



New Zealand
Historic Places Trust *Pouhere Taonga*

NEW ZEALAND HISTORIC PLACES TRUST POUHERE TAONGA

**SUBMISSION ON
'PROPOSED NATIONAL POLICY STATEMENT FOR
RENEWABLE ELECTRICITY GENERATION'**



31 October 2008

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The Board of Inquiry
PO Box 10362
Wellington 6143

**RE; NEW ZEALAND HISTORIC PLACES TRUST POUHERE TAONGA
SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT FOR
RENEWABLE ELECTRICITY GENERATION**

This is a submission on the Proposed National Policy Statement for Renewable Electricity Generation (the NPS).¹

The New Zealand Historic Places Trust Pouhere Taonga (the NZHPT) **supports** the preparation of national guidance on renewable electricity generation that provides adequate provision for historic heritage as a matter of national importance.

The NZHPT has considered the evaluation report under section 32 of the RMA (the section 32 report).

Requested amendments, in this submission, to the NPS are highlighted in bold.

The New Zealand Historic Places Trust

The NZHPT is an autonomous Crown entity in terms of the Crown Entities Act 2004, governed by its Board established under the Historic Places Act 1993. The NZHPT is New Zealand's leading national historic heritage agency. The NZHPT is a public membership organisation with, at the time of writing, some 26,000 subscribing members and 24 branch committees throughout New Zealand established and provided for in a manner consistent with the Historic Places Act 1993. The NZHPT was established in 1954.

The NZHPT also includes a Maori Heritage Council. The functions of the Maori Heritage Council, set out in section 85 of the Historic Places Act 1993, include: the protection of Maori heritage; that NZHPT meets the needs of Maori in a culturally appropriate manner; to develop programmes for the identification and conservation of Maori heritage; and to assist the NZHPT to develop and reflect a bicultural view in the exercise of its powers and functions.

The NZHPT role in the identification, protection, preservation, and conservation of historical and cultural heritage is extensive and nationwide. This role includes:

- Leadership on heritage issues important to New Zealand.

¹ Front cover: Belgrove Railway Windmill near Nelson, Registered Category I historic place, Photo, R O'Brien, 2003

- Assisting Maori communities to identify and protect and preserve wahi tapu and in the restoration of historic marae-related buildings and structures.
- The management, administration, and control of heritage properties. The NZHPT manages, administers, and owns some 48 nationally significant heritage properties. Many of these properties are open to the public as tourist and historical attractions.
- The provision and distribution of advice and information for the protection and conservation of heritage places.
- The registration of historic places, historic areas, wahi tapu, and wahi tapu areas.
- The issuing of archaeological authorities under section 14 of the Historic Places Act with regard to activities that may destroy, damage, or modify archaeological sites.
- Statutory advocacy for the protection of historic and cultural heritage under the Resource Management Act 1991 (RMA), the Building Act 2004, and related resource management legislation. This role includes the issuing of heritage orders and the negotiation and execution of heritage covenants.

Historic renewable electricity generation

Renewable electricity generation forms part of the historic heritage of New Zealand. It has played a vital role in the progress and development of the country from the late 19th Century.

A range of water-generation related places are registered as historic places under the Historic Places Act 1993. These places include the Mokopeka Station Power House (Hawke's Bay), Mangorei Power Station, Mangahao Hydro Electric Power Station (Horowhenua), the Arapuni Dam, Pupu Hydro Scheme (Tasman) and the Omanawa Falls Power Station (Tauranga). The NZHPT has also registered the Belgrove Railway Windmill near Nelson which dates from 1898.

In addition to the NZHPT, groups such as the Institution of Professional Engineers New Zealand (IPENZ) are seeking greater recognition of the heritage values of electricity generation-related places. For example, the IPENZ Heritage Register includes Ohaaki Power Station, Upper Waitaki Power Development Project, and Wairakei Geothermal Power Station.²

The growing recognition of generation heritage highlights the need for detailed heritage assessments to accompany upgrade and new works to ensure infrastructure of heritage value is identified and preserved for future generations. It also highlights the need for further research at a national and regional level to identify renewable electricity generation of heritage value.

The construction of renewable electricity generation projects in the past has resulted in major threats and loss of historic heritage and for the wider environment. For example, the construction of the Clyde Dam in the Kawarau River Valley had a massive adverse effect on the historic gold mining landscape of Central Otago during

² IPENZ Heritage Register, www.ipenz.org.nz/heritage

the 1980s.³ In a similar manner, the construction of the Upper Waitaki Hydro Scheme in the post World War II period resulted in large scale changes to the heritage landscape of the Mackenzie Basin.⁴

Renewable electricity generation projects continue to threaten historic heritage values. Hydro generation can destroy heritage values associated with rivers and lakes and areas of land subject to inundation. Earthworks associated with geothermal generation can damage historic places and sites and the geothermal water take can cause land subsidence. Wind generation results in substantial visual effects relating to the landscape and careful planning is required to avoid adverse effects on historic heritage. Wave or ocean current generation is new to New Zealand and needs to be designed to avoid effects on the coastal environment, including historic shipwrecks and places and areas of significance to Maori. Solar-related facilities, such as solar heating units, can also impact upon the visual appearance of historic buildings.

National guidance for environmental rules and standards

The NPS has been developed because of perceived barriers to renewable electricity generation under existing RMA policy statements and plans provisions and resource consent procedures. (section 32 report, page 12). The current set of RMA policy statements and plans are reflective of Part II of the RMA and contain a range of objectives and policies relating to matters such as water, air, soil, historic heritage, landscape, coast, and the Treaty of Waitangi. The quality of rules in RMA policy statements and policies, however, is very variable with a ‘patch-work’ of approaches which results in uncertainty for development, including renewable electricity generation infrastructure. As an example, few district plans contain schedules and effective rules relating to Maori heritage, historic sites, historic areas and heritage landscapes. This results in a weak regulatory environment for the broad range of landscape-related issues and consequently a NPS for renewable electricity generation may result unforeseen and cumulative environmental effects.

The NZHPT considers that, in the first instance, national guidance should be prepared for the range of environmental landscape matters, particularly those matters outlined in section 6 of the RMA. This approach is being achieved for the coastal environment via the New Zealand Coastal Policy Statement and is being addressed in the proposed NPS for freshwater water management. This approach needs to continue for other section 6 matters including outstanding natural features and landscapes, significant indigenous vegetation and significant habitats of indigenous fauna, Maori heritage, historic heritage, and recognised customary activities. This approach was recommended, in terms of landscape assessment, by the Parliamentary Commissioner for the Environment in *Wind power, people and place*.⁵ With regard to historic heritage, national guidance should be based on the NZHPT’s non-statutory guidance *Sustainable Management of Historic Heritage Guidance Series*, August 2007.⁶ The Parliamentary Commissioner for the Environment also recommended that regional councils take a leadership role in developing a proactive and strategic approach to wind power development.⁷

³ Ritchie, N, Kawarau River Valley Archaeological Survey. An Inventory and Assessment of Prehistoric and Historic Sites in the Kawarau River Valley, Central Otago, with comments on the possible impacts of hydro construction. Report for the New Zealand Historic Places Trust, 1983

⁴ John Wilson, ‘At the Outlets’, *New Zealand Historic Places*, No.47, 1994, pp 32-34

⁵ Parliamentary Commissioner for the Environment, *Wind power, people and place*, 2006, p 118

⁶ NZHPT, *Sustainable Management of Historic Heritage Guidance Series*, August 2007. See:

http://www.historic.org.nz/publications/SustMgt_guidance_series.html

⁷ Parliamentary Commissioner for the Environment, *Wind power, people and place*, 2006, p 116

National guidance in the form of NPS and NES for the landscape environment, with regional guidance, will result in improved policy statement and plan provisions in terms of having nationally consistent rules and processes. These rules will increase certainty for the development of renewable electricity generation and other types of infrastructural development.

As a priority, the national guidance should be prepared for section 6 landscape-related matters, including outstanding natural features and landscapes, significant indigenous vegetation and indigenous fauna habitats, Maori heritage, historic heritage, and recognised customary activities.

Historic heritage as an issue of national significance

In determining whether it is desirable to prepare a NPS, the Minister may have regard to a number of matters outlined in section 45(2) of the RMA. The section 45(2) matters includes (c) anything which affects or potentially affects any structure, feature, place, or area of national significance. The NZHPT considers the proposed NPS should consider the issue of historic heritage as a matter of national significance.

As defined in the RMA, historic heritage means:

(a) those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:

- (i) archaeological:
- (ii) architectural:
- (iii) cultural:
- (iv) historic:
- (v) scientific:
- (vi) technological; and

(b) includes

- (i) historic sites, structures, places, and areas; and
- (ii) archaeological sites; and
- (iii) sites of significance to Maori, including wahi tapu; and
- (iv) surroundings associated with natural and physical resources.

The protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance under section 6(f) of the RMA. Historic heritage is also a finite resource and contributes towards the maintenance and enhancement of the quality of the environment under section 7 of the RMA. As a finite resource, the effects on historic heritage are often irreversible.

As a priority, the NPS for renewable electricity generation should assist in achieving section 6(f) of the RMA.

The Treaty of Waitangi as a matter of national significance

The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga is a matter of national importance under section 6(e) of the RMA. Also section 8, provides for the taking into account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

As a relevant matter, section 45(2)(h) states ‘anything which is significant in terms of section 8 (Treaty of Waitangi)’.

As a priority, the NPS for renewable electricity generation should assist in achieving both section 6(e) and 8 of the RMA. This will involve a range of strategies including:

- Giving recognition and prominence to the principles of the Treaty of Waitangi.
- The identification, recognition and conservation of archaeological sites, waahi tapu, waterways, lakes, maunga and other places and areas of significance to Maori.
- The identification, recognition and conservation of important natural landscape surroundings associated with marae, including visual corridors from marae to maunga (mountains), awa (rivers), and other taonga.
- Ensuring active consultation and collaboration with Maori in the planning and design of renewable electricity generation projects.
- The adoption of Maori values in the planning and design of renewable electricity generation projects.

The NZHPT submits that the NPS should give greater recognition to the principles of the Treaty of Waitangi.

Preamble

The preamble recognises that renewable electricity generation has environmental effects that ‘span local, regional and national scales, often with adverse effects manifesting locally and positive effects manifesting nationally.’ Further, the preamble states that ‘the benefits of renewable generation can compete with matters of national importance as set out in section 6 of the Act and with matters to which decision-makers are required to have particular regard under section 7 of the Act.’

The NZHPT welcomes the recognition of the environmental effects of renewable electricity generation. It is, however, difficult to simply ‘pigeon-hole’ effects as ‘adverse = local’ and ‘positive = national’. Historic heritage is a matter of national importance along with the other section 6 matters of the RMA. The loss, therefore, of historic heritage is a matter of national importance, not just locally important. The degree of loss or positive benefit is dependent on complexity of the individual case. For example, the Environment Court in (*Papamoa Junction Ltd v NZ Historic Places Trust*, A056/2005), highlighted the importance of Te Houhou in the Bay of Plenty Region as a nationally significant archaeological landscape. The Environment Court upheld the NZHPT's decision to refuse an application to destroy part of an archaeological midden site. Judge Bollard stated in the decision that ‘we accept that the area of Te Houhou including the site represents what may be described as a rich landscape of special significance, both in terms of spiritual and cultural values and

archaeologically (para 20)'. The loss, therefore, of Te Houhou would have adverse effects at a national scale.

In addition to adverse effects at a national scale, positive effects of renewable electricity generation can also be positive at a local scale (as recognised in Policy 1). This is particularly in relation to small and community scale renewable electricity generation and other side-effects such as enhanced habitat for trout and salmon and improved recreational facilities on a hydro lake.

It is not so much a matter of 'competition' between the benefits of renewable electricity generation with section 6 or section 7 matters, but the different and complex values that need to be provided for. In fact, it is often the case that individuals and groups who work to protect historic heritage values also highly value the need for renewable electricity generation.

In the first instance, renewable electricity generation projects must meet the purpose of the RMA, including sustaining the potential of natural and physical resources, safeguarding the life-supporting capacity of air, water, soil and ecosystems and avoiding and remedying or mitigating any adverse effects on the environment. To achieve this purpose, matters of national importance need to be recognised and provided for and having regard to the section 7 matters. If a renewable electricity generation project does not meet the purpose of the Act in terms of achieving the 'environmental bottom line', it will unlikely be consented to.

The preamble also fails to mention relevant section 6 and 8 RMA matters concerning Maori including:

- Section 6(e) The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
- Section 6(g) The protection of recognised customary activities.
- Section 7(a) Kaitiakitanga.
- Section 8 Treaty of Waitangi.

Along with other matters such as historic heritage and natural character, it is critical that the relevance of Maori heritage should be recognised in the preamble of the NPS.

Requested change: Preamble

To provide greater recognition of the potential range of effects of renewable electricity generation and of Maori heritage values, including the Treaty of Waitangi, the NZHPT seeks the amendment of the preamble (at paragraph 4) to state:

Development that increases renewable electricity generation capacity can, however, have environmental effects **and benefits** that span local, regional and national scales. In some instances renewable electricity generation can **entail** matters of national importance as set out in section 6 of the Act, and with matters to which decision-makers are required to have particular regard under section 7 of the Act. In particular, the natural resources from which electricity is generated can **be** areas of significant natural character, significant amenity values, historic heritage, **places and areas of importance to Maori and for recognised customary activities**, outstanding natural features and landscapes,

significant indigenous vegetation and significant habitats of indigenous fauna. **In addition, renewable electricity generation activities need to take into account issues relating to the principles of the Treaty of Waitangi (Te Tiriti of Waitangi) as required by section 8 of the RMA.**

Adopting a nationally consistent approach to balancing the **complex** values associated with the development of New Zealand's renewable energy resources will provide greater certainty to decision-makers, applicants, and the wider community.

Objective

The objective of the NPS aims to recognise the national significance of renewable electricity generation. This objective has a number of potential costs as discussed in the section 32 report (pages 31-32), including the greater use and development of natural and physical resources, 'which may result in adverse environmental effects.'

The NZHPT is concerned that the objective may result in adverse environmental effects as a result of greater use of natural and physical resources. It is also the Government's intention that adverse environmental effects should not result. As stated in the section 32 report (page 33):

Although the Government clearly articulates its support for renewable electricity generation projects through this Objective, there is no intention to support these projects at the cost of the environment.

The Government's intention to preserve the environment and to support renewable electricity generation, however, is not explicitly stated in the objective. The NZHPT is concerned that the objective as stated in the proposed NPS does not explicitly recognise the potential effects on the environment or other wider considerations. For this reason, the NZHPT considers that the above statement in the section 32 report should be integrated into the objective.

Requested change: Objective

To provide recognition of the environment in relation to recognising the national significance of renewable electricity generation, the NZHPT seeks the amendment of the objective to state:

To recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities **while safeguarding natural and physical resources. It is intended that 90 per cent of New Zealand's electricity will be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year).**

Policy 1. Recognising the national significance of the benefits of renewable electricity generation activities

The NZHPT recognises the benefits of renewable electricity generation activities in terms of maintaining or increasing electricity generation capacity, avoiding, reducing or displacing greenhouse gas emissions, and maintaining or increasing security of electricity supply.

Renewable electricity generation activities also may have a range of costs. The costs will be financial and other matters noted on pages 31-32 of the section 32 report including pressure on the transmission network, greater capacity requirements, and potential adverse effects arising from the use and development of natural and physical resources. These costs may also be of national significance.

Decision making under the RMA requires an assessment of all the relevant costs and benefits in order to make an informed and efficient decision. The proposed policy is limited to recognising benefits while ignoring the issue of costs. This policy could result in unbalanced benefit-driven decision-making. The costs of renewable electricity generation, including adverse effects on historic heritage, could be ignored under this policy.

Requested change: Policy 1

To recognise the potential benefits and costs of renewable electricity generation, the NZHPT seeks the amendment of the policy to state:

The benefits of renewable electricity generation activities, at any scale, are of national significance. Decision-makers must have particular regard to the national, regional and local benefits **and costs** relevant to renewable electricity generation activities. **The benefits of renewable electricity generation activities** may include, but are not limited to:

- (i) Maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions
- (ii) Maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation.

Policy 2. Acknowledging the practical constraints associated with the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities.

All renewable electricity generation projects involve, by nature, natural and physical resources. Hydro projects, for example, can only be located in river or lake systems. In a similar manner, large wind farm projects can only be located on prominent windy locations, generally hilltops and ridgelines. Many existing renewable electricity generation projects are currently located within sensitive environmental areas, including National Parks.

The NZHPT acknowledges that consent authorities should be aware of the practical constraints facing renewable electricity generation activities. The NZHPT, however, is concerned that the policy may result in a number of potential consequences for

environmental management as discussed on pages 38-39 of the section 32 report. These potential consequences include:

- ‘Help define the information that should be supplied to decision-makers and the matters that decision-makers are required to consider.’
- Encouraging a ‘very favourable regulatory framework for renewable generation projects.’
- Requirement of ‘project proponents to show that the most advanced technical solutions for avoiding or mitigating adverse effects have been given due consideration.’
- Potential to ‘increase pressure to develop renewable generation projects in areas that are not appropriate, such as iconic landscapes or sensitive river systems.’

The NZHPT is concerned that the policy for recognition of practical constraints will override a balanced consideration of adverse environmental effects as required by section 88 and the 4th schedule of the RMA. Despite the statement on page 39 of the section 32, the policy does not explicitly require project proponents to show the most advanced solutions for avoiding or mitigating adverse effects.

The NZHPT is also concerned that the policy will increase pressure on iconic landscapes and sensitive river systems, including heritage landscapes. Despite section 6 and 7 of the RMA in relation to heritage and landscapes, and the existing objectives and policies in RMA policies and plans, the existing regulatory environment is weak, in the rural environments in particular. Many regional and district plans do not identify and protect landscapes, including heritage landscapes. Thus, the renewable electricity generation policy could have major consequences for the environment in those districts where environmental regulation is weak or deficient.

The NZHPT proposes that Policy 2 is reconsidered. As an alternative, the NZHPT suggests that the NPS should, in the first instance, recognise the potential adverse and positive environmental effects of renewable electricity generation. Following recognition of potential adverse and positive environmental effects, the practical constraints and realities should be taken into account.

Requested change: Policy 2

To recognise the potential adverse and positive environmental effects and the practical constraints of renewable electricity generation, the NZHPT seeks the amendment of the policy to state:

When considering proposals to develop, upgrade, maintain or operate renewable electricity generation activities, the range of adverse environmental effects should be avoided, remedied or mitigated.

As part of an assessment of environmental effects, relevant and practical constraints and realities should be taken into account including:

- (i) The nature and location of the renewable energy source.

- (ii) Logistical or technical practicalities associated with developing, operating or maintaining the proposed renewable electricity generation activity
- (iii) The nature and location of existing renewable electricity generation activities
- (iv) The location of existing structures and infrastructure including, but not limited to, roads, navigation and telecommunication structures and facilities, the local electricity distribution network, and the national grid.

Policy 3. Having regard to the relative reversibility of adverse effects associated with particular generation types

Policy 3 is designed to favour those renewable electricity generation activities that may result in adverse environmental effects that are reversible to a degree. Reversibility of environmental effects is not defined in the RMA in section 3 (meaning of effect) and the 4th Schedule. The term has essentially emerged as part of planning practice and is ‘open to interpretation’ as stated in the section 32 report (page 41). For example, the Environment Court commented on the reversibility of proposed changes to the Canterbury Museum and noted that changes were only ‘theoretically reversible’ considering the financial restraints and the interlocking of the proposed changes (that one change could not be reversed without affecting others).⁸

Reversibility, as a terms sometimes used in planning practice, is akin to the concept of reversion or revert which means ‘to return to a previous state’.⁹ Reversibility has a different meaning from ‘temporary’ which means of short duration or for a limited time.¹⁰

Reversibility is often hypothetical because of the dynamic nature of the environment and the changing nature of human values and perceptions of what are acceptable effects. For example, we cannot anticipate if future generations would accept the reversion of a 2008 state of the environment in say 2010 or beyond.¹¹ Consequently arguing that one form of renewable electricity generation activity is more ‘reversible’ than another (for example, hydro versus wind) is a fruitless exercise.

Historic heritage is a finite resource.¹² An archaeological site, for example, once destroyed is gone forever. The effects may be assessed to be adverse, permanent and possibly cumulative as provided for in section 3 of the RMA. An additional assessment of reversibility is not helpful or required.

The NZHPT is concerned that policy 3 introduces a new meaning of effects that is absent in section 3 of the RMA and would be open to interpretation and lacks clarity. The policy could result in renewable electricity generation activities being proposed on the basis of ‘reversibility’ that is contrary to the RMA leading to conflicting interpretations and uncertainty between the NPS and the RMA.

The NZHPT suggests that policy 3 is removed and the status quo is retained in terms of a reliance on section 3 and the 4th Schedule of the RMA. Alternatively, the term

⁸ *Canterbury Museum Trust Board v Christchurch City Council*, C059/06 (para 55)

⁹ *The Concise Oxford Dictionary of Current English*, Oxford University Press, 1995, p 1179

¹⁰ *ibid*, p 1435

¹¹ The dynamic nature of environmental values is acknowledged in the section 32 report, page 13

¹² *New Zealand Historic Places Trust/Pouhere Taonga v Christchurch City Council*, C173/2001 (para 93)

‘relative degree of reversibility’ could be removed and the policy be broadened to cover the full and proper consideration of all relevant adverse environmental effects.

Requested change: Policy 3

To remove uncertainty relating to the concept of reversibility and its application to renewable generation activities, the NZHPT requests either:

- Policy 3 is deleted from the NPS.
- Retain policy 3, but delete the words ‘relative degree of reversibility’ and the policy is broadened to include the full and proper consideration of all relevant adverse environmental effects.

Policy 4 Enabling identification of renewable electricity generation possibilities

It is appropriate that RMA regional and district plans and policies include objectives, policies and methods to promote renewable electricity generation. Policy 4, however, goes further by requiring plans and policy statements to identify potential sites and energy sources for renewable electricity generation.

The NZHPT is concerned that the focus of policy 4 is to ‘enable’ development rather than empowering local authorities to carry out constraints mapping for renewable electricity generation in terms of identifying specified forms of use or development and areas that will and will not be appropriate. As an example, the Porirua City Council recently proposed a district plan change for wind farms (Plan Change 7) which introduces new objectives, policies and rules relating to renewable energy and wind farms. The proposed rules provide new assessment criteria for wind farms as a discretionary activity provided they are not located in a Landscape Protection Area.

The Porirua City District Plan Change 7 would be the type of changes to district plans that should be initiated following the NPS. Local authorities should be able to manage appropriate and inappropriate forms of renewable electricity generation development within their territory or region. To require local authorities to enable renewable electricity generation development by requiring the identification of potential sites and energy sources is improper and would be costly.

Requested change: Policy 4

To empower local authorities to introduce appropriate policy and plan provisions to promote renewable electricity generation, the NZHPT seeks the amendment of the policy to state:

Policy statements and plans shall include objectives, policies and, where appropriate, methods, to promote appropriate renewable electricity generation and research-scale investigation into emerging renewable electricity generation technologies and methods.

The NZHPT suggests that this policy is supported by non-statutory guidance that provides model best practice provisions for policy statements and plans relating to renewable electricity generation.

Policy 5 Supporting small and community-scale renewable electricity generation

The NZHPT supports the development of small and community-scale renewable electricity generation activities that have minimal environmental effects. This approach is supported by the Parliamentary Commissioner for the Environment in *Get smart, think small, local energy systems for New Zealand, 2006*. The NZHPT agrees that policy statements and plans should include provisions to promote appropriate small-scale renewable electricity generation. The wording of the policy should, however, focus on promotion rather than enabling and not be overly demanding of local authorities.

Requested change: Policy 5

To empower local authorities to introduce appropriate policy and plan provisions to promote small-scale renewable electricity generation, the NZHPT seeks the amendment of the policy to state:

Policy statements and plans shall include objectives, policies and, where appropriate, methods, to promote small and community-scale renewable electricity generation that have minimal environmental effects.

The NZHPT suggests that this policy is supported by non-statutory guidance that provides model best practice provisions for policy statements and plans relating to small and community-scale renewable electricity generation.

Summary of NZHPT requested changes

Section	Summary of request
	National guidance be prepared for RMA section 6 landscape-related matters including outstanding natural features and landscapes, significant indigenous vegetation, indigenous fauna habitats, Maori heritage, historic heritage and recognized customary activities
Entire NPS	The NPS should assist in achieving section 6(f), RMA
Entire NPS	The NPS should give greater recognition to the principles of the Treaty of Waitangi
Preamble	Amendments to recognize the complex costs and benefits of renewable electricity generation and provide greater recognition of Maori values and the principles of the Treaty of Waitangi
Objective	Amendment to recognise the Government’s intention to safeguard the environment
Policy 1	Amendments to recognise the costs and benefits of renewable electricity generation activities
Policy 2	Amendments to ensure the range of adverse environmental effects should be avoided, remedied or mitigated
Policy 3	Delete policy 3 or delete the words ‘ relative degree of reversibility to a degree’ and replace with a policy that is broaden to include consideration of all relevant adverse environmental effects
Policy 4	Amendment to provide for the introduction of appropriate objectives, policies and methods to promote appropriate renewable electricity generation
Policy 5	Amendment to provide for the introduction of appropriate objectives, policies and methods to promote appropriate small and community scale renewable electricity generation that have minimal environmental effects

The NZHPT does wish to be heard in support of this submission.

Please don't hesitate to contact Robert McClean, Senior Heritage Policy Adviser, in regard to these comments if further information or clarification is required.



Historic Albion Battery Boiler, Terawhiti Station, Wellington, September 2008. The Albion battery site is part of the Project Westwind wind turbine project. The historic site was threatened by an access road for construction of the wind turbines. The construction of the access road has been achieved by Meridian Energy while ensuring minimal damage to the historic site as required by RMA consent conditions and the NZHPT's archaeological authority. Photo, R.McClean, NZHPT.

Signed

A handwritten signature in black ink, appearing to be 'NJ' followed by a long horizontal line.

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