

Appendix 2. s32 Analysis Tables

The following table summarises the discussion in s7 of the Renewable Energy and Wind Farms Officer' Report with a comparison of the key issues and options for various policy approaches. It is noted that the Council determined, at the Built and Natural Environment Committee Meeting 25 February 2004 that the 'do nothing' approach, retaining the status quo of 'silence' of the District Plan, was not an option. This has therefore not been assessed.

Table 1: Policy Approaches

	Option 1a Buffer zones and thresholds (Refer Section 7.1 & 7.2 of Report)	Option 1b Overlays- map possible wind farm areas (Refer Section 7.3 of Report)	Option 1c Overlays- constraints mapping (Refer Section 7.3 of Report)	Option 1d Directed case-by-case analysis via resource consent process (Refer Section 7.4 of Report)
Effectiveness and efficiency in achieving District Plan Objectives	<p>Limited</p> <ul style="list-style-type: none"> ∅ Buffer zones and thresholds apply an indiscriminate approach that does not provide for the opportunity to assess effects and investigate ways to avoid, remedy or mitigate these effects. ∅ The approach is probably useful to protect amenity values and communities, but not considered effective or efficient means to consider, and achieve, other Part II matters nor District Plan objectives. ∅ Insufficient information is available to justify this approach. 	<p>Limited</p> <ul style="list-style-type: none"> ∅ This would involve significant resources and time. It is the market/industry's responsibility to investigate/demonstrate viability not the Council's. ∅ This option would not be an efficient use of Council's resources. 	<p>Limited</p> <ul style="list-style-type: none"> ∅ Spatial mapping of resource management issues or constraints would provide static information which would not recognise the numerous variables involved, and their site specific nature. This approach would not be as effective as the resource consent process. ∅ The District Plan and other documents do currently include some mapped constraints or triggers (i.e. heritage) for closer analysis. Mapping of these triggers would be an unnecessary duplication of information, and would not be an efficient use of resources. 	<p>Effective and Efficient</p> <ul style="list-style-type: none"> ∅ Consent application process recognises the range of effects wind farm development can have, and enables applications to be considered on their merits, particularly with respect to Part II analyses. This is consistent with the proposed objectives, to facilitate renewable energy use and development but avoid, remedy or mitigate adverse effects.

	Option 1a Buffer zones and thresholds (Refer Section 7.1 & 7.2 of Report)	Option 1b Overlays- map possible wind farm areas (Refer Section 7.3 of Report)	Option 1c Overlays- constraints mapping (Refer Section 7.3 of Report)	Option 1d Directed case-by-case analysis via resource consent process (Refer Section 7.4 of Report)
Costs	<ul style="list-style-type: none"> ∄ Fixed, but also arbitrary making the approach potentially difficult to justify in every situation. ∄ May be challengeable – not ‘effects-based’ therefore inconsistent with the District Plan and RMA philosophy. 	<ul style="list-style-type: none"> ∄ Mapping all variables would be resource and time consuming. ∄ The map would become a static resource, unlikely to allow for changes in technology and commercial sensitivities, and likely to quickly become outdated. 	<ul style="list-style-type: none"> ∄ Inappropriate to apply/map research findings that have not been undertaken specifically in relation to wind farms i.e. landscape provisions for subdivision is not applicable or equipped to deal with wind farm issues and effects. 	<ul style="list-style-type: none"> ∄ No fixed terms to provide certainty to applicants or the public. ∄ Some repetitive analysis with consideration of each consent application.
Benefits	<ul style="list-style-type: none"> ∄ Fixed – may provide certainty and greater protection i.e. for dwellings. 	<ul style="list-style-type: none"> ∄ Would provide certainty for applicants and public. 	<ul style="list-style-type: none"> ∄ Would provide certainty for applicants and public. 	<ul style="list-style-type: none"> ∄ Presumption of notification to enable full discussion. ∄ Would enable full consideration of all issues and recognise variable nature of effects.
Appropriateness	<p>Limited</p> <p>There is inherent difficulty applying fixed measures to numerous variables and rugged terrain, such as Wellington’s topography.</p> <p>The approach would not recognise changes i.e. advances in technology, would be challengeable on this basis and therefore not considered appropriate.</p>	<p>Limited</p> <p>Council would need to map all variables that determine suitability of a site for wind farm development (i.e. including commercial aspects), which is not considered to be an appropriate priority for the Council. Otherwise, solely mapping resource management issues would be a duplication of other information already held by the Council & that would be discussed via a resource consent process.</p>	<p>Limited</p> <p>It is not considered appropriate to undertake an exercise mapping constraints to wind farm development because this would not provide flexibility to consider each application on its merits. In addition, some of these triggers are already contained within the Plan and would be discussed through the consent process.</p>	<p>Appropriate</p> <p>The site-specific analysis via resource consent process will provide a balanced platform to consider all issues. This is consistent with the philosophy of the RMA and the District Plan, and is an appropriate mechanism to achieve the purpose of the Act, and the proposed objectives.</p>
Conclusion	This approach is not an effective or efficient option to achieve the	This approach is not an effective or efficient option to achieve the	This approach is not an effective or efficient option to achieve the	This is an effective and efficient way to achieve the purpose of the

	purpose of the Act.	purpose of the Act.	purpose of the Act.	Act. This is the preferred option.
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Table 2: Location of Provisions within the Plan, and Relationship with other Plan Chapters.

	Option 2a Utility Rule	Option 2b Throughout all Chapters	Option 2c Stand Alone chapter
Effectiveness and efficiency in achieving District Plan Objectives	<ul style="list-style-type: none"> ∅ Option to house the wind farm development provisions within the Utility Chapter, expanding that chapter to ‘Utilities and Wind Farm Development’. This would be problematic as the utilities and renewable energy provisions are inconsistent, and the provisions would not function in the same way. This could lead to undue confusion. 	<ul style="list-style-type: none"> ∅ Could introduce the wind farm development rule into the relevant chapters it is to apply to (Open Space B and Rural Area) ∅ Could introduce policy encouraging energy efficiency and use of energy from renewable sources across the Plan. 	<ul style="list-style-type: none"> ∅ New chapter objectives and policies would apply across the area based chapters of the Plan i.e. would be considered <i>alongside</i> those of the other chapters’. ∅ This would therefore maintain the integrity, effectiveness and efficiency of existing District Plan objectives. ∅ Other options for the stand alone chapter provisions to <i>over-ride</i> other chapters’ objectives and policies, or to be <i>superseded by</i> other chapters’ objectives and policies, would not achieve this effectiveness of considering all Plan objectives.
Costs	<ul style="list-style-type: none"> ∅ Wind farms dissimilar to other utilities because of scale and character. ∅ Broader renewable energy objectives not relevant. ∅ Identifies problems with Utilities provisions and new ridgeline and 	<ul style="list-style-type: none"> ∅ Reduces the integrity of the issue by splitting in to individual provisions. ∅ If required to introduce the wind farm development rule into the Open Space chapter this would be a divergence from the direction of that chapter and may open up issues/discussion beyond the scope of this plan change. 	<ul style="list-style-type: none"> ∅ Introduces a new method of interpretation i.e. objectives and polices apply across the Plan and the rule only applies to two zones – may lead to confusion.

	hilltops provisions.	<ul style="list-style-type: none"> ⊄ More complicated to amend in future i.e. if renewable energy technology changes requiring changes to the Plan. 	
Benefits	<ul style="list-style-type: none"> ⊄ Doesn't require adding a whole new chapter so would be administratively efficient. 	<ul style="list-style-type: none"> ⊄ Consistent with the area-based activity rule approach taken in the Plan i.e. for an activity in the rural zone you would go to the rural chapter. ⊄ Appropriate to strengthen the policy of encouraging energy efficiency and use of energy from renewable sources across the Plan, will serve as a trigger/reminder to include this in each area chapter i.e. Central Area, Residential etc as these are the most commonly used chapters. This 'duplication' avoids the risk of a new chapter provisions not being referred to in practice. 	<ul style="list-style-type: none"> ⊄ Consistent with current District Plan format, easy to identify and user-friendly. ⊄ Provides integrity to renewable energy as a resource management issue by a collective chapter rather than fragmenting the issues throughout the Plan. ⊄ Enables future changes to be more easily integrated into the chapter i.e. if technology changes and solar energy becomes an issue requiring rules or provisions.
Appropriateness	Not considered appropriate	Quite appropriate	Appropriate
Conclusion	This approach is not an effective or efficient option to achieve the purpose of the Act.	This is in part an efficient and effective to meet the purpose of the Act. Recommend to strengthen policies relating to energy efficiency and renewable energy use within appropriate area based rules. This should provide support for the uptake of energy efficiency principles, for example at a domestic scale, or development stage i.e. consent for new subdivision.	This is an effective and efficient way to achieve the purpose of the Act. This is the preferred option.

Table 3: Rule Options

	Option 3a Permissive Rule i.e. Discretionary Activity (Restricted) (or Controlled Activity)	Option 3b Analyse all Issues i.e. Discretionary Activity (Unrestricted)	Option 3c Restrictive Rule i.e. restrict development from Ridgeline and Hilltop overlay.
Effectiveness and efficiency in achieving District Plan Objectives	<p>Limited</p> <p>Council can only consider those issues that are listed in the rule.</p> <ul style="list-style-type: none"> ∄ Rule to refer to all commercial (i.e. non domestic) wind energy development. ∄ The approach is probably useful to protect amenity values and communities, but not considered effective or efficient means to consider, and achieve, other Part II matters nor District Plan objectives. 	<p>Most effective and efficient</p> <ul style="list-style-type: none"> ∄ Rule to refer to all commercial (i.e. non domestic) wind energy development. ∄ No restrictions on what Council can consider - consideration is guided by listed assessment criteria covering the key issues, but other matters deemed relevant can be considered in addition. ∄ Presumption of notification. ∄ Effective and efficient means to consider all issues and involve interested parties and therefore achieve objectives. 	<p>Limited</p> <ul style="list-style-type: none"> ∄ More restrictive assessment criteria i.e. for sites within identified ridgeline and hilltop overlay area is not considered effective nor efficient because of the scale of the wind farm activity and its effects, and the purpose of the overlay. ∄ Ridgeline and Hilltop Overlay identifies visually prominent areas. It was prepared in response to domestic scale development. Wind farm development is substantially and wholly different. It is questionable as to whether there are any resource management grounds to justify a split based on the overlay.
Costs	<ul style="list-style-type: none"> ∄ Restricting Council’s discretion is too limiting – there are too many variables and site specific variations. ∄ This rule tends to result in fragmentation of the issues, does not encourage consideration of the whole picture. ∄ Wind Energy technology is changing quickly and NZ’s experience in wind farm development is in its infancy – this rule may not provide flexibility to properly consider new and emerging technologies adequately. 	<ul style="list-style-type: none"> ∄ Presumption of notification provides for full discussion with communities of interest. ∄ Flexibility to respond to changes in technology. 	<ul style="list-style-type: none"> ∄ Inappropriate to use visibility as a determining factor when it is one of many factors. ∄ Cannot conclude that wind farm development slightly outside the ridgeline and hilltop area, or on an adjacent ridgeline, would necessarily have any lesser impact (i.e. if at a scale of 100m) than inside. Therefore inappropriate to draw the line based on visibility of existing ridgelines and hilltops. ∄ Challengeable

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Benefits	<ul style="list-style-type: none"> ∄ Possibly more streamlined consent process. 	<ul style="list-style-type: none"> ∄ Enables a balanced and more integrated consideration of issues. ∄ Carries presumption of notification, provides opportunity for full participation by interest groups. ∄ Provides flexibility to properly consider new and emerging issues/technological change adequately. 	<ul style="list-style-type: none"> ∄ Gives clear direction to applicants and the public.
Appropriateness	Based on the above, inappropriate.	Based on the above, appropriate.	Based on the above, inappropriate.
Conclusion	This approach is not an effective or efficient option to achieve the purpose of the Act.	This approach is an effective or efficient option to achieve the purpose of the Act. This is the recommended option.	This approach is not an effective or efficient option to achieve the purpose of the Act.