



Porirua City Council

30 June 2009

Submission to Board of Inquiry

for

Proposed National Policy Statement

for

Renewable Electricity Generation

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Porirua City Council's submission

- Overall support for the Proposed NPS from Porirua City Council, with some reservations
 - Policy 3 as proposed, puts undue focus on reversibility of renewable electricity generation technologies – this needs changing.
 - Policies 4 and 5 as proposed, impose an unnecessarily arbitrary burden on local and regional authorities, for questionable benefits, and need changing.
 - No guidance on how to prioritise the requirement for having particular regard to "the benefits to be derived from the use and development of renewable energy" in conjunction with the 'Other Matters' in section 7 (or even with other matters in Part II) of the Act – which reduces the effectiveness and relevance of the Proposed NPS.

Policy 3

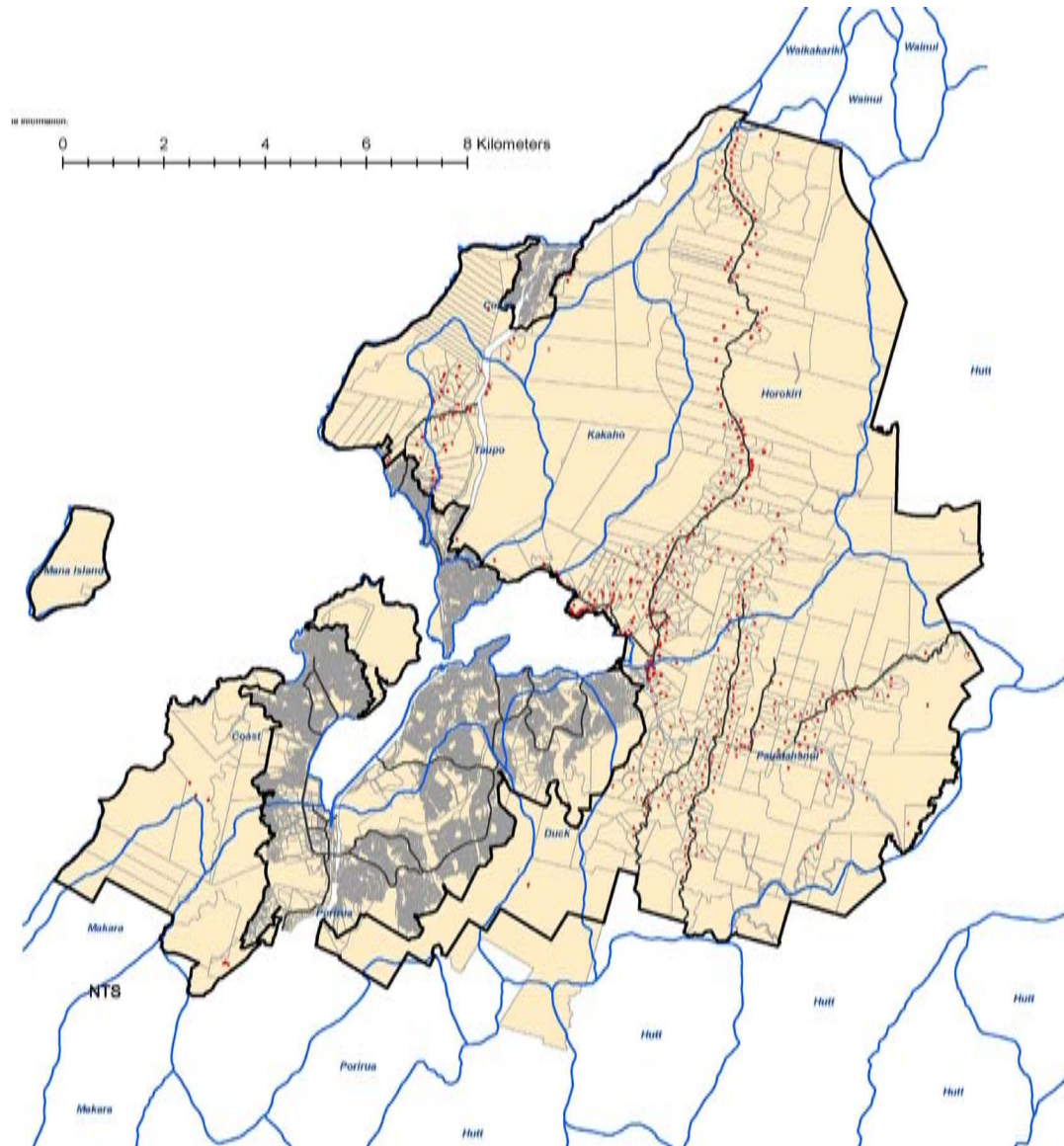
- Criterion of ‘reversibility’ could be read to overstates this aspect as a matter of consideration.
- Therefore either the criterion should be deleted, or other criteria should be added to balance consideration of proposals, e.g.;
 - The extent to which any proposed renewable electricity generation facility has adverse effects which cannot be avoided, remedied or mitigated.
 - The extent to which any proposed renewable electricity generation facility constrains and/or inhibits the efficient use and development of finite natural and physical resources for other activities.

Policies 4 and 5

- Requirement to notify Proposed Plan Changes by 13 March 2012 is too inflexible
- PCC already has a Proposed Plan Change addressing relevant renewable electricity generation issues in Porirua, and PCC, and other Councils in a similar position, should be excused from having to notify further Proposed Plan Changes.

Policy 5

- Policy 5's definition of "small and community scale distributed renewable electricity generation" incorporating installed capacity of less than 4 megawatts (MW) is quite arbitrary, and has no relation to potential cumulative effects.
- A 4MW wind turbine is amongst the largest type of wind turbine currently available. One of these on every property in Porirua under the guise of 'small and community-scale distributed renewable electricity', would have potentially enormous adverse cumulative effects.
- Proposals for distributed renewable electricity generation are better handled on a case-by case basis.



Legend

- Rural Zone
- Catchment Areas
- Rural Dwellings
- Main Roads
- Parcel_region

Number of Properties in the Rural Zone = 608
 Number of dwellings (at least) = 401
 Based on data current as at January 2008

PORIRUA CITY

DWELLINGS IN THE RURAL ZONE

Balancing Part II matters

- A hierarchy of priorities to consider under Part II – Renewable energy use and development is but one matter in Section 7
- How should tensions between 'competing' Section 7 matters be reconciled?
- Local context is important in the determination, however National guidance would help.

Balancing Part II matters

- Define ‘sustainable renewable electricity development’ with a balanced mix of criteria e.g.:
 - The extent to which any proposed renewable electricity generation facility has adverse effects which cannot be avoided, remedied or mitigated; and
 - The extent to which any proposed renewable electricity generation facility constrains and/or inhibits the efficient use and development of finite natural and physical resources for other activities; and
 - The relative degree of reversibility of the adverse effects on the environment associated with proposed generation technologies.