



Whangarei District Council Submission to the Ministry for the Environment re "Proposed National Policy Statement on Renewable Electricity Generation"

Introduction

Thank you for the opportunity to make a submission on the Proposed National Policy Statement on Renewable Energy Generation. We are making this submission from the perspective of a medium sized district council, its associated limitations on staff resources, and strong rural component to its local economy. We suggest that most large scale renewable energy generation projects are likely to occur in such types of districts, most of which will have similar resourcing issues. We also suggest that the National Policy Statement will have a disproportionate impact on planning tasks already undertaken by such councils when compared with better resource localities, and that any intended support packages should be directed towards district councils with strong renewable resources.

Present Provisions

Our District Plan does not contain any reference to renewable energy generation.

Renewable Energy Generation Potential

A recent report "Renewable Energy Generation: Northland Region", written by SKM Consulting and published in 2006, evaluated the overall renewable energy generation potential of Northland. In essence some good renewable resource can be found in the region, but feasibility differs from district to district. Reasonably large wind and marine generation potential exists on the west coast of Northland, within the Kaipara and Far North District Councils respectively, and we acknowledge that the development of these resources will probably be necessary for the security of electricity supply in Northland.

However, it is clear from this document that Whangarei District is not likely to see much in the way of large scale wind, hydro, or marine generation activity. We believe that most of the impact from this National Policy Statement will be felt in terms of some small/micro hydro generation and solar, and perhaps some biomass related activity. Some impacts may be felt in terms of cross-border activities when energy may be transmitted from the source to where demand is needed, but in general terms, this electricity supply is expected to be carried by the National Grid Network rather than any purpose built local electricity distribution network.

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Biomass potential is relatively low in terms of dedicated future energy crops when compared with other regions. However, there appears to be significant potential for biomass sourced from forestry waste. This potential is dependant upon second generation biofuel production technology, and questions remain as to whether this method of generation becomes financially viable when compared with proven technologies such as wind or solar. If such biomass generative plants were developed locally, we would expect them to be 'industrial in scale' rather than 'community scale'. In addition, we would expect them to be primarily for the production of bioethanol or, dependant on the waste source crop, biodiesel, and therefore more likely to be used as fuel rather than electricity generation. Therefore our most likely source of renewable energy potential will not sit comfortably into the confines of this National Policy Statement which is concerned with renewable *electricity* generation. We do acknowledge that electricity may be produced from biogas and associated sources, and the development of new landfill facility in this district may benefit from some parts of this National Policy Statement.

Generally, it is believed that the overall renewable electricity generation potential for this district is low in terms of short and medium term planning horizons. Bearing this in mind, the management of the effects of renewable energy generation is likely to be relatively unimportant when compared with other more pressing issues for the District – especially in terms of coastal development, aquaculture, growth management, freshwater policy and issues of importance to local Iwi.

Whilst we acknowledge the importance of renewable energy generation to help meet New Zealand's targets, the blanket approach offered in Policies 4 and 5, in which plan changes are required for the identification of renewable electricity generation possibilities and supporting small and community-scale electricity generation by the 13th of March 2012, seems excessive.

In terms of Policy 1 and Policy 2, we see the merits behind using these policies as aids to local resource consent decision-making and appreciate the method in which they do not require plan changes for implementation. Similarly, Policy 3 also appears to be primarily targeted at decision-makers and also doesn't require a plan change at the local level. However, we do find issue with Policy 4 as it presents something of a new direction for resource management by using 'reversibility' as an organising principle. To implement this policy, we would expect that much in the way of guidance material needs to be prepared, and updated regularly due to technological changes, as this arena is likely to be fraught with debate.

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Relief Sought:

Overall, Whangarei District Council does not support the proposed National Policy Statement: Renewable Electricity Generation, and questions the value the statement will have as it is presently written. However, we do recognise that Renewable Electricity Generation is a significant issue in New Zealand and there is a desire by central government to promote development of this sector.

Assuming that the decision is made to proceed with the NPS: Renewable Electricity Generation, we request the following amendments (or similar):

Policy 4: Enabling identification of renewable electricity generation possibilities

By 13 March 2012, local authorities ***with significant renewable electricity generation potential*** are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to enable activities associated with:

- i) the identification and assessment by generators of potential sites and energy sources for renewable electricity generation
- ii) research-scale investigation into emerging renewable electricity generation technologies and methods.

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

By 13 March 2012, local authorities ***with demonstrable community renewable electricity generation needs*** are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to enable activities associated with the development and operation of small and community-scale distributed renewable electricity generation.

Finally, we would like to reiterate our concern over the amount of work needed to both assess and submit on the many National Policy Statements and National Environmental Standards being prepared and notified at present. To do them justice requires much effort and resourcing is often a key issue at District Councils.

We do not wish to be heard in support of this submission.

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