

**Before the Wellington City Council Proposed District Plan Hearings
Panel**

Under the Resource Management Act 1991 (the Act)

In the matter of the Wellington City Council Proposed District Plan–
Hearing Stream 9

Infrastructure and Risks

Infrastructure - all chapters (INF)

Transport (TR)

Renewable Energy (REG)

Contaminated Land (CL)

Hazardous Substances (HS)

Between **Wellington City Council**
Local authority

And **Transpower New Zealand Limited**
Submitter 315 and Further Submitter FS29

**Statement of evidence of Pauline Mary Whitney for Transpower New
Zealand Limited**

Dated 27 May 2024

1 Executive Summary

- 1.1. As outlined in my Hearing Stream 1 Evidence, Transpower owns and operates the National Grid, which transmits electricity throughout New Zealand from energy generation sources to distribution networks and direct-connect customers. The need to operate, maintain, develop and upgrade the electricity transmission network is recognised as a matter of national significance through the National Policy Statement on Electricity Transmission 2008 ('NPSET').
- 1.2. Transpower's submission on the Wellington City Proposed District Plan ("PDP") was extensive. Transpower's submission has been heard across multiple hearings and therefore Transpower requests the panel refer to the Transpower evidence to Hearing Stream 1 and Hearing Stream 5 in considering the submission points relevant to Hearing Stream 9. For the sake of efficiency, the background, and planning contextual information will not be repeated.
- 1.3. Specific to Hearing Stream 9, Transpower lodged a significant number of submission points relating to the Infrastructure provisions. It should be noted the rule framework relating to subdivision and earthworks (as it relates to the effects of such activities on Infrastructure and specifically the National Grid) were addressed at Hearing Stream 5.
- 1.4. At a broad level in its submission Transpower queried the number of Infrastructure sub chapters, policies and rules relating to Infrastructure and specifically the National Grid, and yet it was considered the NPSET was not given effect too. The myriad of provisions was considered confusing and creates the potential for contradiction or inconsistency between provisions.
- 1.5. The Section 42A reports recommends substantive changes to the policy and rule framework for the National Grid in terms of the creation of a National Grid Infrastructure sub chapter which contains the policy framework as it relates to the National Grid, and rules relating to the National Grid within the Coastal Environment and Natural Features and Landscapes overlays, as well as a specific rule and standard that applies to proposed activities within the defined National Grid Yard. Rules outside the aforementioned overlays are contained within the Infrastructure chapter (and also within the Infrastructure Natural Hazards and Other Overlays sub chapters where applicable).
- 1.6. I generally support the recommended structural approach and the specific policy and rule recommendations in principle. My evidence therefore focuses on refinements to

specific provisions, including relief sought in the submission and which have been accepted by the reporting officer in the S42A Reports but have not been carried through into the revised PDP chapters. Within this context, my evidence addresses the recommended provisions under the following seven topics, with a brief outline of the outstanding relief sought in this evidence as follows:

- **1. Creation of a National Grid Infrastructure Subchapter:** Generally support the provision of a new sub chapter but to assist plan users in navigating the relationship between the chapters and specific provisions, I would support inclusion of explanatory text within the Introduction section of the Infrastructure (General) Chapter
- **2. Definitions and mapping:** Although not addressed in the S42A Report, I support the relief sought in the submission to amend the definitions of National Grid Subdivision Corridor and National Grid Yard to reflect the assets within the city. The officer has recommended mapping of the National Grid Subdivision Corridor and National Grid Yard on the planning maps, an approach which I do not support. Instead, I support the notified PDP approach to define the National Grid as a line with the yard and corridor width to be determined through the definitions.
- **3. Infrastructure Chapter:** The provisions are supported with the only outstanding changes sought being cross reference to the National Grid specific policies within the matters of discretion.
- **4. Infrastructure – National Grid Sub Chapter.** The Sub Chapter provides a specific suite of objectives and policies that apply to the National Grid (both in terms of effects on and of the National Grid), as well as a specific National Grid Yard rule, and rules that apply to National Grid activities within the Coastal Environment and Natural Features and Landscapes overlays. Notwithstanding the general support, amendments are sought as follows:
 - A minor change to P58 to refer to assets rather than resources
 - Amendment to P59 to reflect NPSET Policy 3 and Policy 5
 - Deletion of P60 as it appears a duplication of P58
 - Retention of P61
 - Amendment to P62 to reflect NPSET Policy 3

- Amendment to P63 to confine the policy to development and give effect to NPSET policies 3 and 4
 - Insertion of two new rules for new assets within the Natural Features and Landscapes overlays, and provision of a restricted discretionary and discretionary (rather than the notified discretionary and non complying) activity status
 - Amendment to Rule R58 and standard S18 to reflect that sought in the submission and accepted in the S42A report
 - Minor cross referencing corrections within R61 and R65.
 - Amendment to R62 to change the activity status from permitted to restricted discretionary.
- **5. Infrastructure – Coastal Environment Sub Chapter and Natural Features and Landscapes Sub Chapter:** On the basis of the officer recommended Infrastructure - National Grid Sub Chapter, the Infrastructure – sub chapters for Coastal Environment, and Natural Features and Landscapes would not be applicable to the National Grid, and I accept the recommendations on the provisions.
 - **6. Infrastructure – Natural Hazards Sub Chapter** The provisions are supported with the only outstanding changes sought being cross reference to the National Grid specific policies within the matters of discretion.
 - **7. Infrastructure – Other Overlays Sub Chapter:** The provisions are supported with the only outstanding changes sought being cross reference to the National Grid specific policies within the matters of discretion.
- 1.7. Attached as Appendix A is the National Policy Statement on Electricity Transmission 2008. Attached as Appendix B are some screenshots from the PDP planning maps of the National Grid assets and corresponding overlays within the city. Attached as Appendix C to my evidence is a table outlining all the submission points relevant to Hearing Stream 9.

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2. Qualifications and Experience

- 2.1. My full name is Pauline Mary Whitney.
- 2.2. For my qualifications and experience and other introductory comments, please refer to paragraphs 2.1 – 2.8 of my statement of evidence for Hearing Stream 1 (“Hearing 1 Evidence”), dated 7 February 2023.
- 2.3. I have read the Code of Conduct for Expert Witnesses contained in Section 9 of the Environment Court Consolidated Practice Note (2023), and I agree to comply with it.

3. Scope of Evidence

- 3.1. My evidence will address the following:
 - 3.1.1. A brief outline of the National Grid Framework and Transpower’s interests in Hearing Stream 9; and
 - 3.1.2. Responses to the officer recommendations, focusing on the amendments I support in this evidence.

4. The National Grid Policy Framework

- 4.1. As outlined in my Hearing 1 Evidence, Transpower owns and operates the National Grid, which transmits electricity throughout New Zealand from energy generation sources to distribution networks and direct-connect customers. The need to operate, maintain, develop and upgrade the electricity transmission network is recognised as a matter of national significance through the National Policy Statement on Electricity Transmission 2008 (‘NPSET’). This significance applies universally across the country regardless of the nature of the specific National Grid asset.
- 4.2. In my Hearing 1 evidence I outlined the three broad aspects to the NPSET which must be given effect to in local authority policies and plans, being:
 - Enabling the National Grid,
 - Managing the effects of the National Grid; and
 - Managing the effects on the National Grid.
- 4.3. My earlier evidence stands and is applicable to this hearing.

4.4. I also confirm the assessment within the Hearing Stream 1 evidence relating to the Wellington Regional Policy Statement stands with no decisions yet released on Proposed Change 1.

5. National Grid assets within Wellington City

5.1. As outlined in the Transpower submission, the National Grid assets within Wellington City are a crucial component of the linear grid network. In essence, Wellington acts as the corridor that allows for the transmission of electricity from the south to the north of the country.

5.2. In terms of Hearing Stream 9 Overlay Topics¹ (noting Significant Natural Areas are to be addressed at a later hearing), there are numerous existing National Grid assets within the overlays.

5.3. Within the Coastal Environment overlay, assets include the Kaiwharawhara Supply Point substation (designation TPR6) and underground cable, Oteranga Bay (designation TPR4) and associated lines, and Te Hikowhenua Shore Electrode Station (designation TPR5) and associated lines. Both the Oteranga Bay (designation TPR4) and Te Hikowhenua Shore Electrode Station (designation TPR5) are within areas of “High Coastal Natural Character” noting there are no existing assets within the identified “High Coastal Natural Character” that are not designated. Transpower has no existing assets in area of “Very High Coastal Natural Character”.

5.4. Within the Natural Features and Landscapes overlay, existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay, noting that while some of the assets are within the Oteranga Bay designation TPR4, others are not), and numerous Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city.

6. Summary of Hearing Stream 9 Submission Points

6.1. The submission points lodged by Transpower to Hearing Stream 9 were extensive (reflecting the concerns with the PDP as notified) and are summarised under the following PDP chapter (and sub chapter) headings as follows:

- Definitions

¹ Coastal Environment Overlay, Outstanding Natural Features and Landscapes Overlay, Special Amenity Landscapes, and Ridgelines and Hilltops Overlay

- Infrastructure Chapter
- Infrastructure – Coastal Environment Sub Chapter
- Infrastructure – Natural Features and Landscapes Sub Chapter
- Infrastructure - Natural Hazards Sub Chapter
- Infrastructure – Ecosystems and Indigenous Biodiversity Sub Chapter (noting these are not addressed in this evidence given the decision to defer the Indigenous Biodiversity provisions hearing).

Definitions

- 6.1.1. The notified definitions were largely supported, with confined amendments sought to the definition of National Grid Yard and National Grid Subdivision Corridor to reflect two unique National Grid assets within the city, and that the definition of Coastal Margin be amended to provide certainty as to the area to which the definition applies.

Infrastructure Chapter

- 6.1.2. As a general comment, Transpower queried the number of Infrastructure sub chapters, policies (62) and rules relating to Infrastructure and specifically the National Grid. The myriad of provisions was considered confusing and creates the potential for contradiction or inconsistency between provisions (particularly as they may evolve through the PDP process).
- 6.1.3. It was noted there are no National Grid specific policies within the infrastructure subchapter. However, there are 18 policies within other sub chapters specific to managing the effects of the National Grid, as follows:
- Five within the Infrastructure – Coastal Environment Chapter (INF-CE P26, P27, P28, P31, P32)
 - Three within the Infrastructure – Ecosystems and Indigenous Biodiversity Chapter (INF-ECO P35, P36, P37)
 - Ten within the Infrastructure – Natural Features and Landscape Chapter (INF-NFL P51 – P60)
- 6.1.4. As such, there are no National Grid specific policies in the plan that specifically recognise the benefits of the National Grid or management of the effects of subdivision, land use and development on the National Grid. Transpower considered the lack of recognition within the general

infrastructure chapter does not give effect to the NPSET, and the provision of 18 other National Grid specific policies excessive given they do not give effect to the NPSET. Given the national significance of the National Grid and that this significance is recognised in the NPSET, in its submission Transpower sought a separate set of provisions within the infrastructure section.

- 6.1.5. The policy relating to the effects of activities on infrastructure (INF-P7) is general in nature and insufficiently directive to give effect the NPSET. Clause 1. of the policy is limited to subdivision, ignoring that land use and other development activities (such as earthworks) can compromise the National Grid. Clause 4. is general in nature and insufficiently directive to give effect to Policies 10 and 11 of the NPSET.
- 6.1.6. Transpower also notes that the majority of the above identified 18 policies in the sub chapters apply to the National Grid and the Gas Transmission Pipeline Corridor. Notwithstanding the significance and importance of the Gas Transmission Pipeline Corridor, Transpower sought standalone policies specific to the National Grid in order to give effect to the NPSET, noting the Gas Corridor does not have the higher order policy support of an NPS.
- 6.1.7. Specific to the rules, there are rules relating to the operation, maintenance and upgrade of existing National Grid assets. Given existing assets are regulated by the NESETA, Transpower did not support the duplication of rules in the PDP. The purpose of the NESETA is to provide a complete and nationally consistent regulatory framework for existing National Grid assets. The inclusion of rules for existing assets (covered by the NESETA) in the PDP is confusing and, in some instances, inconsistent with the NESETA. The provisions could lead to plan interpretation and application issues, as well as constituting a degree of 'duplication' and/or 'conflict' that is at odds with section 44A RMA.
- 6.1.8. The notified rule INF-R22 and standard INF-S12 relating to activities within the National Grid Yard were generally accepted, with refinements sought.
- 6.1.9. Included in the submission was specific relief sought. Transpower's preference was for a separate suite of National Grid provisions policies and rules within a separate Infrastructure sub-chapter and that all rules relating

to existing National Grid assets should be removed (as these are regulated by the NESETA).

Infrastructure – Coastal Environment Sub Chapter

- 6.1.10. Specific to the Infrastructure - Coastal Environment sub chapter, as outlined in paragraph 5.3 Transpower has existing assets within the coastal environment, including assets within areas of “High Coastal Natural Character”. Transpower has no existing assets in area of “Very High Coastal Natural Character”. In its submission Transpower sought amendment to policies INF-CE-P28 and INF-CE-P31 relating to the upgrade and development of the National Grid on the basis of concerns the policies as proposed do not give effect to the NPSET and impose requirements that go beyond the NPSET.
- 6.1.11. Reference to the National Grid was sought to be deleted from the applicable operation, maintenance and upgrade rules given the NESETA regulates such activities.

Infrastructure – Natural Features and Landscapes Sub Chapter

- 6.1.12. Specific to Infrastructure - Natural Features and Landscapes sub chapter, existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay) Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city. In addition to the number of National Grid policies within the sub chapter (some of which are not applicable to the National Grid given the matters they relate to), Transpower raised a number of concerns that the policies do not give effect to the NPSET.
- 6.1.13. Reference to the National Grid was sought to be deleted from the operation, maintenance and upgrade rules given the NESETA regulates such activities, and the non-complying activity status for new assets was opposed.

Infrastructure - Natural Hazards Sub Chapter

- 6.1.14. Specific to Infrastructure - Natural Hazards, given the linear nature of the National Grid and locational constraints, while Transpower would endeavour to avoid hazard areas, this may not always be possible. In its submission, Transpower supported the rule and policy framework.

7. Response to the Section 42A Report Recommendations

- 7.1. The following section responds to the Hearing Stream 9 S42A Report recommendations on Transpower's submission points.
- 7.2. For clarity, attached as **Appendix C** is a table outlining all the submission points relevant to Hearing Stream 9.
- 7.3. The reporting officer has recommended substantive changes to the policy and rule framework for the National Grid in terms of the creation of a National Grid infrastructure sub chapter which contains:
 - a. the policy framework as it relates to the National Grid
 - b. rules relating to the National Grid within overlays², and
 - c. specific rules that apply to proposed activities within the defined National Grid Yard³.
- 7.4. National Grid applicable rules outside the Coastal Environment and Natural Features overlays are contained within the Infrastructure chapter (and also within the *Natural Hazards* and *Other Overlays* sub chapters where applicable).
- 7.5. I generally support the recommended structural approach and therefore within this context, my evidence addresses the recommended provisions under the following topics:
 - a. Creation of a National Grid Infrastructure Subchapter
 - b. Definitions and mapping
 - c. Infrastructure Chapter
 - d. Infrastructure – National Grid (“NG”) Sub Chapter
 - e. Infrastructure – Coastal Environment (“CE”) Sub Chapter
 - f. Infrastructure – Natural Features and Landscapes (“NFL”) Sub Chapter

² Being the Coastal Environment Overlay, and the natural features overlays being Outstanding Natural Features and Landscapes Overlay, Special Amenity Landscapes Overlay and the Ridgelines and Hilltops Overlay.

³ Noting earthworks within the National Grid Yard are addressed in the

g. Infrastructure - Natural Hazards Sub Chapter

7.6. In terms of outstanding matters, these are confined to corrections/matters of clarification as opposed to substantive changes or areas of disagreement.

Creation of a National Grid Infrastructure Subchapter

7.7. In its submission Transpower raised concerns with the structure and content of the Infrastructure provisions in terms of the myriad of infrastructure provisions both at a general level and also at the sub chapter level. Specific to the National Grid, there are no National Grid specific policies in the plan that specifically recognise the benefits of the National Grid or management of the effects of subdivision, land use and development on the National Grid. While there are 18 National Grid policies within other sub chapters (being the CE, NFL and Indigenous Biodiversity Infrastructure Sub chapters), these only relate to managing the effects of the National Grid.

7.8. I agree with Transpower that the lack of recognition within the general Infrastructure chapter does not give effect to the NPSET.

7.9. Within the above context, I largely support the provision of a NG sub chapter as recommended by the reporting officer.

7.10. In considering the appropriateness of a NG sub chapter, I am cognisant of the relationship between the (general) Infrastructure chapter and the Infrastructure sub chapters. This relationship is in part clarified in the introduction to the Infrastructure chapter which provides:

The provisions of the overlay sub-chapters apply in addition to the provisions of this chapter. In the case of conflict with any provisions of this chapter and a sub-chapter, the provisions of the sub-chapter will prevail.

7.11. The relationship between the Infrastructure (and sub) chapters and other provisions in the PDP is also clarified in the Introduction⁴. While the text refers to rules, the

⁴ *The provisions within this chapter apply on a City-wide basis. As such the rules in the zone chapters and earthworks chapter do not apply to infrastructure unless specifically stated within an infrastructure rule or standard. Likewise, the rules in the overlay chapters do not apply to infrastructure.*

Instead, infrastructure subchapters address the requirements particular to the overlays as follows:

- INF-CE (Coastal Environment and Natural Character);
- INF-ECO (Significant Natural Areas);
- INF-NFL (Outstanding Natural Landscapes, Outstanding Natural Features, Special Amenity Landscapes, Ridgelines and Hilltops);
- INF-NH (Natural Hazards); and
- INF-OL (Other Overlays).

relationship is further clarified in the Coastal Environment (“CE”) Overlay chapter and the Natural Features and Landscapes (“NFL”) overlay chapter as follows:

Provisions relating to infrastructure within the coastal environment are located in the INF-CE sub-chapter and in the Special Purpose Port Zone and Airport Zone. The provisions in the INF-CE sub-chapter apply in addition to the general provisions of the infrastructure chapter.

Infrastructure - Natural Features and Landscapes - Policies and Rules relating to Infrastructure in Outstanding Natural Features and Landscapes, and Special Amenity Landscapes, and Ridgelines and Hilltops are located in the Infrastructure - Natural Features and Landscapes Chapter

7.12. I will delve into the specifics of the provisions within the officer recommended NG sub chapter later in my evidence but in principle I support the approach that provides a specific suite of objectives and policies that apply to the National Grid (both in terms of effects on and of the National Grid) as well as specific rules that apply to proposed activities within the defined National Grid Yard, and National Grid activities within the CE and NFL overlays.

7.13. Outside the CE and NFL overlays, there are general rules in the Infrastructure chapter that will also apply, and by default, policies and rules within the Infrastructure – Natural Hazards sub chapter, and Infrastructure – Other overlays sub chapter.

7.14. The table below conveys my understanding of the relationship and application of provisions between the various Infrastructure chapters.

	Applicability to the National Grid		
PDP Chapter	Objectives	Policies	Rules
Infrastructure Chapter	✓ Applicable to the National Grid with specific provisions in the NG chapter to prevail in any conflict	✓ Applicable to the National Grid with specific provisions in the NG chapter to prevail in any conflict	✓ Applicable rules are those relating to development (as development is not covered by the NESETA) outside CE and NFL overlays.
INF - National Grid	✓ Applicable to the National Grid	✓ Applicable to the National Grid	✓ Applicable rules are those relating to development (as development is not covered by the NESETA) inside CE and NFL overlays, and third party activities in the National Grid Yard. Rules are also provided for operation, maintenance and upgrade for any new activities not regulated by the NESETA.

INF - Coastal Environment	N/A as none in the chapter	✗ N/A as the NG sub chapter provides specific polices for the National Grid in the CE	✗ N/A as the NG sub chapter provides specific rules for the National Grid.
INF - Natural Features and Landscapes	N/A as none in the chapter	✗ N/A as the NG sub chapter provides specific polices for the National Grid in the NFL overlays	✗ N/A as the NG sub chapter provides specific rules for the National Grid.
INF - Natural Hazards	N/A as none in the chapter	✓ Applicable to the National Grid	✓ Applicable rules are those relating to development of the National Grid (as development is not covered by the NESETA) inside hazard overlays.
INF - Other Overlays	N/A as none in the chapter	✓ Applicable to the National Grid	✓ Applicable rules are those relating to development of the National Grid (as development is not covered by the NESETA) inside the other defined overlays)

7.15. To assist plan users in navigating the relationship between and applicability of the specific provisions, I would support inclusion of the following text within the Introduction section of the Infrastructure – National Grid sub chapter (refer blue text):

The Infrastructure – National Grid sub chapter provides a specific policy framework for the National Grid, and specific rules for activities within the National Grid Yard, and new National Grid Infrastructure within the Coastal Environment overlay, Outstanding Natural Features and Landscapes overlay, Special Amenity Landscapes overlay and Hilltops and Ridgelines overlay. For activities outside these specific overlays, in addition to the policies in the Infrastructure National Grid sub chapter, the Infrastructure chapter applies, as do the Infrastructure - Natural Hazards sub chapter and the Infrastructure – Other Overlays sub chapter.

Definitions and mapping

7.16. In its submission Transpower sought relief on three specific National Grid definitions (being to retain the definition of National Grid, and amend the definitions of National Grid Subdivision Corridor and National Grid Yard to reflect the assets within the city).

7.17. The above submission points have not been specifically addressed in the S42A Report, rather the officer recommends⁵ mapping of the National Grid Subdivision

⁵ Section 42A Report: Infrastructure Part 1. Paragraphs 146 – 147.

Corridor and National Grid Yard on the planning maps. The reporting officer has requested Transpower provide information to inform the mapping (given the variation in setback distances depending on asset type) and this mapping would then inform an overlay. The recommendation is made in context of the provision of a National Grid sub chapter.

- 7.18. I am not clear as to the relationship of mapping to the provision of a National Grid sub chapter as in my opinion one is not reliant on the other. Consistent with the approach in other district plans across New Zealand, the extent and area covered by the National Grid Yard and National Grid Subdivision Corridor are defined in the definitions. The centreline (which forms the basis of the defined setbacks) is identified on the PDP planning maps as 'National Grid Transmission Lines', as opposed to the specific yard and corridors being identified. Refer Figure 1 below.

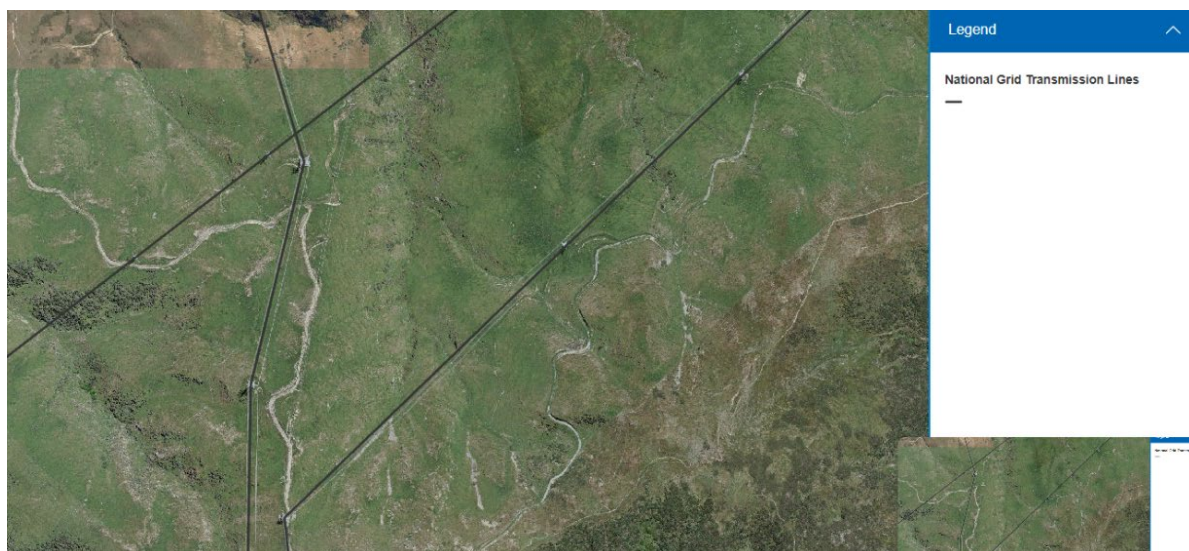


Figure 1. National Grid Transmission Lines as shown on PDP planning maps

- 7.19. While I appreciate spatial mapping of the National Grid Yard and National Grid Subdivision Corridor may assist plan users in determining whether they are subject to the National Grid rules, I have the following concerns with the mapping and instead support retention of the approach in the PDP which is to map the centreline of the National Grid lines to assist plan users but rely on the definitions to define where the yard and corridor apply, including the width (which I note do not rely on the planning maps). My concerns with spatial mapping are as follows:

- There are instances where assets (such as a pole or tower) may change in location if they are upgraded. Reliance on mapped areas would technically require a plan change to amend the district plan mapping.

- The mapping of the National Grid line (as opposed to the yard and corridor) is consistent with the mapping standard (and specifically the symbol representation) approach in the National Planning Standards.
- Given the extent of assets in the city and the ability in an e-plan for maps to be viewed at a small scale, there is always the potential for errors in the mapping. This occurred within Hamilton City and the council had to undertake a plan change to amend the mapping.
- While best endeavours are made to ensure accuracy, the mapping cannot always be relied on. An example is provided below in Crofton Downs, refer Figure 2. in that the National Grid transmission line does not appear to be centred and therefore it would erroneous to rely on a mapped a yard/corridor. The NPSET (and PDP) applies a very rigorous policy and rule framework within residential area for sensitive activities in the National Grid Yard and I have concerns about mapped areas being relied on as a trigger for the restrictive plan provisions.



Figure 2. PDP mapping of the National Grid Transmission Lines within Crofton Downs.

7.20. While not the preferred approach, should the panel be minded to map the yard and corridor as recommended by the reporting officer, the areas should be clearly shown as being indicative only (for information purposes) and plan users should rely on the definitions within the PDP and contact Transpower to determine if they are subject to the National Grid rules.

- 7.21. In terms of the amendments sought to the definition for National Grid Yard and National Grid Subdivision Corridor, I support the relief sought in the Transpower submission as they reflect the assets within the city. The relief sought is as follows (refer blue text):

NATIONAL GRID SUBDIVISION CORRIDOR

~~National Grid Subdivision Corridor~~ means, as depicted in Diagram 1, the area measured either side of the centre line of any above ground National Grid transmission lines as follows:

- a. 14m of a 110kV transmission line on single poles or a cable;
- b. 16m of a 110kV transmission line on pi poles;
- c. 16m of the Te Hikowhenua - Deviation A (THW-DEV-A) transmission line on towers and Pi poles;
- d. 18m of the South Makara - Oteranga Bay A (SMK-OTB-A) 11kV transmission line on Single Poles;
- ~~ee.~~ 32m of a transmission line up to and including 110kV, on towers;
- ~~ef.~~ 37m of a 220kV transmission line;
- ~~eg.~~ 39m ~~of~~ of a 350kV National Grid transmission lines on towers.

The measurement at setback distances from National Grid transmission lines shall be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.

Note: the National Grid Corridor does not apply to underground cables or any transmission lines (or sections of line) that are designated.

NATIONAL GRID YARD

means, as depicted in Diagram 1:

- a. the area located within ~~120~~10m of either side of the centreline of an above ground ~~110kV electricity~~ transmission line up to and including 110kv on single poles, or a cable;
- b. the area located within 10m of either side of the centreline of the Te Hikowhenua - Deviation A (THW-DEV-A) - Single Circuit transmission line on towers and Pi poles;
- ~~bc.~~ the area located within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is up to 110kV or greater;
- ~~ed.~~ the area located within 12m in any direction from the outer visible edge of an electricity transmission support structure pole or tower foundation, associated with a line which is up to 110kV or greater.

The measurement of setback distances from National Grid transmission lines must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.

Note: the National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.

Infrastructure Chapter

- 7.22. In its submission Transpower sought relief relating to objectives INF-O1 - O3 and policies INF-P1, P3, P4, P5, P6, and P7. On the basis of the officer recommended Infrastructure - National Grid Sub Chapter, I accept the recommendations on the above provisions.
- 7.23. In relation to rules, in its submission Transpower submitted on INF-R1, R2, R3, R4, R6, R7, R10, R15, R16, R22, and Standards INF-S1, S2, S3, S4, S6, S7, and S12. Specific comments on the rules and standards are as follows:
- 7.23.1. Given the National Environmental Standards for Electricity Transmission 2009 ("NESETA") regulates existing National Grid assets within the city, including their upgrade, the general infrastructure rules INF-R1, R3 and R6 are not relevant to the National Grid. However I am not opposed to their general application to the National Grid for the operation, maintenance and upgrade of any new assets that are not regulated by the NESETA.
- 7.23.2. The relocation of the National Grid Yard specific Rule INF-R22 and standard INF-S12 into the Infrastructure - National Grid Sub Chapter is supported.
- 7.23.3. The retention of standards INF-S1, S2, S3, S4, S6, and S7 are supported.
- 7.23.4. The following rules which would apply to new National Grid assets are supported, as is the default activity status: Rules INF-R2 (underground of infrastructure), INF-R4 (new vehicle access tracks), INF-R7 (Structures), INF-R10 (New overhead lines less than 110kv), INF-R15 (default rule), and INF-R13 (new lines of 110kV or above).
- 7.23.5. However, the Matters of discretion within rule INF-R2, R4, R7, R10, R15, and R16 are confined to polices within the Infrastructure chapter and do not

refer to policies within the Infrastructure - NG Sub Chapter. Given the sub chapter contains the specific policy framework for the National Grid and the policies apply both within and outside overlay area, I consider the Grid policies are also a relevant consideration and should be included in the matters of discretion.

- 7.23.6. Based on the above, I would support reference to INF-NG-P58, P62 and P63⁶ within the above listed rules, as follows (amendments recommended in the S42A report and which I support are shown as red text. Further amendments supported through this evidence are shown as blue text):

INF-R2 New underground infrastructure (including customer connections), and upgrading of existing underground infrastructure

... Matters of discretion are:

1. The matters set out in INF-P1, INF-P3, INF-P4, INF-P5 and INF-P~~1243~~, and specific to the National Grid, INF-NG-P58, INF-NG-P62 and INF-NG-P63.

INF-R4 New vehicle access tracks for infrastructure

... Matters of discretion are:

1. The matters set out in INF-P1, INF-P2, INF-P5, INF-P6 and INF-P~~1243~~, and specific to the National Grid, INF-NG-P58 and INF-NG-P63.

INF-R7 Structures associated with infrastructure including:

1. Substations (including switching stations);
2. Transformers;
3. Gas transmission and distribution structures;
4. Energy storage batteries not enclosed by a building; **and**
5. Communications kiosks.; **and**
6. **Bus Shelters.**

... Matters of discretion are:

1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard; and
2. The matters set out in INF-P1, INF-P2, INF-P3, INF-P5 INF-P6 and INF-P~~1243~~, and specific to the National Grid, INF-NG-P58 and INF-NG-P63.

⁶ Noting I have not suggested reference to INF-NG-P60 as later in my evidence I suggest the policy be deleted as it duplicates INF-NG-P58.

INF-R10 New overhead lines and associated support structures that convey telecommunications or electricity below 110kV

... Matters of discretion are:

1. The matters set out in INF-P1, INF-P2, INF-P5, INF-P6 and INF-P1243., [and specific to the National Grid, INF-NG-P58 and INF-NG-P63.](#)

INF-R15 Infrastructure buildings and structures not provided for by any other rule in this table

... Matters of discretion are:

1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard; and
2. The matters set out in INF-P1, INF-P2, INF-P3, INF-P5, INF-P6 and INF-P1243., [and specific to the National Grid, INF-NG-P58, INF-NG-P62 and INF-NG-P63.](#)

INF-R16 New electricity lines and associated support structures (including poles and towers) that convey electricity of 110kV or above

... Matters of discretion are:

1. The matters set out in INF-P1, INF-P2, INF-P3, INF-P5, INF-P6 and INF-P1243., [and specific to the National Grid INF-NG-P58, and INF-NG-P63.](#)

Infrastructure - National Grid Sub Chapter

7.24. As conveyed in earlier comments, my understanding is the Infrastructure - NG Sub Chapter provides a specific suite of objectives and policies that apply to the National Grid (both in terms of effects on and of the National Grid), as well as specific rules that apply to proposed activities within the defined National Grid Yard, and National Grid activities within the CE and NFL overlays. Outside the CE and NFL overlays, there are general rules in the Infrastructure chapter that will also apply, and by default, policies and rules within the Infrastructure – Natural Hazards sub chapter, and Infrastructure – Other overlays sub chapter that will also apply.

7.25. The following commentary relates to specific provisions within the NG sub chapter.

Objectives

- 7.26. I support the officer recommended new objective **INF-NG-O7**⁷ which is specific to the National Grid. The objective differs from those in the Infrastructure chapter in terms of the more directive language which gives effect to the NPSET.

Policies

- 7.27. Six policies are recommended in the sub chapter. My response to these is as follows:

- 7.27.1. **INF-NG-P58**: The recommended policy gives effect to NPSET policies 1, 2 and 5, and reflects that sought in the Transpower submission. My only suggestion on further reflection of the policy wording would be to change the word 'resources' to 'assets' (to better reflect the terminology used in the NPSET) as follows (refer [blue](#) text):

NF-NG-P58 Benefits of the National Grid

Recognise and provide for the benefits of the National Grid by enabling the operation, maintenance and upgrade of the existing National Grid and the establishment of new electricity transmission ~~resources~~ assets.

- 7.27.1. **INF-NG-P59**⁸: The recommended policy gives effect to NPSET policies 2 and 5. While the subject matter may arguably be addressed in INF-P1, for completeness I support the provision of a specific policy for existing assets within the sub chapter. I also note INF-P1 is confined to benefits.

- 7.27.2. However, while P59 is supported, in order to give effect to Policy 3 of the NPSET and the relief sought in the Transpower submission for a general National Grid policy⁹, I would support amendment to the policy to also refer to constraints. I would also support (as sought in the Transpower submission) replacement of the word 'Provide' with 'Enable' to reflect the directive wording within NPSET Policy 5 (which is specific to operation,

⁷ NF-NG-O7 The National Grid

The national significance and benefits of the National Grid are recognised, and the National Grid is protected and provided for.

⁸ INF-NG-P59 Operation, and maintenance and minor upgrade of the National Grid

Provide for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities.

⁹ Submission point 315.51 -Add a new National Grid specific policy as follows:

INF-NG-P3 Maintenance, operation, upgrading and development of the National Grid Enable the operation, maintenance, upgrading and development of the National Grid, recognising its operational, functional and technical constraints, the complexity of the interconnectedness of networks, and its role in servicing existing and planned development.

maintenance and minor upgrades). The amended wording would also be consistent with the Infrastructure Chapter INF-P1, clause a¹⁰. The relief sought to P59 is as follows (refer blue text):

NF-NG-P59 Operation, and maintenance and minor upgrade of the National Grid
Provide Enable for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities, recognising its operational, functional and technical constraints.

7.27.3. As an alternative to the constraints amendment sought above, I would support the provision of new policy as sought in Transpower submission point 315.51⁹ which the officer accepts in paragraph 423 of the Section 42 A report (Part A) but is not reflected in the recommended National Grid sub chapter.

7.27.4. **INF-NG-P60¹¹**: The recommended policy gives effect to NPSET policies 1, 2 and 5 and is therefore supported in principle. However while the title differs, the substance of the policy appears to duplicate recommended policy INF-NG-P58 and therefore I do not consider the policy necessary and would support its removal and reliance instead on INF-NG-P58.

INF-NG-P60 Upgrading and development of the National Grid
Recognise and provide for the benefits of the National Grid by enabling the operation, maintenance and upgrade of the existing National Grid and the establishment of new electricity transmission resources.

7.27.5. **INF-NG-P61**: Policy P61 relates to adverse effects on the National Grid, with the policy applying to activities within the (defined) National Grid Yard and National Grid Subdivision Corridor. The recommended policy reflects that sought by Transpower in its submission. I support the provision of the specific policy as I share the concerns outlined in the Transpower submission relating to the general nature of INF-P7 and that it does not

¹⁰ **INF-P1 Recognising and providing for infrastructure**

Recognise the benefits of infrastructure by:

1. Enabling the safe, resilient, effective and efficient operation, maintenance, repair, minor upgrade or removal of existing infrastructure;
2. Enabling investigation, monitoring and navigation activities associated with infrastructure operations;
3. Providing for significant upgrades to, and the development of new infrastructure; and
4. Providing for the functions and responsibilities of infrastructure as lifeline utilities during an emergency.

¹¹ **INF-NG-P60 Upgrading and development of the National Grid**

Recognise and provide for the benefits of the National Grid by enabling the operation, maintenance and upgrade of the existing National Grid and the establishment of new electricity transmission resources.

sufficiently give effect to the NPSET. In summary, in relation to the shortcomings of INF-P7:

- The policy title “Reverse sensitivity” only relates to one aspect of Policy 10 of the NPSET and fails to give effect to the second part of Policy 10 which is to ensure the Grid is not compromised by direct effects.
- The policy only applies to sensitive activities, ignoring other activities which may compromise the National Grid.
- Clause 1. of the policy is limited to subdivision, ignoring that land use and other development activities (such as earthworks) can compromise the National Grid.
- Clause 2. and 3. do not apply to the National Grid.
- Clause 4. is general in nature and insufficiently directive (in that it uses the word ‘manage’) to give effect the NPSET. There is no reference to sensitive activities, or to ensure the National Grid is not compromised.
- Earthworks are not referenced in the policy, noting there are specific earthworks rules in the PDP.

On this basis I support INF-NG-P61.

- 7.27.6. **INF-NG-P62:** The officer recommended policy INF-P62¹² relates to upgrading of the National Grid. While not specifically sought in the Transpower submission, the policy gives effect to the broader submission and relief sought for a suite of National Grid provisions. I generally support the policy on the basis that should consent be required under the NESETA for an upgrade to existing National Grid assets, the policy provides an appropriate policy framework. Notwithstanding the general support, I also support the insertion of reference to ‘technical requirements’ to give effect to the specific wording in NPSET policy 3. Should this relief not be agreeable

¹² **NF-NG-P62 Upgrading of the National Grid**

Provide for the upgrading of the National Grid while:

1. Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and remedy or mitigate any adverse effects from the upgrade which cannot be avoided;
2. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection when considering major upgrades;
3. Recognising the constraints arising from the operational need and functional need of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects;
4. Recognising the potential benefits of upgrades to the National Grid to people and communities; and
5. Where appropriate, major upgrades should be used as an opportunity to reduce existing adverse effects of the National Grid.

the panel, as an alternative I would support the insertion of a new policy to give effect to Transpower submission point 315.51 as recommended by the reporting officer and addressed in paragraph 7.27.2 above, (refer [blue](#) text):

NF-NG-P62 Upgrading of the National Grid

Provide for the upgrading of the National Grid while:

- 1. Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and remedy or mitigate any adverse effects from the upgrade which cannot be avoided;*
- 2. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection when considering major upgrades;*
- 3. Recognising the constraints arising from the operational need and functional need [and technical requirements](#) of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects;*
- 4. Recognising the potential benefits of upgrades to the National Grid to people and communities; and*
- 5. Where appropriate, major upgrades should be used as an opportunity to reduce existing adverse effects of the National Grid.*

7.27.7. **INF-NG-P63:** Policy P63 relates to development of the National Grid, and reflects the relief sought in the Transpower submission. I support the policy and consider it gives effect to the NPSET. While I support the general INF-P6 policy, I do not consider it sufficiently directive to give effect to the NPSET (specifically Policy 4 which relates to route, site and method section, and Policy 7 and Policy 8 which provide specific direction to managing the effects of the development of the National Grid). Furthermore, the recommended policy provides a specific policy directive and framework for the CE and NFL overlays (noting Indigenous Biodiversity is to be addressed at a later hearing/process) within clauses 2 and 3.

7.27.8. In my opinion, in order to give effect to the NPSET, the development of the National Grid must be managed to ensure the potential for adverse effects is appropriately managed while recognising the significance of the National

Grid and the constraints under which it operates. The NPSET requires the District Plan to include policies that:

- Allow for the consideration of the technical constraints and operational requirements under which the National Grid operates, for example the linear nature of the transmission lines.
- Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site and method selection.
- Ensure new planning and development seeks to avoid adverse effects on more sensitive areas.
- Policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and method selection process when considering the adverse effects of new National Grid infrastructure on the environment.

7.27.9. Should INF-NG-P63 not be included as recommended, the development of the National Grid would be subject to the policy directives within the CE and NFL Infrastructure sub chapters. In my opinion these sub chapter policies do not give effect to the NPSET. For example:

- INF-NFL-P39 directs to 'Allow' for infrastructure within Hilltops and Ridgelines subject to two matters. The first matter relating to compliance where the underlying rules would not be met.
- INF-NFL-P41 directs to 'Only allow' subject to four matters, the first three of which would potentially be difficult to achieve in terms of maintaining or restoring the values, and avoiding significant adverse effects.
- INF-NFL-P42 directs to 'Only allow' subject to three matters, the first two of which would potentially be difficult to achieve in terms of protecting the values, and avoiding significant adverse effects. It is also noted the policy applies outside the CE and yet imposes the NZCPS policy directive framework.
- INF-NFL-P43 imposes an avoid directive unless any adverse effects can be avoided.

- INF-CE-P24 provides an 'Allow' directive for the coastal environment where is it located outside high character areas and margins. While not relevant to Transpower given the National Grid sub chapter, I do question whether P24 gives effect to the NZCPS (policy 13(1)(b).
- INF-CE-P25 directs to 'Only allow' within the CE and coastal margins subject to three matters, the first two of which would potentially be difficult to achieve in terms of maintaining or restoring the values, and avoiding significant adverse effects.

7.27.10. Notwithstanding the support for the policy INF-NG-P63 as recommended, I would support the following amendments (refer [blue](#) text):

- Amendment to clause 4. to remove reference to "operation, maintenance and upgrade and major upgrade" to reflect that the policy applies to the development of the National Grid; and
- Amendment to clause 5. to apply the consideration of constraints and route, site and method selection to all the matters in policy P63. This would give effect to NPSET policies 3 and 4., noting that P63 applies to the development of the National Grid in all environments and therefore the application of NPSET Policies 3 and 4 should not be confined to overlay areas. I also support the insertion of reference to 'technical requirements' to give effect to the specific wording within NPSET policy 3. Should the relief relating to technical requirements not be agreeable the panel, as an alternative I would support the insertion of a new policy to give effect to Transpower submission point 315.51 as recommended by the reporting officer and addressed in paragraph 7.27.2 above.

INF-NG-P63 Development of the National Grid

.....

4. Remedy or mitigate any adverse effects from the ~~operation, maintenance, upgrade, major upgrade or~~ development of the National Grid which cannot be avoided, to the extent practicable; and

5. When considering the adverse effects in respect of 1-~~3~~4 above;

a. Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and

b. Consider the constraints arising from the operational needs or functional needs and technical constraints of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.

Rules

- 7.28. Eight rules and one standard are recommended by the reporting officer for inclusion within the NG sub chapter. One rule (and the associated standard) relates to activities within the defined National Grid Yard, with the remaining seven rules relating to National Grid activities within the CE overlay and/or the NFL overlays (being Outstanding Natural features and Landscapes, Special Amenity Landscapes, and Ridgelines and Hilltops). As noted earlier in this evidence, my understanding is that rules relating to the National Grid outside these overlays are provided in the 'general' Infrastructure chapter and where applicable, the Infrastructure – Natural Hazards subchapter and Infrastructure – Other Overlays sub chapter.
- 7.29. However, on the basis the Infrastructure National Grid sub chapter contains the relevant policy and rule framework for activities within the CE and NFL Infrastructure sub chapters, the rule framework in the National Grid chapter appears incomplete as it does not contain any rules for new National Grid assets within the NFL overlays (noting there are rules for existing and assets and upgrades). I suspect this is an oversight as the S42A Report (Part 2 – Sub chapters) provides the following recommendation at paragraph 254. “.. *amend INF-NFL-R53, INF-NFL-R54, INF-NFL-R56 and INF-NFL-R57 to recognise that the National Grid in the Natural Features and Landscapes is provided in the National Grid sub-chapter*”, and the amended provisions chapter shows the deletion of the National Grid from the development rules INF-NFL-R56 (renumbered as R47) and R57 (renumbered as R48).
- 7.30. In order to provide the complete set of rules within the NG sub chapter and give effect to the officer recommendation, I would support the insertion of two new rules (refer paragraph 7.33 below) within the NG sub chapter for new National Grid assets within NFL overlays. An amended activity status is also sought for the rules as outlined below.
- 7.31. I also note notified PDP rule INF-NFL-R57 (renumbered R48 in the recommendation) provides a non-complying activity for new National Grid and Gas Transmission assets within the ONFL overlay within the Coastal Environment. While the rule (as recommended to be amended by the reporting officer) no longer applies to the National Grid, the rule as it applies to the National Grid is recommended to be carried across to the National Grid sub chapter (but as mentioned above, does not appear in the recommended Appendix A7). The S42A report is silent on the activity status (noting the Transpower submission sought a discretionary activity status). I also note the notified rule INF-NFL-R57 is silent on SAL and Ridgeline and Hilltops overlays in the

Coastal Environment. It is not clear if this is a gap or if the activity is meant to be captured by notified rule INF-NFL-R57. In my opinion, clarity would assist with rule interpretation.

- 7.32. I do not support a non-complying activity status as it does not give effect to the NPSET, or give effect to the 'seek to avoid' policy directive within the PDP. The activity status fails to recognise the national significance of the National Grid and would be inconsistent with the activity status applied in district plans across the country. Within Wellington City a non-complying activity status would apply to key and essential new National Grid assets such as a new Cook Strait Cable, shown below in Figure 3. For a regional context I also note the Wellington Natural Resources Plan affords a discretionary activity status¹³ for new cables at Oteranga Bay.

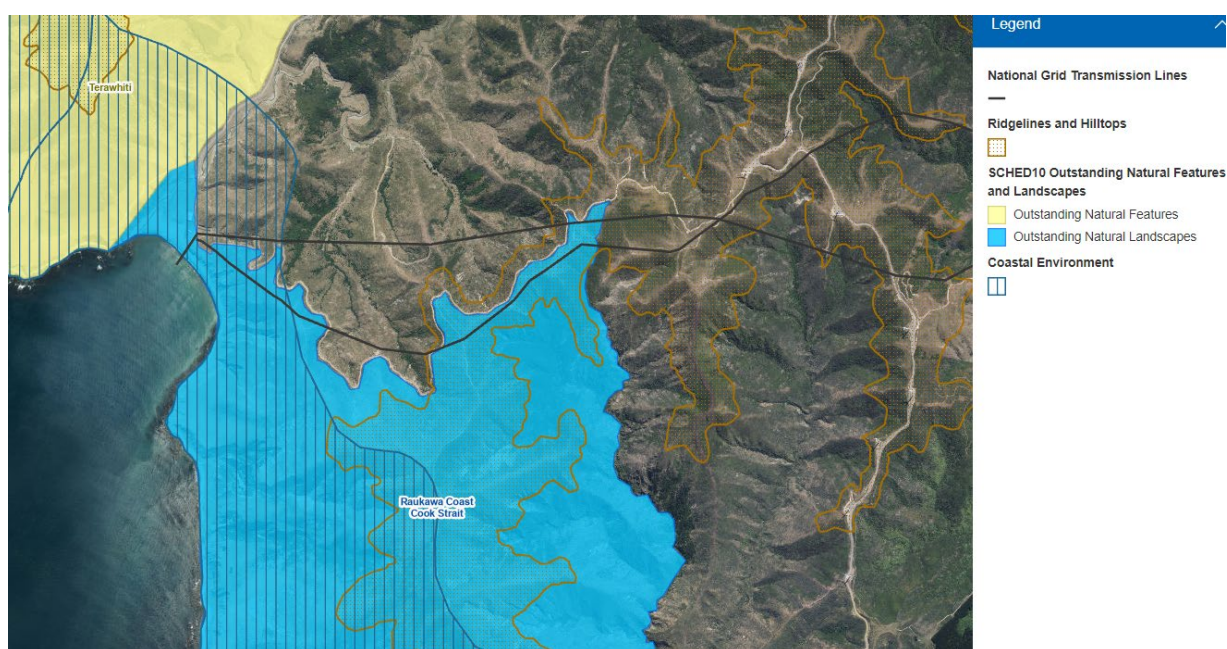


Figure 3. Oteranga Bay - ONFL and CE overlays

- 7.33. In addition to the opposed non-complying activity status for notified rule INF-NFL-R57, in its submission Transpower sought a restricted discretionary activity status for rule INF-NFL-R56. I support an amended activity status on the basis the matters of discretion will allow for a broad consideration of effects, that SAL and Ridgeline and Hilltops are not RMA S6 matters, and the strong policy directives within NPSET. A restricted discretionary activity status would also be consistent with notified rule INF-NFL-R52 (amended as R44) which applies to other new infrastructure within SAL's and Ridgelines and Hilltops. In my opinion it would be an anomaly to have a more

¹³ Rule R180

stringent activity status for the National Grid which has supporting national direction, above other types of infrastructure.

7.34. Based on the above, the two 'new' rules I support are as follows (refer blue text):

INF-NG-R66 New National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops, outside the coastal environment:

All Zones 1.

Activity status: Restricted Discretionary

Matters of discretion are:

1. The matters in INF-NG-P58, and INF-NG-P63.

INF-NG-R67 New National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops, inside the coastal environment:

All Zones 1.

Activity status: Discretionary

7.35. The remainder of the rules recommend in the National Grid sub chapter are addressed in turn.

7.35.1. **INF-NG-R58 and Standard INF-NG-S18:** In its submission Transpower supported the provision of a National Grid Yard specific rule but sought refinement to clarify the application of the rule and non-complying activities. The amendments sought were as follows:

- *Insertion of a list of non-complying activities to make it clear to plan users those activities that are not permitted. This will assist with plan interpretation and application and given the national significance of the National Grid and non-complying activity status for those activities which are not appropriate in the National Grid Yard, will provide certainty for plan users.*
- *On the basis of the sought non-complying activity clause b., permitted activities a. and b. relating to sensitive activities and hazardous substances can be removed as they are more appropriately addressed and framed as non-complying activities.*

And to the standard INF-S12, changes were sought to:

- *Replacement of clause 1 and 2 with a reference to general compliance with the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001). This ensures all the safety distances are complied with for all activities (and not just clearance distances).*
- *Insertion of a new clause 2. relating to ensuring vehicular access is maintained to support structures. Transpower submits that access is an important component of the electricity transmission network and the associated planning framework. The NPSET provides clear a policy directive that decision makers must “recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network” (Policy 2) and ensure that “operation, maintenance, upgrading, and development of the electricity transmission network is not compromised” (Policy 10).*

7.35.2. The Section 42 Report at paragraphs 305 supports the changes “*The proposed National Grid sub chapter is to detail activities in the National Grid Yard. As such, I consider that INF-R22 be deleted and inserted (including the changes sought by Transpower under submission point [315.79, 315.80]) into that sub chapter. The reason I agree with Transpower submission point [315.79, 315.80] is because it provides greater specificity to the activities which could result in reverse sensitivity effects on the National Grid.*” and at paragraph 371 “*As per the reasoning for INF-R22, the proposed National Grid sub chapter is to enable and regulate activities in the National Grid Yard. As such, I consider that INF-S12 can be deleted and inserted (including the changes sought by Transpower under submission point [315.89, 315.90]) into that sub chapter.*”

7.35.3. Although supported, the changes have not been incorporated into the National Grid sub chapter rule INF-NG-R58 and standard INF-NG-S18. I assume this is an oversight.

7.35.4. Based on the above, I support the changes sought in the Transpower submission and would support the changes to the rule and standard as follows (including correct cross-referencing) (refer [blue](#) text):

<p><i>INF-NG-R58 Buildings, structures and activities in the National Grid Yard</i> <i>All Zones</i></p>

1. Activity status: Permitted

Where:

- ~~a. New activities are not a sensitive activity;~~
- ~~b. The building or structure is not used for the handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities);~~
- c. Fences do not exceed 2.5m in height;
- d. The building is an uninhabited farm or horticultural structure or building (but not commercial greenhouses, protective canopies, wintering barns, produce packing facilities, or milking/dairy sheds (excluding ancillary stockyards and platforms);
- e. Alterations and additions to an existing building or structure for a sensitive activity, which does not involve an increase in the building height or building footprint; Infrastructure undertaken by a network utility operator as defined in the Resource Management Act 1991 or any part of electricity infrastructure that connects to the National Grid; and Compliance is achieved with INF-S12.
- f. Construction of an accessory building associated with an existing residential activity that is less than 10m² in footprint and 2.5m in height;
- g. Infrastructure undertaken by a network utility operator as defined in the Resource Management Act 1991 or any part of electricity infrastructure that connects to the National Grid; and
- h. Compliance is achieved with INF-NG-S18

All Zones

2. Activity status: Non-complying

Where:

- a. Compliance with INF-NG-R~~67~~58.1 cannot be achieved.
- b. The following activity, building or structure:
 - i. A change of use to a sensitive activity within existing buildings or structures;
 - ii. The establishment of a sensitive activity;
 - iii. The use, handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities);
 - iv. Wintering barns, Commercial greenhouses, Immovable protective canopies, Produce packing facilities, or Milking Sheds; or
 - v. Any building or structure not otherwise provided for under INF-NG-R58.1.

Notification status: An application for resource consent made in respect of rule INF-NG-R6758.2 is precluded from being publicly notified.

Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedures) Regulations 2003.

INF-NG-S18 Buildings, structures and activities in the National Grid Yard

All Zones

- ~~1. All buildings and structures in the National Grid Yard must comply with the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663 under all transmission line and building operating conditions. The building or structure must have a minimum vertical clearance of 10m below the lowest point of a conductor under all transmission line and building operating conditions; or~~
- ~~2. Must ensure vehicular access to any National Grid support structure. Must meet the safe electrical clearance distances required by New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663 under all transmission line and building operating conditions.~~
3. *The building or structure must be located at least 12m from the outer visible edge of a foundation of a National Grid transmission line tower or pole, except where it:*
 - a. *Is a fence not exceeding 2.5m in height that is located at least:*
 - i. *6m from the outer visible edge of a foundation of a National Grid transmission line tower; or*
 - ii. *5m from the outer visible edge of a foundation of a National Grid transmission line pole.*
 - b. *Is an artificial crop protection structure or crop support structure not exceeding 2.5m in height and located at least 8m from a National Grid transmission line pole that:*
 - i. *Is removable or temporary to allow a clear working space of 12m from the pole for maintenance; and*
 - ii. *Allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; or*
 - iii. *Meets the requirements of clause 2.4.1 of New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663*

7.35.5. **INF-NG-R59, R60, R61, R64 and R65** provide for the operation, maintenance and upgrade of existing National Grid assets within the Coastal Environment and/or Natural Feature and Landscape overlays. Notwithstanding the activity status of such activities for existing assets is regulated by the NESETA, I am not opposed to the retention of the rules (should they be required for any new assets). However, I note the Matter of discretion with the upgrading rules R61 and R65 refers to 'INF-NG-P67' which is an error as there is no P67. Instead, the matters should refer to INF-NG-P62, as follows (refer [blue](#) text):

INF-NG-R61 Upgrading of existing National Grid infrastructure within the coastal environment:

- *Within high coastal natural character areas; or*
- *Within coastal or riparian margins.*

All Zones 1. Activity status: Restricted Discretionary

Matters of discretion are:

1. *The matters in INF-NG-P~~67~~[62](#).*

INF-NG-R65 Upgrading of existing National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops

All Zones 1. Activity status: Restricted Discretionary

Matters of discretion are:

1. *The matters in INF-NG-P~~67~~[62](#).*

7.35.6. **INF-NG-R62 and INF-NG-R63** provide specific rules for new National Grid assets within the Coastal Environment. I support the provision of such rules but given the potential scale of new National Grid assets, I do query the appropriateness of a permitted activity status (with no standards) under R62 for new National Grid infrastructure within the coastal environment outside areas of high coastal natural character and coastal or riparian margins. Instead, I would support a restricted discretionary activity with discretion restricted to INF-NG-P58 and INF-NG-P63. However, in saying I would support a restricted discretionary activity status, I do note the similar rule and activity status provided within rule INF-CE-R33 which applies to other

infrastructure (which can vary in scale) and should the panel retain the activity status under INF-CE-R33, I would support a consistent approach (in terms of activity status) being applied to INF-NG-R62. It would seem an anomaly to have a more stringent activity status apply to the National Grid compared to other infrastructure given the higher order national direction afforded to the National Grid.

7.35.7. Based on the above, I support INF-NG-R63 as recommended, and would support amendment to INF-NG-R62 as follows (refer [blue](#) text):

INF-NG-R62 New National Grid (NG) infrastructure within the coastal environment:

- ***Outside of high coastal natural character areas; and***
- ***Outside of coastal or riparian margins.***

All Zones 1.

Activity status: ~~Permitted~~ [Restricted Discretionary](#)

[Matters of discretion are:](#)

- [1. The matters in INF-NG-P63.](#)*

Infrastructure – Coastal Environment, and Natural Features and Landscapes Sub Chapters

7.36. On the basis of the officer recommended Infrastructure – NG Sub Chapter, the Infrastructure – sub chapters for Coastal Environment, and Natural Features and Landscapes would not be applicable to the National Grid, and I accept the officer recommendations on the provisions.

7.37. However, as previously discussed in my evidence, I do recommend some explanation text to the Infrastructure Sub Chapter to clarify the relationship and applicability of the various infrastructure chapter provisions.

Infrastructure – Natural Hazards Sub Chapter

7.38. My understanding is the provisions of the Infrastructure – Natural Hazards sub chapter would apply to the National Grid. I support the officer recommendations on the chapter but would support reference to National Grid sub chapter policy INF-NG-P58 (relating to benefits) within the Matters of Discretion within the rules.

Infrastructure – Other Overlays Sub Chapter

7.39. As with the Natural Hazards Sub Chapter, my understanding is the provisions of the Infrastructure – Other Overlays sub chapter would apply to the National Grid. I support the officer recommendations on the chapter but would support reference to National Grid sub chapter policy INF-NG-P60 (relating to benefits) within the Matters of Discretion within rules INF-OL-R53 and INF-OL-R57.

8. Conclusion

8.1. The National Grid is recognised as a matter of national significance through the NPSET, which seeks to ensure a nationally consistent approach to managing this important national resource.

8.2. Specific to Hearing Stream 9, Transpower lodged an extensive number of submission points.

8.3. The Section 42A reports recommends substantive changes to the policy and rule framework for the National Grid in terms of the creation of a National Grid infrastructure sub chapter which contains the policy framework as it relates to the National Grid, and rules relating to the National Grid within the Coastal Environment and Natural Features and Landscapes overlays, as well as specific rules that apply to proposed activities within the defined National Grid Yard. Rules outside overlays are contained within the Infrastructure chapter (and also within the Natural Hazards and Other Overlays sub chapters where applicable).

8.4. I generally support the recommended structural approach and the specific policy and rule recommendations in principles. My evidence therefore focuses on refinements to specific provisions, including amendment sought in the submission and which have been accepted by the reporting officer in the S42A Reports but have not been carried through into the revised chapters.

Pauline Mary Whitney

27 May 2024

Appendix A

National Policy Statement on Electricity Transmission 2008

NATIONAL POLICY STATEMENT

on Electricity Transmission

Issued by notice in the Gazette on 13 March 2008

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Preamble

This national policy statement sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.

In accordance with section 55(2A)(a) of the Act, and within four years of approval of this national policy statement, local authorities are to notify and process under the First Schedule to the Act a plan change or review to give effect as appropriate to the provisions of this national policy statement.

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act. These include:

- Transporting electricity efficiently over long distances requires support structures (towers or poles), conductors, wires and cables, and sub-stations and switching stations.
- These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant.
- The transmission network is an extensive and linear system which makes it important that there are consistent policy and regulatory approaches by local authorities.
- Technical, operational and security requirements associated with the transmission network can limit the extent to which it is feasible to avoid or mitigate all adverse environmental effects.
- The operation, maintenance and future development of the transmission network can be significantly constrained by the adverse environmental impact of third party activities and development.
- The adverse environmental effects of the transmission network are often local – while the benefits may be in a different locality and/or extend beyond the local to the regional and national – making it important that those exercising powers and functions under the Act balance local, regional and national environmental effects (positive and negative).
- Ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government’s objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

The national policy statement is to be applied by decision-makers under the Act. The objective and policies are intended to guide decision-makers in drafting plan rules, in making decisions on the notification of the resource consents and in the determination of resource consent applications, and in considering notices of requirement for designations for transmission activities.

However, the national policy statement is not meant to be a substitute for, or prevail over, the Act’s statutory purpose or the statutory tests already in existence. Further, the national policy statement is subject to Part 2 of the Act.

For decision-makers under the Act, the national policy statement is intended to be a relevant consideration to be weighed along with other considerations in achieving the sustainable management purpose of the Act.

This preamble may assist the interpretation of the national policy statement, where this is needed to resolve uncertainty.

1. Title

This national policy statement is the National Policy Statement on Electricity Transmission 2008.

2. Commencement

This national policy statement comes into force on the 28th day after the date on which it is notified in the *Gazette*.

3. Interpretation

In this national policy statement, unless the context otherwise requires:

Act means the Resource Management Act 1991.

Decision-makers means all persons exercising functions and powers under the Act.

Electricity transmission network, electricity transmission and transmission activities/assets/infrastructure/resources/system all mean part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.

National environmental standard means a standard prescribed by regulations made under the Act.

National grid means the assets used or owned by Transpower NZ Limited.

Sensitive activities includes schools, residential buildings and hospitals.

4. Matter of national significance

The matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity transmission network.

5. Objective

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- managing the adverse environmental effects of the network; and
- managing the adverse effects of other activities on the network.

6. Recognition of the national benefits of transmission

POLICY 1

In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:

- i) maintained or improved security of supply of electricity; or
- ii) efficient transfer of energy through a reduction of transmission losses; or
- iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or
- iv) enhanced supply of electricity through the removal of points of congestion.

The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.

7. Managing the environmental effects of transmission

POLICY 2

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

POLICY 3

When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.

POLICY 4

When considering the environmental effects of new transmission infrastructure or major upgrades of existing transmission infrastructure, decision-makers must have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.

POLICY 5

When considering the environmental effects of transmission activities associated with transmission assets, decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

POLICY 6

Substantial upgrades of transmission infrastructure should be used as an opportunity to reduce existing adverse effects of transmission including such effects on sensitive activities where appropriate.

POLICY 7

Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.

POLICY 8

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

POLICY 9

Provisions dealing with electric and magnetic fields associated with the electricity transmission network must be based on the International Commission on Non-ionising Radiation Protection *Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz)* (Health Physics, 1998, 74(4): 494-522) and recommendations from the World Health Organisation monograph *Environment Health Criteria* (No 238, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.

8. Managing the adverse effects of third parties on the transmission network

POLICY 10

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

POLICY 11

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

9. Maps

POLICY 12

Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.

10. Long-term strategic planning for transmission assets

POLICY 13

Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

POLICY 14

Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

Explanatory note

This note is not part of the national policy statement but is intended to indicate its general effect

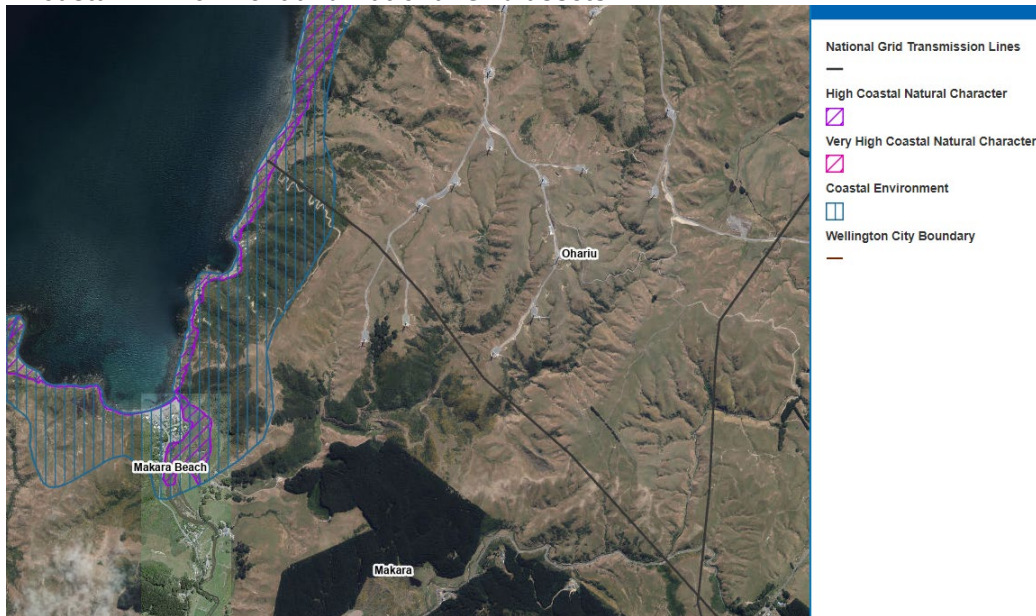
This national policy statement comes into force 28 days after the date of its notification in the *Gazette*. It provides that electricity transmission is a matter of national significance under the Resource Management Act 1991 and prescribes an objective and policies to guide the making of resource management decisions.

The national policy statement requires local authorities to give effect to its provisions in plans made under the Resource Management Act 1991 by initiating a plan change or review within four years of its approval.

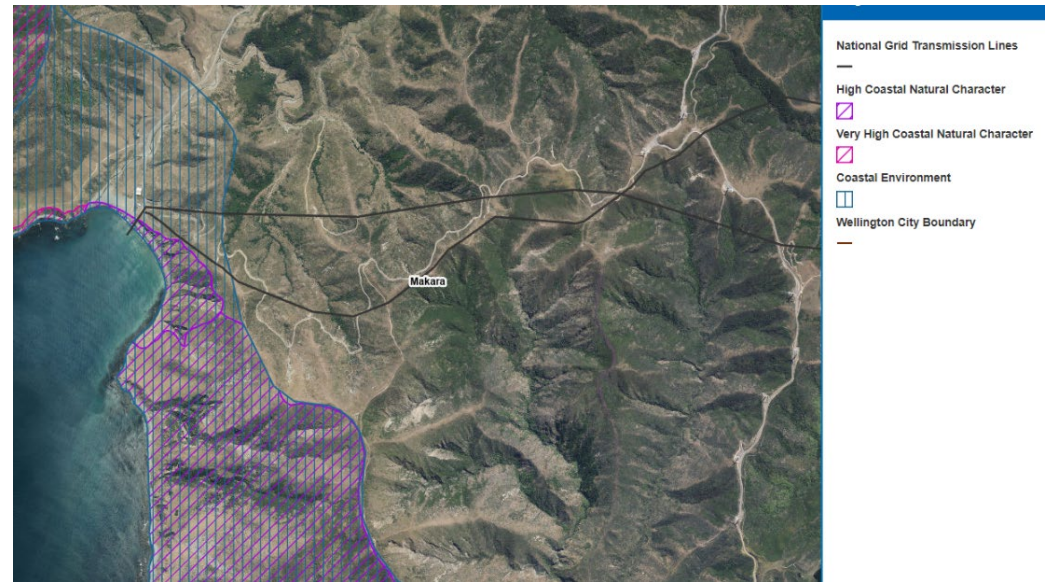
Appendix B

Screenshot of Assets within Overlays

Coastal Environment and National Grid assets

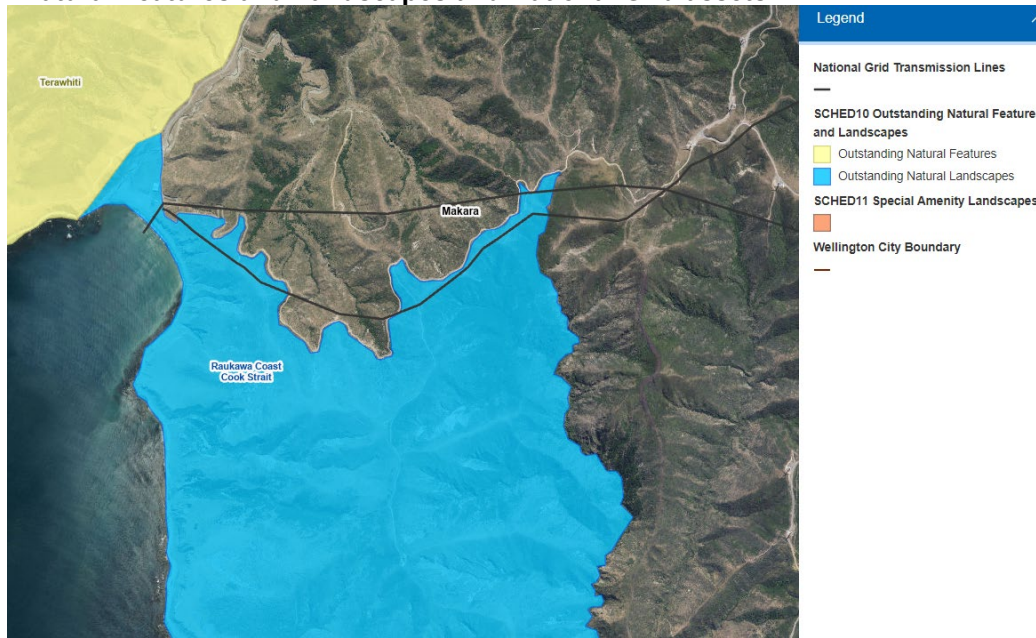


Te Hikowhenua Shore Electrode Station

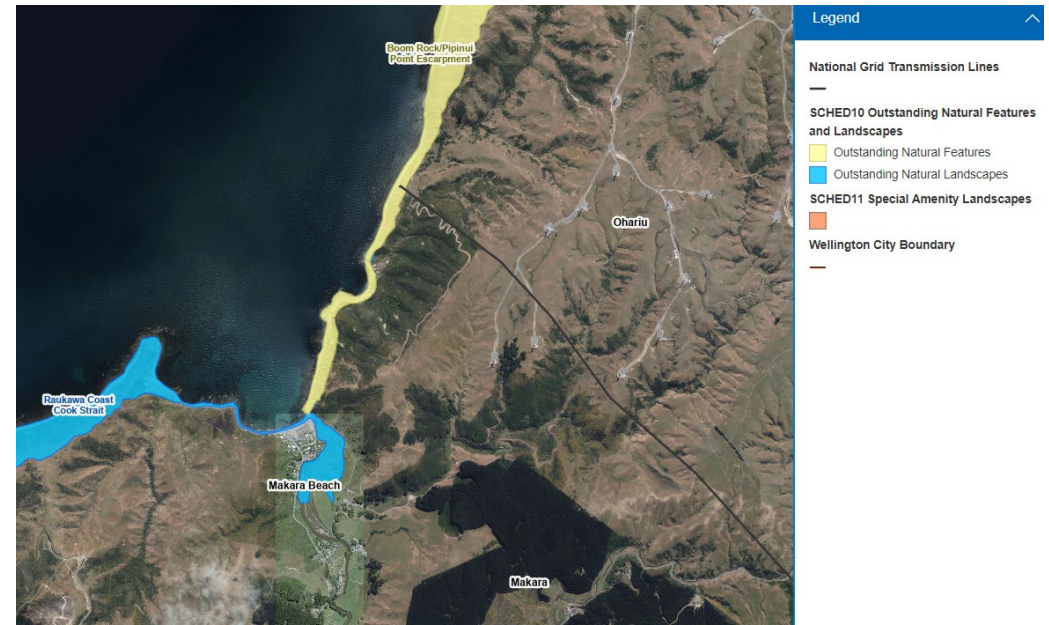


Oteranga Bay Substation

Natural Features and Landscapes and National Grid assets



Oteranga Bay Substation



Te Hikowhenua Shore Electrode Station

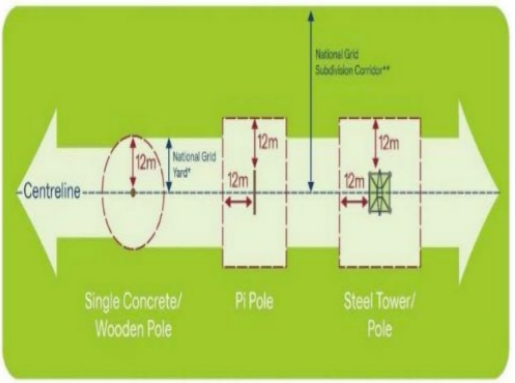
ONFLs, SALs and R&Hs and National Grid assets

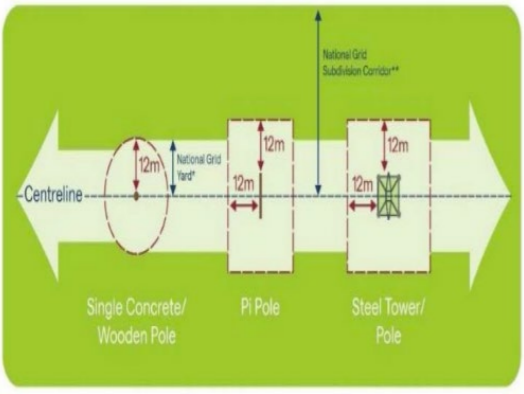


Appendix C

Summary Table - Response to s42A Report Officer Recommendations

Those submission points highlighted orange have not specifically been addressed in the S42A Report.

Sub Ref	Plan Provision	Reasoning and Relief Sought	S42A Recommendation
Part 1 –He Whakatakinga me ngā Kaupapa Kōrero - Introduction and General Provisions			
He Whakamāramatanga - Interpretation			
Ngā Tautuhinga - Definitions			
315.23 and 315.24	<p>MAINTENANCE AND REPAIR means</p> <p>a. To make good decayed or damaged fabric to keep a building or structure in a sound or weatherproof condition or to prevent deterioration of fabric; and</p> <p>b. regular and on-going protective care of a building or structure to prevent deterioration.</p> <p>.....</p> <p>(For the purposes of the INF Infrastructure chapters and the REG Renewable electricity generation chapter) means any work or activity necessary to continue the operation or functioning of existing infrastructure. It does not include upgrading, but does include replacement of an existing structure with a new structure of identical dimensions.</p> <p>...</p>	<p>Notwithstanding that the NESETA regulates maintenance (and by default repair) associated with existing National Grid lines, the definition of maintenance and repair is supported as it recognises activities associated with the ongoing operation of existing network utilities.</p> <p>However, clarification is sought as to how the rule is structured as it is unclear whether the opening clause a. and b. also apply to the INF chapter.</p> <p>Relief sought Retain the definition of MAINTENANCE AND REPAIR as it relates to the INF chapter subject to clarification that clause a. and b. do not apply in the Infrastructure chapters.</p>	Accept Change to PDP – Yes
315.25	<p>NATIONAL GRID has the same meaning as defined in the National Policy Statement on Electricity Transmission 2008 means the assets used or owned by Transpower NZ Limited.</p>	<p>Given 'National Grid' is referenced throughout the PDP, Transpower supports the definition as provided in the National Policy Statement for Electricity Transmission 2008.</p> <p>The provision of a definition provides clarity for plan users as to what is the National Grid and assists with the interpretation and application of the objectives, policies and rules.</p> <p>Relief sought Retain the definition of NATIONAL GRID</p>	Not specifically addressed in S42A Report
315.26 and 315.27	<p>NATIONAL GRID SUBDIVISION CORRIDOR</p> <p>National Grid Subdivision Corridor means, as depicted in Diagram 1, the area measured either side of the centre line of any above ground National Grid transmission lines as follows:</p> <p>a. 14m of a 110kV transmission line on single poles;</p> <p>b. 16m of a 110kV transmission line on pi poles;</p> <p>c. 32m of a transmission line up to and including 110kV, on towers;</p> <p>d. 37m of a 220kV transmission line;</p> <p>e. 39m of a 350kV National Grid transmission lines on towers.</p> <p>The measurement at setback distances from National Grid transmission lines shall be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</p> <p>Note: the National Grid Corridor does not apply to underground cables or any transmission lines (or sections of line) that are designated.</p> 	<p>Transpower is supportive of definitions for National Grid Yard and National Grid Subdivision Corridor as the provision of such definitions gives effect to the NPSET in that they clearly articulate the framework in which to give effect to the NPSET.</p> <p>The subdivision 'National Grid Subdivision Corridor' width of 39m (maximum) is based on the distance from the centreline between the support structures to a point where the conductor would swing under possible high wind conditions and is the swing of the 95th percentile span across the country, as well as other variables. The distance a transmission conductor swings in the wind is dependent on the ambient temperature, the power being carried, the wind speed, the type and size of conductor, the tension the conductor is strung at, the supporting structure configuration (cross arm length) and the length of the span (distance between two towers or poles).</p> <p>To calculate appropriate corridor widths, a set of standard line types, based on voltage and structural configuration have been developed by Transpower. Following analysis, it was determined that the swing is most sensitive to the wind speed and span length. An ambient temperature of 10°C, a wind pressure of 100Pa (46km/hr), full electrical load and the conductor type applicable for the line type were assumed for each transmission corridor. A range of swings was then determined for each line type, and these are reflected in the notified definition. The width of transmission corridors was then determined by the swing of the 95th percentile span across the country and access requirements for maintenance purposes.</p> <p>It is important that the swing of conductors can be taken into account in the subdivision process so that the allotment(s) can be safely developed and used. This is why differing widths are provided for different voltage lines.</p> <p>In essence the Corridor is wider than the Yard and it should be noted that the Corridor and Yard overlap.</p> <p>However, while generally supported, an amendment is sought to the definition to recognise the two transmission lines within the city that have non-standard features, being the:</p> <ul style="list-style-type: none"> • South Makara - Oteranga Bay A (SMK-OTB-A) – 11kV Single Circuit on Single Poles (including an underground portion that traverses Karori Golf Club). A 10m National Grid Yard and a 18m National Grid Subdivision Corridor is sought for this line. • Te Hikowhenua - Deviation A (THW-DEV-A) - Single Circuit Steel Towers and Pi poles. A 10m National Grid Yard and a 16m National Grid Subdivision Corridor is sought for this line. <p>A 14m setback is also sought for cables.</p> <p>Relief sought Retain the definition of NATIONAL GRID SUBDIVISION CORRIDOR subject to amendment as follows:</p> <p>NATIONAL GRID SUBDIVISION CORRIDOR National Grid Subdivision Corridor means, as depicted in Diagram 1, the area measured either side of the centre line of any above ground National Grid transmission lines as follows:</p> <p>a. 14m of a 110kV transmission line on single poles <u>or a cable</u>;</p> <p>b. 16m of a 110kV transmission line on pi poles;</p> <p>c. 16m of the Te Hikowhenua - Deviation A (THW-DEV-A) transmission line on towers and Pi poles;</p> <p>d. 18m of the South Makara - Oteranga Bay A (SMK-OTB-A) 11kV transmission line on Single Poles;</p> <p>ee. 32m of a transmission line up to and including 110kV, on towers;</p> <p>df. 37m of a 220kV transmission line;</p> <p>eg. 39m of a 350kV National Grid transmission lines on towers.</p>	Not specifically addressed in S42A Report

Sub Ref	Plan Provision	Reasoning and Relief Sought	S42A Recommendation
		<p>The measurement at setback distances from National Grid transmission lines shall be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</p> <p>Note: the National Grid Corridor does not apply to underground cables or any transmission lines (or sections of line) that are designated.</p>	
<p>315.28 and 315.29</p>	<p>NATIONAL GRID YARD means, as depicted in Diagram 1:</p> <p>a. the area located within 12m of either side of the centreline of an above ground 110kV electricity transmission line on single poles;</p> <p>b. the area located within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is up to 110kV or greater;</p> <p>c. the area located within 12m in any direction from the outer visible edge of an electricity transmission pole or tower foundation, associated with a line which is up to 110kV or greater.</p> <p>The measurement of setback distances from National Grid transmission lines must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</p> <p>Note: the National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.</p> 	<p>Transpower is supportive of definitions for National Grid Yard and National Grid Corridor as the provision of such definitions give effect to the NPSET in that they clearly articulate the framework in which to give effect to the NPSET.</p> <p>The 'National Grid Yard', is a 10m- 12m width calculated as the distance from the centreline between the support structures to the point where the conductor would swing under everyday conditions (noting that maintenance is not generally undertaken in high wind conditions).</p> <ul style="list-style-type: none"> - Clause (a) relates to the line setback for 110kV lines on single poles; - Clause (b) relates to the line setback from towers or pi-poles (for both 110kV and 220kV lines); and - Clause (c) relates to the 12m setback from the actual support structure. <p>However, while generally supported, an amendment is sought to recognise the two transmission lines within the City that have non-standard features, being the:</p> <ul style="list-style-type: none"> • South Makara - Oteranga Bay A (SMK-OTB-A) – 11kV Single Circuit on Single Poles (including an underground portion that traverses the Karori Golf Club). A 10 metre National Grid Yard and a 18 metre National Grid Subdivision Corridor is sought for this line. An amendment is sought to clause a. to reflect the 10 metre setback from the centreline where the line features poles, and for (underground) cables. • Te Hikowhenua - Deviation A (THW-DEV-A) - Single Circuit Steel Towers and Pi poles. A 10m National Grid Yard and a 16m National Grid Subdivision Corridor is sought for this line. <p>An amendment is also sought to the setback from support structures to apply the 12 metre setback regardless of voltage. This is to ensure the support structure and line is not compromised.</p> <p>Relief sought Retain the definition of NATIONAL GRID YARD subject to amendment as follows:</p> <p>NATIONAL GRID YARD means, as depicted in Diagram 1:</p> <p>a. the area located within 12m 120m of either side of the centreline of an above ground 110kV electricity 110kV transmission line up to and including 110kV on single poles, or a cable;</p> <p>b. b. the area located within 10m of either side of the centreline of the Te Hikowhenua - Deviation A (THW-DEV-A) - Single Circuit transmission line on towers and Pi poles;</p> <p>c. c. the area located within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is up to 110kV or greater;</p> <p>d. d. the area located within 12m in any direction from the outer visible edge of an electricity transmission support structure pole or tower foundation, associated with a line which is up to 110kV or greater.</p> <p>The measurement of setback distances from National Grid transmission lines must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</p> <p>Note: the National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.</p>	<p>Not specifically addressed in S42A Report</p>

Part 2 – Ngā Kaupapa o te Rohe Whānui - District-Wide Matters

Pūngao, Tūāhanga me te Tūnuku - Energy, Infrastructure and Transport

INF – Tūāhanga - Infrastructure

<p>315.48</p>	<p>Infrastructure- General submission point</p>	<p>As a general comment, Transpower queries the number of Infrastructure sub chapters, policies (62) and rules relating to Infrastructure and specifically the National Grid. The myriad of provisions is confusing and creates the potential for contradiction between provisions. There are no National Grid specific policies within the Infrastructure subchapter. However, there are 18 policies within other sub chapters specific to managing the effects of the National Grid, as follow:</p> <ul style="list-style-type: none"> - Five within the Infrastructure – Coastal Environment Chapter (INF-CE P26, P27, P28, P31, P32) - Three within the Infrastructure – Ecosystems and Indigenous Biodiversity Chapter (INF-ECO P35, P36, P37) - Ten within the Infrastructure – Natural Features and Landscape Chapter (INF-NFL P51 – P60) <p>As such, there are no National Grid specific policies in the plan that specifically recognise the benefits of the National Grid or management of the effects of subdivision, land use and development on the National Grid. While there are 18 policies within other sub chapters specific to the National Grid, these only relate to managing the effects of the National Grid. Transpower considers the lack of recognition within the general infrastructure chapter does not give effect to the NPSET, and the provision of 18 other National Grid specific policies excessive. Given the national significance of the National Grid and that this significance is recognised in the NPSET, Transpower seeks a separate set of provisions within the Infrastructure section.</p> <p>Transpower also notes that the above identified 18 policies in the sub chapters apply to the National Grid and the Gas Transmission Pipeline Corridor. Notwithstanding the significance and importance of the Gas Transmission Pipeline Corridor, Transpower seeks standalone policies specific to the National Grid in order to give effect to the NPSET, noting the Gas Corridor does not have the higher order policy support of an NPS.</p> <p>As a general comment, given many of the overall provisions have similar directives and wording, Transpower suggests the multiple overlay provisions could be combined.</p>	<p>Accept in part Change to PDP – Yes</p>
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Sub Ref	Plan Provision	Reasoning and Relief Sought	S42A Recommendation
		<p>Specific to the rules, there are rules relating to the operation, maintenance and upgrade of existing National Grid assets. Given existing assets are regulated by the NESETA, Transpower does not support the duplicating rules in the PDP. The purpose of the NESETA is to provide a complete and nationally consistent regulatory framework for existing National Grid assets. The inclusion of rules in the PDP is confusing and, in some instances, inconsistent with the NESETA. The provisions will lead to plan interpretation and application issues.</p> <p>Included in this submission are specific relief sought. Transpower's preference is for a separate suite of National Grid provisions policies and rules within a separate Infrastructure sub- chapter. Sought policies are attached as Appendix F. All rules relating to existing National Grid assets should be removed (as these are regulated by the NESETA).</p> <p>Alternately, should this approach not be accepted by decision makers, Transpower seeks the amendments as outlined in this submission, specifically:</p> <ul style="list-style-type: none"> - In order to give effect to the NPSET, a separate policy framework be provided within the infrastructure chapter for the National Grid which recognises and provides for the benefits of the National Grid, manages the effects of the development of National Grid, and the effects of other activities on the National Grid. - On the basis the approach to provide National Grid specific policies within the sub-chapters is retained, significant amendments are sought to the policies including rationalisation, and amendments to give effect to the NPSET. Specific National Grid policies relating to the development of the National Grid are sought to be deleted from the sub-chapters and instead, a comprehensive 'seek to avoid' development policy be provided in the Infrastructure chapter. The provision of a comprehensive 'development' policy gives effect to the NPSET, recognises the linear nature of the network and that any new development will traverse a number of overlays, and accordingly provides an integrated policy framework - The National Grid be separated from the Gas Transmission Pipeline Corridor - The number of National Grid specific policies and rules be condensed and reduced; and - Rules relating to existing National Grid assets be removed and instead the NESETA be relied on (as is the intent of the NESETA). <p>Relief sought Transpower's preference is for a separate suite of National Grid provisions (policies and rules) within a separate Infrastructure sub- chapter. The sought policies are attached as Appendix F. All rules relating to existing National Grid assets should be removed (as these are regulated by the NESETA).</p> <p>Alternately, Should this approach not be adopted, Transpower seeks the amendments as outlined in this submission, specifically:</p> <ul style="list-style-type: none"> - In order to give effect to the NPSET, a separate policy framework be provided within the Infrastructure chapter for the National Grid which recognises and provides for the benefits of the National Grid, manages the effects of the development <u>of</u> National Grid, and the effects of other activities <u>on</u> the National Grid); - Policies relating to the National Grid are amended to give effect to the NPSET. - The National Grid be separated from the Gas Transmission Pipeline Corridor; - The number of National Grid specific policies and rules be condensed and reduced; and <p>Rules relating to existing National Grid assets be removed and instead the NESETA be relied on (as is the intent of the NESETA).</p>	
315.49	<p>Introduction <i>The provisions within this chapter apply on a City-wide basis. As such the rules in the zone chapters and earthworks chapter do not apply to infrastructure unless specifically stated within an infrastructure rule or standard. Likewise, the rules in the overlay chapters do not apply to infrastructure. Instead, infrastructure sub-chapters address the requirements particular to the overlays as follows:</i></p> <ul style="list-style-type: none"> • INF-CE (Coastal Environment and Natural Character); • INF-ECO (Significant Natural Areas); • INF-NFL (Outstanding Natural Landscapes, Outstanding Natural Features, Special Amenity Landscapes, • Ridgelines and Hilltops; • INF-NH (Natural Hazards); and • INF-OL (Other Overlays). <p><i>The provisions of the overlay sub-chapters apply in addition to the provisions of this chapter. In the case of conflict with any provisions of this chapter and a sub-chapter, the provisions of the sub-chapter will prevail.</i></p> <p>.... Additional regulatory requirements, separate to the District Plan, are also relevant to infrastructure, including:</p> <ol style="list-style-type: none"> 1. The National Policy Statement on Electricity Transmission; 2. The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA); 3. The Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF); 4. The National Code of Practice for Utility Operators' Access to Transport Corridors; 5. The New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001); and 6. Electricity (Hazards from Trees) Regulations 2003. 	<p>Transpower largely supports the introduction to the INF chapter on the basis it articulates the importance of infrastructure and makes specific reference to the NPSET.</p> <p>In particular Transpower supports the clarity provided in the introduction as to the relationship of the Infrastructure chapter provisions to other chapters in the PDP.</p> <p>Relief sought Retain the introductory text to the INF chapter.</p>	Accept in part Change to PDP – No

	<i>In the case of conflict with any provision of this plan and any national environmental standard (including the NESETA or the NESTF), under Section 43B of the Act the provisions of the national environmental standards will prevail.</i>		
315.56	INF-O1 The benefits of infrastructure <i>The national, regional and local benefits of infrastructure are recognised and provided for.</i>	Transpower supports INF-O1 in that specific to the National Grid, the objective gives effect to Policy 1 of the NPSET, noting that the objective as proposed is not confined to the National Grid. As noted in the general comments within this submission, given the national significance of the National Grid and that this significance is recognised in the NPSET, Transpower seeks a separate set of provisions. Relief sought Retain INF-O1.	Accept Change to PDP – No
315.57	INF-O2 Adverse effects of infrastructure <i>The adverse effects of infrastructure on the environment are managed, while recognising:</i> 1. <i>The functional and operational need of infrastructure; and</i> 2. <i>That positive effects of infrastructure may be realised locally, regionally or nationally.</i>	Transpower supports the directive within the objective that effects be managed, while recognising functional and operational needs and positive effects. Relief sought Retain INF-O2.	Accept Change to PDP – No
315.58 and 315.59	INF-O3 Adverse effects on infrastructure <i>Manage the adverse effects, including reverse sensitivity effects or subdivision use and development on the function and operation of infrastructure.</i>	Transpower supports the objective but seeks a minor grammatical amendment. Relief sought Retain INF-O3, but amend a grammatical error as follows: INF-O3 Adverse effects on infrastructure <i>Manage the adverse effects, including reverse sensitivity effects, of subdivision use and development on the function and operation of infrastructure.</i>	Accept Change to PDP – Yes
315.50 and 315.60 and 315.61	INF-P1 Recognising and providing for infrastructure <i>Recognise the benefits of infrastructure by:</i> 1. <i>Enabling the safe, resilient, effective and efficient operation, maintenance, repair, minor upgrade or removal of existing infrastructure;</i> 2. <i>Enabling investigation, monitoring and navigation activities associated with infrastructure operations;</i> 3. <i>Providing for significant upgrades to, and the development of new infrastructure; and</i> 4. <i>Providing for the functions and responsibilities of infrastructure as lifeline utilities during an emergency.</i>	Transpower generally supports INF-P1. However, it seeks that INF-P1 be amended to make reference to the benefits being “provided for” in addition to being “recognised” so that the Policy also reflects the wording in Policy 1 of the NPSET, and reflects INF-O1. Given the NPSET is specific to the National Grid, Transpower would prefer the provision of a new ‘benefits’ policy (as well as other policies) specific to the National Grid as opposed to amendment to INF-P1. Relief sought Provide a National Grid specific policy as follows: INF-NG-P1 Benefits of the National Grid <i>Recognise and provide for the benefits of the National Grid by enabling the operation, maintenance and upgrade of the existing National Grid and the establishment of new electricity transmission resources.</i> Should a National Grid specific policy not be provided, Transpower seeks amendment to policy INF-P1 to give effect to the NPSET.	Accept in part Change to PDP – Yes
315.51	New Policy	Given the national significance of the National Grid as recognised in the NPSET, Transpower seeks a general policy to give effect to the NPSET. Relief sought Provide a new National Grid specific policy as follows: INF-NG-P3 Maintenance, operation, upgrading and development of the National Grid <i>Enable the operation, maintenance, upgrading and development of the National Grid, recognising its operational, functional and technical constraints, the complexity of the interconnectedness of networks, and its role in servicing existing and planned development.</i>	Accept in part Change to PDP – Yes
315.62	INF-P3 Technological advances <i>Provide flexibility to adopt new technologies for infrastructure that:</i> 1. <i>Allow for the re-use of redundant services and structures;</i> 2. <i>Increase resilience, safety or reliability of networks and services;</i> 3. <i>Result in environmental benefits or enhancements; or</i> 4. <i>Promote environmentally sustainable outcomes.</i>	Transpower supports the policy. Relief sought Retain INF-P3.	Accept Change to PDP – No
315.63	INF-P4 Undergrounding of infrastructure <i>Encourage the undergrounding of new infrastructure in urban areas where it is practicable and technically feasible.</i>	Transpower supports the policy, and specifically the use of the word ‘encourage’, and references to where ‘practicable’ and ‘technically feasible’. Relief sought Retain INF-P4.	Accept Change to PDP – No
315.64	INF-P5 Adverse effects of infrastructure <i>Manage the adverse effects of upgrades to, or the development of new infrastructure, including effects on:</i> 1. <i>Natural and physical resources;</i> 2. <i>Amenity values;</i> 3. <i>Sensitive activities;</i> 4. <i>The identified values of Overlays;</i> 5. <i>The safe and efficient operation of other infrastructure; and</i> 6. <i>The health, well-being and safety of people and communities.</i>	Given the general nature of INF-P5, Transpower is supportive of the policy. In particular the use of the word ‘manage’ is supported. However, as highlighted in other points, in order to give effect to the NPSET, a specific National Grid provision is sought. Relief sought Retain INF-P5, notwithstanding Transpower has sought a specific suite of National Grid provisions.	Accept in part Change to PDP – No

<p>315.65 and 315.52 and 315.66</p>	<p>INF-P6 Consideration of the adverse effects of infrastructure When considering the adverse effects of infrastructure on the environment recognise that there may be situations where all adverse effects, including construction effects, cannot be avoided, and as such must be remedied or mitigated through having regard to the following:</p> <ol style="list-style-type: none"> 1. 1. The extent to which adverse effects can be avoided, remedied or mitigated may be constrained by the functional or operational need of the infrastructure; 2. The time, duration, or frequency of adverse effects; 3. The necessity of the infrastructure including: <ol style="list-style-type: none"> a. The need to quickly repair and restore disrupted services; and b. The impact of not operating, repairing, maintaining, upgrading, removing or developing infrastructure; 4. Existing infrastructure including: <ol style="list-style-type: none"> a. The complexity and connectedness of networks and services; and b. The potential for co-location and shared use of infrastructure corridors; 5. Anticipated outcomes for the receiving environment and the degree to which past modifications have compromised the achievement of those outcomes; 6. The benefits derived from the infrastructure at a local, regional and national scale; and 7. The extent to which the infrastructure is integrated with, and necessary to support, planned urban development. 	<p>In order to give effect to the NPSET, Transpower seeks specific National Grid provisions. While Transpower supports in principle INF-P6, it does not reflect or give effect to the NPSET and is not specific to the National Grid. It also does not provide a 'seek to avoid' approach for the more sensitive environments and the policy framework in the INF sub chapters for new development of the National Grid within such environments also does not give effect to the 'seek to avoid' policy approach within Policy 8 of the NPSET. The provision of a National Grid specific policy provides a comprehensive policy approach that gives effect to the NPSET.</p> <p>The need to operate, maintain, upgrade and develop the electricity transmission network is recognised as a matter of national significance through the NPSET. This significance applies universally across the country regardless of the nature of the specific National Grid asset. The NPSET Objective recognises that the network itself potentially gives rise to adverse effects, and that other activities can potentially adversely affect the network. The NPSET policies give direction on how to achieve the objective by providing for the recognition of the benefits of electricity transmission, as well as the management of the environmental effects of electricity transmission and the adverse effects of other activities on the transmission network. As such, the NPSET policies impose obligations on both decision-makers and Transpower itself. One of the aspects within the NPSET which must be given effect to in district plans is provisions relating to enabling the National Grid. Policies and plans must provide for the effective operation, maintenance, upgrading and development of the National Grid. Associated with the development of National Grid assets is the potential for adverse environmental effects. Policies 2 to 9 relate to management of the environmental effects of electricity transmission. In particular, Policy 2 states: "In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network."</p> <p>Policies 3 to 5 contain matters which decision-makers must consider, including technical and operational constraints, the route, site and method selection process, and operational requirements.</p> <p>Policy 6 of the NPSET seeks to reduce existing adverse effects where appropriate, while Policies 7 and 8 relate to effects on urban and rural environments respectively. Policy 9 specifically relates to health standards.</p> <p>Policies 2 to 9 are particularly relevant to the PDP as they provide the policy framework for managing the environmental effects of electricity transmission in recognising and providing for the ongoing operation and development of the National Grid.</p> <p>The development of the National Grid must therefore be managed to ensure the potential for adverse effects is appropriately managed while recognising the significance of the National Grid and the constraints under which it operates. The NPSET requires the District Plan to include objectives and policies that:</p> <ul style="list-style-type: none"> - Allow for the consideration of the technical constraints and operational requirements under which the National Grid operates, for example the linear nature of the transmission lines. - Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site and method selection. - Ensure new planning and development seeks to avoid adverse effects on more sensitive areas. <p>Policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and method selection process when considering the adverse effects of new National Grid infrastructure on the environment.</p> <p>On this basis, Transpower supports a new policy specific to the development of the National Grid.</p> <p>Relief sought Retain INF-P And Provide a National Grid specific policy as follows: <u>INF-NG-P6 Development of the National Grid</u> <u>Provide for the development of the National Grid</u></p> <ol style="list-style-type: none"> 1. <u>In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the Commercial and Mixed-Use zones, and areas of high recreational or amenity value and existing sensitive activities.</u> 2. <u>Seek to avoid the adverse effects of the National Grid within areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED8 - Significant Natural Areas, and SCHED11 – Special Amenity Landscapes, outside the coastal environment.</u> 3. <u>Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</u> <ol style="list-style-type: none"> a. <u>Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin.</u> b. <u>Where it is not practicable to avoid adverse effects on the values of the areas in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</u> c. <u>Seeking to avoid significant adverse effects on:</u> <ol style="list-style-type: none"> i. <u>other areas of natural character</u> ii. <u>natural attributes and character of other natural features and natural landscapes</u> iii. <u>indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010</u> d. <u>Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</u> e. <u>Recognising there may be some areas within SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin, where avoidance of adverse effects is required to protect the identified values and characteristics.</u> 4. <u>Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided, to the extent practicable; and</u> 5. <u>When considering the adverse effects in respect of 1-3 above:</u> <ol style="list-style-type: none"> a. <u>Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and</u> b. <u>Consider the constraints arising from the operational needs or functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</u> 	<p>Accept in part Change to PDP – Yes</p>
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<p>315.53 and 315.66 and 315.67</p>	<p>INF-P7 Reverse sensitivity <i>Manage the establishment or alteration of sensitive activities near existing lawfully established infrastructure, including by:</i></p> <ol style="list-style-type: none"> 1. <i>Requiring subdivision of sites containing the National Grid to:</i> <ol style="list-style-type: none"> a. <i>Retain the ability for the network utility operator to access, operate, maintain, repair and upgrade National Grid; and</i> b. <i>Ensure that future buildings, earthworks and construction activities maintain safe electrical clearance distances under all building and National Grid operating conditions;</i> 2. <i>Managing land disturbance and activities sensitive to gas transmission to avoid or mitigate potential adverse effects of, and on, gas transmission pipelines;</i> 3. <i>Requiring subdivision of sites containing a gas transmission pipeline to retain the ability for the network utility operator to access, operate, maintain, repair and upgrade the gas transmission pipeline; and</i> 4. <i>Managing the activities of others through set-backs and design controls where it is necessary to achieve appropriate protection of infrastructure.</i> 	<p>In order to give effect to the NPSET, Transpower seeks specific National Grid provisions. While Transpower supports in principle INF-P7, it does not reflect or give effect to the NPSET. The primary concerns are:</p> <ul style="list-style-type: none"> - The policy title “Reverse sensitivity” only relates to one aspect of Policy 10 of the NPSET and fails to give effect to the second part of Policy 10 which is to ensure the Grid is not compromised. As such the title is misleading and does not address all the issues and effects associated with effects of activities on the National Grid. - The policy only applies to sensitive activities, ignoring other activities which may compromise the National Grid. In addition to the health and safety issues of activities locating within proximity of the National Grid, the National Grid can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field (‘EMF’) effects, or interference with business activities beneath the lines. The location of buildings and activities, particularly ‘sensitive activities’ such as schools and residential properties, beneath or in close proximity to lines and/or structures can also compromise Transpower’s ability to maintain, upgrade and develop the National Grid. Additionally, the stability of National Grid lines can be affected by earthworks that destabilise support structures resulting in their need to be relocated. Of particular relevance in terms of the effects of activities on the National Grid are NPSET Policies 10 and 11. These policies act as the primary guide to inform how adverse effects on the National Grid are managed. The policies seek to: <ul style="list-style-type: none"> o Avoid sensitive activities near electricity transmission lines and infrastructure; o Manage other activities to avoid reverse sensitivity effects on the Grid; and o Manage activities to ensure the operation, maintenance, upgrading and development of the Grid is not compromised. <p>As proposed, Policy INF-P7 does address any of the above adequately.</p> <ul style="list-style-type: none"> - Clause 2. and 3. do not apply to the National Grid. - Clause 1. of the policy is limited to subdivision, ignoring that land use and other development activities (such as earthworks) can compromise the National Grid. - Clause 4. is general in nature and insufficiently directive to give effect the NPSET. There is no reference to sensitive activities, or to ensure the National Grid is not compromised. - Earthworks are not referenced in the policy, noting there are specific earthworks rules. - Given the national significance of the National Grid and non-complying activity status where standards are not complied with, a more directive policy framework is required. As proposed, the policy does not give effect to NPSET policies 10 and 11. Use of the word ‘manage’ within INF-P7 is not sufficiently directive. <p>On this basis Transpower seeks a separate policy framework for the National Grid.</p> <p>Relief sought Provide a National Grid specific policy as follows:</p> <p><u>INF-NG-P4 Adverse effects on the National Grid</u> <i>Protect the safe and efficient operation, maintenance and repair, upgrading, removal and development of National Grid from adverse effects by:</i></p> <ol style="list-style-type: none"> 1. <i><u>Avoiding land uses (including sensitive activities) and buildings and structures within the National Grid Yard that may directly affect or otherwise compromise the National Grid;</u></i> 2. <i><u>Avoiding reverse sensitivity effects on the National Grid.</u></i> 3. <i><u>Only allowing subdivision within the National Grid Subdivision Corridor where it can be demonstrated that the National Grid will not be compromised taking into account:</u></i> <ol style="list-style-type: none"> a. <i><u>The impact of the subdivision layout and design on the operation, maintenance, and potential upgrade and development of the National Grid, including the ability for continued reasonable access to existing transmission assets for maintenance, inspections and upgrading;</u></i> b. <i><u>The ability of any potential future development to comply with NZECP 34.2001 New Zealand Electrical Code of Practice for Electrical Safety Distances;</u></i> c. <i><u>The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a principal building or dwelling can be provided outside of the National Grid Yard for each new lot;</u></i> d. <i><u>The risk to the structural integrity of the National Grid;</u></i> e. <i><u>The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from the National Grid and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid assets;</u></i> f. <i><u>The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid;</u></i> g. <i><u>The outcome of any consultation with, and technical advice from, Transpower.</u></i> 4. <i><u>Only allowing earthworks within the National Grid Yard where it can be demonstrated that the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid will not be compromised, taking into account:</u></i> <ol style="list-style-type: none"> a. <i><u>The extent to which the earthworks may compromise the safe access to and operation, maintenance and repair, upgrading and development of the National Grid;</u></i> b. <i><u>The stability of land within and adjacent to the National Grid;</u></i> c. <i><u>Risks relating to health or public safety, including the risk of property damage; and</u></i> d. <i><u>Technical advice provided by the owner and operator of the National Grid.</u></i> <p>Should a National Grid specific policy not be provided, Transpower seeks amendment to policy INF-P7 to give effect to the NPSET.</p>	<p>Accept in part Change to PDP – Yes</p>

315.68	<p>INF-R1 Operation, maintenance and repair, or removal of existing above and underground infrastructure and ancillary vehicle access tracks</p> <p>All Zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. All above ground structures that are no longer required for the operation of the infrastructure are removed within twelve months of being replaced or becoming redundant;</p> <p>b. Compliance is achieved with INF-S1; and</p> <p>c. Compliance is achieved with the following standards:</p> <p>i. In relation to existing underground infrastructure, INF-S2;</p> <p>ii. INF-S3; and</p> <p>iii. INF-S12.</p> <p>All Zones</p> <p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance with INF-R1.1.a and INF-R1.1.c cannot be achieved.</p> <p>Matters of discretion are:</p> <p>1. The matters set out in INF-P1, INF-P3, INF-P5 and INF-P6.</p> <p>All Zones</p> <p>3. Activity status: Non-Complying</p> <p>Where:</p> <p>a. Compliance with INF-R1.1.b cannot be achieved</p>	<p>Specific to the National Grid, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”) provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid, and on this basis, INF-R1 for existing National Grid structures captured by the NESETA is of limited relevance to Transpower in respect of rule application. It is noted the NESETA provides a Discretionary activity status under Regulations 39 of the NESETA for those activities subject to the NESETA but not otherwise captured under other regulations in the NESETA.</p> <p>Relief sought Retain INF-R1.</p>	Accept Change to PDP – No
315.69	<p>INF-R2 New underground infrastructure (including customer connections), and upgrading of existing underground Infrastructure</p> <p>....</p>	<p>Transpower supports INF-R2.</p> <p>Relief sought Retain Rule INF-R2.</p>	Accept Change to PDP – No
315.70	<p>INF-R3 Upgrading of existing aboveground infrastructure</p> <p>All Zones</p> <p>....</p>	<p>Although of limited relevance to Transpower given the NESETA, Transpower supports INF-R3.</p> <p>Relief sought Retain Rule INF-R3.</p>	Accept Change to PDP – No
315.71	<p>INF-R4 New vehicle access tracks for infrastructure</p> <p>All Zones</p> <p>....</p>	<p>Transpower supports INF-R4.</p> <p>Relief sought Retain Rule INF-R4.</p>	Accept Change to PDP – No
315.72	<p>INF-R6 Temporary infrastructure</p> <p>All Zones</p> <p>....</p>	<p>Transpower supports INF-R4.</p> <p>Relief sought Retain Rule INF-R4.</p>	Accept Change to PDP – No
315.73	<p>INF-R7 Structures associated with infrastructure including:</p> <p>1. Substations (including switching stations);</p> <p>2. Transformers;</p> <p>3. Gas transmission and distribution structures;</p> <p>4. Energy storage batteries not enclosed by a building; and</p> <p>5. Communications kiosks.</p> <p>All Zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. In the Rural Production, Rural Lifestyle or General Industrial Zones, the maximum building and structure height standard for that Zone is complied with. In all other zones INF-S6 must be complied with;</p> <p>b. Any substation, gas regulation valve and/or takeoff station or energy storage batteries are set back at least 2m from a residential site boundary;</p> <p>c. Compliance is achieved with INF-S7 and INF-S15; and</p> <p>d. Compliance is achieved with INF-S1.</p> <p>All Zones</p> <p>2. Activity Status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance with the requirements of INF-R7.1.a, INF-R7.1.b or INF-R7.1.c cannot be achieved.</p> <p>Matters of discretion are:</p>	<p>Transpower supports the provision of a rule specific to new substations, and the provision of a restricted discretionary activity status (noting Standard INF-S1 would be complied with).</p> <p>Relief sought Retain Rule INF-R7.</p>	Accept in part Change to PDP – No

	<p>1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard; and</p> <p>2. The matters set out in INF-P1, INF-P2, INF-P3, INF-P5, INF-P6 and INF-P13.</p> <p>All Zones</p> <p>3. Activity status: Non-Complying</p> <p>Where:</p> <p>a. Compliance with the requirements of INF-R7.1.d cannot be achieved.</p>		
315.74	<p>INF-R10 New overhead lines and associated support structures that convey electricity below 110kV General Rural Zone, Large Lot Residential Zone, General Industrial Zone, Light Industrial Zone, Airport Zone, Hospital Zone, Port Zone, Stadium Zone, Tertiary Education Zone</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with the following standards:</p> <p>i. INF-S3;</p> <p>ii. INF-S6;</p> <p>iii. INF-S7;</p> <p>iv. INF-S8; and</p> <p>v. INF-S12.</p> <p>General Rural Zone, Large Lot Residential Zone, General Industrial Zone, Light Industrial Zone, Airport Zone, Hospital Zone, Port Zone, Stadium Zone, Tertiary Education Zone</p> <p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance with any of the requirements of INF-R10.1 cannot be achieved.</p> <p>Matters of discretion are:</p> <p>1. The matters set out in INF-P1, INF-P2, INF-P5, INF-P6 and INF-P13.</p> <p>All other Zones</p> <p>3. Activity status: Discretionary</p>	<p>Transpower supports the provision of a rule specific to new overhead lines and associated support structures that convey electricity below 110kV, and the provision of a restricted discretionary or discretionary activity status.</p> <p>Relief sought Retain Rule INF-R10</p>	<p>Accept in part Change to PDP – No</p>
315.75	<p>INF-R15 Infrastructure buildings and structures not provided for by any other rule in this table</p> <p>All Zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with all bulk and location standards for the zone in which the building or structure is located;</p> <p>b. Compliance is achieved with INF-S7 and INF-S15; and</p> <p>c. Compliance is achieved with INF-S1.</p> <p>All Zones</p> <p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance with the requirements of INF-R15.1.a or INF-R15.1.b cannot be achieved.</p> <p>Matters of discretion are:</p> <p>1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard; and</p> <p>2. The matters set out in INF-P1, INF-P2, INF-P3, INF-P5, INF-P6 and INF-P13.</p> <p>All Zones</p> <p>3. Activity status: Non-Complying</p> <p>Where:</p> <p>a. Compliance with the requirements of INF-R15.1.c cannot be achieved.</p>	<p>Transpower supports the default rule and provided activity status.</p> <p>Relief sought Retain Rule INF-R15.</p>	<p>Accept Change to PDP – No</p>
315.76 and 315.77	<p>INF-R16 New electricity lines and associated support structures (including poles and towers) that convey electricity of 110kV or above</p> <p>All Zones</p> <p>1. Activity status: Restricted Discretionary</p> <p>Matters of discretion are:</p> <p>1. The matters set out in INF-P1, INF-P2, INF-P3, INF-P5, INF-P6 and INF-P13.</p>	<p>Transpower supports the default rule and provided restricted discretionary activity status. The rule and activity status give effect to the NPSET and in particular Policies 1 and 2.</p> <p>It is noted the cross references to policies would need to be updated on the basis a separate suite of National Grid policies is provided.</p> <p>Relief sought Retain Rule INF-R16 (but amend the policy cross references to reference the proposed National Grid specific policies).</p>	<p>Accept Change to PDP – No</p>
315.78 and 315.79 and 315.80	<p>INF-R22 Buildings, structures and activities in the National Grid Yard</p> <p>All Zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The activity is not a sensitive activity;</p> <p>b. The building or structure is not used for the handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable</p>	<p>Transpower supports INF-R22 on the basis it gives effect to Policy 10 and Policy 11 of the NPSET.</p> <p>In addition to the health and safety issues of activities locating within proximity of the National Grid, the National Grid can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/ operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines</p>	<p>Accept in part Change to PDP – Yes</p>

- intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities); and*
- c. The structure is a fence not exceeding 2.5m in height;*
 - d. The building is an uninhabited farm or horticultural structure or building (but not commercial greenhouses, protective canopies, wintering barns, produce packing facilities, or milking/dairy sheds (excluding ancillary stockyards and platforms);*
 - e. Alterations and additions to an existing building or structure for a sensitive activity, which does not involve an increase in the building height or building footprint; or*
 - f. An accessory building associated with an existing residential activity that is less than 10m in footprint and 2.5m in height;*
 - g. Infrastructure undertaken by a network utility operator as defined in the Resource Management Act 1991 or any part of electricity infrastructure that connects to the National Grid; and*
 - h. h. Compliance is achieved with INF-S12.*

All Zones

- 2. Activity status: Non-complying

Where:

- a. Compliance with INF-R22.1 cannot be achieved.

Notification status:

An application for resource consent made in respect of rule INF-R22.2 is precluded from being publicly notified.

Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedures) Regulations 2003.

The provisions sought in relation to the National Grid Yard are intended to allow for the reasonable use of land inside the transmission line corridor, with standards and rules imposed to ensure that any subdivision, land use and development that might compromise the National Grid is either managed or avoided. Specific to the 10-12 m 'National Grid Yard', Transpower is satisfied that there are some activities within the National Grid Yard that will not compromise the operation, maintenance or any upgrade of the network, due to their nature and small scale.

Certain structures (such as rural hay barns, pump sheds and implement sheds) are less problematic within 12 m of the line (noting that they will still need to be set back 12 m from National Grid support structures and meet mandatory safety clearances stipulated in other regulations) on the basis they are unlikely to "build out" a transmission line. The access or use of these structures can be restricted without causing animal welfare or business disruption issues, and they do not introduce intensive uses or heavily frequented workplaces with long durations of exposure to risk. Conversely, examples of development that should be avoided within the National Grid Yard include sensitive activities, commercial buildings and intensive uses/development, dairy sheds, piggeries, poultry sheds, and commercial greenhouses. The location of buildings and activities, particularly 'sensitive activities' such as schools and residential properties, beneath or in close proximity to lines and/or structures can also compromise Transpower's ability to maintain, upgrade and develop the National Grid. Additionally, the stability of National Grid lines can be affected by earthworks that destabilise support structures resulting in their need to be relocated.

Of particular relevance in terms of the effects of activities on the National Grid are NPSET Policies 10 and 11. These policies act as the primary guide to inform how adverse effects on the National Grid are managed. The policies seek to:

- Avoid sensitive activities near electricity transmission lines and infrastructure;
- Manage other activities to avoid reverse sensitivity effects on the Grid; and
- Manage activities to ensure the operation, maintenance, upgrading and development of the Grid is not compromised.

Notwithstanding support for the rule, amendments are sought as follows:

- Insertion of a list of non-complying activities to make it clear to plan users those activities that are not permitted. This will assist with plan interpretation and application and given the national significance of the National Grid and non-complying activity status for those activities which are not appropriate in the National Grid Yard, will provide certainty for plan users.
- On the basis of the sought non-complying activity clause b., permitted activities a. and b. relating to sensitive activities and hazardous substances can be removed as they are more appropriately addressed and framed as non-complying activities.

Relief sought

INF-R22 Buildings, structures and activities in the National Grid Yard

All Zones

- 1. Activity status: Permitted

Where:

- ~~a. The activity is not a sensitive activity;~~
- ~~b. The building or structure is not used for the handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities); and~~
- c. The structure is a fence not exceeding 2.5m in height;
- d. The building is an uninhabited farm or horticultural structure or building (but not commercial greenhouses, protective canopies, wintering barns, produce packing facilities, or milking/dairy sheds (excluding ancillary stockyards and platforms);
- e. Alterations and additions to an existing building or structure for a sensitive activity, which does not involve an increase in the building height or building footprint; or
- f. An accessory building associated with an existing residential activity that is less than 10m in footprint and 2.5m in height;
- g. Infrastructure undertaken by a network utility operator as defined in the Resource Management Act 1991 or any part of electricity infrastructure that connects to the National Grid; and
- h. Compliance is achieved with INF-S12.

All Zones

- 2. Activity status: Non-complying

Where:

- a. Compliance with INF-R22.1 cannot be achieved.
- ~~b. The following activity, building or structure:~~
 - ~~i. A change of use to a sensitive activity within existing buildings or structures;~~
 - ~~ii. The establishment of a sensitive activity;~~
 - ~~iii. Used for the handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities);~~
 - ~~v. Wintering barns, Commercial greenhouses, Immoveable protective canopies, Produce packing facilities, or Milking Sheds; or~~
 - ~~vi. Any building or structure not otherwise provided for under INF-R22.1.~~

Notification status:

An application for resource consent made in respect of rule INF-R22.2 is precluded from being publicly notified.

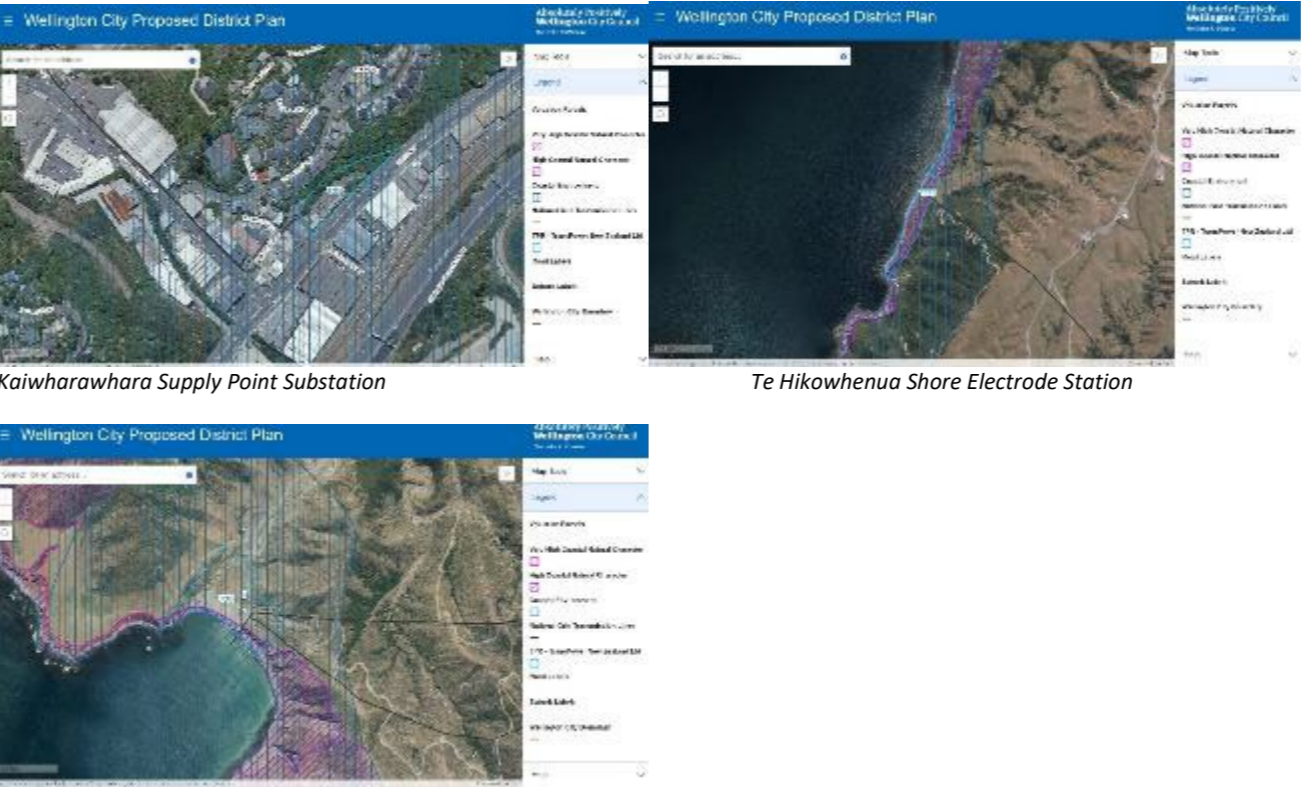
Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedures) Regulations 2003.

Amend INF-R22 as follows:

315.81	INF-S1 Health and safety All Zones	Transpower supports INF-S1. Relief sought Retain INF-S1	Accept Change to PDP – No
315.82 and 315.83	INF-S2 Underground infrastructure All Zones	Transpower supports INF-S1, noting that where used in INF-R1, it has been clarified the standard applies to existing underground infrastructure. Relief sought Retain INF-S2 but amend references in other rules.	Reject and Accept Change to PDP – No
315.84	INF-S3 Earthworks All Zones	Transpower supports INF-S3. Relief sought Retain INF-S3	Accept Change to PDP – No
315.85	INF-S4 Upgrading of aboveground infrastructure All Zones	Specific to the National Grid, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”) provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. On this basis INF-S4 is of limited relevance to Transpower, but as notified, is supported. Relief sought Retain INF-S4	Accept Change to PDP – No
315.86	INF-S6 Structures All Zones	Transpower supports INF-S7. Relief sought Retain INF-S6	Accept Change to PDP – No
315.87	INF-S7 Riparian setbacks All Zones	Transpower supports INF-S7. Relief sought Retain INF-S7	Accept Change to PDP – No
315.89 and 315.88 and 315.90	INF-S12 Buildings, structures and activities in the National Grid Yard All Zones 1. <i>The building or structure must have a minimum vertical clearance of 10m below the lowest point of a conductor under all transmission line and building operating conditions; or</i> 2. <i>Must meet the safe electrical clearance distances required by New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663 under all transmission line and building operating conditions.</i> 3. <i>The building or structure must be located at least 12m from the outer visible edge of a foundation of a National Grid transmission line tower or pole, except where it:</i> a. <i>Is a fence not exceeding 2.5m in height that is located at least:</i> i. <i>6m from the outer visible edge of a foundation of a National Grid transmission line tower; or</i> ii. <i>5m from the outer visible edge of a foundation of a National Grid transmission line pole.</i> b. <i>Is an artificial crop protection structure or crop support structure not exceeding 2.5m in height and located at least 8m from a National Grid transmission line pole that:</i> iii. <i>Is removable or temporary to allow a clear working space of 12m from the pole for maintenance; and</i> iv. <i>Allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; or</i> c. <i>Meets the requirements of clause 2.4.1 of New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.</i>	Transpower supports the Standard INF-S12 which supports INF-R22 on the basis it gives effect to Policy 10 and Policy 11 of the NPSET. Notwithstanding the support, Transpower seeks amendment to the standard as follows: <ul style="list-style-type: none">- Replacement of clause 1 and 2 with a reference to general compliance with the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001). This ensures all the safety distances are complied with for all activities (and not just clearance distances). It is noted that the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) is a code administered by MBIE that applies to all electricity lines and is not confined to the high voltage transmission lines that form the National Grid. It is important to note that while the code may adequately provide for the minimum safe electrical distances for smaller buildings and structures and some activities around transmission lines, it does not prevent under build and does not ensure the operation, maintenance, upgrade and development of the National Grid is not compromised (as required by the NPSET). As such, the code sets minimum standards. The balance of Rule INF-R22 and INF-S12 provide additional provisions to give effect to the NPSET, in particular policies 10 and 11.- Insertion of a new clause 2. relating to ensuring vehicular access is maintained to support structures. Transpower submits that access is an important component of the electricity transmission network and the associated planning framework. The NPSET provides clear a policy directive that decision makers must “recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network” (Policy 2) and ensure that “operation, maintenance, upgrading, and development of the electricity transmission network is not compromised” (Policy 10). To achieve this, physical access to transmission lines is required for all maintenance and project work, and when a system fault occurs, the Grid would need to be restored quickly to reduce impacts on businesses and communities throughout the district, and beyond. Restoring supply becomes challenging if transmission lines are difficult to access due to intensive developments that may be constructed under and around them. The rule is appropriate in the district plan as while Transpower has the legal right under the Electricity Act 1992 to access the lines, the physical ability to access the lines also needs to be protected and ensure the NPSET is given effect to, and the line is able to be operated and maintained. Resource consent at the land use stage is an appropriate time and mechanism in which to manage the effects. Regarding property rights and easement agreements, these mechanisms sit outside the RMA framework.- Renumbering of clause 3.c. to make it a subset of the exemption within clause 3.b. This means that compliance with clause 2.4.1 of NZECP as an exception, only applies to artificial crop and support structures as opposed to fences or any other activity. Relief sought Amend Standard INF-S22 as follows INF-S12 Buildings, structures and activities in the National Grid Yard All Zones 1. <i>All buildings and structures in the National Grid Yard must comply with the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663 under all transmission line and building operating conditions. The building or structure must have a minimum vertical clearance of 10m below the lowest point of a conductor under all transmission line and building operating conditions; or</i> 2. <i>Must not result in the loss of vehicular access to a National Grid support structure. Must meet the safe electrical clearance distances required by New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663 under all transmission line and building operating conditions.</i> 3. <i>The building or structure must be located at least 12m from the outer visible edge of a foundation of a National Grid transmission line tower or pole, except where it:</i>	Accept in part Change to PDP – No

		<p>a. Is a fence not exceeding 2.5m in height that is located at least:</p> <ul style="list-style-type: none"> i. 6m from the outer visible edge of a foundation of a National Grid transmission line tower; or ii. 5m from the outer visible edge of a foundation of a National Grid transmission line pole. <p>b. Is an artificial crop protection structure or crop support structure not exceeding 2.5m in height and located at least 8m from a National Grid transmission line pole that:</p> <ul style="list-style-type: none"> i. Is removable or temporary to allow a clear working space of 12m from the pole for maintenance; and ii. Allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; or iii. Meets the requirements of clause 2.4.1 of New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663. 	
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INF-CE – Tūāhanga - Takutai Moana - Infrastructure – Coastal Environment

<p>315.91</p>	<p><i>Introduction</i> <i>This sub-chapter applies to infrastructure within the Coastal Environment. It applies in addition to the principal Infrastructure chapter.</i> <i>Note: The objectives of the Infrastructure chapter apply.</i></p>	<p>Transpower has existing assets within the coastal environment, including the Kaiwharawhara Supply Point substation (designation TPR6) and underground cable, Oteranga Bay (designation TPR4) and associated lines, and Te Hikowhenua Shore Electrode Station (designation TPR5) and associated lines. Both the Oteranga Bay (designation TPR4) and Te Hikowhenua Shore Electrode Station (designation TPR5) are within areas of “High Coastal Natural Character” noting there are no existing assets within the identified “High Coastal Natural Character” outside the designations.</p>  <p><i>Kaiwharawhara Supply Point Substation</i></p> <p><i>Te Hikowhenua Shore Electrode Station</i></p> <p><i>Oteranga Bay Substation</i></p> <p>Transpower has no existing assets in area of “Very High Coastal Natural Character”.</p> <p>Transpower supports the introductory text but seeks clarification that the National Grid is subject to specific policies and rules within the sub-chapter and the general sub-chapter provisions do not apply.</p> <p>Relief sought Amend the introduction as follows:</p> <p><i>This sub-chapter applies to infrastructure within the Coastal Environment. It applies in addition to the principal Infrastructure Chapter.</i> <i>Included within the sub-chapter are provisions specific to the National Grid (NG) and Gas Transmission Pipelines Corridor (GTPC). For the avoidance of doubt, other sub-chapter policies and rules within this sub-chapter do not apply to the National Grid.</i> <i>Note: The objectives of the Infrastructure Chapter apply.</i></p>	<p>Accept in part Change to PDP – Yes</p>
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<p>315.94 and 315.92</p>	<p>INF-CE-P26 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment <i>Allow for the operation, maintenance, repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment.</i></p>	<p>Transpower has existing assets within the coastal environment, including the Kaiwharawhara Supply Point substation (designation TPR6) and underground cable, Oteranga Bay (designation TPR4) and associated lines, and Te Hikowhenua Shore Electrode Station (designation TPR5) and associated lines.</p> <p>The existing assets are regulated by the designations and the NESETA, noting that s43D RMA prescribes the relationship between designations and the NESETA. Policy P26 relates to existing National Grid assets within the Coastal Environment, and recognises the existing assets. The policy approach within P26 is supported and gives effect to Policies 2 and 5 of the NPSET. A minor amendment is sought to include “minor upgrade”, in recognition of the existing assets. A minor upgrade may be something like increasing the height of a pole support structure, or moving the same dimensioned pole within 5m of its existing location, or adding on an additional insulator.</p>	<p>Accept in part Change to PDP – No</p>
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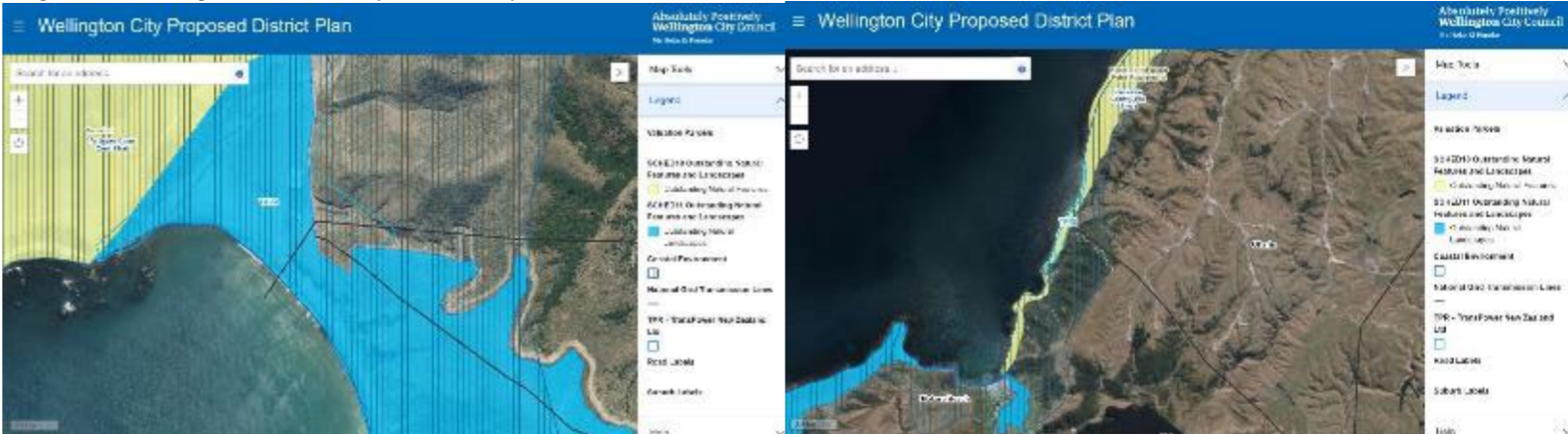
		<p>Relief sought Retain INF-CE-P26 with an amendment as follows:</p> <p>INF-CE-P26 Operation, maintenance, and repair and <u>minor upgrade</u> of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment Allow for the operation, maintenance, repair <u>and minor upgrade</u> of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment.</p> <p>Or inset a new National Grid specific policy as follows:</p> <p>INF-NG-P2 Operation, and maintenance and minor upgrade of the National Grid <u>Provide for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities.</u></p>	
315.95	<p>INF-CE-P27 Upgrading of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment:</p> <ul style="list-style-type: none"> • Outside of high coastal natural character areas; or • Outside of coastal margins or riparian margins. <p>Allow for the upgrading of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment where it is located outside of high coastal natural character areas and outside of coastal margins or riparian margins.</p>	<p>Transpower has existing assets within the coastal environment, including the Kaiwharawhara Supply Point substation (designation TPR6) and underground cable, Oteranga Bay (designation TPR4) and associated lines, and Te Hikowhenua Shore Electrode Station (designation TPR5) and associated lines. Both the Oteranga Bay (designation TPR4) and Te Hikowhenua Shore Electrode Station (designation TPR5) are within areas of “High Coastal Natural Character” noting there are no existing assets within the identified “High Coastal Natural Character” outside the designations.</p> <p>Transpower has no existing assets in area of “Very High Coastal Natural Character”.</p> <p>While Transpower’s assets in high coastal natural character areas and potentially the coastal margin are within the designations, given the relationship between designations and the NESETA (as prescribed by s43D of the RMA), works to the existing lines and cables within the designation subject to the NESETA, and that that trigger consent under the NESETA, would be subject to the PDP policies. As such P27 and P28 have implications for Transpower.</p> <p>Transpower supports P27 noting that while the coastal margin is defined, given the CMA line is not identified, it is not clear where the 10m margin area is located. This is particularly the case for more dynamic coastal environments where the CMA is not readily identifiable. Given the policy implications of defining the coastal margin, clarity is required (and sought in the submission to the definition) as to the physical application of the defined Coastal margin to enable efficient and effective plan implementation.</p> <p>Relief sought Retain Policy INF-CE-P27.</p> <p>As sought in another submission point, clearly identify the coastal margin.</p>	Accept in part Change to PDP – No
315.96	<p>INF-CE-P28 Upgrading of existing National Grid (NG) infrastructure within the coastal environment:</p> <ul style="list-style-type: none"> • Within high coastal natural character areas; or • Within coastal and riparian margins. <p>Provide for the upgrading of existing National Grid (NG) infrastructure within high coastal natural character areas or within coastal margins and riparian margins in the coastal environment where:</p> <ol style="list-style-type: none"> 1. The activity is of a scale that maintains or restores the identified values described in SCHED12 for natural character; 2. Any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated; and 3. There is a functional need or an operational need for the activity to be undertaken inside a high coastal natural character areas or within coastal margins or riparian margins in the coastal environment. 	<p>Transpower has existing assets within the coastal environment, including the Kaiwharawhara Supply Point substation (designation TPR6) and underground cable, Oteranga Bay (designation TPR4) and associated lines, and Te Hikowhenua Shore Electrode Station (designation TPR5) and associated lines. Both the Oteranga Bay (designation TPR4) and Te Hikowhenua Shore Electrode Station (designation TPR5) are within areas of “High Coastal Natural Character” and there are no existing assets within the identified “High Coastal Natural Character” outside the designations.</p> <p>Transpower has no existing assets in area of “Very High Coastal Natural Character”.</p> <p>Given the nature of the existing assets (which at Oteranga Bay are underground within the coastal margin and the High Natural Character Area and at Te Hikowhenua, are underground in the coastal margin and a single line for a small portion in the High Natural Character Area), that they are designated, and that the policy is specific to upgrades which are provided for and regulated under the NESETA, Transpower is comfortable with the policy. However, it reserves its position depending on the outcome of other submission points and relief sought as many of the National Grid provisions cannot be considered in isolation. Some minor amendments are sought to reflect that the policy considerations relate to the upgrade, thereby recognising existing assets.</p> <p>Relief sought Amend INF-CE-P28 as follows:</p> <p>INF-CE-P28 Upgrading of existing National Grid (NG) infrastructure within the coastal environment:</p> <ul style="list-style-type: none"> • Within high coastal natural character areas; or • Within coastal and riparian margins. <p>Provide for the upgrading of existing National Grid (NG) infrastructure within high coastal natural character areas or within coastal margins and riparian margins in the coastal environment where:</p> <ol style="list-style-type: none"> 1. The <u>upgrade</u> activity is of a scale that maintains or restores the identified values described in SCHED12 for natural character; 2. Any significant adverse effects <u>of the upgrade</u> are avoided and any other adverse effects are avoided, remedied or mitigated; and 3. There is a functional need or an operational need for the activity to be undertaken inside a high coastal natural character areas or within coastal margins or riparian margins in the coastal environment 	Accept in part Change to PDP – No
315.97	<p>INF-CE-P31 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment:</p> <ul style="list-style-type: none"> • Outside of high coastal natural character areas; or • Outside of coastal or riparian margins. <p>Allow for new National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment where it is located outside of high coastal natural character areas and outside of coastal or riparian margins.</p>	<p>Transpower supports INF-CE-P31 and the enabling policy directive.</p> <p>Relief sought Retain INF-CE-P31.</p>	Accept in part Change to PDP – Yes
315.98 and 315.93	<p>INF-CE-P32 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment:</p> <ul style="list-style-type: none"> • Within high coastal natural character areas; or 	<p>Transpower opposes INF-CE-P32 and as outlined in other submission points relating to the development of the National Grid, is proposing an amended policy framework specific to the National Grid.</p> <p>Transpower has concerns the policy does not give effect to the NPSET (noting the NPSET also applies to the coastal environment) in that:</p>	Accept in part Change to PDP – Yes

	<ul style="list-style-type: none"> • <i>Within coastal and riparian margins.</i> <p><i>Only allow for new National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within high coastal natural character areas and within coastal margins and riparian margins in the coastal environment where:</i></p> <ol style="list-style-type: none"> 1. <i>The activity is of a scale that maintains or restores the identified values described in SCHED12 or the natural character;</i> 2. <i>Any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated; and</i> 3. <i>There is a functional or operational need for the activity to be undertaken inside a high coastal natural character areas or within coastal margins or riparian margins in the coastal environment.</i> 	<ul style="list-style-type: none"> - The directive wording “only allow” within the policy does not reflect the enabling wording used in the NPSET. - The NPSET does not require that natural character be maintained or restored. Rather Policy 8 of the NPSET requires a ‘seek to avoid’ approach with policies 3 and 4 prescribing the matters to consider and have regard to. - The NPSET does not require significant adverse effects be avoided, rather policy 8 prescribes a seek to avoid approach. <p>It is also noted that although the National Grid is recognised of national significance within the NPSET (being a higher order policy document) it is afforded the exact same policy framework as other infrastructure (as provided in INF-CE P25). This further reinforces Transpower’s concerns the PDP does not give effect to the NPSET.</p> <p>The approach sought by in the submission seeks to reconcile both the NCZPS and the NPSETA in terms of seeking to avoid adverse effects. The RMA provides for a hierarchy of policy statements and plans. Both the NPSET and the NZCPS sit at the top of that hierarchy with neither document prevailing over the other. Instead, users must give effect to both policy statements. Transpower acknowledges there is a potential tension between the NZCPS policies for the protection of high value natural areas (Policies 11, 13, 15 – an “avoid” approach), and the NPSET policies for managing the effects of the National Grid on high value natural areas (Policy 8 - a slightly more flexible “seek to avoid” approach). Policy 8 of the NPSET provides that rather than applying a strict ‘avoid’ approach, the National Grid should ‘seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities’. Transpower’s approach to manage the policy tensions within the above national policy documents is to provide a detailed National Grid specific policy framework which addresses the circumstances in which National Grid projects can locate in coastal Outstanding Natural Features and Landscapes and High Natural Character Areas. The sought policy approach does not ‘allow’ the National Grid to be located within the coastal environment, but rather sets the policy framework for the effects of the National Grid in the coastal environment to be assessed in a considered manner. The amended wording enables a case-by case merits assessment of specific National Grid projects. This approach will allow decision-makers to have proper regard to both the NPSET and the NZCPS. When considering the effects of new National Grid Infrastructure, Policies 3 and 4 of the NPSET (which also apply to any resource consent process) require consideration of the constraints imposed by technical and operational requirements of the network, and require regard be had to the extent to which any adverse effects have been avoided, remedied or mitigated by the route site and method selection process. The approach reflects that agreed through consent order in the PNRP (Policy 13A). Included is a clause recognising that there may be some areas in the coastal environment in specified overlays where avoidance of adverse effects is required.</p> <p>Relief sought</p> <p>Delete INF-CE-P32 and insert a new National Grid specific policy as follows:</p> <p><u>INF-NG-P6 Development of the National Grid</u> <u>Provide for the development of the National Grid</u></p> <ol style="list-style-type: none"> 1. <u>In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the Commercial and Mixed-Use zones, and areas of high recreational or amenity value and existing sensitive activities.</u> 2. <u>Seek to avoid the adverse effects of the National Grid within areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED8 - Significant Natural Areas, and SCHED11 – Special Amenity Landscapes, outside the coastal environment.</u> 3. <u>Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</u> <ol style="list-style-type: none"> a. <u>Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin.</u> b. <u>Where it is not practicable to avoid adverse effects on the values of the areas in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</u> c. <u>Seeking to avoid significant adverse effects on:</u> <ol style="list-style-type: none"> i. <u>other areas of natural character</u> ii. <u>natural attributes and character of other natural features and natural landscapes</u> iii. <u>indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010</u> d. <u>Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</u> e. <u>Recognising there may be some areas within SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin, where avoidance of adverse effects is required to protect the identified values and characteristics.</u> 4. <u>Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided, to the extent practicable; and</u> 5. <u>When considering the adverse effects in respect of 1-3 above:</u> <ol style="list-style-type: none"> a. <u>Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and</u> <p><u>Consider the constraints arising from the operational needs or functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</u></p>	
315.99	<p>INF-CE-R35 Operation, maintenance, repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure: Within the coastal environment. All Zones Activity status: Permitted</p>	<p>While the rule and activity status are supported, specific to the National Grid, the existing designations, and the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. On this basis, R35 for existing National Grid infrastructure (that are otherwise captured by the NESETA and the existing designations) is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules. Transpower seeks reference to the National Grid be removed from the rule.</p> <p>Relief sought</p>	<p>Accept in part Change to PDP – Yes</p>

		Delete reference to the National Grid within INF-CE-R35	
315.100	INF-CE-R36 Upgrading of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment: <ul style="list-style-type: none"> • Outside of high coastal natural character areas; and • Outside of coastal margins or riparian margins. All Zones Activity status: Permitted	While the rule and activity status are supported, specific to the National Grid, the existing designations, and the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. On this basis, R36 for existing National Grid infrastructure (that are otherwise captured by the NESETA and the existing designations) is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules. Transpower seeks reference to the National Grid be removed from the rule. Relief sought Delete reference to the National Grid within INF-CE-R36	Accept in part Change to PDP – Yes
315.101	INF-CE-R37 Upgrading of existing National Grid (NG) infrastructure within the coastal environment: <ul style="list-style-type: none"> • Within high coastal natural character areas; or • Within coastal or riparian margins. All Zones 1. Activity status: Restricted Discretionary Matters of discretion are: 1. The matters in INF-CE-P23, CE-P5, CE-P6 and CE-P7; and The matters in PA-P1 and PA-P2	While the rule and activity status are supported, specific to the National Grid, the existing designations, and the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. On this basis, R37 for existing National Grid infrastructure (that are otherwise captured by the NESETA and the existing designations) is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules. Transpower seeks removal of the rule. Relief sought Delete Rule INF-CE-R37	Accept in part Change to PDP – Yes
315.102	INF-CE-R39 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment: <ul style="list-style-type: none"> • Outside of high coastal natural character areas; and • Outside of coastal or riparian margins. All Zone Activity status: Permitted	The NESETA does not apply to new National Grid assets. On this basis, Transpower supports the permitted rule, noting that other applicable INF chapter rules would apply. Relief sought Retain INF-CE-R39	Accept in part Change to PDP – Yes
315.103	INF-CE-R40 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment: <ul style="list-style-type: none"> • Within high coastal natural character areas; or • Within coastal or riparian margins. All Zones Activity status: Discretionary	The NESETA does not apply to new National Grid assets. On this basis, Transpower supports the default discretionary activity rule as it provides a robust consenting framework whilst still recognising the national significance of the National Grid. Relief sought Retain INF-CE-R40	Accept in part Change to PDP – Yes
INF-NFL – Tūāhanga - Ngā Hanga Māori me Ngā Nohopae - Infrastructure – Natural Features and Landscapes			
315.120	INF-NFL - General submission point	As a general comment, Transpower notes there are ten policies within the INF-NFL sub-chapter that are exclusive to the National Grid and the Gas Transmission Pipeline Corridor. Transpower submits the number of policies is excessive and they could be rationalised. Relief sought Rationalise the number of policies specific to the National Grid in the form of a revised set of National Grid specific policies .	Accept in part Change to PDP – Yes
315.121	Introduction <i>This sub-chapter applies to infrastructure within Natural Features and Landscape Overlays. It applies in addition to the principal Infrastructure Chapter.</i> <i>Note: The objectives of the Infrastructure Chapter apply.</i>	Transpower supports the introductory text but seeks clarification that the National Grid is subject to specific policies and rules (P51 – P60 and R53, R54, R56 and R57) and the general sub-chapter provisions do not apply. Relief sought Amend the introduction as follows: <i>This sub-chapter applies to infrastructure within Natural Features and Landscape Overlays. It applies in addition to the principal Infrastructure Chapter.</i> <i><u>Included within the sub-chapter are provisions specific to the National Grid (NG) and Gas Transmission Pipelines Corridor (GTPC). For the avoidance of doubt, other sub-chapter policies and rules within this sub-chapter do not apply to the National Grid.</u></i> <i>Note: The objectives of the Infrastructure Chapter apply.</i>	Accept in part Change to PDP – Yes
315.122 and 315.123 and 315.126 and 315.127	INF-NFL-P51 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops Allow for the operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops.	Policy P51 relates to existing National Grid assets within identified Ridgelines and Hilltops. The policy approach is supported and gives effect to Policies 2 and 5 of the NPSET. Notwithstanding the policy support, given the wider issues with how the policy framework within the INF-NFL chapter gives effect to the NPSET, Transpower seeks an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPSET. Relief sought Delete reference to the National Grid from INF-NFL-P51, P52 and P53. And Provide a specific National Grid policy for ONFL, SAL's and Ridgelines and Hilltops as follows:	Accept in part Change to PDP – Yes


		<p><u>INF-NFL-X Operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u> <u>Allow for the operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment), while managing the adverse effects of these activities.</u></p> <p>Or inset a new National Grid specific policy as follows:</p> <p><u>INF-NG-P2 Operation, and maintenance and minor upgrade of the National Grid</u> <u>Provide for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities.</u></p>	
315.128	<p>INF-NFL-P52 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (including within the coastal environment)</p> <p>Allow for the operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes, where:</p> <ol style="list-style-type: none"> 1. Associated earthworks and vegetation clearance are of a scale that maintains or restores the identified values described in SCHED11. 	<p>Transpower has existing assets within identified special amenity landscape areas. Transpower supports that component of the policy to “allow for the operation, maintenance and repair of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policies 2 and 5 which provide a very clear directive to ‘enable’ and ‘recognise and provide’ for the operation and maintenance (which includes repair) of the National Grid.</p> <p>However, Transpower opposes the qualifier within the policy that “associated earthworks and vegetation clearance are of a scale that maintains or restore identified values”. The policy will apply where consent is required under the NESETA in relation to existing National Grid assets. The requirement to ‘maintain or restore identified values’ fails to recognise the existing nature of the assets and that in order to ensure ongoing operation and maintenance, earthworks (for example for support structure maintenance) and vegetation trimming and clearance (to ensure safe clearance under transmission lines and ensure access is maintained on access tracks), are necessary. Policies 2 and 5 of the NPSET do not require earthworks and vegetation clearance to be of a scale that protects the identified values.</p> <p>Furthermore, the identified values in the scheduled areas (for example (Wright's Hill/Makara Peak) are very broad (being: <i>Natural Science Values (High), Sensory Factor (Moderate High), and Shared and Recognised (Very High)</i>) in that it is unclear what aspects of the values are to be maintained or restored. For example, how would tree trimming impact on the values? There is also no recognition of the existing infrastructure within the values.</p> <p>Given the uncertainty as to how the policy would be applied and that it does not give effect to the NPSET, Transpower opposes INF-NFL-P52 and instead proposes an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPSET.</p> <p>Relief sought Delete reference to the National Grid from INF-NFL-P51, P52 and P53.</p> <p>And Provide a specific National Grid policy for ONFL, SAL’s and Ridgelines and Hilltops as follows: <u>INF-NFL-X Operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u> <u>Allow for the operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment), while managing the adverse effects of these activities.</u></p>	Accept in part Change to PDP – Yes
315.129	<p>INF-NFL-P53 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes (including within the coastal environment)</p> <p>Allow for the operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, where:</p> <ol style="list-style-type: none"> 1. Associated earthworks and vegetation clearance are of a scale that protects the identified values described in SCHED10. 	<p>Existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not). The existing assets within the <i>Boom Rock/Pipinui Point Escarpment</i> Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station designation.</p> <p>Transpower supports that component of the policy to “allow for the operation, maintenance and repair of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policies 2 and 5 which provide a very clear directive to ‘enable’ and ‘recognise and provide’ for the operation and maintenance (which includes repair) of the National Grid.</p> <p>However, Transpower opposes the qualifier within the policy that “associated earthworks and vegetation clearance are of a scale that maintains or restore identified values”. The policy will apply where consent is required under the NESETA in relation to existing National Grid assets. The requirement to ‘maintain or restore identified values’ fails to recognise the existing nature of the assets and that in order to ensure ongoing operation and maintenance, earthworks (for example for support structure maintenance) and vegetation trimming and clearance (to ensure safe clearance under transmission lines and ensure access is maintained on access tracks), are necessary. Policies 2 and 5 of the NPSET do not require earthworks and vegetation clearance to be of a scale that protects the identified values.</p> <p>Furthermore, the identified values in the scheduled outstanding natural landscape area Raukawa Coast Cook Strait, are very broad (being: <i>Natural Science Values (High), Sensory Factor (Very High), and Shared and Recognised (High)</i>) in that it is unclear what aspects of the values are to be maintained or restored. For example, how would tree trimming impact on the values?</p> <p>Given the uncertainty as to how the policy would be applied and that it does not give effect to the NPSET, Transpower opposes INF-NFL-P53 and instead proposes an amended policy framework specific to the National Grid that address all the natural environment overlays. Reference is also sought to include minor upgrade within the policy to reflect the permitted activity status for minor upgrade works within the NESETA and enabling policy framework within the NPSET.</p> <p>Relief sought Delete reference to the National Grid from INF-NFL-P51, P52 and P53. and Provide a specific National Grid policy for ONFL, SAL’s and Ridgelines and Hilltops as follows: <u>INF-NFL-X Operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u></p>	Accept in part Change to PDP – Yes

		<i>Allow for the operation, maintenance, repair and minor upgrade of existing National Grid (NG) infrastructure within identified ridgelines and hilltops, special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment), while managing the adverse effects of these activities.</i>	
315.130	<p>INF-NFL-P54 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops</p> <p>Allow for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops, where:</p> <ol style="list-style-type: none"> The activities is compliant with the underlying infrastructure provisions; and Any adverse effects on the visual amenity and landscape values can be managed. 	<p>Existing National Grid assets traverse identified ridgelines and hilltops. The activity status for upgrades is regulated by the NESETA.</p> <p>Transpower supports that component of the policy to “allow for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policy 2 which provides a very clear directive to ‘recognise and provide’ for the upgrade of the National Grid, and policy 5 to ‘enable’ the minor upgrade. However, Transpower opposes matters 1 and 2, within the policy for the following reasons:</p> <ul style="list-style-type: none"> Clause 1. requires that “activities is compliant with the underlying infrastructure provisions”. The policy directive is unclear in that it is not known what are the specific infrastructure provisions to which the directive relates (are they rules which are not relevant to the National Grid given upgrades are regulated by the NESETA or are there other relevant policies?), and what is meant by the term ‘complaint with’. Clause 2. requires that adverse effects of the visual amenity and landscape values can be managed. The directive has wide implication in that it requires any adverse effects be managed, regardless of scale. Furthermore, it applies to visual amenity and landscape values, presumably of the ridgeline and hilltop. However, while ridgelines and hilltops are identified on the planning maps, their values are not defined or described in the PDP and therefore their ‘visual amenity and landscape values’ are not known or defined. As such, it is unclear what outcomes are sought by the policy. <p>It noted that ridgelines and hilltops are not a section 6 RMA matter, and are distinct from section 7 RMA significant amenity landscapes. The section 32 report to the PDP recognises them as a third tier overlay. Given the national significance of the National Grid, the enabling policy framework within the NPSET, that ridgelines and hilltops have no higher order policy support, and that the policy relates to the upgrade of existing National Grid assets, Transpower seeks amendment to exclude the qualifiers from applying to the National Grid.</p> <p>Based on the above, Transpower has concerns the policy does not give effect to the NPSET, and therefore opposes INF-NFL-P54 and instead proposes an amended policy framework specific to the National Grid.</p> <p>Relief sought Amend policy INF-NFL-P54 as follows:</p> <p>INF-NFL-P54 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops <i>Allow for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops, <u>and specific to the Gas Transmission Pipeline Corridor (GTPC)</u>, where:</i></p> <ol style="list-style-type: none"> The activities is compliant with the underlying infrastructure provisions; and Any adverse effects on the visual amenity and landscape values can be managed. 	Accept in part Change to PDP – Yes
315.131 and 315.132	<p>INF-NFL-P55 Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road</p> <p>Allow for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape where the infrastructure is located underground or within an existing legal road.</p>	<p>Transpower has no existing assets in a significant amenity landscape that is located underground or within an existing legal road. As such the policy is not applicable to the National Grid and references to the Grid shall be deleted.</p> <p>Relief sought Delete reference to the National Grid from policy INF-NFL-P55 as follows:</p> <p>INF-NFL-P55 Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located underground or within an existing legal road <i>Allow for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape where the infrastructure is located underground or within an existing legal road.</i></p>	Accept in part Change to PDP – Yes
315.133 and 315.134	<p>INF-NFL-P56 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (outside of the coastal environment) that is located underground or within an existing legal road</p> <p>Provide for the upgrading of existing infrastructure (outside CE) where the infrastructure is located underground or within an existing legal road.</p>	<p>The relationship between P55 and P56 is not clear (noting that P55 includes the proviso within the coastal environment and P56 relates to outside the coastal environment).</p> <p>Transpower has no existing assets in a significant amenity landscape that is located underground or within an existing legal road. As such the policy is not applicable to the National Grid and references to the Grid shall be deleted.</p> <p>Relief sought Delete reference to the National Grid from policy INF-NFL-P56 as follows:</p> <p>INF-NFL-P56 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within special amenity landscapes (outside of the coastal environment) that is located underground or within an existing legal road <i>Provide for the upgrading of existing infrastructure (outside CE) where the infrastructure is located underground or within an existing legal road.</i></p>	Accept in part Change to PDP – Yes
315.124 and 315.125 and 313.135	<p>INF-NFL-P57 Upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure within a special amenity landscape (including within the coastal environment) that is located aboveground and outside an existing legal road</p> <p>Provide for the upgrading of existing National Grid (NG) or Gas Transmission Pipeline Corridor (GTPC) infrastructure that is located above ground and outside an existing road reserve within a special amenity landscape where:</p> <ol style="list-style-type: none"> The activity is of a scale that maintains or restores the identified values as described in SCHED11; If located outside the coastal environment any adverse effects on the identified values can be avoided, remedied or mitigated; 	<p>Transpower has existing assets within identified areas of significant amenity landscapes. The activity status for upgrades is regulated by the NESETA.</p> <p>Transpower supports that component of the policy to “provide for the upgrading of existing National Grid infrastructure” on the basis it gives effect to the NPSET and in particular policy 2 which provides a very clear directive to ‘recognise and provide’ for the upgrade of the National Grid, and policy 5 to ‘enable’ the minor upgrade. However, Transpower opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> Clause 1. requires that activities be of a scale that maintains or restores the identified values. The term ‘at a scale’ is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPSET does not require the activity to be of a scale that protects the identified values. Furthermore, the identified values in the scheduled areas (for example (Wright's Hill/Makara Peak) are very broad (being: <i>Natural Science Values (High), Sensory Factor (Moderate High), and Shared and Recognised (Very High)</i>) in that it is unclear what aspects of the values are to be maintained or restored. Clause 2. is acceptable. 	Accept in part Change to PDP – Yes

	<p>3. <i>If located within the coastal environment any significant adverse effects on the identified values can be avoided and any other adverse effects on the identified values can be avoided, remedied or mitigated; and</i></p> <p>4. <i>There is a functional need or an operational need for the activity to be undertaken within the special amenity landscape.</i></p>	<ul style="list-style-type: none"> - Clause 3. is not applicable to the National Grid in that there are no assets within SAL's with the coastal environment. - Clause 4. is able to be complied with. <p>Based on the above, Transpower has concerns the policy does not give effect to the NPSET and therefore opposes INF-NFL-P57 and instead proposes an amended policy framework (to apply to SALs and ONFL's) specific to the National Grid. The proposed approach has a 'seek to avoid' directive, reflecting policy 8 of the NPSET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Transpower submits that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p> <p>Relief sought Delete reference to the National Grid from INF-NFL-P57 and P58,</p> <p>And</p> <p>Provide a specific National Grid policy for ONFL and SAL's as follows:</p> <p><u>INF-NFL-XX Upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u> <u>In providing for the upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment):</u></p> <ol style="list-style-type: none"> <u>1. Seek to avoid adverse effects on special amenity landscapes, and outstanding natural features and outstanding landscapes</u> <u>2. When considering major upgrades, have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection;</u> <u>3. Recognise the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects; and</u> <u>Recognise the potential benefits of upgrades to the National Grid to people and communities.</u> 	
<p>315.136 and 315.137 and 313.138</p>	<p><i>INF-NFL-P58 Upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes (including within the coastal environment)</i></p> <p><i>Provide for the upgrading of existing National Grid (NG) and Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes where:</i></p> <ol style="list-style-type: none"> <i>1. The activity is of a scale that protects the identified values described in SCHED10;</i> <i>2. The Gas Transmission Pipeline Corridor (GTPC) infrastructure is located underground or within a road reserve;</i> <i>3. If located outside the coastal environment any significant adverse effects on the identified values can be avoided and any other adverse effects on the identified values can be avoided, remedied or mitigated;</i> <i>4. If located within the coastal environment any adverse effects on the identified values can be avoided; and</i> <i>5. There is a functional need or operational need for the activity to be undertaken within the outstanding natural feature or outstanding landscape.</i> 	<p>Existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not). Transpower would want to ensure the continued upgrade of these assets given the necessity of the Cook Strait cables to the linear transmission network. The existing assets within the <i>Boom Rock/Pipinui Point Escarpment</i> Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station designation.</p> <p>Images of the existing assets and overlay features are provided below.</p>  <p><i>Oteranga Bay Substation</i> <i>Te Hikowhenua Shore Electrode Station</i></p> <p>Any upgrading of the assets outside the designations would be subject to resource consent (under the NESETA) and therefore the upgrading policy in the PDP. While upgrading of the existing assets is regulated under the NESETA, the policy would be a considered in assessing any resource consent application. Transpower supports that component of the policy to "provide for the upgrading of existing National Grid infrastructure" on the basis it gives effect to the NPSET and in particular policy 2 which provides a very clear directive to 'recognise and provide' for the upgrade of the National Grid, and policy 5 to 'enable' the minor upgrade. However, Transpower opposes the matters within the policy for the following reasons:</p> <ul style="list-style-type: none"> - Clause 1. requires that activities be of a scale that protects the identified values. The term 'at a scale' is subjective and does not recognise the characterises and technical and operational requirements and constraints of the National Grid. The NPSET does not require the activity to be of a scale that protects the identified values. Furthermore, the identified values in the scheduled areas (for example Raukawa Coast Cook Strait), are very broad (being: Natural Science Values (High), Sensory Factor (Very High), and Shared and Recognised (High)) and therefore it is unclear what aspects of the values are to be protected. Furthermore, the requirement to 'protect' the existing values fails to recognise the existing infrastructure. It could be argued that any work to existing infrastructure does not protect existing values. - Clause 2. is not applicable to the National Grid. - Clause 3. applies outside the CE and is therefore only applicable at Oteranga Bay. Again, the policy directive fails to acknowledge existing infrastructure and the policy directive to "avoid significant adverse effect" does not give effect to the NPSET. 	<p>Accept in part Change to PDP – Yes</p>

		<ul style="list-style-type: none"> - Clause 4. applies to the CE and requires adverse effects be avoided. This policy directive extends beyond that required in the NPSET and has no basis or justification. - Clause 5. is acceptable and can be met in that given the assts are existing, there will be an operational need for the upgrade. <p>Based on the above, Transpower has concerns the policy does not give effect to the NPSET and therefore opposes INF-NFL-P58 and instead proposes an amended policy framework (to apply to SALs and ONFL's) specific to the National Grid. The proposed approach has a 'seek to avoid' directive, reflecting policy 8 of the NPSET and provides a more appropriate and comprehensive policy framework that recognises the existing assets. Transpower submits that utilisation and upgrading of existing National Grid assets should be facilitated in that it makes use of existing assets and will generally have less adverse environmental effect than that associated with the creation of new assets.</p> <p>Relief sought Delete reference to the National Grid from INF-NFL-P57 and P58, and Provide a specific National Grid policy for ONFL and SAL's as follows:</p> <p><u>INF-NFL-XX Upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment)</u> <i>In providing for the upgrade of existing National Grid (NG) infrastructure within special amenity landscapes, and outstanding natural features and outstanding landscapes (including within the coastal environment):</i></p> <ol style="list-style-type: none"> 1. <u>Seek to avoid adverse effects on special amenity landscapes, and outstanding natural features and outstanding landscapes.</u> 2. <u>When considering major upgrades, have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection.</u> 3. <u>Recognise the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</u> 4. <u>Recognise the potential benefits of upgrades to the National Grid to people and communities; and</u> <p><u>Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided.</u></p>	
<p>315.54 and 315.139</p>	<p><i>INF-NFL-P59 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment</i> <i>Avoid new National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within the coastal environment.</i></p>	<p>It is not clear why P59 is within the NFL chapter given it relates to the CE and not NFL's.</p> <p>Notwithstanding the above, as with other INF-NFL policies, Transpower opposes INF-NFL-P59. Policy P59 has implications for any new Cook Strait cables at Oteranga Bay, as well as any other new National Grid assets within the CE within the entire city. The avoid directive within the policy does not give effect to the NPSET, including Policy 8, noting that it applies to the entire coastal environment and not only the higher values areas. The higher order policy support for the policy is not clear noting the NZCPS does not impose a blanket avoid requirement for the coastal environment, within Policy 6(1)(a) recognising the provision of infrastructure and the transmission of electricity. The PDP policy is outright opposed and Transpower seeks its deletion. A new policy is proposed that provides a comprehensive policy approach that gives effect to and reconciles the NPSET and NZCPS. Given the comprehensive nature of the policy, it is proposed to be located in the INF chapter rather than sub chapters.</p> <p>Relief sought Delete INF-NFL-P59 and insert a new National Grid specific policy as follows: <u>INF-NG-P6 Development of the National Grid</u> <i>Provide for the development of the National Grid</i></p> <ol style="list-style-type: none"> 1. <u>In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the Commercial and Mixed-Use zones, and areas of high recreational or amenity value and existing sensitive activities.</u> 2. <u>Seek to avoid the adverse effects of the National Grid within areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED8 - Significant Natural Areas, and SCHED11 – Special Amenity Landscapes, outside the coastal environment.</u> 3. <u>Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</u> <ol style="list-style-type: none"> a. <u>Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin.</u> b. <u>Where it is not practicable to avoid adverse effects on the values of the areas in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</u> c. <u>Seeking to avoid significant adverse effects on:</u> <ol style="list-style-type: none"> i. <u>other areas of natural character</u> ii. <u>natural attributes and character of other natural features and natural landscapes</u> iii. <u>indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010</u> d. <u>Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</u> e. <u>Recognising there may be some areas within SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin, where avoidance of adverse effects is required to protect the identified values and characteristics.</u> 4. <u>Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided, to the extent practicable; and</u> 5. <u>When considering the adverse effects in respect of 1-3 above:</u> <ol style="list-style-type: none"> a. <u>Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and</u> b. <u>Consider the constraints arising from the operational needs or functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</u> 	<p>Accept in part Change to PDP – Yes</p>

<p>315.55 and 315.140</p>	<p><i>INF-NFL-P60 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops, outside the coastal environment</i> <i>Only allow for new National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure where:</i></p> <ol style="list-style-type: none"> <i>The activity is of a scale that protects the identified outstanding natural feature or outstanding landscape values described in SCHED11;</i> <i>The activity is of a scale that maintains or restores the identified special amenity landscape values described in SCHED11;</i> <i>The activity avoids visually obtrusive structures within the identified ridgeline or hilltop and maintains the visual continuity of undeveloped skyline;</i> <i>Any significant adverse effects are avoided and any other adverse effects are avoided, remedied or mitigated; and</i> <i>There is a functional need or an operational need for the activity and associated earthworks and vegetation clearance to be undertaken inside the overlay and there are no reasonably practical alternative locations outside of these areas to minimise the impact.</i> 	<p>As with other NFL provisions, Transpower opposes INF-NFL-P60 and as outlined in other comments, is proposing an amended policy framework specific to the National Grid.</p> <p>Transpower has specific concerns the policy does not give effect to the NPSET in that:</p> <ul style="list-style-type: none"> - Specific to clause 1. 2. and 3. the NPSET does not require the activity to be of a scale that protects the identified values for ONFL's, not maintains or restores those for SAL's. Furthermore, it does not require the avoidance of visually obtrusive structures within ridgelines and hilltops. The ridgelines and hilltops cover a large extent of the city and given the linear nature of the transmission network and the visual element associated with its support structures, it would not be possible or practicable to 'avoid visually obtrusive structures. - In response to clause 4. the NPSET does not require significant adverse effects be avoided. - Clause 5. is acceptable in so far as it relates to functional or operational need. However, the reference to 'reasonably practical alternative locations' is not necessary given the definitions of operational and functional need which provide clear parameter as to the necessity of the activity to occur in that location. Transpower also has concerns with the term 'practical' as it is not a commonly used planning term and therefore introduces uncertainty in how the policy could be interpreted and applied. The term 'practicable' is more readily understood. <p>Based on the above, Transpower has concerns the policy does not give effect to the NPSET and therefore seeks its deletion. A new policy is proposed that provides a comprehensive policy approach that gives effect to and reconciles the NPSET Given the. comprehensive nature of the policy, it is proposed to be located in the INF chapter rather than sub chapters.</p> <p>Relief sought Delete INF-NFL-P60 and insert a new National Grid specific policy as follows: <u>INF-NG-P6 Development of the National Grid</u> <u>Provide for the development of the National Grid</u></p> <ol style="list-style-type: none"> <u><i>In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the Commercial and Mixed-Use zones, and areas of high recreational or amenity value and existing sensitive activities.</i></u> <u><i>Seek to avoid the adverse effects of the National Grid within areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED8 - Significant Natural Areas, and SCHED11 – Special Amenity Landscapes, outside the coastal environment.</i></u> <u><i>Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</i></u> <ol style="list-style-type: none"> <u><i>Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin.</i></u> <u><i>Where it is not practicable to avoid adverse effects on the values of the areas in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</i></u> <u><i>Seeking to avoid significant adverse effects on:</i></u> <ol style="list-style-type: none"> <u><i>other areas of natural character</i></u> <u><i>natural attributes and character of other natural features and natural landscapes</i></u> <u><i>indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010</i></u> <u><i>Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</i></u> <u><i>Recognising there may be some areas within SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin, where avoidance of adverse effects is required to protect the identified values and characteristics.</i></u> <u><i>Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided, to the extent practicable; and</i></u> <u><i>When considering the adverse effects in respect of 1-3 above:</i></u> <ol style="list-style-type: none"> <u><i>Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and</i></u> <u><i>Consider the constraints arising from the operational needs or functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</i></u> 	<p>Accept Change to PDP – Yes</p>
<p>315.141 and 315.142</p>	<p><i>INF-NFL-R53 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment)</i> <i>All Zones</i></p> <ol style="list-style-type: none"> <i>Activity status: Permitted</i> 	<p>Existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not), Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city. The existing assets within the <i>Boom Rock/Pipinui Point Escarpment</i> Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station Designation (ID: TPR5) and are therefore no subject to any rule.</p> <p>Notwithstanding the above, specific to the National Grid, the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. On this basis, R53 for existing National Grid structures captured by the NESETA is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules.</p> <p>Transpower seeks reference to the National Grid be removed from the rule.</p> <p>Relief sought Delete reference to the National Grid from Rule INF-NFL-R53 as follows:</p> <p><u>INF-NFL-R53 Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops (including within the coastal environment)</u> <i>All Zones</i> <i>Activity status: Permitted</i></p>	<p>Accept in part Change to PDP – Yes</p>
<p>315.143</p>	<p><i>INF-NFL-R54 Upgrading of existing National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops</i> <i>All Zones</i></p>	<p>Existing National Grid assets traverse Outstanding Natural Landscapes (at Oteranga Bay noting that while some of the assets are within the Oteranga Bay designation, others are not), Special Amenity Landscapes across the city, and Ridgelines and Hilltops across the city. The existing assets within the <i>Boom Rock/Pipinui Point</i></p>	<p>Accept in part Change to PDP – Yes</p>

	<p>1. Activity status: <i>Restricted Discretionary</i></p> <p>Where:</p> <p>a. The infrastructure is located outside the coastal environment.</p> <p>Matters of discretion are:</p> <p>1. The matters in INF-NFL-P54, INF-NFL-P55, INF-NFL-R56, INF-NFL-R57 and INF-NFLR58.</p> <p>2. Activity status: <i>Discretionary</i></p> <p>Where:</p> <p>a. Compliance with the requirements of INF-NFL-R54.1a cannot be achieved.</p>	<p><i>Escarpment</i> Outstanding Natural Features overlay are within the Transpower Te Hikowhenua Shore Electrode Station Designation (ID: TPR5) and are therefore no subject to any rule.</p> <p>Notwithstanding the above, specific to the National Grid, the NESETA provides prevailing provisions for the upgrading of the National Grid. It is noted the NESETA provides a Discretionary activity status under Regulations 39 of the NESETA for those activities subject to the NESETA but not otherwise captured under other regulations in the NESETA.</p> <p>On this basis, R54 for existing National Grid structures captured by the NESETA is of no relevance to Transpower in respect of rule application and only adds confusion and potential errors in the application of rules.</p> <p>Transpower seeks the rule be deleted.</p> <p>Relief sought Delete Rule INF-NFL-R54.</p>	
<p>315.144 and 315.145</p>	<p>INF-NFL-R56 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, special amenity landscapes or identified ridgelines and hilltops</p> <p>1. Activity Status: <i>Discretionary</i></p>	<p>The NESETA does not apply to new National Grid assets. On this basis, Transpower supports the default discretionary activity rule as it provides a robust consenting framework whilst still recognising the national significance of the National Grid.</p> <p>Notwithstanding its support for a discretionary activity status, Transpower does query whether a discretionary activity status is appropriate for Ridgelines and Hilltops and seeks a restricted discretionary activity status for Ridgelines and Hilltops. Transpower is concerned Ridgelines and Hilltops are afforded the same policy framework as ONFL's even they are not section 6 RMA matters. The rationalise and even need for the Ridgelines and Hilltops is not evident given the identification of ONFLs and SALs.</p> <p>Relief sought Retain INF-NFL-R56 in so far as it relates to Outstanding natural features and Outstanding landscapes, and Special amenity landscapes but amend the activity status for Hilltops and Ridgelines to restricted discretionary.</p> <p>INF-NFL-R56 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, and special amenity landscapes or identified ridgelines and hilltops</p> <p>1. Activity Status: <i>Discretionary</i></p> <p>INF-NFL-R56 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within identified ridgelines and hilltops</p> <p>1. Activity Status: <i>Restricted Discretionary</i></p>	<p>Accept in part Change to PDP – Yes</p>
<p>315.146 and 315.147</p>	<p>INF-NFL-R57 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, within the coastal environment</p> <p>All Zones</p> <p>1. Activity status: <i>Non-Complying</i></p>	<p>As shown in the image below, the entire southern and western coastline with the city is identified as ONFL.</p>  <p><i>PDP Identified ONFL's across the city</i></p> <p>Transpower opposes the non-complying activity status on the basis it does not give effect to the NPSET. The rule and associated policy framework would mean essential and nationally significant (as recognised in the NPSET) new National Grid assets (such as a new Cook Strait Cable within the existing Cook Strait Cable Protection Zone) would potentially not be able to secure consent in that it would be subject to a non-complying activity status and an 'avoid' policy directive (under P59) and therefore unable to pass the s104 RMA 'gateway test'.</p> <p>The activity status does not give effect to the NPSET.</p> <p>Relief sought Amend the activity status for the new National Grid infrastructure within Rule R57 from non-complying to discretionary activity status, as follows:</p> <p>INF-NFL-R57 New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within outstanding natural features and outstanding landscapes, within the coastal environment</p> <p>All Zones</p> <p>1. Activity status: <i>Non-Complying</i></p> <p>INF-NFL-R57a New National Grid (NG) infrastructure within outstanding natural features and outstanding landscapes, within the coastal environment</p> <p>All Zones</p> <p>1. Activity status: <i>Discretionary</i></p>	<p>Accept in part Change to PDP – Yes</p>

315.148	<p><i>INF-NFL-S21 Earthworks</i> All Zones</p> <ol style="list-style-type: none"> 1. Earthworks must not exceed: <ol style="list-style-type: none"> a. More than 50m per transmission line support structure; or b. 100m per access track. <p>Assessment criteria:</p> <ol style="list-style-type: none"> 1. Functional needs or operational needs of infrastructure; and 2. The effect of the activity and removal on the identified biodiversity values of the significant natural area and the measures taken to avoid, minimise or remedy the effects and where relevant the ability to offset biodiversity impacts. 	<p>Standard S21 is applied to Rule INF-NFL-R48 which is not applicable to the National Grid. On that basis Transpower is neutral on S21. If the intent is for S21 to apply to the National Grid (under Rules R53, 56 and 57) Transpower opposes its application as it either duplicates the NESETA or has not basis for inclusion as a standard for new National Grid assets.</p> <p>Relief sought On the basis it is not applicable to the National Grid, retain S21.</p>	Accept Change to PDP – No
INF-NH – Tūāhanga - Ngā Mōrearea ā-Taiao Infrastructure – Natural Hazards			
315.149	<p><i>INF-NH-P61 Infrastructure and structures in Natural Hazard and Coastal Hazard Overlays</i> Only allow for new infrastructure, and any associated structures in the Natural Hazard Overlays and Coastal Hazard Overlays where the infrastructure or associated structures:</p> <ol style="list-style-type: none"> 1. Do not increase the risk from the natural hazard to people, or other property or infrastructure; 2. Incorporate design measures to reduce the potential for damage to the infrastructure following a natural hazard or coastal hazard event; and 3. When located in an overland flowpath, stream corridor, or high coastal hazard Area, have a functional need or operational need that means the infrastructure's location cannot be avoided and there are no reasonable alternatives. 	<p>Transpower generally supports INF-NH-P61 as it provides an appropriate policy framework in which to consider both new and existing infrastructure within hazard areas. Specific to the National Grid, given the linear nature of the Grid, while it can be designed in a manner that does not place the National Grid, people or properties at risk (nor exacerbate any risks), it cannot always avoid locating within or traversing through hazard overlays (and particularly stream corridors and ponding areas and fault lines).</p> <p>Relief sought Retain policy INF-NH-P61.</p>	Accept in part Change to PDP – No
315.150	<p><i>INF-NH-R58 New underground infrastructure (including customer connections), and maintenance or upgrading of existing underground infrastructure in Natural Hazard and Coastal Hazard Overlays</i> All zones</p> <ol style="list-style-type: none"> 1. Activity status: Permitted <p>Where:</p> <ol style="list-style-type: none"> a. The underground infrastructure does not result in a permanent change to the ground level within the: <ol style="list-style-type: none"> i. Ponding or overland flowpath areas of the flood hazard extent; or ii. Stream corridor area of the flood hazard extent; and b. The underground infrastructure is not located within the high hazard area of the Coastal Hazard Overlays; or c. If the underground infrastructure is located within the high hazard area of the Coastal Hazard Overlay it is also within the City Centre Zone. <p>All Zones</p> <ol style="list-style-type: none"> 2. Activity status: Restricted Discretionary <p>Where:</p> <ol style="list-style-type: none"> a. Compliance with the requirements of INF-NH-R58.a or INF-NH-R58.b cannot be achieved. <p>Matters of discretion are:</p> <ol style="list-style-type: none"> 1. The matters set out in INF-NH-P61. 	<p>Transpower currently has underground assets within the Ohariu Fault (at the Karori Golf Club) and the within the Overland Flowpath and Inundation Area at Kaiwharawhara Road.</p> <p>Specific to the National Grid, the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid, and on this basis, Rules R58 and R59 (with limits), for existing National Grid structures captured by the NESETA are of limited relevance to Transpower in respect of rule application. It is noted the NESETA provides a Discretionary activity status under Regulations 39 of the NESETA for those activities subject to the NESETA but not otherwise captured under other regulations in the NESETA.</p> <p>Notwithstanding the application of the NESETA, the maintenance and upgrade of the existing underground assets would be able to comply with the permitted activity standards.</p> <p>Transpower supports the restricted discretionary activity status for the assets as coupled with the policy framework, the rule provides a robust but pragmatic framework in which to consider infrastructure in hazard areas.</p> <p>Relief sought Retain INF-NH-R58.</p>	Accept Change to PDP – No
315.151	<p><i>INF-NH-R59 Temporary infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays</i> All Zones</p> <ol style="list-style-type: none"> 1. Activity status: Permitted <p>Where:</p> <ol style="list-style-type: none"> a. The temporary infrastructure is not located within the: <ol style="list-style-type: none"> i. Overland flowpath area of the flood hazard extent; ii. Stream corridor area of the flood hazard extent; or iii. The high hazard area of the Coastal Hazard Overlay outside of the City Centre Zone. <p>All Zones</p> <ol style="list-style-type: none"> 2. Activity status: Restricted Discretionary <p>Where:</p> <ol style="list-style-type: none"> a. Compliance with the requirements of INF-NH-R59.1.a cannot be achieved. <p>Matters of discretion are:</p> <ol style="list-style-type: none"> 1. The matters set out in INF-NH-P61. 	<p>Transpower supports the permitted and default restricted discretionary activity status for temporary infrastructure as coupled with the policy framework, the rule provides a robust but pragmatic framework in which to consider infrastructure in hazard areas.</p> <p>Relief sought Retain INF-NH-R59</p>	Accept Change to PDP – No
315.152	<p><i>INF-NH-R60 New above ground infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays</i> All zones</p> <ol style="list-style-type: none"> 1. Activity status: Permitted <p>Where:</p> <ol style="list-style-type: none"> a. The infrastructure is located within: <ol style="list-style-type: none"> i. The ponding area of the flood hazard extent; ii. The low and medium hazard areas of the Coastal Hazard Overlays; 	<p>Given the linear nature of the National Grid and locational constraints, while Transpower would endeavour to avoid locating new National Grid assets within hazard overlays, it is not always possible. Transpower therefore supports the restricted discretionary activity status for new assets which are not permitted as coupled with the policy framework, the activity status, the rule provides a robust but pragmatic framework in which to consider infrastructure in hazard areas.</p> <p>Relief sought Retain INF-NH-R60</p>	Accept Change to PDP – No

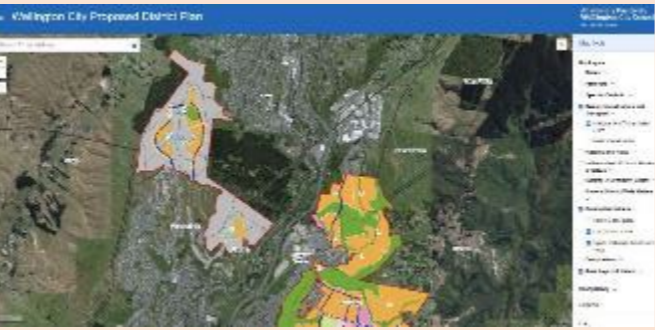
	<p>iv. The Sheppards Gully Fault Overlay, Ohariu Fault Overlay or the Terawhiti Fault Overlay;</p> <p>iii. The Liquefaction Overlay; or</p> <p>v. High hazard area of the Coastal Hazard Overlay within the City Centre Zone.</p> <p>All Zones</p> <p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. The infrastructure is located within the:</p> <p>i. Overland flowpath area of the flood hazard extent;</p> <p>ii. The Wellington Fault Overlay;</p> <p>iv. Stream corridor of the flood hazard extent; or</p> <p>v. High hazard area of the Coastal Hazard Overlay outside of the City Centre Zone.</p> <p>Matters of discretion are:</p> <p>1. The matters set out in INF-NH-P61.</p>		
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INF-OL – Tūāhanga - Ētahi anō Inaki Infrastructure – Other Overlays

<p>315.153</p>	<p>INF-OL-P62 Adverse effects of infrastructure on:</p> <p>1. Historic heritage;</p> <p>2. Notable trees;</p> <p>3. Sites and areas of significance to Māori; and</p> <p>4. Viewshafts.</p> <p>In the overlays identified in clauses 1-4 above:</p> <p>a. Give priority to avoiding the adverse effects of substantial upgrades to, or the development of new infrastructure, on the values and attributes of the above overlays; and</p> <p>b. Where the avoidance of adverse effects under clause a. is not possible, the appropriateness of the substantial upgrades to, or the development of, new infrastructure will be determined by having regard to the matters listed in INF-P6.</p>	<p>In terms of existing National Grid assets, in addition to single sites and features, the National Grid traverses the heritage area at Wilton (being the Otari Native Botanic Garden), the Old Coach Road in Johnsonville, a number of Sites of Significance to Māori (lines), Sites of Significance to Maori (Extent) including Kumuhore Ngakingaan and Ohariu-te Ika a Maru Takiwā, and a Site and Area of Significance to Maori at Oteranga Bay.</p> <p>While Transpower endeavours to avoid the overlay areas identified in INF-OL-P62, given the linear nature of the National Grid and its associated operational and technical constraints, avoidance is not always practicable.</p> <p>Transpower supports reference within the policy to INF-P6.</p> <p>In terms of the specific wording of the policy, Transpower makes the following comments:</p> <ul style="list-style-type: none"> The term 'give priority' is not a common planning term and may give rise to interpretation issues. Does it in effect mean avoid? If so, it is opposed and Transpower instead recommends the term be amended to 'Seek' Transpower does not support the term 'where possible' as it sets a very high bar. In reality, most things are possible. The term 'practicable' is more widely understood and has been agreed through consent order in the Greater Wellington Regional Council Proposed Natural Resource Plan. Transpower would support this term. <p>Relief sought Amend INF-OL-P62 as follows: INF-OL-P62 Adverse effects of infrastructure on:</p> <p>1. Historic heritage;</p> <p>2. Notable trees;</p> <p>3. Sites and areas of significance to Māori; and</p> <p>4. Viewshafts.</p> <p>In the overlays identified in clauses 1-4 above:</p> <p>a. Give priority Seek to avoiding the adverse effects of substantial upgrades to, or the development of new infrastructure, on the values and attributes of the above overlays; and</p> <p>Where the avoidance of adverse effects under clause a. is not possible-practicable, the appropriateness of the substantial upgrades to, or the development of, new infrastructure will be determined by having regard to the matters listed in INF-P6.</p>	<p>Accept in part Change to PDP – Yes</p>
<p>315.154</p>	<p>INF-OL-R61 Maintenance or upgrading of existing underground infrastructure in Other Overlays</p>	<p>The rule and accompanying activity status are supported, noting the NESETA applies to existing National Grid assets and there are no existing underground National Grid assets within the Other Overlay areas (noting the cable at Oteranga Bay that is within a Site of Significance to Māori is in the CMA and therefore outside the jurisdiction of the District Plan). The cable is also within the substation designation.</p> <p>Relief sought Retain Rule INF-OL-R61</p>	<p>Accept in part Change to PDP – No</p>
<p>315.155</p>	<p>INF-OL-R62 New underground infrastructure in Other Overlays</p> <p>All Zones</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The infrastructure is located on site identified in SCHED5 (viewshafts).</p> <p>All Zones</p> <p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. The infrastructure is located on a site identified in any of the following schedules:</p> <p>i. SCHED1 (Heritage buildings);</p> <p>ii. SCHED2 (Heritage structures);</p> <p>iii. SCHED3 (Heritage areas);</p>	<p>Transpower supports the activity status and framework for new underground infrastructure within the defined Other Overlay areas. While Transpower endeavours to avoid the Overlay areas identified in INF-OL-P62, given the linear nature of the National Grid and its associated operational and technical constraints, avoidance is not always practicable.</p> <p>Relief sought Retain Rule INF-OL-R62</p>	<p>Accept in part Change to PDP – No</p>

	<p>iv. SCHED4 (Archaeological sites); v. SCHED6 (Notable trees); and vi. SCHED7 (Sites and areas of significance to Māori).</p> <p>Matters of discretion are: 1. The matters set out in INF-OL-P62.</p> <p>Note: This rule only has immediate legal effect for Overlays relating to historic heritage, sites and areas of significance to Māori and significant natural areas.</p>		
315.156	INF-OL-R64 Operation, maintenance and repair, or removal, of existing aboveground infrastructure in Other Overlays	The rules and accompanying activity status are supported, noting the NESETA applies to existing National Grid assets.	Accept Change to PDP – No
315.157	INF-OL-R65 Upgrading of existing aboveground infrastructure in Other Overlays	The rules and accompanying activity status are supported, noting the NESETA applies to existing National Grid assets.	Accept Change to PDP – No
315.158	<p>INF-OL-R66 New aboveground infrastructure and temporary infrastructure in Other Overlays not otherwise provided for All Zones</p> <p>1. Activity Status: Restricted Discretionary</p> <p>Matters of discretion are: 1. The matters set out in INF-OL-P62.</p> <p>Note: This rule only has immediate legal effect for Overlays relating to historic heritage, sites and areas of significance to Māori and significant natural areas.</p>	<p>Transpower supports the activity status and framework for new aboveground and temporary infrastructure within the defined Other Overlay areas. While Transpower endeavours to avoid the Overlay areas identified in INF-OL-P62, given the linear nature of the National Grid and its associated operational and technical constraints, avoidance is not always practicable.</p> <p>Relief sought Retain Rule INF-OL-R66</p>	Accept Change to PDP – No

Mapping

315.9	Mapping – Energy Infrastructure and Transpower – National Grid Transmission Lines	<p>Transpower supports the National Grid Transmission Line layer on the planning maps as its assist in plan interpretation. Policy 12 of the NPSET requires territorial authorities to “identify the electricity transmission network on their relevant planning maps whether or not the network is designated”. Given the need for provisions that also relate to the National Grid Yard, Transpower supports the mapping as notified. The mapping layer works with the definitions of National Grid Yard and National Grid Subdivision Corridor to define the required setbacks.</p> <p>Relief sought Retain the map layer for the National Grid on the planning maps.</p>	Not specifically addressed in S42A Report
315.10	Mapping – Development Areas	<p>When using the on-line maps, the Development Area spatial layer over-rides the National Grid Transmission Line layer. Plan users may not realise the area is subject to the National Grid corridor provisions. Refer image below.</p>  <p>Relief sought Amend the planning map layers so the National Grid Transmission line remains visible when all map layers are applied.</p>	Not specifically addressed in S42A Report