



24 March 2026

# Northpower – Hearing 9 – Renewable Electricity Generation

*David Badham and Andrea Greenhalgh*

**B&A**

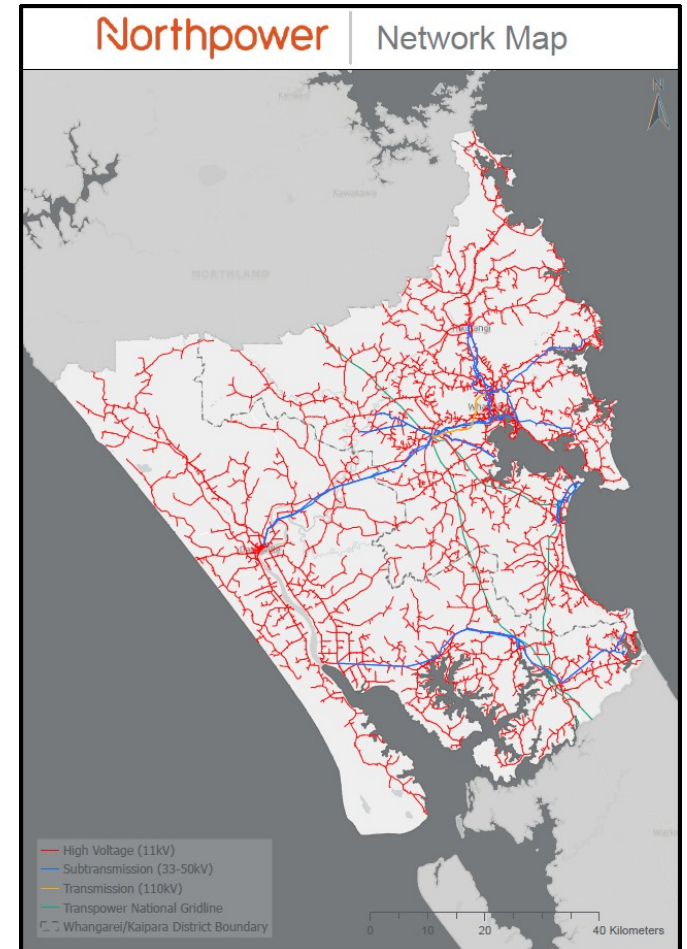
Urban & Environmental

# Agenda

- Background to Northpower
- Renewable Electricity Generation Provisions, noting s42A Addendum
- Response to Rebuttal Evidence by Director-General of Conservation
- Conclusions / Questions

# Northpower Network

- Network consists of:
  - 5,200km overhead lines;
  - 1,300km underground lines;
  - 600km underground fibre; and
  - Approx 1,000km aerial cable.
- Approx. 62,500 customers.
- Asset locations driven by community demand and the need for linear network design.



# Importance of Renewable Electricity Generation to Northpower

- Significant investment in harnessing the region's renewable energy capacity through generation.
- Examples include:
  - 19.3MWDC solar farm, Te Puna Mauri ō Omaru in Ruawai.
  - Renewal of its consents for the 5MW Wairua Falls hydroelectric power station.
  - Construction of 18MW solar farm in Maungatapere, which will be commissioned in December 2026 and supply 3,700 homes per year.

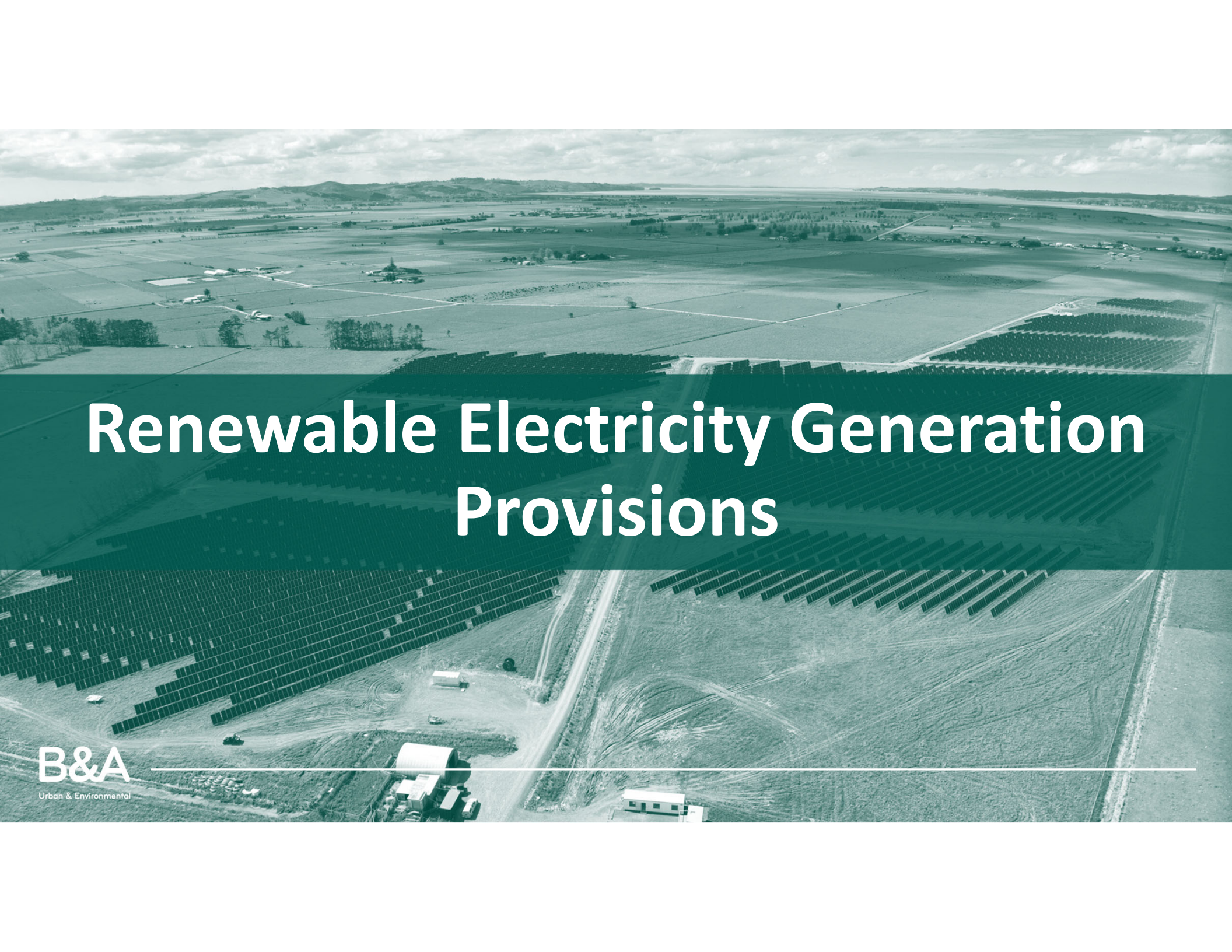


*Te Puna Mauri ō Omaru, Ruawai*

# New and Amended National Direction

- Legal effect from 15 January 2026.
- Key documents relevant to the Hearing 9 include:
  - Amended NPS Renewable Electricity Generation;
  - New NPS Infrastructure;
  - Amended NPS Electricity Networks; and
  - NES Electricity Network Activities.
- Amendments give greater recognition to the operational and functional needs of infrastructure.
- Under Section 55(2D) of the RMA, councils must give effect to national direction “as soon as practicable.”
- The Reporting Officer recommends that the PDP be updated now to implement these changes. I concur that this is the most practical approach.





# Renewable Electricity Generation Provisions

# Additional Areas of Agreement in S42A Addendum

- Reporting Officer supports adding “activities” to the REG-O3 title.
- Reporting Officer maintains position on DoC amendments to REG-P4 recommending no changes.
- Reporting Officer supports amending REG-R9 to allow an extra 3m for existing solar generation activities and to retain the 10% threshold for other REG activities. Also recommends the rejection of the DoC request for a temporal limit.

I support these amendments and I have no further comment, unless the Hearings Panel has questions.

# Additional Areas in S42A Addendum

- Community Scale Solar position (REG-R7).
- Large Scale Solar Farms (REG-R8) – RD and non-compliance with the NZS 6808:2010 Acoustics - Wind farm noise.

Northpower are no longer pursuing these points and will abide by the Panel's recommendation on these matters.

**Overall** = there is a large degree of alignment with the Reporting Officer's s42A Addendum position.

# Policy REG-P2 - Amend

- S42A addendum maintains that “repair” is not needed in REG-P2, as “maintenance” already covers repair under the NPS-REG.
- Including “repair” in REG-P2 is necessary because:
  - Repairs are generally urgent, reactive, and essential for safe and efficient operation;
  - Maintenance is generally proactive & designed to prevent failures; and
  - Including “repair” reduces interpretation uncertainty and consenting risk, avoiding unnecessary resource consents.

# Policy REG-P2 - Amend

- I recommend the following wording for REG-P2:

## Policy REG-P2

Enable the effective development, operation, maintenance, **repair** and upgrade of renewable electricity generation activities

~~"Provide for~~ Enable the effective and efficient development, operation, maintenance, **repair** and upgrading of renewable electricity generation activities at a range of scales and sources, particularly from solar and wind energy resources of the Kaipara District.

# Response to Rebuttal Evidence by Department of Conservation

- Restricted discretionary activity status for REG-R8 is appropriate. The matters of discretion are board and cover relevant matters.
- Example of “lake effect” in DoC legal submissions covered by clause e) – “any effects on ecosystems and indigenous biodiversity”.
- RD enables targeted assessment of effects subject to appropriately worded and broad matters of discretion = consistent with the enabling direction in the NPS-REG.
- There are overlay chapters that address other sensitive environments (e.g., Natural Environment Values, Historical and Cultural Values). It is important to let the overlays do their job, and I understand that the provisions of these chapters are subjected to a future hearing.

# Summary & Key Takeaways

- Significant progress has been made on recognising renewable electricity generation within the PDP provisions.
- Key issues remain in the Renewable Electricity Generation Chapter – amendments proposed are necessary and justified.
- Overall, the changes I have outlined are needed to give effect to higher order policy, achieve sustainable management, and enable renewable electricity generation activities in the Kaipara District.

# He Patai? | Any Questions?

David Badham