

Inquiry on the Natural and Built Environments Bill

New Zealand Wind Energy Association Submission

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Committee Secretariat
Environment Committee
Parliament Buildings
Wellington

By email: en@parliament.govt.nz

Introduction

1. The New Zealand Wind Energy Association (NZWEA) welcomes the reform of the resource management system and appreciates the opportunity to make a submission on the exposure draft of the Natural and Built Environments Bill (the NBA) and the accompanying parliamentary paper.
2. The Association would like to present to the Environment Select Committee in support of its submission.
3. As an introductory comment, the Association acknowledges the importance of resource management system reform and the complexity of ensuring policy and target alignment across the energy, environmental, and climate change domains if New Zealand is to achieve social, economic and environmental wellbeing whilst also being a responsible global citizen.
4. In particular, the Association recognises that climate change is a critical issue for the resource management system reform to address, being at the intersection of preventing environmental degradation resulting from inappropriate infrastructure development while enabling responsible development to mitigate the environmental impacts of climate change.
5. The Association has therefore submitted on most recent consultations relating to these domains, including the Productivity Commission's Low-emissions Inquiry¹, the Electricity Price Review², MBIE's Accelerated Renewable Energy and Energy Efficiency Discussion Document³, the Zero Carbon Bill⁴, and ETS Reform⁵, and has engaged with the Interim Climate Change Committee and responded to the Climate Change Commission's draft advice⁶.
6. In recognition of the importance of the resource management system reform, the country's principal electricity generators⁷ and NZWEA (collectively referred to as the

¹ Productivity Commission, Low-emissions Economy Report, August 2018.

² Electricity Price Review Options Paper, February 2018 and First Report, August 2018.

³ MBIE Accelerating renewable energy discussion document, December 2019.

⁴ Climate Change Response (Zero Carbon) Amendment Bill, May 2019.

⁵ MfE Consultation – Reforming the NZ Emissions trading Scheme: Proposed Settings, December 2019.

⁶ Climate Change Commission 2021 Draft Advice for Consultation, January 2021.

⁷ Meridian Energy, Mercury NZ, Contact Energy, Trustpower and Genesis Energy.

Electricity Sector Environment Group (ESEG)) has prepared a joint submission which is attached.

7. The joint submission notes support for the reform objectives and a number of key aspects of the Bill. The joint submission also recommends amendments relating to the built environment and critical infrastructure focused on renewable electricity generation (REG).
8. In addition to the joint ESEG submission, there are a number of aspects of the Bill that the Association wishes to comment on to provide context with a specific focus on wind energy and the forecast need to significantly build new generation.
9. **While acknowledging and appreciating the early consultation the Association considers that there is a real risk if environmental limits are inappropriately set and absolute in their application, to the extent that they prevent the development of renewable electricity generation.** Renewable generation is a cornerstone of decarbonising the economy to meet New Zealand’s international climate change commitments and mitigate climate change impacts.

Executive Summary

10. The NZWEA has two priority areas that its work programme is focused on and which have influenced its responses to the Exposure Draft. These are:
 - Resource management system reform and ensuring the RMA’s replacement better enables the wind industry to consent new renewable electricity generation to support achievement of the 2050 net zero carbon emissions target.
 - Sustaining the energy trilemma⁸ in the transition of the sector to a higher level of renewable electricity generation particularly in a dry year situation when combined with a projected significant growth in demand.
11. In supporting the joint ESEG submission, the Association makes the following key points:

<p>Recognition of, and addressing, Resource Management Act (RMA) issues as the basis for reform</p>	<ul style="list-style-type: none"> ▪ The Association does not consider that the issues with the current resource management system have been fully addressed in the draft Bill. ▪ It is acknowledged significant aspects of the reform have yet to be developed: however, in this submission, the Association details its and ESEG’s concerns with the draft Bill.
<p>Ensuring a strategic focus</p>	<ul style="list-style-type: none"> ▪ The Resource Management Review Panel has highlighted the importance of a long term and integrated strategic approach and clear national direction. ▪ The Association notes that key strategic aspects of the reform such as the national planning framework (NPF) and Strategic Planning Act (SPA) are yet to be developed. These will be essential to the effective transformation of the resource management system.

⁸ The ‘energy trilemma’ refers to a country’s ability to provide a secure supply of energy, that is affordable and environmentally sustainable.

	<ul style="list-style-type: none"> ▪ However, as noted in the ESEG submission, key links to the broader strategic goals and purpose of the reform in the NBA are limited at this stage, with limits set to protect ecological integrity and human health rather than achieving the broader purpose of the reforms.
<p>Ensuring climate change, electricity and environmental sector targets are aligned</p>	<ul style="list-style-type: none"> ▪ The Government has clear targets for climate change, growth of the electricity sector and, once the NPF is fully developed, for environmental targets. ▪ The resource management system is key enabler of all three sectors and, as highlighted in the ESEG submission, unless there is clear policy direction in the NBA's purpose and reference in environmental limits to climate targets, there will be a lack of alignment.
<p>Ensuring environmental limits do not have unintended consequences</p>	<ul style="list-style-type: none"> ▪ Recent consultations including the draft National Policy Statement for Indigenous Biodiversity (NPS-IB) have highlighted the risks of broadly defined absolute environmental limits. ▪ Wind energy, given resources are location specific, invariably has an environmental impact which has historically been addressed with recourse to mitigation, compensation or offsetting. ▪ As future projects are expected to come into conflict with environmental limits of the kind now proposed to be mandated, it would be critical for renewable energy projects to be able to achieve environmental outcomes on a net basis, assessed taking into account any environmental offsetting and/or compensation proposed.
<p>Ensuring environmental outcomes are balanced</p>	<ul style="list-style-type: none"> ▪ The language used for the outcomes in the Bill is variable and there is a need to ensure climate change, decarbonisation and renewable energy outcomes are placed at least on equal footing with other environmental drivers. ▪ NZWEA considers that the outcomes related to renewable energy and climate change (objectives "(o)" and "(p)") should be refocussed so that renewable generation is not simply an 'infrastructure' matter. Instead, there should be clear recognition of the role of renewable energy in achieving climate change outcomes. ▪ For those reasons, the Association supports the ESEG submission's proposal (part 19) to strengthen and use more directive language in support of climate change mitigation and the importance of increasing renewable electricity generation.

An effective conflict resolution mechanism is key to meeting reform objectives	<ul style="list-style-type: none"> ▪ The Association references the ESEG submission’s comments (para 20) that further attention should be given to ensuring needed infrastructure services, particularly highly locational constrained infrastructure such as renewable electricity generation, can be provided.
Ensuring regional spatial planning is an enabler	<ul style="list-style-type: none"> ▪ The potential for regional spatial strategies (RSS) to be an enabler of development is recognised, particularly if the consenting pathway is simplified for infrastructure development within identified areas. ▪ However, given the complexity of renewables development and ever-changing technology, an overreliance on RSS to provide for renewable electricity generation would create a significant risk, particularly if areas are narrowly defined and generation development outside of identified areas was limited.
Flexibility to adapt is paramount	<ul style="list-style-type: none"> ▪ The Association supports the proposed approach of having the NPF as secondary legislation. ▪ New technologies will continue to be deployed such as offshore wind energy and the resource management system must have the flexibility to be able to adapt to both infrastructure and environmental developments.

12. Without more information on the form or process for developing the NPF, the nature and extent of environmental limits or the impact of the SPA and RSSs, it is not possible for the Association to form a view as to extent to which the reform objectives, including the provision of infrastructure services, will be enabled by the reform. The ESEG submission does, however, based on available information, identify where risks and issues are apparent that will materially restrict the ability to develop new renewable electricity generation in support of climate change targets and recommends a number of amendments to the exposure draft.
13. What is paramount, given the importance of achieving climate change targets, is that the environmental statutory framework acknowledges the decarbonisation imperative. There is a recognised need to accelerate renewable electricity generation, and wind energy in particular, and a key measure of the reforms success is whether responsible development is enabled.
14. To achieve this, competing national policy directions – decarbonisation to address the environmental impacts of climate change and biophysical limits to address environmental degradation, must be balanced.

Recognition of Resource Management Act issues as the basis for reform

15. Issues with the RMA have been well documented. In relation to the energy sector, a 2016 Ministry for the Environment Report on the effectiveness of the National Policy Statement

for renewable Electricity Generation (NPS-REG) ⁹ concluded *‘the NPS-REG does not appear to have resulted in noticeably more certainty for resource consent applicants for REG projects’* and *‘the NPS-REG has not resulted in nationally consistent approaches to the drafting of regional and district plans’*.

16. Key challenges noted included *‘a lack of detailed direction and guidance’* and *‘the complexities in balancing and resolving interactions between the NPS-REG and other national policy statements and other competing RMA part 2 matters at a local level’*.
17. A number of influential reports on the electricity sector ¹⁰ and on addressing the impacts of climate change ¹¹ have similarly highlighted the importance of resource management reform if the potential of renewable electricity generation to contribute to the decarbonisation of the energy sector and the 2050 net zero emissions target is to be achieved.
18. In response, the Government has, in addition to the wider review of the resource management system, in parallel commenced a review of national direction on renewable electricity.
19. The national direction project has reviewed existing RMA provisions relating to renewable electricity, national direction instruments and case law, and has identified a number of challenges in the current resource management system to achieving New Zealand’s climate change and renewable electricity targets. The key issues which have been identified include:
 - Existing national direction on renewable electricity generation provides limited direction and weak policy wording. As such it has generally been ineffective.
 - There are gaps in the application of the National Policy Statement for Electricity Transmission and National Environmental Standard on Electricity Transmission Activities which mean that certain transmission and distribution are not as effectively enabled.
 - There is a lack of clear national direction on resolving key tensions between competing national and local interests and environmental/biophysical limits (e.g. extent of natural wetlands, significant natural areas high natural character, and outstanding natural landscapes and features).
 - There are uncertainties relating to the consenting pathways for renewable electricity projects which trigger ‘avoid policies’, regardless of whether the project can demonstrate net environmental and economic benefits.
 - Acceptance of offsetting and compensation approaches, to avoid significant adverse effects, is limited.
 - **The time, complexity and cost of consenting renewable projects under the current system is acting as a barrier to some renewable electricity projects and will not provide for the pace of development required to meet New Zealand’s renewable electricity generation targets.**

⁹ Ministry for the Environment, Report on the Outcome Evaluation of the National Policy Statement for Renewable Electricity generation, December 2016 Electricity Authority, Transmission Pricing Review, July 2019.

¹⁰ Electricity Price Review Final Report October 2019 and MBIE Accelerating Renewable Energy discussion document, December 2019.

¹¹ Productivity Commission, Low-emissions Economy Report, August 2018. Interim Climate Change Committee Accelerated Electrification April 2019, He Pou a Rangi Climate Change Commission, 2021 Draft Advice for Consultation January 2021

- The re-consenting process is overly complex, inconsistent and creates significant uncertainty and costs.
 - Catch-all discretionary/non-complying activity rules do not reflect the variability of environmental effects for different types and scales of generation.
20. The Association also maintains that the current RMA consenting process is a major barrier to the development of community and other distributed renewable generation projects as it does not differentiate on the scale and complexity of projects.
 21. Studies undertaken by the Parliamentary Commissioner for the Environment¹² confirm that large scale wind farms can only ever occupy a limited portion of a country's wind locations. Other locations with microclimates that have funnelling or hilltop attributes are very favourable for community wind projects.
 22. Internationally, small-scale community-owned wind farms are a growing sector to utilise available wind resource and increase local energy independence while reducing carbon emissions. Denmark, Germany, Austria and the Netherlands have high levels of community ownership which have played a major role in the development of wind energy.
 23. The current consenting process favours large-scale developments where the high cost of consenting has a relatively lower overall impact on commercial viability and generally is in the range of between \$25k and \$50k per MW. For small developments consenting costs can be significantly higher. As an example, it has been estimated the consenting cost of wind turbines on Stewart Island would be in the order of \$0.5m to \$1.0m per MW¹³.
 24. The Association considers smaller scale wind projects a key opportunity to support regional growth and improve energy resilience. Resource management reform to simplify and reduce the cost and uncertainty of obtaining a consent is a necessary prerequisite to enabling such developments.
 25. As detailed in the following sections the Association does not consider that the issues and risks with the current resource management system have been fully addressed in the draft NBA.

Ensuring a strategic focus

26. The Resource Management Review Panel highlighted the importance a long term and integrated strategic approach and clear national direction as a recommendation and essential if the known failings of the RMA are to be avoided.
27. While it is challenging to provide a comprehensive submission given the Bill is a partially completed draft, with key strategic aspects of the reform such as the form of the NPF not yet complete, and the SPA not yet available, the decision for early consultation is welcome.
28. As an exposure draft, a key consideration is whether the Bill achieves the balance between improving environmental outcomes and better enabling urban and other development.
29. In the Association's view there are risks that the necessary balance will not be achieved. The risk is that the infrastructure required to reduce emissions and address the impacts of

¹² PCE Report Wind Power, People and Place (2006b) Parliamentary Commissioner for the Environment, PCE Report (2006a) Get smart, think small. Wellington Parliamentary Commissioner for the Environment.

¹³ Roaring40s Wind Power presentation to the 2021 Wind energy Conference – Wind Development Potential including Small Scale opportunities May 2021.

climate change will not be able to proceed due to the definition of environmental outcomes and environmental limits that set bottom lines which will inevitably conflict with renewables development opportunities and / or insufficient national direction.

30. The risks may be addressed as further development of the resource management system occurs. In particular, the nature and form of the NPF and details of the SPA and RSSs may better enable essential infrastructure services to be developed.
31. However, as noted in the ESEG submission (para 19), key links to the broader government strategic goals relating to addressing the impacts of climate change and developing renewable electricity generation are absent. In particular, the Association considers that an inflexible focus on protecting ecological integrity and human health risks unintended consequences.
32. While not a focus of this submission, the Association wishes to note the third piece of legislation, the Managed Retreat and Climate Change Adaptation Act, will require significant investment in infrastructure and will therefore have a dependency on getting an appropriate and enabling balance in the NBA and SPA.

Aligning Climate Change, Electricity Sector and Environmental Targets

33. Climate change is undoubtedly the environmental issue of our time, with global warming expected to have a material negative impact even if global emission reduction targets are achieved.
34. The Government, in passing the Climate Change Response Act, has supported global ambition by setting a target of achieving a net zero emissions of greenhouse gases other than biogenic methane by January 2050. The recent Climate Change Commission (CCC) Final Advice has recommended targets for the first 3 budget periods as a pathway to achieving the net zero target.
35. The Commission recommends a 63% reduction in long lived gases by 2035 with key transition strategies including accelerating the uptake of electric and other zero emissions cars, buses and trucks and vehicles, phasing out fossil base-load generation and replacing coal (and eventually gas) with biomass and electricity in industrial heat processes.
36. Electrification of the energy sector with renewables is therefore a key plank of the CCC's recommendations.
37. From a 2020 baseline, the CCC has wind generation increasing by 7.6 TWh (308%) by 2035 under their demonstration pathway. Should Tiwai stay, wind generation would need to increase by 10.9 TWh (479%). Wind generation is forecast to increase from 5% of total generation to 18% (demonstration pathway) or 26% if Tiwai stays by 2035.
38. Transpower is forecasting a wind capacity of 6,500 MW and generation of 19.6 TWh by 2050 to comprise 28% of total generation¹⁴. The Waipipi Wind Farm, commissioned in 2021, and Turitea and Harapaki Wind Farms which are under construction, will see wind capacity double to 1,200 MW. An additional 5,300 MW of wind will be required to meet Transpower's forecast, this is an increase of over 430% and represents an additional 53 wind farms at 100MW each that will need to be consented and built.
39. The Government has set a target of 100% renewable electricity generation by 2030. Renewable generation averaged 81% in 2020 and whether 100% (or near that value) can

¹⁴ Transpower Whakamania i Te Mauri Hiko, Empowering our Energy Future, March 2020.

be achieved in the timeframe will depend on sustaining existing capacity and enabling new build activity.

40. Under the Bill, environmental limits will be prescribed in the NPF or plans, with the intention that the limits are absolute bottom lines in their application.
41. Given the resource management system will determine whether and where infrastructure can be built, for renewable electricity generation, which has a dependency on the availability of natural resources, the definition of environmental limits will be key.
42. NZWEA considers there is a high likelihood of wind energy coming into conflict with biophysical limits and, if limits are to be enforced without recourse to mitigation including compensation or offsetting, it will be essential to test whether proposed environmental limits prevent the achievement of the Government's climate change and electricity targets.
43. Without ensuring alignment and having a supportive resource management system there is a material risk that the significant renewable electricity generation build required to enable decarbonisation of the energy sector will not be possible.
44. In addition, enabling the consenting of current renewable generation, and hydro generation in particular, will be essential to sustaining capacity and being available to support the short-term variability of wind and solar generation.
45. Part 2 of the NBA therefore needs to provide clear policy direction that enables responsible new and existing renewable electricity generation assisted also by direction that ensures climate change targets and specific environmental limits are balanced.

Environmental limits – the risk of unintended consequences

46. While acknowledging environmental limits are yet to be set, the Association considers there is a risk that they may be developed in such a way as to prevent the full electrification of our society.
47. This is so for all renewable generation and wind energy in particular as the resource is 'where it is', usually affecting the natural environment, and therefore there is an inherently higher risk of conflicting with environmental limits.
48. Recent consultations have highlighted the risk of broadly defined absolute environmental limits. While recognising the imperative to improve indigenous biodiversity when responding to the 2019 consultation on indigenous biodiversity¹⁵, in NZWEA's view, the draft National Policy Statement on Indigenous Biodiversity demonstrated this risk when it proposed to set a very low bar on triggering the 'significance' test. The Association accepts that meeting an environmental objective while also enabling infrastructure development, and specifically responsible renewable electricity development, will be challenging. However, it does not consider that making environmental limits immutable is the solution, particularly if such thresholds are to be qualitatively defined, and therefore subject to interpretation.
49. NZWEA submitted that the draft National Policy Statement – Indigenous Biodiversity (NPS-IB) represents a significant risk to new renewable electricity generation development and its enabling transmission infrastructure, particularly given the very broad and inclusive environmental limits and criteria contained in the draft:

¹⁵ He Kura Kōiora i hōkia Discussion document on a proposed National policy Statement for Indigenous Biodiversity November 2019.

- Section 3.8 of the NPS and criteria in appendix 1 will result in most if not all indigenous features being recognised as “significant”. In addition, the list of effects of activities which must be avoided in a Significant Natural Area (SNA) will mean most if not all new wind farm design will need to avoid all indigenous features with no effects mitigation or offset potential.
 - While there is a carve out for nationally significant infrastructure under 3.9(2)(d), which includes grid connected renewable electricity generation, the nature of the attributes and the guidance for interpretation, listed in appendix 2, is likely to result in most SNAs being considered “high” and therefore the “must avoid” requirement will prevail without the ability to consider the mitigation/offset hierarchy.
 - Renewable electricity development can only occur where there are natural resources that make development commercially viable. It is noted that in wind farm and other renewable consents, offsetting has been used to manage effects which cannot be avoided.
 - Section 3.9aiii, and the requirement to avoid any fragmentation or loss of buffering, also creates challenges for wind farm consents whereas this has previously been able to be addressed through offsetting.
50. The Association sought changes to balance interests such as better defining high ranking / conditions and enabling ecological mitigation / offsets and mechanisms that are financially responsible that cause management, enrichment, spatial enlargement and physical protection of IB in exchange for effects to medium and low ranking IB, but also perhaps other types of effect too. This would be an important ability for the new legislation to enable.
 51. To illustrate difficulties that environmental limits could create, the Association references the new National Environmental Standard (NES) for Freshwater (NES-F)¹⁶ and, in particular, section 53 Prohibited Activities which defines any earthworks or taking, use, damming, diversion or discharge of water within a natural wetland as a prohibited activity.
 52. While problematic for the wind industry, particularly as definition of a wetland is likely to be interpreted extremely broadly (which recent experience indicates it has), the Association understands the NES-F already had a significant impact on aggregate extraction and that options are being considered to address the restriction.
 53. The draft NPS-IB and NES-F are examples where if environmental limits are broadly defined and absolute, they can create an impassable barrier in planning and consenting (including re-consenting) of existing and new renewable generation projects.
 54. Wind energy consents invariably have an environmental impact which has historically been addressed with recourse to mitigation, compensation or offsetting. It is highly likely that future projects will come into conflict with environmental limits of the kind now being mandated under clause 7 of the Bill.
 55. NZWEA considers that the NBA can provide a better balance to navigate between absolute limits for the majority of projects, if it enables a more nuanced approach to the way in which limits are set. This would include enabling limits to be set on a locationally-specific basis and/or for different limits to apply to different activities. For example, it would be useful for an environmental limit to be set for all activities but with a recognition that renewable energy projects were entitled to achieve the limit on a net basis assessed

¹⁶ Resource Management (National Environmental Standards for Freshwater) August 2020.

when considering any environmental offsetting and/or compensation proposed. That result would ensure that the environmental limit was effective, while not precluding activities that were in keeping with that limit.

56. Inserting a climate specific environmental target in clause 7 would assist achieving balance and ensure the overall intent and outcomes of the NBA are achieved.

Environmental outcomes need to be balanced

57. One of the key issues with the RMA is the relative higher weighting of Part 2 purpose and principle matters of national importance (section 6) over other matters (section 7) which included the benefits derived from the use and development of renewable energy (7(j)).
58. The number and nature of the outcomes proposed in the Bill create a natural tension between protecting, restoring or improving the natural environmental and infrastructure services. In addition, the overlay of a prescribed minimum biophysical state or maximum amount of harm or stress permitted by environmental limits provides absolute direction with the effect of creating a hierarchy of importance.
59. NZWEA therefore considers that, under the current resource management system, the outcomes for the use of renewable energy, greenhouse gas removal and resilience to the effects of climate change is significantly less directive than for other outcomes which perpetuates existing RMA purpose and principles issues.
60. The Association considers that greater internal balance is required in the direction applicable to each outcome and in the clarity over how competing outcomes are to be balanced and supports the joint ESEG submission's proposal to strengthen and use more directive language in support of climate change mitigation and the importance of increasing renewable electricity generation.
61. NZWEA suggests that the outcomes related to renewable energy and climate change (objectives "(o)" and "(p)") should be refocussed so that renewable generation is not simply an 'infrastructure' matter. Instead, there should be clear recognition of the role of renewable energy in achieving climate change outcomes.

Conflict Resolution

62. The Association notes the comments in the Parliamentary Paper on conflict resolution and that where possible the NPF will resolve conflicts or give direction.
63. The Association references the ESEG submission's comments (para 20) that, given the effective weighting of outcomes towards environmental considerations, with specific environmental limits, further attention should be given to ensuring needed infrastructure services can be provided: in particular, for renewable electricity generation given its enablement of decarbonisation.

Spatial Planning – potential enabler or restriction

64. The intent of the Strategic Planning Act to promote social, economic, environmental and cultural wellbeing through a strategic approach to the integration of environmental management, land use and infrastructure is acknowledged and supported.
65. The potential for regional spatial strategies (RSS) to be an enabler of development is recognised, particularly if the consenting pathway is simplified for infrastructure development within identified areas.

66. As noted in the ESEG submission (para 26) , there is considerable complexity around the selection of locations for renewable electricity generation including availability of resources, competitive market positioning and futureproofing for technological development.
67. A decision to seek a wind farm consent in a particular location involves balancing a large number of considerations and factors including available wind resource, a detailed environmental impact and expected consentability, transmission availability, market and generator portfolio impacts, construction risks and an overall commercial assessment.
68. It is difficult to see how decision makers developing regional spatial strategies would have access to the complex technical and commercial information needed to fully assess the factors that enable lowest cost renewables development, particularly as RSS are intentionally high level in nature.
69. A key risk to future renewables development would be an overreliance on regional spatial strategies particularly if narrowly defined. There would need to be an allowance that generation development outside of identified areas should be permissible albeit with a more demanding consenting process.

Flexibility to adapt is paramount

70. The Association notes the complexity of amending primary legislation and supports an approach of having the NPF as secondary legislation.
71. Decarbonisation of the economy is at an early stage and the effects of climate change along with mitigation and adaption strategies will continue to develop.
72. New technologies will continue to be deployed such as offshore wind energy and the resource management system must have the flexibility to be able to adapt to both infrastructural and environmental opportunities.

Considerable uncertainty remains on the extent to which the NBA exposure draft meets the resource management reform objectives

73. The intent and objectives of the Resource Management Review Panel for active planning rather than managing adverse impacts is reflected in the Parliamentary Paper on the exposure draft at para 85:

Good planning can raise environmental standards as well as ensure there is sufficient housing and infrastructure to service a growing population. The system needs to recognise and encourage synergies between development and environmental protection. For example, more renewable electricity generation requires new infrastructure such as wind farms.

74. The ESEG submission has focused on the specific reform objectives of:
 - Better enabling development within environmental biophysical limits including a significant improvement in housing supply, affordability and choice, and timely provision of appropriate infrastructure, including social infrastructure.
 - Better preparation for adapting to climate change and risks from natural hazards, and better mitigate emissions contributing to climate change.

- Improving system efficiency and effectiveness, and reduce complexity, while retaining appropriate local democratic input.

75. The Parliamentary Paper highlights the difficulty of trying to form a view on the implications and effectiveness of the draft Bill particularly as the importance of the, yet to be defined, National Planning Framework and environmental limits:

Para 114 - The NBA outcomes are to be long-term and enduring. The detail on how this will be achieved will be set out in the NPF and regional plans.

Para 118 - The role of the environmental outcomes in guiding decision-making about resource consents, designations and other approvals under the NBA is yet to be decided and is not addressed in the exposure draft.

Para 122 - Conflicts between outcomes will inevitably arise in consenting decisions, including in ways that plans do not cover. It will not be feasible for the NPF and NBA plans to foresee and conclusively resolve all tensions in advance, but the full Bill will provide mechanisms for decision-makers to resolve conflicts at the consenting stage.

Para 125 - While the NBA outcomes include the reduction of greenhouse gas emissions, further work is underway to explore how the NBA can be used to make progress towards achieving New Zealand's emissions reduction goals under the CCRA .

Para 131 - The Panel recognised the important role of direction from central government on matters of national importance and recommended that the set of national direction be integrated, with conflicts between instruments resolved.

76. The ESEG's submission (para 21 and 22) highlights the risks and concerns given key NBA content is yet to be developed and the numerous references to a precautionary approach included in clauses 16 (application of a precautionary approach), 18 (Implementation principles) and 24 (Considerations relevant to planning committee decisions).

77. Without more information on the form or process for developing the NPF, the nature and extent of environmental limits or the impact of the SPA and regional spatial plans, it is not possible for the Association to form a view as to extent to which the reform objectives, including the provision of infrastructure services, are enabled. The ESEG submission does, however, based on available information, identify where risks and issues are apparent that will materially restrict the ability to develop new renewable electricity generation in support of climate change targets.

About the NZ Wind Energy Association (NZWEA)

- The NZWEA is an industry association that promotes the development of wind as a reliable, sustainable, clean and commercially viable energy source.
- We aim to fairly represent wind energy to the public, Government and the energy sector.
- Our members are involved in the wind energy sector and include electricity generators, wind farm developers, lines companies, turbine manufacturers, consulting organisations and other providers of services to the wind sector,
- By being a member of NZWEA you are assisting the development of wind energy in New Zealand and helping to reduce our greenhouse gas emissions to meet climate change targets.

The Association's strategy focuses on three key areas:

- Leveraging NZ's emission reduction imperative to enable the energy transition to renewables, particularly wind energy.
- Optimising wind energy's position and ensuring the regulatory environment supports wind farm development.
- Expanding the opportunity for wind energy development to enable community and industrial projects including wind's integration with other technologies.

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