



10 September 2009

IN03-01

Board of Inquiry - NPS for Renewable Electricity Generation  
C/- Executive Officer for the Board of Inquiry  
Attn: Josie Beruldsen  
Ministry for the Environment  
P.O. Box 10362  
Wellington 6143

Dear Members of the Board

**Re: Further information on Board of Inquiry questions from the Auckland hearing and the *Local Government New Zealand* remit on windfarms**

Dianne Hale and Kate Barker represented *Local Government New Zealand* and presented our submission on the Proposed National Policy Statement for Renewable Electricity Generation on 22 June 2009.

The Board asked a number of questions, some of which we were unable to answer at the time. The following letter outlines the *Local Government New Zealand* response to some of these questions and outlines the wording of the *Local Government New Zealand* remit that was passed at the *Local Government New Zealand* Annual General Meeting on 29 July 2009.

**1. Council subsidies to promote solar energy**

The Board asked for examples beyond Nelson where councils had introduced subsidies to promote solar energy. An enquiry over one of the *Local Government New Zealand* email groups came up with the following:

- Western Bay of Plenty District Council- automatic remission of fees for first building consent inspection for solar hot water conversions
- Hauraki District Council- reduced fees for solar hot water conversion
- Tasman District Council- subsidises half the cost of building consent fees
- Porirua City Council - building consent fee waiver facility available for installation of solar hot water cylinder heaters
- Taupo District Council - free building consents for solar hot water
- New Plymouth District Council - discounted building consent fee for solar water heater installations.

We know that there are similar initiatives in a number of other councils around the country, but those councils did not respond to our email group enquiry.

## 2. Thoughts on reversibility or irreversibility

The Board asked whether we had given any more thought to the concepts of reversibility and irreversibility and sustainability. At this stage we have nothing further to add.

## 3. Examples of consenting costs for small scale generation

At the hearing the Board wanted to get a sense of the issue of consenting costs for small scale generation. The Board had a sense from other submitters that the costs could be considerable and asked whether *Local Government New Zealand* had some examples on the issue.

We have not been able to undertake this further research for the Board. Our view is that consenting costs would not be great as long as clear guidance, information and training was available for councils, specifically on the types of technologies available for small scale generation, how the technology works and any expected environmental effects. Councils in New Zealand are currently expected to individually work through these technical issues on their own with no additional guidance from central government on these matters.

## 4. 'Zoning' of tidal energy developments (based on the current AMA system for aquaculture)

The Board asked us to check with our members on what they would think about tidal energy developments being 'zoned' based on the current Aquaculture Management Area system for aquaculture.

Our members do not have a position on this. However, relevant issues in coastal management have recently been discussed by the regional sector. The following are a few wider points from that discussion that we think the Board should consider:

- The current provisions for aquaculture in the RMA are fraught, complex and highly technical. *Local Government New Zealand* have been lobbying for a review of the aquaculture legislation. We are uncertain on how much value or gain there would be in a similar system for tidal energy developments.
- Zoning of public space or 'commons' is not simple. Particularly in relation to coastal areas of high value and multiple or conflicting use (i.e. recreation uses v aquaculture activity which is exclusive).
- Where there is occupation of a 'public' space for a commercial gain *Local Government New Zealand's* view is that a 'rental' should be charged. There are serious issues with the workability of the coastal occupation charging provisions in the Resource Management Act that must be remedied. There is a real reluctance of central government to look at this issue.
- There is a general recognition that there is poor scientific understanding of the marine environment. Improving marine scientific knowledge is a very costly exercise. Regional councils generally take a 'precautionary' approach when it comes to activities in the coastal marine area, creating a zoning for certain activities can make it difficult to assess environmental effects on a site specific basis.
- One of the key issues in relation to consenting and development in marine environments is that of 'integrated management'. At the moment there is a limited overall view or 'management system' for our coastal and marine areas with many players and many government agencies with differing or conflicting interests and roles. *Local Government New Zealand* have asked the government to look at 'coastal management' as part of phase two of the Resource Management Act review. Unfortunately this topic is not on the government agenda in the short to medium term.

5. Local Government New Zealand remit on wind farms

Finally, we would like to draw to the Boards attention the recent remit passed at the last *Local Government New Zealand* Annual General Meeting held in Christchurch on 29 July this year.

The wording of the remit passed by the local government sector is as follows:

*That Local Government New Zealand request Central Government to develop a National Environmental Standard with regard to the siting of wind farms and more specifically on:*

- *The minimum distance turbines can be placed from private residences*
- *Appropriate assessment of noise and vibration from wind turbines, and maximum noise and vibration levels affecting dwellings*

*That Local Government New Zealand request Central Government to develop a National Policy Statement on:*

- *Criteria to identify outstanding landscapes and how the preservation value of these should be balanced against development pressure on them.*

We ask the Board to consider this remit when deliberating and preparing recommendations to the Minister for the Environment.

We thank the Board for the opportunity to clarify some of our positions. Please be in touch if you require any further information or clarification. We would also like to sincerely thank the Board for all of your hard work, and excellent level of understanding of the issues for local government. We look forward to the Boards recommendations in the near future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Eugene Bowen'. The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Eugene Bowen  
Chief Executive  
*Local Government New Zealand*