

# Auckland Regional Public Health Service

Rātonga Hauora ā Iwī o Tamaki Makaurau



Working with the people of Auckland, Counties Manukau and Waitemata

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31<sup>st</sup> October 2008

To the Chairperson  
Board of Inquiry

## **Submission on proposal for national policy statement for renewable electricity generation**

*In accordance with section 49 of the Resource Management Act 1991*

1. Auckland Regional Public Health Service (ARPHS, the Service) provides public health services for the three district health boards in the Auckland Region (Auckland, Counties Manukau and Waitemata District Health Boards), with the primary governance mechanism for ARPHS resting with Auckland District Health Board.
2. This is a submission on the proposed national policy statement for renewable electricity generation that was publicly notified on 6 September 2008. This submission represents the views of the Service and does not necessarily represent the views of the three District Health Boards.
3. ARPHS understands that all submissions will be available under the Official Information Act 1982, except if grounds set out under the Act apply.
4. The primary contact point for this submission is:

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5. ARPHS **supports** the adoption of the proposed national policy statement for renewable electricity generation, but suggests a minor addition to the proposed text. The following recommendation to add, alter or amend the policy statement will, we believe, provide clearer interpretation for the purpose of compliance.

6. The wording of Policy 2, while allowing for faster processing of renewable electricity generation activities, could lead to potential misunderstanding by the general public on the application of the policy. For example, there may be situations where the general public could believe that affected communities' concerns or potential health effects will not be appropriately avoided, remedied or mitigated because the "logistic or technical practicalities" associated with the proposed activity place some constraints in achieving those measures.
7. ARPHS believes that policies should be clearly written and be easily understood by the public. Our concern about potential misinterpretation of policy 2 could be easily addressed by the addition of the phrase: "*while not detracting from the requirements in Part 2 of the Resource Management Act 1991*". This text addition could be made either under 'Matter of national significance' or as an addition to Policy 1 (i.e. becoming point iii of Policy 1). The addition of the proposed text is consistent with requirements under section 45 and 104 of the Resource Management Act 1991.
8. ARPHS understand that there is nothing in the proposed national policy statement for renewable electricity generation to indicate that Part 2 of the RMA 1991 no longer applies, but believes that a confirmation of this would not be damaging and may provide reassurance to the general public.
9. Auckland Regional Public Health Service wishes to be heard in support of this submission.
10. If others make a similar submission, ARPHS would not be prepared to consider presenting a joint case with them at any hearing.



Sunil Kushor  
Healthy Environments Manager  
Auckland Regional Public Health Service



Dr Simon Baker  
Medical Officer of Health  
Auckland Regional Public Health Service

Signature of person making submission or person authorised to sign on behalf of person making submission.

Date: 31<sup>st</sup> October 2008

Address for service of person making submission:

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