Rewiring Aotearoa submission on Proposed National Direction, Package 1: Infrastructure and development

Our feedback relates to:

- Section 2, Part 2.2: National Policy Statement for Renewable Electricity Generation (NES-REG), and
- Part 2.4: National Environmental Standards for Electricity Transmission Activities (NES-ENA)

About Rewiring Aotearoa

Rewiring Aotearoa is an independent non-partisan non-profit funded by New Zealand philanthropy. It is a registered charity working on energy, climate, and electrification research, advocacy, and supporting communities through the energy transition. The team consists of New Zealand energy, policy, and community outreach experts who have demonstrated experience both locally and internationally. We're always fighting for the New Zealanders who use the energy system, and our goal is to help build a low cost, low emissions, high resilience electrified economy for Aotearoa NZ.

What is needed

We appreciate that broader resource management reform is underway that will ultimately provide a more consistent national framework. However, we cannot afford to wait for the perfect system while workable solutions are delayed. In the meantime, inconsistent and unnecessary consenting requirements for small-scale ground-mounted solar are slowing down projects that could deliver immediate benefits - lowering energy costs, strengthening resilience, and supporting the grid.

While long-term reform is important, immediate adjustments will ensure small-scale solar isn't held back by outdated or inconsistent rules.

Ground-mounted solar up to 1 megawatt should be a permitted activity [NES-REG]

Small to medium scale ground-mounted solar (under 1 megawatt, around 1.5 hectares) has very minor environmental impacts and should be a permitted activity under the NES-REG.

Currently there are inconsistencies across councils as to whether consents are needed, consent requirements and some requirements are not reasonable.

Rationale

When paired with battery storage, this scale of solar delivers significant benefits - strengthening local energy security, improving resilience during outages, lowering energy costs, and creating new income opportunities for rural communities. For the arable and drystock farmers who are struggling, selling this power back to the grid - especially at peak times - could be enough to keep them in business.

It would also support NZ's energy system, including both energy security in dry years (when it's not raining there is measurably more solar output), and peak loading if they combine it with battery storage.

We recommend that solar, when in a rural zone, has permitted activity status if it's less than 1 megawatt and is not treated as a new business activity. This would cover around 1.5ha of land. Rewiring Aotearoa's team had previously thought around 300kW would be sufficient, but having canvassed that with farmers and their advisors, we think 1 megawatt would be a more suitable investment for the needs of farmers. This would meet their current and future energy needs while enabling them to export surplus power.

On-farm energy needs for dairy vary significantly depending on the size and setup of the farm - including irrigation, pumping water from bores, and running the milking shed. In the future, electricity demand is expected to rise as farmers begin electrifying fossil-fuelled machinery like tractors, quad bikes, and frost protection equipment.

The following examples are anecdotal evidence we have been provided about some of the consenting rules we believe are overly restrictive. We are providing these for information purposes, to demonstrate this really is an issue, not as a criticism of the councils themselves. We have had the following case studies provided to us by people in the industry, trying to work with councils to get projects across the line:

1. We understand that Environment Canterbury is requiring ground-mounted solar installations to apply for a consent to discharge water, to account for the water that hits the panels and runs off them. The concern is that water will mix with contaminants that have landed on the panels (such as bird pool, dust, and pollen), and this will then be 'discharged' onto the ground below.

2. In one example, Central Hawke's Bay District Council now requires resource consent for any solar installation over 20kW, including rooftop systems. We've been made aware of a case involving a large commercial business that secured consents for a construction project - including a rooftop solar array - prior to the 20kW threshold being introduced in 2024. Despite this, the council has issued an abatement notice, halting the solar installation mid-project.

3. And finally, a planner advised us that Hurunui District Council requires consent for solar installations of over 25m^2. This is less than what's needed to power your average NZ home.

These examples demonstrate that while solar has been around for over a decade, councils are still unsure how it fits in within their policy frameworks. They want to apply the right set of rules to protect the environment, and themselves from potential legal risk down the track. It seems that this uncertainty is resulting in an overly precautious approach.

We encourage the Government to provide national direction that provides 1 MW ground mounted solar permitted activity status and sets out the specific conditions and rules that are required for this including appropriate size and conditions surrounding the installation and operation of solar panels.[1]

Clarity over when a consent is required and active promotion for small scale rooftop solar

Roof top solar should also be a permitted activity. As the discussion document notes "The costs and processes associated with resource consent acquisition can discourage investment in smaller-scale projects that tend to have fewer significant adverse effects." We think this is definitely the case for roof top solar, which are simply added to existing rooftops with minimal effects.

National direction could include clarity conditions surrounding the installation and operation of small scale rooftop solar panels.[2]

National direction should require councils to actively promote rooftop solar because of the minimal effects it has and because of the significant climate and local energy resilience benefits it can provide.

Clarify and streamline rules for Outstanding Natural Landscapes [NES-REG]

Solar on existing rooftops in outstanding natural landscapes (ONLs) should be permitted activities where possible, with national consistency on any conditions.

Rationale

We support the protection of Outstanding Natural Landscapes (ONLs), but current rules are often overly broad and inconsistently applied. In many areas, large swathes of land are designated ONL, making it difficult to consent even low-impact developments like small-scale rooftop solar on farms or community facilities.

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[1] In circumstances where consents are required for ground mounted solar, 20 year consents are needed to support access to loans.

[2] Rooftop solar in heritage regions should be considered as potential circumstances where permitted activity status may not apply.

National direction is needed to strike a better balance between environmental protection and the benefits of distributed energy generation, including energy resilience.

These restrictions are frequently applied in remote, rural areas where communities are especially vulnerable to power outages. During extreme weather events, some can remain disconnected from power for days due to their distance from repair crews. Enabling small-scale solar in these areas would strengthen local resilience and help keep homes and essential services powered when the grid goes down.

Support rural EV charging by making it a permitted activity [NES-ENA]

Rewiring Aotearoa supports the proposal to make ancillary EV charging a permitted activity in the NES-ENA, subject to appropriate limits on height, noise, and earthworks. We recommend clarifying that this permitted activity status applies to farms, marae, small and medium enterprises, schools, and other rural organisations - provided chargers are safely located off-road and meet traffic safety standards.

Rationale
Many farms already have the network capacity to host public fast chargers. In fact, any farmer with a network-connected irrigation pivot would have sufficient capacity to do this. Making it clear that they can do so as a permitted activity would allow these organisations to contribute to rural charging corridors and help grow New Zealand's public EV charging network.

Enabling commercial EV fast charging on farms, marae, schools, and other rural enterprises, will support the Government's target of deploying 10,000 public EV chargers by 2030, while helping to ensure rural communities aren't left behind in the transition to electric transport.

Responses to specific questions

11. Do you support the proposed amendments to the objective of the NPS-REG?

Yes, with changes.

Why?

The proposed aims included in the NPS-REG should reflect the enhanced resilience benefits that local generation and battery storage can provide, especially as the climate continues to change and our country faces increasing adverse weather events.

Rewiring Aotearoa's suggested addition is underlined in the text below.

The proposed amendments to the objective respond to New Zealand's targets for reducing emissions becoming law. The proposed amended objective highlights the critical role and benefits REG provides, stating the aims that REG generated in New Zealand:

1. *increases in a rate and manner necessary to support the achievement of New Zealand's emissions reduction and energy targets and associated plans under the Climate Change Response Act 2002*
2. *provides greater resilience to disruptions to electricity supply, particularly where renewable energy is generated and stored locally in communities that are vulnerable to power outages*
3. *provides for the social, economic and cultural wellbeing of people and communities, and for their health and safety, while managing the adverse effects of REG activities.*

12. Are the additional benefits of renewable electricity generation helpful considerations for decisionmakers? Why or why not?

Yes.

These benefits help to clarify the co-benefits of renewable electricity generation, especially where electricity is generated and stored locally. We suggest the following additions (underlined below).

Proposed policy A:

a) *Decision-makers must recognise and provide for the national significance and benefits of REG activities at a national, regional and local scale. The benefits of REG activities, include, but are not limited to:*
   i. *avoiding and reducing greenhouse gas emissions to provide positive effects for people, communities and the environment;*
   ii. *contributing to the security, resilience and independence of electricity supply at national, regional and local levels through diverse REG sources and locations;*
   iii. *providing for the social, economic and cultural well-being of people and communities and for their health and safety;*
   iv. *increasing resilience and long-term stability by using renewable rather than finite sources of energy;*
   v. *avoiding reliance on imported fossil fuels for the purposes of generating electricity; and*

vi. *the temporary and reversible adverse effects of some REG technologies on the environment.*

vii. *local generation and storage can reduce load on the national grid at peak times, reducing energy costs reducing energy costs, and contribute to energy security during dry years*

b) *The additional benefits of REG activities that are:*

i. *located close to electricity demand and electricity networks, such as reduced electricity losses, economic efficiencies and environmental benefits;*

ii. *co-located with other appropriate REG activities and assets and other appropriate infrastructure and activities; and*

iii. *located where adverse effects on other activities are minimised.*

iv. *local generation and storage as part of an agricultural or other rural enterprise reduces energy costs and provides income diversity, boosting rural economic resilience and productivity.*