

Submission on proposal for national policy statement for renewable electricity generation

Section 49 of the Resource Management Act 1991.

To: the Chairperson
Board of Inquiry

This is a submission on the following proposed national policy statement (the proposal):

Proposed national policy statement for renewable electricity generation.

The specific provisions of the proposal that my submission relates to are:

Entire proposal

My submission is:

- *Windflow Technology supports the proposed NPS for renewable electricity*

Windflow Technology supports the view that central government should give clear direction to local government about the treatment of renewable electricity generation (and wind power in particular) on a consistent basis throughout the country if we are to achieve the goal of 90% renewable electricity by 2025. The RMA's core principle is sustainable development and this NPS should re-emphasise that core principle by directing local government to plan for renewable electricity developments, rather than relying on the ad hoc process of resource consents for non-complying activities.

Policy 1 – Recognising the national significance of the benefits of renewable electricity generation activities.

Windflow's Recommendation:

- The NPS should list the actual national benefits of each form of renewable electricity generation, including wind power, and these national benefits should be included along with any local benefits in district and regional council plans so that these national and local benefits do not have to be debated in consent hearings.

Policy 2 – Acknowledging the practical constraints associated with the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities.

Windflow's Recommendation:

- This is too vague. Suggest NPS require district plans to recognise where a good renewable electricity generation resource exists close to existing infrastructure and make a certain amount of it a permitted or discretionary activity in that location. See also our recommendation under policy 4. It should also recognise this in relation to potential developments in the area that could result in this area no longer being able to be used for

renewable electricity. In particular if an area is identified as particularly well suited to wind power generation, do not allow houses to be built within a certain area of it.

Policy 3 – Having regard to the relative reversibility of adverse effects associated with particular generation types.

Windflow's Recommendation:

- We support the proposal that district and regional council plans should compare the relative reversibility of renewable electricity's adverse effects against non-renewable because this will recognise the additional benefits of renewable electricity, particularly with regard to carbon reduction which is the main objective. Because the adverse effects of wind power are typically minor, plans should list the adverse effects of wind power which need to be addressed in any consent applications so the list does not have to be debated in each hearing.

Policy 4 – enabling identification of renewable electricity generation possibilities

Windflow's Recommendation:

- We would recommend that to be effective the NPS should go further than simply enabling identification. It should give quantitative guidance to councils as to the quantum of renewable electricity generation they should plan for in their territories. For example we would propose a guideline to district councils that their next LTCCP should designate 1% of their territory for wind farming as a permitted activity (subject to local rules and restrictions on turbine and wind farm size, and sound level restrictions which are preferably standardised nationally eg to NZS 6808, etc). This designation should be based on mesoscale modelling of the wind resource, and give consideration to general site economics (road and power-line access) as well as the avoidance of significant adverse effects in those areas (eg landscape values of that 1% would not normally be the highest in the territory).

We recognise that the guideline will suggest to councils (not oblige them since it is only a guideline) that they should "take a stand" that planned wind power should be a permitted activity in certain areas. But this is nothing more than a statement that, properly done at an appropriate scale, the national and local benefits of wind power far outweigh its minor adverse effects. If this were done throughout New Zealand it would expedite the planned development of a resource equivalent to three times the country's present generation (note also that of the 1%, only a few % in turn is actually taken out of pastoral land use).

No other form of renewable electricity generation could provide three times our present generation from a few hundredths of 1% of our land. The case for wind farming being singled out this way is that it is the least land-intensive of the renewable electricity generation forms (by orders of magnitude vs most other forms), and it is clearly New Zealand's most promising form of new generation for the next few decades because of:

- a) fundamental economic resource reasons (NZ is a very wind country)
 - b) the small, reversible increments in which it can economically be installed
 - c) the diversity it provides which will enhance our security of supply by reducing the impact of dry year events.”
- In addition and outside of the plan change process, the NPS should require that temporary met masts to measure wind should be a permitted activity, and this could be implemented effective immediately.

Policy 5 – Supporting small and community-scale renewable electricity generation

Windflow's Recommendations:

- As stated in the Section 32 evaluation ‘Other legislation has been amended to define small-scale generation as up to 10 MW installed capacity and legislative consistency is desirable where appropriate’. We therefore recommend that the definition of small and community-scale renewable electricity generation is up to 10 MW. To address the issue of cumulative effects of small-scale projects, the definition of small-scale projects will need to have a guideline about physical separation from the nearest existing project using the same form of renewable electricity generation which we submit should be at least 3 km. For wind power to make its maximum contribution to New Zealand's future, some areas will inevitably have much more than 10 MW installed. This should be planned, rather than happen by a process of case-by-case project consenting with its associated issues about unplanned cumulative effects. See also our recommendation on Policy 4 which, if adopted, would logically lead to this policy 5 applying to additional areas outside the main areas in which wind power is permitted without the 10 MW limit of project size. The commercial viability of small projects up to 10 MW would be helped by making the resource consent process less onerous and more certain for smaller projects by the proposed required plan changes or variations to better enable these smaller projects.

I wish to be heard in support of my submission.

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Signature of submitter

(or signature of person authorised to sign)

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Date 29 October 2008

(A signature is not required if you make your submission by electronic means.)

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