



THE WEST COAST
REGIONAL COUNCIL

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The Board of Inquiry
C/o PO Box 10362
WELLINGTON

Our Reference: 06-230

Enquiries to: Simon Moran

Dear Sir/Madam

**SUBMISSION ON PROPOSED NPS FOR RENEWABLE ELECTRICITY
GENERATION**

Thank you for the opportunity to submit on the Proposed NPS for Renewable Electricity Generation. Attached is the West Coast Regional Council's submission.

Yours faithfully

Simon Moran
Planning and Environmental Information Manager

Submission on the Proposed National Policy Statement for Renewable Electricity
Generation

The West Coast Regional Council is disappointed that the Proposed National Policy Statement for Renewable Electricity Generation (NPS) as currently worded has not provided the greater certainty that was its stated aim in its Preamble:

"A nationally consistent approach to balancing the competing values associated with the development of New Zealand's renewable energy resources will provide greater certainty to decision-makers, applicants, and the wider community."

This NPS should be enabling and state clearly that renewable electricity generation **is appropriate development** except in certain circumstances. Such a statement would provide very clear national policy direction.

The Objective to have 90% of electricity generated by renewable sources in 2025 based on delivered electricity in an average hydrological year appears to be at odds with Policy 3. Large dams can provide the scale necessary to generate large amounts of energy at competitive prices yet by their nature their effects have a lower degree of reversibility and this weighs against them under this policy. Given that the climate is expected to change considerably in the next 50-100 years it seems rather short sighted to be ruling out energy options that have a relatively long lead in time to develop.

Policy 1 identifies that all renewable electricity generation activities are of national significance and that is supported.

Policy 2 does little more than confirm current resource consent assessment practice and does not provide national direction.

Policy 3 is not supported for the reasons stated above.

Policy 4 is not supported as although Policy Statements and Plans need to give effect to an NPS it should not be timeframed in the legislation as this creates unnecessary cost for little benefit. The NPS is there and it will have, and be given, greater weight in an officers report than pre-existing policies in an RPS or Plan, therefore these planning documents can be amended at their next review. To impose unnecessary costs to go through plan changes every time a new NPS or NES becomes operative is inefficient and a waste of ratepayers money.

Policy 5 is not supported for similar reasons to Policy 4. Requiring plan changes in an NPS or NES should not be a decision taken lightly as there are significant cost implications for councils and these have to be funded by the ratepayer.

Decisions Requested

- This NPS should be enabling and state clearly that renewable electricity generation **is appropriate development** except in certain circumstances. Such a statement would provide very clear national policy direction.
- Retain Policy 1 as currently worded.

- Delete Policy 2 as it does not add any value to a NPS.
- Delete Policy 3.
- Amend Policy 4 so that it becomes a statement such as:
"it is appropriate that the following are encouraged:
 - *the identification and assessment by generators of potential sites and energy sources for renewable electricity generation.*
 - *research-scale investigation into emerging renewable electricity generation technologies and methods."*

If the above decision requested is rejected then delete any timeframe from the policy.

- Amend Policy 5 so that it becomes a statement such as:
"Activities associated with the development and operation of small and community-scale distributed renewable electricity generation are to be encouraged."

If the above decision requested is rejected then delete any timeframe from the policy.