

Dear Josie,

At the Dunedin hearing on the NPS on Renewable Energy on 11<sup>th</sup> June I was asked by the Chair of your Board of Inquiry to consider and respond at a later date on two points:

First, had we considered how the NPS on Freshwater relates to the NPS on Renewable Energy as far as 'structures' were concerned? The references given for the NPS on Freshwater were 'GA' or '1GA'. I assume the provisions of interest were Policy 1(g) or Policy 1 (j).

Policy 1 (g) seems to address only existing uses of water in times of low flow and would need to more explicitly cover the issue to be helpful

"NPS on Freshwater  
Policy 1

(g) Guide and direct regional plans (including considerations for the determination of resource consent applications) to restrict existing takes, uses, damming and diversion of fresh water in order to sustain Notable Values and non-consumptive Tangata Whenua Values and Interests in times of low flow;"

Policy 1 (j) on the other hand does appear to offer an opportunity to help shape district plan policies on structures in order to control adverse effects of land use development. Those plan policies could lay out a hierarchy of reversibility for structures and help favourable consideration of the more reversible alternatives and inhibit the less reversible ones, particularly where it comes to electricity production.

NPS on Freshwater

Policy 1

(j) Guide and direct regional and district plans (including considerations for the determination of resource consent applications and notices of requirement) to ensure integrated management of the effects of Land-use Development –

i. by encouraging co-ordination and sequencing of infrastructure for supply, storage and distribution of fresh water; and

ii. by controlling adverse effects (including associated discharges of contaminants) on the quality and available quantity of Freshwater Resources.

It would be helpful to have some linkage or dovetailing of the two NPSs in the area of structures

Second, the upper limit for small distributed community electricity schemes should remain where it is at present which I understand to be 4 MW. Increasing it to 10MW would be a concern because of the relatively large impact on streams and small rivers. From an environmental point of view it is better to consolidate power supply through the national grid and improve that structurally in order to make security of

supply and efficiency gains (eg developments close to end users) rather than encourage additional developments which don't feed into the grid.

Please can you pass these additional comments on the Board

Yours sincerely

Niall Watson  
Chief Executive  
Otago Fish and Game Council