



6 March 2020

Via email: energymarkets@mbie.govt.nz

Dear Sir / Madam,

SUBMISSION: ACCELERATING RENEWABLE ENERGY AND ENERGY EFFICIENCY – DISCUSSION DOCUMENT

Thank you for the opportunity to present our feedback on the Accelerating Renewable Energy and Energy Efficiency discussion document. Queenstown Lakes District Council (QLDC) is fully supportive of the goals to encourage energy efficiency and the uptake of renewable energy solutions. QLDC is also broadly supportive of the proposals to address the opportunities and barriers to accelerate investment in renewable energy infrastructure.

On 27th June 2019, QLDC declared a climate and ecological emergency and a Climate Action Plan (CAP) will be tabled for adoption by Council on 12 March 2020. QLDC is highly aware of the obligations faced with regard to reducing our impact on the planet and with an ever growing population this will be a key challenge in our district. Our goals for the CAP are to achieve net zero carbon emissions across the whole district by 2050 and to be resilient to the local impact of climate change. Reducing emissions through well-designed and tested renewable energy projects with community support and encouraging energy efficiency will be central to these longer-term goals.

The Queenstown Lakes District has large areas of Outstanding Natural Landscapes and Features (ONL/F), the landscape character and amenity values of which are a significant intrinsic, economic and recreational resource. QLDC is developing a Spatial Plan which will play a part in informing the requirement for energy infrastructure (including renewables) in a way that respects this local context. The Council is aware that some of these solutions may conflict with other key community values such as landscape protection, but these values may still be compatible with smaller local and community-based projects adding resilience to the larger national renewable energy network. Such trade-offs are inevitable and will need to be transparently addressed if communities are to achieve a sustainable future.

The attached submission is the position of Council officers in relation to the discussion document and QLDC looks forward to continuing the conversation with the Ministry. Council staff may wish to speak at further hearings or to participate in any focus groups throughout this consultation process.

Thank you again for the opportunity to comment.

Yours faithfully,



Mike Theelen
Chief Executive

Development of Renewable Energy under RMA

1.0 Amendment to National Policy Statement for Renewable Electricity Generation (NPSREG)

- 1.1 QLDC is supportive of changing the language of the NPSREG to make it more directive in order to enable councils to give it more weight in decision making and for it to provide clearer direction as to how councils should provide for renewable energy projects within district plans.
- 1.2 QLDC is generally supportive of the NPSREG being amended to provide clearer direction on the matters (a – i) outlined on page 59 of the discussion document. QLDC would be concerned if (in relation to points b and i) a blanket approach is taken requiring councils to identify potential areas for renewable energy development without taking a national strategic approach in planning where energy is needed and where best to generate it.
 - 1.2.1 Districts are not homogeneous and different opportunities and constraints need to be considered. Councils are well placed to identify local issues with renewable generation and to understand their local economy, natural hazard, environmental constraints, patterns of growth and other relevant factors. They do not, and will not however, have any capacity to understand and plan for energy network infrastructure from a national or regional point of view.
 - 1.2.2 Councils would require access to a national perspective and specialist experts to inform a strategic approach in order to plan for renewable energy development.
- 1.3 This approach could facilitate renewable energy by enabling more weight to be given to the benefits of renewable energy in decision making. However, improving consistency in planning and consenting decisions would likely remain challenging due to the highly varied scales of environmental effects attributed to the different receiving environments across the country.
- 1.4 National direction on how the NPSREG would interact with other national direction instruments will be required. Furthermore, the classification of priorities between different instruments being considered would be critical for the NPSREG to be effective.

2.0 Consistent Direction of Consideration under the RMA

- 2.1 QLDC agrees that both national environmental standards (NES) or NPS for renewable energy could give strong and consistent direction on the required level of consideration under the RMA, with a lower implementation cost for projects. A NES would be more complex to develop than improving the NPS. This complexity is partly due to it having to take the difference between the regions (receiving environment) into account as well as balancing the impact on other values such as amenity or biodiversity.
- 2.2 QLDC has concerns however, that this approach could lead to a trade-off between environmental effects and renewable energy development if the specific opportunities and constraints of very different regions and districts are not fully taken into account. This could be highly detrimental in areas such as the Queenstown Lakes District with highly sensitive receiving environments and high potential needs for energy and renewable energy infrastructure.
- 2.3 The benefits of the development of renewable energy infrastructure should not be at the expense of the character and values of outstanding natural environments and features. 98% of the Queenstown Lakes District is comprised of ONL/F and while there is support for clearer direction in the development of renewable energy infrastructure (often situated in highly visible places in the case of

wind turbines and dams), the importance of the natural landscape must not be undersold. The value of these landscapes and natural places may outweigh the benefits to be derived from these areas being used for renewable energy production. Innovative solutions and prioritising energy efficiency before energy production will be key in this regard. With the district being New Zealand's premier visitor destination, sustainability, resilience and landscape protection must all be fully considered as these are values visitors and residents aspire to.

Infrastructure Investment

3.0 Renewable Energy Planning and Strategies

- 3.1 QLDC sees strong merit in a robust spatial planning approach and is currently undertaking a comprehensive spatial planning exercise in partnership with iwi and central government. Specifically, spatial planning could be incorporated on a national scale which will be able to consider the opportunities, constraints and energy demand of specific regions and districts. The spatial plan will then be able to inform the NPSREG or NES and could prescribe what specific regions/districts need to provide for within their spatial or district plans and regional plans.
- 3.2 QLDC requests clarity regarding the proposal to require publication of Corporate Energy Transition Plans from large energy users and for those users to conduct energy audits every four years. As a Council that services a large number of visitors to our district as well as our resident population, QLDC meets the threshold for a large energy user and therefore would like to understand the impacts that this will have on local council annual and long-term planning budgets.
- 3.3 QLDC supports the proposal for government incentivising energy efficiency measures for consumers in the form retailer/distributor obligations to reduce the cost of energy efficient products and services. This in tandem with education and making information available to households and businesses on how to reduce inefficiencies and therefore increase energy savings will help to reduce energy requirement overall prior to the implementation of renewable energy generation infrastructure.

4.0 Resilient Renewable Energy Infrastructure

- 4.1 QLDC recognises that a number of opportunities provide different avenues towards creating a strong renewable energy network. The Queenstown Lakes District is a high growth area with population projections showing the region nearly doubling in size to approximately 75,000 residents by 2050. Any renewable energy infrastructure must be created with community growth in mind and should be scalable in this regard to provide efficient, renewable energy for all into the future.
- 4.2 QLDC believes that resilient renewable energy infrastructure includes both national and local suppliers working towards New Zealand's renewable energy goals. Opportunities should be available for consent holders to connect to local and community suppliers where available and practicable to alleviate the reliance on third party infrastructure. Network companies will be required to support local and community schemes so that renewable energy will be available across all parts of the country.

Community and Resilience

5.0 Framework for Local Community Engagement

- 5.1 QLDC would be supportive of government creating a clear and consistent position on community energy issues through a work programme of research and innovation. The national standard reached would provide a strong and tested reference point for community projects which will ensure quality and enable cost effective and reliable solutions. A system for continued support of community projects should be included in the framework to ensure sustainability of these solutions.
- 5.2 QLDC accepts that a national standard for community energy will take some time to accomplish, however in the short term a suite of pilot energy projects supported by government would initiate the process and provide invaluable data which will aid the development of a national framework.

6.0 Community Energy Self-Provision

- 6.1 Within a proposed framework, QLDC would welcome government support for community energy self-provision, including disaster readiness and recovery in light of the increasing vulnerability of communities due to extreme weather events and civil defence emergencies. This should align with the actions and outcomes of the National Disaster Resilience Strategy.
 - 6.1.1 Funding directed towards self-sufficient community energy schemes would be welcomed particularly in areas that have the potential to be isolated by civil defence emergencies. This would include provisions for peer-to-peer energy schemes which could provide vital services to isolated communities.
 - 6.1.2 Community energy scheme considerations should be incorporated into lifeline and risk management frameworks for emergency management as there will be better outcomes in these situations when communities are working resiliently.