

# Te Tai o Poutini Plan Proposed Plan Submission form

Te Tai o  
Poutini Plan  
Proposed  
Plan

Have  
your  
say!

We need your feedback. We want to hear from you on the proposed Te Tai o Poutini Plan. What do you support and what would you like changed? And why? It is just as important to understand what you like in the Proposed Plan as what you don't. Understanding everyone's perspectives is essential for developing a balanced plan.

## Your details:

First name: David Surname: Mackay

Are you submitting as an individual, or on behalf of an organisation?  Individual  Organisation

Organisation (if applicable): Inchbonnie Hydro

Would you gain an advantage in trade competition through this submission?  Yes  No

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am  /am not  directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: 48 Swann Beach Rd, Stannore Bay  
Auckland 0932

Email: dave@inchbonniehydro.co.nz Phone: 021 470 611

Signature: [Signature] Date: 11 Nov 2022

## Your submission:

The specific provisions of the proposal that my submission relates to are:

- |                                                         |                                                                         |                                            |
|---------------------------------------------------------|-------------------------------------------------------------------------|--------------------------------------------|
| <input type="checkbox"/> Strategic Direction            | <input checked="" type="checkbox"/> Energy Infrastructure and Transport | <input type="checkbox"/> Hazards and Risks |
| <input type="checkbox"/> Historical and Cultural Values | <input type="checkbox"/> Natural Environment Values                     | <input type="checkbox"/> Subdivision       |
| <input type="checkbox"/> General District Wide Matters  | <input checked="" type="checkbox"/> Zones                               | <input type="checkbox"/> Schedules         |
| <input type="checkbox"/> Appendices                     | <input type="checkbox"/> General feedback                               |                                            |

All submitters have the opportunity to present their feedback to Commissioners during the hearings process. Hearings are anticipated to be held in the middle of 2023. Please indicate your preferred option below:

I wish to speak to my submission  I do not wish to speak to my submission

If others make a similar submission, would you consider presenting a joint case with them at a hearing?

Yes, I would consider presenting a joint case  No, I would not consider presenting a joint case

**Public information** - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published to the Te Tai o Poutini Plan website and available to the public. It is your responsibility to ensure that your submission does not include any personal information that you do not want published.

Want to know more?

[www.tppp.nz](http://www.tppp.nz)

0508 800 118



Te Tai o Poutini  
PLAN

A combined district plan for the West Coast

11 November 2022

Te Tai o Poutini Plan Team  
PO Box 66  
388 Main South Road,  
Paroa  
**GREYMOUTH 7805**

Email: [info@tpp.nz](mailto:info@tpp.nz)

Dear Sir/Madam,

## Te Tai o Poutini Plan

### Introduction

The following submission is presented on behalf of Inchbonnie Hydro Limited (IHL). IHL would like to thank the District Councils on the West Coast (Buller, Grey and Westland) for the opportunity to provide a submission on the Te Tai o Poutini Plan (TTPP).

IHL built, owns and operates a 1.7 megawatt run of the river hydro scheme in the Hohonu ranges between Arthurs Pass and Greymouth. The scheme began generating electricity in December 2015 and contributes 9 Gigawatt hours of electricity per annum (enough energy for 1200 homes) to the Westpower network.

The current TTPP is of significant interest to IHL along with any changes to the current District planning framework that impact on the operation and costs associated with our existing business on the West Coast.

Run of the river hydro schemes can generally be held in high regard for the contribution they bring to the community. In the case of IHL:

- The scheme was built under very strict terms and conditions to ensure the landscape, flora, fauna and aquatic ecosystems remained intact and unaffected in any significant way. The construction of the scheme has enhanced public access with the walking track we made, now opening up to the upper reaches of Rubieslaw and Johnstons streams. This access has been enjoyed by trampers, canyoners and hunters alike. As part of an ongoing commitment to conservation efforts in the area IHL is actively involved in the predator eradication program in support of the Department of Conservation.
- The power generated by IHL brings stability to the power network in this relatively remote area. Connected to the Westpower network where outages are common, the lines company often rely on Inchbonnie Hydro generation for voltage support and power supply. The community directly benefits from IHL being operational.



- As with all renewable energy, hydro schemes contribute to the National energy mix and directly replace energy that would otherwise be generated by fossil fuels. The annual generation by IHL cuts carbon emissions by over 4000 tons compared to combined cycle natural gas (nearly double that for coal fired generation). Run of the river hydro is a significant part of the national effort to become carbon neutral by 2050. It is inherently good for all New Zealanders and an appropriate use of West Coast resources.

## Specific Responses

### DISTRICT WIDE MATTERS - ENERGY, INFRASTRUCTURE, AND TRANSPORT –Energy

IHL notes that the Plan states under the Statutory Context that amongst other planning instruments the Plan must give effect to the West Coast Regional Policy Statement and relevant National Policy Statements specifically, the National Policy Statement for Renewable Electricity Generation 2011.

While we support the provisions outlined in the Energy section of the Plan, we consider that existing Hydroelectric Infrastructure should be included as a Special Purpose Zone similar to that provided for Mineral Extraction. This is consistent with the requirements to give effect to West Coast Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation 2011. The case supporting this change is outlined in the following submission.

#### Overview of renewable energy generation schemes on the West Coast

As stated earlier, IHL own and operate a small hydro power stations located near Inchbonnie. This station is small in scale and sits well with the local community, providing a valuable source of renewable energy and as a function of its' connection provide support and capacity for the local transmission networks.

Over the period that IHL has owned this asset assets there has been significant growth in the population and economic activity on the West Coast in general. Along with this growth there has been a greater requirement and increased expectation regarding availability of electricity and security of supply.

It is vital that the TTPP recognises the importance of current hydro-electric infrastructure and supports within reasonable parameters the development of future infrastructure to meet the growing needs of the West Coast.

The provision of a Special Purpose Zone for hydroelectric generation would support the ongoing management of existing hydro-electric assets and go a long way to support further development of new opportunities.

#### West Coast Regional Council Policy Statement

As discussed above the TTPP must give effect to the West Coast Regional Policy Statement (WCRPS).

The current WCRPS and associated Land and Water Plan, includes Rule 54 which creates a separate set of criteria for consenting activities related to hydroelectric generation. The Plan also includes Schedule 13 which includes a schedule of hydroelectric schemes controlled under Rule 54 along with those

#### **Explanation**

Rule 54 relates to the consenting of existing activities associated with lawfully authorised and established hydroelectric power generation schemes. This Rule recognises that certain dams identified in Schedule 13 have been lawfully established and operated responsibly for a number of years and the range of issues which require consideration by the Council is not as wide as for a new dam. It is not expected within the lifetime of this Plan that a new consent an existing hydroelectric generation scheme would be declined, therefore a controlled activity status is appropriate and it provides certainty for the applicant.

consented after the Schedule was drafted. An explanation is provided on the reasons for including these facilities in a separate planning framework.

Extracts of these Plans are included in Appendix A.

The provision of a Special Purpose Zone for hydroelectric generation is consistent with the WCRPS and would support the ongoing management of existing hydro-electric assets owned by NZE and go a long way to support further development of new opportunities.

## Examples of Hydro Generation Zones in Other District Plans in New Zealand

There are a number of examples of hydroelectric assets being included in Special Zones in other District Plans in New Zealand. These Zones are included in the current Queenstown Lakes District Plan and Central Otago District Plan.

Again, the provision of a Special Purpose Zone for hydroelectric generation is consistent with other District Plans in New Zealand where similar facilities exist.

## Consistency with New Zealand government wider environmental policy

In considering any planning instrument the TTPP must take account of wider government policy regarding reducing net emissions of greenhouse gases the impacts on potential mitigation measures to climate change such as New Zealand's renewable electricity generation goals.

We consider that TTPP can play a meaningful role in assisting the Government to meet its emission reduction and renewable electricity generation targets and conserve the natural values found on West Coast land from the impacts of climate change.

As outlined above, the planning regime for land where IHL renewable electricity generation and distribution infrastructure is located should recognize the importance of renewable electricity generation. The provision of a Special Purpose Zone for hydroelectric generation would support these policies.

## DISTRICT WIDE MATTERS – SUBDIVISIONS – Financial Contributions

IHL has concerns that under the Financial Contributions section the Councils have proposed provisions seeking financial contributions on land use consents to remedy or mitigate adverse effects on environmental, natural landscape and biodiversity values. There is no methodology in these provisions on how these contributions will be calculated, how the money would be collected and managed, nor how it would be spent on mitigation (rule FC-R12). While we understand the requirements for financial contributions to support additional operational requirements or provision of new infrastructure, we consider that conditions or costs imposed to remedy or mitigate adverse effects, on environmental, natural landscape and biodiversity values, should be managed through Regional Council consents.

IHL, therefore, opposes the inclusion of provisions relating to seeking financial contributions on land use consents to remedy or mitigate adverse effects on environmental, natural landscape and biodiversity values.

## Conclusion

While IHL supports the provisions outlined in the Energy section of the Plan, we consider that existing Hydroelectric Infrastructure should be included as a Special Purpose Zone similar to that provided for Mineral Extraction. This is consistent with the requirements to give effect to the West Coast Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation 2011.

The addition of this special zone and associated rules would also be consistent with provisions provided in similar District Plans throughout New Zealand.

IHL opposes the inclusion of provisions relating to seeking financial contributions on land use consents to remedy or mitigate adverse effects on environmental, natural landscape and biodiversity values. The methodology for assessment and management of these funds is unclear and we consider that conditions or costs imposed to manage these effects should be managed through Regional Council consents.

Hydroelectric generation is vital infrastructure on the West Coast now and in the future and should be recognised in the various planning instruments that impact on its ongoing operation and future development.

IHL wishes to be heard in respect of its submission and we are happy to answer any queries or meet and discuss any of the issues and thoughts outlined above. It is imperative that the TTPP engage directly with existing hydroelectric generation stakeholders to ensure the new plan achieves its objectives.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. MacKay', written in a cursive style.

Dave MacKay

Managing Director