

SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

To: The Board of Inquiry
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This is a submission for Airways Corporation of New Zealand Ltd (Airways) on the proposed National Policy Statement for Renewable Electricity Generation that was publicly notified on 6 September 2008.

1. The specific parts of the proposed national policy statement that Airways submission relates to are:

This submission relates solely to the following proposed policies, in so far as they have the potential to affect the safe and efficient operation of the air traffic network.

- Policy 2 – Acknowledging the practical constraints associated with the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities.
- Policy 4 – Enabling the identification of renewable electricity generation possibilities.
- Policy 5 – Supporting small and community-scale renewable electricity generation.

2. Airways conditionally support the proposed national policy statement.

3. The reasons for Airways submission are:

Airways have principal responsibility for facilitating the safe movement of all domestic and international air traffic in New Zealand airspace. Airways delivers air traffic control and advisory

services in national and international airspace including area control, approach control and flight information services.

Airways operate a significant number of radar and navigational aid sites throughout New Zealand. Sites may include a wide range of infrastructure such as receiving stations, communications stations, primary and secondary surveillance radar sites, emergency generators, and transmitting stations.

Airways supports the proposed national policy statement in so far that it will promote the development, upgrading, maintenance, and operation of new and existing renewable electricity generation activities.

However, Airways has strong concerns that the nature of renewable electricity generation activities, wind farms in particular, could have potential impacts on Airways existing radar and navigational aid sites or facilities and flight paths (including any future radar and navigational aid sites or facilities and flight paths).

Airways' views in respect of the proposed national policy statement are as follows:

- Policy 2

Airways strongly support the wording of proposed Policy 2, and point (iv) in particular. The proposed policy recognises the need to take into account existing infrastructure, such as the radar, navigation and telecommunications structures and facilities operated by Airways, when considering the implementation of measures to mitigate the effects of renewable electricity generation activities.

- Policies 4 and 5

The renewable electricity generation activities identified in proposed Policies 4 and 5, can potentially affect Airways existing (or proposed) radar and navigational structures, facilities and flight paths.

Windfarm towers, masts and turbine blades can obstruct the radar signal along aircraft routes. Use of metallic and flat components can reflect signals and give false replies. Impacts are most likely when windfarm towers, masts turbine blades and other support structures are located on the crest of hills, which are typical locations for wind generation.

The velocity of turbine blades are similar to that of aircraft so the Doppler filtering employed by the Airways Primary radar to detect moving targets would not be effective and would result in the blades producing plots. This could result in the display of false targets (clutter) on Air Traffic Control (ATC) Radar Displays. The display of false information to radar displays may result in an increase to potential safety risks for air travel.

Although Airways has the capability to mask signals from areas where there is such disturbance to radar, this would also have the undesirable effect of reducing the aircraft detection capability. This means that aircraft would pass undetected through the masked area, potentially increasing risks of collisions.

Airways conditionally supports Policies 4 and 5, subject to a proposed amendment to ensure local authorities have particular regard to the need to protect strategic assets such as Airways infrastructure from adverse effects associated with these renewable electricity generation activities.

4. Airways seek the following decision from the Board of Inquiry:

Airways seek:

- Retention of Policy 2, without amendment.
- Retention of Policies 4 and 5, subject to the following amendment:

Policy 4

By 13 March 2012, local authorities are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to enable activities associated with:

- the identification and assessment by generators of potential sites and energy sources for renewable electricity generation*
- research-scale investigation into emerging renewable electricity generation technologies and methods.*

Any provisions proposed by local authorities, to enable activities associated with renewable electricity generation, must have particular regard to the protection of existing (or proposed) strategic air navigation and telecommunication assets including the protection of existing (and proposed) flight paths from obstruction.

Policy 5

By 13 March 2012, local authorities are to notify, in accordance with Schedule 1 of the Act, a plan change, proposed plan or variation to introduce objectives, policies and, where appropriate, methods, into policy statements and plans to enable activities associated with the development and operation of small and community-scale distributed renewable electricity generation.

Any provisions proposed by local authorities, to enable activities associated with renewable electricity generation, must have particular regard to the protection of existing (or proposed) strategic air navigation and telecommunication assets including the protection of existing (and proposed) flight paths from obstruction.

5. Airways wish to be heard in support of their submission.

6. Airways do not wish to present a joint case.



As authorised agent for
Airways Corporation of New Zealand Ltd



Date

