

**ADDENDUM TO:**

**STATEMENT OF EVIDENCE OF HAYLEY STRONGE FOR MERCURY NZ LIMITED**

**As requested to be provided to the Hearing Panel by 1pm Friday 25<sup>th</sup> August 2023.**

**1.0 Energy Cohort**

1.1 At the hearing of PC38 on Fri 18 August 2023 (via the evidence presentation for Genesis) and in a subsequent minute dated 19 August 2023, the Hearing Panel made a request, for coordination by planning experts for Energy Sector participants to PC38. Furthermore, at the hearing of PC42 on Mon 21 August 2023 (via the evidence presentation for Manawa) the Hearing Panel made a request to extend the scope of coordination by planning experts for Energy Sector participants to the provisions in common under PC42.

1.2 Prior to the hearings for the other Energy Section participants, during presentation of my Planning Evidence on 17<sup>th</sup> August 2023, I was requested to provide additional information on the topics outlined below, hence the reason for this 'Addendum'.

1.3 It is noted that the topics below will be considered by the planning experts for the Energy Sector also and all of the participants will attempt to ensure that there are no conflicts in the provisions being proposed with the other provisions in the Strategic Directions chapter or in the General Rural and Rural Lifestyle Environments Chapters.

**2.0 Role of East Taupo Arterial**

2.1 Mercury submission point 68.3 sought a new objective 2.3.2(8) as follows:

Objective 2.3.2(8)

The East Taupo Arterial will continue to act as an 'urban fence' separating urban activities to the west from industrial and rural activities to the east including renewable electricity generation activities.

1.2 Following the presentation of my Planning Evidence on 17<sup>th</sup> August 2023, I was asked to provide additional information to support this recommended objective. Contact Energy were also required to carry out this task.

1.3 Since this time I have had discussions with Mr Mark Chrisp, acting for Contact Energy. We are in agreement to collaborate and respond to the Hearings Panel in relation to the wording of the recommended objective.

## 2.0 Reverse Sensitivity

2.1 Mercury's submission 68.10 sought to amend policy 2.3.3(10) as follows:

Policy 2.3.3(10)

*Manage subdivision use and development of land to ensure that it will not:*

- a. *have an adverse effect on the functioning of the environment where it is located,*
- b. *unduly conflict with existing activities on adjoining properties and the surrounding areas,*
- c. *compromise development consistent with the intent and planned urban built form of the environment where it is located*
- d. *give rise to reverse sensitivity effects ~~from existing uses~~*

2.2 The s.42A report recommended accepting the text "surrounding areas" and deleting policy 2.3.3(10)(d) altogether as policies 2.3.3(10)(b) and 2.3.3(10)(d) have the same intent.

2.3 In my planning evidence I considered that as there is a suitable definition for "Reverse sensitivity" in the Waikato Regional Policy Statement (WRPS) and as policies 2.3.3(10)(b) and 2.3.3(10)(d) have the same intent, that policy 2.3.3(10)(b) should be deleted rather than policy 2.3.3(10)(d).

2.4 It is noted that I did not provide the definition of "Reverse Sensitivity" in my planning evidence for PC38, however I did refer to a definition in my planning evidence for PC42 (submission point 68.64). The Hearings Panel asked for this definition to be provided. My recommended definition is that the definition in the WRPS for "Reverse Sensitivity" is used, as follows:

*Reverse sensitivity - is the vulnerability of a lawfully established activity to a new activity or land use. It arises when a lawfully established activity causes potential, actual or perceived adverse environmental effects on the new*

activity, to a point where the new activity may seek to restrict the operation or require mitigation of the effects of the established activity.

### **3.0 Climate Change section - Recognition of REG activities**

3.1 Mercury's submission point 68.6 sought to include a new objective as follows:

Objective 2.4.2(4)

An increase in the amount of electricity generated from renewable sources within the Taupo District to assist with the decarbonization of the economy.

3.2 Mercury's submission point 68.7 sought to replace policy 2.4.3(2) and 2.4.3(3) with two new policy clauses as follows:

~~Policy 2.4.3(2)–~~

~~Land use activities which will unduly accelerate the effects of climate change will be discouraged.~~

~~Policy 2.4.3(3)~~

~~Urban and built development must be designed in a manner which considers the need to reduce greenhouse gas emissions associated with that development and resulting land use.~~

Policy 2.4.3(2)

Recognise and provide for the use and development of the District's renewable energy resources to facilitate decarbonisation of the economy, including a reduction in greenhouse gas emissions, increased electricity generation capacity, improved security of supply and transmission.

Policy 2.4.3(3).

Enable the upgrading and maintenance of existing and new renewable electricity generation activities and transmission, including where contributing to one of the following;

• adaptation required to mitigate risks from climate change or

• provides for increased electricity output, or greater efficiency

• continued safe, efficient and secure operation.

3.2 The Hearings Panel queried why I had recommended deleting the above policies. The main reasons for deleting these policies were that the policies were not specific enough to 'provide for' and 'enable' activities that help to address climate change. The proposed recommended policies address this need. Also, as we had proposed a new objective in line with the NES-REG (objective 2.4.2(4)) these policies provide the necessary link. Further consideration of this will be carried out with the Energy Cohort.

#### **4.0 Significant and Local Infrastructure - Provision of REG activities**

4.1 Mercury's submission point 68.10 sought to amend policy 2.5.3(2) so that the policy direction is not only to 'recognise' the functional and operational needs of infrastructure, but to 'provide' for these important needs also. Mercury's proposed wording is as follows:

*Policy 2.5.3(2) - Recognise and provide for the functional and operational needs associated with the use and development of nationally and regionally significant infrastructure.*

4.2 The Hearings Panel requested confirmation that this is the same wording in the National Policy Statement – Renewable Electricity Generation. (NPS-REG). I can confirm that the Objective and Policy A in the NPS-REG use this wording, therefore the proposed amendment to the policy is consistent with the NPS-REG. The Objective and Policy A are as follows:

*Objective - To recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation.*

*Policy A*

*Decision-makers shall recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. These benefits include, but are not limited to:*

*a) maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;*

*b) maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation;*

*c) using renewable natural resources rather than finite resources;*

*d) the reversibility of the adverse effects on the environment of some renewable electricity generation technologies;*

*e) avoiding reliance on imported fuels for the purposes of generating electricity.*

## **5.0 Offsetting and Compensation**

5.1 Mercury's submission point number 68.11 sought to add a new policy which covers an increasingly important aspect of consenting REG activities. See policy 2.6.3(7) below as follows:

### *Policy 2.6.3(7)*

*Recognise the benefits of offset measures and compensation and provide for their use as feasible alternatives to manage significant residual adverse effects of renewable electricity generation activities and regionally significant infrastructure.*

5.2 My planning evidence sets out some reasoning for this. The Hearings Panel asked for further justification. Further consideration of this will be carried out with the Energy Cohort.

## **6.0 Conclusion**

6.1 The Energy Cohort are collaborating to provide the Hearings Panel with proposed energy provisions on the Strategic Directions chapter and the General Rural and Rural Lifestyle Environments Chapters.

6.2 I am grateful for the opportunity to contribute in this manner.