

Appendix B – Recommendations on Submissions for Energy Chapter

Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S101.004	Transpower New Zealand Limited	Interpretation	conductor	Support in part	Retain the definition of 'conductor' as notified or, alternatively, amend the definition as follows: "(a) means wire or cable used for carrying electric current along an electricity transmission line or electricity distribution line ; and (b) includes any hardware and insulation associated with the wire or cable "	Support as it consistent with the definition included in the NESETA , however, it is acknowledged that the inclusion of reference to 'transmission' means that the definition would not apply to conductors that convey electricity as part of the distribution network. For this reason, Transpower would not oppose the definition being amended to refer to an 'electricity transmission line or electricity distribution line'.	Reject
S128.016	Greenbriar Ltd.	ENRG - Energy	ENRG-Additional provisions sought	Not Stated	ENRG-03A - Where non-renewable energy is required (including provision of energy sources) on a transitional basis the effects of these activities must be managed while recognising the locational constraints and the functional and operational needs of the activities.	A separate provision recognizing the need to manage non-renewable energy generation required on a transition basis is necessary.	Accept in part
S130.028	Mercury NZ Limited	ENRG - Energy	ENRG-Additional provisions sought	Support	The development of all wind electricity generation activities shall be assessed for compliance is achieved with NZS6808:2010 Acoustics - Wind farm noise relevant	The submitter seeks to ensure NZS6808:2010 Acoustics - Wind farm noise is assessed and provided for. This is intended to be a catch all rule, which can	Accept in part

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					to amenity effects on other land uses. Where compliance is unable to be achieved activity status defers to that articulated in relevant rule.	assist with activity status. Exclusion required for smaller wind generators.	
S144.006	Contact Energy Limited	ENRG - Energy	ENRG- Additional provisions sought	Amend	The energy chapter should include provisions which relate to the management of indigenous biodiversity so that it is a standalone and comprehensive chapter for renewable energy.	Contact supports giving effect to the NPSIB but it is not apparent that the NPSIB does not apply to renewable electricity generation activities.	Reject
FS31.0010	Department of Conservation			Support in part	Allow	The D-G recognises that the NPSIB does not apply to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities (NPSIB, clause 1.3((3)). However, in terms of managing adverse effects on indigenous biodiversity, the plan will need to align with the Southland RPS objectives and policies (Chapter 16) and be consistent with the RMA, Part 2, Section 6(c) in relation to significant indigenous biodiversity and to ensure that indigenous biodiversity is maintained (Section 31(1)(b)(iii)). Clarify the	Reject

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						appropriate higher order documents that apply to renewable energy within the plan.	
FS26.017	Mercury Ltd			Support	Allow	Mercury agree that the Energy Chapter should be a standalone and comprehensive chapter for REG, including provisions relating to the management of indigenous biodiversity.	Reject
S109.026	Department of Conservation	ENRG - Energy	ENRG - General	Support in part	Retain with the following amendments (or words to similar effect): Note 1 - Include a more specific description of what other provisions apply to this chapter with references to the ECO chapter provisions. Add: Note 2 Activities below mean high water springs (MHWS) or on the beds of water bodies may require resource consent from Southland Regional Council. In relation to hydro renewable energy generation, fish passage must be maintained, or is improved, by instream structures as per the National Policy Statement for Freshwater Management 2020, the National Environmental Standards for Freshwater	The D-G recommends amending Note 1 to identify which other provisions apply to provide clarity. The D-G also recommends including a note relating to other relevant requirements outside of the District Plan including fish passage regulations to ensure that users of the Plan are aware of these regulations when looking at hydro renewable electricity generation.	Accept in Part

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					Regulations 2020 and the Southland Regional Plan.		
S136.020	Jenny Campbell	ENRG - Energy	ENRG - General	Not Stated	Renewable energy projects need to be in appropriate places with environmental effects emphasised.		Reject
S144.002	Contact Energy Limited	ENRG - Energy	ENRG - General	Support	Retain provisions relating to the development, operation, maintenance and protection of renewable electricity generation activities.	Contact supports the provisions relating to the development, operation, maintenance and protection of renewable electricity generation activities.	Accept
FS26.006	Mercury Ltd			Support	Allow	Recognising the importance of renewable electricity generation activities is consistent with achieving the nation's goals of decarbonisation and electrification of the economy.	Accept
S146.010	Southland District Council	ENRG - Energy	ENRG - General	Support in part	Align the Energy unique identifier with NPS and/ or other Councils. Consideration of energy infrastructure for generation and transmission provisions with Significant natural areas and areas of indigenous biodiversity, particularly those areas in proximity to or shared with the Southland District.	Energy- ENRG not standard National Planning Standard heading, usually bundled with infrastructure and or transport. To mitigate the impact on the Southland District, it is essential to avoid prominent ridgelines, significant natural areas, and zones of indigenous biodiversity shared with Southland District Councils. Skylines are	Reject

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						mentioned in NFL-P1(3)(a) in the case of the Hokonui Hills and visually prominent hillslopes, but this could be made more explicit as other values are directly in the ENRG chapter.	
FS24.006	Contact Energy Ltd			Oppose	Disallow	Contact oppose the relief sought as there are situations where it may be appropriate to locate energy infrastructure in the locations where the submission seeks to avoid. There should be provision for applying the effects management hierarchy in these circumstances where effects may not be able to be avoided, particularly given the national and regional significance of energy generation infrastructure.	Accept
S130.029	Mercury NZ Limited	NOISE - Noise	NOISE-Exemptions	Oppose	Noise associated with the following activities are not subject to the Rules and Standards of the Noise Chapter: Add clause 12 12. Noise effects from operation of wind electricity generation activities. Compliance is achieved through assessment of	Exclusion is sought from assessment against the objectives and policies of this chapter due to lack of consideration for the functional need of wind farms to be located where wind resources	Accept in part

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					NZS6808:2010 Acoustics - Wind farm noise ("insert rule reference" Energy Chapter -Rule ## operation of wind electricity generation activities - Noise Assessment). While the above noise sources are exempt from meeting the noise standards, any potential and actual adverse effects associated with the character, timing, duration or level of noise shall be considered for any discretionary or non-complying activity.	are. Noise, categorized as an amenity effect, should be assessed during development to ensure compliance with NZS6808:2010 Acoustics.	
FS24.052	Contact Energy Ltd			Support	Allow	Contact support the relief sought as noise generated from wind farms should be assessed in accordance with NZS6808:2010	Accept
S128.014	Greenbriar Ltd.	ENRG - Energy	ENRG-O1	Support in part	The significant local, regional and national benefits derived from the use and development of renewable energy resources are recognised and provided for and the transitional need for non-renewable energy, including the resources to provide it are recognised.	Non-renewable energy generation relies on a supply of resources. If that is not recognised the policy framework is incomplete.	Reject

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S130.010	Mercury NZ Limited	ENRG - Energy	ENRG-O1	Oppose	~~Ensure the national significance local, regional and national benefits derived from the use and development of renewable energy resources, including the benefits of Renewable Electricity Generation are appropriately provided for and the transitional need for non-renewable energy is appropriately managed.~~	Amendment required to align with concept of national significance. Acknowledgement of the national importance of REG activities, the policy framework should explicitly acknowledge the benefits of REG, including maintaining or increasing electricity capacity, managing supply security, and reducing GHG emissions. Enabling policies and rules are needed in the transition for activities related to the decarbonisation of transport and process heat are addressed within the objective by referencing national significance.	Accept in part
S121.021	Alliance Group Limited	ENRG - Energy	ENRG-O1	Support	Retain as notified	Alliance agrees that the local, regional and national benefits from the use and development of renewable energy resources are recognised and provided for.	Accept in part
FS21.021	Yrless Limited			Support	Allow	Enabling development of renewable energy improves resilience within the district,	Accept in part

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						and allows industries to better contribute towards climate change initiatives.	
S110.010	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-O1	Amend	Amend to: The significant local, regional and national benefits derived from the use and development of renewable energy resources are recognised and provided for and the transitional need for non-renewable energy is appropriately and sustainably managed.	As in the purpose of the RMA - to promote sustainable management, so resources aren't just managed, they're managed sustainably.	Accept
FS24.007	Contact Energy Ltd			Oppose in part	Disallow	While Contact recognise the importance that the effects of renewable electricity generation activities are appropriately managed, Contact oppose the inclusion of the wording 'and sustainably' managed as the benefits of the use and development of renewable energy resources should be recognised and provided for where the effects can suitably be managed	Reject
S130.011	Mercury NZ Limited	ENRG - Energy	ENRG-O2	Support	The investigation, development, operation, maintenance and	Retain. Gives effect to NPS-REG. However, further amendments are required to policies and	Accept

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					upgrading of renewable electricity generation activities is enabled.	rules to enable REG activities. Rules which require consenting for activities, which will result in increased electricity output or efficiencies need to be justified from an effects perspective.	
S121.022	Alliance Group Limited	ENRG - Energy	ENRG-O2	Support	Retain as notified	Alliance agrees that works associated with renewable activities are enabled.	Accept
FS21.022	Yrless Limited			Support	Allow	Enabling development of renewable energy improves resilience within the district, and allows industries to better contribute towards climate change initiatives.	Accept
S109.022	Department of Conservation	ENRG - Energy	ENRG-O3	Support	Retain as notified	The D-G supports this objective which seeks to manage effects from electricity generation activities on the environment and the underlying relationship Ngāi Tahu hold with the natural environment.	Accept in part
S128.015	Greenbriar Ltd.	ENRG - Energy	ENRG-O3	Support in part	ENRG-O3 - Effects from electricity generation activities on communities, the environment and the underlying relationship Ngāi Tahu hold with the natural environment are managed, while recognizing practical	This provision only addresses renewable energy supply when it should address both renewable and non-renewable.	Reject

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					constraints (eg, technical, locational, operational) from the use and development of renewable energy, including renewable energy and materials to produce non-renewable sources of energy.		
S139.042	Hokonui Rūnanga Inc	ENRG - Energy	ENRG-O3	Support in part	Amend Clause 3 to read: Effects from electricity generation activities on people and communities, and the environment and the underlying relationship Ngāi Tahu hold with the natural environment are managed, while recognising practical constraints (eg, technical, locational, operational) from the use and development of renewable energy; and The whakapapa relationship of mana whenua with the whenua (land) and wai (water) is recognised and potential effects on mauri, wāhi tapu, mahinga kai and the ability to offer manaakitanga, mātauranga associated with the current landscape, and the exercise of kaitiakitanga are avoided, remedied or mitigated; including any adverse visual or amenity effects.	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Accept in part

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FS26.007	Mercury Ltd			Support in part	Allow in part	Mercury supports Hokonui Rūnanga Inc relief which seeks that wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed (refer above). In terms of the amendments to the policy, Mercury supports the first part of the draft policy but is concerned the reference to "including" drills into an issue better addressed in other policies and seek that part be deleted: including any adverse visual or amenity effects.	Accept
S121.023	Alliance Group Limited	ENRG - Energy	ENRG-O3	Support	Retain as notified	Alliance agrees that effects from electricity generation should be managed, while recognising practical constraints with the use and development of renewable energy.	Accept in part
FS21.023	Yrless Limited			Support	Allow	Recognises the importance of infrastructure to communities.	Accept in part

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S130.063	Mercury NZ Limited	ENRG - Energy	ENRG-O3	Oppose	Effects from use and development of renewable energy resources ~~electricity generation activities~~ on communities, the environment and the underlying relationship Ngāi Tahu hold with the natural environment are managed, while ~~recognising~~ acknowledging practical constraints, including, technical and functional needs , ~~locational, operational from the use and development of renewable energy~~	Changes give effect to the NPS-REG 2011 and correct matters. The District Plan needs explicit acknowledgment of the need to located where energy resources are located. This is assists with balancing adverse effects. Have referred to defined terms technical need, functional need, which cover locational and operational constraints.	Accept in part
FS24.008	Contact Energy Ltd			Support	Allow	Contact support the relief sought as this change gives effect to the NPS-REG	Accept in part
S115.059	Kevin Robertson	ENRG - Energy	ENRG-O4	Support in part	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.	This objective should reference safety as well as efficiency in operation.	Accept
S143.070	Rural Ratepayers Group	ENRG - Energy	ENRG-O4	Support in part	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.	This objective should reference safety as well as efficiency in operation.	Accept

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S148.071	Alistair & Bernadette Hunt	ENRG - Energy	ENRG-O4	Support in part	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.	This objective should reference safety as well as efficiency in operation.	Accept
S60.061	Ronald Crispin	ENRG - Energy	ENRG-O4	Support in part	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.	This objective should reference safety as well as efficiency in operation.	Accept
S68.179	John Baynes	ENRG - Energy	ENRG-O4	Support in part	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.	This objective should reference safety as well as efficiency in operation.	Accept
S130.012	Mercury NZ Limited	ENRG - Energy	ENRG-O4	Support	Retain.		Accept in part
FS27.002	Alliance Group Limited			Support	Allow	Agree. It is important that the operation, maintenance and upgrading of existing electricity generation activities is not constrained	Accept in part

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S126.058	Southland Federated Farmers of New Zealand	ENRG - Energy	ENRG-O4	Support in part	Amend ENRG-O4: The safe and efficient operation, maintenance and upgrading of existing electricity generation activities is not constrained or compromised by reverse sensitivity effects.	This objective should reference safety as well as efficiency in operation.	Accept
FS26.008	Mercury Ltd			Support	Allow	Mercury supports the addition of reference to safety in this energy policy	Accept
S110.008	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-Overview	Amend	Amend to: The Gore District has the potential to provide for large scale energy production utilising wind. The district also contains substantial lignite reserves. However, the adverse environmental effects arising from its extraction , production and use, particularly its contribution to climate change, rules out the development of lignite under current technology.	The environmental effects of lignite extraction need to be highlighted, as these can be devastating, especially to water bodies.	Accept
S110.009	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-Overview	Amend	The location of renewable electricity generation facilities is often driven by their functional need and operational need to access renewable energy resources. With wind for example, suitable sites are located on exposed	While Forest & Bird supports the increased use and development of renewable energy types, there is a need for the energy development to be appropriately located taking	Accept

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					ridge lines where there is a constant wind. This limits the geographic areas where renewable electricity generation activities can occur. Logistical or technical practicalities, and the need to integrate with existing supporting infrastructure, may also place constraints on the location of these activities, as does potential effects on natural landscape, amenity, biodiversity and ecosystems.	account of biodiversity, environmental, landscape and social factors. The potential effects on natural landscape, amenity, biodiversity and ecosystems need to be considered. Renewable electricity generation facilities placed in the wrong area/s can have a devastating effect to the environment and indigenous biodiversity. Due to this, their potential locations are often constrained.	
S128.013	Greenbriar Ltd.	ENRG - Energy	ENRG- Overview	Support in part	Energy is required to meet the day-to-day needs of people and communities, and to facilitate social, cultural and economic activities. Agriculture and other primary production which is the dominant land use within the District has high energy demands associated with processing of food and fibre. Development and use of renewable energy resources is becoming increasingly important as a way of meeting future energy demand in an environmentally sustainable manner. ... The Gore District has the potential	Recognizes Lignite reserves, but not other Coal. Not clear why this approach has been taken. The Overview does not address the importance of energy to support key sectors for the District, particularly agriculture and the current utilization of Coal to support this production. There is also a need to recognise the functional and locational constraints associated with energy resources.	Reject

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					to provide for large scale energy production utilising wind. The District also contains substantial ~~coal and lignite~~ reserves. ~~However, the adverse environmental effects arising from its production and use, particularly its contribution to climate change, rules out the development of lignite under current technology.~~ It is preferable, where non-renewable energy sources need to be utilised that they are sourced as close to where they are needed as possible, whilst also to recognising that they are locatonally constrained. Small scale electricity generaton is utilised in the District using solar, water and wind sources. Coal, including lignite, remains a significant source of home heatng and provides energy to large scale production facilites within Gore District and the wider Southland Region. The Southland Regional Air Plan includes provisions providing for a transiton away from this energy source to improve air quality. Factors such as emissions reducton targets under the Climate Change Response legislaton are alsolikely to result in reduced reliance on		

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					nonrenewable energy generation over time. Although, there will still be certain situations where it may need to be retained. The location of renewable electricity generation facilities is often driven by their functional need and operational need to access renewable energy resources. With wind for example, suitable sites are located on exposed ridge lines where there is a constant wind. This limits the geographic areas where renewable electricity generation activities can occur. Logistical or technical practicalities, and the need to integrate with existing supporting infrastructure, may also place constraints on the location of these activities. Sources of material for non-renewable energy generation are locationally constrained.		
S110.089	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG- Overview	Amend	Amend to: Adverse environmental effects, including discharges to air, visual impacts, ~~and~~ noise, and indigenous biodiversity among others can arise from the investigation, development and utilisation of both renewable and	The full range of biodiversity and ecological effects need to be adequately considered. For example, with wind farms, this would include not just the location of the turbine sites, but also the roading, electricity	Reject

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					non-renewable energy resources. Equally, the development and use of energy resources, including the generation of electricity, can be compromised by the location of incompatible land uses.	distribution network/infrastructure, the location of the spoil, the source of water for concrete/dust suppression, gravels and other materials, emissions, the energy costs of building the facility, etc. Renewable electricity generation facilities placed in the wrong area/s, and without adequate assessment of their wider scale and cumulative effects, can have a devastating effect to the environment.	
FS31.009	Department of Conservation			Support	Allow	The D-G supports the use of renewable energy however there is a need to consider and manage adverse effects on indigenous biodiversity as well as other environmental effects. Support this submission.	Reject
S121.024	Alliance Group Limited	ENRG - Energy	ENRG-P1	Support	Retain as notified	Alliance agrees that renewable electricity generation capacity and local security of supply should be maintained.	Accept in part

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S130.013	Mercury NZ Limited	ENRG - Energy	ENRG-P1	Support in part	Recognise the ~~local, regional and national~~ benefits of renewable electricity generation activities including, but not limited to: 1. maintaining or increasing electricity generation capacity while avoiding, reducing or offsetting greenhouse gas emissions; 2. maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation; 3. using renewable natural resources rather than finite resources, which requires transition away from fossil fuels. 4. the reversibility of the adverse effects on the environment of some renewable electricity generation technologies; and 5. avoiding reliance on imported fuels for the purposes of generating electricity.	REG benefits are nationally significant as electricity supply must meet national demand to ensure national security of energy is not compromised. The submitter supports the transition from fossil fuels, processing heat and transport need specific acknowledgment in policy settings. Is acknowledged in the NPS-REG 2011 and Southland Murihiku Regional Energy Strategy 2022-2050.	Accept
S110.011	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-P1	Amend	Add: 6. reducing emissions and contribution to climate change	Renewable energy has less emissions than fossil fuels, therefore recognising this as a benefit, and its reduced contribution to climate change, should be highlighted.	Reject

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FS26.009	Mercury Ltd			Support in part	Allow in part	Support recognising the benefits of renewable energy as set out in the NPS-REG 2011. The suggested amendment however misses context before "contribution to climate change" and "reducing emissions" duplicates ENRG-P1 (1). The point needs to be redrafted to address the benefits of reducing GHG in addressing climate change.	Accept
S128.019	Greenbriar Ltd.	ENRG - Energy	ENRG-P10	Support	No amendments required	Support the importance of ensuring resilient energy supply. This includes the pipeline of energy sources.	Accept
S130.021	Mercury NZ Limited	ENRG - Energy	ENRG-P10	Oppose	Recognise the need for resilient - critical infrastructure, which is interdependent on other critical infrastructure, including energy supply which must function during ~~including standby power generation in~~ emergency situations, emergency response may also need, and stand-alone power systems, to mitigate outage risk where other sources are not available.	Proposed not clear in how off grid energy supply helps resilience from a network perspective.	Reject

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S110.012	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-P11	Amend	Add: 10. adverse effects on indigenous biodiversity and the ecosystems that support them	Large scale renewable energy activities and the location of structures and the infrastructure supporting them, can potentially cause devastating effects to indigenous biodiversity through loss of habitat, vegetation clearance, bird/bat strike (with turbines and power cables) and so on. Therefore, in order to ensure sustainable development, adverse effects on indigenous biodiversity and ecosystems must be considered when locating large scale renewable energy.	Reject
S121.027	Alliance Group Limited	ENRG - Energy	ENRG-P11	Amend	ENRG-P11 Require large scale renewable electricity generation activities to demonstrate they are located appropriately having regard to relevant land use zone, also considering the following: (...) 7. adequate separation distances from sensitive activities and, where not already located within an identified Outstanding Natural Feature overlay , Outstanding Natural	Alliance operates a hydro-electric scheme on the Mataura River adjacent the Plant. The hydro-electric plant can generate 530 kW/h of renewable electricity and consequentially supplies a significant proportion of the Plants electricity. Structures associated with this scheme are likely to have been in place since the 1920's or 1930's. The	Reject

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					Features and Landscapes to ensure conflict and reverse sensitivity effects are minimised;	hydro-electric plant is located within the Mataura Falls ONF overlay. The Mataura Falls has been identified in Appendix 5 of the Proposed Plan as a ONF despite the presence the weir and the water races associated with the hydroelectric plant. Alliance seeks that this policy be amended to reflect this.	
S130.022	Mercury NZ Limited	ENRG - Energy	ENRG-P11	Oppose	~~Require~~ large scale renewable electricity generation activities are provide for in the General Rural Zone, or required to demonstrate they are ~~located~~ appropriately having regard to relevant land use zone, also considering the following: 1. any practical constraints, including functional, or technical needs logistical or technical constraints to developing, upgrading, operating or maintaining the activity, including essential activities such as distribution to the national grid; 2. effects on existing infrastructure; ~~the location of existing structures and infrastructure including, but not limited to, roads, navigation and telecommunication structures and~~	Gives effect to NPS-REG 2011. Function and technical needs are defined terms. Sensitive activities are defined.	Accept in part

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					facilities, and connections to distribution networks, and the efficient use of land; 3. the scale, intensity, duration or frequency of the activity's effects; 4. the design and site layout of the activity and its ability to internalise effects; 5. earthworks and construction effects; 6. adverse amenity effects, including but not limited to visual, traffic generation, safety, light spill, shadow and noise effects; 7. effects on adequate separation distances from sensitive activities and Outstanding Natural Features and Landscapes to effects acceptable ensure conflict and reverse sensitivity effects are minimised. 7. effects on significant environmental values, such as Outstanding Natural Features and Landscapes 8. use of adaptive management measures through monitoring of adverse effects; and 9. Ngāi Tahu cultural values, including those listed in MW2.3.		

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FS27.008	Alliance Group Limited			Oppose in part	Disallow in part	Proposed (as submitted) amendment to direct REG to the General Rural Zone is not necessary or appropriate. Point 1: The NPS-REG refers to "logistical or technical practicalities" (Policy C1(b)). Rewording should use this for consistency. Point 2: Should retain reference to "location of existing structures and infrastructure", but agree list of inclusions is not necessary. Point 4: Proposed deletion not appropriate (removes effects-based reason to consider site layout and design). Point 7: Agree Reference to "significant environmental values" (As submitted) is better than the simplistic "separation distance" (as notified).	Accept in part
FS24.013	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it gives effect to the NPS-REG and recognises the operation and functional need of renewable electricity activities, including the need to	Accept in part

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						be located near the National Grid.	
FS24.014	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it is consistent with the NPS-REG	Accept in part
S109.024	Department of Conservation	ENRG - Energy	ENRG-P11	Support in part	Retain with amendments as follows (or words to similar effect): Require large scale renewable electricity generation activities to demonstrate they are located appropriately having regard to relevant land use zone, also considering the following: (...) x. best practice techniques for managing adverse effects on highly mobile fauna and their habitats; 4. the design and site layout of the activity and its ability to internalise effects; 5. earthworks and construction effects; 6. adverse amenity effects, including but not limited to visual, traffic generation, safety, light spill, shadow and noise effects; 7. adequate separation distances from sensitive activities, SNAs or unmapped areas identified as SNAs in accordance with the criteria in Appendix 4 specified highly mobile fauna areas, riparian margins and Outstanding Natural	It is important to assess whether large scale renewable electricity generation is in the appropriate location. It is recommended that separation distances from SNAs and riparian margins is also considered. Specific reference to highly mobile fauna should be included, to give effect to cl 3.20(3) in the NPSIB.	Reject

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					Features and Landscapes to ensure conflict and reverse sensitivity effects are minimised; (...)		
FS26.012	Mercury Ltd			Oppose	Disallow	Mercury opposes the reference to unmapped SNA's.	Accept
FS24.012	Contact Energy Ltd			Oppose	Disallow	The submission seeks to make amendments to this policy to give effect to the NPS-IB, however, Contact note that the NPS-IB does not apply to renewable electricity generation activities (refer to Clause 1.3(2)), and as such, the amendments sought are inappropriate for the provisions in the Energy chapter and should not be allowed.	Accept
S130.023	Mercury NZ Limited	ENRG - Energy	ENRG-P12	Oppose	~~Encourage~~ Provide for innovation and flexibility for new and existing renewable electricity generation activities to adopt new technologies and sources of renewable energy where this: 1. Increases the efficient use of renewable energy resources; or 2. Encourages the re-use of structures and associated infrastructure where appropriate; or	Recognises benefits of REG and gives effect to NPS-REG.	Accept in Part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					3. Increases the resilience, safety or reliability of renewable electricity generation activities; or 4. Results in environmental benefits and enhancements. Or 5. Increases electricity generation capacity, or increases security of electricity supply		
FS27.009	Alliance Group Limited			Support	Allow	Agree "Provide for" is stronger and more appropriate than "Encourage".	Accept
S121.025	Alliance Group Limited	ENRG - Energy	ENRG-P2	Support	Retain as notified	Alliance is activity working to decarbonize its business, including by generating and using solar, waste products and gas discharges to provide renewable energy.	Accept in part
S130.014	Mercury NZ Limited	ENRG - Energy	ENRG-P2	Oppose	~~Encourage and facilitate~~ Provide for the increased use and development of renewable energy resources including the use of: 1. wind, solar and hydro; and 2. waste products; and 3. gas discharges as a source of energy production.	Proposed amendments align with NPS-REG. "Encourage" and "facilitate" lack the support for decarbonization of NZ's economy.	Accept

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FS27.003	Alliance Group Limited			Support	Allow	Proposed (as submitted) change to "Provide for" is an appropriate strengthening of the policy.	Accept
FS24.009	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it is consistent with the NPS-REG and recognises the significance of the development of renewable electricity generation activities.	Accept
S130.015	Mercury NZ Limited	ENRG - Energy	ENRG-P4	Support	~~Support~~ Recognise and provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation.	Amendment gives effect to NPS-REG. Rules need to 'provide for' REG activities. 'Support' lacks the support for decarbonization of NZ's economy.	Accept
FS27.004	Alliance Group Limited			Support	Allow	Proposed (as submitted) change to "Provide for" is an appropriate strengthening of the policy.	Accept
S121.026	Alliance Group Limited	ENRG - Energy	ENRG-P5	Support	Retain as notified	Alliance agrees that it is appropriate to provide for these activities while managing environmental and cultural effects	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S130.016	Mercury NZ Limited	ENRG - Energy	ENRG-P5	Support	Retain.		Accept
S125.010	Ministry of Education	ENRG - Energy	ENRG-P6	Support	Retain as proposed.	The submitter supports ENRG-P6, acknowledging potential and actual effects these facilities may have on its assets. Proposed ENRG-P6 provides appropriate protection from adverse effects of renewable electricity generation by managing adverse environmental or cultural effects.	Accept
S130.017	Mercury NZ Limited	ENRG - Energy	ENRG-P6	Support	Retain.		Accept
FS27.005	Alliance Group Limited			Support	Allow	Alliance agrees that it is appropriate to provide for these activities while managing environmental and cultural effects	Accept
S128.017	Greenbriar Ltd.	ENRG - Energy	ENRG-P7	Support in part	ENRG-P7 Avoid the location of renewable and non-renewable electricity generation activities within the following areas unless adverse effects can be mitigated: 1.	It is unclear what the areas of indigenous Biodiversity is intended to cover given significant natural areas are	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					outstanding natural features and landscapes 2. significant natural areas ~~3. areas of indigenous biodiversity~~	also included. This creates uncertainty.	
S130.018	Mercury NZ Limited	ENRG - Energy	ENRG-P7	Oppose	Provide for Avoid the location of renewable and non-renewable electricity generation activities whilst managing within the following areas unless adverse effects can be remedied, mitigated, or residual effects offset or compensated: 1. outstanding natural features and landscapes 2. significant natural areas ~~3. areas of indigenous biodiversity~~	Avoidance is not suitable in the renewable policy section; corresponding policies are necessary to manage effects on nationally significant values. Applying the same policy test for renewables and non-renewables to manage effects isn't logical given the importance of decarbonizing NZ's economy. The submitter seeks effects on biodiversity are managed in accordance with the effect hierarchy. It is unclear what "areas" of indigenous biodiversity or why an avoidance approach is justified from an RMA perspective.	Accept in part
FS27.006	Alliance Group Limited			Support	Allow	Alliance agrees that "avoidance" in relation to renewable energy is too strong.	Accept in part
S109.023	Department of	ENRG - Energy	ENRG-P7	Support in part	Retain with amendments as follows (or words to similar effect): Avoid	The D-G supports the inclusion of this policy and managing	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	Conservation				the location of renewable and nonrenewable electricity generation activities within the following areas unless adverse effects can be mitigated managed by applying the effects management hierarchy: 1. outstanding natural features and landscapes 2. significant natural areas 3. areas of indigenous biodiversity 4. areas of highly specified mobile fauna 5. riparian margins	adverse effects on the identified areas but considers it relevant to manage adverse effects by applying the effects management hierarchy rather than just through mitigation of effects. Applying the same approach and drafting to REG as for other activities would provide more clarity and certainty in respect of the provisions, and more consistency and integration in terms of how the effects of activities on indigenous biodiversity are managed. It is considered that applying an effects management hierarchy to REG is justified in terms of Gore's biodiversity values and threats, and under sections 6(c) and 31(1)(b)(iii) of the Act.	
FS26.0010	Mercury Ltd			Oppose	Disallow	Points 2, 3, 4 and 5 overlap and should be consolidated. The effects management hierarchy ("EMH") should apply to significant natural areas / indigenous biodiversity only, not ONL/ONF's. Reference to	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						EMH and the principles for biodiversity offsetting and compensation should be consistent with the approach in the NPS-IB, noting the REG exemption contained in clause 1.3 (3) for renewable electricity generation.	
FS24.0010	Contact Energy Ltd			Oppose in part	Disallow	Contact opposes the relief sought to include areas of highly specified mobile fauna and riparian margins in this policy as references to these are too broad and could have consequences on the development of renewable electricity generation activities as these areas are not mapped on the District Plan Maps and could be widespread.	Accept
S144.004	Contact Energy Limited	ENRG - Energy	ENRG-P7	Oppose in part	Consistency with NPSREG.	Contact is concerned this policy is not consistent with the NPSREG as it seeks to avoid certain areas in the district. References to SNA's and areas of indigenous biodiversity may be too broad.	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS26.011	Mercury Ltd			Support	Allow	Mercury agrees this policy is not consistent with the NPSREG 2011. Matters of national importance under s6b of the RMA requires the protection of ONL/ONF's from inappropriate development (emphasis added). Further consideration should be given to the drafting of the references to SNA's and areas of indigenous biodiversity to improve clarity.	Accept
S101.014	Transpower New Zealand Limited	ENRG - Energy	ENRG-P8	Support in part	Amend Policy ENRG-P8 as follows: "ENRG-P8 Protect electricity generation activities-, ~~transmission~~ and associated infrastructure and undeveloped energy resources from reverse sensitivity effects from incompatible subdivision, land use and development."	Transpower does not oppose Policy ENRG-P8, but considers that reference to electricity transmission in this Policy is not necessary and may give rise to inconsistent provisions within the Energy, Infrastructure and Transport Chapter. This is because, effects on electricity transmission activities and assets are managed by the provisions in the INFR Sub-Chapter.	Reject
S128.018	Greenbriar Ltd.	ENRG - Energy	ENRG-P8	Amend	Amendments to ensure non-renewable energy sources are included.	Clarity is sought about what is captured by 'undeveloped energy resources'. But the intent of the provision is	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						supported. It is submitted that it should include both the existing generation systems, and the resources that are required to provide energy. Support subject to clarification that 'energy resources' includes nonrenewable energy sources' If that is not the case then provision is opposed and amendments are required.	
S130.019	Mercury NZ Limited	ENRG - Energy	ENRG-P8	Support in part	Delete ENRG-P8 to be new policy in General Rural Zone Chapter. Protect electricity generation activities, transmission and associated infrastructure and undeveloped renewable energy resources from reverse sensitivity effects from incompatible subdivision, land use and development.	Support the intent of policy. Needs to be relocated, or duplicated in GRZ chapter which will manage development and land use activities, which may be sensitive to effects from REG activities and development.	Reject
FS27.007	Alliance Group Limited			Oppose	Disallow	The policy needs to apply in all zones, not just the General Rural Zone. It is best kept in district-wide energy chapter.	Accept
S130.020	Mercury NZ Limited	ENRG - Energy	ENRG-P9	Not Stated	When considering any residual environmental effects arising from the use and development of energy	Gives effect to NPS-REG 2011 and the need to consider national significance, functional	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					resources that cannot be avoided, remedied or mitigated, regard may be had to offsetting measures or compensation, including: 1. measures which benefit the local environment; and 2. measures which benefit the local community affected; and 3. measures which benefit mana whenua aspirations or projects. 4. Practical constraints, including functional and technical needs 5. Benefits of Renewable Electricity Generation, including maintaining or increasing generation capacity and security of electricity supply, as well as the reduction in use of finite resources.	and operational needs of REG activities.	
FS24.011	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it seeks to consider the functional and operational need of renewable electricity generation activities and is consistent with the NPS-REG.	Accept in part
S109.025	Department of Conservation	ENRG - Energy	ENRG-R1	Support in part	Retain with the following amendments (or words to similar effect): Activity Status: Permitted Where 1. All Energy Standards are complied with; and 2. No structure or	Applying the same approach to the drafting of REG as for other activities would provide more clarity and certainty in respect of the provisions, and more	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					building is located in an Outstanding Natural Feature or Landscape or SNA or unmapped SNA that has been assessed as significant against the criteria in Appendix 4; and 3. (...)	consistency and integration in terms of how the effects of activities on indigenous biodiversity are managed. The D-G therefore recommends that the rule is amended to include SNAs or unmapped SNA areas as a trigger that requires resource consent and for small scale REG within an SNA, the activity status becomes Discretionary. The D-G also recommends the definition for 'renewable electricity generation activities - small scale' in the Interpretation Chapter should be extended to 'renewable electricity generation activities - small and community scale' (see previous submission) so that is aligns with the heading in ENRG-R1.	
FS26.013	Mercury Ltd			Oppose	Disallow	Mercury opposes the relief that seeks to reference unmapped SNA's. This introduces uncertainty and is not appropriate in a permitted activity standard	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S110.013	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-R1	Amend	Amend: 2. No structure or building is located in an Outstanding Natural Feature or Landscape, and/or a Significant Natural Area ; and	There is no requirement in the plan to avoid SNAs. The addition of this rule would ensure that SNAs are protected.	Reject
FS26.014	Mercury Ltd			Support in part	Allow in part	It would be clearer if the reference to SNA's was added as a separate number in the list rather than and/o	Reject
S121.028	Alliance Group Limited	ENRG - Energy	ENRG-R2	Oppose	Clarify that the hydro-electric plant would not meet the definition of a 'renewable electricity generation activities - large scale'. If it does; either exempt it from the definition or introduce a permitted activity or controlled activity rule for the operation, maintenance, repair and upgrade of the Mataura Hydro-Electric Plant or suitable alternative relief.	Alliance operates a hydro-electric scheme on the Mataura River. If the hydro-electric scheme is considered to be 'renewable electricity generation activities - large scale' and because the scheme is not located in the Rural Zone, any maintenance, operation, repairs, or upgrading of the scheme would require consent as a non-complying activity. As a first point Alliance queries whether the definition of a 'renewable electricity generation activities - large scale' would apply to the hydro-electric plant given that its primary purpose is to provide electricity to the Plant. If the	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						definition does apply, a non-complying activity status is not appropriate for activities associated with an existing renewable electricity generation scheme, does not reflect the outcome sought by ENRG-02 or National Policy Statement for Renewable Electricity Generation 2011 Policy E2 which requires district plans to provide for the operation, maintenance and upgrading of existing hydroelectricity general activities.	
S130.025	Mercury NZ Limited	ENRG - Energy	ENRG-R2	Oppose	Amend Activity status: ~~Non-Complying~~ Discretionary	The submitter is concerned distribution or essential activities outside of core wind sites may be constrained unnecessary.	Reject
S130.024	Mercury NZ Limited	ENRG - Energy	ENRG-R2	Oppose	Split into three rules: Rule ENRG-R2 General Rural Zone Activity status: Discretionary New Large-Scale Renewable Electricity Generation construction, development and operation, maintenance, repairs and upgrading	The submitter supports a specific rule for large scale REG development. Activity status is restrictive and should align with the NPS-REG and proposed ENRG objective and policies. Buildings are structures. Should reference NZS 6808: 2010.	Accept in part

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					(including any associated structures) ~~and associated buildings.~~ General Rural Zone Activity status: Permitted New Rule ENRG-R2.2 Maintenance and upgrading of existing Large-Scale Renewable Electricity Generation structures where replacement of like for like and same locations. General Rural Zone Activity status: Controlled New Rule ENRG-R2.3 Upgrading of large-Scale Renewable Electricity Generation, including repowering of wind farms, including replacement of any structures with less than 10% increase in envelope. Matters of control are limited to: 1.construction impacts, and 2.increased operational effects, from greater scale and bulk, including amenity noise effects and compliance with NZS 6808: 2010 (Acoustics - Wind Farm Noise), or any effects on scheduled significant values N		
FS27.0010	Alliance Group Limited			Support in part	Allow in part	Agree that specific rule for existing Large Scale Renewable Electricity Generation	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						structures is appropriate, but this should be district-wide and not restricted to just the General Rural Zone.	
FS11.053	Heritage New Zealand Pouhere Taonga			Oppose	Disallow	HNZPT acknowledges that the dominant land use within the district is agriculture and that the District Plan needs to enable sustainable primary production within appropriate zones. The previously stated activities will involve earthworks and land disturbance during establishment, maintenance, and use, which may affect identified and unknown archaeological sites. As stated in one of the submissions lodged, activities such as fencing require a significant amount of earthworks to provide a buffer for vegetation and allow heavy vehicle access for establishment and maintenance. Ongoing agricultural land use in areas that have undergone previous soil disturbance, such	Accept in part.

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						as ploughing, tilling, etc., are unlikely to encounter archaeology. However, earthworks or ground disturbance to areas that have been previously undisturbed, or go below the topsoil have the potential to uncover archaeology. Activities within these areas should have sufficient triggers in the District Plan to create awareness of the plan users' potential obligation under the archaeological provisions of the HNZPTA. For activities involving significant volumes of earthworks, such as quarries, mines, commercial forestry, and renewable electricity generation activities, or areas that have been largely undisturbed, such as significant natural landscapes or features, the effects on archaeology require assessment and a permitted activity status is not appropriate.	

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S144.003	Contact Energy Limited	ENRG - Energy	ENRG-R2	Oppose in part	Contact supports the discretionary status of large scale renewable electricity construction operation, maintenance, repairs and upgrading activities in the General Rural Zone and opposes the non-complying status for such activities in all other zones.	A non-complying status is too onerous and is not consistent with the NPS-REG and Southland Policy Statement.	Reject
FS26.015	Mercury Ltd			Support	Allow	Mercury agrees that a noncomplying status is too onerous and is not consistent with the NPSREG and Southland Policy Statement	Reject
S130.026	Mercury NZ Limited	ENRG - Energy	ENRG-R3	Oppose in part	Renewable Electricity Generation Investigations, including associated structures and buildings General Rural Zone Activity status: Permitted Where: 1. All Energy Standards are complied with. ~~2. Associated structures and buildings are temporary and removable.~~	Aligned with NPS-REG,	Reject
S109.027	Department of Conservation	ENRG - Energy	ENRG-S1	Support in part	Retain with the following amendments (or words to similar effect): Matters of discretion: 1. The type, scale, form and location of the turbine and any adverse effects on the character, amenity, indigenous	In line with Objective 3 and Policy 7, the D-G recommends that the Restricted Discretionary matters are amended to consider any adverse effects on the	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					biodiversity values or Ngāi Tahu cultural values of the locality	indigenous biodiversity values of the locality including SNA's and threatened and at risk species habitats. This is considered necessary in terms of Gore's biodiversity values and threats, and under sections 6(c) and 31(1)(b)(iii) of the Act.	
S110.014	Royal Forest and Bird Society of NZ Inc	ENRG - Energy	ENRG-S1	Amend	Add: 5. a comprehensive ecological assessment must be completed by a suitably qualified person. 6. No structure is to be located in a Significant Natural Area	An ecological assessment must be undertaken to identify any SNA that may exist on the site. There is no requirement in the plan to avoid SNAs. The addition of this rule would ensure that SNAs are protected.	Reject
S139.043	Hokonui Rūnanga Inc	ENRG - Energy	ENRG-S1	Support in part	Make consequential amendments to align with the amendments sought for ENRG-O3.	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Accept
S109.028	Department of	ENRG - Energy	ENRG-S2	Support in part	Retain with the following amendments (or words to similar effect): Matters of discretion: ... 4.	In line with Objective 3 and Policy 7, the D-G recommends that the Restricted	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
	Conservation				Adverse effects on Ngāi Tahu cultural values, including those listed in MW2.3 5. Adverse effects on indigenous biodiversity values and riparian margins	Discretionary matters are amended to consider any adverse effects on the freshwater values of the locality. This is considered necessary in terms of Gore's biodiversity values and threats, and under sections 6(c) and 31(1)(b)(iii) of the Act.	
S139.044	Hokonui Rūnanga Inc	ENRG - Energy	ENRG-S2	Support in part	Make consequential amendments to align with the amendments sought for ENRG-O3.	Wherever possible the plan provisions should specify the particular effects of concern to mana whenua to ensure the plan provisions are clear and that appropriate effects are identified and assessed, including when Hokonui Rūnanga Inc may be an affected party.	Accept
S109.029	Department of Conservation	ENRG - Energy	ENRG-S4	Support in part	Matters of discretion: 1. The type, scale, form and location of the turbine and any adverse effects on indigenous biodiversity values including threatened and at risk species and their habitats , the character and amenity values of the locality.	In line with Objective 3 and Policy 7, the D-G recommends that the Restricted Discretionary matters are amended to consider any adverse effects on the indigenous biodiversity values of the locality. This is considered necessary in terms of Gore's biodiversity values	Reject

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						and threats, and under sections 6(c) and 31(1)(b)(iii) of the Act.	
FS26.016	Mercury Ltd			Oppose in part	Disallow in part	The matter of discretion refers to "turbine". Mercury seeks tailored matters of discretion are tailored to wind monitoring masts. The wording should be consistent with the policy direction and any addition should be a separate matter (i.e. after point 5).	Accept
FS24.015	Contact Energy Ltd			Oppose	Disallow	Contact opposes the relief sought as it is inconsistent with the NPS-REG and exploratory wind monitoring masts should be appropriately provided for.	Accept
S130.027	Mercury NZ Limited	ENRG - Energy	ENRG-S4	Oppose in part	The matters of discretion appear to relate to wind turbines rather than wind monitoring masts. Exploratory wind generation ~~monitoring~~ masts 1. The minimum setback from the site boundary is at least 10 times the mast's height. a distance equal to the height of the mast from the boundary of any site in different ownership. 2. The Maximum duration of	Amendment required to give effect to NPS-REG. Exploration of wind resource requires wind monitoring masts to establish a robust data set. Wind monitoring masts are temporary and are typically approximately 100m. No need to require 10 times the height, which is not an enabling framework.	Accept in part

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					monitoring mast is in place activity is five years 3. Removal of mast and all associated structures and equipment must be undertaken no later than two months after the cessation of wind monitoring activities. 4. Monitoring mast is maximum 100m in height Activity status where compliance is not achieved: Restricted Discretionary Matters of discretion: ~~1. The type, scale, form and location of the turbine and any adverse effects on the character and amenity values of the locality.~~ 1. The height and location of the mast(s); 2. The ability to mitigate any adverse visual amenity effects through ~~use of screening, planting and alternative siting~~ and design. ~~3. Adverse noise and vibration effects.~~ 4. Adverse effects on Ngāi Tahu cultural values, including those listed in the MW2.3 5. Operational need, functional need or other technical considerations.		

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
FS24.016	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it ensures consistency for the development of wind farms and provides greater clarity.	Reject
S130.043	Mercury NZ Limited	GRUZ - General Rural Zone	GRUZ- Additional provisions sought	Not Stated	Insert new objective: Renewable Electricity Generation Activities and Transmission Enable the operation, use, development and upgrading of renewable electricity generation activities and transmission within the rural environment	It is required to give effect to NPS-REG. REG activities have a functional need to locate where energy resources are located.	Reject
FS24.059	Contact Energy Ltd			Support	Allow	Contact support the relief sought as it is consistent with the NPS-REG.	Reject
S95.029	PowerNet Limited	Information only map layers	MAP Electricity Lines	Not Stated	Include PowerNet's 33kV lines, and 11kv lines that are the only power supply for communities in the District Planning Maps, as shown in the Plan (pg 15 of submission) . Note that the plan maps the 33kV lines, and PowerNet are currently mapping the 10kV lines which are the only power supply for communities, which will be provided to Council once mapping is completed.	Amend the planning maps to include the Electricity Distribution Lines The identification of PowerNet's 33kV lines, and 11kv lines that are the only power supply for communities, which is required in the District Planning maps as part of the suite of changes. PowerNet seeks to protect its infrastructure from reverse sensitivity effects. The proposed mapping of the lines	Reject

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
						works in combination with the distribution line corridor provisions will assist with managing incompatible activities close to these lines, that may inhibit PowerNet's ability to provide electricity to the community.	
FS28.074	Kainga Ora			Oppose	Disallow	Consistent with the Kāinga Ora Further Submission dated 28 February 2024, Kāinga Ora does not support distribution lines being elevated to 'critical infrastructure' in the PGDP.	Accept
S101.006	Transpower New Zealand Limited	Interpretation	national grid	Support in part	Amend the definition of 'national grid' as follows. "National Grid means the network that transmits high-voltage electricity in New Zealand and that, at the commencement of these regulations, is owned, used or and operated by Transpower New Zealand Limited, including-- (a) transmission lines; and (b) electricity substations"	Transpower seeks minor amendments to the definition to: ensure that the term is capitalised consistently throughout the Proposed District Plan; delete reference to "at the commencement of these regulations" in order to better define the National Grid for the purposes of the District Plan (including for the purpose of new National Grid infrastructure)	Accept

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Submission Point	Submitter (S) / Further Submitter (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
S101.007	Transpower New Zealand Limited	Interpretation	national grid subdivision corridor	Support in part	Amend the definition of 'national grid subdivision corridor' as follows: "National Grid subdivision corridor ..."	Transpower seeks that the definition be retained, subject to minor amendments to ensure that the term 'National Grid' is capitalised consistently throughout the Proposed District Plan.	Accept
S101.008	Transpower New Zealand Limited	Interpretation	national grid yard	Support in part	Amend as follows: "National Grid yard- The area located (as illustrated below): (a) 12 metres in any direction from the outside edge of a National Grid support structure foundation; ~~(b) 12 metres from the boundary of a National Grid substation;~~ (bc) 10 metres either side of the centreline of an overhead 110kV National Grid transmission line on poles ~~(cd) 12 metres either side of the centreline of any other overhead National Grid transmission line.~~ ..."	Transpower seeks that the definition be retained, subject to minor amendments to: - ensure that the term 'National Grid' is capitalised consistently throughout the Proposed District Plan; and - correct the reference to the voltage of transmission lines on poles 110kv.	Accept in part
S128.005	Greenbriar Ltd.	Interpretation	non-renewable electricity generation	Neutral	Amendments to Energy Provisions to address the issue that the definition recognises the generation from nonrenewable energy sources, but not the source materials. This may mean that the Energy policy framework is not applicable to applications for nonrenewable	There is a potential issue created by this definition in that it recognises the generation from nonrenewable energy sources, but not the source materials. This may mean that the Energy policy framework is not applicable to applications	Reject

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Submissi on Point	Submitte r (S) / Further Submitte r (FS)	Section	Provision	Position	Summary of Decision Requested	Reasons	Officer recommendation
					energy sources, even those that are required to support the transition from nonrenewable to renewables.	for nonrenewable energy sources, even those that are required to support the transition from nonrenewable to renewables.	