

TARANAKI / WHANGANUI CONSERVATION BOARD TE TAI HAU-Ä-URU

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Board of Inquiry - Proposed National Policy Statement on Renewable Electricity Generation
c/- The Department of Conservation
PO Box 10 420
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**Taranaki-Whanganui Conservation Board/Te Tai Hau-A-Uru
Submission
on
*Proposed National Policy Statement on
Renewable Electricity Generation***

1. Introduction

The Taranaki/Whanganui Conservation Board/Te Tai Hau-A-Uru (the Board) extends from the Mokau River in the north to the Manawatu River at the southern end of the conservancy. New Zealand's largest concentration of wind farms is found in this part of the North Island and the Board is aware that many additional resource consent applications and proposals for further wind farms are under consideration. The Board has a role in advocacy of conservation values (including protection, restoration and enhancement of indigenous biodiversity, and also protection of landscapes which are intrinsic to our natural heritage).

The Board is aware that the Department of Conservation is actively involved in responding to resource consent applications and working with developers (there is for example a Memorandum of Understanding with Meridian Power). In the case of the proposed Turitea wind farm in Palmerston North City the Department has been working with the City Council and Mighty River Power to identify ways of mitigating the effects of the proposed wind farm through development of an eco-sanctuary.

The Board itself has also made submissions about the implications of wind farm developments to regulatory agencies (for example, on the draft Horizons One Plan and on the resource consent application by Meridian Energy for the proposed Central Wind Farm project in the central North Island. At several meetings in recent years the Board has considered the implications for conservation of proposed wind farm developments. This is a continuing strategic focus for the Board as new proposals seem likely given the government's goal of renewable electricity generation.

2. General Comments

The Board considers that a National Policy Statement on Renewable Electricity Generation is urgently needed to provide leadership for communities, energy companies, regional and territorial authorities and other planning and decision-making bodies about the need for adequate recognition to the importance of other values in particular protection of valued landscapes and indigenous biodiversity. We are aware of a number of proposed wind farm developments that involve construction on a scale that will degrade the natural integrity, aesthetic qualities of the landscape and unique geological

features of areas in our conservancy. Construction work that involves damming, diversion, bed disturbance, and the associated discharge of water and sediment, as well as vegetation clearance results in damage of habitat and other threats to native flora and fauna.

While renewable electricity generation is intuitively sound and preferable to reliance on non-renewable energy sources, this needs to be balanced with appropriate regard for protection of the natural environment. The economic benefits are often minimal and/or overstated and there is little or no 'voice for conservation' in the planning and decision-making processes. We recognise that in some developments there is an effort by the developer to support ecological protection and enhancement of areas affected by or adjacent to development for renewable electricity generation (typically windfarms). However, this mitigation is not always viable, and even if it is viable, is not provided by some developers.

The Board considers that the proposed National Policy Statement must give more recognition to the economic and other benefits of preservation of undeveloped landscapes.

National policy guidance is needed to provide greater certainty about what is appropriate development, in order to reduce some of the costs for individuals and groups in communities associated with participating in resource consent processes.

3. Specific Comments

3.1 Objective

The Board acknowledges that government policy goal of generating 90 per cent of New Zealand's electricity from renewable sources by 2025 but considers that the wording of the objective needs to **also recognise that this goal is achieved without further threats to New Zealand's indigenous biodiversity and nationally and regionally significant landscapes, and with adequate regard for the views of local communities.**

3.2 Policies

Policy 1

The Board recommends that Policy 1 be modified by adding the following:

Maintaining or increasing electricity generation, and maintaining or increasing security of electricity supply must not result in further loss or degradation of habitat for indigenous flora and fauna, or regionally or nationally significant landscapes.

Policy 3

The Board supports Policy 3 requiring decision-makers to have particular regard to the relative reversibility of adverse effects associated with proposed generation technologies but emphasises the need for a comprehensive life cycle analysis thus ensuring a very broad understanding of adverse effects.

Policy 4

The Board considers that local authorities should incorporate into policies and plans provisions for enabling appropriate renewable electricity generation, such provisions to be consistent with relevant Conservation Management Strategies and in particular their recognition of landscape and biodiversity values.

Policy 5

The Board supports promotion of small and community-scale renewable electricity generation. The Board is aware that smaller scale development may not attract such strong community opposition as frequently occurs with larger scale developments. Also, there may be lesser impacts on the ecosystem and less intrusion into sensitive landscapes. It will be necessary to define the scale of the development

(including - in the case of wind farm developments - the number and height of turbines, and area covered).

Concluding comments

The Board is not opposed to renewable electricity generation or wind farms. However, other important national goals need to be balanced with the goal of reducing carbon emissions. In the absence of a National Policy Statement on biodiversity more recognition of biodiversity goals should be included in this proposed National Policy Statement. Renewable electricity generation must be of scale and in a location that does not result in irreversible damage to biodiversity. Also, the cumulative effects of wind farm and other electricity generation need to be adequately recognised and addressed in the proposed National Policy Statement.

National policy guidance that gives greater weighting to long-term conservation values is needed to counterbalance the current, more short-term emphasis on currently popular renewable electricity generation options such as wind which may have longer-term deleterious consequences for conservation and the environment, and which may be superseded by new, less intrusive technology. National goals, such as reducing greenhouse gas emissions and increasing the use of renewable electricity should not be pursued to the detriment of the country's local biodiversity (which may be very unique) or local communities.

There needs to be more stringent requirements for consenting authorities to obtain bonds for removing electricity generation infrastructure that becomes obsolete. In addition, the proposed National Policy Statement needs to include a new policy that recognises the need for adoption of energy efficiency and conservation measures as a greater priority than simply streamlining the creation of new generation capacity.

The Board would like to present this submission at a hearing.

Yours sincerely



Darryn Ratana
Chairperson
Taranaki-Whanganui Conservation Board