

**Theme      Energy - CMA**

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

61 individual submission points.

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

15 submissions.

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

3 submissions.

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

**Key messages within the submissions**

1. 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.
2. Form of subdivision and development policy confused as 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. This policy is written as if rules, and should be amended so as not to be applied or interpreted as rules.
3. Renewable energy generation seen as to be very important in CMA with further recognition needed regarding the benefits derived from the use and development of renewable energy in the coastal environment. Appropriate areas for development should be identified and further policy framework added to provide guidance for locating these activities.
4. Support for Crown to make land in the CMA available for infrastructure of national importance associated with renewable energy generation, although clarification is required regarding 'infrastructure' and 'national importance' including weighting and priority.
5. A more stringent approach to reclamation be established ensuring reclamation be established 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. A definition of 'resilience' is required.
7. Need to give clearer direction to councils on how Crown interests are to be addressed in the coastal environment.

**Additional Provisions Sought**

8. Submission 416.2 seeks to include a new policy that requires recognition in policy statements and plans of the national significance and benefits of renewable energy in the coastal environment as well as the coastal marine area, and which requires recognition that the location of certain activities important to the social, economic and cultural well

being of people and communities such as renewable energy is prescribed by a need for proximity to a resource.

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 374.20 states that additional policies are required to emphasise the benefits to be derived from renewable energy generation and to ensure that there is support for this in policy statements and plans. The same applies to infrastructure associated with renewable energy generation such as transmission lines.
11. Submission 235.14 states that Crown land is important for infrastructure and renewable energy generation within the coastal environment as well as just within the Coastal Marine Area. Provision for renewable energy within the NZCPS is important, not just for Crown land, but for the entire coastal environment. This matter should be covered by a policy relating to 'renewable energy generation'.
12. 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.

13. Submission 324.21 and 395.26 agree that plans should address infrastructure of national importance in a consistent and integrated way, however Policy 17 does nothing in the way of additional guidance for councils when considering applications for renewable energy generation in the coastal marine area. The submitters recommend that a more effective way of dealing with the Crown's interests in Crown land would be through ensuring that the core policy framework of the NZCPS provides clear, appropriate and balanced guidance to councils. Policies 17 and 18 should be deleted and a new policy be added to provide guidance on the Crown's expectations with regard to the balancing of local and national benefits and costs, particularly as they relate to infrastructure of national importance.
14. Submission 472.49 supports the need to plan for and protect infrastructure of national importance and renewable energy generation. However they identify ambiguous provisions in the policy. If zoning is not intended, then consideration should be given to the use of section 55(2A) of the RMA. Define infrastructure of national importance.
15. Submissions 361.2 and 361.3 raise 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.

16. 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.
17. Submission 407.1 proposes a new objective should be drafted that recognises that the coastal environment has the potential for renewable energy generation and that this can (though not always) be appropriate development. The need for transmission in conjunction with this generation should also be recognised.