

# Energy Infrastructure and Transport / Renewable Electricity Generation

| Sub-part / Chapter / Provision   | Submitter Name  | Sub No / Point No | Position       | Summary of Submission  | Decisions Requested  |
|--|---|-------------------|----------------|--|--|
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Victoria University of Wellington Students' Association                                     | 123.18            | Not specified  | [No specific reason given beyond decision requested - refer to original submission].   | Seeks that native animals are considered when planning large-scale renewable electricity generation activities.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Avryl Bramley   | 202.30            | Amend          | [No specific reason given beyond decision requested - refer to original submission]  | Seeks the removal of any provisions which restrict the ability of a property owner to generate own use power on site.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Bruce Crothers  | 319.5             | Not specified  | Considers that distributed solar generation should be encouraged and supported.  | Not specified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Royal Forest and Bird Protection Society  | 345.95            | Not specified  | Considers that for the overall chapter, the provisions should be no less protective than those in the ECO chapter. The provisions in this chapter should mirror the ECO provisions, with the amendments made as sought by F&B in respect of that chapter. Delete any references to 'operational need', and 'identified' values.  | Amend the chapter to mirror the Ecosystems and Indigenous Biodiversity provisions, and be as protective as that chapter. Delete all references to "operational need" and "identified" values in the chapter.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Royal Forest and Bird Protection Society  | 345.96            | Oppose in part | Considers the Introduction is silent on the potential adverse effects from renewable electricity generation on indigenous biodiversity, landscape and natural character values. Amend to make it clear that these are important values that may be adversely affected, and which require protection.   | Amend REG-Introduction to clarify that indigenous biodiversity, landscape, and natural character values are important values that may be affected by renewable energy generation, and that these values require protection.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Royal Forest and Bird Protection Society  | 345.97            | Oppose in part | Considers the objectives REG-01 to REG-04 are inadequate to protect indigenous biodiversity. Seeks that the objectives of the relevant chapters, including Ecosystems and Indigenous Biodiversity, Natural Character, Natural Features and Landscapes, and Coastal Environment apply to all Renewable Electricity Generation provisions. Alternatively, seeks that a comprehensive set of objectives to be included into the REG chapter to provide for these matters, mirroring the objectives of the aforementioned chapters. Notes that the key NPS policy is C2: When considering any residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected. | Amend chapter so that Ecosystems and Indigenous Biodiversity, Natural Character, Natural Features and Landscapes, and Coastal Environment objectives all apply to Renewable Energy Generation provisions, and ensure that NPS policy C2 is given effect to through the objectives. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | Greater Wellington Regional Council   | 351.100           | Support        | Supports the provisions and direction in this chapter, including the recognition of the contributions that renewable energy can make to greenhouse gas emissions reduction. The chapter enables small scale renewable energy generation and provides for community and large-scale renewable energy generation. This direction is consistent with Proposed RPS Change 1 climate change policies, particularly Policy 11, and connects to the SRCC strategic objectives.  | Retain provision, subject to amendments, as outlined other submission points.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | BP Oil New Zealand, Mobil Oil New Zealand Limited and Z Energy Limited (the Fuel Companies) | 372.69            | Support        | The Renewable Electricity Generation chapter is supported, as it signals a direction to reduce carbon emissions and effects on climate change through the use of renewable energy technologies. This direction is reflected in the Renewable Energy Generation chapter which seeks to enable large and small-scale renewable energy investigation and generation activities.   | Retain the Renewable Electricity Generation chapter as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / General REG | 350 Wellington  | 396.1             | Not specified  | Supports the enabling and encouraging small and community-scale renewable energy generation projects.  | Not specified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-01      | Meridian Energy Limited   | 228.31            | Support        | Considers the objective gives effect to the NPS-REG, the plan's Strategic Objectives and promotes an increase in renewable electricity generation.   | Retain Objective REG-01 (Benefits of renewable energy use and development) as notified.  |

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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-01 | Transpower New Zealand Limited           | 315.159           | Support         | Supports the directive of the objective to enable the use and development of the renewable energy sources.   | Retain Objective REG-01 (Benefits of renewable energy use and development) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-01 | Greater Wellington Regional Council      | 351.101           | Amend           | Considers the District Plan going as far as it can to promote energy efficient design of buildings and developments, including alterations to have regard to Policy 11 of Proposed RPS Change 1.   | Seeks to ensure the renewable electricity generation and subdivision provisions have regard to Policy 11 of Proposed RPS Change 1 such that the District Plan goes as far as it can to promote energy efficient design of buildings and developments and enable renewable energy generation. This could also include provisions in the zones chapters.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-01 | Wellington International Airport Ltd     | 406.170           | Support         | Supports REG-01 insofar as it encourage and enable the development of renewable energy and thus will help submitter achieve its sustainability and climate change goals.<br><br>[See paragraph 4.25 to 4.29 of original submission for further detail.]  | Retain REG-01 (Benefits of renewable energy use and development) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-02 | M&P Makara Family Trust                  | 159.2             | Amend           | Considers that the addition of "...and the potential national benefits" subsequent to the DDP is unnecessary. National benefit is recognised by REG-01 and unfairly weights REG-02 in favour of the renewable generation activity, which is and should not be the point of this Objective. Between the two objectives the appropriate balance is achieved. | Amend REG-02 (Adverse effects of renewable electricity generation activities) as follows:<br><br>The actual and potential adverse effects on the environment and communities of the investigation, development, operation, maintenance and repair, and upgrading of renewable electricity generation activities are effectively managed, while recognising the functional needs and operational needs of renewable electricity generation activities <del>and the potential national benefits.</del>           |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-02 | Meridian Energy Limited                  | 228.32            | Support in part | Supports the outcome sought by Objective REG-02 (adverse effects of renewable electricity generation activities) but considers the wording might be improved by deleting some superfluous words.   | Retain Objective REG-02 (Adverse effects of renewable electricity generation activities) with amendment.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-02 | Meridian Energy Limited                  | 228.33            | Amend           | Supports the outcome sought by Objective REG-02 (adverse effects of renewable electricity generation activities) but considers the wording might be improved by deleting some superfluous words.   | Amend Objective REG-02 (Adverse effects of renewable electricity generation activities) as follows:<br><br>The actual and potential adverse effects on the environment and communities of the investigation, development, operation, maintenance and repair, and upgrading of renewable electricity generation activities are effectively managed, while recognising the functional needs and operational needs <del>of renewable electricity generation activities</del> and the potential national benefits. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-02 | Royal Forest and Bird Protection Society | 345.98            | Oppose in part  | In addition to the above submission point, considers that REG-02 needs revision to clarify that certain natural values need protection, rather than adverse effects being 'effectively managed'.   | Amend REG-02 (Adverse effects of renewable electricity generation activities) to clarify that some values require protection.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-02 | Wellington International Airport Ltd     | 406.171           | Support         | Supports REG-02 insofar as it encourage and enable the development of renewable energy and thus will help submitter achieve its sustainability and climate change goals.<br><br>[See paragraph 4.25 to 4.29 of original submission for further detail.]  | Retain REG-02 (Adverse effects of renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-03 | Meridian Energy Limited                  | 228.34            | Support         | Considers the objective is important for maintaining the operability and efficiency of existing renewable electricity generation activities.   | Retain Objective REG-03 (Adverse effects on renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-03 | Wellington International Airport Ltd     | 406.172           | Support         | Supports REG-03 insofar as it encourage and enable the development of renewable energy and thus will help submitter achieve its sustainability and climate change goals.<br><br>[See paragraph 4.25 to 4.29 of original submission for further detail.]  | Retain REG-03 (Adverse effects on renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-04 | Greater Wellington Regional Council      | 351.102           | Amend           | Considers the District Plan going as far as it can to promote energy efficient design of buildings and developments, including alterations to have regard to Policy 11 of Proposed RPS Change 1.   | Seeks to ensure the renewable electricity generation and subdivision provisions have regard to Policy 11 of Proposed RPS Change 1 such that the District Plan goes as far as it can to promote energy efficient design of buildings and developments and enable renewable energy generation. This could also include provisions in the zones chapters.   |

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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-O4 | Wellington International Airport Ltd     | 406.173           | Support         | Supports REG-O4 insofar as they encourage and enable the development of renewable energy and thus will help submitter achieve its sustainability and climate change goals.<br><br>[See paragraph 4.25 to 4.29 of original submission for further detail.]   | Retain REG-O4 (Energy efficiency and conservation) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P1 | Meridian Energy Limited                  | 228.35            | Support         | Considers that Policy REG-P1 is necessary to give effect to the NPS-REG and the Plan's Reg and Strategic objectives.  | Retain Policy REG-P1 (Recognising the significance and benefits of the use and development of renewable energy) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P1 | Transpower New Zealand Limited           | 315.160           | Support         | Supports the policy recognition of the benefits of the use and development of renewable energy sources and generation.  | Retain Policy REG-P1 (Recognising the significance and benefits of the use and the development of renewable energy) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P1 | Royal Forest and Bird Protection Society | 345.99            | Support in part | Considers that as the objectives and policies of the Natural Environment Values and Coastal Environment chapters are not intended to apply to this chapter, this policy needs to include clauses recognising that natural values need to be protected, and may be adversely impacted by renewable generation.   | Amend REG-P1 (Recognising the significance and benefits of the use and development of renewable energy) to include clauses recognising that natural values need protection as they may be adversely affected by renewable energy generation.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P1 | Greater Wellington Regional Council      | 351.103           | Amend           | Considers the District Plan going as far as it can to promote energy efficient design of buildings and developments, including alterations to have regard to Policy 11 of Proposed RPS Change 1.  | Seeks to ensure the renewable electricity generation and subdivision provisions have regard to Policy 11 of Proposed RPS Change 1 such that the District Plan goes as far as it can to promote energy efficient design of buildings and developments and enable renewable energy generation. This could also include provisions in the zones chapters. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P1 | Wellington International Airport Ltd     | 406.174           | Support         | Supports REG-P1 insofar as they encourage and enable the development of renewable energy and thus will help submitter achieve its sustainability and climate change goals.<br><br>[See paragraph 4.25 to 4.29 of original submission for further detail.]   | Retain REG-P1 (Recognising the significance and benefits of the use and development of renewable energy) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P2 | Meridian Energy Limited                  | 228.36            | Support         | Considers that Policy Reg-P2 is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.  | Retain Policy REG-P2 (Providing for renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P2 | Transpower New Zealand Limited           | 315.161           | Support         | Supports the policy recognition of the constraints and needs of renewable electricity generation activities, and the benefits of locating renewable electricity generation activities close to end use and to electricity transmission infrastructure. Considers the policy provides the framework to appropriately consider the issues with renewable electricity generation   | Retain Policy RED-P2 (Providing for renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P2 | Royal Forest and Bird Protection Society | 345.100           | Oppose in part  | Considers that the policy is silent on the need to protect natural values. Given that the objectives and policies of the Natural Environment Values and Coastal Environment chapters are not intended to apply to this chapter, considers this policy needs to be amended to include clauses requiring that natural and coastal values are protected and should also clarify what the relationship between this policy and the later policies of this chapter are, as the later policies already appear to provide comprehensive decision making guidance | Amend REG-P2 (Providing for renewable electricity generation activities) to include clauses recognising that natural values need protection, and clarify the relationship between this policy and subsequent policies.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P2 | Wellington International Airport Ltd     | 406.175           | Support         | Supports REG-P2 insofar as they encourage and enable the development of renewable energy and thus will help submitter achieve its sustainability and climate change goals.<br><br>[See paragraph 4.25 to 4.29 of original submission for further detail.]   | Retain REG-P2 (Providing for renewable electricity generation activities) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P3 | Meridian Energy Limited                  | 228.37            | Support         | Considers provision for renewable electricity generation investigation activities in all areas is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.  | Retain Policy REG-P3 (Renewable electricity generation investigation activities) as notified.  |

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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P3 | Royal Forest and Bird Protection Society                | 345.101           | Oppose in part | In point 1, supports the intent to avoid overlays and other sensitive areas in this policy, the Plan has not identified all areas that may be sensitive and require protection under higher order document. For example other areas of natural character in the coastal environment are required to be protected under policy 13 NZCPS. Further, residential SNAs are currently not protected. The direction to enable these activities where effects are minimised is contrary to the requirement in s5(2)(c) that effects are avoided, remedied or mitigated. Effects might be 'minimised' but still be very significant. Amend to include more appropriate direction to create the least amount of effects, while also avoiding, remedying or mitigating. 'Enable' should be amended to 'consider enabling'.   | Amend REG-P3 (Renewable electricity generation investigation activities):<br><br>1. Replace "enable" with "consider enabling". Amend to include direction to create least amount of effects while also avoiding, remedying, or mitigating remaining effects.                            |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P3 | Royal Forest and Bird Protection Society                | 345.102           | Oppose in part | In point 2, generally supports the requirement to avoid significant adverse effects in overlays and other sensitive areas. However, this does not give effect to areas that contain NZCPS policy 11(a) matters. In that case, all adverse effects must be avoided. Amend this policy to give effect to NZCPS.<br><br>'Allow' should be changed to 'consider allowing'. Delete 'identified' for the reasons given elsewhere in this submission.<br><br>The list of ways to avoid, remedy or mitigate effects is not appropriate to ensure that natural values are protected. For example, ii. says nothing about the circumstances in which effects may need to be avoided in order to protect the values present. It starts from a presumption that there will not be avoidance, and that the adverse effects will be acceptable, where they are kept as small as possible. In our view it is not appropriate to include an exhaustive list of how to deal with effects in sensitive areas – unless that list includes direction that nonsignificant effects may need to be avoided altogether. | Amend REG-P3 (Renewable electricity generation investigation activities):<br><br>2. Replace "allow" with "consider allowing". Delete "identified" in point b. Amend to give effect to S11(a) of NZ Coastal Policy Statement. Remove list of ways to avoid, remedy, or mitigate effects. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P3 | Wellington International Airport Ltd                    | 406.176           | Oppose in part | Considers that the policy should expressly state which overlays apply to the site.<br><br>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.   | Opposes REG-P3 (Renewable electricity generation investigation activities) and seeks amendment.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P3 | Wellington International Airport Ltd                    | 406.177           | Amend          | Considers that the policy should expressly state which overlays apply to the site.<br><br>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.   | Seeks that REG-P3 (Renewable electricity generation investigation activities) is amended to refer to the specific overlays of relevance.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P4 | Victoria University of Wellington Students' Association | 123.19            | Support        | Supports REG-P4 in its entirety.  | Retain REG-P4 (Small scale renewable electricity generation outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P4 | Meridian Energy Limited                                 | 228.38            | Support        | Considers provision for all scales of renewable electricity in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives.   | Retain Policy REG-P4 (Small scale renewable electricity generation outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.   |

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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P4 | Royal Forest and Bird Protection Society                | 345.103           | Oppose in part | Supports intent to avoid overlays and other sensitive areas in this policy, but considers the Plan has not identified all areas that may be sensitive and require protection under higher order document. For example other areas of natural character in the coastal environment are required to be protected under policy 13 NZCPS. Further, residential SNAs are currently not protected. Change 'enable' to 'consider enabling'.  | Amend REG-P4 (Small scale renewable electricity generation outside Overlays, high coastal natural character areas, and coastal and riparian margins) to identify areas that may be sensitive and require protection under higher order documents. Change "enable" to "consider enabling".   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P4 | Wellington International Airport Ltd                    | 406.178           | Oppose in part | Considers that the policy should expressly state which overlays apply to the site.<br><br>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.   | Opposes REG-P4 (Small scale renewable electricity generation outside Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P4 | Wellington International Airport Ltd                    | 406.179           | Amend          | Considers that the policy should expressly state which overlays apply to the site.<br><br>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.   | Seeks that REG-P4 (Small scale renewable electricity generation outside Overlays, high coastal natural character areas, and coastal and riparian margins) is amended to refer to the specific overlays of relevance.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Victoria University of Wellington Students' Association | 123.20            | Support        | Supports REG-P5 in its entirety.  | Retain REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Meridian Energy Limited                                 | 228.39            | Support        | Considers provision for all scales of renewable electricity in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives.   | Retain Policy REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Royal Forest and Bird Protection Society                | 345.104           | Oppose in part | Delete references to 'operational need', and 'identified' values. Change 'allow' to 'only allow' or 'consider allowing'.<br>Point 3 - Considers the direction to enable these activities where effects are minimised is contrary to the requirement in s5(2)(c) that effects are avoided, remedied or mitigated. Effects might be 'minimised' but still be very significant. Amend to include more appropriate direction to create the least amount of effects, while also avoiding, remedying or mitigating. | Amend REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins):<br><br><u>Consider Allowing</u> small scale renewable electricity generation activities within Overlays, high coastal natural character areas, or coastal margins and riparian margins within the coastal environment, where:<br>...<br>3. If located within an area identified as ridgelines and hilltops, any adverse effects on visual amenity and landscape values are minimised; <u>[Add direction to create least amount of effects while avoiding, remedying, or mitigating]</u> |

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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Royal Forest and Bird Protection Society | 345.105           | Oppose in part | Delete references to 'operational need', and 'identified' values. Change 'allow' to 'only allow' or 'consider allowing'.<br>Point 4 - Amend to include the same level of protection that SALs receive under the ONFL chapter. Amend a. to 'The activity is of a scale and nature ...'. Amend 'having regard to' the NFL policies to 'while applying'.  | Amend REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins):<br><br><u>Consider Allowing</u> small scale renewable electricity generation activities within Overlays, high coastal natural character areas, or coastal margins and riparian margins within the coastal environment, where:<br>...<br>4. If located within an area identified in SCHED11 - Special Amenity Landscapes: <u>[Amend to include same level of protection as SALs receive under NFL chapter]</u><br>a. The activity is of a scale <u>and nature</u> that maintains or restores the identified values, including restoration and conservation activities;<br>b. Outside the coastal environment any adverse effects are avoided, remedied or mitigated;<br>c. Within the coastal environment, any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated; and<br>d. There is a functional need <del>or operational need</del> for the activity to be undertaken inside a Special Amenity Landscape and there are no reasonably practical alternative locations outside of these areas;<br>while <del>having regard to</del> <u>applying</u> the matters in NFL-P3 and NFL-P4;   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Royal Forest and Bird Protection Society | 345.106           | Oppose in part | Delete references to 'operational need', and 'identified' values. Change 'allow' to 'only allow' or 'consider allowing'.<br>Point 5 - Amend to include the same level of protection that ONFLs receive under the ONFL chapter. Amend a. to 'The activity is of a scale and nature ...'. Amend 'having regard to' the NFL policies to 'while applying'. | Amend REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins):<br><br>Allow small scale renewable electricity generation activities within Overlays, high coastal natural character areas, or coastal margins and riparian margins within the coastal environment, where:<br>...<br>5. If located within an area identified in SCHED10 - Outstanding Natural Features and Landscapes: <u>[Amend to include same level of protection as ONFLs receive under NFL chapter]</u><br>a. The activity is of a scale <u>and nature</u> that maintains or restores the identified values, including restoration and conservation activities and other adverse effects on these matters; [Clarify what is meant by restoration and conservation activities, and/or delete as it introduces different standard to ECO-P2]<br>b. Outside the coastal environment significant adverse effects on the identified values are avoided and any other adverse effects on the identified values are avoided, remedied or mitigated;<br>c. Within the coastal environment any adverse effects on the identified values are avoided; and<br>d. There is a functional need <del>or operational need</del> for the activity to be undertaken inside an Outstanding Natural Feature or Landscape and there are no reasonably practical alternative locations outside of these areas;<br>while <del>having regard to</del> <u>applying</u> the matters in NFL-P5 and NFL-P6; <u>[Correct references?]</u> |

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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Royal Forest and Bird Protection Society | 345.107           | Oppose in part | <p>Delete references to 'operational need', and 'identified' values. Change 'allow' to 'only allow' or 'consider allowing'.</p> <p>Point 6 - Amend to include the same level of protection that SNAs receive under the ECO chapter. Include the deleted SCHED 9. Amend a. to 'The activity is of a scale and nature ...' Clarify what is meant by 'including restoration and conservation activities'. Consider deleting as this introduces potentially different standard to ECO P2. Make the clause 'and other effects on these matters...' apply to both i and ii. Delete "operational need". Amend 'while having regard to' ECO policies, to 'while applying'. Notes the references appear incorrect.</p> | <p>Amend REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins):</p> <p><u>Consider Allowing</u> small scale renewable electricity generation activities within Overlays, high coastal natural character areas, or coastal margins and riparian margins within the coastal environment, where:</p> <p>...</p> <p>6. If located within an area <del>identified in SCHED8 – Significant Natural Areas</del> of natural character in the coastal area: [Amend to include the same level of protection that SNAs receive under the ECO chapter, include reference to SCHED9]</p> <p>a. The activity is of a scale that maintains or restores the identified values, including restoration and conservation activities; [Clarify restoration and conservation activities]</p> <p>b. Outside the coastal environment, significant adverse effects on the identified values are avoided and any other adverse effects on the identified values are avoided, remedied or mitigated;</p> <p>c. Within the coastal environment:</p> <p>i. Adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010 are avoided <u>and other adverse effects on these matters are avoided, remedied or mitigated</u>; and</p> <p>ii. Significant adverse effects on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010 are avoided, and other adverse effects on these matters are avoided, remedied or mitigated; and</p> <p>d. There is a functional need <del>or operational need</del> for the activity to be undertaken inside a Significant Natural Area and there are no reasonably practical alternative locations outside of these areas;</p> <p>while <del>having regard to</del> <u>applying</u> the matters in ECO-P2, ECO-P7;</p> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Royal Forest and Bird Protection Society | 345.108           | Oppose in part | <p>Delete references to 'operational need', and 'identified' values. Change 'allow' to 'only allow' or 'consider allowing'.</p> <p>Point 7 - Apply policy to all areas of natural character in the coastal area. Delete "operational need". Amend "while having regard to" CE policies to "while applying.</p>  | <p>Amend REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins):</p> <p><u>Consider Allowing</u> small scale renewable electricity generation activities within Overlays, high coastal natural character areas, or coastal margins and riparian margins within the coastal environment, where:</p> <p>...</p> <p>7. If located within an area identified in SCHED12 – High Coastal Natural Character Areas, or a coastal margin or riparian margin within the coastal environment:</p> <p>a. The activity is of a scale that maintains or restores the identified values, including restoration and conservation activities;</p> <p>b. Any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated;</p> <p>c. The design and location of the activity is subordinate to and does not compromise the identified characteristics and values of the high coastal natural character area, or the coastal or riparian margin within the coastal environment; and</p> <p>d. There is a functional need <del>or operational need</del> for the activity to be undertaken inside a high coastal natural character area or within coastal or riparian margins within the coastal environment, and there are no reasonably practical alternative locations outside of these areas;</p> <p>while <del>having regard to</del> <u>applying</u> the matters in CE-P5, CE-P6 and CE-P7;...</p>   |

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|---|---|-------------------|----------------|--|--|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Wellington International Airport Ltd                    | 406.180           | Oppose in part | <p>Considers that the policy should expressly state which overlays apply to the site.</p> <p>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.</p> | Opposes REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P5 | Wellington International Airport Ltd                    | 406.181           | Amend          | <p>Considers that the policy should expressly state which overlays apply to the site.</p> <p>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.</p> | Seeks that REG-P5 (Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins) is amended to refer to the specific overlays of relevance.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | Victoria University of Wellington Students' Association | 123.21            | Support        | Supports REG-P6 in its entirety.   | Retain REG-P6 (Community scale renewable electricity generation activities in the General Rural Zone, General Industrial and Airport Zones, outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | Meridian Energy Limited                                 | 228.40            | Support        | Considers provision for all scales of renewable electricity in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives.  | Retain Policy REG-P6 (Community scale renewable electricity generation activities in the General Rural Zone, General Industrial and Airport Zones, outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | Royal Forest and Bird Protection Society                | 345.109           | Support        | Supports the policy as long as areas of natural character in the coastal environment are appropriately protected.  | Retain REG-P6 (Community scale generation in certain zones outside sensitive areas) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | WCC Environmental Reference Group                       | 377.40            | Support        | Supportive of the policy due to its ambitious wording of "Provide" that aligns with the spirit of the Wellington regions long term sustainability goals and the amended REG-01 by demonstrating commitment to the development of Community Scale.  | Retain REG-P6 (Community scale renewable electricity generation activities in the General Rural Zone...) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | Ministry of Education                                   | 400.26            | Support        | Supports REG-P6 as having particular regard to the location of the renewable electricity generation activity from existing sensitive activities (including educational facilities) and whether there is adequate separation and buffering provided to manage any effects on educational facilities and reduce reverse sensitivity effects.   | Retain REG-P6 (Community scale renewable electricity generation activities in the General Rural Zone, General Industrial and Airport Zones, outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | Wellington International Airport Ltd                    | 406.182           | Oppose in part | <p>Considers that the policy should expressly state which overlays apply to the site.</p> <p>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.</p> | Opposes REG-P6 (Community scale renewable electricity generation activities in the General Rural Zone, General Industrial and Airport Zones, outside Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P6 | Wellington International Airport Ltd                    | 406.183           | Amend          | <p>Considers that the policy should expressly state which overlays apply to the site.</p> <p>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation.</p> | Seeks that REG-P6 (Community scale renewable electricity generation activities in the General Rural Zone, General Industrial and Airport Zones, outside Overlays, high coastal natural character areas, and coastal and riparian margins) is amended to refer to the specific overlays of relevance. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Victoria University of Wellington Students' Association | 123.22            | Support        | Supports REG-P7 in its entirety.   | Retain REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) as notified.  |



| Sub-part / Chapter / Provision  | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission  | Decisions Requested   |
|---|--|-------------------|-----------------|--|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Meridian Energy Limited                  | 228.41            | Support in part | Considers provision for all scales of renewable electricity generation in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives. For consistency with Policy REG-P6, the words 'Only allow' should be amended to 'Provide for'. The list of circumstances given in the policy defines the situations where community-scale renewable electricity generation will be allowed. Considers the expression 'energy' should be replaced with 'electricity' which is the Plan's defined term. | Retain Policy REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and overlays) with amendment.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Meridian Energy Limited                  | 228.42            | Amend           | Considers provision for all scales of renewable electricity generation in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives. For consistency with Policy REG-P6, the words 'Only allow' should be amended to 'Provide for'. The list of circumstances given in the policy defines the situations where community-scale renewable electricity generation will be allowed. Considers the expression 'energy' should be replaced with 'electricity' which is the Plan's defined term. | Amend Policy REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and overlays) as follows (or similar):<br><br>Community-scale renewable electricity generation activities within other zones, locations and Overlays<br><br><del>Only allow</del> Provide for community-scale renewable <del>energy</del> electricity generation activities in other zones, locations and Overlays where: ...  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.110           | Support in part | Point 5 - Amend to include the same level of protection that SNAs receive under the ECO chapter. Amend 'while having regard to' ECO policies to 'while applying'. Check ECO policies are correctly referenced.   | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>5. If located on a site identified in SCHED8 - Significant Natural Areas: <u>Amend to include the same level of protection that SNAs receive under the ECO chapter, check ECO policy referencing</u><br>a. Outside the coastal environment, significant adverse effects on the identified values are avoided and any other adverse effects on the identified values are avoided, remedied or mitigated;<br>b. Within the coastal environment:<br>i. Adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010 are avoided; and<br>ii. Significant adverse effects on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010 are avoided, and other adverse effects on these matters are avoided, remedied or mitigated;<br><del>while having regard to</del> <u>applying</u> the matters in ECO-P2, ECO-P3, ECO-P4 and ECO-P7; |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.111           | Support in part | Point 6 - Amend to apply to all areas of natural character in the coastal environment. Amend 'while having regard to' NFL policies, to 'while applying'. Amend a. to 'The activity is of a scale and nature ...'   | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>6. If located within <del>an area identified in SCHED12 - High Coastal Natural Character Areas, or a coastal margin or riparian margin within the coastal environment, an area of natural character in the coastal environment</del> any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated, <del>while having regard to</del> <u>applying</u> the matters in CE-P5, CE-P6 and CE-P7, and:<br>a. The activity is of a scale <u>and nature</u> that maintains or restores the identified values, including restoration and conservation activities; and<br>b. The design and location of the activity is subordinate to and does not compromise the identified characteristics and values;  |

| Sub-part / Chapter / Provision  | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested   |
|---|--|-------------------|-----------------|---|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.112           | Support in part | Point 7 - Amend c. to 'The activity is of a scale and nature ...'. Amend 'while having regard to' NFL policies, to 'while applying'.  | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>7. If located within an area identified in SCHED10 - Outstanding Natural Features and Landscapes:<br>a. Outside the coastal environment, significant adverse effects on the identified values are avoided and any other adverse effects on the identified values are avoided, remedied or mitigated;<br>b. Within the coastal environment, any adverse effects on the identified values are avoided;<br>c. The activity is of a scale <u>and nature</u> that maintains or restores the identified values, including restoration and conservation activities; and<br>d. The design and location of the activity is subordinate to and does not compromise the identified characteristics and values;<br>while having regard to applying the matters in NFL-P5 and NFL-P6; |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.113           | Support in part | Point 8 - Amend 'while having regard to' NFL policies, to 'while applying'  | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>8. If located on a site identified in SCHED11 - Special Amenity Landscapes:<br>a. Outside the coastal environment, any adverse effects are avoided, remedied or mitigated; and<br>b. Within the coastal environment, any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated;<br>while having regard to <u>applying</u> the matters in NFL-P2 and NFL-P4.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.114           | Support in part | Point 9 - Considers the direction to allow these activities where effects are minimised is contrary to the requirement in s5(2)(c) that effects are avoided, remedied or mitigated. Effects might be 'minimised' but still be very significant. Amend to include more appropriate direction to create the least amount of effects, while also avoiding, remedying or mitigating.  | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>9. If located within an area identified as ridgelines and hilltops, any adverse effects on visual amenity and landscape values are minimised; <u>[Amend to include more appropriate direction to create the least amount of effects, while also avoiding, remedying or mitigating]</u>   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.115           | Support in part | Point 11 - Considers it is not clear how this paragraph apply in relation to the previous paragraphs of this policy. Amend to clarify.  | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>11. There is an operational need or functional need for the identified location and there are no reasonable alternatives; and <u>[clarify how this point applies to previous points]</u>   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Royal Forest and Bird Protection Society | 345.116           | Support in part | Points 12 - Considers it is not clear how this paragraph apply in relation to the previous paragraphs of this policy. Amend to clarify. In terms of 12.k., opposes term 'adaptive management'. Opposes the phrase 'which may benefit the local environment or the community affected' as this introduces a different consideration to the offsetting and compensation principles in APP2 and APP3.  | Amend REG-P7 (Community scale generation in other zones and within sensitive areas):<br>...<br>12. Adverse effects are avoided, remedied or mitigated having regard to... <u>[clarify how this point applies to previous points]</u><br>k. Any <del>adaptive management</del> , offsetting measures or environmental compensation <del>which may benefit the local environment or the community affected.</del>   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | 350 Wellington                           | 396.2             | Amend           | Considers that the wording in REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) should be amended to be more permissive and less restrictive, in line with other REG policies, regarding community-scale generation projects outside of the General Rural Zone.<br><br>The wording in REG-P7, "Only allow community-scale renewable energy generation activities", currently means that approval for these projects must prove why they should be allowed as opposed to being evaluated for if there is cause to disallow them or require amendments. This is in contrast with wording in the majority of REG policies which is to "provide for" various scale renewable energy generation projects. REG-P7 projects should have wording to "Provide for" them, unless through the consenting process it is found that they are at odds with the restrictions outlined. | Amend REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) as follows:<br><br><del>Only allow</del> Provide for community-scale renewable energy generation activities in other zones, locations and Overlays where:<br>...<br>...   |

| Sub-part / Chapter / Provision  | Submitter Name  | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested   |
|---|---|-------------------|-----------------|---|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | 350 Wellington  | 396.3             | Support in part | Support the restrictions in REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) as outlined to protect natural and cultural environments from adverse affects of such projects.   | Retain REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) as notified, subject to wording changes suggested by this submission.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Ministry of Education                                   | 400.27            | Support         | Supports REG-P7 as having particular regard to the location of the renewable electricity generation activity from existing sensitive activities (including educational facilities) and whether there is adequate separation and buffering provided to manage any effects on educational facilities and reduce reverse sensitivity effects.  | Retain REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Wellington International Airport Ltd                    | 406.184           | Oppose in part  | Considers that the policy should expressly state which overlays apply to the site.<br><br>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation. | Opposes REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) and seeks amendment.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P7 | Wellington International Airport Ltd                    | 406.185           | Amend           | Considers that the policy should expressly state which overlays apply to the site.<br><br>Based on the subparagraphs, it appears to be confined to overlays relating to the natural environment, historic and cultural values and natural hazards. There are, however, a number of other overlays within the plan that are captured by the broad use of the term "overlay" which are in no way relevant to the establishment of renewable electricity generation. | Seeks that REG-P7 (Community-scale renewable electricity generation activities within other zones, locations and Overlays) is amended to refer to the specific overlays of relevance.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Victoria University of Wellington Students' Association | 123.23            | Support         | Supports REG-P8 in its entirety.<br><br>Considers that it is important to ensure the maintenance and improvement of our renewable energy infrastructure.  | Retain REG-P8 (Upgrading existing large scale renewable electricity generation activities) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | M&P Makara Family Trust                                 | 159.3             | Amend           | Considers that REG-S11 (Upgrading of existing large scale renewable electricity generation activities) allows only a 5m alteration of position it seems that many factors provided for in 3 have already been considered and dealt with (as already consented), but this may be explained by clarifying the relationship between REG-P8 and REG-P11.  | Clarify the relationship between REG-P8 (Upgrading existing large scale renewable electricity generation activities) and REG-P11 (Upgrading existing renewable electricity generation activities and providing for technological advances).   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | M&P Makara Family Trust                                 | 159.4             | Amend           | Considers that as REG-S11 (Upgrading of existing large scale renewable electricity generation activities) provides a definition of "Upgrade" which covers replacement, then use of the word "replacement" is unnecessary.   | Amend REG-P8 (Upgrading existing large scale renewable electricity generation activities) as follows:<br><br>Provide for the upgrading of existing large scale renewable electricity generation activities, including replacing or upgrading wind turbines and their support structures and ancillary facilities within existing wind farms, where the activity:<br>... |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | M&P Makara Family Trust                                 | 159.5             | Amend           | Considers that it appears that "adverse effects" on neighbouring properties and the community has been left out, while only management or benefits to the "affected community" may be considered. Specific inclusion of adverse effects on neighbours and/or the local community needs to be included.  | Amend REG-P8 (Upgrading existing large scale renewable electricity generation activities) as follows:<br><br>3. ...<br>a. Landscape, visual or amenity values of the site and surrounding area <u>including adjoining sites and the local community</u> , having regard to:<br>...  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Meridian Energy Limited                                 | 228.43            | Support in part | Supports in principle the approach of Policy REG-P8 in providing for upgrading.<br>Considers that in any assessment of the effects of upgrading, it is important that the existing environment (as modified by the presence of the existing renewable electricity generation activity) is the baseline for assessment.  | Retain Policy REG-P8 (Upgrading existing large scale renewable electricity generation activities) with amendment.   |

| Sub-part / Chapter / Provision  | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission  | Decisions Requested  |
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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Meridian Energy Limited                  | 228.44            | Amend           | Supports in principle the approach of Policy REG-P8 in providing for upgrading. Considers that in any assessment of the effects of upgrading, it is important that the existing environment (as modified by the presence of the existing renewable electricity generation activity) is the baseline for assessment.  | Amend Policy REG-P8 (Upgrading existing large scale renewable electricity generation activities) as follows (or similar):<br><br>Upgrading existing large scale renewable electricity generation activities<br><br>Provide for the upgrading of existing large scale renewable electricity generation activities, including replacing or upgrading wind turbines and their support structures and ancillary facilities within existing wind farms, where the activity:<br><br>1. Avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on the identified values of any Overlay or any adjacent Overlay, high coastal natural character area, or coastal margin or riparian margin in the coastal environment, <u>recognising the character of the existing environment</u> ;<br>2. Has a functional need or operational need for its location; and<br>3. Minimises adverse effects, including adverse cumulative effects, on: ... |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Meridian Energy Limited                  | 228.45            | Support in part | Supports the policy with relief sought by the submitter and considers it can be combined with Policy REG-P11.  | Seeks that police REG-P8 (Upgrading existing large scale renewable electricity generation activities) and REG-P11 (Upgrading existing renewable electricity generation activities and providing for technological advances) are combined, ensuring that all of the matters listed in each is retained.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Royal Forest and Bird Protection Society | 345.117           | Oppose in part  | Amend 'provide for' to 'consider providing for'. Amend to ensure that this policy provides the same level of protection to natural and coastal values as is given by the relevant Natural Environment Values and Coastal Environment chapters.<br>Point 1 - Support. However this needs amendment to give effect to the requirements of NZCPS policy 11(a) and 15(a).  | Amend REG-P8 (Upgrading existing large scale generation activities):<br><br><u>Consider providing</u> for the upgrading of existing large scale renewable electricity generation activities, including replacing or upgrading wind turbines and their support structures and ancillary facilities within existing wind farms, where the activity: <u>[Amend to make policy provide same level of protection to natural and coastal values as Natural Environment Values and Coastal Environment chapters]</u><br>1. Avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on the identified values of any Overlay or any adjacent Overlay, high coastal natural character area, or coastal margin or riparian margin in the coastal environment; <u>[Amend to give effect to the requirements of NZCPS policy 11(a) and 15(a).]</u>   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Royal Forest and Bird Protection Society | 345.118           | Oppose in part  | Amend to ensure that this policy provides the same level of protection to natural and coastal values as is given by the relevant Natural Environment Values and Coastal Environment chapters.<br>Point 2 - Delete 'operational need'   | Amend REG-P8 (Upgrading existing large scale generation activities):<br>...<br>2. Has a functional need <del>or operational need</del> for its location; and   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Royal Forest and Bird Protection Society | 345.119           | Oppose in part  | Amend to ensure that this policy provides the same level of protection to natural and coastal values as is given by the relevant Natural Environment Values and Coastal Environment chapters.<br>Point 3 - The direction to provide for upgrading large scale generation activities where effects are minimised is contrary to the requirement in s5(2)(c) that effects are avoided, remedied or mitigated. Effects might be 'minimised' but still be very significant. Amend to include more appropriate direction to create the least amount of effects, while also avoiding, remedying or mitigating. Oppose 'adaptive management'. Also oppose the phrase 'which may benefit the local environment or the community affected' as this introduces a different consideration to the offsetting and compensation principles in APP2 and APP3. | Amend REG-P8 (Upgrading existing large scale generation activities):<br>...<br>3. Minimises adverse effects, including adverse cumulative effects, on: <u>[Amend to include more direction to create the least amount of effects, while also avoiding, remedying or mitigating]</u><br>...<br>while having regard to any <del>adaptive management</del> , offsetting measures or environmental compensation <del>which may benefit the local environment or affected community.</del>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P8 | Ministry of Education                    | 400.28            | Support         | Supports REG-P8 as having particular regard to landscape and visual effects and consideration of the separation of the proposed upgrades and existing sensitive activities.  | Retain REG-P8 (Upgrading existing large scale renewable electricity generation activities) as notified.  |

| Sub-part / Chapter / Provision  | Submitter Name  | Sub No / Point No | Position | Summary of Submission   | Decisions Requested  |
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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9 | Victoria University of Wellington Students' Association | 123.24            | Support  | Supports REG-P9 in its entirety.  | Retain REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9 | Meridian Energy Limited                                 | 228.46            | Oppose   | Opposes Policy REG-P9 (New large scale renewable electricity generation activities in the General Rural zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment. | Opposes Policy REG-P9 (New large scale renewable electricity generation activities in the General Rural zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9 | Meridian Energy Limited                                 | 228.47            | Amend    | Opposes Policy REG-P9 (New large scale renewable electricity generation activities in the General Rural zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment. | Amend Policy REG-P9 (New large scale renewable electricity generation activities in the General Rural zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) as follows (or similar):<br><br>New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins<br><br>Provide for new large scale renewable electricity generation activities in the General Rural Zone, including within the coastal environment, where:<br><br><del>1. They are located outside:</del><br><br><del>a. Overlays (other than ridgelines and hilltops, and low and medium hazard areas within the Hazard Overlays);</del><br><del>b. High coastal natural character areas identified in SCHED12; and</del><br><del>c. Coastal margins and riparian margins within the coastal environment;</del><br><br><del>2. 1. They have an operational need or functional need to locate where the renewable energy resources are available;</del><br><br>...   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9 | Meridian Energy Limited                                 | 228.48            | Amend    | Opposes Policy REG-P9 (New large scale renewable electricity generation activities in the General Rural zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) and seeks amendment. | Delete Policy REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) New large scale renewable electricity generation activities in the General Rural zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) with the amended Policy REG-P10 as follows:<br><br><u>New Large scale renewable electricity generation activities in the General Rural</u><br><br><u>Enable new large scale renewable electricity generation activities in the General Rural Zone including within the coastal environment, areas of Very High and High Coastal Natural Character where:</u><br><br><u>1. significant adverse effects on coastal natural character and the values of Overlay areas and riparian margins are avoided; and</u><br><u>2. other adverse effects on coastal character, the values of Overlay areas and riparian margins are minimised, recognising the functional needs and operational needs of renewable electricity generation activities.</u> |

| Sub-part / Chapter / Provision   | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission  | Decisions Requested   |
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| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9  | Royal Forest and Bird Protection Society | 345.120           | Support in part | Support the intent to avoid sensitive areas. Amend 'provide for' to 'consider providing for'. Other areas of natural character in the coastal environment need to be included. Point 2 - Delete 'operational need'.  | Amend REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins):<br><br><u>Consider providing for new large scale renewable electricity generation activities in the General Rural Zone, including within the coastal environment, where: [Amend to include other areas of natural character in the coastal environment]</u><br>...<br>2. They have an operational need or functional need to locate where the renewable energy resources are available;                                      |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9  | Royal Forest and Bird Protection Society | 345.121           | Support in part | Support the intent to avoid sensitive areas. Other areas of natural character in the coastal environment need to be included. Point 4 - Needs amendment to give effect to NZCPS policy 11(a) and 15(a)   | Amend REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins):<br>...<br>4. They avoid any significant adverse effects and avoid, remedy or mitigate any other adverse effect on the identified values and qualities of any adjacent Overlay or high coastal natural character area; <u>[Amend to give effect to NZCPS policy 11(a) and 15(a)]</u>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9  | Royal Forest and Bird Protection Society | 345.122           | Support in part | Support the intent to avoid sensitive areas. Other areas of natural character in the coastal environment need to be included. Point 5 - The direction to provide for large scale generation activities where effects are minimised is contrary to the requirement in s5(2)(c) that effects are avoided, remedied or mitigated. Effects might be 'minimised' but still be very significant. Amend to include more appropriate direction to create the least amount of effects, while also avoiding, remedying or mitigating. Oppose 'adaptive management'. Oppose the phrase 'which may benefit the local environment or the community affected' as this introduces a different consideration to the offsetting and compensation principles in APP2 and APP3. | Amend REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins):<br>...<br>5. They minimise any adverse effects, including adverse cumulative effects, on: <u>[Amend to provide more direction to create the least amount of effects, while also avoiding, remedying or mitigating]</u><br>...<br>while having regard to any <del>adaptive management</del> , offsetting measures or environmental compensation <del>which may benefit the local environment or the community affected.</del> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9  | WCC Environmental Reference Group        | 377.41            | Support         | Supportive of the policy due to its commitment to the development of large scale renewable energy infrastructure that aligns with the Wellington region's long term sustainability goals and supports energy independence and security alongside the transition to net zero.   | Retain REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays...) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P9  | Ministry of Education                    | 400.29            | Support         | Supports REG-P9 as having particular regard to landscape and visual effects and consideration of the separation of renewable electricity generation activities from existing sensitive activities.   | Retain REG-P9 (New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P10 | Meridian Energy Limited                  | 228.49            | Oppose          | Seeks discretionary activity provision for large-scale renewable electricity generation activities in all parts of the General Rural Zone.   | Delete Policy REG-P10 (New large-scale renewable electricity generation activities in other zones, locations and Overlays) in its entirety.   |

| Sub-part / Chapter / Provision   | Submitter Name  | Sub No / Point No | Position        | Summary of Submission  | Decisions Requested   |
|--|---|-------------------|-----------------|--|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P10 | Meridian Energy Limited                                 | 228.50            | Amend           | Seeks discretionary activity provision for large-scale renewable electricity generation activities in all parts of the General Rural Zone.   | <p>Replace Policy REG-P10 (New large-scale renewable electricity generation activities in other zones, locations and Overlays) with an enabling policy as follows (or similar wording to achieve the outcome of provision for large scale renewable electricity activities throughout the General Rural Zone):</p> <p><u>New Large scale renewable electricity generation activities in the General Rural</u></p> <p><u>Enable new large scale renewable electricity generation activities in the General Rural Zone including within the coastal environment, areas of Very High and High Coastal Natural Character where:</u></p> <p><u>1. significant adverse effects on coastal natural character and the values of Overlay areas and riparian margins are avoided; and</u></p> <p><u>2. other adverse effects on coastal character, the values of Overlay areas and riparian margins are minimised, recognising the functional needs and operational needs of renewable electricity generation activities.</u></p> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P10 | Royal Forest and Bird Protection Society                | 345.123           | Support         | Supports the policy.   | Retain REG-P10 (New large-scale renewable electricity generation activities in other zones, locations and Overlays) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P11 | Victoria University of Wellington Students' Association | 123.25            | Support         | Supports REG-P11 in its entirety.<br><br>Considers that it is important to ensure the maintenance and improvement of our renewable energy infrastructure.  | Retain REG-P11 (Upgrading existing renewable electricity generation activities and providing for technological advances) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P11 | M&P Makara Family Trust                                 | 159.6             | Amend           | Considers that it is unclear what the relationship between REG-P11 and REG-P8 is.  | Clarify the relationship between REG-P8 (Upgrading existing large scale renewable electricity generation activities) and REG-P11 (Upgrading existing renewable electricity generation activities and providing for technological advances).   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P11 | M&P Makara Family Trust                                 | 159.7             | Not specified   | Considers that it is unclear what the difference is between "repowering" and "upgrading", and if different and REG-S11 is not relevant, this needs explanation and defining.                     | Seeks that if "repowering" is different to "upgrading" and if REG-S11 (Upgrading of existing large scale renewable electricity generation activities) is not considered relevant, new considerations need to be provided.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P11 | Meridian Energy Limited                                 | 228.51            | Support in part | Supports the policy with relief sought by the submitter and considers it can be combined with Policy REG-P8.   | Seeks that police REG-P8 (Upgrading existing large scale renewable electricity generation activities) and REG-P11 (Upgrading existing renewable electricity generation activities and providing for technological advances) are combined, ensuring that all of the matters listed in each is retained.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P11 | Royal Forest and Bird Protection Society                | 345.124           | Support in part | Include reference to the need to still manage adverse effects on natural values, even where those benefits are present.  | Amend REG-P11 (Upgrading existing renewable electricity generation activities and providing for technological advances) to refer to the need to manage adverse effects on natural values even where those benefits are present.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P12 | Meridian Energy Limited                                 | 228.52            | Support         | Considers that policy REG-P12 (Reverse sensitivity effects) is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.  | Retain Policy REG-P12 (Reverse sensitivity effects) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P12 | Royal Forest and Bird Protection Society                | 345.125           | Support         | Supports the policy.   | Retain REG-P12 (Reverse sensitivity effects) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P13 | Royal Forest and Bird Protection Society                | 345.126           | Support         | Supports the policy.   | Retain REG-P13 (Energy efficient subdivision and development) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P13 | Greater Wellington Regional Council                     | 351.104           | Amend           | Considers the District Plan going as far as it can to promote energy efficient design of buildings and developments, including alterations to have regard to Policy 11 of Proposed RPS Change 1. | Seeks to ensure the renewable electricity generation and subdivision provisions have regard to Policy 11 of Proposed RPS Change 1 such that the District Plan goes as far as it can to promote energy efficient design of buildings and developments and enable renewable energy generation. This could also include provisions in the zones chapters.  |

| Sub-part / Chapter / Provision   | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested  |
|--|--|-------------------|-----------------|---|--|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-P13 | 350 Wellington                           | 396.4             | Amend           | <p>Considers that the wording in REG-P13 should be stronger in regards to encouraging responsible subdivision design enhancing sustainability of energy access in new subdivisions.</p> <p>Considers that the Council can take a stronger position towards incentivising responsible design of sustainable energy provision in subdivisions and other large scale development projects.</p>   | <p>Amend REG-P13 (Energy efficient subdivision and development) as follows:</p> <p><del>Encourage</del> <u>Incentivise</u> subdivision and development to be designed so that buildings can utilise energy and conservation measures, including by orientation to the sun and the use of energy efficient materials, to assist in improving energy efficiency and reducing energy consumption.</p> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R1  | Meridian Energy Limited                  | 228.53            | Not specified   | Meridian questions whether Rule REG-R1 (Maintenance and repair of existing renewable electricity generation activities) is necessary, because all existing renewable electricity generation activities (certainly existing large scale renewable electricity generation activities) required and have obtained consents and their conditions of consent provide for maintenance and repair. The Plan proposes that community scale and large scale renewable electricity generation activities will all require consents. It is reasonable to expect the terms and conditions of consent to address maintenance and repair. | Seeks Rule REG-R1 (Maintenance and repair of existing renewable electricity generation activities) is revisited for its necessity, particularly in relation to large scale renewable electricity generation activities.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R1  | Royal Forest and Bird Protection Society | 345.127           | Oppose in part  | REG-R1.1 - Query why the note refers to operation and removal, when this PA is about maintenance and repair.  | <p>Amend REG-R1 (Maintenance and repair of existing renewable electricity generation activities):</p> <p>REG-R1.1 - Clarify why reference to operation and removal is included in the note.</p>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R1  | Royal Forest and Bird Protection Society | 345.128           | Oppose in part  | REG-R1.2. PA within SNAS where S1 and 2 met. Oppose in part. Accept a level of vegetation removal for maintenance and repair. Point b - oppose 2m from each side of a road or track, as this allows for a very large amount of clearance. Amend to 1m. Support this being limited to existing facilities. Should be made clear that it is also limited to existing roads/tracks/fences. Refer to other submissions points regarding REG-S1 and S2 below. Considers it is not clear what policy provides the basis for maintenance and repair within SNAs. Consider including a new policy to provide this basis.            | <p>Amend REG-R1 (Maintenance and repair of existing renewable electricity generation activities):</p> <p>REG-R1.2 - Amend to allow a limited amount of vegetation removal as a Permitted activity.</p>   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R1  | Royal Forest and Bird Protection Society | 345.129           | Oppose in part  | REG-R1.3 - RDA within SNAs where S1 and 2 are not met. Oppose matters of discretion. The only reference is to P1 and P2, which are silent on the need to protect natural values. Amend the matters of discretion to refer to ECO policies. Add an exclusion from the RDA for policy 11(a) matters, and an accompanying non-complying rule.  | <p>Amend REG-R1 (Maintenance and repair of existing renewable electricity generation activities):</p> <p>REG-R1.3 - Amend matters of discretion to refer to relevant Ecosystems and Indigenous Biodiversity policies. Add an exclusion from the RDA for policy 11(a) matters, and an accompanying non-complying rule.</p>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R2  | Meridian Energy Limited                  | 228.54            | Support         | Meridian supports the permitted activity rule and standards for renewable electricity generation investigation activities and the standards proposed in REG-R2.1.   | Retain REG-R2.1 (Renewable electricity generation investigation activities) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R2  | Meridian Energy Limited                  | 228.55            | Support         | Meridian supports the restricted discretionary activity status and the proposed matters of discretion.  | Retain REG-R2.2 (Renewable electricity generation investigation activities) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R2  | Meridian Energy Limited                  | 228.56            | Support         | Supports the restricted discretionary activity status and the proposed matters of discretion relating to where standards are not met, and when within an overlay and scheduled area.  | Retain rule REG-R2.3 (Renewable electricity generation investigation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R2  | Royal Forest and Bird Protection Society | 345.130           | Oppose in part  | REG-R2.1 - Support in part. F&B has sought a general vegetation clearance rule to maintain biodiversity. We seek that compliance with vegetation removal rules is also required for this PA.  | <p>Amend REG-R2 (Renewable electricity generation investigation activities):</p> <p>REG-R2.1 - Add requirement for compliance with REG-S1 (Trimming and removal of vegetation) for Permitted activity status.</p>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R2  | Royal Forest and Bird Protection Society | 345.131           | Support in part | REG-R2.2 - Supported provided that REG-P1-3 are amended in the way sought by F&B submissions.   | Retain REG-R2.2 (Renewable electricity generation investigation activities) as notified, subject to other relief sought by submitter.  |



# Energy Infrastructure and Transport / Renewable Electricity Generation

| Sub-part / Chapter / Provision  | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested   |
|---|--|-------------------|-----------------|---|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R2 | Royal Forest and Bird Protection Society | 345.132           | Oppose in part  | REG-R2.3 - Support matters of discretion referring to the relevant Natural Environment Values and Coastal Environment chapter policies. Ensure ECO policies are referenced correctly. An exclusion from the RDA is needed for policy 11(a) and 15(a) matters, and an accompanying non-complying rule. Oppose the prohibition on notification.                                     | Amend REG-R2 (Renewable electricity generation investigation activities):<br><br>REG-R2.3 - Remove prohibition on notification. Add an exclusion for policy 11(a) and 15(a) matters, and add an accompanying non-complying rule.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R3 | Royal Forest and Bird Protection Society | 345.133           | Support in part | REG-R3.1 - Support  | Retain REG-R3.1 (Small scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R3 | Royal Forest and Bird Protection Society | 345.134           | Support in part | REG-R3.2 - Support, but matters of discretion need to refer to ECO and other overlay/CE chapter policies, given that the assessment criteria in the standards require consideration of ecological/biodiversity values, other natural values, and the values of adjacent overlays.   | Amend REG-R3 (Small scale renewable electricity generation activities):<br><br>REG-R3.2 - Amend matters of discretion to refer to Ecosystem and Indigenous Biodiversity, Natural Features and Landscapes, and Coastal Environment (and any other relevant overlay) policies.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R3 | Royal Forest and Bird Protection Society | 345.135           | Support in part | REG-R3.3 - Oppose matters of discretion. Seek instead a replication of the approach in REG-R2, which refers to the relevant policies in other chapters. An exclusion from the RDA is needed for policy 11(a) and 15(a) matters, and an accompanying non-complying rule.   | Amend REG-R3 (Small scale renewable electricity generation activities):<br><br>REG-R3.3 - Delete matters of discretion. Replace with matters of discretion listed in REG-R2.3. Add exclusion for policy 11(a) and 15(a) matters, and an accompanying non-complying rule.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R4 | Meridian Energy Limited                  | 228.57            | Support in part | Supports restricted discretionary activity provision for community scale and discretionary activity provision for large scale renewable electricity generation activities in all areas within the General Rural Zone (including within overlay areas).  | Retain Rule REG-R4 (Community scale renewable electricity generation activities) as notified  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R4 | Royal Forest and Bird Protection Society | 345.136           | Support in part | REG-R4.1 - General Rural Zone, General Industrial Zone, Airport Zone: RDA Support, but matters of discretion need to refer to ECO and other overlay/CE chapter policies, given that the assessment criteria in the standards require consideration of ecological/biodiversity values, other natural values, and the values of adjacent overlays.                                  | Amend REG-R4 (Community scale renewable electricity generation activities):<br><br>REG-R4.1 - Amend matters of discretion to refer to Ecosystem and Indigenous Biodiversity, Natural Features and Landscapes, and Coastal Environment (and any other relevant overlay) policies.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R4 | Royal Forest and Bird Protection Society | 345.137           | Support in part | REG-R4.2 - Above zones: Discretionary where RDA not met   | Retain REG-R4.2 (Community scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R4 | Royal Forest and Bird Protection Society | 345.138           | Support in part | REG-R4.3 - All other zones: Discretionary   | Retain REG-R4.3 (Community scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R4 | Royal Forest and Bird Protection Society | 345.139           | Support in part | REG-R4.4 - Sensitive areas: Discretionary. Support, provided that the policies in this chapter make clear that the policies from the natural values/CE chapters apply (as sought in above submissions). An exclusion from the discretionary rule is needed for policy 11(a) and 15(a) matters, and an accompanying non-complying rule.  | Amend REG-R4 (Community scale renewable electricity generation activities):<br><br>REG-R4.4 - Clarify that Ecosystem and Indigenous Biodiversity, Natural Features and Landscapes, and Coastal Environment (and any other relevant overlay) policies apply. Add exclusion for policy 11(a) and 15(a) matters, and an accompanying non-complying rule. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R5 | Meridian Energy Limited                  | 228.58            | Support in part | Supports in principle the restricted discretionary activity provision for upgrading of large scale renewable electricity generation activities and supports the matters of discretion.<br><br>Considers that proposed standards REG-S9 and REG-S10 address matters that are addressed already under the relevant standard (NZS6808:2010) which is also a requirement of the rule. | Retain REG-R5 (Upgrading of existing large scale renewable electricity generation activities) with amendments.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R5 | Meridian Energy Limited                  | 228.59            | Amend           | Supports in principle the restricted discretionary activity provision for upgrading of large scale renewable electricity generation activities and supports the matters of discretion.<br><br>Considers that proposed standards REG-S9 and REG-S10 address matters that are addressed already under the relevant standard (NZS6808:2010) which is also a requirement of the rule. | Amend Rule REG-R5.1 (Upgrading of existing large scale renewable electricity generation activities) by deleting the requirement to comply with Standards REG-S9 (Wind turbine noise limits) and REG-S10 (Wind turbine special audible characteristics (SAC's)).   |

| Sub-part / Chapter / Provision  | Submitter Name  | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested   |
|---|---|-------------------|-----------------|---|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R5 | Meridian Energy Limited                                 | 228.60            | Support         | Supports discretionary activity as the ultimate 'default' for renewable electricity generation activities that do not meet standards, including throughout the Rural General Zone and in all overlay areas.   | Retain REG-R5.2 (Upgrading of existing large scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R5 | Royal Forest and Bird Protection Society                | 345.140           | Support in part | REG-R5.1 - General Rural Zone and Brooklyn Turbine Zone RDA The matters of discretion need to refer to the ECO and other overlay/CE chapter policies, given that the assessment criteria in the standards require consideration of ecological/biodiversity values, other natural values, and the values of adjacent overlays.   | Amend REG-R5.1 (Upgrading of existing large scale renewable electricity generation activities):<br>Amend matters of discretion to refer to Ecosystem and Indigenous Biodiversity, Natural Features and Landscapes, and Coastal Environment (and any other relevant overlay) policies. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R5 | Royal Forest and Bird Protection Society                | 345.141           | Support in part | REG-R5.2 Accept provided that the policies in this chapter make clear that the policies from the natural values/CE chapters apply (as sought in above submissions).   | Retain REG-R5.2 (Upgrading of existing large scale renewable electricity generation activities) subject to relief sought on policies relating to the REG - Renewable Energy Generation chapter.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Victoria University of Wellington Students' Association | 123.26            | Support         | Supports REG-R6 not allowing the development of new large-scale renewable electricity generation activities within any sites, areas, items and/or features identified in SCHED7 - Sites and Areas of Significance to Māori.   | Retain REG-R6 (New large scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Victoria University of Wellington Students' Association | 123.27            | Support         | Supports REG-R6 not allowing the development of new large-scale renewable electricity generation activities within the root protection area of a tree identified in SCHED6 - Schedule of Notable Trees.   | Retain REG-R6 (New large scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Victoria University of Wellington Students' Association | 123.28            | Support         | Supports REG-R6 not allowing the development of new large-scale renewable electricity generation activities within any area identified as SCHED10 - Outstanding Natural Features and Landscapes.  | Retain REG-R6 (New large scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Victoria University of Wellington Students' Association | 123.29            | Support         | Supports REG-R6 not allowing the development of new large-scale renewable electricity generation activities within any area identified as SCHED12 - High Coastal Natural Character Areas.   | Retain REG-R6 (New large scale renewable electricity generation activities) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Meridian Energy Limited                                 | 228.61            | Oppose in part  | Supports in principle discretionary activity provision REG-R6.1 for new large scale renewable electricity generation activities in all areas of the General Rural Zone (including in overlay areas).  | Retain REG-R6.1 (New large scale renewable electricity generation activities) with amendment.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Meridian Energy Limited                                 | 228.62            | Oppose          | Supports in principle the restricted discretionary activity provision for upgrading of large scale renewable electricity generation activities and supports the matters of discretion.<br><br>Considers that proposed standards REG-S9 and REG-S10 address matters that are addressed already under the relevant standard (NZS6808:2010) which is also a requirement of the rule.<br><br>Considers discretionary activity status will allow these matters to be considered in full where these effects are likely and a standard is not necessary (and may constrain full consideration by creating an inappropriate 'permitted baseline'). | Amend Rule REG-R6.1 (New large scale renewable electricity generation activities) by deleting the requirement to comply with Standards REG-S9 (Wind turbine noise limits) and REG-S10 (Wind turbine special audible characteristics (SAC's)).   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Meridian Energy Limited                                 | 228.63            | Amend           | Considers Non complying activity status is not necessary or appropriate, particularly in this Plan where the relevant objectives and policies provide clear guidance on the values to be protected and effects to be avoided, remedied or mitigated within overlay areas.   | Delete Rule REG-R6.2 (New large scale renewable electricity generation activities) and re-number Rule REG-R6.3 as 'REG-R6.2'.   |

| Sub-part / Chapter / Provision  | Submitter Name  | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested  |
|---|---|-------------------|-----------------|---|--|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R6 | Royal Forest and Bird Protection Society                | 345.142           | Support in part | Support, but make clear in the REG policies that the ECO and other natural value/coastal environmental policies apply.  | Amend REG-R6 (New large scale renewable electricity generation activities) to refer to Ecosystem and Indigenous Biodiversity, Natural Features and Landscapes, and Coastal Environment policies.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-R7 | Royal Forest and Bird Protection Society                | 345.143           | Support         | Support and make clear in the REG policies that the ECO and other natural value/coastal environment policies apply.   | Amend REG-R7 (Renewable electricity generation activities not otherwise provided for) to refer to Ecosystem and Indigenous Biodiversity, Natural Features and Landscapes, and Coastal Environment policies.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S1 | Victoria University of Wellington Students' Association | 123.30            | Amend           | Considers that increased protection should be given to ecological sites of importance, habitats for endangered species, and native biodiversity. Such sites need to be treated as the homes of animals and as crucial to the survival of our wildlife first and foremost, not just seen in terms of their development potential.  | Clarify REG-S1 (Trimming, pruning or removal of indigenous vegetation within a significant natural area) to specify this standard also applies to ecological sites of importance, habitats for endangered species, and native biodiversity.<br><br>[Inferred decision requested].  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S1 | Fire and Emergency New Zealand                          | 273.45            | Support in part | Considers that a new assessment matter should be added in order to ensure that fire risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.   | Support REG-S1 (Trimming, pruning, removal of indigenous vegetation within a significant natural area) with amendment.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S1 | Fire and Emergency New Zealand                          | 273.46            | Amend           | Considers that a new assessment matter should be added in order to ensure that fire risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.   | Amend REG-S1 (Trimming, pruning, removal of indigenous vegetation within a significant natural area) as follows:<br><br>Assessment criteria where the standard is infringed:<br><br>...<br><br><u>3. The degree to which the trimming or removal of affected vegetation will provide for the health and safety of people, property, and the environment through the management of fire risk.</u>   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S1 | Royal Forest and Bird Protection Society                | 345.144           | Support in part | REG-S1.1.b - Oppose 2m from each side of a road or track, as this allows for a very large amount of clearance. Amend to 1m. Support this being limited to existing facilities. Should be made clear that it is also limited to existing roads/tracks/fences.<br>Delete assessment criteria 1. Amend to include assessment criteria 1. and 2. from ECO S1.   | Amend REG-S1 (Trimming, pruning or removal of indigenous vegetation within a significant natural area):<br>...<br>1. Trimming, pruning or removal of indigenous vegetation or trees within a significant natural area must be limited to:<br>a. Within 2m of the existing renewable electricity generation activity building or structure, measured at ground level;<br>b. <u>21m</u> either side of any <u>existing</u> ancillary road or access track or fence; and<br>...<br>Assessment criteria:<br><del>1. Operational needs, functional needs or other technical considerations; and</del><br>2. The effects on the identified ecological and biodiversity values of the significant natural area and the measures taken to avoid, remedy or mitigate the effects and where relevant the ability to offset effects.<br><u>3. The extent to which the trimming or removal of indigenous vegetation limits the loss, damage or disruption to the ecological processes, functions and integrity of the significant natural area; and</u><br><u>4. The effect of the vegetation removal on the identified biodiversity values.</u> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S1 | Greater Wellington Regional Council                     | 351.105           | Amend           | Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes.<br>Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna. | Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.  |

| Sub-part / Chapter / Provision  | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission  | Decisions Requested  |
|---|--|-------------------|-----------------|--|--|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S1 | WCC Environmental Reference Group        | 377.42            | Amend           | Understanding of the importance of sustainable power infrastructure. However, it is important that this is done with respect to the cultural significance of the environment.  | Requests the addition of cultural values to the list of assessment criteria where REG-S1 (Trimming, pruning or removal of indigenous vegetation within a significant natural area) is infringed, as follows:<br><br>Assessment criteria where the standard is infringed:<br>1. Operational needs, functional needs or other technical considerations; and<br>2. The effects on the identified ecological, <u>cultural</u> and biodiversity values of <u>or within</u> the significant natural area and the measures taken to avoid, remedy or mitigate the effects and where relevant the ability to offset effects. |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S2 | Royal Forest and Bird Protection Society | 345.145           | Oppose in part  | Query the volume of earthworks allowed, which may need to have tighter limits. Is this intended to apply at the same time as the vegetation removal standard, i.e. would S1 first have to be met for removing vegetation, and then the volumes here would apply? Or where earthworks were done, would S1 be irrelevant?<br>Delete the assessment criteria, and replace with the assessment criteria for ECO-S1, replacing 'trimming or removal of vegetation' with 'earthworks'.   | Amend REG-S2 (Earthworks within a significant natural area) to reduce the volume of permitted earthworks.<br>Clarify whether this standard applies in conjunction with REG-S1 or not.<br>Delete assessment criteria, replace with:<br><u>1. The extent to which the earthworks limits the loss, damage or disruption to the ecological processes, functions and integrity of the significant natural area; and</u><br><u>2. The effect of the earthworks on the identified biodiversity values.</u>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S2 | Greater Wellington Regional Council      | 351.106           | Amend           | Considers that Policy 24 of the RPS directs councils to protect indigenous ecosystems and habitats with significant indigenous biodiversity values. The 'identified' qualifier limits the consideration of effects to those values identified within the SNA at the time of plan notification. The values of most SNAs have been identified only at a high-level, and often only through desktop analysis. The assessment required to identify the scope of effects may identify additional values and this should be part of the consideration of effects at the time consent is applied for. | Seeks to amend wording to remove 'identified' before 'significant biodiversity values' when referring to adverse effects caused by activities or maintenance of biodiversity values.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S3 | Royal Forest and Bird Protection Society | 345.146           | Support in part | Include ecological and biodiversity effects in the assessment criteria.  | Amend REG-S3 (Renewable electricity generation investigation activities) to include "ecological and biodiversity effects" in the assessment criteria.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S5 | Royal Forest and Bird Protection Society | 345.147           | Support in part | Include ecological and biodiversity effects in the assessment criteria, given the risks to birds from turbines.  | Amend REG-S5 (Small scale renewable electricity generation activities - roof-mounted wind turbines) to include "ecological and biodiversity effects" in the assessment criteria.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S5 | WCC Environmental Reference Group        | 377.43            | Amend           | The reasoning behind limiting the number of roof mounted wind turbines seems extremely unclear, considering the increased risk to health and safety as well as character caused by constructing larger, broader turbines to generate the same power. Furthermore the standard discourages personal electricity generation through its limitations.   | Amend REG-S5 (Small scale renewable electricity generation activities - roof-mounted wind turbines) as follows:<br><br>1. The wind turbine must not exceed:<br>a. the permitted building height of the underlying Zone by more than 3m measured vertically;<br>b. the permitted height in relation to boundary for the underlying Zone by more than 1m measured vertically; or<br>c. a maximum rotor diameter of 2.5m.<br><br><del>2. There must be no more than one wind turbine per site.</del>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S6 | Andrew Hodge                             | 8.1               | Amend           | Considers that the current height and distance to buildings restrictions in REG-S6.2 will only allow freestanding wind turbines to be built on large rural properties. This will reduce wind energy generation potential in the Wellington District.<br>[Refer to original submission for full reason]   | Amend REG-S6.2 (Small scale renewable electricity generation activities - freestanding wind turbines) as follows:<br><br>...<br><del>2. The wind turbine must not be located within the greater of:<br/>a. 60m of a habitable building on an adjacent site; or<br/>b. A distance of 10 times the wind turbine tower's height above ground level from any site boundary that is not held in the same record of title;</del><br><br><u>2. The wind turbine must not be located within 15m of a habitable building on an adjacent site.</u>   |

| Sub-part / Chapter / Provision   | Submitter Name                           | Sub No / Point No | Position        | Summary of Submission   | Decisions Requested  |
|--|--|-------------------|-----------------|---|--|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S6  | Royal Forest and Bird Protection Society | 345.148           | Support         | Supports the standard.  | Retain REG-S6 (Small scale renewable electricity generation activities - freestanding wind turbines) as notified.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S7  | Royal Forest and Bird Protection Society | 345.149           | Support         | Supports the standard.  | Retain REG-S7 (Community scale wind turbines) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S8  | Meridian Energy Limited                  | 228.64            | Support in part | Considers that the 150m <sup>2</sup> limit on the cumulative area of solar panels on a site (in Standard REG-S8) is too small to support meaningful community scale solar electricity generation and there need to be different controls for freestanding solar panels compared with those that will occupy the existing surface of a building.   | Retain REG-S8 (Community scale freestanding solar panels) with amendment.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S8  | Meridian Energy Limited                  | 228.65            | Amend           | Considers that the 150m <sup>2</sup> limit on the cumulative area of solar panels on a site (in Standard REG-S8) is too small to support meaningful community scale solar electricity generation and there need to be different controls for freestanding solar panels compared with those that will occupy the existing surface of a building.   | Amend Standard REG-S8 (Community scale freestanding solar panels) as follows (or similar to increase the maximum area limit for solar panels):<br><br>1. Any structure must not exceed:<br>a. The permitted height in relation to boundary for the underlying Zone;<br>b. The permitted setback standards for the underlying Zone; or<br>c. A maximum height of 6m above ground level;<br><br>2. The cumulative area of solar panels on the site must not exceed <del>150m<sup>2</sup></del> ;<br><u>a. The horizontal area of the building's roof, where the solar panels are fixed to a building roof; and</u><br><u>b. 1,500m<sup>2</sup> where the solar panels are freestanding or fixed to the walls of buildings.</u> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S8  | Royal Forest and Bird Protection Society | 345.150           | Support         | Supports the standard.  | Retain REG-S8 (Community scale freestanding solar panels) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S8  | WCC Environmental Reference Group        | 377.44            | Amend           | Limitation of community scale solar panel operations goes against Wellington's long term sustainability goals.<br><br>If restrictions are necessary then the standard could be rewritten to include them however the outwrite limitation seems senseless, particularly as the standard applies to cumulative area, preventing larger communities from exploring new areas for solar installations after their quota has been met. | Amend REG-S8 (Community scale freestanding solar panels) as follows:<br><br>1. Any structure must not exceed:<br>a. The permitted height in relation to boundary for the underlying Zone;<br>b. The permitted setback standards for the underlying Zone; or<br>c. A maximum height of 6m above ground level;<br><del>2. The cumulative area of solar panels on the site must not exceed 150m<sup>2</sup>.</del>  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S9  | Meridian Energy Limited                  | 228.66            | Oppose in part  | Opposes proposed standards REG-S9.<br><br>Considers REG-S9 is addressed already under the relevant standard (NZS6808:2010)<br><br>Considers these matters will be better considered as discretionary matters rather than as standards where these effects are likely.   | Delete standard REG-S9 (Wind turbine noise limits) in its entirety.  |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S9  | Ministry of Education                    | 400.30            | Support         | Supports REG-S9 as the submitter supports the management of noise generated from wind turbines on any nearby noise sensitive activities, including educational facilities.  | Retain REG-S9 (Wind turbine noise limits) as notified.   |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S10 | Meridian Energy Limited                  | 228.67            | Oppose in part  | Opposes proposed standards REG-S9.<br><br>Considers REG-S9 is addressed already under the relevant standard (NZS6808:2010)<br><br>Considers these matters will be better considered as discretionary matters rather than as standards where these effects are likely.   | Delete standard REG-S10 (Wind turbine special audible characteristics (SAC's)) in its entirety.  |

| Sub-part / Chapter / Provision   | Submitter Name                           | Sub No / Point No | Position | Summary of Submission  | Decisions Requested   |
|--|--|-------------------|----------|--|---|
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S11 | M&P Makara Family Trust                  | 159.8             | Amend    | <p>Considers that in order to remain discretionary (restricted), Point 2 should be amended to require a wind turbine to not exceed the existing height by more than 5%.</p> <p>10% is an extra height allowance of 12.5m for existing large scale wind turbines in the rural area. Original resource consents for these turbines was predicated on visual amenity assessments provided for affected neighbouring properties, and an additional 12.5m height could significantly change some of these effects. In addition, noise levels at neighbouring residences are affected by line-of-sight - i.e. the more visible, the more likely there is to be more noise.</p> | <p>Amend REG-S11 (Upgrading of existing large scale renewable electricity generation activities) as follows (change 10% to 5%):</p> <p>...</p> <p>2. A replacement building or structure (including any wind turbine) must not exceed the height of the existing building or structure to be replaced by more than <del>10%</del>5%;</p> <p>...</p> |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S11 | M&P Makara Family Trust                  | 159.9             | Amend    | <p>Considers that REG-S11 Assessment Criteria Point 9 should be removed as it is too broad a consideration. If compliance with the standard is impractical, the upgrade should not be allowed.</p>   | <p>Amend REG-S11 (Upgrading of existing large scale renewable electricity generation activities) as follows:</p> <p>Assessment criteria where the standard is infringed:</p> <p>...</p> <p><del>9. Whether there are topographical or other site constraints that make compliance with the standard impractical;</del></p> <p>...</p>               |
| Energy Infrastructure and Transport / Renewable Electricity Generation / REG-S11 | Royal Forest and Bird Protection Society | 345.151           | Support  | <p>Supports the standard.</p>  | <p>Retain REG-S11 (Upgrading of existing large scale renewable electricity generation activities) as notified.</p>  |