

**Theme      Energy – Land**

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**Total number of submission points on the theme**

44 individual submission points.

**Number of submission points supporting or agreeing with the provisions in the Proposed NZCPS**

11 submissions.

**Number of submission points opposing the provisions in the Proposed NZCPS**

2 submissions.

**Note:** some submissions comment on but do not support or oppose the provisions.

**Key messages within the submissions**

1.        The NZCPS should address unsustainable features of urban sprawl, with emphasis on discouraging urban sprawl and protecting rather than developing the coastline. There is no need to encourage development in existing urban areas.
2.        Recognition for papakainga development is supported, however considered insufficient. There should be more provision for papakainga development in a manner consistent with the tikanga of appropriate tangata whenua.
3.        Form of subdivision and development policy confused as the issue seems to be what potential reclamations are for as opposed to the reclamation itself. Suggested this Policy is outside the scope of the NZCPS and should be deleted. The policy is written as if rules, and should be amended so as not to be applied or interpreted as rules.
4.        Renewable energy generation seen as to be very important in the coastal marine area, appropriate areas for development should be identified and further policy framework added to provide guidance for locating these activities.
5.        That a more stringent approach to reclamation be established ensuring reclamation occurs only when alternatives are not possible and only to the extent which allows the activity to be undertaken with any effects avoided, remedied or mitigated.
6.        Rather than managing, some development should not be allowed within the CMA at all, therefore suggested that Objective 2 be deleted.
7.        An approach was suggested that where ancillary developments to existing electrical infrastructure are proposed, assessment is as part of the existing development and not as fragmented smaller developments.
8.        It is not appropriate to identify specific sites suitable for renewable energy generation. This is a matter which should be left to electricity generators themselves.

**Additional Provisions Sought**

9.        Submission 358.26 seeks a new policy: Policy statements and plans shall provide particular guidance for locating and facilitating activities associated with renewable energy

generation within the coastal marine area and coastal environment, in recognition of the benefits of such development with regard to the matters identified in Part 2 of the RMA.

10. Submission 361.9 states that the provision and need for electricity generation and transmission is a matter critical to economic and social wellbeing and provision for such is required to meet the intent of the RMA. Adding a new objective ensures suitable recognition is given in the coastal environment or wind, tidal and wave powered generation to at least the same level as other coastal resources such as ecology, water quality, natural character and landscapes. A new objective is requested as follows:

**New Objective 11**

Recognition of opportunities, and provision for, renewable forms of energy generation and associated infrastructure including transmission.

11. Submission 361.3 raises concerns at the potentially conflicting messages in statements of national policy, particularly in relation to energy policy. The National Policy Statement on Electricity Transmission states: the matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity network. Any renewable energy development in the coastal environment will require associated transmission lines in order to connect it. Further policy support is needed in the document for renewable energy and transmission projects to better align the NZCPS with other current and emerging national policy guidance relating to the energy sector and our international obligations. Identifying key interactions between this policy document and others, such as the New Zealand Energy Strategy and the NPS on Electricity Transmission, will ensure that a clear policy direction is provided nationally on this issue.
12. Submission 361.5 states that the NZCPS does cover all use, development and protection facets of sustainable management although greater emphasis has been placed on protection aspect than on use and development. A more balanced approach is necessary for renewable energy generation and transmission. The NZCPS requires additional policy provisions to ensure an appropriate balance between use, development and protection, and to better recognise the key role that the coastal environment has in ensuring the nation's social and economic wellbeing.