Section 7: Enabling development of renewable energy under the Resource Management Act 1991

This chapter considers policy options to enable renewable energy development under the Resource Management Act 1991 (RMA). We seek your views on the following key options:

- Amending the National Policy Statement for Renewable Electricity Generation (NPSREG) to provide stronger direction on the national importance of renewables
- Scoping National Environmental Standards or National Planning Standards specific to renewable energy (note: we propose to prioritise amending the NPSREG while proceeding with this scoping work.)
- Other options including spatial planning, pre-approval of new renewable energy developments, and amending other RMA national direction instruments.

This chapter also notes a wider range of options that could enable renewable development, including the comprehensive review of the resource management system.

This chapter does not discuss the options relating to facilitating cleaner industrial production (such as switching from coal-fired boilers to wood chip boilers) under the RMA framework. Those options are discussed in sections 2 and 4.

Background

New Zealand will need to build a significant amount of new renewable generation to meet future electricity demand and our climate change goals. Any new projects that might affect the environment, ranging from construction of wind farms and hydro dams to installations of boilers, will require resource consent under the RMA.

Some resource consents for existing renewable energy facilities are also due to be re-consented in the near future (e.g. the Waitaki hydro generation scheme in 2025). Technological advancements also mean that some consented, but unbuilt, renewable energy projects may seek to have their resource consents amended or re-consented in order to use the latest technology, rather than the technology available at the time the consent was granted (for example, larger wind turbines).

Central government has issued a number of national direction instruments under the RMA to give local government direction on environmental issues. Councils must have regard to these national direction instruments when making decisions on resource consents. For plans and regional policy statements, councils must give effect to national policy statements, and amend their plans to remove any duplication or conflict with national environmental standards (NES).

The national direction instrument most relevant to renewable energy development is the National Policy Statement for Renewable Electricity Generation 2011 (NPSREG), which sets out an objective and policies to enable the sustainable management of renewable electricity generation (REG) under the RMA.

The other national direction instruments most relevant to renewable energy development include:

a. The National Policy Statement for Electricity Transmission 2008 (NPSET).

b. National Environmental Standards for Electricity Transmission Activities 2009 (NPSETA).

c. The National Policy Statement for Freshwater Management 2014 (amended 2017) (NPSFM) (relevant to hydro generation).

d. The New Zealand Coastal Policy Statement 2010 (NZCPS) (particularly relevant to renewable energy projects in coastal areas).

e. National Environmental Standards for Air Quality 2004 (NESAQ) (relevant to the development of wood energy facilities).

f. The National Planning Standards 2019 (these standards require plans to use the noise measurement methods and symbols set out in the New Zealand Standard on wind farm noise[46]).

RMA-related proposals subject to separate public consultations

Comprehensive review of the resource management system

There are a range of RMA-related policy proposals that are being developed or consulted on separately. They may have implications for renewable energy development, but are not included in this discussion document. These proposals include:

- A comprehensive review of the resource management system, focusing on the RMA ;
- The Essential Freshwater package, which includes proposals to amend the NPSFM; and
- A proposed National Policy Statement for Indigenous Biodiversity (NPSIB), which includes provisions for managing adverse effects on significant natural areas and could have implications for development of energy resources sites and mining proposals.

What's the problem?

This section responds to the following recommendations from:

- the Productivity Commission's *Low Emissions Economy* report*:*

  13.3 The Government should give priority to revising both the NPS-REG and the NPS-ET to ensure that local authorities give sufficient weight to the role that renewable electricity generation and upgrades to the transmission network and distribution grid will play in New Zealand's transition to a low-emissions economy. This will likely require making the language of the NPS-REG and the NPS-ET more directive, and to be more explicit about how the benefits of renewable electricity generation should be recognised and given effect in regional and territorial authority planning instruments.

  13.4 The Government should issue a new National Environmental Standard for Renewable Electricity Generation that sets out the conditions under which renewable energy activities are either permitted, controlled, restricted discretionary or non-complying activities under the Resource Management Act 1991. This should be drafted to increase the speed, and lower the cost and uncertainty for obtaining resource consents for a significant proportion of renewable electricity generation projects that have only minor environmental and social impacts.

- the ICCC's *Accelerated Electrification* report:

  4a The Government should ensure the value of existing hydro generation to New Zealand's climate change objectives is given sufficient weight when decisions about freshwater are

[46] NZS 6808:2010 Acoustics – Wind farm noise.

made, including by strengthening and clarifying national direction on making trade-offs between hydro generation and freshwater objectives across National Policy Statements.

5a The Government should provide for the development of wind generation and its associated transmission and distribution infrastructure at scale by revising the National Policy Statement for Renewable Electricity Generation to resolve issues relating to lapsing and varying consents, and re-powering existing wind farms.

5b The Government should develop National Environmental Standards to enable timely consenting of wind generation, both large and small, and transmission and distribution infrastructure. This should include proactively identifying which types of landscapes are likely to be particularly suitable for wind infrastructure.

Resource consents are a crucial part of the resource management system. The consent process helps ensure the environmental effects of a renewable energy proposal (which often are significant) are appropriately managed. The resource consent process also needs to reconcile the national benefits of renewable energy projects with the local impacts.

A number of concerns have been expressed around consenting processes under the RMA. These are summarised in the reports of the Productivity Commission (2018) and ICCC (2019).

The Productivity Commission's (the Commission) 2018 report on a Low-Emissions Economy noted that obtaining resource consents under the RMA may slow further expansion of New Zealand's renewable energy development. The Commission found that the language of the NPSREG was not sufficiently directive to give weight to the central role for renewable energy generation in a transition to a low-emissions economy.

The Commission also noted uncertainty for hydro generators over water allocation decisions[47], and that decisions on resource consents for transmission/distribution grid investment can be time consuming and costly.

The ICCC's 2019 report on *Accelerated Electrification* noted the policy uncertainty between different national instruments (e.g. weighing the value for hydro generation in hydro schemes versus freshwater management goals). The ICCC also noted challenges to consenting renewable energy generation and recommended a streamlining of consenting and re-consenting processes – including constraining the ability to decline applications for wind generation due to landscape or visual considerations.

The case study below illustrates that it can still be challenging to obtain resource consents for renewable energy projects, despite the introduction of the NPSREG.

[47] Note that this uncertainty for hydro generators could potentially be reduced by the *Essential Freshwater* package, which includes proposals to amend the NPSFM.

Case study: Blueskin wind generation proposal

Blueskin Energy Ltd pursued establishment of a community-scale wind generation project in Blueskin Bay near Dunedin between 2009 and 2017. BEL started the feasibility and planning process in 2009, and BEL lodged the original resource consent application for the project in 2015 to construct and operate three wind turbines. The Dunedin City Council declined the original application on the grounds of adverse amenity impacts particularly from one turbine. In preparation for mediation prior to the Environment Court hearing, BEL revised its proposal to just constructing and operating a single 3MW turbine. The Environment Court ultimately declined consent on the basis of the turbine's adverse visual amenity effects in 2017.

The NPSREG was considered in this case. The Environment Court interpreted Policy A of the NPSREG, which provides that "decision-makers shall recognise and provide for the national significance of renewable electricity generation activities…", as requiring the court to have regard to the NPSREG's objective and policies and weigh them appropriately. The Environment Court considered that Policy A does not necessarily provide for a REG activity by a grant of consent in the absence of any matters of national importance stated in section 6 of the RMA. [48]

What are the options?

We are seeking your feedback on stronger national direction under the RMA on the importance of renewable energy, through revisions to the NPS-REG and potential development of complementary NES or National Planning Standards. These options relate to recommendations 13.3 and 13.4 of the Productivity Commission's *Low Emissions Economy* report[49], and recommendations 4a, 5a and 5b of the ICCC's *Accelerated Electrification* report[50].

Revising the NPSREG (proposal 7.1) is a priority of the Renewable Energy Strategy work programme.

This discussion paper also seeks feedback on other potential options – including an enhanced role for spatial planning, or changes to other national direction instruments.

Amend the National Policy Statement for Renewable Electricity Generation

Proposal 7.1	**Amend the National Policy Statement for Renewable Electricity Generation, including potential expansion of its scope to cover a broader range of renewable energy activities**

Description

The NPSREG acknowledges the national significance of renewable electricity generation (REG) in the RMA framework, and aims to promote a more consistent national approach to RMA decision-making for REG projects.

[48] *Blueskin Energy Ltd v Dunedin City Council* [2017] NZEnvC 150.
[49] The Productivity Commission's recommendations are shown in Annex Two.
[50] The ICCC's recommendations are shown in Annex One.

To date, the NPSREG does not appear to have had a significant impact on the time and cost of the consenting process for REG projects. An evaluation[51] of the effectiveness of the NPS-REG completed in 2016 found that:

- NPSREG had not noticeably improved the consistency of planning provisions across councils.
- The NPSREG did not appear to have had any significant effect on the time, complexity or cost of consenting for REG projects.
- One of the particular concerns raised, by generation investors in particular, is that the language of the NPSREG is not directive enough and, consequently, does not have a binding effect. When the NPSREG is weighed alongside other instruments in RMA decision-making, it receives a lower priority than the RMA instruments that are more directive (such the NPSFM).

We are beginning work to identify policy options to amend the NPSREG to provide councils with clearer direction on how to provide for renewable energy projects in RMA instruments such as district/regional plans and regional policy statements. This could help provide more certainty for the consenting process for REG projects.

Details of any proposed amendments to the NPSREG will need to be developed further and are subject to further consultation. We consider that, at a high level, the NPSREG could be amended to provide clearer direction on some or all of the following matters:

a. How to consider the national benefits of renewable energy generation when making decisions on renewable energy consent applications;

b. How to locate and plan strategically for renewable energy resources — for example, the amended NPSREG could set out policies and/or directives that would require councils to:

    i. Identify potential areas for renewable energy resources in their planning framework (e.g. existing and potential wind and solar farm sites and geothermal sites);

    ii. Develop specific strategies or policies for renewable energy development; and/or

    iii. Identify areas where facilities for certain types of renewable energy (e.g. wind energy) definitely should not be developed (for purposes such as aviation and conservation);

c. The relationship of the NPSREG to freshwater management decisions (note: Policy E2 of the NPSREG relates to hydroelectricity resources and the preamble of the NPSREG states that "This national policy statement does not apply to the allocation and prioritisation of freshwater".);

d. Facilitating upgrades of new and existing renewable energy facilities;

e. Facilitating renewal of lapsing consents for renewable energy projects that would require updated technical specifications, which would allow the latest, most efficient technologies to be deployed;

f. Facilitating renewal of existing consents for existing renewable energy facilities;

g. Catering for the need to develop transmission and distribution networks for connection to REG facilities, e.g. clarifying the linkage between the NPSREG and the NPSET and NESETA by

[51] MfE and MBIE (2016). *Report of the Outcome Evaluation of the National Policy Statement for Renewable Electricity Generation*. Retrieved from https://www.mfe.govt.nz/publications/rma/report-of-outcome-evaluation-of-national-policy-statement-renewable-electricity

setting out more specific policies for such networks in the NPSREG and cross-referencing the NPSET and NESETA;

h. Enabling or facilitating development of small-scale renewable energy facilities; and

i. Acknowledging community benefits or local and social impacts of renewable energy projects.

Another potential amendment that could be explored is whether the scope of the NPSREG should be expanded to cover not only REG but also all other types of renewable energy, e.g. wood energy, liquid biofuels, green hydrogen and waste-to-energy.

This would acknowledge the role the other types of renewable energy play in New Zealand's transition towards a net zero emissions economy. The challenge, however, would be how to capture a potentially broad and changing range of activities, with highly varied scales and environmental effects. More discussion on the consenting barriers to wood energy has been discussed in Section 2.

Analysis

If the amended NPSREG in practice reduces the cost and uncertainty of investment in renewable generation, these changes could contribute to the facilitation of renewable energy by:

- Improving consistency in planning and consenting decisions on renewable energy facilities and activities;
- Enabling more weight to be given to renewable energy in these decisions; and
- Encouraging councils to plan strategically for renewable energy development.

The impact of this option will depend on the aggregate impact of multiple developments, and is subject to many factors outside of the RMA process. The impact of the amended NPSREG in terms of reducing consenting costs and uncertainty would depend on how directive the revised NPSREG would be, how the revised NPSREG would interact with other national direction instruments, and how councils implement it.

An amended NPSREG would also provide stronger direction on how to weigh renewable energy generation against potentially competing values under the RMA (e.g. amenity or biodiversity values). Its impact on potentially competing values will depend on the details of the NPSREG amendments, which are yet to be developed.

There will be costs for councils to implement the NPSREG through revising relevant planning instruments. The precise costs will depend on how large the changes are, and where councils are in their planning cycle (for example, whether they are already in the process of reviewing relevant plans, or need to do a standalone change).

With the NPSREG providing for more directive policies, and a number of other national direction instruments in development, there is a risk of clashing priorities between different instruments. The wording of the NPSREG amendments will need to be carefully drafted in consultation with other agencies which have developed, or are developing, RMA national direction instruments.

Questions

Q7.1	Do you consider that the current NPSREG gives sufficient weight and direction to the importance of renewable energy?
Q7.2	What changes to the NPSREG would facilitate future development of renewable energy? In particular, what policies could be introduced or amended to provide sufficient direction to councils regarding the matters listed in points a-i mentioned on page 59 of the discussion document?
Q7.3	How should the NPSREG address the balancing of local environmental effects and the national benefits of renewable energy development in RMA decisions?
Q7.4	What are your views on the interaction and relative priority of the NPSREG with other existing or pending national direction instruments?
Q7.5	Do you have any suggestions for how changes to the NPSREG could help achieve the right balance between renewable energy development and environmental outcomes?
Q7.6	What objectives or policies could be included in the NPSREG regarding councils' role in locating and planning strategically for renewable energy resources?
Q7.7	Can you identify any particular consenting barriers to development of other types of renewable energy than REG, such as green hydrogen, bioenergy and waste-to-energy facilities? Can any specific policies be included in a national policy statement to address these barriers?
Q7.8	What specific policies could be included in the NPSREG for small-scale renewable energy projects?
Q7.9	The NPSREG currently does not provide any definition or threshold for "small and community-scale renewable electricity generation activities". Do you have any view on the definition or threshold for these activities?
Q7.10	What specific policies could be included to facilitate re-consenting consented but unbuilt wind farms, where consent variations are needed to allow the use of the latest technology?
Q7.11	Are there any downsides or risks to amending the NPSREG?

Scope National Environmental Standards or National Planning Standards specific to renewable energy

Proposal 7.2	**Option A: Scope National Environmental Standards for Renewable Energy Facilities and Activities** **Option B: Scope additional renewable-energy-related content for inclusion in the National Planning Standards**

Description

National Environmental Standards (NES) are regulations made under the RMA and:

- Set out technical standards, methods or requirements relating to matters under the RMA.
- Provide consistent rules across the country by setting planning requirements for certain specified activities.

NES can have a significant direct impact on resource consent processes. At this time, we are proposing to prioritise amendments to the NPSREG, while proceeding with background work on complementary National Environmental Standards for Renewable Energy Facilities and Activities (NESREFA).

The details of potential NESREFA are yet to be developed, but could potentially cover some or all of the following:

a. Standardising the consent process for re-consenting and repowering (upgrading) existing renewable energy generation facilities;

b. Standardising the consent process for re-consenting consented but unbuilt renewable energy generation facilities, where the existing consent is due to expire and/or consent variations are needed to allow the use of the latest technology;

c. Prescribing standards for shadow flicker from wind turbines (Note: We will consider through the policy development process whether it might be better to include these standards in the National Planning Standards);

d. Standardising the consent process for small-scale renewable energy projects;

e. Standardising the consent process for new renewable energy generation proposals;

f. Standardising the consent process for adaptive management practices for geothermal electricity generation, such as drilling activities associated with adjusting the location of pipelines and operational plant; and/or

g. Setting out the consenting framework for high voltage lines that are connected to REG facilities but are not part of the National Grid. (Note: High voltage lines that are not part of the National Grid are not covered by the existing NPSET and NESETA).

As we scope the standards and rules that could be covered by NESREFA, we will assess whether NESREFA or the National Planning Standards would be more appropriate for prescribing standards and rules to drive changes in the planning and resource consent processes.

Under the RMA, National Planning Standards can specify different elements of council plans and policy statements, including objectives, policies, methods (including rules), other provisions, structure and form, and requirements that relate to electronic accessibility and functionality. The first set of National Planning Standards, which were introduced earlier in 2019, focus on providing nationally consistent structure, format, definitions, noise and vibration metrics and electronic functionality and accessibility, rather than setting out objectives and policies. More specifically, National Planning Standards prescribe the use of standard measurement methods and symbols for plan rules that manage wind turbine noise, but there is scope to include more renewable energy content in National Planning Standards in the future.

Analysis

NESREFA could significantly and directly reduce the costs and uncertainty in the consenting process for renewable energy facilities and activities through standardising the consenting process. NESREFA could clearly identify the activity status of different renewable projects – for example which activities would be permitted activities[52] under the RMA, or would require a resource consent.[53] This would give strong and consistent direction on the required level of consideration under the RMA for

[52] Under the RMA, permitted activities do not require a resource consent.

[53] Under the RMA, activities that need a resource consent are classified as controlled, restricted discretionary, discretionary and non-complying. Councils have to grant a resource consent for a controlled activity (with a couple of exceptions) but can refuse to grant a resource consent for a restricted discretionary, discretionary or non-complying activity.

specific activities. The positive impact on the consenting process could be particularly noticeable for wind farm projects and small-scale renewable energy projects if the NESREFA sets out a favourable consenting framework for these types of projects. This would support increased supply of renewable energy, and support reduction of greenhouse gas emissions.

The impact of NESREFA on values other than renewable energy (such as amenity or biodiversity values) would depend on the details of the NESREFA amendments, which are yet to be developed.

The implementation costs of a proposed NESREFA could be lower than those for implementing an amended NPSREG. The reason is that NESREFA provisions can set specific consenting rules, while the NPSREG cannot. The specific consenting rules would eliminate the need to interpret NESREFA provisions plan-by-plan.

It is likely to be more complex to develop NESREFA than to amend NPSREG because national environmental standards tend to more detailed and technical in nature than national policy statements.

Because of the relative complexity, the administrative cost to the Government for developing the NESREFA could be significantly higher than that for amending the NPSREG, and it could potentially also take longer to develop NESREFA than to amend NPSREG. Based on past experience, it could take between two and five years to develop. A technical expert panel with representatives from various sectors (such as the electricity and planning sectors) may need to be set up to develop NESREFA.

The benefits, costs and risks associated with developing the NESREFA (option A) also apply to developing additional renewable energy content for the National Planning Standards (option B).

Questions

Q7.12	Do you think National Environmental Standards (NES) would be an effective and appropriate tool to accelerate the development of new renewables and streamline re-consenting? What are the pros and cons?
Q7.13	What do you see as the relative merits and priorities of changes to the NPSREG compared with work on NES?
Q7.14	What are the downsides and risks to developing NES?
Q7.15	What renewables activities (including both REG activities and other types of renewable energy) would best be suited to NES? For example: • What technical issues could best be dealt with under a standardised national approach? • Would it be practical for NES to set different types of activity status for activities with certain effects, for consenting or re-consenting? For example, are there any aspects of renewable activities that would have low environmental effects and would be suitable for having the status of permitted or controlled activities under the RMA?
Q7.16	Do you have any suggestions for what rules or standards could be included in NES or National Planning Standards to help achieve the right balance between renewable energy development and environmental outcomes?
Q7.17	Would National Planning Standards or any other RMA tools be more suitable for providing councils with national direction on renewables than the NPSREG or NES?

Other options for feedback

We seek your feedback on the following options that we have considered, but at this stage we do not recommend be developed further. We need further information on the merits of these options before deciding whether further work is warranted.

Spatial planning

Spatial planning is a form of strategic planning. It is broad and long-term in its focus and integrates social, evidence-based economic, environmental and cultural dimensions across a defined (usually large-scale) area. It can be used as a tool to integrate policy and practice across land use regulation, infrastructure planning and investment through different levels of government (national, regional, territorial) and sometimes legislation (for example, aligning land-use planning and transport infrastructure investment in urban centres).

Spatial planning is strategic and high-level; it is not prescriptive land use planning (designations, zones or rules), or structure or area plans (these identify land use at a more detailed level). Internationally, there are some examples of spatial planning for future renewables development.[54]

Currently, there is no consistent framework for spatial planning in New Zealand. The application of spatial planning in New Zealand has, at times, been ad-hoc and disconnected from other types of planning. For example, it has generally not been developed in a partnership with central government, even though collective central government decisions (e.g. on transport infrastructure, education and health facilities and public housing) can have a significant impact on the growth of a place or region. Auckland Council is the only local authority that is legally required to prepare a spatial plan; however, spatial planning has been undertaken on a voluntary basis in other places (e.g. SmartGrowth in the Bay of Plenty and Future Proof in the Waikato).

Spatial planning is one of the five pillars of the Urban Growth Agenda. The pillar is initially focussed on Auckland and the Auckland-Hamilton corridor, with the aim of building stronger partnerships with local government as a means of developing integrated spatial planning.

This discussion document does not propose the creation of new statutory spatial planning tools in relation to energy, as a new legislative framework for spatial planning is best considered as part of the comprehensive review of the resource management system (RM system review), which is planned for 2020.

However, we are interested in views on whether a stronger spatial planning approach could be taken under the status quo. This would involve government agencies, local government, and energy sector organisations collaborating, and working with iwi and communities, to plan for the future strategic mix of activities and values in an area.

This could, for example, involve looking at potential renewable energy sites in relation to transmission links, future energy demand areas, and biodiversity and landscape values. In the "Connecting to the national grid" section (section 10) of this discussion document, we discuss the options for addressing the gaps in publicly available and independent information on these potential sites, and a lack of information sharing between companies. Filling this information gap and facilitating information sharing through actions such as options identified in the "Connecting to the national grid" section (section 10) could help inform identification in RMA plans of areas suitable for renewables, and help align future planning across transmission, distribution and generation stakeholders.

[54] For example, in South Australia, the State-wide Wind Farm Development Plan Amendment explicitly envisages wind farms in all rural type zones in the state.

A stronger spatial planning approach can also potentially be used to facilitate development of bioenergy markets and industry clusters. This could involve identifying the optimal location of industry clusters that could make use of wood energy and the associated infrastructure, based on the economics of transporting woody biomass to different areas. Central government can explore that with local government when undertaking the initiatives mentioned in section 2, such as the development of the Forest Strategy and the Industry Transformation Plan for the Wood Processing and Forestry sector.

Questions

Q7.18	Are there opportunities for non-statutory spatial planning techniques to help identify suitable areas for renewables development (or no go areas)?

Pre-approval of new renewables developments

We have also considered options around the 'pre-approval' of renewables activities. This, in general, refers to measures that would give a high degree of certainty to an operator that they could obtain the required regulatory approvals (in the form of resource consents in the case of the existing RMA framework). Such measures could streamline the regulatory approval process, thereby improving business certainty and reducing compliance costs for consenting. They could help attract further investment into renewables, especially from parties (e.g. community groups or overseas investors) which may struggle to navigate the RMA system.

Pre-approval option A: Planning approaches including relatively permissive consenting rules for renewables in defined areas

As mentioned above in the section on spatial planning, planning for suitable renewables sites, or 'no go' zones, can give increased certainty for resource consent applications. It is possible for districts and regions to have quite permissive rules for consenting of renewables in defined areas through rules on activity status, depending on the environmental effects of the activities concerned.

Pre-approval option B: Crown acquiring consents for transfer to developers

A more direct option would be for the Government (or another development-focused agency) to obtain resource consents for an 'envelope' of activities and effects that could then be transferred to another party for implementation. The resource consents would need conditions sufficiently flexible to cope with future technological developments, and the specific requirements of the end user.

This option would have significant cost and resourcing implications for the Government, which would effectively need to set up a new development arm (which could be established within an existing government agency or as a separate entity), to undertake extensive consultation with potential operators and local communities to undertake feasibility assessments, and to prepare resource consent applications for the renewable energy sites concerned.

To some extent, the options identified in the "Connecting to the national grid" section (section 10) to fill the information gap could facilitate the necessary feasibility assessments.

The advantage of this option is that it would provide a means to directly allocate regulatory approvals to new investors, or small-scale community operators. On the other hand, this option would potentially 'crowd out' non-government operators with interest in the site. Also, the effectiveness of this option could be limited by the risks that a large proportion of the potential renewable energy sites are already under the control of existing operators, and that operators may not be interested in the resource consents obtained by the Crown because they prefer developing the sites they already control.

Pre-approval option C: New statutory allocation process
A pre-consenting option outside the RMA framework would be for central government to identify appropriate renewable sites and set up a new statutory process for allocating these sites for use and development.

However, this option would require creating a new statutory regime, which could compete with and confuse the existing RMA framework and comprehensive RM system review. There would be high compliance and administration costs in the setup and operation of a new statutory regime. It also appears disproportionate to the size of the problem, given that there currently are a number of consented, but yet-undeveloped, renewable energy sites.

The effectiveness of this option could also be limited by the risk that most of the potential renewable energy sites are already owned by operators or other landowners.

Questions

Q7.19	Do you have any comments on potential options for pre-approval of renewable developments?

Amend other RMA national direction instruments

We have considered the options of amending the National Policy Statement on Electricity Transmission (NPSET) and the National Environmental Standards for Electricity Transmission Activities (NESETA) to improve consistency in the RMA decisions on electricity network connections to renewable electricity generation.

For example, some stakeholders have suggested the NPSET could be more specific for re-conductoring activities, enabling changes to the National Grid, while the NESETA could better reflect current routine maintenance practices with minor environmental impacts, particularly in urban areas.[55]

At this time, we intend to prioritise work on a revised NPSREG/potential NESREFA, as we consider this will have the greatest impact on development of new REG. However, we would appreciate feedback on the relative merits of amending these instruments, and what changes you would suggest.

Questions

Q7.20	Are the current NPSET and NESETA fit-for-purpose to enable accelerated development of renewable energy? Why?
Q7.21	What changes (if any) would you suggest for the NPSET and NESETA to accelerate the development of renewable energy?
Q7.22	Can you suggest any other options (statutory or non-statutory) that would help accelerate the future development of renewable energy?

[55] MfE and MBIE (2019). *Evaluation of the effectiveness of the National Policy Statement on Electricity Transmission and National Environmental Standards for Electricity Transmission Activities*. Retrieved from https://www.mfe.govt.nz/publications/rma/evaluation-of-effectiveness-of-national-policy-statement-electricity-transmission.

Summary assessment of options against criteria

	Amend NPSREG (impacts on consenting and energy prices would be indirect.)	**Scoping NES or National Planning Standards specific to renewable energy**	**Pre-approval of new renewable developments – planning approaches including relatively permissive consenting rules in defined areas**	**Pre-approval of new renewable developments – Crown acquiring consents for transfer to developers** (assuming that resource consents are sought by central government but are granted in line with existing councils' rules)	**Pre-approval of new renewable developments – new statutory allocation process**	**Amending NPSET and NESETA**
To what extent is the barrier addressed?	✓✓	✓✓✓	✓✓✓	✓ Effectiveness could be limited by the risk that most potential renewable energy sites are already owned by operators or other landowners	✓	✓
Primary benefits – emissions reductions	✓	✓	✓	✓	✓	✓
Primary benefits – EE & RE	✓	✓	✓	✓	✓	✓
Wider economic effects	Uncertain	✓	Uncertain	Uncertain	Uncertain	✓
Reduction in compliance costs	✓✓	✓✓✓	✓✓✓	✓✓✓	Uncertain – it depends on design of new process	✓✓✓
Administration costs	X	X X	X X	X X X	X X X	X X
Energy trilemma – security and affordability	Uncertain	✓	✓✓	Uncertain	Uncertain	✓

Key:	Proposal under active consideration	Option not preferred