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New Zealand Energy Limited
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Ministry for the Environment
PO Box 10362
Wellington

email; renewable.electricity@mfe.govt.nz

Dear Sir / Madam

National Policy Statement for Renewable Electricity Generation

This is a submission on the proposed national policy statement for renewable electricity generation.

New Zealand Energy owns and operates a number of small hydro power stations throughout New Zealand including the stand alone power supply system at Haast.

New Zealand Energy has an interest in developing further distributed renewable electricity generation resources with planning and consenting well under way for a site near Murchison in the South Island.

It is our experience that the single largest barrier to implementing such systems and achieving the Governments goal of 90 percent renewable generation by 2025 is the difficulty of obtaining consent under both the resource management and conservation acts.

This difficulty exists not directly because of the acts but because a very small and vocal minority of objectors within New Zealand have acquired disproportionate power from the mechanisms in the acts that are (quite rightly) designed to protect the environment

General Comments

We welcome the concept of the NPS as an overdue move to represent the views of the vast majority of New Zealand people. We in general support the proposed NPS as drafted but wish to support the following comments made by previous submitters.

Submitter: Councils in general;

In general we note the comments by Councils around the country that the proposed NPS provides inadequate guidance for them to make decisions. We disagree as we believe the NPS sets a very good background for Council decision making, all the Councils need to do is get on and make those decisions.

Policy 1 – National importance

Submitter: Various;

Comment: A number of submitters have proposed policy 1 should further describe the benefits of renewable generation. We consider policy 1 as written adequately makes the point that the matter is of national significance and requires no further wording to convey that message.

Policy 2 – Practical constraints

Submitter: Trustpower and others.

Comment: We agree with Trustpower and the proposed policy that consenting authorities should be required to have particular regard for the constraints on achieving avoidance, remediation or mitigation however we also agree with Trustpower that access to land, particularly in the conservation estate, is problematic.

We would like to see the NPS provide that the Crown advocate in support of land access, or at the very least ensure that barriers to access are not compounded by restrictive regional and district planning provisions.

Policy 3 – Reversibility

Submitter: Trustpower and many others

Comment: We oppose policy 3. Regardless of the reality of reversing the effects of installed generation technologies this policy will be seized on by the minority of objectors and used as a major argument against all development, but especially hydro.

Wind generation is a good thing but has its limitations (as does hydro) and in the complete picture we need a balanced mix of both. This policy is unnecessary and will prove a greater hindrance to the development of a sustainable future generation than help to the environment.

Policy 4 – Enabling Identification

Submitter: Trustpower and Councils

Comment: We support this policy however the wording seems to have confused many people and for that reason alone needs to be changed.

From our experience Councils simply need to remove the plethora of unreasonable and unnecessary barriers they currently place in the way of the implementation of renewable generation in order to achieve the stated objective of enabling the relevant activities.

This would in itself encourage investors to get on and identify potential energy sites and resources (of which there is no shortage) and follow through with investment and construction.

As a further variation on expected council involvement we consider it would be reasonable to require that councils offset the energy that will be consumed by housing and commercial development within their districts with approvals for renewable generation projects. We also believe that when considering competing requests for water take, Councils should be required to give priority to hydro generation requirements.

Policy 5 – Small and community scale renewable generation.

Submitter: Trustpower and others

Comment: We support the concept of policy 5 but make the following comments;

- a) Councils take for ever to implement these plan changes while as a community we continue to burn fossil fuels to meet our energy needs. The time frame should be significantly reduced for implementation of this policy and compliance management along with consequences for non achievement should be implemented.
- b) We see no reason to limit the size to 4MW as it is not unreasonable for community scale embedded generation to exceed this. We believe there should be no size limit at all.

As a small company focused on hydro generation we find it difficult to keep up with consultation and would appreciate you putting us on a list of parties interested in being consulted on relevant issues.

Yours Sincerely

David Inch
Manager