from solar and wind energy resources.” AND Any further necessary consequential amendments required.	To be consistent with the previous objectives and policies in the Proposed District Plan, and to Policy 5.4.1 of the Northland Regional Policy Statement. No reasoning for the word 'repair' to be included within the title and policy has been provided.	Reject	Section 6.2.3 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
292.26	Transpower New Zealand Limited	REG-P2	Amend	<p>AMEND REG-P2 as follows:</p> <p>REG-P2 Enable the effective development, operation, maintenance and upgrade of renewable electricity generation activities</p> <p>Provide for <u>Enable</u> the effective and efficient development, operation, maintenance and upgrading of renewable electricity generation activities at a range of scales from solar and wind energy resources.</p> <p>AND</p> <p>Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p>	<p>To ensure consistency with the terminology in the policy title, and the policy content.</p> <p>To ensure the policy is consistent with REG-O2.</p>	Accept	Section 6.2.3 Topic 4: REG Policies
FS77.10	Mercury NZ Limited	REG-P2	Support	Accept the relief sought.	“Enable” accurately reflects the NPS-REG directive to provide for new and existing renewable electricity generation.	Accept	Section 6.2.3 Topic 4: REG Policies
FS93.80	Royal Forest and Bird Protection Society of NZ	REG-P2	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 6.2.3 Topic 4: REG Policies
145.3	Electrify Te Taitokerau	REG-P3	Amend	AMEND REG-P3 to include biomass, tidal, wave and ocean energy resources.	The submitter supports REG-P3 in part and requests the proactive addition of biomass, tidal, wave and ocean as well as solar and wind energy resources. There is potential for electricity generation from farming biomass, tidal activity and wave and ocean activity within the Kaipara Harbour and along the Kaipara	Accept in part	Section 6.2.3 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					District's coasts. The submitter considers the inclusion of a range of renewable sources will allow for the likely discoveries and technological advancements over the Plan's lifespan.		
FS82.22	Northpower Limited	REG-P3	Support	Accept the relief sought.	Supports the addition as it aligns with NPS-REG Policy E1.	Accept in part	Section 6.2.3 Topic 4: REG Policies
283.49	Northpower Limited and Northpower Fibre Limited	REG-P3	Support	RETAIN REG-P3 as notified.	The submitter supports this policy.	Accept in part	Section 6.2.1 Topic 4: REG Policies
309.98	Clarus	REG-P3	Amend	AMEND REG-P3 wherever the term "renewable electricity generation" appears to: ...renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the policy name accordingly. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.60	Channel Terminal Services Ltd	REG-P3	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.		
326.7	Mercury NZ Limited	REG-P3	Amend	<p>AMEND REG-P3 as follows:</p> <p>Recognise and provide for the operational need or functional need of renewable electricity generation activities to be in particular environments, including:</p> <ol style="list-style-type: none"> To be where the wind and solar energy resource is located and <u>to maximise solar gain</u>; To be in close proximity to transmission and distribution networks or its end use; and <p>To have sufficient land to support at <u>ancillary</u> renewable electricity generation activities.</p>	REG-P3 is supported in part. The terms functional need and operational need are defined in the National Planning Standards and the addition of these definitions within the Proposed District Plan is supported along with this policy. Two amendments are sought to improve clarity.	Reject	Section 6.2.3 Topic 4: REG Policies
FS93.240	Royal Forest and Bird Protection Society of NZ	REG-P3	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept	Section 6.2.3 Topic 4: REG Policies
332.7	Northland Regional Council	REG-P3	Amend	<p>AMEND REG-P3 as follows:</p> <ol style="list-style-type: none"> To be where the wind and solar <u>renewable</u> energy resource is located <u>e.g. wind and solar</u>; To be in close proximity to transmission and distribution networks or its end use; and 	District plan policies should enable a range of renewable energy activities as technology continues to evolve (i.e., not just wind and solar). The submitter seeks that REG-P3 be amended to include all possible renewable electricity sources which might be viable over the lifetime of the plan. Moreover, it is noted that	Reject	Section 6.2.3 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				3. To have sufficient space land to support all renewable electricity generation activities.	renewable electricity generation can occur in 'space' rather than just on 'land' and this should be provided for (e.g., roof-mounted solar panels).		
326.8	Mercury NZ Limited	REG-P4	Amend	<p>AMEND REG-P4.2.b. as follows:</p> <p>b. Screening and setbacks <u>Separation</u> from sensitive activities;</p> <p>OR</p> <p>AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).</p>	<p>The submitter supports REG-P4 in part as it recognises that Renewable electricity generation delivers nationally significant benefits on all scales, and that priority should be given to national benefit over adverse local effects. Offsetting or compensation should not be required to demonstrate net gain or no net loss but should minimise net residual effect to a reasonable achievable extent while still meeting functional and operational need.</p> <p>It is noted that, with recent consultation on the National Policy Statement for Renewable Electricity Generation amendments, directive provisions have been proposed to aid in NZ's climate change and electrification goals. Alternative relief is therefore sought to provide scope for provisions to be amended to reflect terminology and changes to the National Policy Statement for Renewable Electricity Generation in future.</p>	Reject	Section 6.2.4 Topic 4: REG Policies
FS93.241	Royal Forest and Bird Protection Society of NZ	REG-P4	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 6.2.4 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
FS45.113	Director General of Conservation	REG-P4	Oppose	Disallow the original submission.	Separation does not provide a clear measure when compared to screening and setbacks.	Reject	Section 6.2.4 Topic 4: REG Policies
149.17	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-P4	Oppose	<p>AMEND REG-P4 as follows: Manage the adverse effects of renewable electricity generation activities by:</p> <ol style="list-style-type: none"> 1. Recognising that there will <u>may</u> be unavoidable adverse effects on the environment from renewable electricity generation activities; 2. <u>Considering whether the proposed location is appropriate having regard to the scale of adverse effects</u> 2-3. Implementing effective mitigation measures, which may include: <ol style="list-style-type: none"> a. Appropriate location and design; b. Screening and setbacks from sensitive activities; c. Adaptive management measures; d. Rehabilitation of the site at the end of its operational life; and 3-4. Having regard to any proposed offsetting or compensation measures for <u>residual</u> adverse effects that cannot practically be avoided, remedied or mitigated. <p>AND</p> <p>DELETE REG-P4.3 (would be renumbered '4' as per amendments requested above). OR</p> <p>AMEND REG-P4 to include a reference to other relevant chapters such as</p>	<p>The submitter opposes REG-P4 as proposed and considers it to be inappropriate and risks undermining effects management frameworks under the RMA and National Policy Statement for Renewable Electricity Generation (NPS-REG). Stating there will be unavoidable effects pre-emptively justifies adverse outcomes otherwise avoided, remedied or mitigated. It is considered that this approach is inconsistent with Section 5(2)(c) of the act.</p> <p>The NPS-REG expressly supports the development of renewable electricity generation but not at the expense of managing environmental effects. NPS-REG Policy C2 requires that decision-makers have particular regard to offsetting and environmental compensation measures for any residual adverse effects after avoidance, mitigation and remediation.</p> <p>REG-P4 should enable the consideration of sensitive environments (e.g., riparian margins, Coastal Environment, Outstanding Natural Features and Landscapes, and indigenous habitats), in which</p>	Accept in part	Section 6.2.4 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>Ecosystems and Biodiversity which set out how and which effects are to be avoided, remedied or mitigated.</p> <p>AND</p> <p>PROVIDE clarity as to what offsetting and compensation can be provided by REG-P4 and whether this is intended to be biodiversity offsetting.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>locating activities may be inappropriate.</p> <p>The submitter also opposes the use of practicably in REG-P4(3) and considers this inappropriate and inconsistent with the RMA and NPS-REG. Neither uses 'practicable' as a qualifier to manage adverse effects. Moreover, the word introduces ambiguity into the provision and could allow financial considerations to override the application of effects management frameworks - as set out elsewhere in the plan. To be consistent with Policy C2 of the NPS-REG, REG-P4 should also refer to residual effects.</p>		
FS45.34	Director General of Conservation	REG-P4	Support	Allow the original submission.	<p>Supports the proposed wording as it requires consideration of the appropriateness of locality in relation to the scale of effects, as well as including residual effects.</p> <p>The additions sought can be incorporated alongside the changes sought in the submitter’s submission point 304.41.</p>	Accept in part	Section 6.2.4 Topic 4: REG Policies
FS77.18	Mercury NZ Limited	REG-P4	Oppose	Reject the relief sought.	<p>Supports the original submitter’s desire for REG-P4 to address residual effects and to align with offsetting and compensation frameworks under both the NPS-REG and NPS-IB.</p> <p>However, wording capable of predetermining renewable electricity</p>	Accept in part	Section 6.2.4 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					projects are “not appropriate” in some locations is opposed. The submitter considers that its requested amendments to REG-P4 are appropriate.		
309.99	Clarus	REG-P4	Amend	AMEND REG-P4 wherever the term "renewable electricity generation" appears to: ...renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the policy name accordingly. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.61	Channel Terminal Services Ltd	REG-P4	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions. The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
304.41	Director General of Conservation	REG-P4	Amend	AMEND REG-P4 as follows: 1. Recognising that there will be unavoidable adverse effects on the	The submitter requests that REG-P4 is amended to align with REG-O3 (subject to REG-O3 being amended as requested by the submitter). The RMA requires activities apply an effects	Accept in part	Section 6.2.4 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>environment from renewable electricity generation activities;</p> <p>2. Implementing effective mitigation measures to avoid, remedy or mitigate <u>adverse effects</u> which may include:</p> <ul style="list-style-type: none"> a. Appropriate location and design; <u>Locating large-scale renewable electricity generation activities outside of sensitive Overlay areas;</u> b. Screening and setbacks from sensitive activities; Adaptive management measures; c. Rehabilitation of the site at the end of its operational life; and <p>3. Having regard to any proposed offsetting or compensation measures for adverse effects that cannot practicably be avoided, remedied or mitigated, <u>when those measures are in accordance with Appendix X.</u></p> <p>AND</p> <p>Any alternative or consequential relief.</p>	<p>management hierarchy starting with avoidance. As activities can be avoided by not occurring, REG-P4 should not recognise unavoidable effects.</p> <p>Moreover, amendments are sought to provide stronger guidance to discourage largescale renewable energy generation activities being located in sensitive overlay areas (the submitter's reference to 'Overlay' in REG-P4.2.b. is regarding the inclusion of Significant Natural Areas sought by the submitter).</p>		
FS93.151	Royal Forest and Bird Protection Society of NZ	REG-P4	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 6.2.4 Topic 4: REG Policies
FS77.14	Mercury NZ Limited	REG-P4	Oppose	Reject the relief sought.	The submitter supports REGP4, subject to the amendments requested in submission point S326.8. However, wording that expressly directs large-scale renewable electricity generation activities to be located outside of	Accept in part	Section 6.2.4 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					sensitive Overlay areas is opposed as a matter of policy principle. Renewable resources are often located within high landscape or ecological value areas (e.g., wind or hydrological resources). To have a policy preclude large-scale generation from overlay areas is at risk of sterilising resources and inconsistent with the NPS-REG.		
283.50	Northpower Limited and Northpower Fibre Limited	REG-P4	Support	RETAIN REG-P4 as notified.	The submitter supports this policy.	Accept in part	Section 6.2.1 Topic 4: REG Policies
308.13	Fire and Emergency New Zealand	REG-P4	Support	RETAIN REG-P4 as notified.	Policy is supported to the extent that adverse effects are to be managed through the implementation of effective mitigation measures, which may include appropriate location and design, setbacks from sensitive activities and adaptive management measures. Such measures would minimise any fire risk associated with this activity.	Accept in part	Section 6.2.4 Topic 4: REG Policies
283.51	Northpower Limited and Northpower Fibre Limited	REG-P5	Support	RETAIN REG-P5 as notified.	The submitter supports this policy.	Accept	Section 6.2.1 Topic 4: REG Policies
304.42	Director General of Conservation	REG-P5	Amend	ADD the following clause to REG-P5 as follows: When considering proposed small-scale and community-scale renewable	REG-P5 should be amended to address cumulative adverse effects of small and community scale	Reject	Section 6.2.5 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>electricity generation activities, have particular regard to:</p> <ol style="list-style-type: none"> 1. The comparatively lower level of environmental effects that result from small scale and community scale renewable electricity generation activities; and 2. <u>Avoiding or minimising adverse effects on sensitive values in Overlay areas;</u> <u>and</u> 3. ... <p>AND</p> <p>Any alternative or consequential relief.</p>	electricity generation on sensitive values.		
FS93.152	Royal Forest and Bird Protection Society of NZ	REG-P5	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 6.2.5 Topic 4: REG Policies
309.100	Clarus	REG-P5	Amend	<p>AMEND REG-P5 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities <u>and other renewable energy production and supply...</u></p> <p>AND</p> <p>AMEND the policy name accordingly.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
FS41.62	Channel Terminal Services Ltd	REG-P5	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
309.101	Clarus	REG-P6	Amend	<p>AMEND REG-P6 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities <u>and other renewable energy production and supply...</u></p> <p>AND</p> <p>AMEND the policy name accordingly.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.63	Channel Terminal Services Ltd	REG-P6	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
283.52	Northpower Limited and Northpower Fibre Limited	REG-P6	Support	RETAIN REG-P6 as notified.	The submitter supports this policy.	Reject	Section 6.2.1 Topic 4: REG Policies
304.43	Director General of Conservation	REG-P6	Amend	AMEND REG-P6 as follows: Enabling Considering large scale renewable electricity generation activities AND Any alternative or consequential relief.	The term 'enabling' is unsuitable for a policy about 'considering' large scale renewable energy generation proposals and having particular regard to their national and regional benefits.	Reject	Section 6.2.5 Topic 4: REG Policies
FS93.153	Royal Forest and Bird Protection Society of NZ	REG-P6	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 6.2.5 Topic 4: REG Policies
FS77.15	Mercury NZ Limited	REG-P6	Oppose	Reject the relief sought.	Opposes the removal of “Enabling” from the REG-P6 as the NPS-REG clearly requires councils to “provide for” and “enable” the development, operation, maintenance and upgrading of renewable electricity generation. To frame REG-P6 as a mere ‘consideration’ of such activities may signal a neutral or restrictive stance toward large-scale generation.	Accept	Section 6.2.5 Topic 4: REG Policies
FS82.24	Northpower Limited	REG-P6	Oppose	Reject the relief sought.	The submitter does not consider ‘considering’ is a suitable term. The notified wording should be retained as it is clear and directive.	Accept	Section 6.2.5 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
326.9	Mercury NZ Limited	REG-P6	Amend	<p>AMEND REG-P6 as follows: Enabling large scale renewable electricity generation activities. When considering proposed large scale renewable electricity generation activities, have particular regard to the national and regional significance of renewable electricity generation activities that connect to the National Grid or local distribution network. Recognise and provide for the national significance and benefits of renewable electricity generation activities.</p>	The submitter supports REG-P6 in part but considers that all renewable electricity generation, regardless of scale, contribute to achieving National Policy Statement for Renewable Electricity Generation objectives.	Reject	Section 6.2.5 Topic 4: REG Policies
FS82.23	Northpower Limited	REG-P6	Support	Accept the relief sought.	All renewable electricity generation, regardless of scale, contributes to achieving NPS-REG objectives.	Reject	Section 6.2.5 Topic 4: REG Policies
FS93.242	Royal Forest and Bird Protection Society of NZ	REG-P6	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept	Section 6.2.5 Topic 4: REG Policies
326.10	Mercury NZ Limited	REG-P7	Support	RETAIN REG-P7 as notified.	The submitter supports REG-P7 and sees innovation and technological advancement as being critical to New Zealand meeting climate change and decarbonisation goals.	Accept	Section 6.2.6 Topic 4: REG Policies
FS93.243	Royal Forest and Bird Protection Society of NZ	REG-P7	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 6.2.6 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
283.53	Northpower Limited and Northpower Fibre Limited	REG-P7	Support	RETAIN REG-P7 as notified.	The submitter supports this policy.	Accept	Section 6.2.1 Topic 4: REG Policies
309.102	Clarus	REG-P7	Amend	AMEND REG-P7 wherever the term "renewable electricity generation" appears to: ...renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the policy name accordingly. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.64	Channel Terminal Services Ltd	REG-P7	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions. The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
283.54	Northpower Limited and Northpower Fibre Limited	REG-P8	Amend	AMEND REG-P8 as follows: “Recognise <u>and provide for</u> the benefits of enabling the repowering of existing wind and solar generation activities, including: ...”	To include the benefits of enabling the repowering of existing wind and solar generation activities.	Reject	Section 6.2.7 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				AND Any further necessary consequential amendments as required.			
149.18	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-P8	Amend	<p>AMEND REG-P8 as follows: Recognise the benefits of enabling the repowering of existing wind and solar renewable electricity generation activities, including:</p> <ol style="list-style-type: none"> 1. Efficient use of existing infrastructure; and 2. Potential for delivering increased renewable electricity generation output within an existing renewable electricity generation site. <p><u>Where repowering increases the magnitude and scale of effects, avoid, remedy or mitigate any adverse effects on the environment in accordance with REG-P4.</u></p> <p>AND Any consequential amendments and alternative relief to address the concerns raised.</p>	The submitter opposes REG-P8 in part as repowering can increase the scale of renewable electricity generation activities, therefore potentially increasing the scale of associated effects. REG-P8 must recognise this and provide adequate direction.	Reject	Section 6.2.7 Topic 4: REG Policies
FS45.35	Director General of Conservation	REG-P8	Support	Allow the original submission.	Supports reference to REG-P4.	Reject	Section 6.2.7 Topic 4: REG Policies
FS77.21	Mercury NZ Limited	REG-P8	Oppose	Reject the relief sought.	The submitter acknowledges that repowering can change the scale and intensity of effects and agrees that policies should guide how effects are managed. Wording should not,	Accept	Section 6.2.7 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>however, constrain repowering where it delivers materially greater renewable output from an existing site (as expressly encouraged by NPS-REG) nor should it preclude temporary investigation activities in sensitive locations where appropriate design and mitigation can be employed.</p> <p>The submitter requests that REG-P8 clearly recognises the benefits of repowering existing generation sites, while requiring proportional management of effects.</p>		
326.11	Mercury NZ Limited	REG-P8	Amend	<p>AMEND REG-P8 as follows: Repowering of existing wind and solar generation activities Recognise the benefits of enabling the repowering of existing wind and solar generation activities, including:</p> <ol style="list-style-type: none"> 1. Efficient use of existing infrastructure; and 2. Potential for delivering increased renewable electricity generation output within an existing renewable electricity generation site. 	<p>Repowering provides opportunities to increase generation output and extend the renewable electricity generation asset's operational life. In the context of repowering, the submitter notes that the renewable electricity generation activity would form part of the existing environment, particularly the landscape, and communities would be familiar with operations. As such, amendments are sought to clarify REG-P8 by removing reference to the site and placing emphasis on the delivery of increased generation.</p>	Accept in part	Section 6.2.7 Topic 4: REG Policies
FS45.114	Director General of Conservation	REG-P8	Oppose	Disallow the original submission.	The outcome sought by the submitter is unclear.	Accept in part	Section 6.2.7 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
FS93.244	Royal Forest and Bird Protection Society of NZ	REG-P8	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept in part	Section 6.2.7 Topic 4: REG Policies
326.12	Mercury NZ Limited	REG-P9	Support	RETAIN REG-P9 as notified.	Sensitive activities moving to areas where renewable electricity generation activities exist has the potential to constrain operations, therefore resulting in a loss of output and operational flexibility. The submitter believes that maintaining renewable electricity generation output on all scales key to achieving objectives, including REG-O1 and REG-O2.	Accept in part	Section 6.2.8 Topic 4: REG Policies
FS93.245	Royal Forest and Bird Protection Society of NZ	REG-P9	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept in part	Section 6.2.8 Topic 4: REG Policies
283.55	Northpower Limited and Northpower Fibre Limited	REG-P9	Amend	AMEND the title and contents of REG-P9 as follows: "REG-P9: Managing Avoiding reverse sensitivity" Manage Avoid reverse sensitivity effects by: 1. Requiring new sensitive activities to be designed and located to avoid, or otherwise mitigate , reverse sensitivity effects on existing renewable electricity generation activities; and 2. Requiring new renewable electricity generation activities to manage	The wording of this policy is inconsistent with objective REG-O4 and does not give effect to the Northland Regional Policy Statement (5.1.1) which requires the potential for reverse sensitivity to be avoided. Using the words "or otherwise mitigate" does not give effect to the "avoid" directive in the Regional Policy Statement.	Accept in part	Section 6.2.8 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>adverse effects on existing sensitive activities in close proximity.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>			
292.27	Transpower New Zealand Limited	REG-P9	Amend	<p>AMEND REG-P9 as follows:</p> <p>Manage reverse sensitivity effects by:</p> <ol style="list-style-type: none"> 1. Requiring new sensitive activities to be designed and located to avoid, or otherwise mitigate, reverse sensitivity effects on existing renewable electricity generation activities; and 2. Requiring new renewable electricity generation activities to manage adverse <u>reverse sensitivity</u> effects on existing sensitive activities in close proximity. <p>OR</p> <p>DELETE REG-P9.</p> <p>AND</p> <p>Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p>	REG-P9 is intended to manage reverse sensitivity effects, both subclauses should refer to reverse sensitivity effects only. As drafted sub clause 2 refers to all adverse effects of renewable generation activities, when these are addressed in REG-P4.	Accept in part	Section 6.2.8 Topic 4: REG Policies
FS82.25	Northpower Limited	REG-P9	Support	Accept the relief sought.	Notwithstanding the relief sought by way of the submitter’s original submission (283.49), REG-P9 should not require new renewable electricity generation activities to manage all adverse effects on existing sensitive activities.	Accept in part	Section 6.2.8 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation



Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
309.103	Clarus	REG-P9	Amend	<p>AMEND REG-P9 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities <u>and other renewable energy production and supply...</u></p> <p>AND</p> <p>AMEND the policy name accordingly.</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.65	Channel Terminal Services Ltd	REG-P9	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
309.104	Clarus	REG-P10	Amend	<p>AMEND REG-P10 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities <u>and other renewable energy production and supply...</u></p> <p>AND</p> <p>AMEND the policy name accordingly.</p> <p>AND</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.			
FS41.66	Channel Terminal Services Ltd	REG-P10	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG policies where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
283.56	Northpower Limited and Northpower Fibre Limited	REG-P10	Support	RETAIN REG-P10 as notified.	The submitter supports this policy.	Accept in part	Section 6.2.1 Topic 4: REG Policies
326.13	Mercury NZ Limited	REG-P10	Amend	AMEND REG-P10 as follows: Investigation of new renewable electricity generation sites and <u>r</u> esources Enable activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation (i.e. wind monitoring masts), recognising both the need for flexibility and the temporary nature of any adverse effects of these activities.	Supports REG-P10 in part but requests amendments to make the policy more concise so it is directive and consistent with REG-O2.	Reject	Section 6.2.9 Topic 4: REG Policies
FS93.246	Royal Forest and Bird Protection Society of NZ	REG-P10	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept	Section 6.2.9 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
149.19	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-P10	Oppose	<p>AMEND REG-P10 to make the reference to 'the need for flexibility' clearer, AND AMEND REG-P10 as follows:</p> <p>Enable activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation (i.e. wind monitoring masts), recognising:</p> <ol style="list-style-type: none"> both the need for flexibility and the temporary nature of any adverse effects of these activities- <u>that in some sensitive locations and environments such activities will not be appropriate.</u> <p>AND Any consequential amendments and alternative relief to address the concerns raised.</p>	The submitter opposes REG-P10 and requests amendments for clarity. The investigation of new sites and sources can decide the location of renewable electricity generation activities. In some areas, such activities will be inappropriate. E.g. within an Outstanding Natural Features or Landscape, the Coastal Environment or areas featuring significant indigenous vegetation. REG-P10 requires amendment to recognise this. Moreover, it is unclear as to why there is reference to ‘the need for flexibility’, and what matters require flexibility.	Accept in part	Section 6.2.9 Topic 4: REG Policies
FS45.36	Director General of Conservation	REG-P10	Support	Allow the original submission.	Supports the inclusion of consideration for sensitive locations and environments as REG activities are not appropriate in such areas.	Accept in part	Section 6.2.9 Topic 4: REG Policies
FS77.22	Mercury NZ Limited	REG-P10	Oppose	Reject the relief sought.	The submitter acknowledges that repowering can change the scale and intensity of effects and agrees that policies should guide how effects are managed. Wording should not, however, constrain repowering where it delivers materially greater	Accept in part	Section 6.2.9 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation



Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>renewable output from an existing site (as expressly encouraged by NPS-REG) nor should it preclude temporary investigation activities in sensitive locations where appropriate design and mitigation can be employed.</p> <p>The submitter requests that REG-P10 retains its strong enabling framework for temporary investigation structures, including in sensitive environments, subject to appropriate standards and existing overlay frameworks instead of stating such activities “will not be appropriate” in certain areas.</p>		
FS82.26	Northpower Limited	REG-P10	Oppose	Reject the relief sought.	<p>The submitter does not consider sites containing Outstanding Natural Features, Outstanding Natural Landscapes or Significant Indigenous Vegetation, or sites located within the Coastal Environment are inappropriate for renewable electricity generation activities.</p> <p>Such activities must be located where the required resource is best available. To imply such activities are inappropriate in sensitive environments is inconsistent with higher order national direction, including the NPS-REG and Northland Regional Policy Statement.</p>	Accept in part	Section 6.2.9 Topic 4: REG Policies

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
294.8	Birt & Currie Surveyors Limited	REG Rules	Support	RETAIN the permitted activity status for renewable energy land use in the Rural Zone.	Submitter supports the permitted status.	Accept	Section 7.2.1 Topic 5: REG Rules
145.4	Electrify Te Taitokerau	REG Rules	Amend	DELETE the matters of discretion relating to "visual and landscape effects" from all Renewable electricity generation rules with matters over which discretion is restricted (i.e., REG-R1, REG-R3, REG-R4, REG-R5, REG-R6, REG-R7, and REG-R9)	The submitter supports Renewable electricity generation rules in part but considers that the matter of visual and landscape effects should be removed. 'Effects' change along with cultural norms and expectations, once we become accustomed to the presence of renewable generation infrastructure, start integrating new technology and seeing value in its benefits. For example, powerlines, pylons and telco towers are now accepted and represent progress. Renewable energy infrastructure supports the environment as well as district and regional development while strengthening energy resilience and visual impact should not be grounds on which a proposal can be rejected.	Reject	Section 7.2.1 Topic 5: REG Rules
FS82.40	Northpower Limited	REG Rules	Support	Accept the relief sought.	Supports the removal of matters of discretion relating to 'visual and landscape effects' from all relevant REG rules.	Reject	Section 7.2.1 Topic 5: REG Rules
149.20	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG Rules	Oppose	AMEND Renewable electricity generation rules so that activities are not enabled in overlays and sensitive environments. AND	The submitter opposes Renewable electricity generation rules as notified owing to some activities applying in all zones and, in some cases, this is considered inappropriate. Notably, renewable electricity generation	Reject	Section 7.2.1 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				Any consequential amendments and alternative relief to address the concerns raised.	activities are not appropriate within Outstanding Natural Features and Landscapes, the Coastal Environment, or areas supporting indigenous biodiversity. These areas are to be protected from inappropriate subdivision, use and development.		
FS45.37	Director General of Conservation	REG Rules	Support in part	Allow the original submission in part.	Supports avoiding adverse effects of REG activities in sensitive environments but considers the definition of ‘sensitive environments’ needs to be clearly defined for REG activities to be located appropriately. Notes it would be difficult to avoid adverse in areas featuring significant indigenous vegetation or significant habitats of fauna if such areas are neither identified nor mapped.	Accept in part	Section 7.2.1 Topic 5: REG Rules
FS77.26	Mercury NZ Limited	REG Rules	Oppose	Reject the relief sought.	This submission seeks to prevent renewable generation rules from applying in overlays and sensitive environments. To do so is inconsistent with the NPS-REG and will result in frequent resource consents being required for existing activities. The principle of targeted standards is supported, but renewable electricity rules continue should apply district-wide and effects managed through relevant overlay provisions as opposed to blanket exclusions.	Accept	Section 7.2.1 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
FS82.39	Northpower Limited	REG Rules	Oppose	Reject the relief sought.	<p>Renewable electricity generation activities should not be limited to the General Rural Zone or outside of any overlay.</p> <p>Renewable energy activities must be located where the resource is best available. As such, to imply that such activities are only appropriate in the General Rural Zone or outside of any overlay is nonsensical and inconsistent with higher order national and regional direction.</p>	Accept	Section 7.2.1 Topic 5: REG Rules
149.22	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG Rules	Amend	<p>ADD a new restricted discretionary or discretionary activity rule to the Renewable electricity generation chapter for operation, maintenance, or repair activities that do not meet permitted standards.</p> <p>AND</p> <p>ADD matters of discretion to the new rule (if restricted discretionary) relating to the nature and scale of the works, effects on the environment and surrounding land uses, as well as any measures to avoid, remedy or mitigate effects.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>A new rule is sought as part of the relief requested regarding REG-R2. A new rule would manage those activities not lawfully established or permitted. There are no further reasons provided for the addition of this new rule. As such, the submitter's opposition to REG-R2 is reproduced below:</p> <p>The submitter opposes REG-R2 as proposed and considers that the Rule should only apply to permitted or lawfully established renewable electricity generation activities. This is because consented activity conditions can prevail over REG-R2. The submitter is also concerned that REG-R2 permits the operation, maintenance and repair of existing renewable electricity generation infrastructure in all zones without any associated standards or conditions and considers the absence of</p>	Reject	Section 7.2.3 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					standards poses risk. Activities associated with renewable electricity generation can result in adverse effects, notably within sensitive environments (e.g., areas featuring identified ecological, cultural or landscape values). Standards are required as a mechanism to manage or limit potential adverse effects, including but not limited to, noise, traffic, vegetation disturbance, ecological and cultural effects.		
FS45.39	Director General of Conservation	REG Rules	Support	Allow the original submission.	Supports a new rule for the operation, maintenance, or repair of activities that do not meet REG-R2 permitted activity standards. As notified, there is no activity standard for when compliance is not achieved.	Reject	Section 7.2.3 Topic 5: REG Rules
FS82.38	Northpower Limited	REG Rules	Oppose	Reject the relief sought.	The operation, maintenance and repair of existing renewable electricity generation activities should not be subject to arbitrary permitted activity conditions and then require either a restricted discretionary or discretionary activity resource consent for non-compliance. The submitter considers that such activities need to be actively encouraged and enabled rather than become subject to additional conditions.	Accept	Section 7.2.3 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
149.23	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-R1	Amend	<p>AMEND REG-R1 to include standards relating to the management of effects on indigenous fauna, such as:</p> <ul style="list-style-type: none"> • Reflectiveness and angle of materials to manager glare and glint; and • Height, blade length, colour and lighting to avoid attracting wildlife. <p>AND</p> <p>ADD 'effects on indigenous biological diversity' to REG-R1 as a matter of discretion.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	The submitter opposes REG-R1 in part as turbines can result in adverse effects on wildlife. Amendments to REG-R1 are requested to manage such effects, such as including consideration of effects on indigenous species within the matters of discretion.	Accept in part	Section 7.2.2 Topic 5: REG Rules
FS77.23	Mercury NZ Limited	REG-R1	Oppose	Reject the relief sought.	The management of wildlife effects is complex and site-specific. The submitter considers such effects are best addressed through ecological assessments undertaken as part of a resource consents process, instead of by permitted activity standards. Such standards may be inappropriate or unworkable for specific technologies.	Accept in part	Section 7.2.2 Topic 5: REG Rules
FS82.27	Northpower Limited	REG-R1	Oppose	Reject the relief sought.	Opposes additional standards as the activity is temporary and wind masts do not typically contain turbine blades.	Accept in part	Section 7.2.2 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
283.58	Northpower Limited and Northpower Fibre Limited	REG-R1	Amend	AMEND REG-R1 to apply to all zones. AND Any further necessary consequential amendments required.	The submitter supports this inclusion of this rule but seeks that it is applied to all zones. Renewable electricity generation activities are located based on the availability and feasibility of the resource and should not be constrained by zones. Overlays will still apply and can address any sensitivities where relevant.	Reject	Section 7.2.2 Topic 5: REG Rules
304.44	Director General of Conservation	REG-R1	Amend	ADD the following matters of discretion to REG-R1.3.: <u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u> <u>x. Any adverse effects on sensitive values in Overlay areas.</u> AND Any alternative or consequential relief.	REG-R1 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved. However, there is no clear matter of discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values. The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.	Accept in part	Section 7.2.1 Topic 5: REG Rules
FS93.154	Royal Forest and Bird Protection Society of NZ	REG-R1	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 7.2.1 Topic 5: REG Rules
326.14	Mercury NZ Limited	REG-R1	Amend	AMEND REG-R1 as follows: Temporary wind anemometer (Wind monitoring mast(s)) 1. Activity status: Permitted	The submitter notes that wind monitoring masts are typically installed during the site investigation phase of wind farm development and	Accept in part	Section 7.2.2 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation



Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>Where:</p> <p>a. The height of the anemometer mast structure does not exceed:</p> <p>i. 80m 100m in the General rural or zone; or</p> <p>ii. 20m in the Light industrial zone, Heavy industrial zone, Māori purpose zone.</p> <p>b. No more than A maximum of three anemometer wind masts are installed within a site;</p> <p>c. The anemometer wind mast is removed and site is remediated within 5 years of its installation; and</p> <p>d. The anemometer wind mast is setback at least a distance equal to the height of the anemometer mast structure from the boundary or of any other site in different ownership.</p> <p>2. Activity status when compliance not achieved: Restricted Discretionary Controlled activity</p> <p>3. Matters over which discretion is restricted of control:</p> <p>a. Adverse effects resulting from the Location, design, height and scale number of the mast(s);</p> <p>b. The siting, colour and number of structure(s);</p> <p>c. Duration of the investigation activity and the plans for its removal and remediation;</p> <p>d. Operational need or functional need to be in the location;</p> <p>e. Visual and landscape effects; and</p>	<p>anemometers are attached to mast structures and used to measure wind speeds. In light of this, REG-R1 would benefit from amending terminology used.</p> <ul style="list-style-type: none"> • The submission outlines that, in rural environments, wind monitoring mast(s) are typically: <ul style="list-style-type: none"> ○ Up to 100m in height ○ Placed close to future wind turbine locations so that data collected accurately represents wind conditions within a development site. ○ Sited in locations free of obstacles that could affect wind flow. ○ Sited to avoid extreme high or low points. ○ Slim structures that blend in with rural landscapes. • 80m height for rural zones is unduly restrictive and enabling up to 100m with simplified matters of control is considered to be more consistent with enabling investigation policies. 		

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				f. Any proposed measures to mitigate adverse effects.			
FS93.247	Royal Forest and Bird Protection Society of NZ	REG-R1	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept in part	Section 7.2.2 Topic 5: REG Rules
326.15	Mercury NZ Limited	REG-R2	Support	RETAIN REG-R2 as notified.	Supports the permitted activity status for maintaining existing assets as existing assets play an important role in securing and maintaining renewable electricity generation.	Accept	Section 7.2.3 Topic 5: REG Rules
FS93.248	Royal Forest and Bird Protection Society of NZ	REG-R2	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 7.2.3 Topic 5: REG Rules
149.21	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-R2	Oppose	AMEND REG-R2 so it only applies to permitted and lawfully established renewable electricity generation activities. AND ADD performance standards to REG-R2 that seek to: <ul style="list-style-type: none"> • Limit the intensity, nature and scale of effects resulting from operation, maintenance and repair activities. • Avoid or manage disturbance to sensitive environments or features. • Require appropriate site reinstatement where land is disturbed. AND	The submitter opposes REG-R2 as proposed and considers that the rule should only apply to permitted or lawfully established renewable electricity generation activities. This is because consented activity conditions can prevail over REG-R2. The submitter is also concerned that REG-R2 permits the operation, maintenance and repair of existing renewable electricity generation infrastructure in all zones without any associated standards or conditions and considers the absence of standards poses risk. Activities associated with renewable electricity generation can result in adverse	Reject	Section 7.2.3 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				Any consequential amendments and alternative relief to address the concerns raised.	effects, notably within sensitive environments (e.g., areas featuring identified ecological, cultural or landscape values). Standards are required as a mechanism to manage or limit potential adverse effects, including but not limited to, noise, traffic, vegetation disturbance, ecological and cultural effects.		
FS45.38	Director General of Conservation	REG-R2	Support	Allow the original submission.	Supports the changes sought. In particular, the use of a standard to manage or limit adverse effects. The rule should only apply to permitted and lawfully established activities.	Reject	Section 7.2.3 Topic 5: REG Rules
FS77.27	Mercury NZ Limited	REG-R2	Oppose	Reject the relief sought.	This submission seeks to prevent renewable generation rules from applying in overlays and sensitive environments. To do so is inconsistent with the NPS-REG and will result in frequent resource consents being required for existing activities. The principle of targeted standards is supported, but renewable electricity rules continue should apply district-wide and effects managed through relevant overlay provisions as opposed to blanket exclusions.	Accept	Section 7.2.3 Topic 5: REG Rules
FS82.28	Northpower Limited	REG-R2	Oppose	Reject the relief sought.	The rule already applies to existing activities and should not be restricted	Accept	Section 7.2.3

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>further to permitted and lawfully established activities.</p> <p>The submitter considers further restriction would only create confusion and that the operation, maintenance and repair of ‘existing’ activities should not be subject any arbitrary conditions.</p>		Topic 5: REG Rules
283.59	Northpower Limited and Northpower Fibre Limited	REG-R2	Support	RETAIN REG-R2 as notified.	The submitter supports this rule.	Accept	Section 7.2.1 Topic 5: REG Rules
309.30	Clarus	REG-R2	Amend	<p>AMEND the title of REG-R2 to "Operation, maintenance and repair of existing renewable electricity generation activities <u>and other renewable energy production and supply</u>".</p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
FS41.58	Channel Terminal Services Ltd	REG-R2	Support	Accept the relief sought by the submitter.	<p>The submitter supports the amendments sought to REG rules where the amendment improves consistency, clarity and functionality of provisions.</p> <p>The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.</p>	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
304.45	Director General of Conservation	REG-R3	Amend	<p>ADD the following matters of discretion to REG-R3.3.:</p> <p><u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u></p> <p><u>x. Any adverse effects on sensitive values in Overlay areas.</u></p> <p>AND</p> <p>Any alternative or consequential relief.</p>	<p>REG-R3 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved. However, there is no clear matter of discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values.</p> <p>The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.</p>	Accept in part	Section 7.2.1 Topic 5: REG Rules
FS93.155	Royal Forest and Bird Protection Society of NZ	REG-R3	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 7.2.1 Topic 5: REG Rules
283.60	Northpower Limited and Northpower Fibre Limited	REG-R3	Support	RETAIN REG-R3 as notified.	The submitter supports this rule.	Accept	Section 7.2.2 Topic 5: REG Rules
149.24	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-R3	Amend	<p>AMEND REG-R3 to include standards relating to the management of effects on indigenous fauna, such as:</p> <ul style="list-style-type: none"> • Reflectiveness and angle of materials to manage glare and glint; and • Height, blade length, colour and lighting to avoid attracting wildlife. <p>AND</p>	The submitter opposes REG-R3 in part as turbines can result in adverse effects on wildlife. Amendments to REG-R3 are requested to manage such effects, such as including consideration of effects on indigenous species within the matters of discretion.	Reject	Section 7.2.2 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>ADD 'effects on indigenous biological diversity' to REG-R3 as a matter of discretion.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>			
FS77.24	Mercury NZ Limited	REG-R3	Oppose	Reject the relief sought.	<p>The management of wildlife effects is complex and site-specific. The submitter considers such effects are best addressed through ecological assessments undertaken as part of a resource consents process, instead of by permitted activity standards. Such standards may be inappropriate or unworkable for specific technologies.</p>	Accept	Section 7.2.2 Topic 5: REG Rules
FS82.29	Northpower Limited	REG-R3	Oppose	Reject the relief sought.	<p>Additional permitted activity standards are not required to appropriately manage effects. Additional provisions will not encourage nor enable such activities.</p>	Accept	Section 7.2.2 Topic 5: REG Rules
283.61	Northpower Limited and Northpower Fibre Limited	REG-R4	Support	RETAIN REG-R4 as notified.	The submitter supports this rule.	Accept	Section 7.2.2 Topic 5: REG Rules
149.25	Royal Forest and Bird Protection Society of New	REG-R4	Amend	AMEND REG-R4 to include standards relating to the management of effects on indigenous fauna, such as:	<p>The submitter opposes REG-R4 in part as solar panel glint and glare can result in adverse effects on wildlife. Amendments to REG-R3 are requested to manage such effects, such as requiring the use of non-</p>	Reject	Section 7.2.2 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
	Zealand Incorporated			<ul style="list-style-type: none"> • Reflectiveness and angle of materials to manage glare and glint; and • Height, blade length, colour and lighting to avoid attracting wildlife. <p>AND</p> <p>ADD 'effects on indigenous biological diversity' to REG-R4 as a matter of discretion.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	reflective materials for solar generation and including consideration of effects on indigenous species within the matters of discretion.		
FS77.25	Mercury NZ Limited	REG-R4	Oppose	Reject the relief sought.	The management of wildlife effects is complex and site-specific. The submitter considers such effects are best addressed through ecological assessments undertaken as part of a resource consents process, instead of by permitted activity standards. Such standards may be inappropriate or unworkable for specific technologies.	Accept	Section 7.2.2 Topic 5: REG Rules
FS82.30	Northpower Limited	REG-R4	Oppose	Reject the relief sought.	The notified activity standards are sufficient. Such activities need to be encouraged and enabled.	Accept	Section 7.2.2 Topic 5: REG Rules
304.46	Director General of Conservation	REG-R4	Amend	ADD the following matters of discretion to REG-R4.3.: <u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u>	REG-R4 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved. However, there is no clear matter of	Accept in part	Section 7.2.1 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p><u>x. Any adverse effects on sensitive values in Overlay areas.</u></p> <p>AND</p> <p>Any alternative or consequential relief.</p>	<p>discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values.</p> <p>The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.</p>		
FS93.156	Royal Forest and Bird Protection Society of NZ	REG-R4	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 7.2.1 Topic 5: REG Rules
283.62	Northpower Limited and Northpower Fibre Limited	REG-R5	Amend	<p>AMEND REG-R5 to apply to all zones consistently.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<p>The submitter supports this rule but seeks it to be applied across all zones.</p> <p>Renewable electricity generation Activities are located based on availability and feasibility of a resource and should not be constrained by zones.</p> <p>Overlays will still apply and can address any relevant sensitivities.</p>	Reject	Section 7.2.1 Topic 5: REG Rules
304.47	Director General of Conservation	REG-R5	Amend	<p>ADD the following matters of discretion to REG-R5.3.:</p> <p><u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u></p> <p><u>x. Any adverse effects on sensitive values in Overlay areas.</u></p> <p>AND</p> <p>Any alternative or consequential relief.</p>	<p>REG-R5 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved.</p> <p>However, there is no clear matter of discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values.</p>	Accept in part	Section 7.2.1 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.		
FS93.157	Royal Forest and Bird Protection Society of NZ	REG-R5	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 7.2.1 Topic 5: REG Rules
332.8	Northland Regional Council	REG-R5	Amend	<p>ADD a new permitted activity condition to REG-R5.1. requiring a 200m setback from all 'Significant Bird Area – Critical Bird Habitats', as mapped in the Northland Proposed Regional Plan.</p> <p>AND</p> <p>ADD a new matter of discretion to REG-R5.3. regarding setback distances from key habitats of at-risk or threatened species.</p>	<p>The submitter notes that wind turbines can present risk to avifauna and bats, including threatened and at-risk species and considers the appropriate siting of turbines and setbacks from key habitats should be a used as risk mitigation. As such, a permitted activity condition and additional matter of discretion is requested to manage the risk of freestanding small-scale turbines on indigenous biodiversity.</p> <p>Northland Regional Council have mapped the habitats of White Heron, Australasian Bittern and New Zealand Fairy Tern (refer Proposed Regional Plan for Northland). All of these species are classified as 'Nationally Critical', i.e., the most severe threat category in New Zealand's conservation status rankings, indicating a species is facing an immediate high risk of extinction. They also inhabit the Coastal Marine Area and land within Kaipara and are potentially at risk from wind turbines.</p>	Accept in part	Section 7.2.4 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
FS45.118	Director General of Conservation	REG-R5	Support	Allow the original submission.	Supports a setback being included as it recognises and provides for RMA s6(c).	Accept in part	Section 7.2.4 Topic 5: REG Rules
283.63	Northpower Limited and Northpower Fibre Limited	REG-R6	Amend	AMEND REG-R6 to apply to all zones consistently. AND Any further necessary consequential amendments required.	The submitter supports this rule but seeks it to be applied across all zones. Renewable electricity generation activities are located based on availability and feasibility of a resource and should not be constrained by zones. Overlays will still apply and can address any relevant sensitivities.	Reject	Section 7.2.1 Topic 5: REG Rules
294.9	Birt & Currie Surveyors Limited	REG-R6	Amend	AMEND REG-R6 to: <ul style="list-style-type: none"> • apply a height standard which matches the maximum building and structure height for the zone, and • control coverage by way of the impermeable surface coverage rule, rather than specifying 200m², and apply a setback which matches the setback rules of the zone.	Rule is overly restrictive, without any perceptible benefit to the restriction.	Reject	Section 7.2.4 Topic 5: REG Rules
304.48	Director General of Conservation	REG-R6	Amend	ADD the following matters of discretion to REG-R6.3.: <u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u> <u>x. Any adverse effects on sensitive values in Overlay areas.</u> AND Any alternative or consequential relief.	REG-R6 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved. However, there is no clear matter of discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values.	Accept in part	Section 7.2.1 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.		
FS93.158	Royal Forest and Bird Protection Society of NZ	REG-R6	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 7.2.1 Topic 5: REG Rules
304.49	Director General of Conservation	REG-R7	Amend	ADD the following matters of discretion to REG-R7.4.: <u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u> <u>x. Any adverse effects on sensitive values in Overlay areas.</u> AND Any alternative or consequential relief.	REG-R7 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved. However, there is no clear matter of discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values. The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.	Accept in part	Section 7.2.1 Topic 5: REG Rules
FS93.159	Royal Forest and Bird Protection Society of NZ	REG-R7	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 7.2.1 Topic 5: REG Rules
283.64	Northpower Limited and Northpower Fibre Limited	REG-R7	Amend	AMEND the activity status for REG-R7 from Controlled to Permitted. AND DELETE the Matters of Control in REG-R7.2.a. to REG-R7.2.e. AND	The framework should be more enabling for community scale renewable electricity generation activities as this will better meet the intention of the National Policy Statement for Renewable electricity generation.	Reject	Section 7.2.5 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>AMEND this rule to apply to all zones consistently.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<p>To be aligned with the approach taken with Renewable electricity generation chapter of the Proposed Far North District Plan.</p> <p>The rule should be applied to all zones.</p> <p>Renewable electricity generation Activities are located based on availability and feasibility of a resource and should not be constrained by zones.</p> <p>Overlays will still apply and can address any relevant sensitivities.</p>		
308.14	Fire and Emergency New Zealand	REG-R7	Amend	<p>AMEND REG-R7, as follows:</p> <p>...</p> <p>2. Matters over which control is reserved:</p> <p>...</p> <p>f. <u>Proposed measures to mitigate fire risk.</u></p> <p>4. Matters over which discretion is restricted:</p> <p>...</p> <p>i. <u>Proposed measures to mitigate fire risk.</u></p>	<p>Amendment sought to require consideration of fire risk.</p>	Reject	Section 7.2.5 Topic 5: REG Rules
FS82.31	Northpower Limited	REG-R7	Oppose	<p>Reject the relief sought.</p>	<p>Proposed measures to mitigate fire risk should not be a matter of control or discretion for community-scale renewable electricity generation activities.</p> <p>Fire risk management is addressed through comprehensive national standards and industry regulations.</p>	Accept	Section 7.2.5 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>To introduce additional matters of control/discretion would create unnecessary duplication, potential conflicts and uncertainty, as well as time and costs associated.</p> <p>Renewable electricity generation has a low fire risk when designed and maintained to existing codes, to have control/discretion is disproportionate and impractical.</p>		
332.9	Northland Regional Council	REG-R7	Amend	<p>ADD a new matter of control and discretion to REG-R7.2. and REG-R7.4. respectively to provide for the consideration and management of adverse effects on indigenous biodiversity as follows (or words to similar effect):</p> <p><u>Effects on ecosystem health and indigenous biodiversity.</u></p>	<p>Supports the intention of REG-R7 but considers the assessment of adverse effects on indigenous biodiversity, particularly for threatened or at-risk species, under controlled and restricted discretionary rules is essential. The submitter notes that wind turbines can have adverse effects on native bird and bat species.</p> <p>The Northland Regional Policy Statement (NRPS) requires district plans to implement measures to manage risks associated with land use and development on biodiversity. In particular, NRPS Policy 4.4.1 mandates that district plans ensure land use and development do not result in more than minor adverse effects on indigenous taxa listed as threatened or at risk under the New Zealand Threat Classification System.</p>	Accept	Section 7.2.5 Topic 5: REG Rules
283.65	Northpower Limited and	REG-R8	Amend	<p>AMEND the title and content of REG-R8 as follows:</p>	<p>Adverse effects associated with large scale renewable electricity generation are readily understandable.</p>	Accept in part	Section 7.2.6

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
	Northpower Fibre Limited			<p>Large scale renewable energy electricity generation activities</p> <p>1. Activity status: Discretionary <u>Restricted</u></p> <p><u>Discretionary</u></p> <p>Where:</p> <p>a. Compliance is achieved with NZS 6808:2010 Acoustics – Wind Farm noise for any proposal involving wind generation.</p> <p><u>2. Matters over which discretion is restricted:</u></p> <p>a. <u>The location, scale and intensity of the activity;</u></p> <p>b. <u>Shadow flicker and glare;</u></p> <p>c. <u>Visual and landscape effects;</u></p> <p>d. <u>Noise and vibration effects;</u></p> <p>e. <u>Functional need or operational need to be in the location;</u></p> <p>f. <u>The significant national or regional benefits associated with the activity;</u></p> <p>g. <u>Proposed measures to mitigate adverse effects, including siting, design, colour, finish, or landscaping; and</u></p> <p>h. <u>Proposed rehabilitation of the site at the end of the operational life of the activity.</u></p> <p>3. Activity status when compliance not achieved: Non-complying <u>Discretionary</u></p>	<p>Non-compliance should result in a Discretionary activity status although no reason for this is provided.</p> <p>The rule title should be amended to remain consistent with the other provisions in the Renewable electricity generation chapter.</p>		Topic 5: REG Rules
304.51	Director General of Conservation	REG-R8	Amend	<p>ADD the following clause to REG-R8.1. as follows:</p> <p>a. Compliance is achieved with NZS 6808:2010 Acoustics - Wind farm noise for any proposal involving wind generation;</p>	<p>As drafted, REG-R8 does not restrict where large scale renewable generation activities can occur. The submitter notes that such activities require large areas of land and, therefore, should be limited to the</p>	Reject	Section 7.2.6 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>b. <u>Any large scale renewable energy generation activities are:</u></p> <p>i. <u>Located within the General rural zone;</u></p> <p>ii. <u>Located outside any Overlay.</u></p> <p><u>AND</u></p> <p>Any consequential or alternative relief.</p>	General rural zone and not subject to any overlay.		
FS93.161	Royal Forest and Bird Protection Society of NZ	REG-R8	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 7.2.6 Topic 5: REG Rules
FS77.16	Mercury NZ Limited	REG-R8	Oppose	Reject the relief sought.	<p>The submitter opposes any changes to REG-R8 capable of narrowing the range of locations where large-scale renewable electricity generation activities are provided a consent pathway. In particular, any changes resulting in a default non-complying activity status for such activities within overlays or specific zones.</p> <p>Effects on overlays and natural environment values should be managed through REG-P4–P6 and relevant Part 2 provisions, rather than through the application of blanket spatial exclusions.</p>	Accept	Section 7.2.6 Topic 5: REG Rules
FS82.33	Northpower Limited	REG-R8	Oppose	Reject the relief sought.	<p>Large scale renewable electricity generation activities should not be limited to the General Rural Zone or outside of any overlay.</p> <p>Renewable energy activities must be located where the resource is best</p>	Accept	Section 7.2.6 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation



Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					available. As such, to imply that such activities are only appropriate in the General Rural Zone or outside of any overlay is nonsensical and inconsistent with higher order national and regional direction.		
308.15	Fire and Emergency New Zealand	REG-R8	Amend	<p>AMEND REG-R8, as follows:</p> <p>...</p> <p>1. Activity status: Discretionary <u>The following assessment criteria are provided to assist and guide the consideration of discretionary activity resource consent applications. However, the Council’s discretion is not limited to these matters.</u></p> <p style="padding-left: 40px;">a. <u>The extent to which the activity is able to avoid or mitigate fire risk and the actual and potential effects on assets, property and the environment.</u></p> <p>OR</p> <p>amendments to similar effect.</p>	Amendment sought to require consideration of fire risk for large scale renewable energy generation activities, such as wind turbines, solar farms and associated Battery Energy Storage Systems. The risk profiles, fire protection and mitigation and associated responses are distinct for each type of facility and should be determined on a case-by-case basis. This will allow for a more strategic approach to fire risk management and response at these sites and will enable Council, through the resource consent process to assess and regulate fire risk associated with renewable energy generation activities. This aligns with Councils functions under Section 31 of the RMA.	Reject	Section 7.2.6 Topic 5: REG Rules
FS82.32	Northpower Limited	REG-R8	Oppose	Reject the relief sought.	<p>Proposed measures to mitigate fire risk should not be a matter of control or discretion for large-scale renewable electricity generation activities.</p> <p>Fire risk management is addressed through comprehensive national standards and industry regulations.</p>	Accept	Section 7.2.6 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>To introduce additional matters of control/discretion would create unnecessary duplication, potential conflicts and uncertainty, as well as time and costs associated.</p> <p>Renewable electricity generation has a low fire risk when designed and maintained to existing codes, to have control/discretion is disproportionate and impractical.</p>		
326.16	Mercury NZ Limited	REG-R8	Amend	<p>AMEND REG-R8 as follows:</p> <p>Large scale Renewable energy generation activities</p> <p>1. Activity status: <u>Restricted</u> Discretionary</p> <p>Where:</p> <p>a. Compliance is achieved with NZS 6808:2010 Acoustics - Wind farm noise for any proposal involving wind generation.</p> <p>2. Activity status when compliance not achieved: Discretionary Non-Complying <u>Matters of discretion</u></p> <p>Request specific matters of discretion for solar, wind and other renewable electricity generation.</p>	<p>Increasing renewable electricity generation has nationally significant benefits attributable to renewable electricity generation at any scale. The submitter requests the activity status is amended to restricted discretionary with specific matters of discretion tailored to solar, wind and other renewable electricity generation. This is to reflect more enabling policy direction.</p> <p>The adverse effects associated with renewable electricity generation are generally understood and there are effective mitigation measures available to manage such effects. The submitter notes that, for wind, it considers a discretionary status would be more appropriate where compliance with NZS 6808:2010 Acoustics - Wind farm noise is not achieved.</p>	Accept in part	Section 7.2.6 Topic 5: REG Rules
FS93.249	Royal Forest and Bird	REG-R8	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could	Accept in part	Section 7.2.6

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
	Protection Society of NZ				result in loss of indigenous biodiversity.		Topic 5: REG Rules
326.17	Mercury NZ Limited	REG-R9	Amend	<p>RETAIN the Permitted activity status for REG-R9.</p> <p>AND</p> <p>AMEND REG-R9 to split the rule into two parts, comprising:</p> <p>a. Upgrading or repowering existing renewable electricity generation activities.</p> <p><u>b. Repowering - wind and solar.</u></p> <p>AND</p> <p>DELETE REG-R9.1.a. and b.</p> <p>OR</p> <p>AMEND the parameters in REG-R9 to enable A. upgrading and B. repowering</p> <p>AND</p> <p>AMEND REG-R9 so that wind farms that do not comply with NZS 6808:2010 Acoustics - Wind farm noise, retain restricted discretionary activity status but amend matters over which discretion is restricted to be specific to noise effects and mitigation.</p> <p>AND</p> <p>AMEND REG-R9 so that non-compliance with all other parameters (other than wind farms that do not comply with NZS 6808:2010 Acoustics - Wind farm noise) is a controlled activity with appropriate matters of control.</p> <p>OR</p>	<p>Upgrading in relation to existing renewable electricity generation assets means increasing their capacity, resilience, efficiency, security, reliability, flexibility, longevity or safety.</p> <p>Repowering is specific to solar and wind renewable electricity generation assets and may be whole or partial replacement or upgrading to maintain or increase generation output and extend the operational life of the asset.</p> <p>The proposed parameters are arbitrary and inconsistent with the enabling objectives and policies.</p>	Reject	Section 7.2.7 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				ADD a renewable electricity generation overlay on the planning maps with a corresponding activity status for upgrading and repowering.			
FS93.250	Royal Forest and Bird Protection Society of NZ	REG-R9	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept	Section 7.2.7 Topic 5: REG Rules
283.66	Northpower Limited and Northpower Fibre Limited	REG-R9	Amend	DELETE the height limit in REG-R9.1.b.i. AND Any further necessary consequential amendments required.	Limiting the height increase is inappropriate as the rule applies to all types of renewable electricity which significantly vary in height. Limiting the height by any defined metric will impose an inconsistent standard across the types of renewable energy.	Reject	Section 7.2.7 Topic 5: REG Rules
304.50	Director General of Conservation	REG-R9	Amend	ADD the following clause to REG-R9.1.a. as follows: a. The upgrade or repowering is located: i. <u>Within the same site as the existing renewable electricity activity;</u> ii. <u>Within the General rural zone;</u> iii. <u>Outside any Overlay.</u> b. ... AND ADD the following matters of discretion to REG-R9.3.: <u>x. Any adverse effects on ecosystems and indigenous biodiversity.</u>	As drafted, REG-R9 does not restrict where large scale renewable generation activities can occur. The submitter notes that such activities require large areas of land and, therefore, should be limited to the General rural zone and not subject to any overlay. Moreover, REG-R9 defaults to a restricted discretionary status when compliance with permitted activity standards cannot be achieved. However, there is no clear matter of discretion for Council to assess adverse effects on ecology/indigenous biodiversity or sensitive values. The submitter	Reject	Section 7.2.7 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p>x. Any adverse effects on sensitive values in Overlay areas.</p> <p>AND</p> <p>Any alternative or consequential relief.</p>	requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.		
FS93.160	Royal Forest and Bird Protection Society of NZ	REG-R9	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 7.2.7 Topic 5: REG Rules
FS82.34	Northpower Limited	REG-R9	Oppose	Reject the relief sought.	<p>The permitted upgrade or repowering of existing renewable electricity generation activities should not be restricted to those activities within the General rural zone or outside of any overlay.</p> <p>The use of existing activities should be encouraged and enabled in all zones and overlays.</p>	Accept	Section 7.2.7 Topic 5: REG Rules
308.16	Fire and Emergency New Zealand	REG-R9	Amend	<p>AMEND REG-R9, as follows:</p> <p>3. Matters over which discretion is restricted:</p> <p>...</p> <p><u>d. Proposed measures to mitigate fire risk.</u></p>	Amendment sought to require consideration of fire risk for large scale renewable energy generation activities, such as wind turbines, solar farms and associated Battery Energy Storage Systems (BESS). The risk profiles, fire protection and mitigation and associated responses are distinct for each type of facility and should be determined on a case-by-case basis. This will allow for a more strategic approach to fire risk management and response at these sites and will enable Council, through the resource consent process to assess and regulate fire risk	Reject	Section 7.2.7 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>associated with renewable energy generation activities. This aligns with Councils functions under Section 31 of the RMA.</p> <p>REG-R9 to be amended to require consideration of fire risk for the upgrading or repowering of existing renewable electricity generation activities where resource consent is required.</p>		
FS82.35	Northpower Limited	REG-R9	Oppose	Reject the relief sought.	<p>Proposed measures to mitigate fire risk should not be a matter of control or discretion for upgrading or repowering existing renewable electricity activities.</p> <p>Fire risk management is addressed through comprehensive national standards and industry regulations. To introduce additional matters of control/discretion would create unnecessary duplication, potential conflicts and uncertainty, as well as time and costs associated.</p> <p>Renewable electricity generation has a low fire risk when designed and maintained to existing codes, to have control/discretion is disproportionate and impractical.</p>	Accept	Section 7.2.7 Topic 5: REG Rules
326.18	Mercury NZ Limited	REG-R10	Amend	AMEND REG-R10 to include reference to controlled activities as a consequence of the requested changes to REG-R1 (as outlined in another submission point).	Consequence of changes requested to REG-R1.	Reject	Section 7.2.8 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
FS93.251	Royal Forest and Bird Protection Society of NZ	REG-R10	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Accept	Section 7.2.8 Topic 5: REG Rules
283.67	Northpower Limited and Northpower Fibre Limited	REG-R10	Support	RETAIN REG-R10 as notified.	The submitter supports this rule as worded.	Accept in part	Section 7.2.1 Topic 5: REG Rules
304.52	Director General of Conservation	REG-R10	Amend	AMEND the activity status in REG-R10 as follows: 1. Activity status: Discretionary Non-Complying AND Any further or alternative relief to like effect to that sought.	The submitter opposes the discretionary activity status provided in REG-R10. No specific reasons are provided.	Reject	Section 7.2.8 Topic 5: REG Rules
FS93.162	Royal Forest and Bird Protection Society of NZ	REG-R10	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 7.2.8 Topic 5: REG Rules
FS82.37	Northpower Limited	REG-R10	Oppose	Reject the relief sought.	A non-complying activity status is too restrictive and does not give effect to the NPS-REG.	Accept	Section 7.2.8 Topic 5: REG Rules
309.31	Clarus	REG-R10	Amend	AMEND the title of REG-R10 to: Renewable electricity energy generation activities not otherwise provided for AND AMEND the text of REG-R10, as follows:	Does not include wider renewable energy sources.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				Any other renewable electricity generation activity <u>or other renewable energy production and supply.</u> AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.			
FS41.59	Channel Terminal Services Ltd	REG-R10	Support	Accept the relief sought by the submitter.	The submitter supports the amendments sought to REG rules where the amendment improves consistency, clarity and functionality of provisions. The submitter considers such amendments will provide an enabling framework for technological advancements and innovation.	Reject	Section 3.2.1 Topic 1: General submissions on the REG Chapter
308.17	Fire and Emergency New Zealand	REG-R10	Amend	AMEND REG-R10, as follows: ... 1. Activity status: Discretionary <u>The following assessment criteria are provided to assist and guide the consideration of discretionary activity resource consent applications. However, the Council’s discretion is not limited to these matters.</u> <u>a. The extent to which the activity is able to avoid or mitigate fire risk and the actual and potential effects on assets, property and the environment.</u> OR Amendment to similar effect.	Amendment sought to require consideration of fire risk for large scale renewable energy generation activities, such as wind turbines, solar farms and associated Battery Energy Storage Systems (BESS). The risk profiles, fire protection and mitigation and associated responses are distinct for each type of facility and should be determined on a case-by-case basis. This will allow for a more strategic approach to fire risk management and response at these sites and will enable Council, through the resource consent process to assess and regulate fire risk associated with renewable energy generation activities. This aligns with	Reject	Section 7.2.8 Topic 5: REG Rules

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
					<p>Councils functions under Section 31 of the RMA.</p> <ul style="list-style-type: none"> REG-R10 to be amended to required consideration of fire risk for other renewable electricity generation activity not provided for as a permitted, restricted discretionary, discretionary or non-complying activity. 		
FS82.36	Northpower Limited	REG-R10	Oppose	Reject the relief sought.	<p>Proposed measures to mitigate fire risk should not be assessment criteria for renewable electricity activities not otherwise provided for.</p> <p>Fire risk management is addressed through comprehensive national standards and industry regulations. To introduce additional matters of control/discretion would create unnecessary duplication, potential conflicts and uncertainty, as well as time and costs associated.</p> <p>Renewable electricity generation has a low fire risk when designed and maintained to existing codes, to have such criteria is disproportionate and impractical.</p>	Accept	Section 7.2.8 Topic 5: REG Rules
283.9	Northpower Limited and Northpower Fibre Limited	Definition – Community-scale renewable electricity generation activities	Support	RETAIN the definition for "Community-scale renewable electricity generation activities" as notified.	The submitter supports this definition.	Accept in part	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
283.14	Northpower Limited and Northpower Fibre Limited	Definition – Large-scale renewable electricity generation activities	Support	RETAIN the definition for "Large-scale renewable electricity generation activities" as notified.	The submitter supports this definition.	Accept in part	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
283.21	Northpower Limited and Northpower Fibre Limited	Definition – Renewable electricity generation activities	Amend	AMEND the definition of 'Renewable Electricity Generation Activities' as follows: "means the construction, operation and maintenance of <u>buildings or structures</u> associated with renewable electricity generation, <u>distribution and transmission</u> . This includes, <u>but is not limited to</u> , small and community-scale distributed renewable generation activities, and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity." AND Any further necessary consequential amendments required.	The definition should include buildings as well as structures. The definition should reference distribution and transmission to recognise and provide for conveyance mechanism for the renewable energy generation. The infrastructure for distribution, transmission and storage of renewable energy needs to be provided for. Including "but is not limited to" will avoid unintended narrowing of the definition.	Accept in part	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
283.22	Northpower Limited and Northpower Fibre Limited	Definition – Renewable energy	Support	RETAIN the definition for "Renewable energy" as notified.	The submitter supports this definition as worded as it is in alignment with Section 2 of the RMA.	Accept	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
283.23	Northpower Limited and	Definition – Repowering existing wind	Amend	AMEND the definition for "Repowering existing wind and solar electricity generation activities" as follows:	To ensure activities are not invertedly captured by the definition, and	Accept in part	Section 4.2.2 Topic 2: REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
	Northpower Fibre Limited	and solar electricity generation activities		“means replacing more than 50% of the structures at an existing renewable generation facility (source: new, to support rules).” AND Any further necessary consequential amendments required.	associated rule in the Renewable Energy Chapter (REG-R10).		Overview, notes and definitions
283.26	Northpower Limited and Northpower Fibre Limited	Definition – Small-scale renewable electricity generation	Support	RETAIN the definition of "Small-scale renewable electricity generation" as notified.	The submitter supports this definition	Accept in part	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
304.10	Director General of Conservation	Definition – Community-scale renewable electricity generation activities	Amend	AMEND the definition for 'Community Scale Renewable Electricity Generation Activities' as follows: means renewable electricity generation supplying electricity to a local community electricity users or the distribution network and where the installed capacity does not exceed X. AND Any alternative or consequential relief.	As drafted, the definition is not clear for plan users. The submitter considers the definition should have a quantitative threshold to ensure its application under provisions is clear. An appropriate KW or MW threshold can be determined on the advice of suitably qualified experts through the first schedule process.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS93.120	Royal Forest and Bird Protection Society of NZ	Definition – Community-scale renewable electricity generation activities	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS82.12	Northpower Limited	Definition – Community-	Oppose	Reject the original submission.	The submitter does not consider the definition requires a quantitative KW	Accept	Section 4.2.2

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
		scale renewable electricity generation activities			or MW threshold as thresholds are arbitrary and not associated with environmental effects of community scale activities.		Topic 2: REG Chapter Overview, notes and definitions
304.26	Director General of Conservation	Definition – Large-scale renewable electricity generation activities	Support	RETAIN the definition of 'Large-scale renewable electricity generation activities' as notified. AND Any further or alternative relief to like effect to that sought, including the relief sought regarding community scale renewable electricity generation activities.	The submitter supports this definition subject to the relief sought for community scale renewable electricity generation activities being granted.	Accept in part	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS93.136	Royal Forest and Bird Protection Society of NZ	Definition – Large-scale renewable electricity generation activities	Support	Allow the original submission.	The submission seeks to amend provisions to improve outcomes for indigenous biodiversity.	Accept in part	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
309.16	Clarus	Definition – Renewable electricity generation activities	Amend	RETAIN the definition of "Renewable electricity generation activities". AND ADD an additional definition of activities and use this in supportive objectives, policies and rules. A proposed definition is: <u>Renewable energy generation activities: Means the construction, operation and maintenance of structures associated with any form of renewable energy generation, including downstream products such as green hydrogen or ammonia.</u>	The definition of "Renewable electricity generation activities" is from the National Planning Standards and is supported but is limited to electricity. Submitter considers that the Proposed District Plan should also define and support other forms of renewable energy generation. For example, these may arise from landfill gas capture, biowaste digestion, wastewater treatment plant capture or importation among others. These forms of renewable energy should be supported to the same extent as	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	renewable electricity generation as required by Northland Regional Policy Statement Policy 5.4.1.		
FS41.50	Channel Terminal Services Ltd	Definition – Renewable electricity generation activities	Support in part	Accept the relief sought by the original submitter with further amendments as requested.	<p>The introduction of a definition for “Renewable energy generation activities” in supported principle. However, the definition should be broader to ensure it captures emerging energy types and fuels. The following definition is suggested:</p> <p><u>means the construction, operation, maintenance, repair, and upgrading of structures and infrastructure associated with the generation, processing, storage and distribution of energy from renewable and low-emissions sources, including associated downstream products such as green hydrogen, ammonia, biofuels, e-fuels and similar technologies.</u></p> <p>The submitter considers a broader definition will improve the PDP’s resilience to technological change and support the efficient development and operation of renewable energy infrastructure.</p>	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
309.17	Clarus	Definition – new	Amend	ADD a definition of "Green hydrogen", as follows: <u>Green Hydrogen refers to hydrogen produced through the electrolysis of water</u>	This builds on the definition of renewable energy and supports both the District's and national objectives	Reject	Section 4.2.2 Topic 2: REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				<p><u>using electricity generated from renewable sources.</u></p> <p>AND</p> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	and strategies for energy and climate resilience and emissions reduction.		Overview, notes and definitions
326.19	Mercury NZ Limited	Definition – Community-scale renewable electricity generation activities	Amend	<p>AMEND the definition for "Community Scale Renewable Electricity Generation Activities" as follows:</p> <p>means renewable electricity generation supplying electricity to a local community <u>has the same meaning as the National Policy Statement for Renewable Electricity generation 2011 or gazetted replacement.</u></p>	<p>The submitter requests that the National Policy Statement for Renewable Electricity Generation is adopted to provide clarity between renewable electricity generation activities and small community-scale distributed electricity generation. The National Policy Statement for Renewable Electricity Generation definition is as follows:</p> <p><i>means renewable electricity generation for the purpose of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network.</i></p>	Accept	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS45.115	Director General of Conservation	Definition – Community-scale renewable electricity generation activities	Oppose	Disallow the original submission in part.	The definition does not distinguish between small-scale and community-scale but the REG chapter has separate provisions for each activity.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS93.252	Royal Forest and Bird	Definition – Community-scale renewable	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could	Reject	Section 4.2.2 Topic 2: REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
	Protection Society of NZ	electricity generation activities			result in loss of indigenous biodiversity.		Overview, notes and definitions
326.21	Mercury NZ Limited	Definition – Large-scale renewable electricity generation activities	Amend	AMEND the definition for "Large-scale Renewable Electricity Generation Activities" as follows: LARGE-SCALE Renewable Electricity Generation Activities Means renewable electricity generation activities with greater generation output than community scale renewable electricity generation activities has the same meaning as the National Policy Statement for Renewable Electricity generation 2011 or gazetted replacement.	The submitter requests that the National Planning Standards definition is relied upon. It is suggested that a separate provision could be made for small and community-scale renewable electricity generation within the rule framework.	Accept	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS45.116	Director General of Conservation	Definition – Large-scale renewable electricity generation activities	Oppose	Disallow the original submission.	The amendments sought would make the difference between small-scale, community scale and large-scale activities unclear for plan users. Though the NPS-REG does not contain a definition for large-scale activities, this should be addressed in the PDP.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
FS93.254	Royal Forest and Bird Protection Society of NZ	Definition – Large-scale renewable electricity generation activities	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
326.23	Mercury NZ Limited	Definition – Renewable electricity	Support	RETAIN the definition for "Renewable Electricity Generation Activities".	The Government's proposal will likely revise terminology, for example, including reference to ‘investigation’,	Accept	Section 4.2.2 Topic 2: REG Chapter

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
		generation activities		OR REPLACE the definition of "Renewable Electricity Generation Activities" with the following: <u>has the same meaning as the National Policy Statement for Renewable Electricity Generation 2011 or gazetted replacement.</u>	‘ancillary activities’ and ‘storage’ (i.e., batteries). Though alternative relief is sought, cross-referencing to the National Policy Statement for Renewable Electricity Generation, the submitter's preference is for the definition text itself to be included within the Proposed District Plan.		Overview, notes and definitions
FS93.256	Royal Forest and Bird Protection Society of NZ	Definition – Renewable electricity generation activities	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions
326.24	Mercury NZ Limited	Definition – Repowering existing wind and solar electricity generation activities	Amend	AMEND the definition for "Repowering Existing Wind and Solar Electricity Generation Activities" as follows: REPOWERING EXISTING WIND AND SOLAR ELECTRICITY GENERATION ACTIVITIES means <u>replacing more than 50% of the structures at an existing renewable generation facility in relation to existing renewable electricity generation assets generating electricity from wind or solar, the whole or partial replacement to increase generation output and/or extend the operational life of the renewable electricity generation assets.</u> OR REPLACE the definition for "Repowering Existing Wind and Solar Electricity Generation Activities" with:	The submitter considers reference to 50% is arbitrary and does not support this. If a replacement threshold is considered necessary, it should be in a rule and not the definition. The submitter requests that the definition be amended to relate to the policy purpose of provisions, being to increase generation or extend the operational life of renewable electricity generation assets. The alternative relief cross-references the National Policy Statement for Renewable Electricity Generation definition; the preference is for the definition text itself to be adopted into the Proposed District Plan.	Accept	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions

Appendix A – Officer’s Recommendation Decisions on Submissions - Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons	Officer Recommendation	Relevant section of s42A Report
				has the same meaning as the National Policy Statement for Renewable Electricity generation 2011 or gazetted replacement.			
FS93.257	Royal Forest and Bird Protection Society of NZ	Definition – Repowering existing wind and solar electricity generation activities	Oppose	Disallow the original submission.	The amendments sought are either inappropriate or uncertain and could result in loss of indigenous biodiversity.	Reject	Section 4.2.2 Topic 2: REG Chapter Overview, notes and definitions