

BEFORE THE MANAWATU-WANGANUI REGIONAL COUNCIL

In the matter of the Resource Management Act 1991

and

In the matter of Submissions and further submissions made by
TRUSTPOWER LIMITED to the Manawatu-
Wanganui Regional Council on the Proposed One Plan –
Infrastructure and Energy Provisions.

STATEMENT OF EVIDENCE OF ROBERT JOHN SCHOFIELD
Environmental Planner

5 August 2008

Introduction

- 1.1 My name is Robert John Schofield, and I am a Senior Principal of Boffa Miskell Limited, a national firm of consulting planners, ecologists and landscape architects. I hold the qualifications of BA (Hons) and Master of Regional and Resource Planning (Otago). I am a Member of the New Zealand Planning Institute, and a Past President (1998-2000). I have been a planning consultant based in Wellington for over 23 years, providing consultancy services for a wide range of clients around New Zealand, including local authorities, land developers, and the infrastructure and power sectors.
- 1.2 My experience includes the writing and preparation of Plan Changes for Councils and private clients, as well as work on the preparation of District and Regional Plans, including formulating provisions for infrastructure and energy development and distribution.
- 1.3 In this matter, I have been commissioned by TrustPower Limited ('TrustPower') to prepare its submissions on the Proposed One Plan and to present planning evidence on its points consistent with the purpose and principles of the Resource Management Act 1991 ('RMA' or the 'Act'). I have worked closely with both TrustPower and with other generators as part of my involvement in submissions on the Proposed One Plan.
- 1.4 In preparing my evidence, my approach was to:
- Consider the provisions of the Proposed One Plan of consequence to TrustPower, having regard to the purpose and principles of the RMA and other relevant national policies and strategies; and
 - Recommend appropriate changes that would give effect to the amendments requested by TrustPower in a way that is consistent with the RMA and my duties as an independent planning expert.
- 1.5 I have been engaged by TrustPower to provide an analysis of the Proposed One Plan in terms of the relevant statutory considerations and obligations, taking into account those issues raised by TrustPower in relation to Infrastructure and Energy. I do not intend to address many of the matters of other submitters' concerns in TrustPower's submission in detail, unless specifically relevant. Rather, the purpose of my evidence is to review the principal matters of concern to TrustPower within Chapter 3 on Infrastructure, Energy, and Waste against the purpose and principles of the RMA and good planning practice.
- 1.6 My evidence takes into account the section 42A report recommendations on the Infrastructure and Energy-related provisions of the Proposed One Plan.
- 1.7 My evidence is structured according to the following format:
- Statutory considerations, particularly the purpose and principles of the RMA.
 - An analysis of the section 42A report's recommendations into the submissions and further submissions on the Proposed One Plan as they relate to the concerns of TrustPower.

- 1.8 I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the code and am satisfied the matters I address in my evidence are within my expertise. I am not aware of any material facts that I have omitted that might alter or detract from the opinions I express in my evidence.

2 Primary Issues for TrustPower

- 2.1 As outlined in its primary submission, TrustPower generally supports the intent of the Proposed One Plan, which seeks to ensure an integrated approach to resource management in the Manawatu-Wanganui Region. In a large measure, TrustPower either supports or does not oppose the general direction and approach of the Proposed One Plan. However, the Proposed One Plan introduces a number of changes to policy that have the potential to adversely affect the ability to maintain and enhance effective and efficient renewable electricity generation within the Region.
- 2.2 For this hearing on those provisions relating to Infrastructure and Energy, TrustPower is concerned that the Proposed One Plan does not fully and satisfactorily recognise and take into account the regional and national benefits of renewable energy generation through specific objectives, policies and methods that are consistent with sections 5 and 7 of the RMA or with recent Government policy in relation to renewable energy.
- 2.3 Similar to TrustPower's primary and further submissions, I consider that the Proposed One Plan needs to provide a framework that explicitly recognises and provides for renewable energy projects consistent with New Zealand's goal to use its abundant renewable energy resources to ensure long-term sustainability and reduce the global effects of climate change. This goal is addressed through the 2004 amendments to section 7 of the RMA which were introduced to reflect Government policy about the benefits of renewable electricity generation, climate change and energy efficiency.

3 Recognising and Providing for Renewable Energy Generation

Resource Management Act Part 2 Requirements

- 3.1 The stated intent of the Proposed One Plan to provide an up-to-date statement on the significant resource management issues facing the Manawatu-Wanganui Region, with a focus on four "keystone" issues for the region.¹ While this approach provides a useful focus for the review process, it must be remembered that the regional policy statement is intended to provide an overarching strategic policy framework to ensure the integrated management of the region's natural and physical resources. In that role, it should seek to provide clear direction on all the major resource management issues facing the region: direction in terms of ensuring consistency in management among local authorities; direction for decision-makers in determining resource consents; and direction in the long term outcomes.

¹ These are: surface water degradation, increasing water demand, unsustainable hill country land use, and threatened native habitats (Section 1.3 of Proposed One Plan)

- 3.2 As RMA policy statements and plans provide one of the key mechanisms by which the Government's stated goals on climate change, renewable energy, energy efficiency and the efficient use of resources are implemented, I consider that it is important and indeed appropriate for the Proposed One Plan to recognise and provide for these matters. In general, there is little debate about the role of the Proposed One Plan in that regard.
- 3.3 While the Proposed One Plan has introduced some major policy advances, in my opinion, it does not sufficiently take into account these stated Government goals or provide for renewable energy development in a manner that recognises the regional and national benefits. It is important to recognise that renewable energy, particularly from wind, can be generated in a manner that avoids or mitigates any potential adverse environmental effects, while providing a wide range of local, regional and national benefits. Further, most large-scale renewable energy projects can provide physical infrastructure of regional significance in a manner that does not compromise the overall sustainable management of resources or other objectives and policies of the Proposed One Plan.
- 3.4 In terms of the importance of recognising and providing for renewable energy at a regional level, I would highlight that the definition of 'natural and physical resources' under the RMA includes energy. More importantly, in recognition of the growing importance of renewable energy, I note that the Act was amended in 2004 to include a definition of renewable energy as meaning "*energy produced from solar, wind, hydro, geothermal, biomass, tidal, wave and ocean current sources*". As part of the amendments to the Act in 2004, the following matters were also added to section 7 to reflect the Government's concerns about how future energy demand is to be met, and the important relationship between climate change and energy management:
- (b) The efficient use and development of natural and physical resources:*
 - (ba) the efficiency of the end use of energy:*
 - (g) Any finite characteristics of natural and physical resources:*
 - (i) the effects of climate change:*
 - (j) the benefits to be derived from the use and development of renewable energy*
- 3.5 While Chapter 3 gets into some detail on the benefits of renewable energy and infrastructure generally, I consider that it does not provide equivalent regard to these matters as to other section 7 matters, especially to clause 7(j) in relation to the benefits of using and developing renewable energy sources and clause 7(b) in relation to the efficient use and development of natural and physical resources. More specifically, while the introductory and explanatory text and the objectives of Chapter 3 seek to maintain and develop efficient, effective and sustainable infrastructure that meets the needs of the Region, in my opinion, the subsequent policies and methods (with the exception of the proposed amended Policy 3-4) do not give full effect to these objectives.
- 3.6 In recognising and providing for renewable energy and energy generation at a regional level, the Proposed One Plan should recognise that it is now an established principle that the positive effects of energy generation should not be considered as site specific, but rather in the wider national context of Part 2 of the RMA. This needs to be explicitly recognised by Chapter 3, particularly in light of the section

42A report's statement that "*the matters dealt with in Chapter 3 are not areas identified as a major focus of Horizon's resources during the life of the plan and implementing the methods would potentially draw resources away from other higher priority work*".² While I accept the need for the Regional Council to prioritise and focus its efforts, this should not negate the need for the Proposed One Plan to provide an appropriate and overarching framework for managing regionally significant infrastructure and energy in the region over the next ten years.

- 3.7 On this matter, I would draw attention to the recent confirmation by the Environment Court of the importance of electricity generation as a relevant and important matter, which I consider is an applicable statement of the significant Government policy advancements that the Act has recently introduced:

*Electricity is a vital resource for New Zealand. There can be no sustainable management of natural and physical resources without energy, of which electricity is a major component.*³

- 3.8 More specifically to renewable energy development, the ability to use land for both primary production and the production of energy has been established by the Environment Court to be an efficient use of that land resource.⁴

Other Matters

- 3.9 It is also important to affirm a couple of key points pertinent to renewable energy as should be provided for by the Proposed One Plan. Although not prepared under the RMA planning framework, a number of Government policies and strategies are considered highly relevant matters in terms of section 61(2)(a)(ii) of the Act.
- 3.10 The development of renewable energy is directly in line with Government policy, in particular New Zealand's commitment to the Kyoto Protocol, the New Zealand Energy Strategy ('NZES') and the New Zealand Energy Efficiency and Conservation Strategy ('NZECS').
- 3.11 New Zealand is a signatory to the Kyoto Protocol under which countries at different stages of development are obliged to achieve targeted reductions in greenhouse gas emissions, related to their 1990 levels. The Protocol came into force in February 2005. The New Zealand Government has a range of policies in place to assist it to achieve its obligations under the Kyoto Protocol. These include the NZES and NZECS. Consistent with the intent of section 61(2)(a)(ii) of the Act, the NZECS was prepared in accordance with the requirements of the Energy Efficiency and Conservation Act 2000. The sub-title to the current NZECS is "*action plan to maximise energy efficiency and renewable energy*".
- 3.12 The NZECS and NZES both include targets for 90% of electricity to be produced by renewable sources by 2025. The NZECS also provides that the Government intends to promote a National Policy Statement ('NPS') on renewable energy, to be finalised this year. While a draft of the Renewable Energy NPS has not yet been released, given the current government policy framework, such an NPS is likely to provide strong policy direction favouring wind energy as a technologically sound and environmentally appropriate generating method.

² Refer page 219 of the section 42A report

³ *Genesis Power Ltd v Franklin District Council* [2005] NZRMA 541 at [64].

⁴ *Meridian Energy Limited v Wellington City Council*, W031/2007 at paragraph [370].

3.13 Overall, I consider that these policy documents are a relevant reflection of public opinion that the great majority of New Zealanders wish to see energy generation provided through renewable resources and particularly wind.⁵ It is my opinion that Chapter 3 of the Proposed One Plan should therefore reflect those matters outlined above.

4 The Proposed One Plan – Infrastructure & Energy Provisions

4.1 First, I would note that if any matter raised in TrustPower’s submission is not discussed in my evidence, then it should be inferred that I agree with the relevant recommendations in the section 42A report. In particular, I support retaining all provisions of the Proposed One Plan that recognise the importance of energy generation in enabling people to provide for their wellbeing. Consistent with my earlier points, I also generally support those submissions seeking that greater regard be had in the Proposed One Plan to recognising the regional and national significance of renewable energy generation and including Issues, Objectives and Policies that give effect to renewable energy generation.

4.2 To assist the Committee, I have attached as Appendix 1 a summary table of TrustPower’s submissions and further submissions, whether the officer’s recommendation is to accept or reject these submissions, and my comments on the recommendations in respect of the provisions on Infrastructure and Energy as Appendix 1.

4.3 Before I address the more detailed recommendations in the section 42A report, I would like to highlight my general concern with Chapter 3 that the overall approach of the Chapter appears to primarily focus on managing the effects of infrastructure and energy. In my opinion, Chapter 3 does not appropriately recognise the overall purpose and principles of sustainable management as outlined in Part II of the Act, fundamentally the contribution of infrastructure and energy to the economic and social wellbeing of the Region. While I consider there are some good general points to this effect in the introductory and explanatory text, I consider that these are not sufficiently given effect to or indeed recognised by the relevant objectives, policies and methods.

4.4 I also have a general concern at the rather cursory approach to evaluating the submissions on Chapter 3 in comparison to other section 42A report evaluations to date. In particular, throughout the section 42A report, the evaluation and recommendations do not address the intent of the original submission points being considered, with a large proportion of the submissions being recommended to ‘accept in part’, but in many cases no changes have been made to the relevant provisions. In some instances, while the section 42A table states ‘accept in part’ to a number of submissions that seek the insertion of new issues in relation to energy, the final recommendations were to reject all submissions and make no changes: for example, IEW 3.

⁵ I note a recent (March 2008) survey carried out for the New Zealand Business Council for Sustainable Development showed that wind power was the most preferred of all electricity generation options, with 77% of respondents stating they believe wind is the best electricity generation source for New Zealand in the next 10 years (when more than one generation option could be selected). Seventy percent of respondents thought New Zealand was not doing enough to encourage renewable energy projects.

4.5 Although in some areas, I acknowledge that the relief sought by submitters have already been incorporated within other sections of the Proposed One Plan or through proposed changes to provisions. However, in these instances, it is by no means explicit or easy to understand what is being recommended, and it is not possible to determine the extent to which other recommended changes are deemed to have addressed ‘in part’ each submission point. These deficiencies negate the work undertaken to prepare submissions and the constructive dialogue held in pre-hearing discussions.

Recommendation IEW 1

Chapter 3 - General Overview of Chapter 3

4.6 As I have just outlined, while many submissions on the Chapter 3 were recommended to be “accepted in part” by the section 42A report, no changes to provisions were actually recommended.

4.7 TrustPower’s primary submission and further submissions in support mostly related to increasing the recognition in Chapter 3 to the use and development of renewable energy and to other Government strategies in relation to energy, climate change and security of energy supply etc.⁶ The section 42A report appears to accept in part most of the submissions on these matters (noting that the matter of renewable energy is dealt with under Recommendation IEW 12 which I will address later in my evidence.

4.8 TrustPower supported the submissions of Meridian Energy Limited (‘Meridian’) seeking recognition of the importance of security of energy supply to the sustainable management of natural and physical resources, both regionally and nationally, and the significance of the national grid in facilitating renewable energy generation from dispersed locations.⁷ Similarly, TrustPower submitted in support of Meridians’ original submission seeking that the Proposed One Plan recognises the importance of a reliable and secure energy supply system.⁸ These submissions were all rejected by the section 42A report without any substantial discussion (other than generic references to provisions that must be included in the Regional Policy Statement and Regional Strategies). I consider that the points raised by submitters are valid, are consistent with Government policy directives and, most importantly, recognise the importance of energy supply and energy-related infrastructure. Accordingly, I support their incorporation within Chapter 3.

4.9 For the reasons outlined earlier in my discussion on recognising and providing for renewable energy generation, I support the section 42A reports acceptance of the submission of Mighty River Power (supported by TrustPower) seeking the insertion of a new Issue 3-2 specifically recognising the benefits of renewable energy generation.⁹

4.10 In summary, in relation to Chapter 3 generally, TrustPower seeks:

(a) That a new Issue 3-2 be added as follows:

⁶ Refer for example submissions 359 1; supported by X 511 3; submission 363 1, supported by X 511 12 and X 511 25

⁷ Refer submission 363 5, supported by X 511 15 and X 511 16; and submission 363 6, supported by X 511 17

⁸ Refer submission 363 9, supported by X 511 20

⁹ Refer submission 359 18, supported by X 511 47

Issue 3-2: Sustainable utilisation of natural resources in the region for renewable energy production

The demand for electricity is increasing. The region contains natural resources that are able to be harnessed economically for renewable energy production. There are limited places in New Zealand where resources of such quality exist. It is essential for the social and economic well-being of the region and the nation that these resources are able to be utilised. The development of resources for renewable energy production is consistent with government policy including the New Zealand Energy Strategy, the New Zealand Energy Efficiency and Conservation Strategy and will assist in meeting New Zealand's obligations under the Kyoto Protocol.

Recommendation IEW 2

Chapter 3 - Paragraph 3.1 Scope and Background

- 4.11 Similarly to Recommendation IEW 1, I consider that the section 42A report has only cursorily evaluated a number of submissions in respect of changes sought to the Scope and Background section of Chapter 3.
- 4.12 While TrustPower's primary submission supported the retention of the Scope and Background,¹⁰ it also supported a number of submissions seeking changes to better recognise the benefits of energy generation, particularly renewable energy, and the potential resources of the Manawatu-Wanganui Region.¹¹ I note that some of these matters are addressed in Recommendation IEW 9 (Policy 3-1) and by the proposed changes to Policy 3-4 dealing with renewable energy. However, similar to Recommendation IEW 1 above, I am concerned that no changes to provisions are recommended despite the section 42A report recommendations 'accepting in part' a number of these submissions.
- 4.13 TrustPower also supported the original submission of Meridian, seeking that paragraphs be added under the title 'Renewable Energy' to recognise the Government's commitment to reduce New Zealand's green house gas emissions and to achieve increasingly sustainable energy use. Meridian's submission also sought that the Government's commitment to the use and development of renewable energy resources as an important resource management issue (as articulated by the NZEECS, the Sustainable Development Programme of Action and the NZES as discussed above) be recognised in this section.¹² Similarly to Recommendation IEW 1 above, this relief was rejected by the section 42A report without any substantive discussion or evaluation.
- 4.14 For the reasons discussed earlier in relation to the benefits of renewable energy development, I consider that the Scope and Background to Chapter 3 be amended to include more explicit discussion on renewable energy.
- 4.15 In summary, in relation to Paragraph 3.1 Scope and Background, TrustPower seeks:
- (a) That the following text be added under the title Renewable Energy:**

¹⁰ Refer submission 358 8

¹¹ Refer submissions 307 5, supported by X 511 74; 308 10, supported by X 511 51; 363 17, supported by X 511 52; 363 18, supported by X 511 53; and 363 19, supported by X 511 54

¹² Refer submission 363 19, supported by X 511 54

The Government has confirmed its commitment to reduce New Zealand’s green house gas emissions and to achieve increasingly sustainable energy use. The Government’s commitment is articulated in a policy package including the New Zealand Energy Efficiency and Conservation Strategy, the Sustainable Development Programme of Action and the New Zealand Energy Strategy. Collectively they seek to achieve economy-wide improvements in the efficiency of energy use and an increase in the supply of energy from renewable sources.

Given the national context, it is increasingly important for local government to recognise the use and development of renewable energy resources as an important resource management issue.

Recommendation IEW 3

Chapter 3 – Issue 3-1 Infrastructure and Energy

- 4.16 TrustPower originally supported a number of submissions made by Meridian seeking a wide range of amendments to Issue 3-1 to ensure that the benefits of infrastructure and energy, particularly renewable energy, were sufficiently recognised.¹³ Although the section 42A report ‘accepted in part’ most of these submissions, I note that no changes to Issue 3-1 were recommended, and that all submissions were actually rejected in Recommendation IEW 3.
- 4.17 When comparing the issues in Chapter 3 with the issues in other Chapters of the Proposed One Plan, I consider that the issues in Chapter 3 have negative connotations, relating primarily to the local adverse effects of infrastructure. Rewriting these in a more balanced approach, by better recognising the positive economic and social benefits to the Region of infrastructure and energy, would be more consistent with the overall purpose and principles of sustainable management as outlined in Part 2 of the Act, fundamentally the contribution of infrastructure and energy to the economic and social wellbeing of the Region. A revised Issue 3-1 of this nature would go a long way towards providing a more balanced description of the issues in regard to renewable energy.
- 4.18 I acknowledge that there may be potential concerns about local adverse effects prevailing over the regional and national benefits of such infrastructure, as outlined in the section 42A report. However, I do not consider that this is the most important issue and should be secondary to a statement on the more far-reaching benefits of such infrastructure as discussed above, particularly during this period of escalating energy demand, and New Zealand’s stance on climate change and renewable energy targets.
- 4.19 In my experience, most renewable energy projects undertaken in recent years have resulted in significant local, regional and national benefits while having localised effects, many of which are short-term or temporary in nature. In most situations, these temporary effects are associated with the construction period and can be avoided, remedied or mitigated by best practice in construction and environmental management. I consider this situation should be more appropriately recognised than is currently provided for in Issue 3-1.

¹³ Refer submissions 363 20 to 363 27, supported by X 511 55 to X 511 62

4.20 In summary, in relation to Issue 3-1, TrustPower seeks:

- (a) **Either delete Issue 3-1 or amend Issue 3-1 to recognise the regional and national benefits of developing infrastructure and renewable energy as follows (or to similar effect):**

The Manawatu Wanganui Region depends upon the development and efficient operation of energy generation and distribution facilities to support its economic and social well-being. Some level of adverse effects from the establishment and operation of such activities will have to be accepted as the region moves towards a more sustainable energy future, and to ensure the wellbeing of its communities and of the nation.

Recommendation IEW 6

Chapter 3 - Objective 3-1 Infrastructure and Energy

- 4.21 TrustPower's primary submission supported the retention of Objective 3-1.¹⁴ However, TrustPower subsequently submitted in support of Meridian's submission seeking that Objective 3-1 be amended to promote and enable resource use activities associated with the provision, maintenance and upgrading of infrastructure.¹⁵
- 4.22 I disagree with the section 42 report's rejection of this relief, and consider that the proposed wording suggested by Meridian is appropriate and better reflects the intent of Part 2 of the Act. Being the first objective in Chapter 3, I consider Objective 3-1 should be more proactive by recognising and promoting infrastructure and energy development, as opposed to 'recognise and enable'.
- 4.23 The purpose of the RMA under section 5 is "to promote sustainable management of natural and physical resources". It is my opinion that the generation of energy from renewable resources is consistent with the requirement of the Act to promote the sustainable management of natural and physical resources. As has been demonstrated by the development of renewable energy projects across New Zealand in recent years, such projects reduce the need to use non-renewable resources, and avoid global warming effects associated with greenhouse gas emissions. Accordingly, I consider the intent of Meridian's submission supported by TrustPower is justified and indeed appropriate.
- 4.24 TrustPower also supported the submission of Meridian to add a new objective relating to renewable energy.¹⁶ This relief was rejected by the section 42A report via a broad-brush rejection of submissions that seek greater recognition for renewable energy. I disagree with this rejection and consider the insertion of an additional Objective is appropriate, consistent with the intent of Chapter 3 and indeed consistent with section 7 of the Act, particularly subsections (ba), (i) and (j).
- 4.25 As I have outlined above, renewable energy generation has been demonstrated to represent the efficient use and development of natural and physical resources under section 7(b) of the Act through harnessing renewable resources in a manner that has minimal impacts on the underlying values.
- 4.26 In summary, in relation to Objective 3-1, TrustPower seeks:

¹⁴ Refer submission 358 9

¹⁵ Refer submission 363 28, supported by X 511 63

¹⁶ Refer submission 363 29, supported by X 511 64

- (a) **Amend Objective 3-1 as follows (or to similar effect):**

Objective 3.1: Infrastructure

To promote and enable resource use activities associated with the provision, maintenance and upgrading of infrastructure.

- (b) **And add an additional Objective 3-1 as follows:**

Objective: Renewable energy

To promote and enable the development of the Region's renewable energy resources and to encourage efficiency in energy use.

Recommendation IEW 8

Chapter 3 - Policy General

- 4.27 TrustPower supported the submission of Meridian seeking to amend Section 3.4.2 to add a new policy relating to the benefits of renewable energy.¹⁷ I support the section 42A report's recommendation to 'accept in part' this submission, and consider the intent of this submission has been achieved through the revised Policy 3-4 (discussed in more detail in relation to Recommendation IEW 12 below).

Recommendation IEW 9

Chapter 3 – Policy 3-1 Benefits of Infrastructure

- 4.28 TrustPower was one of a number of submitters who sought that Policy 3-1 be retained.¹⁸ However, TrustPower subsequently submitted in support of a number of primary submissions seeking that Policy 3-1 be amended to better take into account electricity distribution networks and that the electricity grid is redefined as per the definition from the Electricity Governance Rules 2003.^{19,20}
- 4.29 I fully support the section 42A report's recommendation to amend Policy 3-1 to take account of these submissions and consider the revised policy recognises the wide range of infrastructure in the Region as being physical resources of regional and national importance.
- 4.30 In summary, in relation to the Policy 3-1, TrustPower seeks:
- (a) **That the section 42A report's recommended revision to Policy 3-1 be accepted.**

¹⁷ Refer submission 363 34, supported by X 511 65

¹⁸ Refer submissions 358 10; 268 2, supported by X 511 66; 308 13, supported by X 511 70

¹⁹ Definition as follows: "the system of transmission lines, substations and other works, including the HVDC link used to connect grid injection points and grid exit points to convey electricity throughout the North and South Island" (as outlined in the Electricity Governance Rules 2003)

²⁰ Refer submissions 272 2, supported by X 511 67; 272 3, supported by X 511 68

Recommendation IEW 10

Chapter 3 - Policy 3-2 Adverse Effects of Other Activities on Infrastructure

- 4.31 TrustPower submitted in support of the retention of Policy 3-2, but also submitted in support of other submitters seeking modifications to Policy 3-2 to better take into account consented infrastructure or resource consent entitlements.²¹
- 4.32 The section 42A report recommended that Policy 3-2 largely be retained, with a number of specific changes relating to gas and petroleum pipelines. However, the section 42A report rejected those submissions seeking that Policy 3-2 refer explicitly to 'consented infrastructure' or 'resource consent entitlements'. While I concur with the section 42A report evaluation that this policy is largely about matters of reverse sensitivity and that it is appropriate that Policy 3-2 be applicable to all infrastructure (as not all infrastructure may require resource consents), I disagree with the rejection of this relief. Given the long timeframes between consent being granted and infrastructure being developed, particularly for larger renewable energy schemes such as wind farms or hydroelectric generation, I consider it is essential to also include reference to 'consented infrastructure' in Policy 3-2.
- 4.33 In summary, in relation to Policy 3-2, TrustPower seeks:
- (a) **That the section 42A report's recommended revision to Policy 3-2 be retained and the following added to Policy 3-2(b) (changes shown underlined):**

Ensuring that any new activity ~~ies that will adversely affect the efficiency of effectiveness of infrastructure are not located near existing infrastructure,~~ does not preclude the owners of infrastructure from fully exercising their resource consent entitlements, and that there is no change to existing or consented activities that increases their incompatibility with existing infrastructure.

Recommendation IEW 11

Chapter 3 - Policy 3-3 Adverse Effects of Infrastructure on the Environment

- 4.34 TrustPower originally submitted that Policy 3-3 be amended to refer to effects to be 'avoided, remedied or mitigated' to the same extent required of other types of activities as opposed to solely 'avoid'. In addition, TrustPower sought that Policy 3-3(b) be amended to read 'all other adverse effects of infrastructure will be managed to ensure adverse effects are minor and that they take into account'.²² TrustPower also expressed concern at the tiered approach to avoiding or managing effects implicit in Policy 3-3 and sought that this be removed.²³ TrustPower supported other similar submissions and further submission seeking that Policy 3-3 be amended or deleted.²⁴
- 4.35 This relief sought by, or supported by TrustPower was either rejected or accepted in part in the section 42A report. Regardless of the section 42A report's stated

²¹ Refer submission 358 11, supported by X 502 12 and supported in part by X 522 72, and submissions 268 3, supported by X 511 75; 307 8, supported by X 511 78; 359 24, supported by X 511 76; and 363 32, supported by X 511 77

²² Refer submissions 358 16, supported by X 521 40; and 358 17

²³ Refer submission 358 18, supported by X 521 41

²⁴ Refer submissions 268 4, supported by X 511 79; 363 33 MEL, supported by X 511 83 TPL

recommendation, I consider that the general relief requested in respect of Policy 3-3(a) has not actually been accepted ‘in part’, and the Policy remains inconsistent with other Chapters of the Proposed One Plan, a point which was accepted in the section 42A report:

... ‘the approach to managing adverse effects in this policy is inconsistent with the approach taken in other Chapters of the Proposed One Plan to manage adverse effects on the resources listed at points (i) to (v).’²⁵

- 4.36 To be consistent with the Proposed One Plan’s stated goal of ease of use and interpretation, I consider Policy 3-3 should be amended to be consistent with the Policies of other Chapters by amending Policy 3-3 to either refer to “avoid or minimise to the extent practicable any adverse effects” or “avoid as far as practicable” rather than the more restrictive term ‘avoid’ currently provided for by Policy 3-3(a).
- 4.37 Linked to my concerns above, I consider that Policy 3-3 duplicates in an inconsistent way similar policies in other Chapters of the Proposed One Plan. Such duplication of the Policies in Chapters 4, 7 and 9²⁶ runs the risk of making them redundant or inconsistent. Alternatively, if this duplication cannot be resolved, I consider that Policy 3-3 could be deleted and these activities be appropriately managed through the relevant Policies in other Chapters of the Proposed One Plan.
- 4.38 While on the point of consistency between Chapters, I note that Policy 3-3(a) refers to other general Chapters of the Proposed One Plan. I consider that this approach is inconsistent with the stated intent of various section 42A reports prepared to date, particularly the section 42A report on the Overall Plan. The section 42A report on the Overall Plan recommended changes be made throughout the Proposed One Plan to make linkages to other Chapters more clear by referencing exactly which Objectives and which Policies of the Regional Policy Statement Chapters are relevant. I note to the Committee the potential risks posed by any changes from the submissions process that could inadvertently alter the intent of Policy 3-3.
- 4.39 As a final point, TrustPower also supported the submission of Genesis Energy which sought that Lakes Otamangakau, Te Whaiiau and Moawhango be excluded from Policy 3-3 as they are artificial, and are therefore not naturally occurring habitats.²⁷ This relief was rejected by the section 42A report, relief that is inconsistent with the earlier section 42A report on indigenous biodiversity.
- 4.40 In summary, in relation to Policy 3-3(a), TrustPower seeks:
- (a) **Either that Policy 3-3(a) be worded as follows (shown underlined):**
- (a) **Effects to be avoided—The adverse effects of Avoid or minimise to the extent practicable any adverse effects of infrastructure on:**
- (i) ***waahi tapu, waahi tupuna and other sites of significance to Maori.***

²⁵ Refer page 155 of the section 42A report

²⁶ Refer for example Policy 4-2 (Waahi tapu, waahi tupuna and other sites of significance), Policy 4-3 (Protection of mauri of waterbodies), Policy 6-28 (Activities in waterbodies with a value of Natural State, Sites of Significance - Cultural, or Sites of Significance - Aquatic), Policy 7-2 (Activities in Rare and Threatened Habitats), Policy 7-3 (Activities in at-risk habitats), Policy 7-7 (Outstanding landscapes) and Policy 7-8 (Natural character)

²⁷ Refer submission 268 5, supported by 511 80

- (ii) *specified waterways valued for natural state and sites of significance (aquatic).*
- (iii) *rare and threatened habitats as identified in ~~Chapter 7~~ Schedule E.*
- (iv) *the outstanding natural features and landscapes identified in ~~Chapter 7~~ Schedule F.*
- (v) *protection zones in the coastal marine area as identified in ~~Chapter 9~~ Schedule H.*

~~*shall be managed in the same manner as other types of activities unless functional constraints require them to locate in those areas in which case adverse effects should be mitigated. Mitigation may include the use of financial contributions in accordance with the policies in Chapter 8.*~~

- (b) *Other effects - All other adverse effects of infrastructure will be managed to ensure adverse effects are minor and that they take into account:*
 - (i) *the benefits of infrastructure*, particularly the benefits of regionally or nationally important infrastructure.**
 - (ii) *the integration of the infrastructure* with land use.*
 - (iii) *the benefits to be derived from the use and development of renewable energy.*

A financial contribution may be sought in order to provide the option of offsetting or compensating for adverse effects, rather than requiring adverse effects to be avoided, remedied or mitigated, in accordance with the policies for financial contributions in Chapter 18 of this Plan.

- (b) **Or, that Policy 3-3 is deleted in its entirety.**

Recommendation IEW 12

Chapter 3 - Policy 3-4 Renewable Energy

- 4.41 TrustPower's primary submission supported the retention of Policy 3-4²⁸ as notified, but also sought changes to this policy to explicitly recognise the future use and development potential of the Region's natural resources, particularly for renewable energy generation.²⁹ TrustPower also submitted in support of a number of submissions seeking similar amendments to Policy 3-4 to better recognise the renewable energy benefits of the Region and to support and encourage renewable energy development.³⁰
- 4.42 This relief was either accepted or accepted in part by the section 42A report and, for the reasons outlined in my earlier discussion on the importance of renewable energy, I support the section 42A reports recommended changes to Policy 3-4. However, I

²⁸ Refer submission 358 12, supported by X 525 234

²⁹ Refer submission 358 20, supported by X 521 42 and X 525 236 and supported in part by X 522 82

³⁰ Refer submissions 272 8, supported by X 511 86; 307 7, supported by X 511 89; 308 16, supported by X 511 87; 363 35, supported by X 511 88

also consider that Policy 3-4 should be expanded to include reference to the following matters raised by submissions:³¹

- (a) Recognise the importance of a reliable and secure energy supply system to the sustainable management of natural and physical resources, both regionally and nationally; and
- (b) Recognise the benefits that accrue from the use and development of renewable energy resources, including reducing dependency on imported fuels and the infinite nature of renewable resources.

4.43 In my opinion, the outstanding matters above are consistent with the 2004 amendments to the Act and other relevant Government policy which recognise the multiple benefits of renewable energy generation in meeting a number of key goals, including climate change. I note that these matters were indeed recognised by the section 42A report which noted that the NZES identifies several other measures to promote renewable energy, including: “...using the RMA to provide greater leadership and guidance on consenting renewable electricity generation” and “removing barriers to distributed generation, including small-scale generation.”³²

4.44 On this matter, I note that the Environment Court recently confirmed that high quality wind resources are a finite and valuable.³³ The matter of recognising and providing for renewable energy has been discussed in some detail earlier in my evidence and I will not repeat those points again.

4.45 In summary, in relation to Policy 3-4, TrustPower seeks:

- (a) **That the section 42A report’s recommended revision to Policy 3-4 be retained to take into account the benefits of renewable energy, the Region’s potential for renewable energy development and the need for renewable energy to be located where the resource is located; and**
- (b) **That Policy 3-4 also is amended to include the following additional clauses:**
 - i. Recognise the importance of a reliable and secure energy supply system to the sustainable management of natural and physical resources both regionally and nationally; and*
 - ii. Recognise the benefits that accrue from the use and development of renewable energy resources, including reducing dependency on imported fuels and the infinite nature of renewable resources.*

Recommendation IEW 13

Chapter 3 - Policy 3-5 Energy Efficiency

4.46 TrustPower’s further submission supported the primary submission of Genesis seeking that Policy 3-5 be amended to clarify that part (a) does not apply to the generation and transmission of electricity.³⁴ TrustPower also supported the primary submission of Meridian seeking that Policy 3-5 be amended through the addition of a

³¹ Refer submissions 359 1, supported by X 511 3; 359 3, supported by X 511 5; 363 1 to 363 9; supported by X 511 12 to 20; 268 52, supported by X 511 46

³² Refer page 166 of the section 42A report

³³ *Meridian Energy Limited v Wellington City Council*, W031/2007 at paragraph [370].

³⁴ Refer submission 268 7, supported by X 511 91

clause (d) to encourage energy efficiency through conservation and efficient energy use.³⁵ However, I am satisfied at the rejection of this relief by the section 42A report and consider that the current policy meets the requirements of the Act.

4.47 In summary, in relation to Policy 3-5, TrustPower seeks:

(a) That the section 42A report's recommendation regarding Policy 3-5 accepted.

Recommendation IEW 22

Chapter 3 - Methods General

4.48 TrustPower's primary submission sought the insertion of an additional method relating to the use of rivers/lakes for renewable energy generation.³⁶ TrustPower also supported a number of submissions seeking that methods of implementation are added regarding infrastructure to provide more continuity to related methods and policies later in the plan.³⁷ These submissions were all rejected by the section 42A report.

4.49 Without getting into the specific detail sought by each of these submissions, I consider that a Chapter on Infrastructure and Energy should include at least one method that either recognises the benefits of renewable energy generation or alternatively ensures that Council works proactively with renewable energy providers to improve consent processes.

4.50 I note that the section 42A report evaluation stated that "*the lack of non-regulatory methods for infrastructure and energy is therefore essential*" and that "*it is intended that many of the policies in Chapter 3 will be implemented during Horizons resource consent processes and the normal territorial authority district planning and resource consent processes*".³⁸ Although I consider these valid points, the approach taken by Chapter 3 is certainly not consistent with the methods in other chapters of the Proposed One Plan which are intended to implement the objectives and policies of each chapter.

4.51 I disagree with the section 42A report's statement that "*the matters dealt with in Chapter 3 are not areas identified as a major focus of Horizon's resources during the life of the plan and implementing the methods would potentially draw resources away from other higher priority work*".³⁹ For the reasons discussed earlier in relation to the benefits of renewable energy development, I consider that infrastructure is a key contributor to the social and economic wellbeing of the Region, and the nation as a whole, and has been recognised as such in Part 2 of the Act. While it is appropriate for the Regional Council to prioritise its resource allocation and programmes, making better provision for renewable energy in the Region in the Proposed One Plan should not require large resources from the Council over the next decade.

³⁵ Refer submission 363 36, supported by X 511 92

³⁶ Refer submission 358 48, supported by X 522 168 and X 525 251

³⁷ Refer submissions 268 8, supported by X 511 93; 272 12, supported by X 511 94; 363 37 to 363 40, supported by X 511 95 to X 511 98; 363 99, supported by X 511 309

³⁸ Refer page 219 of the section 42A report

³⁹ Refer page 219 of the section 42A report

4.52 Accordingly, I concur with the submissions of TrustPower and others that it is appropriate and indeed consistent with the Act to include methods that recognise the benefits of renewable energy generation or ensure that Council works proactively with renewable energy providers to improve consent processes.

4.53 In summary, in relation to the Methods generally, TrustPower seeks:

- (a) **That a new method be included to recognise and provide for the benefits of renewable energy generation (or to similar effect); or**
- (b) **That a new method be included that requires Council to work proactively with renewable energy providers to improve consent processes (or to similar effect).**

Recommendation IEW 26 and IEW 28

Chapter 3 - Anticipated Environmental Result Table General and Anticipated Environmental Result Table Row 1

4.54 TrustPower supported the submissions of Mighty River Power and Meridian seeking that the anticipated environmental results in Chapter 3 be amended to refer to the efficient use and development of the Manawatu-Wanganui Region's renewable energy resources contributing towards an increased proportion of New Zealand's energy consumption being derived from renewable sources.⁴⁰ I support the rejection of this relief by the section 42A report, and consider that the relief sought, and supported by, TrustPower is already included by the recommended changes to Policy 3-4 in relation to renewable energy (subject to additional changes sought as discussed earlier in my evidence).

4.55 In summary, in relation to the Anticipated Environmental Result Table, TrustPower seeks:

- (a) **That the section 42A report's recommendations be accepted.**

Recommendation IEW 31

Chapter 3 - Explanation and Principal Reasons 3.7.1 Infrastructure and Energy

4.56 TrustPower supported the submission of Meridian seeking increased recognition be given to the importance of renewable energy generation throughout the Explanation and Principal Reasons.⁴¹ This relief was accepted in the section 42A report table, but was actually rejected in the recommendation part of the section 42A report. I note that the section 42A report's decision on TrustPower's further submission in support was also inconsistent with the original Meridian submission.

4.57 For the reasons outlined by Meridian's original submission and earlier in my evidence in relation to providing for renewable energy in the Region, I disagree with the section 42A report's rejection of these submissions, and consider that amending Chapter 3 through the addition of the following text would be consistent with the Act.

⁴⁰ Refer submissions 359 27, supported by X 511 99; and 363 41, supported by X 511 100

⁴¹ Refer submission 363 48; supported by X 511 107

4.58 In summary, in relation to the Explanation and Principal Reasons, 3.7.1 Infrastructure and Energy, TrustPower seeks:

- (a) **That Section 3.7.1 is amended to include the relief outlined in the primary submission of Meridian in relation to the importance of renewable energy generation to the Region (or text to similar effect).**

5 Conclusion

- 5.1 In conclusion, I support the overall intent and approach of the Proposed One Plan to provide a strong framework for promoting the integrated management of the Region's natural and physical resources, focusing on key regional assets and issues. In particular, the recognition of the region's significant infrastructural and energy generation assets and resources within the Plan are supported.
- 5.2 However, given the national and regional benefits provided by infrastructure and energy and the Government's stated commitment to providing for renewable energy generation consistent with its climate change goals and other related policies, I consider that the One Plan should contain a more appropriate level of recognition of, and provision for, renewable energy generation. It is vital that those provisions of the One Plan as they relate to Infrastructure and Energy need to recognise the regional and national significance of this resource use, and the Region's contribution to their national benefits, consistent with purpose and principles of the RMA.
- 5.3 Accordingly, I would recommend that the relief sought by TrustPower be accepted, according to the manner outlined in my evidence.



Robert Schofield
Senior Principal, Boffa Miskell Limited | Environmental Planner
5 August 2008

APPENDIX 1: Summary of primary and further submissions of TrustPower Limited on the Horizons Proposed One Plan

INFRASTRUCTURE & ENERGY PROVISIONS

Submitter Submitter	number / Relief Sought	Officer's recommendation	Comments on Officer's recommendation
Recommendation IEW 1 - General Overview of Chapter 3			
359 1 Mighty River Power (MRP) X 511 3 (Support)	The incorporation of relevant themes contained within national energy policy directions into the Regional Policy Statement and the Regional Plan namely: <ul style="list-style-type: none"> - Recognition of the importance of security of energy supply as a pivotal component to the sustainable management of natural and physical resources - Recognition of the benefits that accrue from the use and development of renewable energy resources including reducing dependency on imported fuels and the infinite nature of renewable resources - Recognition that renewable energy must be harnessed where the resource is and provide for the use of those resources - Recognise the priority to be given to renewable energy through resource allocation decisions - The contribution that renewable energy projects make towards meeting New Zealand's energy targets and international obligations such as the Kyoto Protocol; - The significance of the national grid in facilitating renewable generation from dispersed locations - Consideration of any updated policy at the date that decisions are made on submissions. 	359 1 Accept in part X 511 3 Accept in part	Support in part, however consider that the relief sought has not been accepted in part, and have been rejected
359 3 MRP X 511 5 (Support)	Mighty River Power seeks the following decision from the regional council: The incorporation of polices into the Plan that: <ul style="list-style-type: none"> - Provide recognition of the importance of security of energy supply as a pivotal component to the sustainable management of natural and physical resources - Recognise the nationally significant energy resource base of the region, including its wind and hydro resources. - Incorporation of policy directions within the Plan which recognise that in some instances that the use and development of renewable resources will take precedence over other values; 	359 3 Accept in part X 511 5 Accept in part	Support in part, however consider that the relief sought has not been accepted in part, and have been rejected

359 8 MRP X 511 9 (Support)	Clarify throughout the plan that where ever the term essential infrastructure is used that it is inclusive all the facilities identified within the definition of infrastructure excluding irrigation.	359 8 Reject X 511 9 Reject	Support
359 90 MRP X 511 10 (Support)	Amend all sections of the plan so that any resource consent required for any renewable energy activity is no more restrictive than a discretionary activity.	359 90 Reject X 511 10 Reject	Support in part, subject to relief sought in Policy 3-4
363 1 Meridian Energy Limited (MEL) X 511 12 (Support) X 511 25 (Support)	Meridian requests the One Plan better addresses and incorporates the relevant themes contained within New Zealand's statutory and policy directives including: The contribution that renewable energy can make towards meeting New Zealand's Kyoto Protocol commitments in terms of reducing climate change emissions Any consequential amendments necessary to give effect to this submission	363 1 Accept in part X 511 12 Accept in part X 511 25 Accept in part	Support in part, subject to relief sought in Policy 3-4
363 10 MEL X 511 21 (Support)	Meridian requests the One Plan is amended to: Incorporate policy directions which recognise that in some instances, the benefits to be derived from the development of renewable energy generation facilities will outweigh the adverse effects that might arise. Any consequential amendments necessary to give effect to this submission	363 10 Accept X 511 21 Accept	Support in part, subject to relief sought in Policy 3-4
363 2 MEL X 511 13 (Support)	Meridian requests the One Plan better addresses and incorporates the relevant themes contained within New Zealand's statutory and policy directives including: Recognition of the benefits that accrue from the use and development of renewable energy resources including reducing dependency on imported fuels and the infinite nature of renewable resources Any consequential amendments necessary to give effect to this submission	363 2 Accept in part X 511 13 Accept in part	Support in part, subject to relief sought in Policy 3-4
363 3 MEL X 511 14 (Support)	Meridian requests the One Plan better addresses and incorporates the relevant themes contained within New Zealand's statutory and policy directives including: Recognition that renewable energy must be harnessed where the resource is and provide for the use of those resources; Any consequential amendments necessary to give effect to this submission	363 3 Accept in part X 511 14 Accept in part	Support in part, subject to relief sought in Policy 3-4
363 5 MEL X 511 15 (Support) X 511 16 (Support)	Meridian requests the One Plan better addresses and incorporates the relevant themes contained within New Zealand's statutory and policy directives including: Recognition of the importance of security of energy supply to the sustainable management of natural and physical resources both regionally and nationally; and Any consequential amendments necessary to give effect to this submission	363 5 Reject X 511 15 Reject X 511 16 Reject	Oppose, refer to relief sought in Policy 3-4
363 6 MEL X 511 17 (Support)	Meridian requests the One Plan better addresses and incorporates the relevant themes contained within New Zealand's statutory and policy directives including:	363 6 Reject X 511 17 Reject	Support in part, refer to relief sought in Policy 3-4

	The significance of the national grid in facilitating renewable energy generation from dispersed locations. Any consequential amendments necessary to give effect to this submission		
363 7 MEL X 511 18 (Support)	Meridian requests the One Plan is amended to: Expressly recognise the benefits that people and communities, and future generations, obtain from the use and development of renewable energy resources; Any consequential amendments necessary to give effect to this submission	363 7 Accept in part X 511 18 Accept in part	Support, recognised in the changes to policy 3-4
363 8 MEL X 511 19 (Support)	Meridian requests the One Plan is amended to: Recognise that the Region is well placed and critically important for development of renewable energy resources; Any consequential amendments necessary to give effect to this submission	363 8 Accept in part X 511 19 Accept in part	Support, recognised in the changes to policy 3-4
363 9 MEL X 511 20 (Support)	Meridian requests the One Plan is amended to: Recognise the importance of a reliable and secure energy supply system; Any consequential amendments necessary to give effect to this submission	363 9 Reject X 511 20 Reject	Oppose, refer to relief sought in Policy 3-4
268 52 Genesis Power Limited (Genesis) X 511 46 (Support)	Genesis Energy requests the inclusion of any consequential changes required to the objectives, policies and rules to give effect to the matters requested below: - Recognition of the importance of a reliable and secure energy supply system as a pivotal component to the sustainable management of natural and physical resources within the Plan. - Incorporation of policy directions within the Plan which recognise that in some instances that the use and development of renewable resources will take precedence over other values. - Recognition of the renewable energy resource base of the region.	268 52 Accept in part X 511 46 Accept in part	Support in part, refer to relief sought in Policy 3-4
358 13 Trust Power (TPL) X 522 28 MEL (Support in Part)	Amend Section 3 to include specific reference to the benefits of using natural resources for energy generation; or insert a new issue as follows: "Issue 3-2: Sustainable utilisation of natural resources in the region for energy production" Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this submission.	358 13 Accept in part X 522 28 Accept in part	Support
358 14 TPL	Amend Section 3 to recognise the regional and national significance of the Region's energy development potential. Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this submission.	358 14 Accept	Support

<p>359 18 MRP X 511 47 (Support)</p>	<p>The addition of a new issue as follows (or words to similar effect):</p> <ul style="list-style-type: none"> - Issue 3-2: Sustainable utilisation of natural resources in the region for renewable energy production <p>The demand for electricity is increasing. The region contains natural resources that are able to be harnessed economically for renewable energy production. There are limited places in New Zealand where resources of such quality exist. It is essential for the social and economic well-being of the region and the nation that these resources are able to be utilised. The development of resources for renewable energy production is consistent with government policy including the New Zealand Energy Strategy, the National Energy Efficiency and Conservation Strategy and will assist in meeting New Zealand's obligations under the Kyoto Protocol.</p>	<p>359 18 Accept X 511 47 Accept</p>	<p>Support in part, refer to relief sought in Recommendation IEW 1 and Policy 3-4</p>
<p>359 19 MRP X 511 48 (Support)</p>	<p>The inclusion of a new objective as follows (or words to similar effect):</p> <ul style="list-style-type: none"> - Objective 3-3 <p>To promote the utilisation of the region's renewable energy resources</p>	<p>359 19 Accept X 511 48 Accept</p>	<p>Support in part, refer to relief sought in Policy 3-4</p>
<p>359 20 MRP X 511 49 (Support)</p>	<p>The inclusion of new policies to 3.4 as follows (or words to similar effect):</p> <ul style="list-style-type: none"> - The region contains nationally significant renewable energy resources. The utilisation of these resources for energy generation will promote the social and economic well-being of the region and the nation and is consistent with the government's energy policy. - The benefits to be derived from the use and development of the renewable resources will be given particular regard in policy development and consent decision-making. These benefits include the use of resources that have an infinite supply and the ability to offset greenhouse gas emissions. - There are a number of factors that constrain the ability for sites to be utilised for renewable energy developments. These factors include wind speed, access to transmission, site availability, and proximity of population. For these reasons it is important that available sites are efficiently used and developed. 	<p>359 20 Accept in part X 511 49 Accept in part</p>	<p>Support in part, refer to relief sought in Policy 3-4</p>
<p>363 16 MEL X 511 50 (Support)</p>	<p>Meridian requests the following changes:</p> <p>Amend Chapter 3 to provide a separate suite of objectives and policies in relation to renewable energy (as separate from infrastructure and non renewable energy facilities), as per the general submission above [363/1 through to 363/6], and changes as requested below to the issues, objectives and policies.</p> <p>Any consequential amendments necessary to give effect to this submission</p>	<p>363 16 Accept in part X 511 50 Accept in part</p>	<p>Support</p>
<p>Recommendation IEW 2 - Paragraph 3.1 Scope and Background</p>			
<p>307 5 The Energy Efficiency & Conservation Authority</p>	<p>The Energy Efficiency & Conservation Authority seeks the following amendments to the 4th paragraph under</p>	<p>307 5 Accept in part X 511 74 Accept in part</p>	<p>Oppose, although these were accepted in part, there are no changes</p>

<p>(EECA) X 511 74 (Support)</p>	<p>Section 3.1 - scope and background</p> <p>Energy is essential to the way we live our lives. Energy enables people to provide for their well-being, health and safety, and is a key factor in the regional and national economy.</p> <p>Horizons recognises it has a requirement to provide for the development and use of renewable energy resources. Regional councils have an important leadership and integration role within the region in supporting, planning for, and management of sustainable energy development as well as providing appropriate guidance to district councils. Government has developed energy strategies and made changes to the RMA to encourage energy efficiency and greater uptake of renewable energy over use of non-renewable resources. The New Zealand Energy Strategy calls for all new generation to be renewable except to the extent necessary for security of supply. It sets out a vision of a sustainable, low emissions energy future for New Zealand. Energy demand is growing and the composition of New Zealand's energy supply is changing with the decline of the Maui gas field. These factors coupled with the need to reduce greenhouse gas emissions mean that it is imperative that renewable forms of electricity generation are developed. The Manawatu- Wanganui Region has the potential for the development of renewable energy facilities. This potential has been identified in the Renewable Energy Assessment for the Manawatu- Wanganui Region completed by the Energy Efficiency and Conservation Authority. The region has some of the best wind resources in New Zealand. The map attached as schedule X shows the general areas that have potential for wind farms. The southern part of the North Island is the windiest area in New Zealand. The Tararua ranges, the northern part of the west coast hills, the east coast hills and coastline, and central plateau around Waiouru all have high wind speeds.</p> <p>There is also potential to develop hydro electricity resources, both large, small and mini hydro. The map attached as schedule XX shows locations of identified hydro electricity development potential. There is some potential for wave energy along the coastline. This potential is both regionally and nationally significant and will be recognised and provided for.</p> <p>One of the barriers facing development of renewable energy includes the difficulty in securing access to natural resources.</p>		<p>proposed to this section of the One Plan.</p> <p>My view therefore is that the relief sought has not been accepted in part, but has been rejected.</p>
<p>308 10 NZ Windfarms Limited X 511 51 (Support)</p>	<p>Submitter supports Scope and Background: Renewable energy paragraph, pg no 3-1</p>	<p>308 10 Accept X 511 51 Accept</p>	<p>Support</p>
<p>363 17 MEL X 511 52 (Support)</p>	<p>Meridian opposes Section 3.1 in part and requests the following amendments or similar: Under the title "Infrastructure" amend paragraph 2 as follows: Infrastructure includes road and rail networks, energy networks for electricity, oil and gas, facilities for energy generation (excluding renewable energy generation facilities), water supply, etc. Any consequential amendments necessary to give effect to this submission.</p>	<p>363 17 Accept in part X 511 52 Accept in part</p>	<p>Support,</p>
<p>363 18 MEL</p>	<p>Meridian opposes Section 3.1 in part and requests the following amendments or similar:</p>	<p>363 18 Accept</p>	<p>Support in part, subject to Policy 3-4</p>

X 511 53 (Support)	Under the title "Renewable energy", amend the last sentence of paragraph 1 as follows: One of the barriers facing development of renewable energy includes the difficulty in securing access to natural resources and uncertainty posed by planning frameworks that do not adequately provide for the assessment and considerations of all relevant issues. Any consequential amendments necessary to give effect to this submission	X 511 53 Accept	
363 19 MEL X 511 54 (Support)	Meridian opposes Section 3.1 in part and requests the following amendments or similar: Under the title "Renewable energy", add the following new paragraphs: The Government has confirmed its commitment to reduce New Zealand's green house gas emissions and to achieve increasingly sustainable energy use. The Government's commitment is articulated in a policy package including the National Energy Efficiency and Conservation Strategy, the Sustainable Development Programme of Action and the New Zealand Energy Strategy. Collectively they seek to achieve economy-wide improvements in the efficiency of energy use and an increase in the supply of energy from renewable sources. Given the national context, it is increasingly important for local government to recognise the use and development of renewable energy resources as an important resource management issue. Any consequential amendments necessary to give effect to this submission	363 19 Reject X 511 54 Reject	Oppose – seek this matter be specifically spelt out in Proposed One Plan
358 8 TPL	Retain Issue 3-1: Infrastructure and energy as read; Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this submission	358 8 Accept	Support
Recommendation IEW 3 – Issue 3-1 Infrastructure and Energy			
363 20 MEL X 511 55 (Support)	Meridian opposes Issue 3-1 and requests the following amendments or similar: Change title to: Infrastructure, Renewable Energy and Waste Any consequential amendments necessary to give effect to this submission	363 20 Reject X 511 55 Reject	Support
363 21 MEL X 511 56 (Support)	Meridian opposes Issue 3-1 and requests the following amendments or similar: Amend current Issue 3.1 as follows: "The Manawatu Wanganui Region depends upon the development and efficient operation of energy generation and distribution facilities to support its economic and social well-being. Some level of adverse effects from the establishment and operation of such activities will have to be accepted as the region moves towards a more sustainable energy future, and to ensure the wellbeing of its communities and the nation." Any consequential amendments necessary to give effect to this submission	363 21 Reject X 511 56 Reject	Oppose, this Issue is negative and should be re-written to be more positive (as the first issue in the Chapter).
363 22 MEL	Meridian opposes Issue 3-1 and requests the following amendments or similar:	363 22 Accept in part	Oppose, the relief sought

X 511 57 (Support)	<p>And add new issues to Section 3.1 as follows: 1. New Zealand's economy is expected to continue to grow and this growth can only be supported by continued growth in the supply of energy. Any consequential amendments necessary to give effect to this submission</p>	X 511 57 Accept in part	has not been accepted in part, and have been rejected.
363 23 MEL X 511 58 (Support)	<p>Meridian opposes Issue 3-1 and requests the following amendments or similar: And add new issues to Section 3.1 as follows: Energy conservation and efficiency measures alone will not be sufficient to meet all future energy demands and additional energy generation is expected to be needed. Any consequential amendments necessary to give effect to this submission</p>	363 23 Accept in part X 511 58 Accept in part	Oppose, as above
363 24 MEL X 511 59 (Support)	<p>Meridian opposes Issue 3-1 and requests the following amendments or similar: And add new issues to Section 3.1 as follows: The development of infrastructure and renewable energy generation facilities can create adverse effects on the environment. In particular the scale and utilitarian nature of many facilities may cause adverse landscape and visual effects. Any consequential amendments necessary to give effect to this submission</p>	363 24 Accept in part X 511 59 Accept in part	Oppose, as above
363 25 MEL X 511 60 (Support)	<p>Meridian opposes Issue 3-1 and requests the following amendments or similar: And add new issues to Section 3.1 as follows: The development of infrastructure and renewable energy generation facilities are essential to the economic, cultural and social wellbeing of the people and communities of New Zealand. Any consequential amendments necessary to give effect to this submission</p>	363 25 Accept in part X 511 60 Accept in part	Oppose, as above
363 26 MEL X 511 61	<p>Meridian opposes Issue 3-1 and requests the following amendments or similar: And add new issues to Section 3.1 as follows: Renewable energy resources can have environmental benefits compared to generation from non renewable energy resources, including the threat posed by climate change and the use of indigenous fuels. Any consequential amendments necessary to give effect to this submission</p>	363 26 Accept in part X 511 61 Accept in part	Oppose, as above
363 27 MEL X 511 62 (Support)	<p>Meridian opposes Issue 3-1 and requests the following amendments or similar: And add new issues to Section 3.1 as follows: The Region's wind energy resource has significant potential for energy generation. New renewable energy generation facilities will have particular locational constraints. For example wind generation facilities often need to be located on hilltops and ridgelines or in coastal environments - with unavoidable visual changes. Any consequential amendments necessary to give effect to this submission</p>	363 27 Accept in part X 511 62 Accept in part	Oppose, as above

Recommendation IEW 6 - Objective 3-1 Infrastructure and Energy			
358 9 TPL X 522 55 MEL (Oppose)	Retain Objective 3-1: Infrastructure and energy as read. Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this submission	358 9 Accept X 522 55 Accept	Support
363 28 MEL X 511 63 (Support)	Meridian opposes in part Objective 3-1 and seeks it is amended as follows or similar: Objective 3.1: Infrastructure To promote and enable resource use activities associated with the provision, maintenance and upgrading of infrastructure. Any consequential amendments necessary to give effect to this	363 28 Reject X 511 63 Reject	Support, as above
363 29 MEL X 511 64 (Support)	Meridian opposes in part Objective 3-1 and seeks it is amended as follows or similar: Add new objective: Objective: Renewable energy To promote and enable the development of the regions renewable energy resources and to encourage efficiency in energy use. Any consequential amendments necessary to give effect to this submission	363 29 Reject X 511 64 Reject	Oppose, inclusion of such an objective would be consistent with policy 3-4 and renewable energy.
Recommendation IEW 8 - Policy General			
363 34 MEL X 511 65 (Support)	Meridian seeks Section 3.4.2 is amended to add a new policy as follows or similar: Policy: Benefits of renewable energy (a) All persons exercising functions and powers under the RMA shall: Recognise the benefits to be derived from renewable energy generation facilities at a local, regional and national level; Recognise and enable appropriate development of the Manawatu Wanganui Regions significant renewable energy resources; Recognise the threat of climate change and the contribution renewable energy can make to achieving New Zealand's climate change objectives; Provide for renewable energy generation facilities, while as far as practicable avoiding, remedying or mitigating adverse effects on the environment, particularly of large scale or prominent facilities; Encourage energy efficiency through conservation and efficient energy use. Any consequential amendments necessary to give effect to this submission	363 34 Accept in part X 511 65 Accept in part	Support in part, the amendments to Policy 3-4 that have regard to these points.
Recommendation IEW 9 – Policy 3-1 Benefits of Infrastructure			

268 2 Genesis X 511 66 (Support)	Retain Policy 3-1.	268 2 Accept X 511 66 Accept	Support
272 2 Powerco Limited (Powerco) X 511 67 (Support)	Policy 3-1(a) to include two additional items to read: 4. - Electricity distribution networks defined as the system of subtransmission and 11/33kV distribution feeders and substations 5. - Gas distribution networks defined to include all mains pipe and gate stations together with associated valves and fittings The description of infrastructure of regional and national importance in effect creates a definition. Consideration should be given to moving this section to the glossary. See also Submission P.	272 2 Accept in part X 511 67 Accept in part	Support revised definition in Policy 3-1 and deletion of definition of infrastructure.
272 25 Powerco X 511 69 (Oppose)	The definition of "infrastructure of regional and national importance" as defined in Policy 3-1, Benefits of Infrastructure, p3-3 be amended as per Powerco s Submission B and the definition be moved to the Glossary.	272 25 Reject X 511 69 Accept	Support, as above
272 3 Powerco X 511 68 (Support)	Policy 3-1: (a) (ii) be amended as follows: The electricity grid is redefined as "the system of transmission lines, substations and other works, including the HVDC link used to connect grid injection points and grid exit points to convey electricity throughout the North and South Island". (This is the definition from the Electricity Governance Rules 2003.)	272 3 Accept X 511 68 Accept	Support, as above
308 13 NZ Windfarms Limited X 511 70 (Support)	Submitter supports Policy 3-1 Benefits of infrastructure, pg no 3-3	308 13 Accept X 511 70 Accept	Support, as above
358 10 TPL	Retain Policy 3-1: Benefits of Infrastructure as read. Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this submission	358 10 Accept	Support, subject to changes above
359 23 MRP X 511 71 (Support)	The amendment of Policy 3-1 (b) so that it reads as follows: (b) In making decisions about the establishment, maintenance, alteration, upgrading, and expansion of infrastructure within the Region, including the infrastructure of regional and national importance listed in subsection (a), the benefits derived from the infrastructure shall be taken into account; and Any consequential changes required to the objectives, policies and rules to give effect to the matters requested in this submission	359 23 Reject X 511 71 Reject	Support, subject to changes above.
363 30 MEL X 511 72 (Oppose)	Meridian opposes in part Policy 3-1 and seeks the following amendments or similar: Policy 3-1: Benefits of Infrastructure Add clause:	363 30 Reject X 511 72 Accept	Support

	(a)(viii) community irrigation schemes. Any consequential amendments necessary to give effect to this submission		
363 31 MEL X 511 73 (Support)	Meridian opposes in part Policy 3-1 and seeks the following amendments or similar: Meridian seeks that the benefits of renewable energy generation facilities are separated out into new policies under Section 3.4.2 Energy. Any consequential amendments necessary to give effect to this submission	363 31 Reject X 511 73 Reject	Support in part, subject to recommended changes to Policy 3-4
Recommendation IEW 10 – Policy 3-2 Adverse Effects of Other Activities on Infrastructure			
268 3 Genesis X 511 75 (Support)	Amend Policy 3-2 as follows: Adverse effects from other activities on infrastructure shall be avoided, remedied or mitigated by using appropriate mechanisms, for example: (a) ensuring that current infrastructure corridors are taken into account in all resource management decision-making, and any development that will adversely affect the efficiency or effectiveness of infrastructure within these corridors is avoided (b) ensuring that any new activities that will adversely affect the efficiency or effectiveness of infrastructure are not located near existing infrastructure, and that there is no change to existing activities that increases their incompatibility with existing infrastructure (c) notifying the owners or managers of infrastructure of consent applications that may adversely affect the infrastructure that they own or manage (d) giving effect to the New Zealand Code of Practice for Electrical Safe Distances (NZECP 34:2001), prepared under the Electricity Act 1992, when establishing rules and considering applications for buildings, structures, and other activities near overhead electric lines and conductors (e) ensuring that any planting does not interfere with existing infrastructure, including giving effect to the Electricity (Hazards from Trees) Regulations 2003 promulgated under the Electricity Act 1992 Infrastructure, Energy, and Waste 3-4 Proposed One Plan growth areas of the Region, including protecting the function of the strategic road and rail network. Alternatively, add wording which excludes the application of this policy to new electricity generation.	268 3 Reject X 511 75 Reject	Support rejection, as these matters already well addressed in existing Policy 3-2, and referring to consented (not existing) infrastructure not needed.
307 8 EECA X 511 78 (Support)	ECCA seeks the following amendment to policy 3-2(b) (b) ensuring that any new activities that will adversely affect the efficiency or effectiveness of infrastructure* are not located near existing or consented infrastructure*, and that there is no change to existing activities that increases their incompatibility with existing infrastructure	307 8 Reject X 511 78 Reject	Oppose, seek inclusion of consented infrastructure or words to like effect
358 11 TPL X 502 12 New Zealand Defence Force (Support)	Retain Policy 3-2: Adverse effects of other activities on infrastructure as read. Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this	358 11 Reject X 502 12 Reject X 522 72 Accept in part	Support, subject to inclusion of consented infrastructure.

X 522 72 MEL (Support in part)	submission		
359 24 MRP X 511 76 (Support)	- Retain Policy 3-2. - Amend Policy 3-2 (a) by deleting the words 'corridors' from the policy.	359 24 Accept in part X 511 76 Accept in part	Support
363 32 MEL X 511 77 (Support)	Meridian requests Policy 3-2, clause (b) is amended as follows or similar: Policy 3-2 Adverse effects of other activities on infrastructure (b) ensuring that any new activity does not preclude the owners of infrastructure from fully exercising their resource consent entitlements, and that there is no change to existing activities that increases their incompatibility with existing infrastructure. Any consequential amendments necessary to give effect to this submission	363 32 Reject X 511 77 Reject	Oppose, seek inclusion of consented infrastructure or words to like effect
Recommendation IEW 11 – Policy 3-3 Adverse Effects of Infrastructure on the Environment			
268 4 Genesis X 511 79 (Support)	Amend Policy 3-3 as follows: (a) Effects to be avoided, remedied or mitigated The following adverse effects of infrastructure shall be avoided, remedied or mitigated to the same extent required of other types of activities: (i) effects on waahi tapu, waahi tupuna and other sites of significance to Maori (ii) effects on specified waterways valued for natural state and sites of significance (aquatic) (iii) effects on rare and threatened habitats as defined in Chapter 7 (iv) effects on the outstanding natural features and landscapes identified in Chapter 7 (v) effects on protection zones in the coastal marine area as identified in Chapter 9 unless functional constraints make this impossible, in which case adverse effects should be mitigated. Mitigation may include the use of financial contributions in accordance with the policies in Chapter 18. Note: This was an error in my document, not in the proposed plan. (b) Other effects. All other adverse effects of infrastructure will be managed in a manner that tolerates minor adverse local effects and takes into account: (i) the benefits of infrastructure, particularly the benefits of regionally or nationally important infrastructure (ii) the integration of the infrastructure with land use (iii) the benefits to be derived from the use and development of renewable energy. A financial contribution may be sought in order to provide the option of offsetting or compensating for adverse effects, rather than requiring adverse effects to be avoided, remedied or mitigated, in accordance with the policies for financial contributions in Chapter 18 of this Plan.	268 4 Accept in part X 511 79 Accept in part	Support in part, but seek this chapter is made consistent with other chapters of the One Plan.
268 5 Genesis X 511 80 (Support)	In addition Genesis Energy requests that Lakes Otamangakau, Te Whaiiau and Moawhango are excluded from Policy 3-3 as they are man made and are therefore not naturally occurring	268 5 Reject X 511 80 Reject	Oppose, seek that man-made lakes are excluded from Policy 3-3. Note that

	habitats.		the section 42A report recommended the removal of Lakes Otamangakau, Te Whaiu and Moawhango from Objective 7-1 as per the submission of Genesis Energy because they are artificial and are therefore not naturally-occurring habitats.
272 6 Powerco X 511 81 (Oppose)	The removal of the ability to seek financial contributions from infrastructure providers.	272 6 Reject X 511 81 (Accept)	Support
272 7 Powerco X 511 82 (Oppose)	If financial contributions are to be introduced Powerco asks that they be used sparingly and with great care.	272 7 Accept in part X 511 82 Accept in part	Support
358 16 TPL X 521 40 Allco Wind Energy N Z Limited (Support) X 522 510 MEL (Oppose)	Amend Policy 3-3 provision (a) to read: "(a) Effects to be avoided, remedied or mitigated the following adverse effects of infrastructure shall be avoided, remedied or mitigated to the same extent required of other types of activities." Any similar amendment with like effect. Any consequential amendments that stem from the amendment of policy 3.3 as proposed in this submission.	358 16 Accept in part X 521 40 Accept in part X 522 510 Accept in part	Oppose, seek additional amendments to Policy 3-3.
358 17 TPL X 522 511 MEL (Oppose)	Amend Policy 3-3 provision (b) to read: "(b) All other adverse effects of infrastructure will be managed to ensure adverse effects are minor and that they take into account:" Any similar amendment with like effect. Any consequential amendments that stem from the amendment of policy 3.3 as proposed in this submission.	358 17 Reject X 522 511 Accept	Oppose, as above
358 18 TPL X 492 59 Minister of Conservation (Oppose) X 521 41 Allco Wind Energy NZ Limited (Support) X 522 512 MEL (Oppose)	Delete the tiered approach to avoiding or managing effects implicit in Policy 3-3. Any similar amendment with like effect. Any consequential amendments that stem from the amendment of policy 3.3 as proposed in this submission.	358 18 Reject X 492 59 Accept X 521 41 Reject X 522 512 Accept	Oppose, as above
358 19 TPL X 522 513 MEL (Oppose)	Delete the part of Policy 3-3 that refers to mitigation and financial contributions. Any similar amendment with like effect. Any consequential amendments that stem from the amendment of policy 3.3 as proposed in	358 19 Reject X 522 513 Accept	Support, as discussed in more detail in the evidence on the Biodiversity Chapter

	this submission.		(re mitigation and offsets.
363 33 MEL X 492 61 Minister of Conservation (Oppose) X 511 83 TPL (Oppose)	Meridian requests that Policy 3.3 is deleted in its entirety. Any consequential amendments necessary to give effect to this submission	363 33 X 492 61 Accept X 511 83 Accept	Support in part, subject to alternative relief as outlined above.
372 13 Minister of Conservation X 511 84 (Oppose)	Delete the words from 'unless' to 'mitigated' and amend first part of paragraph (a) to read 'Effects to be avoided, remedied or mitigated - The following adverse effects of infrastructure shall be avoided, remedied or mitigated to the same extent required of other types of activities:'	372 13 Reject X 511 84 Accept	Support
Recommendation IEW 12 - Policy 3-4 Renewable Energy			
272 8 Powerco X 511 86 (Support)	Policy 3-4, Renewable Energy to remain unchanged.	272 8 Accept X 511 86 Accept	Support
307 7 EECA X 511 89 (Support)	Policy 3-4 should be amended as follows: Policy 3-4: Renewable energy (a) The region's potential for the development of renewable energy development is recognised, and the development of renewable energy resources will be promoted. (i) In particular the areas marked on the attached map XX are recognised as those areas which have potential for wind farms. (ii) The areas marked on the attached map XX have potential for hydro electricity development (b) District and regional plans shall include objectives, policies and rules that: recognise and provide for the development, operation, maintenance and upgrade of renewable energy facilities; and recognise the social, economic and environmental benefits of the production and transmission of renewable energy, including national and regional benefits; and recognise the functional need for renewable energy facilities to locate where the renewable energy resource is. This includes the rural and coastal environment, or coastal marine area (for wave energy); and Manage activities that adversely affect renewable energy infrastructure, including reverse sensitivity. (c) The development of renewable energy generation and use of renewable energy resources shall be preferred to the development and use of non renewable energy resources in policy development and resource consent decision-making. (d) Local authority decisions and controls on land use should generally not restrict the use of small domestic-scale renewable energy production for individual domestic use. (e) District Councils shall consider Identifying areas of significant value for renewable energy; identifying areas where small scale (under 10 Megawatts) renewable energy facilities would	307 7 Accept in part X 511 89 Reject	Support

	be appropriate; and providing objectives, policies and rules which facilitate small scale renewable energy generation.		
308 16 NZ Windfarms Limited X 511 87 (Support)	Submitter supports Policy 3-4 Renewable energy, pg no 3-4	308 16 Accept X 511 87 Accept	Support
358 12 TPL X 525 234 Genesis (Support)	Retain Policy 3-4: Renewable energy as read. Any similar amendment with like effect. Any consequential amendments that stem from the amendments as proposed in this submission	358 12 Accept X 525 234 Accept	Support
358 20 TPL X 521 42 Allco Wind Energy N Z Ltd (Support) X 522 82 MEL (Support in part) X 525 236 Genesis (Support)	(i) Amend Policy 3-4 to explicitly recognise the future use and development potential of the Region's natural resources, particularly for renewable energy generation. (ii) Any similar amendment with like effect. (iii) Any consequential amendments that stem from the amendment of Policy 3-4 as proposed in this submission.	358 20 Accept in part X 521 42 Accept in part X 522 82 Accept in part X 525 236 Accept in part	Support
363 35 MEL X 511 88 (Support)	Meridian supports in part Policy 3-4 and seeks clause (a) is amended as follows: (a) The development of renewable energy generation facilities and use of renewable energy resources shall be supported and encouraged to the development and use of non renewable resources in policy development and resource consent decision-making. Any consequential amendments necessary to give effect to this submission	363 35 Accept in part X 511 88 Accept in part	Support
372 14 Minister of Conservation X 511 90 (Oppose)	Retain existing wording.	372 14 Accept X 511 90 Reject	Support
Recommendation IEW 13 - Policy 3-5 Energy Efficiency			
268 7 Genesis X 511 91 (Support)	Genesis requests that the policy be amended to clarify that part (a) does not apply to the generation and transmission of electricity.	268 7 Reject X 511 91 Reject	Support
363 36 MEL X 511 92 (Support)	Meridian requests Policy 3-5 is amended as follows or similar: Add an additional clause (d) as follows: (d) Encourage energy efficiency through conservation and efficient energy use Any consequential amendments necessary to give effect to this submission	363 36 Reject X 511 92 Reject	Support
Recommendation IEW 22 - Methods General			
268 8 Genesis X 511 93 (Support)	Genesis Energy requests that methods of implementation are added regarding infrastructure to provide more continuity to related methods and policies later in the plan.	268 8 Reject X 511 93 Accept in part	Oppose, to be consistent with the other chapters, seek a method in relation to infrastructure, preferably

			renewable energy.
272 12 Powerco X 511 94 (Support)	The inclusion of an additional project: Project Name - Possible RMA mechanisms for enabling a sustainable low emissions energy system Project Description - Investigating the opportunities available to the Regional Council and Territorial Authorities to support the delivery of a sustainable low emissions energy system. Who - Regional Council, Territorial Authorities and energy sector participants Links to Policy - The project links to Policies 3-3, 3-4 and 3-5 Targets - Report back to parent agencies and any affected parties from the Region by the end of 2008.	272 12 Reject X 511 94 Reject	Oppose, as above
363 37 MEL X 511 95 (Support)	Meridian requests the following methods or similar are included in Section 3.5 Local authorities District plans and Resource Consents Horizons Council will work with local authorities to ensure due regard is given to the policies contained in Chapter 3, Infrastructure, Renewable Energy and Waste, when considering changes to district plans and assessing resource consents. Any consequential amendments necessary to give effect to this submission	363 37 Reject X 511 95 Reject	Oppose, as above
363 38 MEL X 511 96 (Support)	Meridian requests the following methods or similar are included in Section 3.5 Public Information Energy Efficiency Horizons Council will work with local authorities to increase the public awareness of climate change by preparing and disseminating information on how to increase energy efficiency within both existing buildings and when designing new buildings. Advocate and encourage the use of energy efficient design for buildings and subdivision. Any consequential amendments necessary to give effect to this submission	363 38 Reject X 511 96 Reject	Support
363 39 MEL X 511 97 (Support)	Meridian requests the following methods or similar are included in Section 3.5 Public Information Regional Energy Use and Development Prepare and disseminate information on regional energy use, renewable energy development and greenhouse gas emissions. Any consequential amendments necessary to give effect to this submission	363 39 Reject X 511 97 Reject	Support
363 40 MEL X 511 98 (Support)	Meridian requests the following methods or similar are included in Section 3.5 Codes of Practice Promote the use of relevant codes of practice Any consequential amendments necessary to give effect to this submission	363 40 Reject X 511 98 Reject	Oppose, consider this should be spelt out explicitly in this Chapter (similar to other chapters that refer to such codes).
358 48 TPL X 487 115 Fonterra Cooperative Group Limited (Oppose) X 522 168 MEL (Support)	Insert an additional method that addresses the use of rivers/lakes for renewable energy generation. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of the Methods as proposed	358 48 Reject X 487 115 Accept X 522 168 Reject	Oppose, consider that such a method be included to recognise the benefits of renewable energy

X 525 251 Genesis (Support)	in this submission.	X 525 251 Reject	generation
363 99 MEL X 511 309 (Support)	Meridian opposes in part Section 6.5 and requests the following amendment or similar: New methods are included to address the use of rivers and lakes for hydro electricity generation. Any consequential amendments necessary to give effect to this submission	363 99 Reject X 511 309 Reject	Oppose, as above.
Recommendation IEW 26 - Anticipated Environmental Result Table General			
359 27 MRP X 511 99 (Support)	The replacement of the existing anticipated environmental result with two new anticipated environmental results as follows: - The processing of applications for infrastructure and renewable energy developments within the statutory timeframes. - The contribution that the region makes to the renewable energy target; and - Make specific reference to flood management infrastructure in the second Anticipated Environmental Result to which it relates. - Any consequential changes required to the objectives, policies and rules to give effect to the matters requested in this submission	359 27 Reject No section 42A report relief	Support in part, subject to changes to Policy 3-4
363 41 MEL X 511 100 (Support)	Meridian requests the following amendments or similar to Section 3-6: Add the following AERs (a) Efficient use and development of the Manawatu- Wanganui Regions renewable energy resources contributing towards an increased proportion of New Zealand's energy consumption being derived from renewable sources. Any consequential amendments necessary to give effect to this submission	363 41 Reject No section 42A report relief	Support in part, subject to changes to Policy 3-4.
Recommendation IEW 28 - Anticipated Environmental Result Table Row 1			
363 42 MEL X 511 101 (Support)	Meridian requests the following amendments or similar to Section 3-6: Add the following AER's Establishment of renewable energy generation facilities in appropriate locations and ensuring their on-going efficient operation in a manner that avoids or mitigates adverse effects. Any consequential amendments necessary to give effect to this submission	363 42 Reject X 511 101 Reject	Support
363 43 MEL X 511 102 (Support)	Meridian requests the following amendments or similar to Section 3-6: Add the following AER's The processing of applications for infrastructure and renewable energy developments within the statutory timeframes. Any consequential amendments necessary to give effect to this submission	363 43 Reject X 511 102 Reject	Support
363 44 MEL	Meridian requests the following amendments or similar to Section 3-6:	363 44 Reject	Support

X 511 103 (Support)	Add the following AER's Increased efficiency of energy use within the Region. Any consequential amendments necessary to give effect to this submission	X 511 103 Reject	
311 8 Water and Environmental Care Assn Inc X 511 104 (Oppose)	2017 is too far out for coastal wind erosion reduction. Shift that date back to 2012	311 8 Reject No section 42A report relief	Support
363 45 MEL X 511 105 (Support)	Meridian requests the following amendments or similar to Section 3-6: Amend indicator column to include: Increased capacity of installed renewable energy generation throughout the Region; Any consequential amendments necessary to give effect to this submission	363 45 Reject X 511 105 Reject	Support
363 46 MEL X 511 106 (Support)	Meridian requests the following amendments or similar to Section 3-6: Amend indicator column to include: Reduction in energy use within the Region; and Any consequential amendments necessary to give effect to this submission	363 46 Reject X 511 106 Reject	Support
Recommendation IEW 31 - Explanation and Principal Reasons 3.7.1 Infrastructure and Energy			
363 48 MEL X 511 107 (Support)	Meridian requests Section 3.7.1 is amended to refer to renewable energy separately from infrastructure, and that text is included to discuss the new objectives and policies sought by this submission as follows or similar. Explanations and Principal Reasons -Renewable Energy Renewable energy generation facilities provide essential community services, and their ongoing maintenance and operation is vital to efficient functioning and wellbeing of the Manawatu Wanganui Region. Encouraging energy generation from renewable sources is necessary to achieve longterm reductions in local and national dependence on non-renewable resources. The positive benefits derived from renewable energy generation should be recognised when considering standards that may affect their establishment, operation and resource consent applications. It is recognised that these facilities can have significant effects on the environment. The objectives, policies and methods are intended to ensure a comprehensive assessment of the positive and adverse effects of these facilities. This will facilitate the establishment of renewable energy generation facilities in appropriate locations and enable their efficient operation while avoiding, remedying or mitigating their adverse effects as appropriate. The operational and locational requirements of renewable energy generation and distribution facilities should be taken into account when development and performance standards are established and when considering applications for consent, to recognise that the usual thresholds may not be appropriate for such facilities. Renewable energy generation and distribution facilities are important assets and it is appropriate to ensure that new activities nearby do not adversely affect their efficient operation.	363 48 Accept X 511 107 Reject (note should be Accept)	Support in part, but note that this relief should be 'accept in part' as not all Meridian's relief has been accepted.

	<p>Provision for domestic self-sufficiency in renewable energy generation and other services should be made. At the least, the development standards should not limit opportunities where such facilities have no more than minor adverse effects.</p> <p>In terms of renewable energy generation, wind and hydro are the most likely forms to be produced in the Manawatu Wanganui Region, as already demonstrated by the existing wind farms and dams present. There is an excellent wind resource in the Region, as well as land capacity to cater for future wind energy facilities. Encouraging energy generation from renewable sources is necessary to achieve long-term reductions in local and national dependence on non-renewable resources. The use of solar water heating and solar panels on dwellings can also greatly contribute towards increasing the use of renewable energy. again, these renewable energy initiatives would work best through advocacy and encouragement, rather than regulation under the RMA. Advocacy is the main method of implementing sustainable energy policies because it educates and empowers individuals and businesses to implement the initiatives themselves, to fit their circumstances. There are various codes of practice and good environmental management techniques that will be promoted in the design, location and operation of renewable energy generation and distribution systems, as well as in energy use, such as the energy efficiency through good building design, using inbuilt passive heating and cooling systems.</p> <p>Any consequential amendments necessary to give effect to this submission</p>		
358 140 TPL	<p>Retain the definition of 'Infrastructure' as read. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of this definition as proposed in this submission.</p>	358 140 Accept	Support, the proposed changes to this term and its deletion from the glossary.