30 June 2025

To:	Kaipara District Council Via email: districtplanreview@kaipara.govt.nz
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Submission form statements:	Mercury wishes to be heard in support of this submission Mercury would consider presenting a joint case with other submitters, who make similar submission at a hearing Mercury could not gain an advantage in trade competition through this submission.
Privacy statement:	Mercury acknowledge that we have read and understood the Council's privacy statement.

SUBMISSION ON THE PROPOSED KAIPARA DISTRICT PLAN

1 Introduction

Mercury NZ Limited ("Mercury") welcomes the opportunity to submit on the proposed Kaipara District Plan ("**PKDP**"). Mercury is a renewable electricity generator and multi-product retailer. Within the Kaipara District Mercury is currently developing the Kaiwaikawe wind farm.

As detailed below, we support the approach to Renewable Electricity Generation ("**REG**") in the PKDP as outlined in the section 32 report. Renewable energy resources in the Kaipara District include solar and wind, with transmission infrastructure including a local distribution network and two Transpower national grid lines. A map showing the location of Kaiwaikawe wind farm, range of wind speeds within the district and the location of the Transpower lines is attached as **Appendix 1**.

2 About Mercury and Kaiwaikawe Wind Farm

Mercury generates its electricity from renewable energy sources – hydro, geothermal and wind. Mercury's portfolio includes the Waikato Hydro Scheme, five geothermal power stations in the Taupō volcanic zone and windfarms at Kaiwera Downs, Mahinerangi, Tararua, Turitea, and Waipipi.

In the Kaipara District the Kaiwaikawe wind farm, north-west of Dargaville is currently under construction. The 77MW (221GWh p.a.) wind farm, which is Northland's first, will generate enough renewable electricity to power about 27,000 homes - equivalent to powering the Far North. It will feature the tallest and largest turbines in the country, reaching 206 metres to the top of the rotor blade.

3 Government Resource Management Reform & National directions

The Governments 'Electrify NZ' initiative is a national strategy aimed at transitioning the economy to renewable energy. This includes accelerating REG and reforming the Resource Management Act ("**RMA**") to streamline consents for energy projects.

More broadly, the Government's reform of the resource management system, including replacement of the RMA with two new Acts, is driven by the need to:

- Enable economic growth and infrastructure development
- Make the system simpler, faster, and less costly
- Provide clearer environmental protections
- Improve climate change adaptation and resilience

The reform package to date has included:

- Introduction of the Fast-track Approvals Act 2024.
- Targeted amendments to the RMA – Amendment #1 (Freshwater and Other Matters) passed into law in 2024, and Amendment #2 (Consenting and Other System Changes) anticipated to be enacted mid-late 2025.
- Proposed changes to national direction instruments (amendments to and new national policy statements and environmental standards).

Mercury and the Electricity Sector Environment Group (of which Mercury is a member of) is participating in and submitting on those parts of the reform package that impact REG.

The resource management reform, especially the National Direction Package 1 and the proposal to amend the National Policy Statement for Renewable Electricity Generation 2011, signals a shift toward stronger policy and regulatory direction for increasing REG. This direction recognises the national importance and benefits of REG to support New Zealand's climate change and electrification goals.

4 Proposed Kaipara District Plan – Topic: Renewable Electricity Generation

Mercury supports the review of Kaipara District Plan and the approach to renewable electricity generation as outlined in the Section 32 report:

> *"The provisions in the Renewable Electricity Generation chapter provide a policy framework that:*
>
> *a. Better recognises and provides for the national significance of renewable electricity generation and the range of local, regional and national benefits associated with renewable electricity generation.*
>
> *b. Enables the development of renewable electricity generation activities in the District at all scales, while providing more specific direction on how to assess and manage adverse environment effects.*
>
> *c. Recognises the operational need and functional need of renewable electricity generation activities to be in particular locations.*
>
> *d. Protects renewable electricity generation activities from reverse sensitivity effects*.[1]"

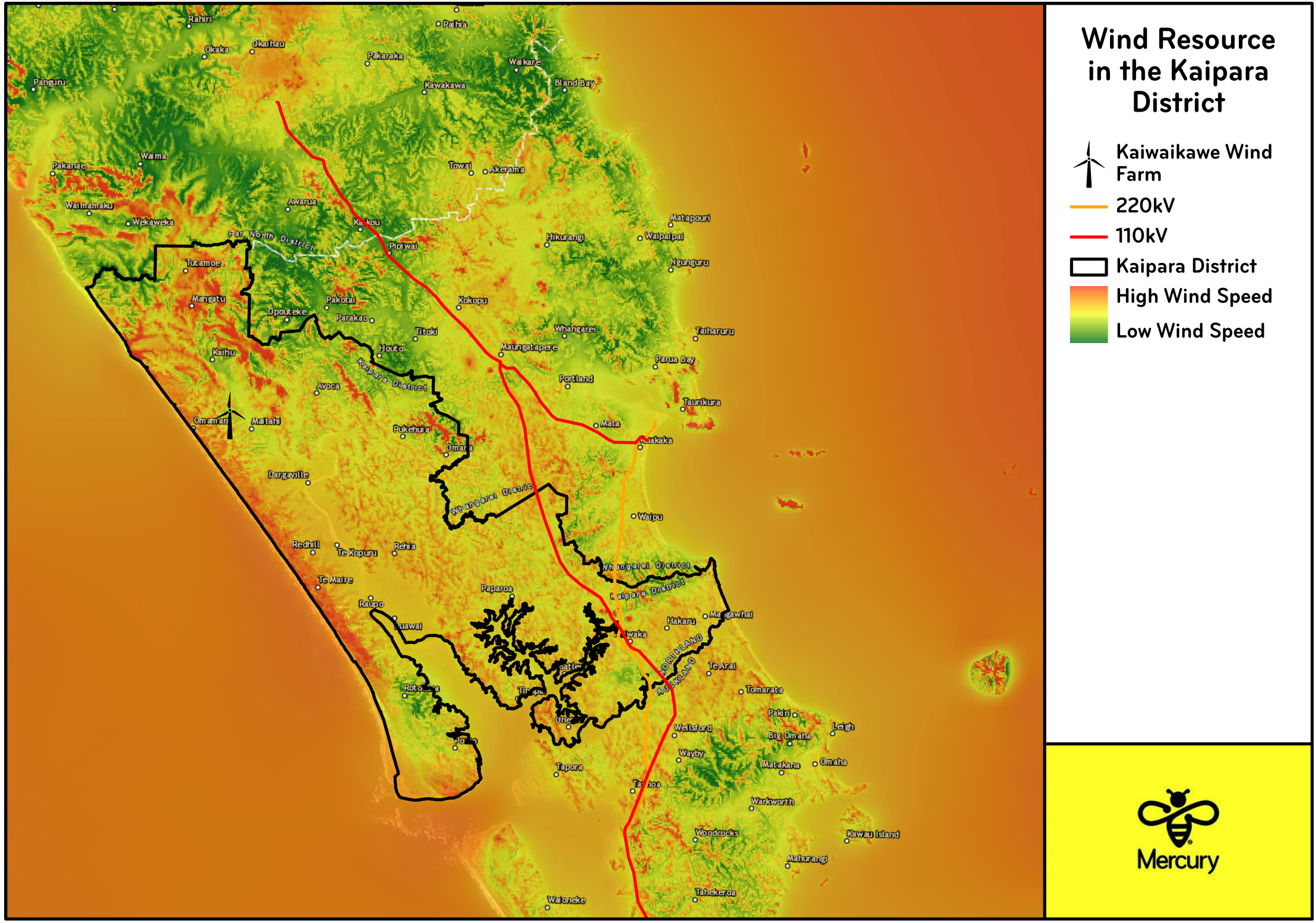
[1] Kaipara District Council, Section 32 Report - REG, 28 April 2025, page 6 / paragraph 19.

A new District Plan REG chapter is proposed, including objectives, policies and rules, along with definitions. A table setting out Mercury's submission points on the REG provisions in the PKDP is contained in **Appendix 2**.

The inclusion of a specific chapter for REG in the PKDP is strongly supported. Mercury's submission focusses on amendments to provisions to better provide enabling, directive provisions that recognise the national importance and benefits of REG to support New Zealand's climate change and electrification goals.

Yours sincerely,

Shirley Chamberlin
Principal Planner and Policy Advisor


Wind Resource in the Kaipara District
Kaiwaikawe Wind Farm
220kV
110kV
Kaipara District
High Wind Speed
Low Wind Speed
Mercury
Rahiri
Okaka
Okaihau
Pakaraka
Paihia
Waikare
Bland Bay
Kawakawa
Panguru
Waima
Pakanae
Waimamaku
Wekaweka
Awarua
Towai
Akerama
Kaikou
Pipiwai
Far North District
Tutamoe
Mangatu
Opouteke
Pakotai
Parakao
Kokopu
Hikurangi
Waipapai
Matapouri
Ngunguru
Titoki
Whangarei
Maungatapere
Taiharuru
Houto
Kaihu
Kaipara District
Avoca
Portland
Parua Bay
Taurikura
Omamari
Maitahi
Pukehuia
Omara
Mata
Jakaka
Dargaville
Whangarei District
Waipu
Redhill
Te Kopuru
Rehia
Te Maire
Paparoa
Raupo
Kaipara District
Hakaru
Maungawhai
Te Arai
NORTHLAND
AUCKLAND
Tomarata
Pakiri
Leigh
Wellsford
Big Omaha
Wayby
Matakana
Omaha
Tapora
Warkworth
Woodcocks
Kawau Island
Mahurangi
Tahekeroa
Waioneke

Attachment 2: Mercury submission on Proposed Kaipara District Plan

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
Part 2 – District-wide matters Energy, Infrastructure, and Transport Renewable Electricity Generation				
REG – Renewable Electricity Generation				
Objectives				
REG-01 **REG-O2** **REG-O3** **REG-O4**	**Benefits of renewable electricity generation** The benefits of increasing renewable electricity generation activities at all scales are realised in the Kaipara District. **Enabling renewable electricity generation to support well-being** Renewable electricity generation activities are enabled at all scales to support the environmental, economic, social and cultural well-being of people and communities in the Kaipara District **Managing adverse effects of renewable electricity generation** Renewable electricity generation activities are developed in a way that appropriately manages adverse effects on the environment **Adverse effects on renewable electricity generation activities** The efficient and effective operation, maintenance and upgrading of renewable electricity generation activities is not constrained or compromised by reverse sensitivity effects.	Support in part	Retain or Amend to reflect changes to the National Policy Statement for Renewable Electricity generation 2011 (gazetted replacement).	The proposed objectives are consistent with the NPS-REG 2011 and are generally supported. With the Government's recent consultation on the NPS-REG 2011 amendments, more directive provisions are proposed to support NZ climate change and electrification goals. The alternative relief sought is to provide scope to amend the objectives to reflect the terminology and future changes to NPS-REG 2011 (gazetted replacement).
Policies				
REG-P1	**National significance and benefits of renewable electricity generation activities** Recognise and provide for the national significance and local, regional and national benefits of renewable electricity generation activities, which include but are not limited to: 1. Using renewable rather than finite resources; 2. Maintaining and increasing the security, resilience, independence, diversity and	Support in part	Retain or Amend to reflect changes to the National Policy Statement for Renewable Electricity generation 2011 (gazetted replacement).	The proposed policy is consistent with the NPS-REG 2011 and is generally supported. With the Government's recent consultation on the NPS-REG 2011 amendments, more directive provisions are proposed to support NZ climate change and electrification goals. The alternative relief sought is to provide scope to amend the policy to reflect the terminology and future

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
	affordability of electricity supply in the Kaipara District; 3. Providing for the economic, social and cultural well-being of people and communities in the Kaipara District; and 4. The ability for rehabilitation to reverse the adverse effects on the environment of some renewable electricity technologies.			changes to the NPS-REG 2011 (gazetted replacement).
REG-P2	**Enable the effective development, operation, maintenance and upgrade of renewable electricity generation activities** 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.	Support in part	Add repowering and amend: **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 Kaipara District has areas with high wind speeds, as shown on the map attached as **Appendix 1**. Amending the policy to specifically reference and prioritise access to solar and wind energy resources would strengthen the provision. Adding reference to repowering supports the proposed repowering rule (see below).
REG-P3	**Recognising and providing for the functional need or operational need of renewable electricity generation activities** Recognise and provide for the operational need or functional need of renewable electricity generation activities to be in particular environments, including: 1. To be where the wind and solar energy resource is located; 2. To be in close proximity to transmission and distribution networks or its end use; and 3. To have sufficient land to support all renewable electricity generation activities.	Support in part	**Recognising and providing for the functional need or operational need of renewable electricity generation activities** Recognise and provide for the operational need or functional need of renewable electricity generation activities to be in particular environments, including: 1. To be where the wind ~~and solar~~ energy resource is located and to maximise solar gain; 2. To be in close proximity to transmission and distribution networks or its end use; and 3. To have sufficient land to support ~~all~~ ancillary renewable electricity generation activities.	The terms functional need and operational need are defined in the National Planning Standards and the addition of these definitions to the Plan is supported (see below), along with this policy. Two minor wording changes are sought to improve the clarity of the policy.

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
REG-P4	**Managing adverse effects of renewable electricity generation activities** Manage the adverse effects of renewable electricity generation activities by: 1. Recognising that there will be unavoidable adverse effects on the environment from renewable electricity generation activities; 2. Implementing effective mitigation measures, which may include: 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. Having regard to any proposed offsetting or compensation measures for adverse effects that cannot practicably be avoided, remedied or mitigated.	Support in part	**Managing adverse effects of renewable electricity generation activities** Manage the adverse effects of renewable electricity generation activities by: 1. Recognising that there will be unavoidable adverse effects on the environment from renewable electricity generation activities; 2. Implementing effective mitigation measures, which may include: a. Appropriate location and design; b. ~~Screening and setbacks~~ Separation from sensitive activities; c. Adaptive management measures; d. Rehabilitation of the site at the end of its operational life; and 3. Having regard to any proposed offsetting or compensation measures for adverse effects that cannot practicably be avoided, remedied or mitigated. Alternative relief: Amend to reflect changes to the National Policy Statement for Renewable Electricity generation 2011 (gazetted replacement).	The policy recognises the delivery of the nationally significant benefits of REG at any scale, and the need to give priority to those benefits over local adverse effects. Offsetting or compensation is not required to demonstrate net gain or no net loss but must minimise the net residual effect to the extent reasonably achievable while meeting the functional and operational need. With the Government's recent consultation on the NPS-REG 2011 amendments, more directive provisions are proposed to support NZ climate change and electrification goals. The alternative relief sought is to provide scope to amend the policy to reflect the terminology and future changes to the NPS-REG 2011 (gazetted replacement).
REG-P6	**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.	Support in part	Amend **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~~.	All REG, irrespective of whether it is 'small' or 'large-scale', contributes to achieving the NPS-REG objectives.

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
			recognise and provide for the national significance and benefits of REG activities	
REG-P7	**Providing for innovation and technological advances** Provide flexibility for new and existing renewable electricity generation activities to adopt new technologies and sources of renewable energy where this: 1. Increases the efficient use of renewable energy resources; 2. Allows for the re-use of existing infrastructure where appropriate; 3. Increases the resilience, safety, efficiency or reliability of renewable electricity generation activities; and 4. Results in environmental benefits and enhancements.	Support	Retain	Innovation and technological advances will be critical to NZ meeting its climate change and decarbonisation goals.
REG-P8	**Repowering of existing wind and solar generation activities** Recognise the benefits of enabling the repowering of existing wind and solar generation activities, including: 1. Efficient use of existing infrastructure; and 2. Potential for delivering increased renewable electricity generation output within an existing renewable electricity generation site.	Support in part	Amend **Repowering ~~of existing -~~ wind and solar ~~generation activities~~** Recognise the benefits of enabling the repowering of existing wind and solar generation activities, including: 1. Efficient use of existing infrastructure; and 2. Potential for delivering increased renewable electricity generation output ~~within an existing renewable electricity generation site.~~	Repowering provides an opportunity to deliver increased generation output and extend the operational life of the asset. When considering repowering, REG activities form part of the existing environment, particularly landscape, and communities are familiar with the operations. The policy would be clearer if reference to site was removed and the emphasis was simply on delivering increased generation.
REG-P9	**Managing reverse sensitivity** Manage 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 adverse	Support	Retain	Sensitive activities moving into areas where there is existing REG have the potential to constrain operations resulting in a loss of output and operational flexibility. Maintaining generation output from REG at all scales is important to achieving the Objectives (REG-01 and 02).

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
	effects on existing sensitive activities in close proximity.			
REG-P10	**Investigation of new renewable electricity generation sites and sources** 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.	Support in part	**Investigation of new renewable electricity generation sites and resources** 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.~~	A concise policy would be more directive and consistent with the enabling objective (REG-02).
Rules				
Investigation activities				
REG-R1 **General rural zone, Light industrial zone, Heavy industrial zone, Māori purpose zone**	**Temporary wind anemometer (wind monitoring mast)** 1. Activity status: Permitted Where: a. The height of the anemometer does not exceed: i. 80m in the General rural zone; or ii. 20m in the Light industrial zone, Heavy industrial zone, Māori purpose zone. b. No more than three anemometer are installed within a site; c. The anemometer is removed and site is remediated within 5 years of its installation; and d. The anemometer is setback at least a distance equal to the height of the anemometer from the boundary or any other site in different ownership.	Support in part	Amend ~~**Temporary wind anemometer (**~~**Wind monitoring mast(s)** 1. Activity status: Permitted Where: a. The height of the ~~anemometer~~ mast structure does not exceed: i. ~~80m~~ 100m in the General rural or zone; or ii. 20m in the Light industrial zone, Heavy industrial zone, Māori purpose zone. b. ~~No more than~~ A maximum of three ~~anemometer~~ wind masts are installed within a site; c. The ~~anemometer~~ wind mast is removed and site is remediated within 5 years of its installation; and d. The ~~anemometer~~ wind mast is setback at least a distance equal to the height of the ~~anemometer~~ mast structure from the boundary o~~r~~f any ~~other~~ site in different ownership. 2. Activity status when compliance	Wind monitoring masts are typically installed during the site investigation phase of wind farm development. Anemometers are used to measure wind speeds and are attached to mast structures. The proposed rule would be improved by amending the terminology to reflect the mast is the structure and anemometers is the equipment used to monitor wind speeds. In rural environments, wind monitoring mast(s) are typically: • 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.

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
			not achieved: ~~Restricted Discretionary~~ Controlled activity 3. Matters ~~over which discretion is restricted:~~ of control: a. ~~Adverse effects resulting from~~ the Location, design, height and ~~scale~~ number of the mast(s); b. ~~The siting, colour and number of structure(s);~~ c. Duration of the investigation ~~activity and the plans for its removal and remediation;~~ d. Operational need or functional need to be in the location; ~~e. Visual and landscape effects; and~~ ~~f. Any proposed measures to mitigate adverse effects.~~	The proposed 80 height in rural general zone is unduly restrictive and providing for a mast height of up to 100m along with simplified matters of control would be more consistent with the enabling investigation policies.
Operation, maintenance, and repair of existing renewable electricity generation activities				
REG-R2				
All zones	**Operation, maintenance and repair of existing renewable electricity generation activities** 1. Activity status: Permitted 2. Activity status when compliance not achieved: Not applicable	Support	Retain	Existing REG assets play an important role in securing and maintaining REG. Permitted activity status for maintaining existing assets is supported.
Large-scale renewable electricity generation **~~Large-scale r~~Renewable electricity generation**				
REG-R8	Large scale renewable energy generation activities 1. Activity status: Discretionary Where: a. Compliance is achieved with NZS 6808:2010 Acoustics - Wind farm noise for any proposal involving wind generation. 2. Activity status when compliance not achieved: Non-Complying	Support in part	~~Large scale r~~Renewable energy generation activities 1. Activity status: Restricted Discretionary Where: a. Compliance is achieved with NZS 6808:2010 Acoustics - Wind farm noise for any proposal involving wind generation. 2. Activity status when compliance not achieved: Discretionary ~~Non-Complying~~	Increasing REG has nationally significant benefits and these are attributable to REG at any scale. To reflect the directions of the more enabling policies, we request the status in this rule be amended from discretionary to restricted discretionary, with specific matters of discretion tailored to solar, wind and other REG. Adverse effects of activities associated with REG are generally well understood and there are effective mitigation measures for management of these effects.

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
			Matters of discretion Request specific matters of discretion for solar, wind and other REG.	With respect to wind, we consider discretionary status would be more appropriate where compliance with NZS 6808:2010 Acoustics - Wind farm noise is not achieved.
Upgrading and repowering				
REG-R9	**Upgrading or repowering existing renewable electricity generation activities** 1. Activity status: Permitted Where: a. The upgrade or repowering is located within the same site as the existing renewable electricity activity; b. Any replacement structure or building does not exceed the: i. Height of existing structures and buildings by more than 10%; ii. Footprint of existing structures and buildings by more than 25%; and c. For wind farms, compliance is achieved with NZS 6808:2010 Acoustics - Wind farm noise. 2. Activity status when compliance not achieved: Restricted Discretionary 3. Matters over which discretion is restricted: a. Any adverse environmental effects from the upgrade or repowering that are in addition to the existing renewable electricity generation activity; b. Proposed measures to mitigate adverse effects, including siting, design, colour, finish, or landscaping; and c. The benefits of maintaining or increasing generation output from an existing renewable electricity generation site.	Support in part	Permitted activity status is supported. Split the rule into two parts**:** A. Upgrading ~~or repowering~~ existing renewable electricity generation activities B. Repowering - wind and solar Relief 1: Delete parameters 1. a. and b. In the alternative, amend the parameters to enable A. upgrading and B. repowering. Relief 2: For wind farms, where compliance is not achieved 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. For any other parameters, when compliance is not achieved: controlled activity. Include appropriate matters of control.	The rule would benefit from being split into two parts: Part A - Upgrading existing renewable electricity generation activities Part B - Repowering –wind and solar Upgrading in relation to existing REG assets means increasing their capacity, resilience, efficiency, security, reliability, flexibility, longevity or safety. Repowering is specific to solar and wind REG assets and may be whole or partial replacement or upgrading to maintain or increase generation output and extend the operational life of the asset. The proposed parameters are arbitrary and inconsistent with the enabling objectives and policies. We request that these be either deleted or amended to be more enabling. As an alternative, consideration could be given to mapping via an overlay, sites with existing REG and thereby providing a basis for more enabling provisions.

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
			Relief 3 (alternative): Create a REG overlay on the planning maps with a corresponding activity status for upgrading and repowering.	
Renewable electricity generation activities not otherwise provided for				
REG-R10 All zones	Any other renewable electricity generation activity not provided for as a permitted, restricted discretionary, discretionary or non-complying activity 1. Activity status: Discretionary 2. Activity status when compliance not achieved: Not Applicable	Support in part	Add: …permitted, controlled, restricted discretionary, ...	If relief sought in respect of REG-R1 above is accepted, wind monitoring mast(s) would be a controlled activity. A consequential amendment to REG-R10 is required to include reference to controlled activities.
Definitions				
	COMMUNITY SCALE RENEWABLE ELECTRICITY GENERATION ACTIVITIES means renewable electricity generation supplying electricity to a local community.	Support in part	Amend: has the same meaning as the National Policy Statement for Renewable Electricity generation 2011 or gazetted replacement.	To provide clarity between the split of REG activities vs small and community-scale distributed electricity generation the definition from the NPS-REG 2011 (or its replacement) should be adopted: *"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."*
	FUNCTIONAL NEED means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.	Support	Retain	The inclusion of the definition of functional need consistent with the National Planning Standards (2019) is supported.
	LARGE-SCALE RENEWABLE ELECTRICITY GENERATION ACTIVITIES Means renewable electricity generation activities with greater generation output than community scale renewable electricity generation activities.	Support in part	Amend ~~**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	Our preferred approach is to rely on the definition of REG activities (see below). Within the rule framework separate provision could be made for small and community-scale REG.

Plan reference	Plan provision	Support / Oppose	Relief sought	Reasons for submission
			Electricity generation 2011 or gazetted replacement.	
	OPERATIONAL NEED means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.	Support	Retain	The inclusion of the definition of operational need consistent with the National Planning Standards (2019) is supported.
	RENEWABLE ELECTRICITY GENERATION ACTIVITIES means the construction, operation and maintenance of structures associated with renewable electricity generation. This includes 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.	Support in part	Retain or has the same meaning as the National Policy Statement for Renewable Electricity generation 2011 or gazetted replacement.	The definition reflects the NPS-REG 2011. With the Governments proposed replacement the terminology is likely to be revised and updated for example including reference to 'investigation', 'ancillary activities' and 'storage' (ie batteries). While the alternative relief cross-references to the NPS-REG, our preference is for the definition text to be included in the District Plan.
	REPOWERING EXISTING WIND AND SOLAR ELECTRICITY GENERATION ACTIVITIES means replacing more than 50% of the structures at an existing renewable generation facility (source: new, to support rules).	Support in part	**REPOWERING ~~EXISTING WIND AND SOLAR ELECTRICITY GENERATION ACTIVITIES~~** means ~~replacing more than 50% of the structures at an existing renewable generation facility~~ in relation to existing REG assets generating electricity from wind or solar, the whole or partial replacement to increase generation output and/or extend the operational life of the REG assets. or has the same meaning as the National Policy Statement for Renewable Electricity generation 2011 or gazetted replacement.	Reference to 50% is arbitrary and not supported. Should a replacement threshold be considered necessary this should be in the rule not the definition. We request the definition be amended to relate to the policy purpose of the provision, which is to increase generation output and/or extend the operation life of the REG assets. While the alternative relief cross-references to the NPS-REG, our preference is for the definition text to be included in the District Plan.