

**Further submission in support of, or in opposition to,
submission on the publicly notified proposed national policy
statement for renewable electricity generation**

To the Chairperson
Board of Inquiry

Name of person making further submission:

Paulina Wilhelm Senior Policy Planner Rotorua District Council Private Bag 3029 Rotorua Mail Centre

This is a further submission in support of, or in opposition to, a submission on the proposed national policy statement for renewable electricity generation (the proposal).

1) I support the submission of:

NZ Petroleum Exploration and Production Association. Submitter No 2.

The particular parts of the submission I support are:

Policy 3. Submits that the reference in Policy 3 to the "relative degree" of reversibility could potentially be relied on to require the Council or the Court to pass judgement on the relative merits of different projects. This trespasses on the role and capacity of relevant energy sector regulators and decision makers and is beyond the intended RMA inquiry. Requests the addition at the end of the words "in the context of the particular projects and given the broader needs of the relevant community." so that consideration being given to the relevant proposals is not merely an objective exercise of weighing up the pros and cons of different technologies themselves.

The reasons for my support:
Same reasons as in submission above

I seek that part of the submission be allowed:

RDC: Support the addition of "in the context of the particular projects and given broader needs of the relevant community"

2) I support the submission of:

South Taranaki District Council. Submitter No 6.

The particular parts of the submission I support are:

Policies 4 and 5. Requests clarification if the term "enable." The Council seeks clarification as to whether it is intended to equate with Permitted Activity Status?

The reasons for my support:

Lack of clarity by using the word 'enable'. Local authorities need more certainty when assessing resource consents.

3) I support the submission of:

Rodney District Council. Submitter No 7.

The particular parts of the submission I support is:

Policy 1. Considers that a wider range of benefits of renewable electricity generation be identified in Policy 1, including but not limited to;

- Security of supply
- Reduction in greenhouse gas emissions
- Reduction in dependence on the national grid
- Reduction in transmission losses
- Reliability
- Development benefits
- Contribution to the renewable energy target.

I seek that part of the submission be allowed:

RDC: the inclusion of the security of supply in the policy

4) I support the submission of:

Kapiti Coast District Council. Submitter No 11.

The particular parts of the submission I support is:

Policy 4. Concerned by use of the term "enable", as its meaning is not clear and could imply that Council would actively encourage or promote these activities.... Suggest that it would be clearer to replace "enable" with "remove unnecessary barriers to" or a similar phrase.

Policy 5. As in Policy 4, feels that "enable" could more accurately be replaced by "remove unnecessary barriers to".

I seek that part of the submission be allowed:

RDC: to replace 'enable' with 'remove unnecessary barriers to'

5) I support the submission of:

Taranaki Regional Council. Submitter No 15.

The particular parts of the submission I support is:

Policy 1. "Furthermore, a potential unintended policy implication of the NPS is that the renewable electricity generation use of resources will over-ride all other aspects, even those that may be nationally important for other values such as for recreation, water supply and natural values. "

The reasons for my support:

RDC: matters of national importance should not be disregarded in favour of the NPS.

6) I support the submission of:

Gisborne District Council. Submitter No 18.

The particular parts of the submission I support is:

Policy 3. Suggests amendment to Policy 3 to strike out the word "relative".

I seek that part of the submission be allowed:

RDC: would like for the word 'relative' be deleted because it is not adding clarity to the policy.

7) I oppose the submission of:

Mainpower. Submitter No 19.

The particular parts of the submission I oppose is:

Other. MainPower is of the view that concerns about the environmental effects of renewable energy should not be reflected in a NPS to support renewable energy.

The reasons for my opposition:

RDC: Environmental effects should be considered in the NPS.

The particular parts of the submission I oppose is:

Policy 2. Considers the wording of Policy 2 is unclear. MainPower understands that the intention of the policy is to recognise that developers of renewable energy projects often face constraints for example location of the energy source, location of existing renewable activities, location of infrastructure. These constraints can limit the ability of a developer to avoid, remedy or mitigate any adverse environmental effects associated with a renewable energy project. The policy needs to be amended to make its purpose clearer.

The reasons for my opposition:

RDC: the assessment associated with the avoidance, remedy and mitigation of adverse effects should always be taken into consideration when assessing new applications for renewable energy projects. This is our obligation under the RMA.

8) I support the submission of:

Linda Conning. Submitter No 21.

The particular part of the submission I support is:

Policy 1. Re write Policy 1 so as to convey that renewable energy is to be favoured if it is appropriately located, at appropriate scale, and that those who are to suffer adverse effects are adequately compensated. "No-go" areas should be set out nationally to ensure our cultural and natural heritage is not destroyed for future generations by our short term desires to consume energy. Outside of these 'no-go' areas, local authorities, in consultation with their

communities, need to consider at what locations and at what intensity of development various forms of renewable energy is appropriate. This should include 'favoured locations' as well as "no-go" areas.

The reason for my support is:

RDC: Areas of outstanding natural value or other significant value should be identified and protected from adverse environmental effects of any land use change including renewable energy projects. Support the identification of "no-go areas".

I seek that part of the submission be allowed:

RDC seeks identification of suitable areas and 'no-go' areas.

9) I support the submission of:

Waikato District Council. Submitter No 28.

The particular part of the submission I support is:

Objective. Recommends amendments to the objective to add the phrase "while managing the adverse effects of these activities".

I seek that part of the submission be allowed:

RDC: the addition of "while managing the adverse effects of these activities"

The particular part of the submission I support is:

Policy 3. Seeks a definition of reversibility be included "along the lines of 'the partial or complete removal of the structure results in the surrounding environment returning to a state that is comparable to its pre-development state/original condition'.

The reasons for my support:

The term 'reversibility' is not clear and will be open to interpretation

I seek that part of the submission be allowed:

RDC: Support the suggestion that a definition of reversibility be included along the lines suggested.

10) I support the submission of:

Environment Canterbury. Submitter No 31.

The particular parts of the submission I support are:

Policy 5 is supported by Environment Canterbury. Environment Canterbury commends MfE for this policy and suggests that Policy 5 is given more prominence within the NPS.

It is considered however that Policy 5 could be constrained by the current definition of "small and community-scale distributed renewable electricity generation". ...A suggested alternative definition follows:

“Small and community-scale distributed renewable electricity generation” means electricity generation from a renewable source, for the purpose of supplying electricity to a particular site or an immediate community via local transmission lines, and where the adverse effects of the generation activity are minor or less than minor.

I seek that part of the submission be allowed:

RDC: Support that policy 5 should be given more prominence.

11) I support the submission of:

Tauranga City Council. Submitter No 32.

The particular part of the submission I support is:

Policy 5. TCC questions whether a 4MW threshold is appropriate and does not support the threshold of 4MW without further information being provided on what type of renewable activities 4MW actually entails to enable consideration of the actual effects on the environment.

The reason for my support is:

RDC: Councils need to know what does a 4MW threshold means in terms of the size of the energy project considered. It is not clear what would a small size wind turbine produce in relation to a big wind turbine. The differences in size and type of energy project will have very different impacts on the environment therefore we suggest that the use of 4MW as a threshold be removed.

12) I support the submission of:

Bioenergy Association of NZ Inc. Submitter No 43.

The particular parts of the submission I support are:

Policies 1, 2, 4 and 5 should be rewritten replacing the words 'electricity generation' with the word 'energy'.

The reasons for my support:

RDC: Support broadening of the NPS to cover energy rather than electricity.

I do not wish to be heard in support of my submission.

.....**Paulina Wilhelm**.....
Signature of submitter (or person authorised to sign on behalf of submitter)

.....**26 December 2008**.....
Date

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

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