

31 October 2008



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Dear Sir or Madam

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

Thank you for the opportunity to consider and make a submission to the Proposed National Policy Statement for Renewable Electricity Generation.

Please find Horizons Regional Council's submission attached. This is a hard copy of Horizons' submission sent by email on Friday 31 October 2008.

If you wish to follow up any of the matters presented in the submission, please contact Barry Gilliland on freephone 0508 800 800.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Garrick Murfitt', written over a white background.

Garrick Murfitt  
**CHAIRMAN**

Encls Horizons Regional Council's Submission on the Proposed National Policy Statement for Renewable Electricity Generation

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

## Horizons Regional Council

### Submission on the Proposed National Policy Statement for Renewable Electricity Generation

#### Introduction

1. The following submission outlines Horizons Regional Council's view of the Proposed National Policy Statement for Renewable Electricity Generation (proposed NPS). It is influenced by Horizons' policy development for the Manawatu-Wanganui Region in the Proposed One Plan<sup>1</sup>.

#### Context

2. Horizons is reviewing its operative Regional Policy Statement and all its regional plans. The review document is known as the Proposed One Plan and it is currently in the Hearing Process prescribed by the Resource Management Act 1991.
3. Horizons recognises the benefits of infrastructure (including energy generation facilities) and the importance of developing and using renewable energy by including objectives and policies for these activities in a separate chapter from the resource based chapters.
4. Chapter 3 of the Proposed One Plan contains policies that:
  - (a) Recognise the benefits of infrastructure (Policy 3-1);
  - (b) Avoid adverse effects on infrastructure (Policy 3-2);
  - (c) Provide guidance on how adverse effects of infrastructure will be treated in decision-making processes (Policy 3-3);
  - (d) Promote renewable energy development and use (Policy 3-4); and
  - (e) Promote efficient energy use (Policy 3-5).
5. In its current form Policy 3-3 generally states that:
  - (a) Adverse effects of infrastructure in "high value areas" shall be avoided to the same extent as any other activity, unless functional constraints make this impossible; and
  - (b) All other adverse effects will be managed in a manner that minor adverse local effects are tolerated and take into account the benefits of infrastructure, its integration with land use and the benefits of the use and development of renewable energy.
6. Policy 3-4 generally supports the development and use of renewable energy and encourages local authorities to lower land use control hurdles for small domestic scale renewable energy production.
7. Submissions have been made to these policies and their content may change during the hearing process.

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<sup>1</sup> Proposed One Plan – The Consolidated Resource Policy Statement, Regional Plan and Regional Coastal Plan for the Manawatu-Wanganui Region, May 2007.

## Submission on Overall Effect of the Proposed NPS

8. Horizons Regional Council considers that a nationally consistent approach to balancing the competing values associated with the development of New Zealand's renewable energy resources would be helpful for decision-makers and provide greater certainty to applicants and the wider community.
9. Horizons notes that the majority of the costs of implementing the proposed NPS will fall on local government. We consider that the proposed NPS must add significant value to the current decision-making processes to justify the financial impact on ratepayers.
10. Horizons does not consider the proposed NPS as drafted will add value to current decision-making processes because the policies:
  - (a) In effect restate Section 7 of the RMA;
  - (b) Set out matters that are already considered in determining resource consent applications;
  - (c) Do not provide clear guidance on how consent authorities are to balance Section 6 matters, eg. coastal environment and landscapes.
11. We observe that decision-making on these matters involves a complex, often site-specific evaluation of a range of values and factors and consider that a National Policy Statement may not be the appropriate mechanism to assist consent authorities to balance these matters.
12. Horizons also has concerns about the tone of the supporting documents which can be interpreted as seeking to tip the balance clearly in favour of renewable energy projects. We hold the view that any final NPS must add value to current consent processes by helping decision-makers balance competing values, not significantly tip the balance in favour of renewable energy at the expense of avoiding or mitigating environmental effects.
13. Horizons notes the terms "decision-makers" is used in Policies 1 and 3, and "consent authorities" is used in Policy 2. We are unsure of the significance of this? We also note that the Section 32 evaluation implies that Policies 1, 2 and 3 apply only to consent decision-making, however, it can be argued that the use of the terms "decision-makers" and "consent authorities" means that these policies will need to be given effect to in regional and district planning reviews. Horizons is unsure if this is a deliberate or unintended outcome and seeks certainty in any final NPS.

## Other Submission Points

14. **Policy 1:** Horizons considers that this policy will not help decision-makers balance competing values or evaluation of Section 6 and 7 matters.
15. **Policy 2:** Horizons considers that this policy deals with matters that are already considered by consent authorities when making consent decisions on these matters. We are unclear how this adds value to what already occurs.
16. **Policy 3:** Horizons is unsure this policy is of benefit to decision-makers. Although some generation technologies may be considered more "reversible" than others, all generation facilities involve significant construction that is not reversible. Horizons is

also concerned that this policy will potentially cause a bias away from some seemingly non-reversible generation technologies such as large hydro schemes that may be in other respects more appropriate than seemingly reversible generation such as wind turbines.

17. **Policy 4:** Horizons generally supports this policy, however we are not aware of any project adversely affected by “unnecessary regulatory barriers” to identification, assessment or research-scale investigation in the Manawatu-Wanganui Region. We are concerned that the costs to implement this policy will outweigh the benefits in this Region. Horizons also submits that a plan change only be required where existing regional policies and/or plans do not give effect to this policy by the specified date.
18. **Policy 5:** Horizons generally supports this policy and notes that it is not inconsistent with Policy 3-4 in the Proposed One Plan. Horizons submits that a plan change only be required where existing regional policies and/or plans do not give effect to this policy by the specified date.

## **Conclusion**

19. Horizons supports the development a nationally consistent approach to balancing the competing values associated with the development of New Zealand’s renewable energy resources and in our view the Proposed National Policy Statement for Renewable Energy Development requires substantial redrafting to deliver this outcome.
20. Horizons wishes to be heard on this submission. Please contact Barry Gilliland on freephone 0508 800 800 or email [barry.gilliland@horizons.govt.nz](mailto:barry.gilliland@horizons.govt.nz) for further information.

Garrick Murfitt  
**CHAIRMAN**