

9. Energy

Submission No. and Point / Submitter Name	Plan Provision	Summary of Submission	Decision Requested
SECTION 2.6 ISSUES OBJECTIVES AND POLICIES			
	General		
64.20 Department of Conservation	General	Support. The submitter considers the objectives, policies and methods as they promote the management of adverse effects on the environment resulting from these activities and give effect to Part 2 of the RMA	Retain objectives, policies and methods
117.5 Southern District Health Board	General	Agree with the Energy Issues, Policies, Objectives and Methods of Implementation	Supports the Energy Issues, Policies, Objectives and Methods of Implementation in general
87.9 Transpower NZ Ltd	Objectives and Policies	Support. The submitter supports the separate consideration of generation and transmission given the separation of these roles in the electricity industry.	Retain 2.6.2 Objectives and 2.6.3 Policies as notified.
	Introduction		
24.14 South Port NZ Ltd	Introduction	Support. The submitter considers it appropriate to recognise that the Port has a strategic role in assisting with the development of energy projects in the Region.	Retain.
65.14 ICC Environmental and Planning Services	Introduction	Support in part. The submitter considers that it is not clear what the term “energy” encompasses and that this should be clarified	Amend Introduction to explain what “energy” encompasses
	2.6.1 Issues		
87.8 Transpower NZ Ltd	Issues	Support in part. The submitter seeks that Issue 4 include specific reference to the National Grid. This will highlight its national importance and give effect to the NPSET.	<p>(i) The 2.6.1 Issues be amended as follows:</p> <p>“The significant resource management issues for energy are:</p> <p>.....</p> <p>4. Land use and development has the potential to adversely impact on the existing and future utilisation of energy resources and associated</p>

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			infrastructure, <u>including the National Grid.</u> " (ii) And any consequential amendments
	2.6.2 Objectives		
88.62 Federated Farmers	Objective 1	Support in part. The submitter is cautious in respect to the extent to which Council may influence energy usage decisions which sit with private individuals and landowners and believes non-regulatory methods are the best way to ensure energy conservation is promoted through education and encouragement of environmental awards.	Adopt these Objectives as proposed, but focus on non-regulatory approaches for the promotion of more efficient use of energy.
24.15 South Port NZ Ltd	Objective 2	Support. The submitter considers it appropriate to adopt a balanced assessment when considering energy projects in the City this includes wider economic and social benefits such as use of the Port for delivery of components.	Retain.
53.6 NZ Transport Agency	Objective 2	The submitter notes that integrated planning has not been identified as an objective, and suggests that Objective 2 be reworded to include consideration of this.	Retain Objective 2 but reword as follows: "An integrated planning approach is taken to the <u>management of adverse effects resulting from the use and development of local and regional energy resources, recognising and balancing the significance of those effects with the benefits that arise at a local, regional, and national level.</u> "
24.16 South Port NZ Ltd	Objective 3	Support. The submitter considers it appropriate to promote the generation and use of renewable energy resources in the City.	Retain.
24.17 South Port NZ Ltd	Objective 4	Support in part. The submitter suggests that while it is entirely appropriate to recognise the national significance of renewable energy generation, the regional and/or local benefits (both direct and indirect effects) also need to be given adequate recognition within the Plan.	Expand the objective to also recognise the local and regional benefits of renewable energy generation activities.
	2.6.3 Policies		
24.18 South Port NZ Ltd	Policy 2 – Renewable energy	Support. The submitter considers that this policy properly recognises the relevant provisions within section 7 of the Act insofar as they relate to renewable energy.	Retain
77.17 Te Runaka o Waihopai and	Policy 2 – Renewable	Support in part. The submitter considers that this policy needs to acknowledge public health	Amend as follows: "... adverse effects on the environment <u>and public</u>

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Te Runaka o Awarua	energy		<u>health</u> where this is practicable”
117.6 Southern District Health Board	Policies 2 and 5	Due to energy demand projections, the submitter supports the intention to explore renewable energy sources. However, the submitter recommends a wording change to Policy 1 to recognise public health effects	Support Policy 2 and 5 in general. Amend Policy 2: “...recognising the need to avoid, remedy or mitigate adverse effects on the environment <u>and public health</u> where this is practicable.”
34.2 Silver Fern Farms Ltd	Policy 3 – Small and community scale renewable electricity	Support.	Retain intent of policy to make provision for small scale renewable electricity generation activities.
88.63 Federated Farmers	Policy 3 – Small and community scale renewable electricity	Support in part. The submitter believes it is unclear why businesses are not specifically included in this policy and it may be useful if businesses were specifically identified in this policy.	Adopt this policy, with the following wording amendment: <u>Policy 3 Small and community scale renewable electricity:</u> To provide for investigation into and development and operation of renewable electricity resources for use by individuals, <u>businesses</u> and local communities.
24.19 South Port NZ Ltd	Policy 4 – Non-renewable energy	Support in part. The submitter considers that it is also appropriate to specifically recognise the benefits that can be obtained by the development of mineral and non renewable energy resources including both direct and indirect effects on the region. Similar objectives and policies relating to the investigation, development and benefits of non renewable energy sources need to be included. The submitter does not consider it appropriate to require that all adverse effects be mitigated. The RMA allows effects to be remedied, and in some cases there may be residual adverse effects that cannot be avoided, remedied or mitigated, but that on balance the benefits of the activity will outweigh any such effects. This is an entirely acceptable	Include an objective(s) and policy(ies) that also specifically recognise and provide for the regional benefits associated with the development of non-renewable energy generation. Amend the policy as follows: “...where adverse effects can be <u>suitably avoided, remedied or mitigated.</u> ”

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		outcome under the provisions of the Act.	
65.15 ICC Environmental and Planning Services	Policy 5 - Priority	The submitter considers the explanation should be reworded to acknowledge that whilst the use of renewable energy resources can impact on the environment, it is preferable to the use of non-renewable resources which reduces the resource as well as impacts on the environment	Amend the explanation to Policy 5 to read: <u>"While the use of renewable energy resources can impact on the environment, preferring the development and use of renewable energy resource over non-renewable energy resource when forming policy and making decisions on resource consents will provide for future generations by not reducing the resource or impacting on the climate."</u>
SECTION 3 RULES			
87.44 Transpower NZ Ltd	3.6.1- 3.6.5	<p>Oppose in part. The submitter considers that the integrated approach consent requirements for electricity generation and the transmission of electricity to where it is demanded may not be realistic or possible due to the separation of the electricity industry.</p> <p>The submitter seeks that the development of new lines is always considered under the provisions of Section 3.9 Infrastructure but that Section 3.6 Energy includes assessment matters that provide for the feasibility of any connection required to the National Grid.</p>	<p>(i) Amend 3.6.1 as follows:</p> <p>"Small and community scale renewable energy generation and distribution is a permitted activity where the energy generation facility is not located:"</p> <p>....</p> <p>(ii) Amend 3.6.3 as follows:</p> <p>"The following activities are discretionary activities:</p> <p>(A) Small and community scale renewable energy generation and distribution that does not comply with Rules 3.6.1 or 3.6.2 above.</p> <p>(B) Any activity associated with the investigation into the development of any large scale renewable energy generation and/or distribution, except as provided for in Rule 3.6.2 above.</p> <p>(C) Any activity associated with the</p>

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			<p>investigation, development and operation of non-renewable energy generation and/or distribution in the Industrial 4 Zone.”</p> <p>(iii) Amend 3.6.4 as follows:</p> <p>“The following activities are non-complying activities:</p> <p>(A) Any activity associated with the investigation into the development of any large scale non-renewable energy generation and/or distribution, except in the Industrial 4 Zone.</p> <p>(B) Any large scale energy generation and/or distribution activity is a non-complying activity except in the Industrial 4 Zone.”</p> <p>(iv) Amend 3.6.5 as follows:</p> <p>“Applications under Rules 3.6.3 and 3.6.4 above shall address the following matters, which will be among those taken into account by the Council:</p> <p>.....</p> <p>(D) The nature and location of existing renewable electricity generation and distribution activities.</p> <p>(E) Any effects of connecting to existing infrastructure including, but not limited to, roads, navigation and telecommunication structures and facilities, the local electricity distribution network, and the national grid</p>

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			<p>....</p> <p>(H) The ability to connect to existing National Grid transmission lines.</p> <p>(I) The need for, feasibility and effects of providing additional lines/connections to the National Grid including substations.”</p> <p>(v) And any consequential amendments</p>
52.6 NZ Police	3.6.1	Support.	Retain Rule 3.6.1.
64.21 Department of Conservation	3.6.1	Support. The submitter particularly support limits on these facilities locating within areas of significant indigenous biodiversity, identified sites of heritage value, and within an identified outstanding natural feature or landscape.	Retain Rule 3.6.1
102.10 Chorus NZ Ltd	3.6.1	The submitter supports the provisions, as they enable the installation and use of solar panels and other small-scale generation infrastructure to provide energy to utility facilities	Retain Rule 3.6.1
104.10 Telecom NZ Ltd	3.6.1	The submitter supports the provisions, as they enable the installation and use of solar panels and other small-scale generation infrastructure to provide energy to utility facilities	Retain Rule 3.6.1
115.1 New Zealand Historic Places Trust	Various provisions 3.6.1(B), 3.6.5(H) & (I)	<p>The submitter supports these provisions.</p> <p>The submitter notes the Council’s obligations under the RMA, in particular s6(f).</p> <p>The submitter notes that in addition to the specific heritage provisions, the consideration of heritage values is embedded throughout the Plan.</p> <p>The submitter considers the approach recognises that not all important heritage values are listed in the District Plan Heritage Record or covered by the heritage rules of the Plan. The submitter believes it is appropriate</p>	Adopt these provisions as they relate to heritage values: 3.6.1(B), 3.6.5(H) & (I)

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		that the Council has the opportunity to consider effects on heritage values even where such values are not particularly identified for protection in Appendix II.	
64.22 Department of Conservation	3.6.5	Support. The submitter considers this provision gives effect to part 2 of the RMA	Retain 3.6.5