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Betty Connolly



*Your Community Partner*

30 October 2008

The Board of Inquiry  
Proposed National Policy Statement on Renewable Electricity Generation  
C/- PO Box 10362  
Wellington 6143

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Dear Sir

**PROPOSED NATIONAL POLICY STATEMENT ON RENEWABLE ELECTRICITY  
GENERATION**

Please find enclosed Waikato District Council's submission to the proposed National Policy Statement on Renewable Electricity Generation, which was publicly notified on 6 September 2008.

A copy has been emailed to you on Thursday 30 October.

Yours faithfully

A handwritten signature in black ink, appearing to read "Betty Connolly". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Betty Connolly  
**POLICY PLANNER**

SECRETARY\BMC\810300\T

**FORM 3**  
**SUBMISSION ON PROPOSAL FOR**  
**NATIONAL POLICY STATEMENT**

*Section 49, Resource Management Act 1991*

To: The Chairperson  
Board of Inquiry  
C/- PO Box 10362  
WELLINGTON 6143

Submission on: The proposed National Policy Statement on Renewable Electricity Generation which was publicly notified on 6 September 2008

Name: Waikato District Council

Address: Waikato District Council  
Attention: Betty Connolly  
Private Bag 544  
NGARUAWAHIA

**1. The specific provisions of the proposal that the Waikato District Council submission relates to are:**

- the proposed National Policy Statement on Renewable Electricity Generation overall;
- the Preamble;
- the Objective;
- Policy 1;
- Policy 2;
- Policy 3;
- Policy 4; and
- Policy 5.

**2. Waikato District Council makes the following general submission:**

Waikato District Council supports the National Policy Statement on Renewable Electricity Generation in principle. The Council considers that this policy statement will support the New Zealand Energy Strategy's target for renewable electricity generation. The Council has already recognized their obligation to help reach this target by including objectives, policies and methods in the Proposed Waikato District Plan.

Notwithstanding this, Council considers that minor changes would be beneficial for clarity and have detailed these as below.

Decision Sought:

That the National Policy Statement on Renewable Electricity Generation be approved, subject to the amendments sought in this submission.

3. **Waikato District Council makes the following specific submissions to the proposed National Policy Statement on Renewable Electricity Generation and seeks the following relief:**

**The Objective**

The Council supports the intent of the objective, which is to meet the target of 90% of the country's electricity generation, from renewable sources by 2025. The Council is concerned that while the objective recognizes the need of increasing the use of renewable sources, the objective does not consider the adverse effects on the environment that may occur from these activities in achieving this target. The S32 report clearly sets out the government's commitment to renewable energy generation and states "there is no intention to support these projects at the cost of the environment." Council does not consider that this statement is reflected in the objective as worded currently.

**Decision Sought:**

Amend the objective to read:

"...renewable sources by 2025 )based on delivered electricity in an average hydrological year), while managing the adverse effects of these activities."

**The Preamble**

The Council considers that the preamble does uphold the position of the government in regards to the country's use of electricity and the challenges facing delivery of this electricity. The preamble states that development that increases renewable electricity generation can have environmental effects and that by adopting a nationally consistent approach to balancing the competing values would be beneficial. Council does not consider that the proposed National Policy Statement on Renewable Electricity Generation provides enough direction or guidance on how to balance these competing values over and above any consideration of an application under s104.

**Decision Sought:**

That further direction is provided to enable decision-makers to adequately consider and balance the competing values of nationally significant benefits contained in the proposed National Policy Statement on Renewable Electricity Generation and the possible inability to adequately avoid, remedy or mitigate any adverse environmental effects.

**Policy I**

The Council supports Policy I. The Council supports the direction of the policy to apply when resource consent decisions are being made as well as at the time of development of regional and district plans. This will allow some of the intent of the proposed National Policy Statement on Renewable Electricity Generation to be expedited in an effective manner.

**Decision Sought:**

Retain Policy I.

## **Policy 2**

The Council supports Policy 2 in that it acknowledges that there will be practical constraints associated with new renewable electricity generation developments. While there is concern that Policy 2 could hold favour in projects, Council considers that decision-makers should still weigh up all competing values during their considerations and that this policy should not be used in a manner which would negate any assessment of effects. However, as there are still individual value judgements made by decision-makers additional guidance on how to assess these constraints would be desirable.

### **Decision Sought:**

Retain Policy 2;

And:

Provide additional guidance material on how to assess constraints.

## **Policy 3**

The Council supports Policy 3. The Council considers that the policy does ensure that generators will recognize the need to take into account the reversibility aspect of any proposal as well as decision-makers when considering assessments. Notwithstanding this, there is a possibility that "reversibility" will be open to interpretation and that a definition of what is acceptable as "reversibility" would be beneficial and provide clarity.

### **Decision Sought:**

Retain Policy 3;

And:

That a definition of "reversibility" be included in the National Policy Statement on Renewable Electricity Generation to provide clarification. For example, the definition could be 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."

## **Policy 4**

The Council supports Policy 4. Notwithstanding this, it considers that minor wording changes would be appropriate for clarity. Council also considers that clarification on the types and scale of investigation techniques that could be used when assessing potential sites would be appropriate, to ensure that the public can be confident that the type of research and scale of the research activity along with the effects associated with investigation work are only temporary.

Decision Sought:

Amend Policy 4 to read:

“ ....with Schedule I of the Act, a plan change, proposed plan or variation to ~~introduce~~ ensure that objectives, policies and, where appropriate, methods are included into policy statements and plans .....

And:

That a definition of “research-scale investigation” be included.

**Policy 5**

The Council supports Policy 5.

Decision Sought:

Retain Policy 5.

4. **Waikato District Council does not wish to be heard in support of its submission.**

Signed:   
.....  
Nath Pritchard  
Environmental Services Group Manager  
Waikato District Council

Date: 35/10/18  
.....

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Contact person: Betty Connolly, Policy Planner

Or Anne Smyth, Group Development Co-ordinator