

## **SUBMISSION**

[Form 3]

### **Proposed National Policy Statement for Renewable Electricity Generation**

**TO: The Chairperson  
Board of Inquiry**

This is a submission on the proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

**The specific provisions of the proposal that Cardno TCB Ltd's submission relates to are:**

The proposed NPS in entirety.

**Cardno TCB Ltd's submission is:**

#### Overview

Cardno TCB Ltd generally supports the proposed National Policy Statement (NPS) for Renewable Electricity Generation.

The proposed NPS will no doubt provide the opportunity for national consistency for the assessment of renewable electricity projects during the resource consent processes. The proposed NPS appears to be particularly aimed at supporting section 7(j) of the RMA.

However, it would be of concern if the proposed NPS was used to elevate the weighting of section 7(j) over the other matters in section 7. This raises the question as to whether further National Policy Statements should be promulgated to provide similar national guidance on the other matters in section 7 or more particularly those matters of national importance under section 6 (for which there is only the mandatory New Zealand Coastal Policy Statement).

## Specific Comments

### *Policy 1:*

Cardno TCB Ltd generally supports Policy 1.

### *Policy 2:*

An NPS should not infer that any potential measures to avoid, remedy or mitigate adverse effects need not be provided by a proposal simply due to the likelihood of there being constraints to achieving such measures based on the type of proposal or location of the proposal.

That is, if a particular type of project is selected in a marginal location (i.e. marginal in terms of the project's ability to avoid, remedy or mitigate adverse effects), then the proposed NPS should not provide an excuse to do away with the measures just because they might be difficult or costly to implement. The need for mitigation measures etc. need to be considered in the usual way and included in the qualitative judgement when weighing up Part II matters.

Consequently, Cardno TCB Ltd considers that the first bullet point item of Policy 2 should be deleted or substantially amended to provide better clarity of its intention.

### *Policy 3:*

Cardno TCB Ltd supports Policy 3. However, the wording of the policy needs to be improved. Particularly, the phrase "... *the relative degree of reversibility of the adverse environmental effects ...*" is a serious cause of confusion.

The regulatory impact statement refers to the reversibility of the generation technology not of the adverse environmental effects. Therefore, the policy needs to be amended to better reflect the policy's intention to consider reversibility / removal / reuse etc. of the generation activity itself and associated infrastructure.

### *Policy 4:*

Cardno TCB Ltd supports Policy 4.

### *Policy 5:*

Cardno TCB Ltd supports Policy 5. However, the wording of the policy needs to be improved. Particularly, the use of the word *distributed* in the phrase "... *the development and operation of small and community-scale distributed renewable electricity generation.*" is confusing.

The confusion occurs as to whether the term *distributed* means:

- 1) the electricity generation facilities themselves are distributed (i.e. spaced out) within the local community, city or district; or
- 2) whether it means that the energy that is generated is distributed (i.e. delivered / conveyed) to a number of recipients.

*Definitions / Interpretation:*

As per our comments on Policy 5 above, the term *distributed* is not explained and is used within the definition of other terms.

**Cardno TCB Ltd seeks the following changes to the proposal:**

*Policy 2:*

That the first bullet point item of Policy 2 should be deleted or substantially amended to provide better clarity of its intention.

*Policy 3:*

That the policy is amended to better reflect the policy's intention to consider reversibility / removal / reuse etc. of the generation facility itself and the associated infrastructure.

*Policy 5:*

That the policy is amended to better reflect the policy's intention to support small and community-scale renewable electricity generation projects by removing the term "*distributed*".

*Definitions / Interpretation:*

That the term "*distributed*" is removed.

**Cardno TCB Ltd does not wish to be heard in support of our submission.**



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Signature of submitter (or person authorised to sign on behalf of submitter)

31 October 2008

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Date

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