

31 October 2008

01-33-09
08899498

Board of Inquiry - Ministry For The Environment (Wellington)
PO Box 10362
The Terrace
Wellington 6143

Dear Ms Keys

SUBMISSION ON NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

Introduction

We support the concept of the desirability of promoting renewable energy generation, but not at the expense of the overarching Resource Management Act (RMA) objectives. We need to integrate the consideration of benefits and effects rather than elevate renewable energy generation above the consideration of environmental effects. Just because it is renewable does not *automatically* make it good for the environment.

We make the following comments on the proposed Policies:

Policy 1

This policy does not provide any real guidance on how to reconcile competing matters of national importance at a local level. To ensure consistency, some clarification or guidance is required.

Policy 2

We accept the premise that some adverse effects may occur that are assessed as being acceptable, however environmental effects must still be considered subject to Part II of the RMA. We would like to see some reference to Part II and the need to manage adverse effects be inserted.

Policy 3

The concept of reversibility is too vague. Opportunities for renewable energy generation methods of the future may be limited unnecessarily, in addition to hydro generation being possibly disadvantaged in comparison to other methods when it may not be appropriate. We seek to have this policy deleted or substantially clarified as to its intent.

Policy 4

This policy seeks to have largely undefined identification, assessment and investigation activities enabled through plan rules without any reference to actual effects. If you have a good effects based plan, then monitoring and testing activities should be treated no differently than any other land use activity. If effects are minor and/or temporary, then they should be covered under existing plan provisions. To broadly enable a category of undefined activities without reference to effects is not in keeping with our planning approach. We would seek to have better definition of the scale and extent of the effects of the activities being enabled to be indicated as part of this policy.

Policy 5

We accept that there is a risk of small scale generation projects incurring costs not reflecting their scale of effects. However enabling activities associated with community scale (4 MW) projects must still be subject to consideration of Part II of the RMA. There are potentially cumulative effects that need to be considered if a number of such proposals are all located in reasonable close proximity. There are also some effects (such as on landscape, biodiversity etc) that need to be considered seriously on a case by case basis. We would like to see this policy amended to be more specific as to the scale of effects envisaged in projects to be 'enabled'.

Planning for the infrastructure needs of small communities is wider than just RMA considerations, and any NPS should not undermine the ability of local authorities to plan strategically for such needs.

Summary

The issues around promoting renewable energy generation (and infrastructure) are bigger than the RMA, and need to be balanced against soft infrastructure priorities in an integrated and planned manner. We are not convinced that this proposed NPS contributes sufficiently to achieving this.

We reserve the right to be heard in respect of this submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Yours sincerely

Garry Dyet
DEPUTY CHIEF EXECUTIVE