



APPENDIX 19 NATIONAL POLICY STATEMENTS ASSESSMENT



NATIONAL POLICY STATEMENTS ASSESSMENT



**138 Hectare / 100 MW Agrivoltaic Development, including Battery Energy
Storage System**

3954A State Highway 2, Waingawa

29 February 2024

1.0 SITE DETAILS

Feature	Site
Address	3954A State Highway 2, Waingawa
Legal Description and Title	Pt Lot 2 DP 2099 (RT WNF1/1189) Pt Lot 3 DP 2099 (RT WNF1/1188) Pt Lot 1 DP 46533 (RT WN17B/749) Lot 1 DP 19148 (RT WN765/45) Pt Lot 4 DP 2099 (RT WND1/413) Lot 1 DP 17189 (RT WN638/13) Lot 1 DP 3447 (RT WN248/15) Pt Lot 4 DP 2099 (RT WN213/272)
Proposal Description	Construct and operate an agrivoltaic development that will occupy approximately 138ha of the subject site, and will include erecting photovoltaic modules, inverters, transformers, battery energy storage system (BESS), a substation, and a site office, as well as establishing a connection to the nearby TransPower Masterton Substation

2.0 NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

Clause #	Clause Text
Part 1: Preliminary provisions	
1.3 Fundamental concept – Te Mana o te Wai	
(1)	Concept Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. It protects the mauri of the wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community.
(2)	Te Mana o te Wai is relevant to all freshwater management and not just to the specific aspects of freshwater management referred to in this National Policy Statement.
(3)	Framework Te Mana o te Wai encompasses 6 principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this National Policy Statement and its implementation.
(4)	The 6 principles are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligations of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others (d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future (e) Stewardship: the obligations of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations

	(f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.
(5)	<p>There is a hierarchy of obligations in Te Mana o te Wai that prioritises:</p> <ul style="list-style-type: none"> (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
<p>Comments:</p> <p><i>The proposal will not adversely affect the health of the freshwater resources that are located within and adjacent to the subject site.</i></p> <p><i>The proposal takes into consideration a holistic approach to avoiding impacts on freshwater –</i></p> <ul style="list-style-type: none"> - <i>Through the implementation of appropriate sediment and erosion control measures during construction,</i> - <i>Through the adoption of a stormwater management strategy, and</i> - <i>Through having all PV modules located at least 10m from the edges of all of the freshwater resources that are located within the site.</i> <p><i>The Applicant is currently undertaking consultation with the two iwi who are identified as mana whenua for this locality, in recognition of the principles of mana whakahaere, kaitiakitanga, and manaakitanga. The Applicant has also had conversations with both the District and Regional Council to ensure that our approach to protection around the freshwater resources is appropriate in recognition of each of their decision-making roles for this proposal.</i></p> <p><i>In applying the above measures, the proposal will be consistent with the three priorities for Te Mana o te Wai.</i></p>	
Part 2: Objective and policies	
2.1 Objective	
Objective 1:	<p>The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</p> <ul style="list-style-type: none"> (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
<p>Comments:</p> <p><i>As is outlined within the application and supporting documents, the proposal intends to achieve the priorities of protect the health and well-being of the water bodies and freshwater ecosystems within the site; the health and needs of people; and the ability of people and communities to provide for their social, economic and cultural well-being now and into the future.</i></p> <p><i>The proposal seeks to maintain the current health and well-being of the freshwater resources and their ecosystems within the site (the Taratahi water race and the various natural inland wetlands). This will be achieved through implementing suitable sediment and erosion control measures during construction of the proposal. Adhering to the stormwater management strategy is proposed while the development is operational. Both of these measures seek to avoid the discharge of contaminants and suspended sediment to the water bodies avoid shading by maintaining a minimum 10m setback from the edge of these resources to the nearest PV modules and other structures.</i></p> <p><i>The subject site is not located within any identified municipal water supply protection areas by the Regional Council. Combined with other means to avoid any contamination of surface water as outlined above, and management measures that will be implemented to avoid mobilisation of contaminants in the area of the site identified as HAIL, the proposal is not anticipated to alter the health needs of people.</i></p> <p><i>The proposal will provide for the social, economic and cultural well-being through contributing towards increasing the amount of energy generated from renewable sources and reducing the</i></p>	

adverse effects of climate change. It will also provide economic opportunities through increased employment during both construction of the development and, to a lesser extent, once it is operational.

2.2 Policies

Policy 1:	Freshwater is managed in a way that gives effect to Te Mana o te Wai.
Policy 2:	Tangata whenua are actively involved in freshwater management (including decisionmaking processes), and Māori freshwater values are identified and provided for.
Policy 3:	Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.
Policy 4:	Freshwater is managed as part of New Zealand’s integrated response to climate change.
Policy 5:	Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.
Policy 6:	There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.
Policy 7:	The loss of river extent and values is avoided to the extent practicable.
Policy 8:	The significant values of outstanding water bodies are protected.
Policy 9:	The habitats of indigenous freshwater species are protected.
Policy 10:	The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.
Policy 11:	Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.
Policy 12:	The national target (as set out in Appendix 3) for water quality improvement is achieved.
Policy 13:	The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.
Policy 14:	Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenges to their health and well-being, is regularly reported on and published.
Policy 15:	Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement

Comments:

As outlined with regards to Objective 1 above, the proposal gives effect to Te Mana o te Wai. The Applicant has begun consultation with mana whenua, which will continue throughout the processing of this resource consent application. Further, it is anticipated that both mana whenua will be involved in the processing of the application through the District Council’s processing of the application. It is anticipated that the involvement of mana whenua in this development will extend beyond the processing of this application, into the construction phase, and ultimately, right through to the decommissioning of the development on the site.

It is anticipated that the proposal incorporates a catchment-wide management approach through the processing of this application by both the District and Regional Councils. The proposal is a direct result of the Applicant seeking to positively contribute towards our national response to climate change through the decarbonisation of our energy supply while also accommodating increasing electrification of many former carbon-based activities such as transportation.

None of the freshwater resources within the development area are identified as degraded water bodies for improvement. As outlined above, it is anticipated that the proposal will at least maintain the current health and well-being of the freshwater resources within the site.

The proposal does not seek to reduce the extent of any natural inland wetlands. Further, through implementation of the measures outlined above, it is anticipated that the current values and health of these resources is protected to at least their current standard. The only watercourse identified as a river within the subject site is the Taratahi water race, which is maintained by the District Council as a modified watercourse that has a forced flow rate. The proposal does not seek to further degrade the values of this river. There are no outstanding water bodies within or adjacent to the site.

As noted within the Ecological Assessment (Appendix 12), the proposal will not adversely affect habitats of any indigenous freshwater species that utilise the freshwater resources within the site. The subject site is not a known habitat for trout or salmon.

The proposal may require a water take consent to fulfil the proposals initial needs for water supply (predominantly associated with the provision of water for on-site rural firefighting purposes, and, to a lesser extent, maintenance of PV modules). This is intended to be addressed by a municipal supply that is proposed for the adjacent industrial area, once established.

For the reasons that have previously been outlined in regard to this NPS, it is not anticipated that the proposal will adversely affect water quality for this locality.

The monitoring of the condition of water bodies and freshwater ecosystems, combined with any associated reporting on the state of such resources, is a responsibility best suited to the Regional Council.

Part 3: Implementation

Subpart 1 Approaches to implementing the National Policy Statement

3.2 Te Mana o te Wai	Comments: <i>These clauses relate to actions to be undertaken by the Regional Council and are therefore not relevant to this proposal.</i>
3.3 Long-term visions for freshwater	
3.4 Tangata whenua involvement	

3.5 Integrated management

(1)	Adopting an integrated approach, ki uta ki tai, as required by Te Mana o te Wai, requires that local authorities must: <ul style="list-style-type: none"> (a) recognise the interconnectedness of the whole environment, from the mountains and lakes, down the rivers to hāpua (lagoons), wahapū (estuaries) and to the sea; and (b) recognise interactions between freshwater, land, water bodies, ecosystems, and receiving environments; and (c) manage freshwater, and land use and development, in catchments in an integrated and sustainable way to avoid, remedy, or mitigate adverse effects, including cumulative effects, on the health and well-being of water bodies, freshwater ecosystems, and receiving environments; and (d) encourage the co-ordination and sequencing of regional or urban growth.
(2)	Every regional council must make or change its regional policy statement to the extent needed to provide for the integrated management of the effects of: <ul style="list-style-type: none"> (a) the use and development of land on freshwater; and (b) the use and development of land and freshwater on receiving environments.
(3)	In order to give effect to this National Policy Statement, local authorities that share jurisdiction over a catchment must co-operate in the integrated management of the effects of land use and development on freshwater.
(4)	Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.

Comments:
It is considered, for the reasons outlined above in relation to this proposal and this NPS, that the

proposal will achieves outcomes consistent with an integrated management approach to resource management. Through the various means of measures to avoid, remedy, and mitigate adverse effects from the proposal, this will ensure that even those aspects of the proposal that may not directly interact with freshwater resources will not adversely affect the values and well-being of the freshwater resources within and adjacent to the subject site.

3.6 Transparent decision-making	Comments:
Subpart 2 National Objectives Framework	<i>These clauses relate to actions to be undertaken by the Regional Council and are therefore not relevant to this proposal.</i>

Subpart 3 Specific requirements

3.21 Definitions relating to wetlands and rivers [only including one key definition]
Effects management hierarchy, in relation to natural inland wetlands and rivers, means an approach to managing the adverse effects of an activity on the extent or values of a wetland or river (including cumulative effects and loss of potential value) that requires that:

- (a) adverse effects are avoided where practicable; then
- (b) where adverse effects cannot be avoided, they are minimised where practicable; then
- (c) where adverse effects cannot be minimised, they are remedied where practicable; then
- (d) where more than minor residual adverse effects cannot be avoided, minimised, or remedied, aquatic offsetting is provided where possible; then
- (e) if aquatic offsetting of more than minor residual adverse effects is not possible, aquatic compensation is provided; then
- (f) if aquatic compensation is not appropriate, the activity itself is avoided

3.22 Natural inland wetlands

(1)	<p>Every regional council must include the following policy (or words to the same effect) in its regional plan: “The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where:</p> <ul style="list-style-type: none"> (a) the loss of extent or values arises from any of the following: <ul style="list-style-type: none"> (i) the customary harvest of food or resources undertaken in accordance with tikanga Māori (ii) wetland maintenance, restoration, or biosecurity (as defined in the National Policy Statement for Freshwater Management) (iii) scientific research (iv) the sustainable harvest of sphagnum moss (v) the construction or maintenance of wetland utility structures (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020) (vi) the maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (vii) natural hazard works (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020); or (b) the regional council is satisfied that: <ul style="list-style-type: none"> (i) the activity is necessary for the purpose of the construction or upgrade of specified infrastructure; and (ii) the specified infrastructure will provide significant national or regional benefits; and (iii) there is a functional need for the specified infrastructure in that location; and (iv) the effects of the activity are managed through applying the effects management hierarchy; or (c) the regional council is satisfied that:
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	<ul style="list-style-type: none"> (i) the activity is necessary for the purpose of urban development... (d) the regional council is satisfied that: <ul style="list-style-type: none"> (i) the activity is necessary for the purpose of quarrying activities... (e) the regional council is satisfied that: <ul style="list-style-type: none"> (i) the activity is necessary for the purpose of: <ul style="list-style-type: none"> (A) the extraction of minerals (other than coal) and ancillary activities; or (B) the extraction of coal and ancillary activities as part of the operation or extension of an existing coal mine... (f) the regional council is satisfied that: <ul style="list-style-type: none"> (i) the activity is necessary for the purpose of constructing or operating a new or existing landfill or cleanfill area...
(2)	<p>Subclause (3) applies to an application for a consent for an activity that:</p> <ul style="list-style-type: none"> (a) is for a purpose referred to in subclause (1)(a) to (f), other than the purpose referred to in paragraph (1)(a)(i); and (b) would result (directly or indirectly) in the loss of extent or values of a natural inland wetland.
(3)	<p>Every regional council must make or change its regional plan to ensure that an application referred to in subclause (2) is not granted unless:</p> <ul style="list-style-type: none"> (a) the council is satisfied that: <ul style="list-style-type: none"> (i) the applicant has demonstrated how each step of the effects management hierarchy will be applied to any loss of extent or values of the wetland (including cumulative effects and loss of potential value), particularly (without limitation) in relation to the values of: ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values, and amenity values; and (ii) if aquatic offsetting or aquatic compensation is applied, the applicant has complied with principles 1 to 6 in Appendix 6 and 7, and has had regard to the remaining principles in Appendix 6 and 7, as appropriate, and (iii) there are methods or measures that will ensure that the offsetting or compensation will be maintained and managed over time to achieve the conservation outcomes; and (b) any consent granted is subject to: <ul style="list-style-type: none"> (i) conditions that apply the effects management hierarchy; and (ii) a condition requiring monitoring of the wetland at a scale commensurate with the risk of the loss of extent or values of the wetland; and (iii) conditions that specify how the requirements in (a)(iii) will be achieved.
(4)	<p>Every regional council must make or change its regional plan to include objectives, policies, and methods that provide for and promote the restoration of natural inland wetlands in its region, with a particular focus on restoring the values of ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values, and amenity values.</p>

Comments:

The proposal will not result in the loss of extent of natural inland wetlands. Further, their values will be protected as a result of this proposal. This is despite the proposal being exempt to the above as specified infrastructure under Clause 3.22(1)(a)(vi). In light of the assessment matters for the Regional Council under Clause 3.22(1)(b), the proposal is for the construction of specified infrastructure that is of a scale that will provide for regional benefit and has a functional need to be located in this location, due to the combination of gentle ground contour, proximity to the National Grid (via the Masterton substation) and being located within a rural environment.

The proposal is not anticipated to result in any adverse effects on the health, well-being, or extent of

the natural inland wetlands within the subject site. Therefore, it is not considered necessary to consider the proposal in relation to the effects hierarchy of Clause 3.21.

3.23 Mapping and monitoring natural inland wetlands	Comments: <i>This clause relates to actions to be undertaken by the Regional Council and is therefore not relevant to this proposal.</i>
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3.24 Rivers

(1)	Every regional council must include the following policy (or words to the same effect) in its regional plan: “The loss of river extent and values is avoided, unless the council is satisfied that: (a) there is a functional need for the activity in that location; and (b) the effects of the activity are managed by applying the effects management hierarchy.”
(2)	Subclause (3) applies to an application for a consent for an activity: (a) that falls within the exception to the policy described in subclause (1); and (b) would result (directly or indirectly) in the loss of extent or values of a river.
(3)	Every regional council must make or change its regional plan to ensure that an application referred to in subclause (2) is not granted unless: (a) the council is satisfied that: (i) the applicant has demonstrated how each step in the effects management hierarchy will be applied to any loss of extent or values of the river (including cumulative effects and loss of potential value), particularly (without limitation) in relation to the values of: ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values, and amenity; and (ii) if aquatic offsetting or aquatic compensation is applied, the applicant has complied with principles 1 to 6 in Appendix 6 and 7, and has had regard to the remaining principles in Appendix 6 and 7, as appropriate; and (iii) there are methods or measures that will ensure that the offsetting or compensation will be maintained and managed over time to achieve the conservation outcomes; and (b) any consent granted is subject to: (i) conditions that apply the effects management hierarchy; and (ii) conditions that specify how the requirements in (a)(iii) will be achieved.
(4)	Every regional council must: (a) develop and undertake a monitoring plan: (i) to monitor the condition of its rivers; and (ii) that contains sufficient information to enable the council to assess whether its policies, rules, and methods are ensuring no loss of extent or values of the rivers; and (b) have methods to respond if loss of extent or values is detected.

Comments:
The proposal does not seek to reduce the extent of the river that traverses the development area (identified as the Taratahi water race).

3.25 Deposited sediment in rivers	Comments: <i>The proposal does not seek to deposit sediment into the river within the subject site. Further, there are a number of mitigation measures proposed to prevent this occurring as part of the sediment and erosion control.</i>
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3.26 Fish passage	
(1)	Every regional council must include the following fish passage objective (or words to the same effect) in its regional plan: “The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages, or their habitats.”
(2)	Every regional council must make or change its regional plan to include policies that: <ul style="list-style-type: none"> (a) identify the desired fish species, and their relevant life stages, for which instream structures must provide passage; and (b) identify the undesirable fish species whose passage can or should be prevented; and (c) identify rivers and receiving environments where desired fish species have been identified; and (d) identify rivers and receiving environments where fish passage for undesirable fish species is to be impeded in order to manage their adverse effects on fish populations upstream or downstream of any barrier.
(3)	When developing the policies required by subclause (2) a regional council must: <ul style="list-style-type: none"> (a) take into account any Freshwater Fisheries Management Plans and Sports Fish and Game Management Plans approved by the Minister of Conservation under the Conservation Act 1987; and (b) seek advice from the Department of Conservation and statutory fisheries managers regarding fish habitat and population management.
(4)	Every regional council must make or change its regional plan to require that regard is had to at least the following when considering an application for a consent relating to an instream structure: <ul style="list-style-type: none"> (a) the extent to which it provides, and will continue to provide for the foreseeable life of the structure, for the fish passage objective in subclause (1) (b) the extent to which it does not cause a greater impediment to fish movements than occurs in adjoining river reaches and receiving environments (c) the extent to which it provides efficient and safe passage for fish, other than undesirable fish species, at all their life stages (d) the extent to which it provides the physical and hydraulic conditions necessary for the passage of fish (e) any proposed monitoring and maintenance plan for ensuring that the structure meets the fish passage objective in subclause (1) now and in the future.
(5)	Every regional council must make or change its regional plan to promote the remediation of existing structures and the provision of fish passage (other than for undesirable fish species) where practicable.
(6)	Every regional council must prepare an action plan to support the achievement of the fish passage objective in subclause (1), and the action plan must, at a minimum: <ul style="list-style-type: none"> (a) set out a work programme to improve the extent to which existing instream structures achieve the fish passage objective; and (b) set targets for remediation of existing instream structures; and (c) achieve any environmental outcomes and target attribute states relating to the abundance and diversity of fish.
(7)	The work programme in an action plan must, at a minimum: <ul style="list-style-type: none"> (a) identify instream structures in the region by recording, for each structure: <ul style="list-style-type: none"> (i) all the information in Part 1 of Appendix 4; and (ii) any other information about the structure, such as the information in Part 2 of Appendix 4; and

	<ul style="list-style-type: none"> (b) evaluate the risks that instream structures present as an undesirable barrier to fish passage; and (c) prioritise structures for remediation, applying the ecological criteria described in table 5.1 of the New Zealand Fish Passage Guidelines (see clause 1.8); and (d) document the structures or locations that have been prioritised, the remediation that is required to achieve the desired outcome, and how and when this will be achieved; and (e) identify the structures that have been remediated since the commencement date; and (f) specify how the ongoing performance of remediated structures will be monitored and evaluated, including the effects of the structure on the abundance and diversity of desired fish species.
(8)	An action plan for fish passage may be part of, or separate from, an action plan prepared for any purpose under this Part, but clause 3.15, about preparing action plans, applies in either case.
<p>Comments: <i>As outlined within the Ecological Assessment (Appendix 12) and the Stormwater Management Plan (Appendix 14), it is proposed to include fish passage within the detailed design of the three new culverts sought to be established within the bed of the Taratahi water race. The design of the fish passage mechanisms to be utilised will be developed in accordance with industry guidance and best practice, and with input from a suitably qualified and experienced freshwater ecologist. Therefore, it is considered that the proposal will achieve fish passage outcomes that are consistent with those sought under these clauses.</i></p>	
3.27 Primary contact sites	<p>Comments: <i>The subject site does not include any of the listed features outlined within this clause. This clause is therefore not relevant.</i></p>
3.28 Water allocation	<p>Comments: <i>Comment from Greater Wellington Regional Council regarding the most appropriate means for addressing the developments water demands is pending. However, it is noted that this clause relates to obligations and actions for the Regional Council to undertaken and is therefore not relevant to this proposal.</i></p>
3.29 Freshwater accounting systems	<p>Comments: <i>The proposal does not include any of the listed activities and the subject site does not include any of the listed features outlined within these clauses. These clauses are therefore not relevant.</i></p>
3.30 Assessing and reporting	
3.31 Large hydro-electric generation schemes	
3.32 Naturally occurring processes	
3.33 Specified vegetable growing areas	
3.34 Urban development in the Bay of Plenty	
Part 4: Timing and transitionals	<p>Comments: <i>This clause relates to actions to be undertaken by the Regional Council and are therefore not relevant to this proposal.</i></p>

3.0 NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND

Clause #	Preliminary provisions
Section 2: Objective & Policies	
2.1 Objective	
Objective:	Highly productive land is protected for use in land-based primary production, both now and for future generations.
Comments: <i>As outlined within the Land Use Capability Assessment (Appendix 9), 45.6% of the subject site is comprised of highly productive land, to which this NPS applies. The proposal includes maintaining the existing land-based primary production activities, through including sheep grazing under and around the panels. Therefore, it is considered that the proposal will be consistent with this objective.</i>	
2.2 Policies	
Policy 1:	Highly productive land is recognised as a resource with finite characteristics and longterm values for land-based primary production.
Policy 2:	The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.
Policy 3:	Highly productive land is mapped and included in regional policy statements and district plans.
Policy 4:	The use of highly productive land for land-based primary production is prioritised and supported.
Policy 5:	The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.
Policy 6:	The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.
Policy 7:	The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.
Policy 8:	Highly productive land is protected from inappropriate use and development.
Policy 9:	Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.
Comments: <i>The proposal seeks to develop an activity that is not a land-based primary production activity (solar energy generation, supported by battery energy storage and associated infrastructure). However, it is proposed to retain use of most of the development area for land-based primary production activities, being sheep grazing. Approximately 0.25% of the subject site is proposed to be occupied by buildings. Most of these proposed buildings, and the additional associated hardstand areas, are proposed to be located within the 54.4% of the site not identified as highly productive land. Therefore, it is considered that the proposal suitably recognises and protects the area of highly productive land as such in accordance with these policies.</i>	
Section 3: Implementation	
3.2 Integrated management	
(1)	Regional councils and territorial authorities must identify highly productive land, and manage the effects of subdivision, use, and development of highly productive land, in an integrated way, which means: (a) considering how land-based primary production, including supporting activities, interact with freshwater management at a catchment level; and

	<ul style="list-style-type: none"> (b) providing co-ordinated management and control of the subdivision, use, and development on highly productive land across administrative boundaries within and between regions; and (c) taking a long-term, strategic approach to protecting and managing highly productive land for future generations.
<p>Comments: <i>The Greater Wellington Regional Council has not yet identified highly productive land in accordance with this provision. Instead, the transitional method for highly productive land identification under the NPS-HPL was utilised, and approximately 45.6% of the total site area is considered to be highly productive land. The proposal will utilise most of this part of the subject site for a combination of solar energy generation and sheep grazing, and thus accommodate a land-based primary production activity. Further, due to the proposal being specified infrastructure, and achieving outcomes consistent with those for consideration for exempt activities, it is considered that the proposal is exempt from avoiding occurring on highly productive land. The proposal will also include the eventual decommissioning and reinstatement of the site to its current state. All of these points will achieve outcomes consistent with those anticipated under the provisions of this clause.</i></p>	
<p>3.3 Tangata whenua involvement</p>	
(1)	In giving effect to this National Policy Statement through regional policy statements, regional plans, and district plans, every local authority must actively involve tangata whenua (to the extent they wish to be involved).
(2)	<p>The active involvement must include consultation with tangata whenua that is:</p> <ul style="list-style-type: none"> (a) early, meaningful and, as far as practicable, in accordance with tikanga Māori; and (b) undertaken at the appropriate levels of whānau, hapū, and iwi decision-making structures, recognising that: <ul style="list-style-type: none"> (i) some delegates will have to represent the interests and perspectives of more than one group; and (ii) some committees are not always fully representative of every iwi and hapū in the region; and (iii) each constituent group will continue to be entitled to make submissions on notified plans and retain all other rights to be heard and have standing for appeals.
<p>Comments: <i>The Applicant has begun consultation with the two mana whenua for this locality, Rangitāne o Wairarapa and Ngati Kahungunu ki Wairarapa. It is acknowledged that this consultation process is in its infancy and will be on-going for the duration of this proposal. As such, while not completely consistent, the proposal is moving towards being consistent with this clause.</i></p>	
<p>3.4 Mapping highly productive land</p> <p>3.5 Identifying highly productive land in regional policy statements and district plans</p> <p>3.6 Restricting urban rezoning of highly productive land</p> <p>3.7 Avoiding rezoning of highly productive land for rural lifestyle</p> <p>3.8 Avoiding subdivision of highly productive land</p>	<p>Comments: <i>These clauses relate to actions to be undertaken by the Regional Council and are therefore not relevant to this proposal.</i></p>
<p>3.9 Protecting highly productive land from inappropriate use and development</p>	
(1)	Territorial authorities must avoid the inappropriate use or development of highly productive land that is not land-based primary production.

(2)	<p>A use or development of highly productive land is inappropriate except where at least one of the following applies to the use or development, and the measures in subclause (3) are applied:</p> <ul style="list-style-type: none"> (a) it provides for supporting activities on the land: (b) it addresses a high risk to public health and safety: (c) it is, or is for a purpose associated with, a matter of national importance under section 6 of the Act: (d) it is on specified Māori land: (e) it is for the purpose of protecting, maintaining, restoring, or enhancing indigenous biodiversity: (f) it provides for the retirement of land from land-based primary production for the purpose of improving water quality: (g) it is a small-scale or temporary land-use activity that has no impact on the productive capacity of the land: (h) it is for an activity by a requiring authority in relation to a designation or notice of requirement under the Act: (i) it provides for public access: (j) it is associated with one of the following, and there is a functional or operational need for the use or development to be on the highly productive land: <ul style="list-style-type: none"> (i) the maintenance, operation, upgrade, or expansion of specified infrastructure: (ii) the maintenance, operation, upgrade, or expansion of defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990: (iii) mineral extraction that provides significant national public benefit that could not otherwise be achieved using resources within New Zealand: (iv) aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved using resources within New Zealand.
(3)	<p>Territorial authorities must take measures to ensure that any use or development on highly productive land:</p> <ul style="list-style-type: none"> (a) minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and (b) avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development.
(4)	<p>Territorial authorities must include objectives, policies, and rules in their district plans to give effect to this clause.</p>
<p>Comments: <i>As outlined within the Land Use Capability Assessment (Appendix 9), the proposal is considered to be an exempt activity under Clause 3.9(2)(j)(1), as specified infrastructure, which has a functional and operational need to be in this location. The location is in close proximity to a viable connection point to the national grid (Masterton substation), which has sufficient capacity in this location. The subject site also has appropriate ground contours and solar irradiation levels.</i> <i>In relation to Clause 3.9(3), the proposal will result in less than minor productive capacity effects, which are all limited to within the 40-year duration of the development. This prevents the proposal representing a long-term cumulative loss of highly productive land within the District. The proposal is not sensitive to existing rural activities within this location and is therefore not anticipated to result in reverse sensitivity effects.</i> <i>Overall, it is considered that this proposal is consistent with the various matters to consider for a</i></p>	

<i>development to be appropriate on highly productive land.</i>	
3.10 Exemption for highly productive land subject to permanent or long-term constraints	Comments: <i>This clause relates to activities that are not part of this proposal and is therefore not relevant to this proposal.</i>
3.11 Continuation of existing activities	
(1)	Territorial authorities must include objectives, policies, and rules in their district plans to: (a) enable the maintenance, operation, or upgrade of any existing activities on highly productive land; and (b) ensure that any loss of highly productive land from those activities is minimised.
(2)	In this clause, existing activity means an activity that, at the commencement date: (a) is a consented activity, designated activity, or an activity covered by a notice of requirement; or (b) has an existing use of land or activity protected or allowed by section 10 or section 20A of the Act.
Comments: <i>The proposal will enable the landowner to continue their existing land-based primary production activities within the site, by grazing sheep around the PV modules, and through excluding the woolshed, sheep yards, and associated farm vehicle and implement sheds from the development area. Therefore, the proposal will be consistent with this clause.</i>	
3.12 Supporting appropriate productive use of highly productive land	Comments: <i>These clauses relate to actions to be undertaken by the District and Regional Councils and are therefore not relevant to this proposal.</i>
3.13 Managing reverse sensitivity and cumulative effects	
Section 4: Timing	

4.0 NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

Clause #	Clause Text
Part 1: Preliminary provisions	
Section 1.7 Maintaining indigenous biodiversity	
(1)	Maintaining indigenous biodiversity requires: (a) the maintenance and at least no overall reduction of all the following: (i) the size of populations of indigenous species: (ii) indigenous species occupancy across their natural range: (iii) the properties and function of ecosystems and habitats used or occupied by indigenous biodiversity: (iv) the full range and extent of ecosystems and habitats used or occupied by indigenous biodiversity: (v) connectivity between, and buffering around, ecosystems used or occupied by indigenous biodiversity: (vi) the resilience and adaptability of ecosystems; and (b) where necessary, the restoration and enhancement of ecosystems and habitats.
Comments: <i>The proposal is supported by an Ecological Assessment (Appendix 12), which identifies the development area including potential habitat for long-tailed bats, and several species of indigenous geckos and skinks. While the proposal does seek to trim or remove many of the trees identified as</i>	

potential roosts for the bats, it is acknowledged that additional mitigation for this loss of habitat may be required. Once site-wide bat monitoring has been undertaken (prior to works commencing), a bat management plan will be developed in accordance with relevant DoC requirements and this will confirm what, if any, additional mitigation measures are required.

With regards to potential herpetofauna habitat, these areas are proposed to be avoided during the detailed design for the internal site access network and positioning of PV tracking table poles.

Part 2: Objective and policies

2.1 Objective

(1)	<p>The objective of this National Policy Statement is:</p> <ul style="list-style-type: none"> (a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and (b) to achieve this: <ul style="list-style-type: none"> (i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and (iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.
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Comments:

It is considered that the proposal achieves a balance between maintaining indigenous biodiversity within the site against providing for the social, economic and cultural wellbeing of people and the communities through provision of a new renewable energy generation facility. As such, it is considered that this proposal will result in outcomes largely consistent with those sought under this objective.

2.2 Policies

Policy 1:	Indigenous biodiversity is managed in a way that gives effect to the decisionmaking principles and takes into account the principles of the Treaty of Waitangi.
Policy 2:	<p>Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:</p> <ul style="list-style-type: none"> (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity.
Policy 3:	A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.
Policy 4:	Indigenous biodiversity is managed to promote resilience to the effects of climate change.
Policy 5:	Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.
Policy 6:	Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.
Policy 7:	SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.
Policy 8:	The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.
Policy 9:	Certain established activities are provided for within and outside SNAs.

Policy 10:	Activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.
Policy 11:	Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.
Policy 12:	Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.
Policy 13:	Restoration of indigenous biodiversity is promoted and provided for.
Policy 14:	Increased indigenous vegetation cover is promoted in both urban and nonurban environments.
Policy 15:	Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.
Policy 16:	Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.
Policy 17:	There is improved information and regular monitoring of indigenous biodiversity.
Comments:	
<p><i>It is considered that the proposal provides management of indigenous biodiversity while also taking into account avoiding, remedying, and mitigating adverse effects on this resource.</i></p> <p><i>As consultation with mana whenua has only recently begun, this is an acknowledged as being on-going process that will extend beyond preparing this application through to processing, construction, operation, and eventually decommissioning of the development. It is anticipated that the mana whenua will also have the opportunity to be actively involved in the decision-making process with the District Council.</i></p> <p><i>The proposal is for a renewable energy generation development, which is intended to contribute to New Zealand’s growing demand for electricity while also decarbonising our national energy supply network. It is considered that this in of itself will promote resilience to the effects of climate change through seeking to reduce the effects of it. It is also considered that this will positively contribute towards recognising and providing for New Zealand’s social, economic, cultural, and environmental wellbeing.</i></p> <p><i>The subject site is not identified as including any areas of SNAs, including geothermal SNAs. Despite this, every endeavour to maintain indigenous biodiversity within the subject site while enabling this development is being undertaken, in accordance with the recommendations made within the Ecological Assessment (Appendix 12). This includes considering the impact of the proposal on long-tailed bats, which are a specified highly mobile fauna.</i></p> <p><i>Overall, it is considered that the proposal is largely consistent with, and is not contrary to, the intended outcomes sought through these policies.</i></p>	
Part 3: Implementation	
Subpart 1 – Approaches to implementing this National Policy Statement	
3.2 Role of decision-making principles	Comments: <i>These clauses relate to actions to be undertaken by the District and Regional Councils and are therefore not relevant to this proposal.</i>
3.3 Tangata whenua as partners	
3.4 Integrated approach	
(1)	Local authorities must manage indigenous biodiversity and the effects on it from subdivision, use and development in an integrated way, which means: (a) recognising the interconnectedness of the whole environment and the interactions between the terrestrial environment, freshwater, and the coastal marine area; and

	<ul style="list-style-type: none"> (b) providing for the coordinated management and control of subdivision, use and development, as it affects indigenous biodiversity across administrative boundaries; and (c) working towards aligning strategies and other planning tools required or provided for in legislation that are relevant to indigenous biodiversity.
<p>Comments:</p> <p><i>While this clause relates to actions for the District Council, the impact of the proposal on the role the subject site plays in managing indigenous biodiversity as part of the wider area is addressed in part under the Ecological Assessment (Appendix 12).</i></p>	
<p>3.5 Social, economic, and cultural wellbeing</p>	
(1)	<p>Local authorities must consider:</p> <ul style="list-style-type: none"> (a) that the protection, maintenance, and restoration of indigenous biodiversity contributes to the social, economic, and cultural wellbeing of people and communities; and (b) that the protection, maintenance, and restoration of indigenous biodiversity does not preclude subdivision, use and development in appropriate places and forms; and (c) the exercise of kaitiakitanga by tangata whenua in protecting, maintaining, and restoring indigenous biodiversity within their rohe; and (d) the importance of forming partnerships in protecting, maintaining, and restoring indigenous biodiversity; and (e) the role of people and communities, particularly landowners, as stewards of indigenous biodiversity; and (f) the value of supporting people and communities in understanding, connecting to, and enjoying indigenous biodiversity.
<p>Comments:</p> <p><i>The proposal is for a renewable energy generation development, which is intended to contribute towards achieving New Zealand’s climate change targets. It is considered that this in of itself will contribute towards the social, economic, and cultural wellbeing of people and communities. However, the proposal will not directly contribute towards incorporating indigenous biodiversity into providing for the social, economic, and cultural wellbeing of people and communities. Therefore, this proposal is neutral with regards to this clause.</i></p>	
<p>3.6 Resilience to climate change</p>	
(1)	<p>Local authorities must promote the resilience of indigenous biodiversity to climate change, including at least by:</p> <ul style="list-style-type: none"> (a) allowing and supporting the natural adjustment of habitats and ecosystems to the changing climate; and (b) considering the effects of climate change when making decisions on: <ul style="list-style-type: none"> (i) restoration proposals; and (ii) managing and reducing new and existing biosecurity risks; and (c) maintaining and promoting the enhancement of the connectivity between ecosystems, and between existing and potential habitats, to enable migrations so that species can continue to find viable niches as the climate changes.
(2)	<p>Local authorities must recognise the role of indigenous biodiversity in mitigating the effects of climate change.</p>
<p>Comments:</p> <p><i>The proposal is for a renewable energy generation development, which is intended to contribute to New Zealand’s growing demand for electricity while also decarbonising our national energy supply network. It is considered that this in of itself will promote resilience to the effects of climate change through seeking to reduce the effects of it.</i></p>	

However, the proposal will not directly contribute towards improving the resilience of indigenous biodiversity in response to climate change. Therefore, this proposal is neutral with regards to these clauses.

3.7 Precautionary approach	<p>Comments: This clause relates to an action to be undertaken by the District Council and is therefore not relevant to this proposal.</p>
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Subpart 2 – Significant natural areas (SNAs)	<p>Comments: The proposal does not include any identified SNAs, and this clause is therefore not relevant.</p>
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3.16 Indigenous biodiversity outside SNAs

(1)	If a new subdivision, use, or development is outside an SNA and not on specified Māori land, any significant adverse effects of the new subdivision, use, or development on indigenous biodiversity outside the SNA must be managed by applying the effects management hierarchy.
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(2)	All other adverse effects of any activities that may adversely affect indigenous biodiversity that is outside an SNA (other than indigenous biodiversity on specified Māori land (see clause 3.18)), must be managed to give effect to the objective and policies of this National Policy Statement.
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(3)	Every local authority must make or change its policy statements and plans to be consistent with the requirements of this clause.
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Comments:
It is considered that the proposal, as outlined within the Ecological Assessment (Appendix 12), provides suitable consideration of indigenous biodiversity within the site, in accordance with the effects hierarchy. Therefore, it is considered that this proposal will achieve indigenous biodiversity outcomes aligned with those sought under these clauses.

Subpart 3 – Specific requirements

3.18 Specified Māori land	<p>Comments: The proposal does not include specified Māori land, nor any acknowledged and identified taonga, and these clauses are therefore not relevant. However, it is considered that the proposal, as outlined within the Ecological Assessment (Appendix 12), provides suitable consideration for taonga related to indigenous biodiversity within the site.</p>
3.19 Acknowledged and Identified taonga	

3.20 Specified highly mobile fauna

(1)	Where information about areas used by specified highly mobile fauna is available, every regional council must record areas outside SNAs that are highly mobile fauna areas, by working together with tangata whenua (in the manner required by clause 3.3), any potentially affected landowners, territorial authorities in its region, and the Department of Conservation.
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(2)	If it will help manage adverse effects on specified highly mobile fauna, regional councils must include in their regional policy statements (where practicable) a map and description of each highly mobile fauna area in the region.
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(3)	Local authorities must include objectives, policies, or methods in their policy statements and plans for managing the adverse effects of new subdivision, use, and development on highly mobile fauna areas, in order to maintain viable populations of specified highly mobile fauna across their natural range.
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(4)	<p>Local authorities must provide information to their communities about:</p> <ul style="list-style-type: none"> (a) highly mobile fauna and their habitats; and (b) best practice techniques for managing adverse effects on any specified highly mobile fauna and their habitats in their regions and districts.
<p>Comments:</p> <p><i>The subject site is not identified in any relevant planning documents as being an area used by specified highly mobile fauna. However, as part of the Ecological Assessment (Appendix 12), it was found that the subject site contains a number of potential roosts for the long-tailed bat, which is one of the specified highly mobile fauna species.</i></p> <p><i>As a result of this, the proposal includes a number of measures to avoid and mitigate the potential impact of the proposal on this species. Predominantly, this will be through ensuring that the tree removal and trimming works do not injure or worse any long-tailed bats through the use of appropriate bat survey measures immediately prior to undertaking such works. As a result of site-wide bat monitoring, which is anticipated to be undertaken prior to works commencing, there may be implementation of additional mitigation measures associated with the loss of roost habitat.</i></p> <p><i>Therefore, while this clause relates to actions for the Regional Council, it is considered that the proposal incorporates suitable consideration for the impact of the proposal on specified highly mobile fauna as sought by this clause.</i></p>	
3.21 Restoration	Comments:
3.22 Increasing indigenous vegetation cover	<p><i>The proposal does not include restoration of or increasing indigenous vegetation cover, and these clauses are therefore not relevant.</i></p>
3.23 Regional biodiversity strategies	<p>Comments:</p> <p><i>This clause relates to an action to be undertaken by the Regional Council and is therefore not relevant to this proposal.</i></p>
3.24 Information requirements	
(1)	<p>Every local authority must make or change its policy statements and plans to require that, in relation to an application for a resource consent for an activity that would have more than minor adverse effects on indigenous biodiversity, the application is not considered unless it includes a report that:</p> <ul style="list-style-type: none"> (a) is prepared by a suitably qualified ecologist and, as required, any other person with suitable expertise, such as someone with expertise in mātauranga Māori; and (b) complies with subclause (2); and (c) is commensurate with the scale and significance (to indigenous biodiversity) of the proposal.
(2)	<p>The report must:</p> <ul style="list-style-type: none"> (a) include a description of the existing ecological features and values of the site; and (b) include a description of the adverse effects of the proposal on indigenous biodiversity and how those effects will be managed; and (c) identify any effects on identified taonga; and (d) identify the ecosystem services associated with indigenous biodiversity at the site; and (e) include an assessment of the ecological integrity and connectivity within and beyond the site; and (f) include mātauranga Māori and tikanga Māori assessment methodology, where relevant; and (g) if biodiversity offsetting is proposed, set out:

	<ul style="list-style-type: none"> (i) a detailed plan of what is proposed, including a quantified loss and gain calculation, the currency used in the calculation, and the data that informs the calculation and plan; and (ii) a description of how the relevant principles in Appendix 3 of this National Policy Statement have been addressed; and (iii) an assessment of the likely success of the plan in achieving a net gain in biodiversity values; and (h) if biodiversity compensation is proposed, set out: <ul style="list-style-type: none"> (i) a detailed plan of what is proposed; and (ii) a description of how the relevant principles in Appendix 4 of this National Policy Statement have been addressed; and (iii) an assessment of the likely success of the plan in achieving its outcomes.
<p>Comments: <i>While the proposal is not considered to result in more than minor adverse effects on indigenous biodiversity, it is supported by an Ecological Assessment (Appendix 12), which includes information pertaining to the relevant elements of the above clauses. Therefore, it is considered that the proposal is consistent with the information requirements of these clauses.</i></p>	
<p>3.25 Monitoring by regional councils Part 4: Timing</p>	<p>Comments: <i>These clauses relate to actions to be undertaken by the District and Regional Councils and are therefore not relevant to this proposal.</i></p>

5.0 NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

Clause #	Clause Text
<p>Section A: Recognising the benefits of renewable electricity generation activities</p>	
<p>Policy A</p>	<p>Decision-makers shall recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. These benefits include, but are not limited to:</p> <ul style="list-style-type: none"> a) maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; b) maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation; c) using renewable natural resources rather than finite resources; d) the reversibility of the adverse effects on the environment of some renewable electricity generation technologies; e) avoiding reliance on imported fuels for the purposes of generating electricity.
<p>Comments: <i>The proposal is to establish a renewable electricity generation activity which will increase electricity generation capacity while avoiding greenhouse gas emissions. It will also provide increased security of electricity supply at local, regional and national levels by including the provision of BESS to provide balance for the national grid between generation fluctuations due to seasonal and diurnal changes and adverse weather against the periods for peak demand.</i></p>	
<p>Section B: Acknowledging the practical implications of achieving New Zealand’s target for electricity generation from renewable resources</p>	
<p>Policy B</p>	<p>Decision-makers shall have particular regard to the following matters:</p>

	<ul style="list-style-type: none"> a) maintenance of the generation output of existing renewable electricity generation activities can require protection of the assets, operational capacity and continued availability of the renewable energy resource; and b) even minor reductions in the generation output of existing renewable electricity generation activities can cumulatively have significant adverse effects on national, regional and local renewable electricity generation output; and c) meeting or exceeding the New Zealand Government’s national target for the generation of electricity from renewable resources will require the significant development of renewable electricity generation activities.
<p>Comments: <i>The proposal will contribute to increasing the national provision of renewable electricity generation activities and towards the national target for increased generation. Further, it is considered that all adverse environmental effects associated with the proposal can be appropriately avoided, remedied, and mitigated, as is proposed, so that they are no more than minor overall. Therefore, it is considered that this proposal for a renewable electricity generation activity should be approved by the decision makers, subject to appropriate conditions. Overall, it is considered that the proposal is consistent with the intended outcomes of this policy.</i></p>	
<p>Section C: Acknowledging the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities</p>	
<p>Policy C1</p>	<p>Decision-makers shall have particular regard to the following matters:</p> <ul style="list-style-type: none"> a) the need to locate the renewable electricity generation activity where the renewable energy resource is available; b) logistical or technical practicalities associated with developing, upgrading, operating or maintaining the renewable electricity generation activity; c) the location of existing structures and infrastructure including, but not limited to, roads, navigation and telecommunication structures and facilities, the distribution network and the national grid in relation to the renewable electricity generation activity, and the need to connect renewable electricity generation activity to the national grid; d) designing measures which allow operational requirements to complement and provide for mitigation opportunities; and e) adaptive management measures.
<p>Policy C2</p>	<p>When considering any residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected.</p>
<p>Comments: <i>It is considered that this location is the most appropriate for an agrivoltaic development –</i></p> <ul style="list-style-type: none"> - <i>It has excellent solar irradiation rates,</i> - <i>It has a suitable contour for an agrivoltaic development without the need for substantial changes to the landform,</i> - <i>It is located in very close proximity to a connection point to the national grid (the Masterton substation) where there is also capacity to accommodate that electricity generation anticipated for a development of this scale,</i> - <i>It is in an area that is modified, with extensive electricity transmission network infrastructure and assets and adjacent to an established industrial area, and</i> - <i>It is within a rural environment which greatly reduces the number of sensitive receivers to such an activity.</i> <p><i>It is also considered that all adverse environmental effects associated with the proposal can be</i></p>	

appropriately avoided, remedied, and mitigated, as is proposed, so that they are no more than minor overall.

Overall, it is considered that the proposal is consistent with the intended outcomes of these policies.

Section D: Managing reverse sensitivity effects on renewable electricity generation activities

Policy D	Decision-makers shall, to the extent reasonably possible, manage activities to avoid reverse sensitivity effects on consented and on existing renewable electricity generation activities.
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Comments:

It is considered that this proposal is not likely to result in reverse sensitivity effects for existing activities or for the proposal as a result of being sited in this locality. The location of the proposed renewable electricity generation activity is located surrounding by existing electricity transmission infrastructure and assets, near an existing industrial area, and in a rural environment that has a reduced number of sensitive activities. As such, it is considered that the proposal will result in outcomes that are consistent with those sought under this policy.

Section E: Incorporating provisions for renewable electricity generation activities into regional policy statements and regional and district plans

Section F: Incorporating provisions for small and community-scale renewable electricity generation activities into regional policy statements and regional and district plans

Policy G: Enabling identification of renewable electricity generation possibilities

Policy H: Time within which implementation is required

Comments:

These clauses relate to actions to be undertaken by the District and Regional Councils regarding provision for renewable electricity generation activities, including solar / agrivoltaic developments. As it relates to the actions by councils for the adoption of provisions (rules and policies), it is therefore not relevant to this proposal as a private development to undertake such an activity.

6.0 NATIONAL POLICY STATEMENT ON ELECTRICITY TRANSMISSION

Clause #	Clause Text
Matter of national significance	
Clause 4	The matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity transmission network.
Comments:	
<i>The proposal will include a small addition to the electricity transmission network, through the connection of the development to the adjacent Masterton substation.</i>	
Objective	
Clause 5	To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while: <ul style="list-style-type: none"> managing the adverse environmental effects of the network; and managing the adverse effects of other activities on the network.
Comments:	
<i>It is considered that the proposed addition to the electricity transmission network positively contributes to and recognises the national significance of the electricity transmission network. Further, it is considered that this proposal is not likely to result in reverse sensitivity effects for existing activities or for the proposal as a result of being sited in this locality. The location of the proposed addition to the electricity transmission network is located surrounding by existing electricity</i>	

transmission infrastructure and assets, near an existing industrial area, and in a rural environment that has a reduced number of sensitive activities.

Overall, it is considered that the proposal is consistent with the intended outcomes of this objective.

Clause 6. Recognition of the national benefits of transmission

Policy 1	<p>In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:</p> <ul style="list-style-type: none"> i) maintained or improved security of supply of electricity; or ii) efficient transfer of energy through a reduction of transmission losses; or iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or iv) enhanced supply of electricity through the removal of points of congestion. The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.
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Comments:

The proposed addition to the electricity transmission network will enable a large-scale agrivoltaic development to connect into the national grid. The proposed development includes provision of a BESS, which, combined with the renewable energy generation within the development, will provide greater security of supply as the grid relies more on renewable energy sources, reducing the impact of the fluctuations in generation, and also the difference in timing for generation to demand.

This proposal will also positively help towards managing the effects of climate change, through provision of energy into the electricity transmission network from a renewable source.

Overall, it is considered that the proposal is consistent with the intended outcomes of this policy.

Clause 7. Managing the environmental effects of transmission

Policy 2	In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.
Policy 3	When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.
Policy 4	When considering the environmental effects of new transmission infrastructure or major upgrades of existing transmission infrastructure, decision-makers must have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.
Policy 5	When considering the environmental effects of transmission activities associated with transmission assets, decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.
Policy 6	Substantial upgrades of transmission infrastructure should be used as an opportunity to reduce existing adverse effects of transmission including such effects on sensitive activities where appropriate.
Policy 7	Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.
Policy 8	In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural

	character and areas of high recreation value and amenity and existing sensitive activities.
Policy 9	Provisions dealing with electric and magnetic fields associated with the electricity transmission network must be based on the International Commission on Non-ionising Radiation Protection Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4): 494-522) and recommendations from the World Health Organisation monograph Environment Health Criteria (No 238, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.
<p>Comments:</p> <p><i>It is anticipated that, through the development of detailed design for the proposed addition to the electricity transmission network, effects on the environment and adjacent properties from the proposal and associated site works can be readily managed. This is due to the proposed addition to the electricity transmission network being short in length and also due to it likely being located underground within the road reserve.</i></p> <p><i>The proposed addition to the electricity transmission network does not represent a substantial upgrade to the infrastructure.</i></p> <p><i>The subject site is not identified as being located within or adjacent to any outstanding natural landscapes, areas of high natural character, areas of high recreational value, or adjacent to existing sensitive activities.</i></p> <p><i>The proposed addition to the electricity transmission network is being designed in coordination with TransPower and will be designed to adhere to the relevant guidelines and standards for electric and magnetic fields.</i></p> <p><i>Overall, it is considered that the proposal is consistent with the intended outcomes of these policies.</i></p>	
Clause 8. Managing the adverse effects of third parties on the transmission network	
Policy 10	In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.
Policy 11	Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).
<p>Comments:</p> <p><i>The proposal is in an area that is not anticipated to generate or result in reverse sensitivity effects on the proposed addition to the electricity transmission network.</i></p> <p><i>The proposed addition to the electricity transmission network is located within an area occupied by a number of existing transmission lines associated with the Masterton substation. As a result of this siting, it is not anticipated that the proposed addition to the electricity transmission network will need any new protections than those already provided under the District Plan.</i></p> <p><i>Overall, it is considered that the proposal is consistent with the intended outcomes of these policies.</i></p>	
Clause 9. Maps	
Clause 10. Long-term strategic planning for transmission assets	
<p>Comments:</p> <p><i>These clauses relate to actions to be undertaken by the Regional Council and are therefore not relevant to this proposal.</i></p>	

7.0 OTHER NATIONAL POLICY STATEMENTS

National Policy Statement Name	Comments
National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat	<i>The proposal does not include any greenhouse gas emissions from industrial process heat, as this proposal is not an industrial process.</i>
National Policy Statement on Urban Development (NPS-UD)	<i>The proposal is not for an urban development and is not located within an area identified for current or future urban development potential.</i>
New Zealand Coastal Policy Statement (CPS)	<i>The subject site is not located within or adjacent to the coastal environment.</i>