

Please find attached my submission on the draft NPS.

In principle I **support** the development of an NPS on renewable electricity generation.

However, I **oppose** certain aspects of the draft NPS.

The issues I wish to comment on are:

- Scope of the types of renewable energy covered by the NPS
- Hierarchy and sequential approach to site selection
- Proximity principle
- Deficiencies in the Section 32 evaluation
- Commercial advantage
- Weighting of renewable energy schemes
- District Plan provisions

The reasons for my submission are as follows:

Scope of Renewable Generation Types

It would be helpful for the NPS to identify the range of generation types that are being considered (wind, hydro, wave, geo-thermal, solar) and provide some information on their operational needs/characteristics. This would improve certainty and clarity for the scope of the NPS.

Hierarchy & Sequential Approach to Site Selection

The NPS should provide direction on technically suitable locations for each type of renewable energy, or guidance on how to identify such locations. For instance whilst wind turbines could in theory be located anywhere, there will be fewer locations where the wind speed and consistency is sufficient to support commercially viable operations. There is likely to be a hierarchy for each type of generation, with locations ranging from optimum through to non viable. It is important to know this information, or how to go about determining it, in order that the relative merits of renewable energy can be judged against other issues, some of which will also be Part 6 RMA matters. A sequential approach to site selection (from best to worst) could then be developed. This would help to ensure that the benefits of renewable schemes are optimised. It would also enable less suitable generation sites to be protected, at least for a time, from inappropriate development. Consideration should also be given to the potential advantages of upgrading existing facilities prior to new sites being considered for development. This would assist in minimising the footprint, distribution and cumulative of effects from generation activities, whilst enabling more efficient outputs.

Proximity Principle

There may be merit in considering the proximity principle, ie generation being located close to the end user. This will help to determine the most appropriate choice for generation in relation to a range of factors. By putting generation close to the end user, it will also help to reduce other costs and effects, such as power loss during transmission and the impact of transmission lines (which are often not considered as part of the generation proposal).

Deficiencies in Section 32 Evaluation

The Section 32 evaluation focuses on the potential economic and environmental benefits of renewable energy. It is considered to be weak in its assessment of the broader range of environmental cost associated with renewable energy generation eg landscape, ecology and earth sciences. It also provides little comment on the potential social/cultural impacts on local communities. Failure to fully address these issues appears to have constrained the assessment of options and implications.

The evaluation seems to favour reducing the impact on central government whilst deferring responsibility and increasing cost and complexity for local government. There are a range of benefits associated with utilising a single central policy guidance document including a simplified process for generators operating across a range of territorial areas, improved clarity and certainty, and an overall reduction in the cost of policy development and roll out. This approach has been successfully operated elsewhere – UK Planning Policy Guidance & Statements (PPS 22).

Commercial Advantage

Although renewable energy has some advantages over conventional generation, the aim should not be to encourage an oversupply. The prudent use of all types of energy should be a priority in achieving sustainable management of resources. It is important to remember that in addition to the sustainability policy drivers for renewable energy generation, it is a commercially driven activity. Power companies could exploit the perceived benefits for commercial advantage at the expense of other environment qualities or impacts on local communities.

Weighting of Renewable Schemes

Whilst the draft NPS considers all renewable energy is of national importance, it does not give an indication of how the relative merits of one form could be judged against another, ie if there is a choice should option a) (say wind) be preferred over option b) (say hydro). A more holistic approach would help to ensure that the benefits of renewable energy schemes are maximised.

Although renewable generation, per se, may be of national importance, it should be recognised that all schemes are not of equal merit or value. In particular, there is a clear distinction between the scale and benefit of a domestic scheme, versus a commercial

operation. It would appear inappropriate to give small scale facilities the same weight, particularly when there are other local issues to consider under the RMA.

District Plan Provisions

It is not clear what the justification is for requiring all authorities to prepare provisions for exploration and research into potential renewable energy sites (Policy 4). As referred to above, not all locations are likely to be suitable. There is a strong case for the establishment of a centralised data resource to improve the quality and accessibility of information on renewable energy sources. This would help to improve the efficiency of the planning system and provide operators and the community with more certainty as to how the NPS would operate.

The relief sought in relation to my submission is as follows:

That the draft NPS be amended to -

- Provide further detail in respect of the range of renewable energy generation covered by the NPS
- Include a hierarchy and sequential approach to site selection
- Include a proximity principle
- Ensure that environmental cost associated with renewable energy generation eg landscape, ecology and earth sciences, and social/cultural impacts on local communities are fully taken into account
- Promote the prudent use of energy and sustainable use of resources
- Ensure that the NPS does not distort commercial competition and promote unnecessary generation
- Provide measures to enable different types of renewable energy schemes to be weighted
- Not require all District Plan to include provisions for renewable energy exploration
- Make provision for a centralised (national) data base on renewable energy resources and technology

I do not wish to present my submission in person at the Board of Inquiry.

Regards,

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