

14 August 2023

Hearings Advisor
Greater Wellington Regional Council

Attention: Whitney Middendorf

By e-mail: regionalplan@gw.govt.nz

WELLINGTON REGIONAL POLICY STATEMENT – PROPOSED CHANGE 1 HEARING STREAM 3: CLIMATE CHANGE

JOINT HEARING STATEMENT ON BEHALF OF THE FUEL COMPANIES (SUBMITTER 157) AND POWERCO (SUBMITTER 134)

1. INTRODUCTION

- 1.1 This is a joint hearing statement prepared on behalf of bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (*the Fuel Companies*) and Powerco Limited (*Powerco*) on Hearing Stream 3 – Climate Change. This hearing statement represents the views of the Fuel Companies and Powerco and is not expert evidence. The Fuel Companies and Powerco will not be attending the hearing but ask that this Hearing Statement be tabled before the Panel.
- 1.2 The Fuel Companies and Powerco made the same or similar submissions in relation to the matters addressed for this hearing stream and have an interest in the following report topics:
 - Climate Change General
 - Energy, Waste and Industry
 - Natural Hazards
 - Nature-Based Solutions
 - Transport
- 1.3 The Fuel Companies and Powerco generally endorse the recommendations in the s42A reports relating to the above topics and there is only one matter that the submitters wish to raise with the Hearing Panel, as addressed in the section below.

2. REPORT FOR ENERGY, WASTE AND INDUSTRY – POLICY 39 AND EXPLANATION

- 2.1 The notified amendment to clause (a) in Policy 39 is to have particular regard to benefits of renewable electricity generation and regionally significant infrastructure “*particularly where it contributes to reducing greenhouse gas emissions*”.
- 2.2 The submission of the Fuel Companies and Powerco on this Policy is that not all regionally significant infrastructure is, itself, able to contribute to a reduction in greenhouse gas emissions. In addition, their submissions were concerned that the policy explanation is too focused on adverse effects and requests to reframe this explanation to better recognise and list the benefits regionally significant infrastructure.

2.3 The s42A report (at paragraph 142) notes that reference to ‘particularly’ in Policy 39 is unclear and potentially confusing. At paragraph 143 the s42A report recommends that Policy 39(a) is amended to read “~~in particular,~~ including where it contributes to reducing greenhouse gas emissions”. In relation to this amendment the s42A report states:

“This amendment still ensures the GHG emission reduction benefits of regionally significant infrastructure is considered where relevant and appropriate for the proposal, without implying more weight is to be given to these benefits in all circumstances over the other benefits of that infrastructure (e.g. providing essential services to communities).”

2.4 The Fuel Companies and Powerco support the recommended amendment to Policy 39, and note that it is consistent with, and similar to, a recommended amendment to Policy 7 (recognising the benefits from renewable energy and regionally significant infrastructure).

2.5 In relation to the policy explanation the s42a report (at paragraph 146) states “...I recommend that the proposed explanation for Policy 39 is amended to be less focused on adverse effects of REG and regionally significant infrastructure and more focused on the benefits of this infrastructure in accordance with the purpose and intent of the policy.”

2.6 However, the explanation for Policy 39 continues to state “*particularly to contribute to reducing greenhouse gas emissions*” and the Fuel Companies and Powerco are concerned that the explanation is not consistent with the recommended amendment to the policy. While the explanation does not alter the application of the policy, it does act to guide decision-makers and plan users and so it should accurately reflect the intent of the policy. The Fuel Companies and Powerco suggest that this could easily be remedied through a minor change to the explanation as follows (red ~~strikethrough~~ and underline):

“~~particularly to~~ including where it ~~contributes~~ to reducing greenhouse gas emissions”

3. CONCLUDING STATEMENT

3.1 Thank you for your time and acknowledgement of the issues raised in the submissions from the Fuel Companies and Powerco. Please do not hesitate to contact the writer (miles.rowe@4sight.co.nz, ph. 0272762532) should you wish to clarify any matters addressed herein.

Kind regards,



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