

31 October 2008

The Board of Enquiry
C/o P.O. Box 10362
Wellington 6143

**Submission on Proposed National Policy Statement
for Renewable Electricity Generation.**

This is a submission on the proposed National Policy Statement (NPS) for renewable electricity generation that was publicly notified on 6 September 2008. Thank you for the opportunity to submit. This submission is prepared as a Wanganui District Council officer submission only.

The objective to reduce New Zealand's greenhouse gas emissions in the electricity sector through pursuing renewable based electricity generation is commended. It is useful to have a goal – in this case being 90 per cent electricity generation from renewable by 2025.

The following general points are made:

- The provision of non-statutory guidance would, in our view, be a better option to achieve the identified objectives. Non-statutory guidance, in combination with the existing changes to section 7 of the RMA 1991 would be sufficient to guide decision makers. Most local authorities will soon be working on their second generation plans, meaning that changes to the Act, making provision for renewable electricity generation can be included as part of the plan making process. As identified in the Section 32 report, case law will also guide decision makers.
- The importance of national electricity supply coupled with supporting small and community-scale renewable electricity generation appears to be somewhat contradictory in nature. It is not clear how applications for small and community scale renewable electricity generation will sit in comparison to those of national importance. Is the primary purpose of the NPS to enable development of national level renewable electricity generation or to encourage small community scale renewable electricity generation development?
- The potential cost to local authorities in giving effect to the NPS, are significant. The Section 32 report has identified the potential monetary costs that a TA will incur, however no assessment has been made of the potential environmental costs that local communities may face. Policies 2 and 3 suggest that provisions in plans, and the decisions made on applications under those plans, will allow more than minor local adverse effects, in the greater interest of the Country.

The following specific points are made:

- Although the intent of the NPS is to provide increased certainty when considering applications for renewable electricity generation, there is no clear guidance given on how to balance national benefits against local effects. This lack of certainty for weighing national and local priorities will result in varied assessments for renewable electricity generation development depending on the TLA involved, and would therefore not achieve the desired certainty.
- Requiring decision makers to consider the practical constraints that may limit the ability of developers to avoid, remedy or mitigate the adverse effects of renewable electricity generation activities assumes unreasonable decision are being made on existing applications. This objective is not required as current decision making processes would consider constraints on developers, however, not with a weight that would result in significant adverse effects on the environment. If the intention is to allow local adverse effects to the national benefit, then the NPS should come out and say it.
- Policy 3, requiring decision makers to have particular regard to the relative degree of reversibility of the adverse environmental effects associated with proposed generation technologies, does not provide any guidance relative to the varying timeframes that may be involved. It could prove difficult for decision makers to weigh effects generated over the application timeframe with the degree of reversibility.

I do not wish to be heard in support of my submission, however if others make a similar submission, I will consider presenting a joint case with them at a hearing.

If you have any queries about this submission please contact me at the Wanganui District Council on (06) 349 0543 extn 8069.

Yours faithfully

Shane McGhie
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