

SUBMISSION ON

Consenting improvements for renewable electricity generation and transmission

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To: Ministry of Business, Innovation and Employment

Name of Submitter: Horticulture New Zealand

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Our submission

Horticulture New Zealand (HortNZ) thanks the Ministry of Business, Innovation and Employment (MBIE) for the opportunity to submit on consenting improvements for renewable electricity generation and transmission and welcomes any opportunity to continue to work with MBIE and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

I have read and acknowledge the Privacy Statement.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Submission

1. Integrated Planning Direction

It is critical that national planning direction is integrated, so that policy statements are consistent and work toward common goals. When national policies are aligned, they will reinforce and amplify each other's impacts. By considering the interconnections and interdependencies among various sectors, policies can be designed to generate positive spill over effects and avoid unintended negative consequences. This holistic approach helps maximize the overall effectiveness of policies.

Integrated policies enable better resource allocation, preventing redundant efforts or inefficient use of Government time and money resolving contradictory decisions. Consistent national direction also fosters more confidence in the long-term stability of the policy regime.

1.1. National Policy Statement for Highly Productive Land

As such, the Proposed National Policy Statement for Electricity Transmission (NPS-ET) should align with the National Policy Statement for Highly Productive Land (NPS-HPL).

Section 3.9 of the NPS-HPL states that "use or development of highly productive land is inappropriate" with limited exceptions. The "maintenance, operation, upgrade, or expansion of specified infrastructure", including electricity transmission, is permissible only when "there is a functional or operational need for the use or development to be on highly productive land."¹ The table below specifies how this policy can be applied to the NPS-ET.

¹ National Policy Statement for Highly Productive Land 2022. Accessed online 30/05/23.
<https://environment.govt.nz/publications/national-policy-statement-for-highly-productive-land/>

Submission on Proposed National Policy Statement for Electricity Transmission (2023)

Without limiting the generality of the above, HortNZ seeks the following decisions on the Proposed National Policy Statement for Electricity Transmission (2023), as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/oppose	Reason	Decision sought
Policy 2	Support in part.	Consideration of the NPS-HPL.	<p>Planning decisions:</p> <p>(a) recognise and provide for the national significance of the electricity transmission network; and</p> <p>(b) enable ETN activities to occur in a timely and efficient way <u>on land that is not highly productive</u>; and</p> <p><u>(bi) enable ETN activities to occur in a timely and efficient way on highly productive land only when there is a functional or operational need for the use or development to be on the highly productive land</u>; and</p> <p>(c) recognise and provide for the operational and functional needs of the electricity transmission network.</p>
Policy 3	Support in part.	Consideration of the NPS-HPL.	<p><u>(a) Minor ETN activities are enabled on land that is not highly productive; and</u></p> <p><u>(b) Minor ETN activities are enabled on highly productive land only when there is a functional or operational need for the use or development to be on the highly productive land.</u></p>

Policy X	New	The provisions for significant environmental values should be duplicated for highly productive land in alignment with the NPS-HPL.	<u>It is recognised that ETN activities may need to take place in areas with highly productive land and, where adverse effects remain after applying the effects management hierarchy, ETN activities are enabled if there is a functional or operational need for the ETN activities to be on the highly productive land, and the national significance and benefits of the ETN activities outweigh those remaining adverse effects.</u>
3.X Areas with highly productive land	New	The provisions for significant environmental values should be duplicated for highly productive land in alignment with the NPS-HPL.	<p><u>(1) Every regional council must include the following policy (or words to the same effect) in its regional policy statement and regional plan, and every territorial authority must include it in its district plan:</u></p> <p><u>“(1) Allow ETN activities in areas with highly productive land only if:</u></p> <p><u>(a) there is an operational or functional need for the ETN assets to be located in that area; and</u></p> <p><u>(b) the ETN activities are nationally or regionally significant; and</u></p> <p><u>(c) the effects management hierarchy is applied.</u></p> <p><u>“(2) The effects management hierarchy is as follows:</u></p> <p><u>(a) adverse effects are avoided where practicable; then</u></p> <p><u>(b) where adverse effects cannot be avoided, they are minimised where practicable; then</u></p> <p><u>(c) where adverse effects cannot be minimised, they are remedied where practicable; then</u></p>

(d) where more than minor residual adverse effects cannot be avoided, minimised, or remedied, offsetting is provided where practicable then

(e) if offsetting of more than minor adverse effects is not practicable, compensation is provided; then

(f) if compensation is not appropriate to address any residual adverse effects:

(i) the ETN activities must be avoided if the residual adverse effects are significant; but

(ii) if the residual adverse effects are not significant, the ETN activities must be enabled if the national significance and benefits of the ETN activities outweigh the residual adverse effects.”

“(3) When considering offsetting and compensation, have regard to any relevant principles relating to offsetting and compensation set out in any other National Policy Statement or, if there are no relevant principles in a National Policy Statement, any other relevant nationally or internationally recognised principles.”