

Form 3
**Submission on proposal for national policy statement for renewable
electricity generation**

In accordance with section 49 of the Resource Management Act 1991

To The Chairperson
Board of Inquiry

From Palmerston North City Council

This is a submission on the proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

Introduction

Palmerston North City Council's primary interest in the proposal is the effect the proposal will have on the assessment of resource consent applications for wind-farms and the preparation of local policy to manage the development of wind-farms within the City.

Palmerston North City Council (PNCC) recently resolved to prepare a report designed to lead to a policy for the City in relation to the siting and operation of wind farms that may be either fully or at least partly located within the City boundaries. The proposal is therefore of interest to PNCC.

As you may be aware, Palmerston North City and its neighbouring Districts (Horowhenua and Tararua) have been at the forefront of the wind energy debate for the last decade with 5 wind-farms totalling 366 turbines consented in the local area. The Tararua ranges continue to be placed under significant development pressure with further wind-farms proposed.

The most recent application, the Motorimu wind-farm was recently approved by the Environment Court. 127 turbines were sought. 75 Turbines were approved by the Commissioners appointed by the Council to hear the application with a further 5 turbines being approved by the Environment Court. Mighty River Power has recently lodged a resource consent application with Council to construct 131 turbines, the majority of which are located within Palmerston North City.

Specific Provisions

The specific provisions of the proposal that the Palmerston North City Council submission relates to are:

- The Preamble
- Matter of National Significance
- The Objective
- Policy 1
- Policy 2
- Policy 3
- Policy 4
- Policy 5

The PNCC submission is:

The Preamble

PNCC oppose the preamble of the proposal.

Reasons:

The preamble identifies the NZ Energy Strategy as a key document, notes the contribution of renewable energy towards addressing the effects of climate change and, importantly, notes that the adverse effects of the development renewable energy sources manifest locally and positive effects manifest nationally (and globally).

While the preamble provides a useful summary of the background matters relevant to the sustainable management of renewable electricity generation, the proposal does not, as suggested, adopt a nationally consistent approach to *balancing* the competing values associated with the development of New Zealand's renewable energy resources.

The proposal is based entirely around the promotion of renewable electricity generation and does little to balance competing values such as effects on landscape features, rural amenity, including noise, and significant indigenous vegetation. The proposal only provides greater certainty around the weight to be given to renewable energy proposals. While this will assist the process of assessing applications and developing policy it does not, alone, balance the competing values associated with the development of renewable electricity generation (as suggested in the preamble). PNCC urges cumulative effects of multiple consents in one locality be dealt with in the National Policy Statement.

The benefits of renewable electricity generation are evident and supported by PNCC. It is the potential, cumulative and actual effects of the development of renewable electricity generation that causes the most debate at the local level.

The preamble should be more direct with regards to its intention to give effect to the NZ Energy Strategy.

Matter of National Significance

PNCC do not support or oppose the identification of the need to develop, upgrade, maintain and operate renewable electricity generation activities throughout New Zealand as a matter of national significance.

Reasons:

PNCC has no option but to take a neutral stance with regards to the identification of renewable electricity generation as a matter of national significance given the content and goals of the NZ Energy Strategy.

The Objective

PNCC do not support or oppose the objective of the proposal.

Reasons:

PNCC recognise the objective is consistent with the NZ Energy Strategy. PNCC appreciate the benefits to be derived from the use and development of renewable energy and the contribution of renewable electricity generation towards addressing the effects of climate change.

The Objective should specifically refer to the intention of the proposal to give effect to the NZ Energy Strategy.

Policy 1

PNCC does not support or oppose Policy 1.

Reasons:

Policy 1 essentially supports and reinforces section 7(j) of the RMA and the NZ Energy Strategy. As mentioned previously, the benefits of renewable electricity generation are evident and supported by PNCC.

The reasons for not elevating section 7(j) of the RMA to a matter of national importance within the s32 assessment are noted and accepted.

Policy 2

PNCC does not support or oppose Policy 2.

Reasons:

Such constraints are already taken into account during the assessment of resource consent applications for renewable electricity generation activities. They would also be taken into account during the development of local policy prepared to manage the potential effects of the development of renewable electricity generation. Policy 2 purely reinforces that the constraints listed will be taken into account at the local level.

It is acknowledged that Policy 2 will also ensure consistency on this matter across the country.

Policy 3

PNCC does not support or oppose Policy 3.

Reasons:

The relative reversibility of adverse effects associated with particular generation types is already taken into account during the assessment of resource consent applications for renewable electricity generation activities, in particular wind farms. Such matters would also be taken into account during the development of local policy prepared to manage the potential effects of the development of renewable electricity generation. Policy 3 purely reinforces that such matters will be taken into account.

It is acknowledged that Policy 3 will ensure consistency on this matter across the country.

Policy 4

PNCC does not support or oppose Policy 4.

Reasons:

The main renewable energy source in Palmerston North City is wind. Activities associated with the identification and assessment by generators of potential sites and energy sources for renewable electricity generation are therefore wind masts.

Wind masts default to Discretionary (Restricted) Activities within the Rural Zone of the Palmerston North City District Plan. Resource consent applications for wind masts within the City have been processed on a non-notified basis and have all, to date, been approved by Council without further formality. The only realistic option for Palmerston North City is therefore to investigate whether or not it should specifically list wind mast as a permitted, controlled or restricted discretionary activity within the Rural Zone of the District Plan. Possible performance conditions would also need to be considered. This would not be a major task and could be accommodated as part of the current District Plan Review.

Specifically providing for research scale investigation into emerging renewable electricity generation technologies and methods would appear somewhat difficult without being able to predict the future and the likely effects of unknown activities. The only foreseeable opportunity within Palmerston North City is domestic scale wind turbines which are covered by Policy 5 of the proposal.

Domestic scale solar energy is not currently restricted in any manner within the District Plan.

Policy 5

PNCC does not support or oppose Policy 5.

Reasons:

The main challenge with this Policy is it is difficult to predetermine the potential effects of such activities and the likely response from local communities. This means small scale and community scale renewable electricity generation activities would generally need to be listed as Unrestricted Discretionary activities within a District Plan.

Small scale and community scale renewable energy may well be in a similar position to that of large scale wind-farms ten years ago. Council was aware there may well be future applications, but was unsure of the extent, location, design, technology and effects of such activities.

At present small and community scale wind farms would be assessed as an unrestricted discretionary activity under the Palmerston North City District Plan. If an applicant had the written approval of their neighbours then Council would look favourably on such applications. Council would still be required to assess noise and other potential amenity and visual effects.

The recently notified One Plan includes a similar regional policy. Council submitted in opposition to the Policy for the reasons described above.

To date there has been no interest in Palmerston North about small or community-scale renewable electricity generation. Council is also unaware of any guidance on what these might look like, how they may operate, how big they may be, how many may be required or what noise levels they create. Drafting local policy that enables these activities to occur will therefore be very difficult, other than providing for small or community-scale renewable electricity generation activities as Unrestricted Discretionary activities.

PNCC seek the following changes to the proposal:

The Preamble

The preamble should be amended to describe that the proposal only provides greater certainty around the weight to be given to renewable energy proposals. It does not assist with balancing the competing values associated with the development of renewable electricity generation.

The preamble should be more direct with regards to its intention to give effect to the NZ Energy Strategy.

The Objective

The Objective should specifically refer to the intention of the proposal to give effect to the NZ Energy Strategy.

Policy 5

A note should be added to Policy 5 noting that it is very difficult to enable or provide for small and community-scale renewable electricity generation activities within local planning documents without having a fundamental understanding of how the activities may operate and what effects they may have on the surrounding environment.

PNCC wish to be heard in support of my submission.

* If others make a similar submission, PNCC will consider presenting a joint case with them at a hearing.



Patrick Clifford
Chief Executive



Jono Naylor
Mayor

Signature of submitter (or person authorised to sign on behalf of submitter)

30 October 2008

Date

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