

Section 6: National Policy Statements and National Environmental Standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

- **National Policy Statement for Indigenous Biodiversity 2023 (NPSIB):**

The NPSIB came into effect on 4 August 2023. At clause 1.3(3) It states:

Nothing in this National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities.

The relevant definitions of the NPSIB are listed below.

renewable electricity generation assets means the physical components required for renewable electricity generation, along with the assets and infrastructure (such as cabling, access roads, and tracks) required to store the generated electricity and connect it to transmission or distribution networks or direct to end users

electricity transmission network assets means the physical components of the electricity transmission network, along with all access roads and tracks required to operate and maintain those assets

The application seeks development, maintenance and operation of a renewable electricity generation asset.

The NPSIB is not a relevant consideration and does not apply to the JWF development. The NPSIB is disapplied and the project is not assessed against it.

- **National Policy Statement for Highly Productive Land 2022 (NPSHPL):**

This NPS came into effect after the Southland District Plan and Southland Regional Policy Statement became operative in October 2022. The JWF site is in a qualifying zone being identified as part of the Rural Zone under the SDP. However, the NPS-HPL is not considered of direct relevance to the proposal because the site is a combination of land use capability classes 4 and 6 as identified on the Manaaki Whenua Research website.

We note that, the JWF is consistent with the NPS-HPL definition of specified infrastructure and as such would be exempt even if the site were identified as having highly productive soils. The NPS-HPL is not therefore relevant to the JWF proposal and is not considered further.

- **National Policy Statement for Freshwater Management 2020 (NPSFM):**

There are no water bodies or freshwater ecosystems in the area of proposed works and no water body will be directly or indirectly impacted by the proposal (river, lake, stream, pond, wetland, or aquifer) at the site. The NPS-FM is not relevant to the proposed JWF and is not assessed further.

- **National Policy Statement on Renewable Electricity Generation 2011 (NPSREG):**

The NPS recognises the importance of renewable energy and aims to help New Zealand achieve Central Government's target of (what was then) 90 per cent of electricity from renewable sources by 2025.

A brief policy assessment is provided below:

A. Recognising the benefits of renewable electricity generation activities
POLICY A

Decision-makers shall recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. These benefits include, but are not limited to:

- (a) maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;
- (b) maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation;
- (c) using renewable natural resources rather than finite resources;
- (d) the reversibility of the adverse effects on the environment of some renewable electricity generation technologies;
- (e) avoiding reliance on imported fuels for the purposes of generating electricity

- The JWF proposal will have a number of positive renewable electricity generation effects that align to the matters identified in this policy in (a) through to (e) and the proposed activity is consistent with this policy.

B. Acknowledging the practical implications of achieving New Zealand's target for electricity generation from renewable resources

POLICY B

Decision-makers shall have particular regard to the following matters:

- (a) maintenance of the generation output of existing renewable electricity generation activities can require protection of the assets, operational capacity and continued availability of the renewable energy resource; and
- (b) even minor reductions in the generation output of existing renewable electricity generation activities can cumulatively have significant adverse effects on national, regional and local renewable electricity generation output; and
- (c) meeting or exceeding the New Zealand Government's national target for the generation of electricity from renewable resources will require the significant development of renewable electricity generation activities.

- The JWF proposal will contribute to achievement of the New Zealand Government's national target for the generation of electricity from renewable resources and is consistent with this policy.

C. Acknowledging the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities

POLICY C1

Decision-makers shall have particular regard to the following matters:

- (a) the need to locate the renewable electricity generation activity where the renewable energy resource is available;
- (b) logistical or technical practicalities associated with developing, upgrading, operating or maintaining the renewable electricity generation activity;
- (c) the location of existing structures and infrastructure including, but not limited to, roads, navigation and telecommunication structures and facilities, the distribution network and the national grid in relation to the renewable electricity generation activity, and the need to connect renewable electricity generation activity to the national grid;
- (d) designing measures which allow operational requirements to complement and provide for mitigation opportunities; and
- (e) adaptive management measures.

- The JWF site has been identified as having high wind energy resource (a) and is located close to existing electricity distribution lines with capacity to service the wind farm and connect it to the national grid (b) and (c). The proposal is also considered consistent with (d) and (e) of this policy.

POLICY C2

When considering any residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected.

- The applicant is open to consideration of options for environmental compensation initiatives including measures or compensation which will benefit the local environment and community affected by the proposal.

G. Enabling identification of renewable electricity generation possibilities

POLICY G

Regional policy statements and regional and district plans shall include objectives, policies, and methods (including rules within plans) to provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators.

- The JWF proposal accords with this policy.

- **National Policy on Electricity Transmission 2008 (NPSET)**

The proposed wind farm will connect to the electricity distribution network, therefore the NPSET is not directly relevant to this proposal.

- **National Environmental Standards:**

None of the National Environmental Standards are engaged by this proposal.