

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:

[give details]

Please see attached document for details of submission.

My submission is:

[include –

- *whether you support or oppose the specific provisions or wish to have them amended;*
and
- *the reasons for your views].*

Please see attached document for details of submission.

I seek the following changes to the proposal:

[give precise details].

Please see attached document for details of submission.

I wish to be heard in support of my submission.



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

30 October 2008

Date

(A signature is not required if you make your submission by electronic means.)

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30 October 2008

Board of Inquiry
Proposed National Policy Statement
for Renewable Electricity Generation
c/-PO Box 10362
Wellington 6143

Attention: Melissa Keys

Dear Ms Keys

SUBMISSION TO THE BOARD OF ENQUIRY FOR THE PROPOSED NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

The South Waikato District Council appreciates the opportunity to submit on the proposed National Policy Statement (NPS) for Renewable Electricity Generation. This submission outlines the South Waikato District Council's overall support for the NPS, however further work should be undertaken on the areas outlined below:

1. The NPS does not provide guidance to Council on the interpretation of Cost Benefit Analysis that may be presented to support small community-scale renewable generation projects. Whether a project's energy benefits should or should not be favoured over the localised environmental costs should be made clear in order to provide guidance in the decision making process.
2. The NPS only broadly defines small and community-scale distributed electricity generation as being less than four megawatts. What would happen when several properties decide to construct a small hydro or wind turbines to generate power? Collectively these would be greater than four megawatts but less individually and may have a greater cumulative environmental effect. The cumulative effect of such projects needs to be accounted for.
3. The NPS needs to be adaptable to changes in technology around localised community-scale electricity generation. What may be uneconomic now may be economic in the future with the increased cost in electricity. This links back into point two where Council would need to address the cumulative effects of several small and community-scale renewable energy projects on the environment
4. Council should not be tasked with undertaking investigative research to identify potential sites and energy sources for electricity generation. The current wording of the NPS Policy 4 indicates that Council would be required to undertake the necessary investigations and research work to enable the identification of possible sites. The generators that wish to obtain consent for renewable electricity generation should undertake such investigations and not the Council necessarily, but it could choose to do so.

The focus of Councils submission is around ensuring that the visual component of the district's rural landscape is protected while providing opportunities for the community to utilise natural resources within the district for electricity generation.

In summary, the district's rural landscape is seen by the community as an asset, as shown in the recent Transpowers proposal to upgrade the capacity of its transmission lines within the district. Future proposals of small scale wind power or hydro may create similar debate between Council and public under this NPS. The NPS sets out to address conflict between different interest groups that may arise from such development, by providing better guidance under the RMA to Councils when making decisions through the planning process. The NPS defines small and community-scale as "renewable electricity generation projects with an installed capacity of less than four megawatts". The cumulative effects of small community-scale localised projects are not addressed in the NPS and may result in Council losing control over the scale and possible invasive nature of such developments in our rural environment.

The NPS however provides opportunities to our rural communities to become more sustainable through utilising wind and small scale hydro to meet some of their energy demand. There is also scope within this NPS to support community-scale renewable electricity generation, which assists sustainability within the district's rural communities. Both of these scenarios enhance the future economic sustainability of farming and other rural activities in our district.

Through impending District Plan review process, this NPS will directly influence how Council zones land for possible renewable electricity generation and how Council supports small and community-scale renewable electricity generation in the district. Council would be required to introduce objectives, policies and where appropriate to enable activities associated with achieving Policy 4 and 5 of the NPS into the District Plan; "Enabling identification of renewable electricity generation possibilities" and "Supporting small and community-scale renewable electricity generation".

Overall, the South Waikato District Council supports in principle the NPS, with it providing opportunities to our communities in becoming more sustainable. However, the points raised in this submission should be addressed as these may directly affect communities in the South Waikato today and into the future.

The South Waikato District Council would welcome the opportunity to be heard in support of this submission.

Yours faithfully



Neil A Sinclair MNZM JP BDS

MAYOR



D Hall

CHIEF EXECUTIVE