

31 October 2008

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

Dear Sir/Madam

RE: Proposed National Policy Statement- Renewable Electricity Generation

1.0 The Christchurch City Council (the Council) supports the development of a National Policy Statement on Renewable Electricity Generation (NPS) as a means of implementing the NZ Energy Strategy. The Council adopted its Sustainable Energy Strategy for Christchurch in September 2007 and supports a NPS that better aligns national interests with local interests.

2.0 General Comments

1. The Council supports the need for the NPS and the need to provide for diverse electricity generation to ensure a reliable and consistent supply of electricity to the country which can be maintained into the future. However, the Council considers the NPS as presently written too vague to provide clear guidance to territorial authorities as to how to achieve it.

2. As presently written the NPS is mainly concerned with ensuring the security of electricity supply. The Council submits that the NPS should also provide national guidance to ensure the natural environment from which electricity is generated is also protected and sustainably managed.

3. The Council is concerned that the proposed NPS does not recognise or provide for direct renewable energy use (for example solar water heating). The NPS should encourage efficient energy use and provide for the direct use of renewable energy resources (instead of conversion to electricity).

3.0 Objective

1. The NPS preamble alludes to the environmental effects of developing electricity generation. The Council suggests that this recognition should also be included in the NPS Objective. At present the Objective is orientated to ensuring a consistent and secure supply of electricity. The Council suggests that the Objective be amended to ensure the sustainable management of the natural environment. Renewable electricity generation plays an important role in New Zealand's environmental, social, cultural and economic well-being and these elements all need to be recognised.

2. The NPS target of 90% of electricity from renewable sources provides a clear focus and priority for renewables over non-renewables. The Council would however be concerned if it resulted in additional generation being given priority over end use energy efficiency improvements or direct use renewable energy options such as solar hot water or passive solar design.

Decision sought

(i) Amend the Objective to recognise the benefits of direct use of renewable energy and the potential adverse effects of additional generation capacity on our environmental, social, economic and cultural well-being:

“To achieve 90 percent of New Zealand’s electricity generation being derived from renewable energy sources, while giving effect to the sustainable management of the natural and physical environment. This includes recognising the sustainability benefits of direct renewable energy use and greater energy efficiency.” or similar.

4.0 Policy 1

1. As presently written it is unclear as to what the Policy is trying to achieve. The Policy does not provide additional guidance to local authorities when attempting to assess the benefits of renewable electricity generation against other values (such as a site’s cultural or environmental value). It is unclear what the benefits are other than the reduction of greenhouse gases. Similarly it is unclear whether the benefits the Policy mentions are due to the cumulative effects of renewable electricity generation and not electricity generation at an individual scale. If this is the case then it should be clearly stated in the Policy.

Decision sought

(i) Amend Policy 1 to read:

“...Decision-makers must have particular regard to the national *environmental, social, cultural and economic* benefits relevant to renewable electricity generation activities. These benefits may include:...” or similar.

(ii) State what the anticipated benefits are.

5.0 Policy 2

1. The Council supports the intent of the Policy, but is unclear as to how the Policy provides additional guidance to Councils.

2. The Council suggests that the Policy be aimed at “decision-makers” rather than “consent authorities” as consent authorities do not have control over some aspects of what the Policy is trying to achieve (for example clause 2 (ii)). The Council also suggests that the order in which the clauses are presented be reversed to make the Policy clearer.

3. The Council is also of the opinion that adverse environmental effects should not only be considered but be managed as well. The Council recommends including this after the list of constraints.

Decision sought

(i) The Policy be amended to read:

“...generation activities, *decision-makers* must have particular...by:

i. the location...

ii. the nature and location...

iii. logistical or technical...

iv. the location of existing...

while providing adequate management of adverse effects.” or similar.

6.0 Policy 3

1. The Council is unclear as to the intent of this Policy. If the Policy is meant to discourage certain types of generation schemes (for example large hydro schemes) this should be presented clearly. The Council is concerned that as presently written this Policy could set a precedence for generation schemes that are seen to have reversible adverse effects. The Council is of the opinion that once infrastructure is in place it is unlikely that the scheme will be deconstructed as the demand for energy is unlikely to reduce.

Decision sought

(i) Clarify the intent of Policy 3 or delete the Policy.

7.0 Policy 4

1. Experience does not show that obtaining consents for trial activities are onerous. Regional and District Plans need to provide a balanced assessment of the effects of all activities when assessing resource consent applications. Conditions set should be relative to the effect of the activity on various values and not only consider the benefits of the activity. For example, a windmill was installed at Gebbies Pass, Banks Peninsula in 2003. Using the provisions provided in the Banks Peninsula District Plan, noise issues, effects on amenity values and other environmental issues were assessed against the benefits of producing additional electricity from a renewable source.

2. The Council considers that Policy 4 would provide additional value if specific matters over what Councils could have discretion over were identified. The Policy could also identify the investigation methodologies or technologies that Plans are to enable.

3. The terms "research-scale investigation" and "emerging technologies" require definition.

4. The Council suggests that the specific timeframe to notify variations be removed and instead require that this occurs when Plans are next reviewed. The Council will be planning for its review of the Christchurch City Plan and the Banks Peninsula District Plan within the next 6 years. Including amendments during the review of the two Plans would allow for better management of the resources needed during the review process.

Decision sought

(i) Amend Policy to read:

"Promote identification of renewable electricity generation possibilities"

"When planning and policy documents are next reviewed or within the next 6 years (if this occurs first), local authorities are to notify...to enable activities associated with:

(i)...

(ii)...

...provided the adverse effects of such activities are avoided, reduced or mitigated."
or similar.

8.0 Policy 5

1. The Council is supportive of a Policy that encourages electricity generation at a community scale, however the Council suggests that the Policy should provide guidance to what activities Councils limit their discretion over when assessing small and community-scale electricity generation.

2. The Council also considers the current definition of “small and community-scale distributed renewable electricity generation” to be limited as the definition uses an installed capacity limit. The Council is of the opinion that even a capacity limit of four megawatts has the potential to adversely affect the environment. The Council therefore submits that small and community-scale generation be defined by the relative scale, intensity and environmental impact of the activity. The Council supports the definition suggested by ECan where:

“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 the local transmission lines, and where the adverse effects of the generation activity are minor or less than minor.

3. As for Policy 4, the Council also suggests that the specific timeframe to notify variations be removed and instead a reference made to when Plans are next reviewed. The Council will be planning for its review of the Christchurch City Plan and the Banks Peninsula District Plan within the next 6 years. Including amendments during the review of the two Plans would allow for better management of the resources needed during the review process.

Decision sought


(i) Amend Policy to read:

“When planning and policy documents are next reviewed, or within 6 years (if this occurs first) local authorities are to notify...renewable electricity generation. or similar.

Concluding Remarks

- 6.1 Council again thanks the Ministry for the Environment and the Board of Inquiry for the opportunity to make a submission on the Proposed National Policy Statement on Renewable Electricity Generation.
- 6.2 The Council does not wish to be heard in support of this submission.
- 6.3 If you require clarification on the points raised in this submission or additional information, please contact Melissa Renganathan, Policy Analyst on 03 941 8169 or melissa.renganathan@ccc.govt.nz

Yours faithfully



Tony Marryatt
CHIEF EXECUTIVE