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General comments and the appropriateness of achieving the purpose of the RMA / objectives.

Proposed Energy Sub-Chapter Provisions

The purpose of the development of this Sub-Chapter is to remove any confusion as to the application of the energy versus the infrastructure chapters of the proposed RPS, protect existing renewable electricity generation facilities and to provide a clear and viable pathway for new renewable electricity generation activities to be appropriately considered on a merits-based assessment. Renewable electricity generation facilities provide significant social and economic benefits, and the ongoing use and development of such activities will assist in achieving New Zealand's decarbonisation goals. The proposed objectives are therefore directly aligned with achieving the sustainable management purpose of the RMA.

Social and Cultural Benefits

Significant environmental benefits will accrue from the ongoing use and development of new renewable electricity generation facilities in line with these provisions. This will assist significantly in climate change mitigation and decarbonisation goals. In turn, this will have positive impacts on communities and biodiversity.

- The provisions will allow the social and economic wellbeing of the community to be provided for by protecting existing renewable electricity generation facilities and supporting the development of new.
- The provisions will remove any unnecessary confusion as to whether the infrastructure and/or the energy provisions

Environmental, Cultural, Economic, Environmental, Economic, Social and Effectiveness and Efficiency Cultural Costs

- The provisions may result in the development of new renewable electricity generation facilities in areas with natural and potentially significant values. However, the provisions also seek to ensure that the effects will be managed as appropriate.
- The provisions may restrict the establishment of some land use and development activities where they may conflict with existing renewable electricity generation facilities.
- The provisions seek to establish a stand-alone sub-chapter specific to renewable electricity generation activities. This is efficient as it seeks to remove any confusion and potential conflicts between the energy and infrastructure chapters of the RPS.
- The provisions are effective at providing for renewable electricity generation activities and recognising its significance.
- The provisions are clear in giving effect to the NPSFM and NPSREG. which is both effective and efficient.
- The provisions are effective in striking the necessary balance of seeking to provide for renewable electricity generation activities, while also seeking to ensure adverse effects arising are appropriately managed.

- apply to these activities and establish clear parameters for such activities operating and being developed within the Otago region.
- The provisions give effect to both the NPSREG and the NPSFM, for the reasons set out in my evidence.
- The provisions recognise the importance of existing nationally significant assets that operate within the Otago region, including the CHS. The importance of the CHS is explained in the evidence of Ms Nelson and Mr Hunt.
- The provisions ensure that the adverse effects arising from the development of new facilities will be appropriately managed.
- Existing facilities will be protected from reverse sensitivity effects, which could potentially constrain their existing operational capacity and future development.