28 February 2020

Energy Markets Policy Building, Resources and Markets
Ministry of Business, Innovation & Employment
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New Zealand

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Christchurch City Council submission on the *Accelerating Renewable Energy and Energy Efficiency* discussion document.

Christchurch City Council (the Council) thanks Ministry of Business, Innovation & Employment (MBIE) for the opportunity to provide comment on the *Accelerating Renewable Energy and Energy Efficiency* discussion document.

Please find attached the completed questionnaire with the Council's responses.

Further information pertaining to 'Section 7: Enabling development of renewable energy under the Resource Management Act 1991' has been included as Attachment A.

Thank you for the opportunity to provide this submission.

For clarification on points within this submission that relate to Resource Management, please contact Peter Eman, Principal Advisor Planning at Privacy of natural persons For any clarification with respect to the rest of this submission contact Kevin Crutchley, Resource Efficiency Manager at Privacy of natural persons

Yours faithfully

Privacy of natural persons

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Christchurch City Council

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TRIM: 20/182215

Accelerating renewable energy and energy efficiency - Have your say

Introduction

* 1. **Name (first and last name)**

Privacy of natural persons

* 2. **Email**

Privacy of natural persons

* 3. **Is this an individual submission, or is it on behalf of a group or organisation?**

☐Individual
☒On behalf of a group or organisation

* 4. **Which group do you most identify with, or are representing?**

☐ Iwi or hapū
☐ General public
☐ Environmental
☒ Local government
☐ Research institute / academia
☐ Transmission or distribution sector
☐ Industry or industry advocates
☐ Central government agency
☐ Other (please specify)
☐ Electricity sector
☐ Community organisation
☐ Energy intensive and highly integrated industry
☐ Large energy user
☐ Oil and gas sector
☐ Biomass or geothermal sector
☐ Consultant, financial services etc
☐ Coal sector

*5. **Business name or organisation (if applicable)**

Christchurch City Council

*6. **Position title (if applicable)**

Resource Efficiency Manager

* 7. **Important information about your submission (important to read)**

The information provided in submissions will be used to inform the Ministry of Business, Innovation and Employment's (MBIE's) work on *Accelerating renewable energy and energy efficiency*.

We will upload the submissions we receive and publish them on our website. If your submission contains any sensitive information that you do not want published, please indicate this in your submission.

The Privacy Act 1993 applies to submissions. Any personal information you supply to MBIE in the course of making a submission will only be known by the team working on the *Accelerating renewable energy and energy efficiency*.

Submissions may be requested under the Official Information Act 1982. Submissions provided in confidence can usually be withheld. MBIE will consult with submitters when responding to requests under the Official Information Act 1982.

We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?

☒ Yes
☐ No

* 8. **Can we include your name?**

☐Yes
☒No

* 9. **Can we include your organisation (if submitting on behalf of an organisation)?**

☒Yes
☐ No

10. All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act.

Please indicate if there is any other information you would like withheld.

11. **[FOR INDIVIDUALS] Where are you located?**

☐ Northland / Te Tai Tokerau
☐ Auckland / Tamaki-makau-rau
☐ Waikato
☐ Bay of Plenty / Te Moana-a-Toi
☐ Gisborne / Te Tai Rāwhiti
☐ Hawke's Bay / Te Matau-a-Māui
☐ Taranaki
☐ Manawatū-Whanganui
☐ Wellington / Te Whanga-nui-a-Tara
☐ Tasman / Te Tai-o-Aorere
☐ Nelson / Whakatū
☐ Marlborough / Te Tauihu-o-te-waka
☐ West Coast / Te Tai Poutini
☐ Canterbury / Waitaha
☐ Otago / Ōtākou
☐ Southland / Murihuku
☐ Outlying Islands, including Chatham Islands

12. **[FOR ORGANISATIONS] In what region or regions does your organisation mostly operate?**

☐ Northland / Te Tai Tokerau
☐ Auckland / Tamaki-makau-rau
☐ Waikato
☐ Bay of Plenty / Te Moana-a-Toi
☐ Gisborne / Te Tai Rāwhiti
☐ Hawke's Bay / Te Matau-a-Māui
☐ Taranaki
☐ Manawatū-Whanganui
☐ Wellington / Te Whanga-nui-a-Tara
☐ Wellington / Te Whanga-nui-a-Tara
☐ Tasman / Te Tai-o-Aorere
☐ Nelson / Whakatū
☐ Marlborough / Te Tauihu-o-te-waka
☐ West Coast / Te Tai Poutini
☒ Canterbury / Waitaha
☐ Otago / Ōtākou
☐ Southland / Murihuku
☐ Outlying Islands, including Chatham Islands

Areas you wish to provide feedback on

The *Accelerating renewable energy and energy efficiency* discussion document examines a range of barriers and issues, and seeks feedback on a range of options. The document is divided in two parts:

- **Part A: Encouraging greater energy efficiency and the uptake of renewable fuels in industry (process heat)**
- **Part B: Accelerating renewable electricity generation and infrastructure (renewable electricity generation)**

Each part has multiple sections. You are invited to provide feedback and respond to questions in as many, or as few of the sections as you would like, depending on your interests.

13. **<u>Part A</u> relates to process heat.**

Please indicate which sections, if any, you would like to provide feedback on.

☒ Section 1: Addressing information failures

☐ Section 2: Developing markets for bioenergy and direct geothermal use

☒ Section 3: Innovating and building capability

☒ Section 4: Phasing out fossil fuels in process heat

☒ Section 5: Boosting investment in renewable energy and energy efficiency technologies

☒ Section 6: Cost recovery mechanisms

14. **<u>Part B</u> relates to renewable electricity generation.**

Please indicate which sections, if any, you would like to provide feedback on.

☒ Section 7: Enabling renewables uptake under the Resource Management Act 1991

☐ Section 8: Supporting renewable electricity generation investment

☒ Section 9: Facilitating local and community engagement in renewable energy and energy efficiency

☐ Section 10: Connecting to the national grid

☐ Section 11: Local network connections and trading arrangements

Section 1: Addressing information failures

This section explains the issues relating to information failures and asymmetries and seeks your views on options to:

- **Require large energy users to publish Corporate Energy Transition Plans (including reporting emissions annually), and conduct energy audits every four years**
- **Develop an electrification information package for businesses looking to electrify process heat, and offer co-funded low-emissions heating feasibility studies for Energy Efficiency and Conservation Authority's (EECA's) business partners, and • Provide benchmarking information for food processing industries.**

15. **Option 1.1 would require large energy users to report their emissions and energy use annually, publish Corporate Energy Transitions Plans and conduct energy audits every four years.**

Do you support this option?

☐ Yes - I fully support this option

☒ I support this option in part

☐ No - I do not support this option

16. **Please explain your answer**

Council supports large energy users reporting on their greenhouse gas (GHG) emission footprint and management plans for their organisation including energy use. A GHG emission footprint for an organisation should be conducted annually by an accredited external GHG emission footprint auditor (e.g. accredited auditors through Carbon and Energy Professionals New Zealand).
Please see answers in the following question.

17. **Which parts (set out in Table 3 of Section 1 in the discussion document) do you support?**

☐ Target group - companies with an annual energy spend of greater than $2 million per annum

☒ Public reporting

☒ Government reporting

☒ Energy auditing

☒ Compliance

18. **Please explain your answer**

Council supports the general principle of the target group, public reporting, Government reporting, energy auditing and compliance with modifications that are listed below.

1. Target Group: We suggest considering organisations with an annual energy spend of greater than $1 million per annum as the target group. A $1 million per annum energy spend is still a relatively high energy spend in New Zealand and using this energy spend amount would widen the target group for engagement, reporting and action on GHG emission reduction. Suggest using a different word than companies, e.g. organisations, because large energy users include organisations such as Council's and District Health Boards etc.

2. Public reporting: Require annual reporting on the organisation's GHG emission footprint using ISO 14064 and annual reporting on their GHG emission reduction management plan to 2030 and its progress. ISO 14064 should be used as the methodology to measure and report on their GHG emission footprint and for public and Government reporting purposes because we need consistency in reporting using the ISO 14064 standard. The Government should clearly define what GHG emissions need to be measured and included in the scopes of ISO 14064 for the public and Government reporting. The name of the accredited GHG emission auditor that did the annual audit should be included in the annual GHG emission report. Organisations that use ISO 14064 methodology measure other GHG emissions not just from energy sources therefore this annual reporting should also require reporting on GHG emissions from solid waste, waste water treatment plants etc. This would keep consistency of reporting on GHG emissions from an organisation.

3. Reporting to Government should include what is reported to the public including the suggestions noted above in public reporting. Councils have a range of activities and assets so energy consumption by process is not practical.

4. Consider having the requirement for an internal or external energy audit at least every three years instead of four years.

The annual GHG emission footprint for an organisation needs to meet the ISO 14064 standard and needs to be audited and signed-off by an accredited external GHG emission footprint auditor.

19. **What public reporting requirements (listed in Table 3) should be disclosed?**

☒ Annual corporate level energy use and emissions, split out by a range of sources, including coal, gas, electricity and transport

☒ energy efficiency actions taken that year

☒ Plans to reduce emissions to 2030

☒ Other (please specify)

Please also see the answers in the above questions.
The annual organisation reporting requirements should include the organisation's GHG emission footprint with GHG emissions split out into sources of GHG emissions as required in the ISO 14064 standard.

A GHG emission reduction management plan through to 2030 should be reported on and the progress with the delivery of the GHG emission reduction plan should be reported on annually. The energy efficiency actions taken that year should be reported alongside the other GHG emission reduction actions taken.

20. **In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?**

☒ Yes

☐ No

Please explain your answer

Within the organisation's GHG emission footprint, using ISO 14064, the type of energy used for the organisation's transport that they operate should be included, e.g. their fleet energy use by type of energy.

21. **For manufacturers: what will be the impact on your business to comply with the requirements?**

☐ No impact

☐ Some impact

☐ Significant impact

Please provide specific cost estimates if possible

22. **Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and proposes defining *large energy users* as those with an annual energy spend (purchased) of greater than $2 million per annum.**

Do you agree with this definition?

☐ Yes

☒ No

23. **If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.**

Council suggests considering organisations with an annual energy spend of greater than $1 million per annum as the target group. A $1 million per annum energy spend is still a relatively high energy spend in New Zealand and using this energy spend amount would widen the target group for engagement, reporting and action on GHG emission reduction.

Accelerating renewable energy and energy efficiency - Have your say

Section 1 - Option 1.2: Electrification information package and feasibility studies

The questions on this page relate to Option 1.2

Option 1.2 : Develop an electrification information package for businesses looking to electrify process heat, and offer EECA's business partners co-funded low-emission heating feasibility studies

25. **Do you support the proposal to develop an electrification information package?**

☒ Yes

☐ No

26. **Would an electrification information package be of use to your business?**

☒ Yes

☐ No

27. **Do you support customised low-emission heating feasibility studies?**

☒ Yes

☐ No

28. **In your view, which of the components should be scaled up and/or prioritised?**

	Scaled up	Prioritised
regularly publishing information on electricity reliability for large sites	☐	■
providing information about ways to increase reliability and resilience of electrically- supplied plant and systems	☐	■
co-funding low-emission heating feasibility studies for EECA's business partners	■	☐

29. **Would a customised low-emission heating feasibility study be of use to your business?**

☒ Yes

☐ No

30. **Please describe any components other than those identified that could be included in an information package.**

New technology can develop quickly so the information package needs to be regularly updated and easy to find on a website.

Comment on low-emission heating feasibility studies. Concentrate on electrification rather than burning wood biomass. Wood biomass for burning has GHG emissions from processing and transport to site and other environmental affects and produces GHG emissions during combustion. Preventing the combustion of fuels and associated GHG emissions into the atmosphere is the aim and not to continually add new fuel sources for combustion.

Accelerating renewable energy and energy efficiency - Have your say

Section 1 - Option 1.3: Provide benchmarking information for food processing industries

31. **Do you support benchmarking in the food processing sector?**

☒ Yes

☐ No

32. **Would benchmarking be suited to, and useful for, other industries, such as wood processing?**

☐ No

☐ Yes (please specify)

33. **Do you believe government should have a role in facilitating this or should it entirely be led by industry?**

☒ Government should have a role

☐ Should be led entirely by industry

34. **Please explain your answer**

Government should work with industry to facilitate the development of benchmarking tools. This is because Government could assist industry through the supply of resource and expertise, and alongside industry resourcing and expertise both Government and industry can collaborate to develop appropriate fit for purpose benchmarking tools that are completed in a timely manner.

Accelerating renewable energy and energy efficiency - Have your say

Section 3: Innovating and building capability

This section explains the issues around technology risk for process heat users, and the lack of viable low carbon solutions for emissions-intensive and highly integrated (EIHI) industries. It seeks your views on options to:

- **Expand Energy Efficiency and Conservation Authority's (EECA's) grants for technology diffusion and capability-building, and**
- **Collaborate with EIHI industries to foster knowledge sharing, develop sectoral low-carbon roadmaps and build capability for the future using a Just Transitions approach.**

Technology diffusion and capability-building

47. **Do you agree that de-risking commercially viable low-emission technology should be a focus of government support on process heat?**

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

Please explain your answer

48. **Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?**

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

Please explain your answer

49. **Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?**

☒ Yes

☐ No

50. **For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?**

☒ Yes

☐ No

51. **For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?**

☒ Yes

☐ No

52. **Is there a role for the Government in facilitating this?**

☒ Yes

☐ No

Please expand on your answer

Section 4: Phasing out fossil fuels in process heat

This section explains the issues around long-lived process heat investments and emissions lock-in, and seeks your views on options to:

- **Deter the development of any new coal-fired process heat, through a ban on new coal-fired process heat equipment for low and medium temperature requirements,**
- **and Require existing coal-fired process heat equipment supplying end-use temperature requirements below 100°C to be phased out by 2030.**

Deterring the development of any new fossil fuel process heat

57. **Do you agree with the proposal to ban new coal-fired boilers for low and medium temperature requirements?**

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

58. **Do you agree with the proposal to require existing coal-fired process heat equipment for end-use temperature requirements below 100 degrees Celsius to be phased out by 2030?**

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

59. **Referring to Question 57 - is this ambitious or is it not doing enough?**

☐ Ambitious

☒ Not doing enough

Please explain your answer

Should require existing coal-fired process heat equipment for end-use temperature requirements below 300 degrees Celsius to be phased out by 2030.
Should also include a timetable to phase out the use of natural gas.

Section 5: Boosting investment in energy efficiency and renewable energy technologies

This section explains the issues relating to underinvestment in energy efficiency and renewable energy technologies. It seeks your views on whether the Government should be considering these issues and how these issues could be addressed.

67. **Do you agree that complementary measures to the New Zealand Emissions Trading Scheme (NZ-ETS) should be considered to accelerate the uptake of cost-effective clean energy projects?**

☐ Strongly disagree

☐ Disagree

☐ Neither agree nor disagree

☐ Agree

☒ Strongly agree

68. **Would you favour regulation, financial incentives or both?**

☐ Regulation

☐ Financial incentives

☒ Both

☐ Neither

Please explain your answer

A well designed balance of regulation and incentives could work well together.

69. **In your view what is a bigger barrier to investment in clean energy technologies, internal competition for capital or access to capital?**

☐ Internal competition for capital

☒ Access to capital

70. **If you favour financial support, what sort of incentives could be considered?**

Capital incentives.

☐ Agree

☐ Strongly agree

79. **What changes to the NPSREG would facilitate future development of renewable energy?**

Please refer to Attachment A.

Section 9: Facilitating local and community engagement in renewable energy and energy efficiency

This section considers the barriers to greater uptake of small-scale community energy projects and potential options to facilitate community energy, including:

- **clear government position on community energy**
- **support for community energy pilot projects.**

159. **Should New Zealand be encouraging greater development of community energy projects?**

☒ Yes

☐ No

160. **What types of community energy project are most relevant in the New Zealand context?**

Initially solar, wind and battery storage for appropriate community energy projects, particularly in isolated locations.

Additional comments

An opportunity for you to provide any additional feedback.

200. **Do you have any additional feedback?**

Please refer to Attachment for our Comments pertaining to Section 7- *Enabling Development of Renewable Energy under the Resource Management Act 1991*

201. **You may upload additional feedback as a file**

Attachment A:
Section 7: Enabling Development of Renewable Energy under the Resource Management Act 1991

The following submissions address matters in the discussion document (the document) that are relevant to Christchurch City Council (the Council) functions under the Resource Management Act 1991 (RMA).[1]

The document contains proposals relating to accelerating renewable electricity generation and related infrastructure under the RMA.[2] In particular, views are sought 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
- Other options including spatial planning, pre-approval of new renewable energy developments, and amending other RMA national direction instruments.

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

The Council has made submissions on the Resource Management System review issues and options paper and many of the following submissions reflect the views expressed in those submissions.

General approach of national direction

The document contains a number of questions on each of the matters covered by the bullet points above. Many of those questions are quite broad and seek responses on the appropriate approach that should be taken. Many raise overlapping issues, so the Council submissions cover its views on the appropriate broader approach, as well as responses on specific questions. This includes the following general approach on what any national direction needs to achieve.

Provision for any development, including renewable energy generation and related infrastructure, should take into account a wide range of considerations. These include such issues as ecological, landscape and cultural values, natural hazards, and soil values. Some aspects of these issues are of national significance as recognised in the New Zealand Coastal Policy Statement, and the proposed National Policy Statements (NPSs) for Highly Productive Land, Freshwater and Indigenous Biodiversity.

The above NPSs recognise that human activity and development occurs within, and affects, the natural environment. Further that some elements of that natural environment are nationally significant and that some of those are likely to justify the setting of environmental bottom lines. There are often a number of options for achieving a development outcome in terms of location and form, possibly with differing costs, but there may be very limited or no alternative options for

[1] The discussion document contains other proposals relating to the Resource Management Act, in respect of guidance on the application of the National Environmental Standards for Air Quality to wood energy. As that technical aspect of air quality is managed by Regional Councils, no CCC comments on that aspect are included.
[2] Section 7, pages 55 – 67. https://www.mbie.govt.nz/dmsdocument/10398-section-7-enabling-development-of-renewable-energy-under-the-resource-management-act-1991

achieving nationally significant natural environment outcomes. This is particularly so in respect of scarce natural elements. An extreme example being where a development would destroy the last remaining habitat of a critically threatened indigenous species.

National direction needs to clearly reconcile competing values and needs to set environmental bottom lines where appropriate, to ensure that decisions on activities and development reflect those considerations. The national direction in the documents mentioned above seek to do that.

The Council supports the approach that the national direction, particularly NPSs, on natural elements of the environment should provide the direction on development and activities that may affect those natural elements. This enables a consistent approach to the management of development and activities based on their significance relative to the significance of the natural values covered by the NPS.

For example, as there are NPSs on electricity transmission, urban development and renewable energy generation those types of developments and activities are obviously nationally significant. That would suggest that a somewhat more permissive approach may be appropriately provided for such developments and activities in an NPS covering natural elements and values. That may not be the case where the natural value is so critical that an absolute bottom line needs to apply requiring avoidance of all development, e.g. the last remaining habitat of a critically threatened indigenous species. But where the natural value is not so critical, some nationally significant developments and activities may be acceptable where the location proposed is the most appropriate, or where it does not degrade the value below a critical threshold. The NPS may still require other development or activities that are not nationally significant to avoid that location or avoid degrading the value below a higher threshold.

National direction for renewable electricity generation

The above general approach leads to the following responses by the Council on the specific questions posed in the document relating to potential amendments to the NPSREG and other documents.

It is agreed that more specific direction on providing for renewable energy generation is required, which needs to clearly reconcile competing values and needs and set environmental bottom lines. As the document itself acknowledges the environmental effects of such activities can be significant.

However, in terms of natural elements and values in particular, this would be better achieved through the NPSs that cover the natural elements and values that may be affected by renewable energy generation. The alternative of dealing with these issues through the NPSREG risks the inconsistent achievement of nationally significant natural outcomes. A better alternative would be cross-referencing in the NPSREG to the relevant direction in the NPSs that cover the natural elements and values.

The NPSREG should provide national direction that clearly reconciles competing values and needs for other nationally significant natural elements and values not covered by other NPSs, e.g. Section 6 matters of national importance such as outstanding landscapes and features.

It also needs to reconcile other competing values that do not relate to the natural environment, particularly those that are also of national significance. For example, small-scale renewable energy generation facilities, such solar installations on house roofs may generally be appropriate within

certain limits, but may not be in the case of heritage buildings (another Section 6 matter of national importance).

In terms of the question seeking a definition or threshold for "small and community-scale renewable electricity generation activities", scale alone is not considered to be an appropriate approach to determine how such activities should be provided for. As per the example in the paragraph above, the location and the specific competing values and activities being affected should determine the appropriateness of such activities.

The document asks how the NPSREG can address local and social values. Where those values are not addressed in other NPSs/national direction, the NPSREG should include direction on how renewable energy generation should be provided for where the local community identifies significant landscape, heritage and other values.

The same approach should also apply to any electricity transmission and distribution networks for connection to renewable energy generation facilities. This should include clarification of any overlaps with the National Policy Statement on Electricity Transmission and the National Environmental Standards for Electricity Transmission Activities.

In all cases the national direction needs to be sufficiently clear so that it is possible to identify no-go locations (due to environmental bottom lines), locations that should only be considered when there is no more appropriate alternative, and locations where renewable energy generation, or certain types of renewable energy generation, are appropriate or generally appropriate (i.e. provided for respectively as permitted activities or through a resource consent application). The same approach should be taken in respect of the direction on renewing existing consents for existing renewable energy facilities.

If the national direction in the NPSREG and other documents does not clearly reconcile competing values and needs, this will shift the onus onto communities around NZ to reconcile those nationally significant issues. This will significantly increase the resources required to resolve those issues as each council has to research, justify, and take through the RMA process, proposals to manage these issues. This is also likely to result in uncertainty for communities, inconsistent planning and variable outcomes throughout the country. It is likely to result in unnecessarily long, complex and costly planning processes, including appeals to the Courts.

Identification of potential areas for renewable energy generation

The amendments to the NPSREG and other documents suggested above would direct where renewable energy generation, or certain types of renewable energy generation, are appropriate or generally appropriate and Councils would need to reflect that in their planning documents. As such, RMA planning documents would, and already do, provide a degree of spatial planning.

The Christchurch District Plan, for example, provides for various forms of renewable energy generation and electricity distribution activities as permitted activities or through more permissive resource consent types, e.g. in rural and industrial zones. The plan provision factor in values such as biodiversity and landscape. This is similar to the extent of the spatial planning example described in the document from South Australia.

It is the Council's view that this is the appropriate extent of the role of Councils "in locating and planning strategically for renewable energy resources", in terms of what should be required under the RMA.

It would not be appropriate to require Councils to undertake analysis of potential sites for a range of renewable energy generation facilities and associated electricity distribution routes. Any such obligation would impose considerable costs on communities with no certainty that there would be any take-up of those sites, and the communities may not receive benefits from such facilities that justify the costs.

The Council does, however, support the option suggested in the document of spatial planning, but on a voluntary basis. Such planning requires considerable resources. Christchurch City is in the process of developing a spatial plan and that planning would be enhanced if it included government agencies, energy sector organisations and utility providers. Such spatial planning would still need to consider natural and other values of significance. It would also require input, commitment and resources from the other agencies.

Potential NES

The comments above give an indication of the wide range of potential effects on other values that renewable energy generation facilities can have, including on other competing values and activities. A number are matters of national significance. Given the range of potential circumstances, there may be limits to the standards or requirements that can be developed and which are appropriate in all cases.

However, the Council agrees that any such standards that can be developed should be included in an NES, as this would definitely lower implementation costs, compared to all councils having to develop their own standards and establish them through the RMA process. It would also achieve more consistent outcomes across the country.

However, even if an NES is developed for renewable energy generation, this should be developed as a means of implementing an NPS(s) that provides the policy basis on how certain types of renewable energy generation should be provided for and in what circumstances.[3] As submitted earlier, developing that policy should include recognizing and resolving competing values and activities based on their significance. Doing that should clarify the type of standards that appropriately provide for those values and activities.

A number of RMA plans already include provisions for solar and wind energy generation, so consideration of an NES covering these activities would be a logical starting point.

Pre-approvals

RMA plans already effectively includes pre-approvals of activities, through the permitted activities specified in those plans and to a lesser extent, the more permissive activity status types that require resource consents . Permitted activities provide a high degree of certainty for activities where they are listed as permitted and meet the required standards. The permitted activities and the standards that apply to them, define the "envelope" of activities and effects suggested in the document.

[3] Similar to the approach being followed for the proposed national planning package for freshwater management.

If a particular form of renewable energy generation is appropriate in particular circumstances, it would be more efficient if that activity were provided for in plans as a permitted activity with appropriate standards, rather than the government, or anyone else, having to apply for a resource consent. If they are appropriate in all such circumstances throughout the country, they could be included in an NES, thereby permitting them in all plans through a single process.

It is unlikely that pre-approval of resource consents is likely to be able to be obtained where the type of activity, including the range of standards/conditions that would apply, would need to differ to reflect different circumstances.

The Council opposes Pre-approval Option C in the document, which would replace councils and local communities with government approval of resource consents. This would not ensure that local values and considerations are taken into account in assessing resource consents.