



File Ref: PP-15-15.v01

20 October 2008

The Chairperson
The Board of Inquiry National Policy Statement Renewable Electricity Generation
c/o PO Box 10362
WELLINGTON 6143

Dear Sir/Madam

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

Introduction

1. This is a submission on the Proposed National Policy Statement for Renewable Electricity Generation that was publicly notified on 5 September 2008.
2. The New Plymouth District Council (the council) thanks the Board of Inquiry for the opportunity to make a submission on the Proposed National Policy Statement for Renewable Electricity Generation.
3. Due to the submission period timeframe, this submission currently represents council Officers' views. Therefore, the council Officers' submission will be reported to the council Policy Committee for recommendation to the Full Council for confirmation (including any additional changes/comments from council) and will be subsequently confirmed to the Board of Inquiry.

The Submission

4. The council's submission relates to the Proposed National Policy Statement for Renewable Electricity Generation in its entirety.
5. The council supports in principle the development of national policy statements where they are able to provide clear, meaningful, useful and constructive guidance to local authorities on matters of national significance. The preparation of a national policy statement to recognise the importance of renewable electricity generation is generally supported.
6. The council agrees that there are national benefits of renewable electricity generation but considers that territorial authority decision making on applications must weigh up national benefits against the effects at a local level.
7. The New Plymouth District Plan (NPDP) is an effect based plan, with focus on avoiding, remedying or mitigating the effects of activities in accordance with the

requirements of the Resource Management Act 1991 (the Act), rather than being prescriptive about activities. The council considers that section 7(j) of the Act, which requires council decision makers to have regard to the benefits to be derived from the use and development of renewable electricity generation, in conjunction with the requirements of the NPDP, more than adequately provide for certainty in relation to potential renewable energy projects within the New Plymouth District.

8. The council therefore supports the view with respect to Policy One, in that there is no direct requirement for district plans to be changed or amended to give effect to the policy.
9. The council also supports the view with respect to Policy Two in that there is no direct requirement for district plans to be changed or amended to give effect to the policy.
10. The council would need to amend the NPDP in relation to Policy Four. Therefore, council work programs and budgets would need reviewing to accommodate this work requirement. Council is concerned with the use of the word 'enabled' and the fact that there are a very large number of ways to generate electricity and a wide spectrum of potential effects. Council is therefore concerned that specialist training for staff, and/or use of consultants would be required to give effect to the requirement for 'methods' within this policy, and that the section 32 has not considered this, nor its potential cost. Council would therefore welcome guidance that clarifies that council will not be required to identify potential renewable electricity generation sources within its district, but rather merely include objectives and policies within the NPDP for specific consideration by decision makers.
11. Similarly, council is concerned that to give effect to Policy Five it will have to investigate technologies suitable for communities to give effect to this policy. Again, this will require specialist training for staff, and/or use of consultants to give effect to the requirement for 'methods' within this policy. The section 32 report has not considered this, nor its potential cost.
12. Council also consider that implementation of the NPS has the potential to be controversial and therefore result in appeals to the Environment Court in relation to changes to the NPDP. Again, the section 32 has not considered this potential cost.
13. Council supports the notion of Renewable Electricity Generation, but does not consider the section 32 is an accurate reflection of alternatives, nor of the true implications for territorial authorities. Further, without specific guidance providing a clear interpretation of the requirements of the NPS, it is impossible to accurately determine just what the implications are. Council fails to see how Table 13 in Appendix A of the section 32 report considers sensitive areas assessment and innovation to both be not applicable.
14. Council supports the inclusion of a common date to give effect to the Proposed NPS on Renewable Electricity Generation, and the National Policy Statement of Electricity Transmission to reduce potential processing costs. However, it should be noted that the combined costs associated with the combined work arising from all central government policy initiatives is potentially a considerable burden on territorial

authorities. The NPS and NES being promoted by the Ministry for the Environment and the Proposed NZCPS review by the Department of Conservation, all add to existing council workloads and therefore add cost to the New Plymouth District community.

15. The council again thanks the Board of Inquiry for the opportunity to make a submission on the Proposed National Policy Statement for Renewable Electricity Generation.
16. The council does wish to be heard in support of its submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Frank Versteeg', with a long horizontal flourish extending to the right.

Frank Versteeg
General Manager Strategy and Policy

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