

Proposed Kaipara District Plan

Summary of Submissions

This document contains a summary of decisions requested by persons making submissions on the Proposed Kaipara District Plan in accordance with clause 7 of Schedule 1 of the Resource Management Act. The summary of decisions requested for Light was notified on 21 October 2025 and those submissions are therefore not included in this document.

Important Notes

- Where submissions are unclear, the summary of decisions requested contain the word *inferred*.
- This summary is **not a substitute** for reading the full submission. If you think your interests may be affected, please review the full submission online here: [PDP Submissions](#) - submissions are also available for viewing online at our offices and libraries in **Dargaville** or **Mangawhai**.
- Submission point numbers may not be sequential due to quality assurance checks.
- Submission numbers are unique identifiers and must be stated when making a further submission.

Guide to the Summary of Submissions

- Decisions are organized by provision number.
- Where specific wording changes have been requested in submissions, those changes shown as:
 - Underlined = new wording
 - ~~Strikethrough~~ = deletions

How to Make a Further Submission

- From 1 December to 15 December 2025, you can:
 - **Save time! Complete our easy online Form 6 here:** [PDP Online Form 6](#)
 - OR
 - **Download a pdf version of Form 6:** [Form 6 pdf version](#)
 - THEN
 - **Email it to:** districtplanreview@kaipara.govt.nz
 - **Post it to:** Planning and Policy Team, Kaipara District Council, Private Bag 1001, Dargaville 0340
 - **Deliver it to either Council office:** 32 Hokianga Road, Dargaville or 6 Molesworth Drive, Mangawhai
- Deadline: Further submissions close at 5:00pm on Monday 15 December 2025.**

Important: You must send a copy of your further submission to the original submitter **within 5 working days** of lodging it with Kaipara District Council. To access a list containing Submitter Contact Details, click [here](#).

Disclaimer:

This summary of submissions has been prepared and published in accordance with the Resource Management Act to assist the public in understanding the points raised by submitters. Kaipara District Council has used its best endeavours to accurately summarise the relief sought in the submissions, however, we cannot guarantee the accuracy or completeness of the information provided in this document.

Users are advised to take specific independent professional advice before taking any action as a result of information contained in this summary.

Please note that all original submissions and names of submitters are publicly available on the Council website. Submitters should read the full submission for themselves.

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Summary of Submissions for the topic of: Renewable Electricity Generation

Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
145.4	Electrify Te Taitokerau	General	Amend	DELETE the matters of discretion relating to "visual and landscape effects" from all REG 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)	<ul style="list-style-type: none"> 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.
149.22	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Amend	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. AND 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. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> 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: 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 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.
309.23	Clarus	General	Amend	AMEND the title of the Renewable electricity generation chapter to " <u>Renewable Energy Sources and Electricity Generation</u> ". AND AMEND the existing objectives, policies, and rules including their names as requested in other submission points. OR ADD additional objectives, policies, and rules that specifically address the generation of non-electrical renewable energy. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	<ul style="list-style-type: none"> 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.
309.29	Clarus	General	Amend	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> <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> AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	<ul style="list-style-type: none"> A further policy is required to provide support for renewable energy development other than electricity.
332.59	Northland Regional Council	General	Amend	RETAIN the objectives and policies in the Renewable electricity generation chapter other than those sought to be amended in other submission points	<ul style="list-style-type: none"> They are consistent with the Regional Policy Statement Objective 3.9 and Policies 5.4.1 to 5.4.3.
117.5	Greg Moore	General	Oppose	AMEND the Renewable electricity generation chapter to add standards for renewable electricity generation in Kaipara.	<ul style="list-style-type: none"> The submitter considers that there needs to be more thought and structure put into the way we move

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				Refer to the submission for examples of vibration and glare standards linked and attached.	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.
149.20	Royal Forest and Bird Protection Society of New Zealand Incorporated	General	Oppose	AMEND Renewable electricity generation rules so that activities are not enabled in overlays and sensitive environments. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> 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 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.
8.7	Dhivian Govender	General	Support	Support for partnerships with organisations to develop solar electricity generation, especially along the west coast where such work has already started.	<ul style="list-style-type: none"> Sustainable energy creates a safe and happy place and provides long-term benefits to the community. Kaipara District Council should embrace sustainable energy alternatives.
136.36	Federated Farmers of New Zealand (Inc) - Northland Province	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.	<ul style="list-style-type: none"> 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.
212.10	BA & JK Paton Ltd	General	Support	RETAIN the whole Renewable electricity generation chapter. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.
217.35	Cato Bolam Consultants Limited	General	Support	RETAIN the Renewable electricity generation chapter. AND Any other relief that is consistent with and/or consequential to the submission.	<ul style="list-style-type: none"> The submitter has sought this relief without limiting the scope of the submission on the details in other Proposed District Plan chapters or maps.
292.25	Transpower New Zealand Limited	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.	<ul style="list-style-type: none"> 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.
294.8	Birt & Currie Surveyors Limited	General	Support	RETAIN the permitted activity status for renewable energy land use in the Rural Zone.	<ul style="list-style-type: none"> Submitter supports the permitted status.
309.3	Clarus	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 AMEND the Renewable electricity generation chapter to cover other forms of renewable energy generation, consistent with the Northland Regional Policy Statement.	<ul style="list-style-type: none"> Background to the specific relief sought in Section 2 of the submission.
283.57	Northpower Limited and Northpower Fibre Limited	Notes	Support	RETAIN the notes in the Renewable electricity generation chapter as notified.	<ul style="list-style-type: none"> The submitter supports this note.
149.14	Royal Forest and Bird Protection Society of New Zealand Incorporated	Overview	Amend	AMEND the Overview to the Renewable electricity generation chapter to include "maintenance, operations and upgrading of renewable electricity generation" in the section describing where potential adverse effects on the environment may arise. AND RETAIN the explanation of other Part 2 provisions applying in the Overview to the Renewable electricity generation chapter. AND ADD more detailed cross-referencing to other Part 2 chapters in the Note. AND	<ul style="list-style-type: none"> 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. Detailed cross-referencing is requested in order to ensure the Proposed District Plan is clear and effective.

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				Any consequential amendments and alternative relief to address the concerns raised.	
304.39	Director General of Conservation	Overview	Amend	<p>AMEND the Overview in the Renewable electricity generation chapter as follows:</p> <p>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. While 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>	<ul style="list-style-type: none"> Opposes the Overview in part because, as drafted, it is ambiguous regarding whether Part 2 - District Wide Matters provisions apply to renewable electricity activities.
149.15	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-O1	Amend	<p>AMEND REG-O1 as follows:</p> <p>The benefits of increasing renewable electricity generation activities at all scales are realised <u>recognised</u>.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> 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).
283.43	Northpower Limited and Northpower Fibre Limited	REG-O1	Amend	<p>AMEND REG-O1 as follows:</p> <p>"REG-O1: Benefits of renewable electricity generation <u>activities</u>"</p> <p>The benefits of increasing renewable electricity generation activities at all scales are <u>recognised and provided for</u> realised in the Kaipara District."</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> 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.
309.24	Clarus	REG-O1	Amend	<p>AMEND REG-O1 as follows:</p> <p>The benefits of increasing renewable electricity generation activities and other renewable energy production and supply...</p> <p>AND</p> <p>AMEND the objective name of REG-O1 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>	<ul style="list-style-type: none"> Objective as proposed does not include other renewable energy sources.
326.1	Mercury NZ Limited	REG-O1	Support	<p>RETAIN REG-O1.</p> <p>OR</p> <p>AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).</p>	<ul style="list-style-type: none"> 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 has resulted in more directive provisions being proposed to support NZ'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.
149.16	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-O2	Amend	<p>AMEND REG-O2 as follows:</p> <p>Renewable electricity generation activities are enabled at all scales to where they support the environmental, economic, social and cultural well-being of people and communities in the Kaipara District.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> 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).
283.44	Northpower Limited and Northpower Fibre Limited	REG-O2	Amend	<p>AMEND the title of REG-O2 to read as follows:</p> <p>"REG-O2: Enabling Renewable electricity generation <u>Activities</u> to Support Wellbeing"</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> 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.
309.25	Clarus	REG-O2	Amend	<p>AMEND REG-O2 as follows:</p>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.

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				Renewable electricity generation activities <u>and other renewable energy production and supply...</u> AND AMEND the objective name of REG-O2 accordingly. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	
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).	<ul style="list-style-type: none"> 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.
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.	<ul style="list-style-type: none"> 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.
304.40	Director General of Conservation	REG-O3	Amend	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. AND Any further or alternative relief to like effect to that sought.	<ul style="list-style-type: none"> REG-O3 requires amendment to outline that adverse effects should be avoided, remedied, or mitigated.
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. AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
308.12	Fire and Emergency New Zealand	REG-O3	Support	RETAIN REG-O3 as notified.	<ul style="list-style-type: none"> 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.
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).	<ul style="list-style-type: none"> 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 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.
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	<ul style="list-style-type: none"> Does not include wider renewable energy sources.

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				Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	
283.46	Northpower Limited and Northpower Fibre Limited	REG-O4	Support	RETAIN REG-O4 as notified.	<ul style="list-style-type: none"> The submitter supports this objective.
326.4	Mercury NZ Limited	REG-O4	Support	RETAIN REG-O4. OR AMEND to reflect changes to the National Policy Statement for Renewable Electricity Generation (gazetted replacement).	<ul style="list-style-type: none"> 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. 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.
145.1	Electrify Te Taitokerau	REG-P1	Amend	ADD the following benefit to REG-P1 - <u>Reduced dependence on imported fossil fuels and related fiscal deficits and supply chain risks.</u>	<ul style="list-style-type: none"> 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 emissions and costs while ensuring a resilient and secure supply of onshore energy.
309.28	Clarus	REG-P1	Amend	AMEND REG-P1 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.	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
332.5	Northland Regional Council	REG-P1	Amend	RETAIN REG-P1.1. and REG-P1.2. AND AMEND REG-P1.3. to include environmental benefits, as well as economic, social and cultural benefits to people and communities.	<ul style="list-style-type: none"> The submitter supports clauses 1 and 2 of REG-P1 as these outline the benefits of renewable energy and the 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.
283.47	Northpower Limited and Northpower Fibre Limited	REG-P1	Support	RETAIN REG-P1 as notified.	<ul style="list-style-type: none"> The submitter supports this policy.
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).	<ul style="list-style-type: none"> 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.
145.2	Electrify Te Taitokerau	REG-P2	Amend	AMEND REG-P2 to include biomass, tidal, wave and ocean energy resources.	<ul style="list-style-type: none"> 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.

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
283.48	Northpower Limited and Northpower Fibre Limited	REG-P2	Amend	<p>AMEND the title and content of REG-P2 as follows:</p> <p>“REG-P2: Enable the effective development, operation, maintenance, repair and upgrade of renewable electricity generation activities”</p> <p>“ 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.”</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> 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.
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 Enable 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>	<ul style="list-style-type: none"> To ensure consistency with the terminology in the policy title, and the policy content. To ensure the policy is consistent with REG-O2.
326.6	Mercury NZ Limited	REG-P2	Amend	<p>AMEND REG-P2 as follows:</p> <p>Enable the effective development, operation, maintenance and upgrade of renewable electricity generation activities.</p> <p>Provide for the effective and efficient development, operation, maintenance, and upgrading <u>and repowering</u> of renewable electricity generation activities at a range of scales, from and <u>prioritising access to</u> solar and wind energy resources.</p>	<ul style="list-style-type: none"> 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.
332.6	Northland Regional Council	REG-P2	Amend	<p>AMEND REG-P2 as follows:</p> <p>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></p>	<ul style="list-style-type: none"> 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.
145.3	Electrify Te Taitokerau	REG-P3	Amend	<p>AMEND REG-P3 to include biomass, tidal, wave and ocean energy resources.</p>	<ul style="list-style-type: none"> 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 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.
309.98	Clarus	REG-P3	Amend	<p>AMEND REG-P3 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>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
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 ancillary renewable electricity generation activities.</p>	<ul style="list-style-type: none"> 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.
332.7	Northland Regional Council	REG-P3	Amend	<p>AMEND REG-P3 as follows:</p>	<ul style="list-style-type: none"> District plan policies should enable a range of renewable energy activities as technology continues

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				<ol style="list-style-type: none"> To be where the wind and solar renewable energy resource is located e.g. wind and solar; To be in close proximity to transmission and distribution networks or its end use; and To have sufficient space land to support all renewable electricity generation activities. 	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 renewable electricity generation can occur in 'space' rather than just on 'land' and this should be provided for (e.g., roof-mounted solar panels).
283.49	Northpower Limited and Northpower Fibre Limited	REG-P3	Support	RETAIN REG-P3 as notified.	<ul style="list-style-type: none"> The submitter supports this policy.
304.41	Director General of Conservation	REG-P4	Amend	<p>AMEND REG-P4 as follows:</p> <ol style="list-style-type: none"> Recognising that there will be unavoidable adverse effects on the environment from renewable electricity generation activities; Implementing effective mitigation measures to <u>avoid, remedy or mitigate adverse effects</u> which may include: <ol style="list-style-type: none"> Appropriate location and design; <u>Locating large-scale renewable electricity generation activities outside of sensitive Overlay areas;</u> Screening and setbacks from sensitive activities; Adaptive management measures; Rehabilitation of the site at the end of its operational life; and 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>AND Any alternative or consequential relief.</p>	<ul style="list-style-type: none"> 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 management hierarchy starting with avoidance. As activities can be avoided by not occurring, REG-P4 should not recognise unavoidable effects. 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).
309.99	Clarus	REG-P4	Amend	<p>AMEND REG-P4 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>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
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>	<ul style="list-style-type: none"> 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. 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.
149.17	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-P4	Oppose	<p>AMEND REG-P4 as follows:</p> <p>Manage the adverse effects of renewable electricity generation activities by:</p> <ol style="list-style-type: none"> Recognising that there will <u>may</u> be unavoidable adverse effects on the environment from renewable electricity generation activities; <u>Considering whether the proposed location is appropriate having regard to the scale of adverse effects</u> Implementing effective mitigation measures, which may include: <ol style="list-style-type: none"> Appropriate location and design; Screening and setbacks from sensitive activities; 	<ul style="list-style-type: none"> 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. The NPS-REG expressly supports the development of renewable electricity generation but not at the expense of managing environmental effects. NPS-REG

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				<p>c. Adaptive management measures;</p> <p>d. Rehabilitation of the site at the end of its operational life; and</p> <p>4. Having regard to any proposed offsetting or compensation measures for <u>residual</u> adverse effects that cannot <u>practicably</u> be avoided, remedied or mitigated.</p> <p>AND</p> <p>DELETE REG-P4.3 (would be renumbered '4' as per amendments requested above).</p> <p>OR</p> <p>AMEND REG-P4 to include a reference to other relevant chapters such as 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>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> <ul style="list-style-type: none"> 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 locating activities may be inappropriate. 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.
283.50	Northpower Limited and Northpower Fibre Limited	REG-P4	Support	RETAIN REG-P4 as notified.	<ul style="list-style-type: none"> The submitter supports this policy.
308.13	Fire and Emergency New Zealand	REG-P4	Support	RETAIN REG-P4 as notified.	<ul style="list-style-type: none"> 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.
304.42	Director General of Conservation	REG-P5	Amend	<p>ADD the following clause to REG-P5 as follows:</p> <p>When considering proposed small-scale and community-scale renewable electricity generation activities, have particular regard to:</p> <ol style="list-style-type: none"> The comparatively lower level of environmental effects that result from small scale and community scale renewable electricity generation activities; and <u>Avoiding or minimising adverse effects on sensitive values in Overlay areas; and</u> ... <p>AND</p> <p>Any alternative or consequential relief.</p>	<ul style="list-style-type: none"> REG-P5 should be amended to address cumulative adverse effects of small and community scale electricity generation on sensitive values.
309.100	Clarus	REG-P5	Amend	<p>AMEND REG-P5 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities and other renewable energy production and supply...</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>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
283.51	Northpower Limited and Northpower Fibre Limited	REG-P5	Support	RETAIN REG-P5 as notified.	<ul style="list-style-type: none"> The submitter supports this policy.
304.43	Director General of Conservation	REG-P6	Amend	<p>AMEND REG-P6 as follows:</p> <p>Enabling Considering large scale renewable electricity generation activities</p> <p>AND</p> <p>Any alternative or consequential relief.</p>	<ul style="list-style-type: none"> 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.
309.101	Clarus	REG-P6	Amend	<p>AMEND REG-P6 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities and other renewable energy production and supply...</p>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.

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				<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>	
326.9	Mercury NZ Limited	REG-P6	Amend	<p>AMEND REG-P6 as follows:</p> <p>Enabling large-scale renewable electricity generation activities.</p> <p>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>	<ul style="list-style-type: none"> 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.
283.52	Northpower Limited and Northpower Fibre Limited	REG-P6	Support	<p>RETAIN REG-P6 as notified.</p>	<ul style="list-style-type: none"> The submitter supports this policy.
309.102	Clarus	REG-P7	Amend	<p>AMEND REG-P7 wherever the term "renewable electricity generation" appears to:</p> <p>...renewable electricity generation activities and other renewable energy production and supply...</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>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
283.53	Northpower Limited and Northpower Fibre Limited	REG-P7	Support	<p>RETAIN REG-P7 as notified.</p>	<ul style="list-style-type: none"> The submitter supports this policy.
326.10	Mercury NZ Limited	REG-P7	Support	<p>RETAIN REG-P7 as notified.</p>	<ul style="list-style-type: none"> The submitter supports REG-P7 and sees innovation and technological advancement as being critical to New Zealand meeting climate change and decarbonisation goals.
149.18	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-P8	Amend	<p>AMEND REG-P8 as follows:</p> <p>Recognise the benefits of enabling the repowering of existing wind and solar renewable electricity generation activities, including:</p> <ol style="list-style-type: none"> Efficient use of existing infrastructure; and Potential for delivering increased renewable electricity generation output within an existing renewable electricity generation site. <p>Where repowering increases the magnitude and scale of effects, avoid, remedy or mitigate any adverse effects on the environment in accordance with REG-P4.</p> <p>AND</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<ul style="list-style-type: none"> 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.
283.54	Northpower Limited and Northpower Fibre Limited	REG-P8	Amend	<p>AMEND REG-P8 as follows:</p> <p>"Recognise and provide for the benefits of enabling the repowering of existing wind and solar generation activities, including:</p> <p>..."</p> <p>AND</p> <p>Any further necessary consequential amendments as required.</p>	<ul style="list-style-type: none"> To include the benefits of enabling the repowering of existing wind and solar generation activities.
326.11	Mercury NZ Limited	REG-P8	Amend	<p>AMEND REG-P8 as follows:</p> <p>Repowering of existing wind and solar generation activities</p> <p>Recognise the benefits of enabling the repowering of existing wind and solar generation activities, including:</p> <ol style="list-style-type: none"> Efficient use of existing infrastructure; and Potential for delivering increased renewable electricity generation output within an existing renewable electricity generation site. 	<ul style="list-style-type: none"> 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

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Submission point No.	Submitter	Provision	Position	Summary of decision requested	Reasons
					placing emphasis on the delivery of increased generation.
283.55	Northpower Limited and Northpower Fibre Limited	REG-P9	Amend	<p>AMEND the title and contents of REG-P9 as follows:</p> <p>"REG-P9: Managing Avoiding reverse sensitivity"</p> <p>Manage Avoid 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 effects on existing sensitive activities in close proximity. <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> • 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.
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 reverse sensitivity 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>	<ul style="list-style-type: none"> • 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.
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>	<ul style="list-style-type: none"> • Does not include wider renewable energy sources.
326.12	Mercury NZ Limited	REG-P9	Support	<p>RETAIN REG-P9 as notified.</p>	<ul style="list-style-type: none"> • 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.
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> <p>Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.</p>	<ul style="list-style-type: none"> • Does not include wider renewable energy sources.
326.13	Mercury NZ Limited	REG-P10	Amend	<p>AMEND REG-P10 as follows:</p> <p>Investigation of new renewable electricity generation sites and resources</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 both the need for flexibility and the temporary nature of any adverse effects of these activities.</p>	<ul style="list-style-type: none"> • Supports REG-P10 in part but requests amendments to make the policy more concise so it is directive and consistent with REG-O2.
149.19	Royal Forest and Bird Protection Society of New	REG-P10	Oppose	<p>AMEND REG-P10 to make the reference to 'the need for flexibility' clearer,</p> <p>AND</p> <p>AMEND REG-P10 as follows:</p>	<ul style="list-style-type: none"> • 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

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	Zealand Incorporated			<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</p> <p>Any consequential amendments and alternative relief to address the concerns raised.</p>	<p>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.</p>
283.56	Northpower Limited and Northpower Fibre Limited	REG-P10	Support	RETAIN REG-P10 as notified.	<ul style="list-style-type: none"> The submitter supports this policy.
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>	<ul style="list-style-type: none"> 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.
283.58	Northpower Limited and Northpower Fibre Limited	REG-R1	Amend	<p>AMEND REG-R1 to apply to all zones.</p> <p>AND</p> <p>Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> 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.
304.44	Director General of Conservation	REG-R1	Amend	<p>ADD the following matters of discretion to REG-R1.3.:</p> <p>x. Any adverse effects on ecosystems and indigenous biodiversity.</p> <p>x. Any adverse effects on sensitive values in Overlay areas.</p> <p>AND</p> <p>Any alternative or consequential relief.</p>	<ul style="list-style-type: none"> 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.
326.14	Mercury NZ Limited	REG-R1	Amend	<p>AMEND REG-R1 as follows:</p> <p>Temporary wind anemometer (Wind monitoring mast(s))</p> <ol style="list-style-type: none"> Activity status: Permitted Where: <ol style="list-style-type: none"> The height of the anemometer mast structure does not exceed: <ol style="list-style-type: none"> 80m-100m in the General rural or zone; or 20m in the Light industrial zone, Heavy industrial zone, Māori purpose zone. No more than A maximum of three anemometer wind masts are installed within a site; The anemometer wind mast is removed and site is remediated within 5 years of its installation; and 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. Activity status when compliance not achieved: Restricted Discretionary <u>Controlled</u> activity Matters over which discretion is restricted of control: <ol style="list-style-type: none"> Adverse effects resulting from the Location, design, height and scale number of the mast(s); The siting, colour and number of structure(s); Duration of the investigation activity and the plans for its removal and remediation; 	<ul style="list-style-type: none"> The submitter notes that wind monitoring masts are typically installed during the site investigation phase of wind farm development and anemometers are attached to mast structures and used to measure wind speeds. In light of this, REG-R1 would benefit from amending terminology used. 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.

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				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.	
309.30	Clarus	REG-R2	Amend	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> ". AND Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	<ul style="list-style-type: none"> Does not include wider renewable energy sources.
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 Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> 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 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.
283.59	Northpower Limited and Northpower Fibre Limited	REG-R2	Support	RETAIN REG-R2 as notified.	<ul style="list-style-type: none"> The submitter supports this rule.
326.15	Mercury NZ Limited	REG-R2	Support	RETAIN REG-R2 as notified.	<ul style="list-style-type: none"> Supports the permitted activity status for maintaining existing assets as existing assets play an important role in securing and maintaining renewable electricity generation.
149.24	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-R3	Amend	AMEND REG-R3 to include standards relating to the management of effects on indigenous fauna, such as: <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. AND ADD 'effects on indigenous biological diversity' to REG-R3 as a matter of discretion. AND Any consequential amendments and alternative relief to address the concerns raised.	<ul style="list-style-type: none"> 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.
304.45	Director General of Conservation	REG-R3	Amend	ADD the following matters of discretion to REG-R3.3.: <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.	<ul style="list-style-type: none"> 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. The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.
283.60	Northpower Limited and Northpower Fibre Limited	REG-R3	Support	RETAIN REG-R3 as notified.	<ul style="list-style-type: none"> The submitter supports this rule.
149.25	Royal Forest and Bird Protection Society of New Zealand Incorporated	REG-R4	Amend	AMEND REG-R4 to include standards relating to the management of effects on indigenous fauna, such as: <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. AND	<ul style="list-style-type: none"> 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-reflective materials for solar generation and including consideration of effects on indigenous species within the matters of discretion.

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				ADD 'effects on indigenous biological diversity' to REG-R4 as a matter of discretion. AND Any consequential amendments and alternative relief to address the concerns raised.	
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> <u>x. Any adverse effects on sensitive values in Overlay areas.</u> AND Any alternative or consequential relief.	<ul style="list-style-type: none"> REG-R4 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.
283.61	Northpower Limited and Northpower Fibre Limited	REG-R4	Support	RETAIN REG-R4 as notified.	<ul style="list-style-type: none"> The submitter supports this rule.
283.62	Northpower Limited and Northpower Fibre Limited	REG-R5	Amend	AMEND REG-R5 to apply to all zones consistently. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> 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.
304.47	Director General of Conservation	REG-R5	Amend	ADD the following matters of discretion to REG-R5.3.: <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.	<ul style="list-style-type: none"> REG-R5 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.
332.8	Northland Regional Council	REG-R5	Amend	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. AND ADD a new matter of discretion to REG-R5.3. regarding setback distances from key habitats of at-risk or threatened species.	<ul style="list-style-type: none"> 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. 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.
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.	<ul style="list-style-type: none"> 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.
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. 	<ul style="list-style-type: none"> Rule is overly restrictive, without any perceptible benefit to the restriction.
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>	<ul style="list-style-type: none"> 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.

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				AND Any alternative or consequential relief.	<ul style="list-style-type: none"> The submitter requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.
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 AMEND this rule to apply to all zones consistently. AND Any further necessary consequential amendments required.	<ul style="list-style-type: none"> 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. To be aligned with the approach taken with Renewable electricity generation chapter of the Proposed Far North District Plan. The rule should be applied to 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.
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.	<ul style="list-style-type: none"> 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.
308.14	Fire and Emergency New Zealand	REG-R7	Amend	AMEND REG-R7, as follows: ... 2. Matters over which control is reserved: ... <u>f. Proposed measures to mitigate fire risk.</u> 4. Matters over which discretion is restricted: ... <u>i. Proposed measures to mitigate fire risk.</u>	<ul style="list-style-type: none"> Amendment sought to require consideration of fire risk.
332.9	Northland Regional Council	REG-R7	Amend	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): <u>Effects on ecosystem health and indigenous biodiversity.</u>	<ul style="list-style-type: none"> 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. 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.
283.65	Northpower Limited and Northpower Fibre Limited	REG-R8	Amend	AMEND the title and content of REG-R8 as follows: Large scale renewable energy electricity generation activities 1. Activity status: Discretionary <u>Restricted Discretionary</u> Where: a. Compliance is achieved with NZS 6808:2010 Acoustics – Wind Farm noise for any proposal involving wind generation. 2. <u>Matters over which discretion is restricted:</u> a. <u>The location, scale and intensity of the activity;</u> b. <u>Shadow flicker and glare;</u> c. <u>Visual and landscape effects;</u> d. <u>Noise and vibration effects;</u> e. <u>Functional need or operational need to be in the location;</u> f. <u>The significant national or regional benefits associated with the activity;</u> g. <u>Proposed measures to mitigate adverse effects, including siting, design, colour, finish, or landscaping; and</u>	<ul style="list-style-type: none"> Adverse effects associated with large scale renewable electricity generation are readily understandable. Non-compliance should result in a Discretionary activity status although no reason for this is provided. The rule title should be amended to remain consistent with the other provisions in the Renewable electricity generation chapter.

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				<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>	
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>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>AND Any consequential or alternative relief.</p>	<ul style="list-style-type: none"> 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 General rural zone and not subject to any overlay.
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>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 amendments to similar effect.</p>	<ul style="list-style-type: none"> 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.
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 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: <u>Discretionary</u> Non-Complying <u>Matters of discretion</u> Request specific matters of discretion for solar, wind and other renewable electricity generation.</p>	<ul style="list-style-type: none"> 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. 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.
283.66	Northpower Limited and Northpower Fibre Limited	REG-R9	Amend	<p>DELETE the height limit in REG-R9.1.b.i. AND Any further necessary consequential amendments required.</p>	<ul style="list-style-type: none"> 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.
304.50	Director General of Conservation	REG-R9	Amend	<p>ADD the following clause to REG-R9.1.a. as follows:</p> <p>a. The upgrade or repowering is located:</p> <p>i. Within the same site as the existing renewable electricity activity;</p> <p>ii. Within the General rural zone;</p> <p>iii. Outside any Overlay.</p> <p>b. ...</p> <p>AND ADD the following matters of discretion to REG-R9.3.: <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.</p>	<ul style="list-style-type: none"> 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 requests that matters of discretion regarding effects on ecosystems, indigenous biodiversity and sensitive areas are included.
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>	<ul style="list-style-type: none"> 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

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					<p>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.</p> <ul style="list-style-type: none"> 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.
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> <ol style="list-style-type: none"> Upgrading or repowering existing renewable electricity generation activities. Repowering - wind and solar. <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>ADD a renewable electricity generation overlay on the planning maps with a corresponding activity status for upgrading and repowering.</p>	<ul style="list-style-type: none"> Upgrading in relation to existing renewable electricity generation assets means increasing their capacity, resilience, efficiency, security, reliability, flexibility, longevity or safety. 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. The proposed parameters are arbitrary and inconsistent with the enabling objectives and policies.
304.52	Director General of Conservation	REG-R10	Amend	<p>AMEND the activity status in REG-R10 as follows:</p> <ol style="list-style-type: none"> Activity status: Discretionary Non-Complying <p>AND</p> <p>Any further or alternative relief to like effect to that sought.</p>	<ul style="list-style-type: none"> The submitter opposes the discretionary activity status provided in REG-R10. No specific reasons are provided.
308.17	Fire and Emergency New Zealand	REG-R10	Amend	<p>AMEND REG-R10, as follows:</p> <p>...</p> <ol style="list-style-type: none"> 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> <ol style="list-style-type: none"> <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>OR</p> <p>Amendment to similar effect.</p>	<ul style="list-style-type: none"> 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 Councils functions under Section 31 of the RMA. 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.
309.31	Clarus	REG-R10	Amend	<p>AMEND the title of REG-P10 to: Renewable electricity energy generation activities not otherwise provided for</p> <p>AND</p> <p>AMEND the text of REG-P10, as follows: Any other renewable electricity generation activity or other renewable energy production and supply.</p> <p>AND</p>	<ul style="list-style-type: none"> Does not include wider renewable energy sources.

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				Any necessary consequential changes to the Proposed District Plan that are required to give effect to the submission.	
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).	<ul style="list-style-type: none"> Consequence of changes requested to REG-R1.
283.67	Northpower Limited and Northpower Fibre Limited	REG-R10	Support	RETAIN REG-R10 as notified.	<ul style="list-style-type: none"> The submitter supports this rule as worded.