

Summary of Evidence & Speaking Notes of Ronan Whitelock (planning) - for Hearing 9 – Renewable Electricity generation for the Proposed Kaipara District Plan – 20 March 2026

1. Kia ora, my name is Ronan Whitelock, and I am a Resource Management Planner from the Department of Conservation.
2. I can confirm I have read the Code of Conduct, I agree to comply with it, and I am here to impartially assist the panel on planning matters.
3. I have read other submitters' evidence for the Renewable Electricity Generation chapter.
4. In my primary and rebuttal evidence I recommended amendments to ensure the chapter gives better effect to the National Policy Statement for Renewable Electricity Generation, while also recognising and providing for section 6 of the RMA, and to ensure Council's s31(1)(b)(iii) RMA function is implemented appropriately.
5. I consider the approach taken in the REG chapter to give effect to the amended NPS-REG appropriate given the statutory planning framework, currently in force. However, I consider there are amendments required to ensure that the effects associated with REG activities do not adversely affect ecosystems and indigenous biodiversity.
6. The comments I provide below are the key matters of my primary and rebuttal evidence, where I consider issues remain unresolved. These include:
 - REG-P4
 - The Activity status for Rule REG-R8
 - Permitted thresholds of Rule REG-R9

REG-P4

7. At paragraph 31 of my primary evidence, I outline that REG-P4 requires amendments to ensure that Policy F of the NPS-REG is fully implemented, this includes expressly incorporating clause (2) which ensures that when s6 values are affected by a REG activity, their values must be assessed alongside other relevant parts of the plan. I consider this to be a more appropriate way of

directing assessment, in comparison to providing a comment within the overview to apply it where relevant.

8. Mr Wyeth says that introducing this type of direction would be inconsistent with other PDP chapters, such as the infrastructure chapter, which also requires consideration of overlay chapters in the PDP that manage environments and values provided for in section 6 of the RMA.
9. I do not agree with Mr Wyeth, I note the NPS-I has an equivalent policy to Policy F of the NPS-REG, being Policy 9. Both Clauses (2) of Policy F and 9 directs decision makers within the context of a district plan to require assessment on other parts of the plan. As such, I do not consider my recommendation is inconsistent with the Infrastructure Chapter, because National Direction requires the same thing.

REG-R8

10. I consider the appropriate activity status for this rule is a discretionary activity status. A discretionary activity allows assessment of all effects of the activity under s104B of the RMA and in doing so, enables an appropriately rigorous process to be applied for large scale activities. An RD activity limits assessment to listed matters, risking the exclusion of uncertain effects associated with large-scale REG activities.
11. As stated in paragraph [10] of my rebuttal evidence, I think there is a general level of alignment between Mr Badhams's evidence and my primary evidence, that a discretionary activity status provides the decision-maker with a robust and comprehensive framework to consider any adverse effects associated with the activity. I consider this view reinforces my recommendation that large scale activities can appropriately be provided for as a discretionary activity, as per the notified version of REG-R8.

REG-R9

12. I consider that my recommendations on REG-R9 will help ensure that the potential cumulative effects associated with upgrading, repowering or expanding existing buildings and structures such as solar panels, are managed. Currently the rule provides permitted activity status for any existing wind, solar,

hydro, or geothermal activity to expand in scale through the increase in height, and footprint.

13. For example, a plan user could incrementally upgrade or repower an existing REG activity, including its structures, by up to 25% across multiple stages without needing a resource consent. However, a plan user would require resource consent if they were to expand the existing structure by more than 25%, such as 26%. Hence, I consider a temporal threshold is prudent to manage any potential adverse cumulative effects.
14. The s42A addendum does not directly rebut my recommendation for a temporal threshold. It notes that the likelihood of frequent upgrading or repowering is low on the basis of economic feasibility. No technical evidence has been provided to support that position, and it is unclear whether it extends to all forms of REG, including solar and wind. From a planning perspective, this rule applies to existing solar and wind activities in line with the definition of repowering, and it also applies to upgrades, which broadens its relevance to other REG technologies such as hydro, or geothermal. Independent of any assumptions about economic feasibility, the rule enables up to a 25% increase in the footprint or height of structures as a permitted activity. This creates the potential for incremental changes over time that may generate potential adverse effects, including cumulative effects, without any assessment trigger. In my view, a temporal threshold would provide a more appropriate framework for managing these potential effects.
15. I am happy to answer any questions the Panel has. Thank you for your time.