



Ref n71474

15 October 2008

Chairperson

Board of Inquiry – Proposed National Policy Statement on Renewable Electricity Generation

P O Box 10 362

**WELLINGTON 6143**

## **GISBORNE DISTRICT COUNCIL SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT ON RENEWABLE ELECTRICITY GENERATION**

### **Introduction**

The Gisborne District Council (“GDC”) thanks the Board of Inquiry on the Proposed National Policy Statement on Renewable Electricity Generation (“NPSREG”) for the opportunity to comment on the proposal.

GDC makes this submission in recognition of its:

- statutory responsibilities under the Resource Management Act (RMA) 1991
- role in local governance as a unitary authority and advocate for the residents and ratepayers within the Gisborne District.

GDC notes the submission of Local Government New Zealand.

GDC does not support the proposed NPSREG unless it offers useful guidance to decision-makers. We wish to take this opportunity to highlight three key matters:

- pressure on resources
- guidance on balancing priorities
- environmental bottom lines.

### **Pressure on Resources**

Council cannot stress enough that our existing resources are currently under intense strain.

There are several national policy statements currently at various stages of development. Councils are required to give effect to these, which can be a significant resource requirement particularly for smaller Councils. This is exacerbated by the shortage of qualified and experienced planning staff (<http://www.mfe.govt.nz/rma/practitioners/shortage/mfe-update-shortage.html>).

To illustrate the resource pressures, the proposed New Zealand Coastal Policy Statement 2008 will require an estimated 18 changes to GDC’s regional and district plans within 5 years, some of them very contentious. Currently, GDC has the full-time equivalent of 2.6 staff responsible for the Regional Policy Statement and our regional plans for the coastal environment, land, air and discharges.

Repeated pleas during successive consultation processes on these national policy statements appear to have not been heeded by central government. We implore the Board to consider the implementation burden that

will fall on local authorities and request that central government release funds and resources to support the implementation of the NPSREG.

### **Guidance on Balancing Priorities**

Council questions the usefulness of the proposed NPSREG. There is a lack of clarity in how to use the NPSREG to guide decision-making. It has the potential to be meaningless as it adds little beyond section 7 (j) of the RMA and does little to promote a “nationally consistent framework”.

Specific guidance is required on:

- specific sites and locations of national importance for recreational, cultural, environmental reasons that would not be appropriate for the development of renewable electricity generation i.e. Exclusion Zones. It is central government’s role to identify these areas of national significance
- balancing matters of national importance in section 7 of the RMA and balancing matters of national significance identified in the burgeoning number of national policy statements.

GDC concedes that the NPSREG may not be the most appropriate place to provide this guidance, however we request that the Board recommend to the Minister that the NPSREG only be adopted if the guidance specified above is forthcoming to ensure effective implementation of this and other national policy statements.

### **Environmental Bottom Lines**

Some minimum environmental standards, regardless of generation technology, need to be maintained to meet the purpose of the RMA.

We request the following amendment to Policy 3.

*When considering proposals to develop new renewable electricity generation activities, decision-makers must have particular regard to the relative degree of reversibility of the adverse environmental effects associated with proposed generation technologies.*

There must be an environmental bottom line regardless of the generation technology. Comparing the relative effects of technologies and selecting the most permanently benign will not necessarily result in good environmental outcomes.

### **Conclusion**

GDC understands the intention of the proposed NPSREG, however, does not support the NPSREG unless it has the potential to offer real guidance to decision-makers without imposing significant costs on local authorities. We ask that the Board of Inquiry recommendations to the Minister for the Environment reflect the comments raised in this submission, particularly regarding resourcing and guidance.

Yours faithfully



Trevor Freeman

**Acting Environment and Planning Manager**