

Draft National Planning Standards

NZ Wind Energy Association Submission

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August 2018



Introduction

1. The New Zealand Wind Energy Association (NZWEA) welcomes the opportunity to provide a submission on the Draft National Planning Standards (DNPS).
2. NZWEA's members develop and operate wind farms including the upgrading of existing assets. The ability to vary consents for operating wind farms to enable re-powering, and to plan for, consent and develop new generation capacity, is a key business activity.
3. The Association seeks to ensure that statutory planning documents recognise the resource use requirements of renewable electricity generation activities, and gives effect to the requirements of the National Policy Statement on Renewable Electricity Generation 2011 ("NPS-REG") in an integrated manner.
4. The importance of electricity as a source of energy in enhancing our quality of life is well understood. The further electrification of high carbon emitting sectors such as transport and industrial heat is central to transitioning to a low-emissions economy. The expansion of the use of electricity into other parts of the economy highlights the need for statutory planning documents to recognise the Government's renewable energy targets and climate change commitments.
5. The wider electrification of the New Zealand economy also represents a concentration of risk that needs to be managed to ensure the on-going reliability of supply and end-user affordability.
6. Changes to the Resource Management Act to improve the quality and effectiveness of plans is therefore of key importance to the wind industry and the achievement of the government's renewable electricity generation and carbon reduction targets.
7. In this submission NZWEA provides overarching comments in an executive summary, outlines the importance of addressing the current issues for renewable electricity generation and the wind industry and a more detailed response to the proposed CM-2 Draft Noise and Vibration Metrics Standard and support for the further development of planning standards.

Executive Summary

8. The Association is supportive of the DNPS and considers the Standards an important initiative towards improving the effectiveness of the Resource Management Act and enabling renewable electricity generation development.
9. While all the problems identified in the Consultation Document are supported the Association is most concerned with the uncertainty that comes from the inconsistent implementation of the national direction for renewable electricity generation, the level of guidance in current NPS's and the inefficiency that results from the unnecessary variation in plans for end-users that operate on a national scale.

10. The Association recognises the need to ensure local planning issues are addressed but considers the current RMA required plans have elevated these at the expense of matters of national importance.
11. That the minimum proposed standard for plans include references to relevant national policy and environmental standards is supported.
12. The inclusion of noise and vibration metric standards as a mandatory direction is also welcome. The New Zealand Standard 6808:2010 Acoustics Wind farm noise was developed to provide suitable methods for the prediction, measurement and assessment of sound from wind turbines. Notwithstanding the expert nature of the Committee that developed the Standard, Association members have experienced considerable resistance to the acceptance of the Standard when seeking resource consents.
13. In respect to future planning standards the Association notes that the 2016 NPS-REG Outcome Evaluation Report identified that the Statement had not achieved its intended objective.
14. The Association also notes that MfE is currently undertaking an Outcome Evaluation Review of the National Policy Statement for Electricity Transmission. We understand that the completion of the Review has been delayed but in submissions significant issues have also been identified.
15. An effective RMA decision making process for electricity generation and transmission is a pre-requisite to enable the development of renewables and the Association considers both NPS's do not provide appropriate direction and should be redrafted to provide more guidance on the relative importance of renewable energy compared to other matters of national importance under part 2 of the RMA.

Support for The Introduction of National Planning Standards to Address Current Issues

16. The Association supports the aim of the DNPS to make plans simpler to prepare and easier for plan users to understand, compare and comply with.
17. The Association agrees with the five main problems heightened by unnecessary variation in plans that are identified in the Consultation Document:
 - interpreting plans can be costly and time-consuming, particularly for plan users that regularly work across multiple plans
 - some plans are overly complex, making them difficult to use
 - national direction is implemented inconsistently
 - each council and many plan submitters have to spend time and resources developing the structure, form and common content of each plan
 - best planning practice is not able to be implemented efficiently across all plans because they are currently so different
18. In particular NZWEA is most concerned with the current inconsistent implementation of national direction and the inefficiencies that result from so many variations in interpretation and format.
19. In the Association's view the current planning process results in a significant cost and uncertainty for consent applicants. The narrow focus on the local effects of infrastructure without adequately considering the national benefits creates uncertainty and risk.
20. The Association references the 2016 Report on the effectiveness of The National Policy Statement for Renewable Electricity Generation (NPS-REG) which concluded that there had been no noticeable increase in the consistency of REG planning provisions across regional policy statements or regional or district plans. The Association supports the

Review findings and considers the introduction of national planning standards and a revision to the NPS-REG to provide more detailed direction and guidance are required to better support renewable energy generation.

21. A simplified and lower cost process would also be helpful to progress development of smaller wind farm sites, particularly those with a community structure that may have limited RMA expertise and financial resources.
22. The Productivity Commission in their Low-emissions Draft Report sought submissions on the effectiveness of the RMA and whether it unduly constrains investment in renewable electricity generation. An analysis of submissions confirms a consistent view that the RMA is not effective and that the NPS-REG needs to be strengthened.
23. The Association also note that MfE is currently undertaking an Outcome Evaluation Review of the National Policy Statement for Electricity Transmission. We understand that the completion of the review has been delayed but in submissions significant issues have also been identified.
24. An effective RMA decision making process for electricity generation and transmission is a pre-requisite to enable the development of renewables and the Association considers both NPS's do not provide appropriate direction and should be redrafted to provide more guidance on the relative importance of renewable energy compared to other matters of national importance under part 2 of the RMA.
25. In the Association's view New Zealand has lacked an integrated approach to developing a low carbon strategy and set of implementation actions and this has been a concern. The material level of emissions reduction required and potential cost to meet the 2030 Paris target and a longer-term net zero position warrant a specific focus.
26. The Inquiry by the Productivity Commission, the proposed Zero Carbon Bill and the refresh of the NZ Energy Efficiency and Conservation Strategy, the introduction of National Planning Standards and the recently announced consultation on proposed improvements to the Emissions Trading Scheme are important developments in ensuring the alignment of strategy and actions which the Association supports.

Specific Comments on the Draft Noise and Vibration Metrics Standard

27. New Zealand Standard 6808:2010 Acoustics Wind farm noise was developed to provide suitable methods for the prediction, measurement and assessment of sound from wind turbines. The Standard development included numerous acoustic experts to protect the health and amenity at nearby noise sensitive locations without unreasonably restricting the development of wind farms.
28. The Standard has been adopted by wind farm developers in seeking land use consents.
29. Notwithstanding the expert nature of the Committee that developed the Standard, Association members have experienced considerable opposition to the acceptance of the Standard when seeking resource consents.
30. In particular in a number of consent applications the adoption of recommended noise limits based on a defined physical distance from site boundaries has been proposed rather than adopting the noise limits based on notional boundaries contained in the NZ Standard. The implications of which place limits on development opportunities that reduce the commercial viability of wind farm developments.
31. Most recently in 2017 Association members considered it necessary to appeal to the Environment Court proposed changes to a District Plan which introduced physical setback limits from site boundaries which would have had a significant impact on the re-powering of existing wind farms and risked creating a precedent that might be adopted by other councils.

32. While the matter was resolved through mediation and subsequent negotiation there was a significant cost incurred by Association members in gaining acceptance to adopt NZS6808.
33. The Association is therefore supportive of the DNPS inclusion of a noise and vibration metrics standard which ensure consistency of application and provide clarity of requirements that wind farm developers must meet when seeking resource consents.
34. Table 30 references the acoustic standards included in the DNPS. NZS6808 incorporates measurement procedures and the methodology to undertake assessments and is therefore complete in its own right. It is our understanding that many of the specific acoustic Standards have been developed as they do not fit with the requirements of NZS6801 and NZS6802. The requirement in Direction 4 to require any plan rule to be consistent with the assessment method in section 6 of Standard 6802 therefore should be removed.

Future Planning Standards

35. The Consultation Document notes that future sets of planning standards could be content-based and useful to support the implementation of national direction in a consistent manner across plans and to standardise an area of technical dispute such as identifying outstanding natural features and landscapes.
36. The 2016 NPS-REG Outcome Evaluation Report clearly identified the NPS is not achieving its objective and Association members have had numerous issues with the current inconsistent implementation of national direction.
37. The recent Productivity Commissions Low-emissions Inquiry Draft Report and Transpower's Energy Futures White Paper both forecast the requirement for a significant increase in electricity generation through to 2050. If the government's emission reduction targets are to be met a large share of the forecast growth will need to be from renewable sources such as wind, solar and geothermal generation.
38. At a time when it is widely accepted that a significant increase in renewable electricity generation will be required to support the decarbonisation of the economy it is essential that the plans give appropriate relevance and direction to infrastructure development that contributes to the achievement of nationally important emission reduction targets.

About the NZ Wind Energy Association (NZWEA)

- The NZWEA is an industry association that promotes the development of wind as a reliable, sustainable, clean and commercially viable energy source.
- We aim to fairly represent wind energy to the public, Government and energy sector.
- Our members are involved in the wind energy sector and include electricity generators, wind farm developers, lines companies, turbine manufacturers, consulting organisations and other providers of services to the wind sector
- By being a member of NZWEA you are assisting the development of wind energy in New Zealand and helping to reduce our greenhouse gas emissions to meet climate change targets.

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