

**Form 3**  
**Submission on proposal for national policy statement for  
renewable electricity generation**

*In accordance with section 49 of the Resource Management Act 1991*

**To** the Chairperson  
Board of Inquiry

This is a submission on the (following) proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

The specific provisions of the proposal that my submission relates to are:

All provisions

My submission is:

The National Policy Statement has some major deficiencies and is not the most appropriate method of achievement.

The Preamble states that the NPS “sets out an objective and policies to enable the sustainable management of renewable electricity generation”. In its current form, the NPS is less about sustainable management, and more about the establishment of a framework that can deliver a more lenient approach to the assessment of environmental effects for renewable energy projects, compared to other activities. Whether this can be called sustainable management is questionable. That such a conclusion can be drawn following a review of the NPS is disappointing, given the open acknowledgement in the Preamble that increasing renewable electricity generation can have negative environmental effects that manifest locally, with positive effects that manifest nationally. The policies do little to address this imbalance.

The targets of the NZ Energy Strategy are laudable. However, council has a fundamental concern with the means being used for delivery; in particular, the elevation of a Section 7 RMA matter to the same status

as a Section 6 matter via this NPS process. It would appear more logical that, as a first step, the RMA be amended to reflect the national importance of the issue, with possibly an NPS to follow.

Council's comments about the Preamble and Objective of the NPS means that it is also opposed to policies 1 through 3. If renewable energy is to be treated as a matter of national significance/importance, then it would make sense that it appear in the RMA as a Section 6 matter, not Section 7.

Council supports the intent of Policies 4 and 5 and will consider such matters during the current district plan review.

I seek the following changes to the proposal:

That the National Policy Statement be amended to reflect comments made by Rotorua District Council.

**I do not** wish to be heard in support of my submission.



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Signature of submitter (*or* person authorised to sign on behalf of submitter)

Date: 31 October 2008

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