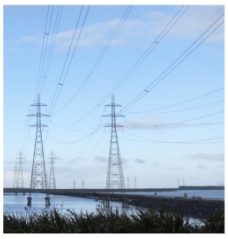
Submission by Transpower New Zealand Limited on the Proposed Waitomo District Plan

22 December 2022

Keeping the energy flowing

TRANSPOWER

Transpower New Zealand Limited The National Grid

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Proposed Waitomo District Plan

SUBMISSION FORM

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5

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districtplan@waitomo.govt.nz
www.waitomo.govt.nz

Closing date for submissions: 12pm on 23 December 2022

SUBMITTER DETAILS: *(please note that the (*) are required fields and must be completed)*

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Please tick your preferred method of contact * ☑ Email ☐ Postal	Correspondence to * ☑ Submitter ☐ Agent ☐ Both

Trade competition and adverse effects: *

☐ I could ☑ I could not gain an advantage in trade competition through this submission.

Only if you ticked "I could" above, please answer this question:
I am/am not directly affected by an effect of the subject matter of the submission that:
(a) adversely affects the environment; and
(b)does not relate to trade competition or the effects of trade competition.

Note to person making submission:
If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Would you like to present your submission in person at a hearing? ☑ Yes ☐ No

If others make a similar submission I will consider presenting a joint case with them at the hearing.

☐ Yes ☑ No

Please complete a line for every submission point, adding as many additional lines as you need:

The specific provisions of the proposal that my submission relates to **e.g provision number, map number**	**Do you:** • **Support?** • **Oppose?** • **Amend?**	**What decision are you seeking from Council?** **What action would you like:** • **Retain?** • **Amend?** • **Add?** • **Delete?**	**Reasons**
e.g SD-O5	*e.g Support*	*e.g Retain Objective SD-O5*	*e.g It will help to reduce adverse effects between activities and ensure resources are used efficiently*
Refer attached submission and table			

Signed: _____ Date: 23 December 2022

(A signature is not required if you make your submission by electronic means)

PRIVACY ACT NOTE: Please note that all information provided in your submission will be used to progress the process for this proposed district plan, and may be made publicly available.

Submission # ……. Customer # ……. Property # …….

Submission by Transpower New Zealand Limited on the Proposed Waitomo District Plan

Introduction

Transpower New Zealand Limited (Transpower) welcomes the opportunity to provide feedback on the Proposed Waitomo District Plan ("**PDP**"). The following provides an overview of Transpower's role and function including;

- a description of Transpower assets in the Waitomo District;
- an overview of the Resource Management Act 1991 (RMA) statutory framework as it relates to Transpower's assets and functions; and
- specific comments on provisions of the PDP.

Overview

The following comments are provided to inform the PDP to ensure that its corresponding planning framework appropriately recognises and provides for the National Grid.

From Transpower's perspective, the provisions of the District Plan need to ensure:

- The National Policy Statement on Electricity Transmission 2008 ("**NPSET**") is given effect to;
- The sustainable management of the National Grid as a physical resource of national significance is recognised;
- The benefits of the National Grid at local, regional and national levels are recognised and provided for;
- The need for the operation, maintenance, upgrade and development of the electricity transmission network is recognised and provided for; and
- The protection of the National Grid from issues of reverse sensitivity and the adverse effects of others' activities is recognised to ensure the National Grid is not compromised.

Introduction to Transpower

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. The National Grid links electricity generators directly to major industrial users and distribution companies, feeding electricity to the local networks that distribute electricity to homes and businesses. The role of Transpower is shown in Figure 1 below. The National Grid comprises towers, poles, lines, cables substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of around 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

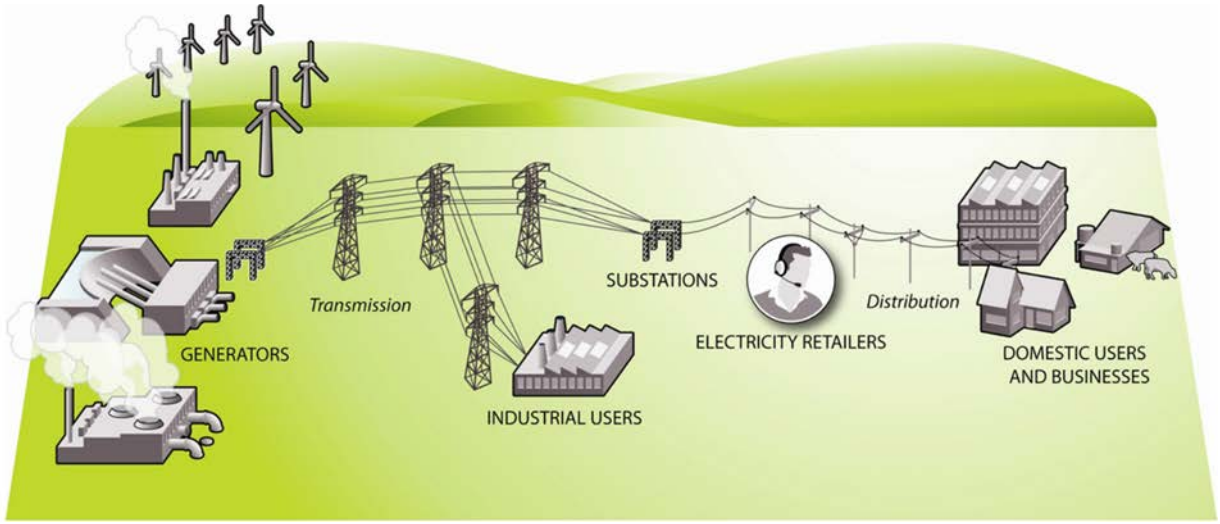


Figure 1. Role of Transpower in New Zealand's electricity industry. (Source: MBIE)

Transpower's role as outlined in its Statement of Corporate Intent for July 2022, states that:

> *Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:*
>
> *- As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users, and*
>
> *- As system operator, to operate a competitive electricity market and deliver a secure power system*

In line with the above, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's "Whakamana i Te Mauri Hiko" predicts that electricity demand is likely to increase around 55% by 2050. Whakamana i Te Mauri Hiko suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, the New Zealand Electricity Code of Practice for Electricity Safe Distances (NZECP 34:2001), and the Electricity (Hazards from Trees) Regulations 2003.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Waitomo Area Assets

The following National Grid assets are within the Waitomo District.

- Arapuni – Ongarue A (ARI-ONG-B) 110 kV Single Circuit line on Pi Poles
- Arapuni – Ongarue B (ARI-ONG-B) 110 kV Single Circuit line on Steel Towers
- Huntly – Taumarunui A (HLY-TMN A) 220 kV Double Circuit line on Steel Towers
- Rangitoto Hills – Hangatiki A line (RTO-HTI A) 110 kV Double Circuit line on Steel Towers
- Hangatiki - Te Awamutu A (HTI-TMU-A 110 kV) 110 kV line - leased
- Rangitoto Hills Tee Site

There is also one substation in the district (Hangatiki).

Refer to **Appendix A** for a map showing the location of these assets.

Statutory Framework

The National Policy Statement on Electricity Transmission ("**NPSET**") was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act ("**RMA**") duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid. The NPSET only applies to the National Grid – the assets used or owned by Transpower – and not to electricity generation or distribution networks. A copy of the NPSET is attached as **Appendix B**.

The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, councils have to work through how to make appropriate provision for the National Grid in their district/city plans, in order to give effect to the NPSET.

The one objective of the NPSET is as follows:

> *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.*

The NPSET's 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policy 1 of the NPSET provides that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy, development and use of new electricity generation, and enhanced supply.

Policies 2 to 9 provide RMA decision-makers direction for managing the environmental effects of transmission activities.

Recognition of the development of the National Grid is also required in Policy 2 of the NPSET. Policy 2 is as follows:

> *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.*

Policies 3 to 5 contain matters to which decision-makers must consider or have regard, including:

- the constraints imposed on avoiding, remedying or mitigating adverse effects by the technical and operational requirements of the network;
- the role of the route, site and method selection process in avoiding, remedying or mitigating adverse effects for new or major upgrades of transmission infrastructure; and
- the enablement of the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

Policies 6 to 8 relate to Transpower's responsibilities under the NPSET, with Policy 6 promoting the reduction of existing adverse effects where substantial upgrades of transmission infrastructure are undertaken. Policies 7 and 8 relate to circumstances in which the effects of transmission infrastructure could be reduced, minimised or avoided in urban and rural environments.

Policy 8 of the NPSET directs that within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain identified environments/areas (being outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity, and existing sensitive activities). The wording of NPSET Policy 8 ("should seek to avoid") does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET).

Policy 8 is as follows:

> *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 specifically relates to standards for dealing with electric and magnetic fields.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District Plan to address. Policy 10 is as follows:

> *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 relates to the development of buffer corridors, and is as follows:

> *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).*

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Policies 13 and 14 relate to the long-term strategic planning for transmission assets. Under 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.

Section 75(3)(a) of the RMA requires that district plans must 'give effect' to a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

It is therefore a requirement that local policy reflects national direction and that the local policy is effective in helping support the integrated management of natural and physical resources across the region as a whole.

Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("**NESETA"**) came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010: it does not apply to substations or electricity distribution lines, and nor does it apply to the construction of new transmission lines (which are typically designated).

Activities covered by the NESETA are activities relating to the operation, maintenance, upgrading, relocation or removal of an existing transmission line, including:

- a construction activity;
- use of land or occupation of the coastal marine area;
- activities relating to an access track to an existing transmission line; and
- undergrounding an existing transmission line.

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The NESETA regulates how Transpower's existing lines in the district are developed and maintained, rather than the District Plan rules. In accordance with Section 43B of the RMA, the District Plan rules cannot be more lenient or stringent than the NESETA rules and therefore the NESETA rules in effect prevail.

Waikato Regional Policy Statement

The Waikato Regional Policy Statement: Te Tauākī Kaupapahere ā-Rohe O Waikato ("**RPS**") was made operative in 2016. Section 75(3)(c) of the RMA requires that a District Plan must give effect to any Regional Policy Statement. Relevant provisions from the RPS are attached as **Appendix C**, with brief commentary on these provisions provided in the following paragraphs.

Energy, and specifically electricity transmission, is addressed within Objective 3.5. This objective provides for the operation, maintenance, upgrade and development of transmission that recognises and provides for the national significance and benefits, constraints, and the future needs and security of supply, of electricity transmission.

Objective 3.12 provides for development of the built environment in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes. Reference is made within the objective to protecting natural character and outstanding landscapes from inappropriate activities; ensuring development does not compromise infrastructure corridors; recognising and protecting the value and long-term benefits of regionally significant infrastructure; minimising land use conflicts, including minimising potential for reverse sensitivity; and providing for

the development, operation, maintenance and upgrading of new and existing electricity transmission.

Policy 6.3 further expands on the relationship of the built environment with infrastructure by directing that new development maintains the operational effectiveness, viability and safety of existing and planned infrastructure, and that investment in existing infrastructure is protected. Clause c) requires that the efficient and effective functioning of infrastructure is maintained, as well as the ability to maintain and upgrade that infrastructure.

Policy 6.6 also relates to management of the built environment with a focus on regionally significant infrastructure. As with Policy 6.3, there is a clear policy directive to manage the built environment having particular regard to ensuring the effectiveness and efficiency of existing and planned regionally significant infrastructure is protected; the benefits of Regionally Significant Infrastructure ("**RSI**") and electricity transmission; and the technical and operational constraints of the electricity transmission network.

The provision of a "Transmission corridor management approach" is identified within Section 6.6.2 as a specific implementation method, with reference to the NPSET.

The above objectives and policies provide a clear policy directive to ensure the development of the built environment does not compromise the National Grid, and that electricity transmission is appropriately recognised and provided for.

Specific National Grid Policy Framework

The primary basis and reasoning for the National Grid specific provisions in the PDP is to recognise the national significance of the National Grid and enable its operation, maintenance, upgrade and development. The proposed policy framework in NU-P20 to P22 reflects Transpower's evolving approach to the management of activities near the National Grid over nearly 10 years, as it works with Councils around the country on various plan reviews and plan change processes to give effect to the NPSET.

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.

There are three broad aspects to the NPSET which must be given effect to in district plans, as below.

Enabling the National Grid:

Policies and plans must provide for the effective operation, maintenance, upgrading and development of the National Grid. This includes recognising the national benefits. Policy 1 specifies that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy and facilitating the use and development of new electricity generation, including renewable generation in the management of the effects of climate change.

In terms of its existing assets, Transpower undertakes a wide range of maintenance activities across its entire asset base. Typical maintenance activities include earthworks, vegetation trimming and clearance, and support structure maintenance activities. Some, but not all, of these activities are

regulated under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009. Transpower considers it necessary for the District Plan to adopt an enabling framework through which the benefits of the National Grid can be considered and recognised.

Managing the effects 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."*

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.

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.

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.

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:

- 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.

This policy direction within the NPSET sets an appropriate rule framework for National Grid infrastructure.

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.

Managing the effects on 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 Transpower 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:

- 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.

The most effective and efficient way of managing the potential for adverse effects on the National Grid is to adopt a corridor approach. Transpower's corridor approach has two components, often referred to as the "National Grid Yard" and the "National Grid Subdivision Corridor". Adopting the National Grid corridor approach is supported by NPSET Policy 10 and 11. Policy 10 requires that councils to the extent reasonably possible, manage activities to avoid reverse sensitivity effects on the electricity transmission network and ensure that the operation, maintenance, upgrading, and development of the electricity transmission network is not compromised. Policy 11 requires that councils identify an appropriate buffer corridor, within which sensitive activities should generally not be provided for.

Transpower's Submission on the Proposed Waitomo District Plan

Transpower largely supports the PDP, however seeks amendments as outlined in the table attached to this submission in order to give effect to the NPSET. The submission points can be summarised as follows:

Definitions

- The definitions are largely supported, with two additional definitions sought to assist in plan interpretation (being Reverse Sensitivity and Transmission Lines) and an amendment to the definition of Transmission sensitive activity(ies).

Strategic Outcomes/Objectives

- Transpower supports the Strategic Objectives (specifically Standards O16 and O30), however recommends an amendment to the introduction to clarify the relationship to other plan objectives.

Energy Chapter

- While Chapter 17 is not directly applicable to Transpower, it is of relevance given it relates to energy generation which will play a critical role in New Zealand's carbon zero commitment and mitigating the effects of climate change. Transpower is supportive of the policy approach to increase the security of energy supply, however has concerns with rules which provide a prohibitive or non-complying activity status.

National Electricity and Gas Transmission Chapter

- Chapter 18. National Electricity and Gas Transmission relates to activities undertaken by other parties within the National Grid Yard. Transpower is generally supportive of the Chapter, and in particular supports the location of the policies and rules within the one chapter. Such an approach provides clarity for plan users and provides a clear link between the policy and rule framework. Notwithstanding the support, some rule and policy amendments (including amendment to activity status) are sought to give effect to the NPSET.

Network Utilities Chapter

- Chapter 19 applies to network utility operators and includes provisions specific to the operation, maintenance, upgrading and development of network utilities. Transpower is supportive of the provision of specific National Grid policies within the Chapter on the basis such policies give effect to the NPSET.
- The PDP correctly defers to the NESETA for existing electricity transmission lines.
- The rules in the Chapter are largely supported. However, amendment is sought to Rule NE-R33 (earthworks) and R37 (indigenous vegetation) to provide a discretionary activity status as opposed to non-complying.

Subdivision Chapter

- Transpower supports the provision of a rule relating to subdivision within proximity of the National Grid. However, it submits the activity status and policy framework do not give effect to the NPSET. A new rule and policy are sought.

Coastal Environment Chapter and Natural Features and Landscapes Chapter

- While the National Grid is addressed within Chapter 18 National Electricity and Gas Transmission and Chapter 19 Network Utilities, it is noted Infrastructure is referenced within policies within the Coastal Environment (Chapter 32) and Natural Features and Landscapes (Chapter 28) chapters. Arguably the term 'Infrastructure' (as defined in the RMA) applies to the National Grid. While the rules within Chapter 32 Coastal Environment and Chapter 28 Natural Features and Landscapes do not apply to the National Grid, the application of the policies is unclear. Transpower would support clarification within the overview to clarify the application of the above chapters in relation to the National Grid.

Natural Character Chapter and Ecosystems and Indigenous Biodiversity Chapter

- The National Grid is addressed within Chapter 18 National Electricity and Gas Transmission and Chapter 19 Network Utilities, and while the rules within Chapter 26 Ecosystems and Indigenous Biodiversity and Chapter 27 Natural Character do not apply to the National Grid, the application of the policies is unclear. Transpower would support clarification within the overview to clarify the application of the above chapters in relation to the National Grid.

Specific Comments

In addition to the general commentary above (which for the avoidance of doubt, forms part of the Transpower submission in that it outlines additional reasoning for the specific relief sought in the following table), the following provides specific submissions points.

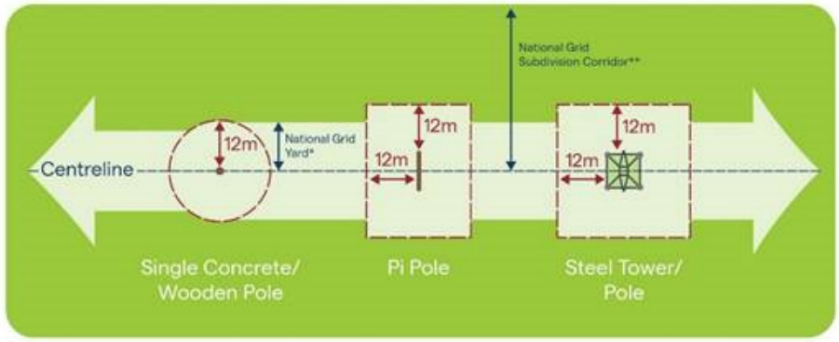
Amendments sought through this submission are shown as ~~red strikethrough~~ and underline text. For the avoidance of doubt all the points below include any consequential amendments.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
Part 1 – Introduction and General Provisions			
Interpretation			
9. Definitions			
earthworks *means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavating of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.*	Support	Transpower supports this definition as it reflects the National Planning Standards. Earthworks are an activity which can directly impact on the National Grid and Transpower supports the provision of a nationally consistent definition.	Retain the definition
functional need *means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.*	Support	The definition reflects that provided in the National Planning Standards and is therefore supported.	Retain the definition
land disturbance *means the alteration or disturbance of land (or any matter constituting the* *land including soil, clay, sand and rock) that does not permanently alter the profile, contour or height of the land.*	Support	The definition reflects that provided in the National Planning Standards and is therefore supported.	Retain the definition
maintenance (in relation to network utilities) *means, in relation to network utilities, any work or activity necessary to continue the operation and/or functioning of existing infrastructure. It includes the repair and/or replacement of an existing line, pipe, building, structure, road or other asset with another of the same or*	Support	Notwithstanding that the NESETA regulates maintenance associated with existing National Grid lines, the definition of maintenance is supported as it recognises	Retain the definition

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
similar height, size, and scale within the same or similar position and for the same purpose. For the avoidance of doubt maintenance excludes upgrading, and the word 'similar' means 'almost identical'.		activities associated with the ongoing operation of existing network utilities.	
minor upgrade (in relation to existing energy activities) *means the improvement or increase in carrying capacity, operational efficiency, security, or safety of an existing energy activity. This also includes structures and associated earthworks and site works where the effects of that activity remain the same or similar in character, intensity and scale*	Support	The definition of minor upgrading is supported as it recognises activities associated with the ongoing operation of existing energy activities. It is noted the NESETA regulates maintenance associated with existing National Grid lines.	Retain the definition.
National Grid *means the assets used or owned by Transpower NZ Limited.*	Support	The definition is supported on the basis it will assist with plan interpretation in providing clarity as to the assets forming part of the National Grid. Transpower's preference is the term be capitalised so that it is readily identified as a defined term in the PDP.	Retain the definition Capitalise the definition. National Grid
national grid subdivision corridor *means the area measured either side of the centreline of the above ground national grid line as follows:* *(g) 16m for the 110kV lines on pi poles.* *(h) 32m for the 110 kV lines on towers.* *(i) 37m for the 220 kV transmission lines.*	Support	Transpower is supportive of definitions for National Grid Subdivision Corridor (and National Grid Yard) 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. The 'National Grid Subdivision Corridor' width of up to 37m (maximum) is based on the distance from the centreline between the support structures to a point where the conductor would swing under various	Retain the definition of National Grid Subdivision Corridor and capitalise the definition and its use in the PDP. National Grid Subdivision Corridor

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		operating conditions, including high wind conditions, and is the swing of the 95th percentile span across the country. 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). 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 10ºC, 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 were 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	

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		the country and access requirements for maintenance purposes. 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. In essence the corridor is wider than the Yard and it should be noted that the corridor and yard overlap (that is, the National Grid Yard is wholly contained within the National Grid Subdivision Corridor).	
national grid yard *means the area located 12 metres in any direction from the outer edge of a national grid support structure (including where towers are replaced with tubular steel monopoles), and the area located 12 metres either side of the centreline of any overhead national grid line. The national grid yard does not apply to underground cables or any transmission lines (or sections of line) that are designated*	Support	Transpower is supportive of definitions for National Grid Yard (and National Grid Subdivision 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. The 'National Grid Yard' is a 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). The	Retain the definition of National Grid Yard, and capitalise the definition and its use in the PDP. National Grid Yard

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
 * National Grid Yard: 10m for single concrete/wooden pole lines, 12m for all other line types ** National Grid Subdivision Corridor: 14m, 32m, 37m or 39m depending on line voltage		width is in part determined by the support structure type. Within Waitomo District the majority of the transmission line support structures are towers. However there are two single poles and eight pi poles on the ARI-ONG A line in the north of the district. Given the very limited number of single poles in the district, a 12m setback from support structures as outlined in the proposed definition is supported. As a minor correction, Transpower's preference is for the use of capital letters when referencing the National Grid Yard.	
network utility operator *has the same meaning as in s166 of the RMA (as set out in the box below)* ……	Support	The definition reflects that provided in the RMA and is therefore supported. The provision of a definition is supported in that it provides clarity for plan users.	Retain the definition.
operational need *means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.*	Support	The definition reflects that provided in the National Planning Standards and is supported.	Retain the definition
regionally significant infrastructure *means:*	Support	The provision of a definition is supported in that it provides clarity for plan users.	Retain the definition. Use capitals for first letter;

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
(a) pipelines for the distribution or transmission of natural or manufactured gas or petroleum; *(b) infrastructure required to permit telecommunication as defined in the Telecommunications Act 2001;* *(c) radio apparatus as defined in section 2(1) of the Radio Communications Act 1989;* *(d) the national electricity grid, as defined by the Electricity Industry Act 2010;* *(e) a network (as defined in the Electricity Industry Act 2010);* *(f) infrastructure for the generation and/ or conveyance of electricity that is fed into the National Grid or a network (as defined in the Electricity Industry Act 2010);* *(g) significant transport corridors as defined in Map 6.1 and 6.1A of the Operative Waikato Regional Policy Statement;* *(h) lifeline utilities, as defined in the Civil Defence and Emergency Management Act 2002, and their associated essential infrastructure and services;* *(i) municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure;* *(j) flood and drainage infrastructure managed by Waikato Regional Council.*			Regionally Significant Infrastructure (RSI)
Transmission sensitive activity(ies) *means those activities that are particularly sensitive to national electricity and gas transmission activities, including but not limited to:*	Amend	Given the context in which the definition is used, the provision of a definition for Transmission sensitive activity is supported. However, clause (l) is not	Retain the definition of Transmission sensitive activity(ies), however amend

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
(a) residential units and minor residential units, boarding houses, cohousing developments, compact housing developments, retirement villages, visitor accommodation, papakāinga units papakāinga housing developments, residential based visitor accommodation, managed care facilities and other buildings used for residential activities. *(b) Camping grounds.* *(c) Tiny houses and tiny house developments.* *(d) Marae complex.* *(e) Community facilities including museums and libraries.* *(f) Educational facilities.* *(g) Hospitals and healthcare facilities.* *(h) Tourism facilities, outdoor education activities and recreational hunting.* *(i) Leisure and entertainment facilities, including shopping malls, indoor fitness centres, theatres and cinemas.* *(j) Prisons.* *(k) Any building storing hazardous substances, hazardous facilities, significant hazardous facilities and infrastructure (excluding those that are ancillary to national electricity and gas transmission activities); and* *(l) Other venues or areas where larger numbers of people are intermittent and in larger numbers than the general location or area.*		considered necessary and therefore could be deleted, as are *outdoor education activities and recreational hunting* within clause (h). For the avoidance of doubt, an amendment is sought to clause (f) to specifically reference childcare facilities.	clause (f) and (h); and delate clause (l) as follows: *(f) Educational (including childcare) facilities.* *(h) Tourism facilities~~, outdoor education activities and recreational hunting~~.* *(l) ~~Other venues or areas where larger numbers of people are intermittent and in larger numbers than the general location or area.~~*
New definition - Reverse Sensitivity	Amend	On the basis the term is used within the National Electricity and Gas Transmission Chapter 18, the provision of a definition is sought to assist with plan interpretation.	Insert a definition as follows: *means the potential for an approved, existing or permitted activity to be*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		The concept recognises the relationship between existing activities and incompatible new or altered activities.	*compromised or constrained, by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by the approved, existing or permitted activity.*
New Definition – Transmission line	Amend	The term 'transmission line' is used across the plan in multiple policies and matters of discretion and rules. Given the importance of the term, the provision of a definition would assist with plan interpretation.	Insert a definition as follows: ***Transmission line:*** *has the same meaning as provided in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009*
National Direction Instruments			
12. National policy statement and New Zealand Coastal Policy Statement			
National Policy Statement on Electricity Transmission 2008 *The policy statement has been reviewed in March 2022. Its provisions are given effect to across the plan but specifically within the following chapters: National Electricity and Gas Transmission, network utilities, energy.*	Support	Transpower supports reference to National Policy Statements, and specifically the inclusion of reference to the National Policy Statement for Electricity Transmission 2008. It is noted the reference to the March 2022 review gives effect to Chapter 6, Standard 17(c) of the National Planning Standards.	Retain the reference.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
13. National environmental standards			
National Environmental Standards *National Environmental Standards (NESs) are prepared by central government and can prescribe technical standards, methods (including rules) and/or other requirements for environmental matters throughout the whole country or specific areas. If an activity doesn't comply with an NES, it is likely to require a resource consent. NESs must be observed and enforced by local authorities.* *The following NESs are currently in force:* *…* ▪ *Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009*	Amend	Transpower supports reference to the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009, noting the NES prevails over the district plan provisions. The text could be improved by clarification as to the relationship between the NES and the district plan rules. The date of the NESETA also requires correction from 2016 to 2009.	Retain the reference to the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009, with amendment as outlined below: National Environmental Standards *National Environmental Standards (NESs) are prepared by central government and can prescribe technical standards, methods (including rules) and/or other requirements for environmental matters throughout the whole country or specific areas. If an activity doesn't comply with an NES, it is likely to require a resource consent. NESs must be observed and enforced by local authorities. The relationship between the NES and the district plan rules are prescribed in the NES itself and the RMA.* *The following NESs are currently in force:* *…* ▪ *Resource Management (National Environmental Standards for Electricity*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			Transmission Activities) Regulations ~~2016~~ 2009
Part 2 – District Wide Matters			
Strategic Direction			
16. Strategic direction, urban form and development			
Overview *The objectives in this chapter have the same status as all other objectives in the plan but provide strategic guidance across the district.*	Amend	Transpower does not support the comment that the strategic objectives have the same status as other objectives given the high-level nature of the strategic objectives and that not all issues are addressed at the strategic objective level.	Amend the introductory text as follows: ***Overview*** *The objectives in this chapter ~~have the same status as all other objectives in the plan but~~ provide strategic guidance across the district.*
SD-O16. *The district's communities work towards reduced reliance on non-renewable sources of energy, increased use of renewable energy sources and greater energy conservation.*	Support	Transpower supports the provision of a strategic objective specific to renewable energy and energy conservation.	Retain the Strategic Objective
SD-O30. *Recognise and provide for nationally and regionally significant infrastructure and industry, and for those activities associated with significant mineral resources.*	Support	Transpower supports the provision of a specific strategic objective that recognises and provides for infrastructure, and specifically that of national and regional significance.	Retain the Strategic Objective
Energy, Infrastructure and Transport			
17. Energy			

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
General Comment – Chapter 17. Energy, Infrastructure and Transport	Amend	While Chapter 17 is not directly applicable to Transpower, it is of relevance given it relates to energy generation which will play a critical role in New Zealand's carbon zero commitment and mitigating the effects of climate change. Transpower is supportive of the policy approach to increasing the security of energy supply but has concerns with rules which provide a prohibitive or non-complying activity status.	Amend Chapter 17 to appropriately recognise and provide for renewable generation activities in support of Strategic Direction SD-016.
18. National Electricity and Gas Transmission			
General Comment – Chapter 18. National Electricity and Gas Transmission	Support	Chapter 18. National Electricity and Gas Transmission relates to activities undertaken by other parties within the National Grid Yard. Transpower is generally supportive of the chapter, and in particular supports the location of the policies and rules within one chapter. Such an approach provides clarity for plan users and provides a clear link between the policy and rule framework. Transpower also supports the separate policy and rule framework for the National Grid transmission network given it is	Retain Chapter 18. *National Electricity and Gas Transmission* subject to the amendments outlined in subsequent submission points.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		recognised to be of national significance through the NPSET.	
Overview *Parts of the nationwide electricity and gas transmission network are located within Waitomo district. These networks perform a critical function and are integral to the effective and efficient operation of New Zealand's economy as well as making a vital contribution to community health and safety. The provisions of this chapter manage activities near these networks.* *How land is used within and adjacent to these corridors can significantly affect network operation, maintenance, and access. These networks can be sensitive to a range of actual and potential effects generated by adjacent activities. Conversely, locating some activities within close proximity to these corridors must be avoided to minimise risks to people's health and safety. There are three Sites or Areas of Significance to Māori and one site zoned Māori Purpose Zone that is on land within the identified corridors. Provisions have been added to this Chapter to ensure activities in these locations are not unintentionally restricted.* *The National Policy Statement on Electricity Transmission 2008 recognises the national significance of the electricity transmission system. It requires, to the extent possible, the management of adverse effects on the network from other activities. Although there is no national policy statement specific to the gas transmission network, this plan recognises these assets as having similar values, a similar linear extent and performing a similar function.* *Te Ture Whaimana o Te Awa o Waikato - Vision and Strategy for the Waikato River 2010 is a significant document for part of the district. Reference to the Strategic directions sections of this plan is required in*	Amend	Chapter 18. *National Electricity and Gas Transmission* relates to activities undertaken by other parties within the National Grid Yard. Transpower supports the overview text but does not support the exemption for Sites or Areas of Significance to Māori from the earthworks rules. The purpose of the National Grid Yard earthworks rules are to manage activities within proximity of the National Grid to ensure activities do not endanger people, property and/or National Grid assets. While Transpower appreciates and respects the cultural use and values of the site, the risk from earthworks remains regardless of the purpose of the activity or who it is undertaken by. It is also noted the provisions reflect the requirements of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), which are required to be complied with. Transpower seeks to work proactivity with the community when activities are proposed if resource consent is required.	Amend paragraph two of the overview text as follows: (refer red text) *How land is used within and adjacent to these corridors can significantly affect network operation, maintenance, and access. These networks can be sensitive to a range of actual and potential effects generated by adjacent activities. Conversely, locating some activities within close proximity to these corridors must be avoided to minimise risks to people's health and safety. There are three Sites or Areas of Significance to Māori and one site zoned Māori Purpose Zone that is on land within the identified gas transmission corridor~~s~~. Provisions have been added to this Chapter to ensure activities in these locations are not unintentionally restricted.*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
respect of this matter. Ko Tā Maniapoto Mahere Taiao Environmental Management Plan 2018 and Waikato-Tainui Environmental Management Plan 2013 also contain directions and outcomes to be achieved in respect of the provision of infrastructure. Applicants are directed to these documents when planning or undertaking works within the district. *Subdivision proximal to these networks is managed in the subdivision chapter. The provisions of the network utilities chapter manage the operation, maintenance, replacement, upgrading and development of these assets.*			
Objectives			
NEGT-01 *The national significance and benefits of the National Grid are recognised and provided for, and the National Grid is protected from other activities.*	Support	Transpower supports the objective. The reference to 'recognised and provided for' gives effect to Policy 1 of the NPSET. The requirement that the grid be protected from other activities gives effect to policies 10 and 11 of the NPSET, noting that more specific and directive wording that reflects the NPSET is provided within the associated policies NEGT-P1, P2 and P4.	Retain NEGT-01
Policies			
NEGT-P1 *Within the National Grid Yard avoid the establishment or expansion of transmission sensitive activities and buildings or structures used for these purposes in order to:* *1. Protect the national significance of the National Grid; and*	Support	Transpower supports the policy on the basis it gives effect to policies 10 and 11 of the NPSET.	Retain NEGT-P1

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
2. Avoid the potential for reserve sensitivity effects on the National Grid; and *3. Reduce exposure to health and safety risks; and* *4. Ensure the safe and efficient operation, maintenance, repair, upgrading and development of the National Grid is not compromised.*			
NEGT-P2 *Manage activities, buildings, structures and earthworks for any other activity within the National Grid Yard to:* 1. *Ensure the safe and efficient operation, maintenance, repair, upgrading or development of the National Grid is not compromised; and* 2. *Provide security of supply and/or integrity of National Grid assets; and* 3. *Maintain ongoing access to conductors and support structures for maintenance and upgrading works; and* 4. *Manage all activities to avoid exposure to health and safety risks from the National Grid; and* **5.** *Avoid potential for reverse sensitivity effects on the National Grid.*	Amend	Transpower supports the policy on the basis it gives effect to policies 10 and 11 of the NPSET. For completeness a minor amendment is sought to reference compliance with NZECP34:2001.	Retain Policy NEGT-P2 with a minor amendment to reference compliance with NZECP34:2001 as follows: (refer red text) *NEGT-P2* *Manage activities, buildings, structures and earthworks for any other activity within the National Grid Yard to:* **1.** *Ensure the safe and efficient operation, maintenance, repair, upgrading or development of the National Grid is not compromised; and* **2.** *Provide security of supply and/or integrity of National Grid assets; and* **3.** *Maintain ongoing access to conductors and support structures for maintenance and upgrading works; and* **4.** *Manage all activities to avoid exposure to health and safety*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			risks from the National Grid; and ***5.*** *Avoid potential for reverse sensitivity effects on the National Grid; and* ***6.*** *Achieve compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).*
NEGT-P6 *Manage the use of explosives in proximity to the gas transmission network and hazardous substances in proximity to the National Grid Yard, in order to avoid the potential for high-risk events which would impact people's health and safety, cause property damage and disruption to supply.*	Support	Transpower supports the policy on the basis it gives effect to policies 10 and 11 of the NPSET.	Retain Policy NEGT-P6
Rules			
The rules in NEGT - Table 1 apply within the National Grid Yard and within specified distances from the gas transmission pipelines and network. To undertake any activity, it must comply with all the rules listed in: • *NEGT - Table 1 - Activities Rules; and* • *Any relevant provision in Part 2 District-Wide Matters; and* • *Any relevant provision in Part 3 Area Specific Matters;*	Support	Transpower supports the clarification note.	Retain introductory text to the rules.
NEGT-R1. Earthworks, vertical holes or land disturbance within the National Grid Yard ***Activity status: PER***	Amend	Specific to earthworks, Transpower supports the provision of standards specific to earthworks on the basis such activities can compromise the National Grid and are	Amend Rule NEGT-R1 as follows:

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
Where: *1. Earthworks, vertical holes or land disturbance within the National Grid Yard must not:* *(i) Exceed 300 mm depth within 6m of the outer edge of the visible foundation of any National Grid support structure; and* *(ii) Exceed 3 m depth where located between 6m and 12 m of the outer edge of the visible foundation of any National Grid support structure; and* *(iii) Compromise the stability of any National Grid support structure; and* *(iv) Permanently physically impede existing vehicular access to any National Grid support structure; and* *(v) Result in a reduction of the existing ground to conductor clearances as required in Table 4 of the NZECP;* *AND* *2. NEGT-R1(i) and (ii) do not apply to the following earthworks, vertical holes or land disturbance:* *(i) Earthworks undertaken by a network utility operator (other than for the reticulation and storage of water for irrigation purposes). See the network utilities chapter for earthwork provisions; and* *(ii) Earthworks undertaken for cultivation or repair or sealing of a road, pedestrian accessways, walkways, cycleways, driveways or farm tracks; and* *(iii) Vertical holes not exceeding 500 mm in diameter that are located at least 1.5 m from the outer edge of a National Grid pole or stay wire, or are a post hole for a farm fence or*		a form of development contemplated by the NPSET. Specifically, earthworks restrictions are supported as earthworks have the potential to undermine transmission line structures, generate dust, and reduce the clearances between the ground and conductors. They also have the potential to restrict Transpower's ability to access the line and locate the heavy machinery required to maintain support structures around the lines and may lead to potential tower failure and significant constraints on the operation of the line. The default non-complying activity status reflects the non-compliance with NZECP 34:2001. A non-complying activity status is also considered the most effective means of giving effect to the NPSET's objective of managing the adverse effects of other activities on the network. In particular, a non-complying activity status: a. Most appropriately recognises and provides for the effective operation, maintenance, upgrading and development of the network, as required by NPSET Policy 2; b. Is the best method to manage other activities to ensure the operation, maintenance,	*NEGT-R1. Earthworks, vertical holes or land disturbance within the National Grid Yard* *Activity status: PER* *Where:* *1. Earthworks, vertical holes or land disturbance within the National Grid Yard must not:* ……. ~~*Nothing in this rule shall limit Māori cultural and customary uses and burials in sites or areas of significance to Māori or in the Māori purpose zones identified on the planning maps.*~~ *Activity status where compliance is not achieved: NC* *Note: This rule prevails over the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.* *Note: Transpower New Zealand Ltd will be considered an affected party in accordance with section 95E of the Act.*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
horticulture structure more than 6 m from the visible outer edge of a National Grid tower foundation; or *(iv) Earthworks subject to a dispensation from Transpower New Zealand Limited under the NZECP.* *Nothing in this rule shall limit Māori cultural and customary uses and burials in sites or areas of significance to Māori or in the Māori purpose zones identified on the planning maps.* ***Activity status where compliance is not achieved: NC*** ***Note: This rule prevails over the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.*** ***Note: Transpower New Zealand Ltd will be considered an affected party in accordance with section 95E of the Act.***		upgrading, and development of the network is not compromised, as required by Policy 10. The NPSET provides a strong direction that cannot be achieved by use of the restricted discretionary activity status. Such policy direction can only be achieved by way of a non-complying activity status. Notwithstanding the above support, Transpower seeks removal of the exemption clause at the end of the rule (relating to Sites or areas of significance to Māori. The purpose of the National Grid Yard earthworks rules are to manage activities within proximity of the National Grid to ensure activities do not endanger people, property and/or National Grid assets. While Transpower appreciates and respects the cultural use and values of the site, the risk from earthworks remains regardless of the purpose of the activity or who it is undertaken by. It is also noted the provisions reflect the requirements of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), which are required to be complied with. NZECP34:2001 manages earthworks in relation to safety and does not manage the adverse effects of earthworks on the grid.	

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		Transpower seeks to work proactivity with the parties when activities are proposed if resource consent is required.	
NEGT-R2. Buildings and Structures within the National Grid Yard ***Activity status: PER*** *Where:* *1. The following building and structures are permitted within the National Grid Yard:* *(i) Non-habitable buildings or structures for farming activities (excluding intensive indoor primary production, commercial greenhouses, milking sheds and buildings storing hazardous substances); and* *(ii) Ancillary stockyards and platforms, including those associated with milking sheds; and* *(iii) Artificial screens and fences no more than 2.5 m in height as measured from ground level, where these are located at least 5 m from the outer visible edge of any National Grid support structure; and* *(iv) Artificial crop protection structures or crop support structures not exceeding 2.5 m in height where located at least 8m from a National Grid transmission line pole that:* ***i.*** *Is removable or temporary to allow a clear working space of 12 m; and* ***ii.*** *Allows all weather access to the pole and a sufficient area for maintenance equipment including a crane; and* *(v) Where undertaken by a network utility operator, infrastructure (other than for the reticulation and storage of*	Amend	Transpower supports NEGT-R2 on the basis it gives effect to Policy 10 and Policy 11 of the NPSET. 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 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	Amend Rule NEGT-R2 ***NEGT-R2. Buildings structures within the National Grid Yard*** ***Activity status: PER*** ***Where:*** *1. The following building and structures are permitted within the National Grid Yard:* *(i) Non-habitable buildings or structures for farming activities (excluding intensive indoor primary production, commercial greenhouses, milking sheds and buildings storing hazardous substances); and* *(ii) Ancillary stockyards and platforms, including those associated with milking sheds; and* *(iii) Artificial screens and fences no more than 2.5 m in height as measured from ground level, where these*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
water for irrigation purposes) or any part of electricity infrastructure that connects to the National Grid. See the network utilities chapter; *AND* *2. All buildings and structures listed in NEGT-R2.1 must comply with the following:* *(i) Except for NEGT-R2.1 (iii), (iv) and (v), no building or structure must be located closer than 12 m from the outer visible foundation of any National Grid support structure); and* *(ii) No building or structure may permanently physically impede existing vehicular access to any National Grid support structure; and* *(iii) All buildings and structures must comply with the NZECP under all National Grid transmission line operating conditions.* *AND* *3. For the avoidance of doubt, any building or structure used for the handling or storage of Class 1-4 hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020 Regulations 2001) with explosive or flammable intrinsic properties is a non-complying activity, except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities.* ***Activity status where compliance is not achieved: NC*** ***Note: Transpower New Zealand Ltd will be considered an affected party in accordance with section 95E of the Act.*** ***Note: NZECP is mandatory under the Electricity Act 1992. All activities regulated by NZECP, including buildings, structures, earthworks and the operation of mobile plant, must comply with that regulation.***		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 significantly 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, specific to NEGT-R2, examples of development that should be avoided within the National Grid Yard include commercial buildings and intensive uses/development, dairy sheds, piggeries, poultry sheds, and commercial greenhouses. The location of buildings and	*are located at least 5 m from the outer visible edge of any National Grid support structure; and* *(iv) Artificial crop protection structures or crop support structures not exceeding 2.5 m in height where located at least 8m from a National Grid transmission line pole that:* ***i.*** *Is removable or temporary to allow a clear working space of 12 m; and* ***ii.*** *Allows all weather access to the pole and a sufficient area for maintenance equipment including a crane; and* *(v) Where undertaken by a network utility operator, infrastructure (other than for the reticulation and storage of water for irrigation purposes) or any part of electricity*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
Activities should be checked for compliance even if they are permitted by the Plan		activities 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. The only change sought to the rule is insertion of an explicit non-complying rule to make it clear that some activities are non-complying (noting that sensitive activities are managed under Rule NEGT-	*infrastructure that connects to the National Grid. See the network utilities chapter;* *AND* *2. All buildings and structures listed in NEGT-R2.1 must comply with the following:* *(i) Except for NEGT-R2.1 (iii), (iv) and (v), no building or structure must be located closer than 12 m from the outer visible foundation of any National Grid support structure); and* *(ii) No building or structure may permanently physically impede existing vehicular access to any National Grid support structure; and* *(iii) Buildings and structures must comply with the NZECP under all National Grid transmission line operating conditions.* ~~*AND*~~ ~~*3. For the avoidance of doubt, any building or structure used for the handling or storage of Class 1-4*~~

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		R3). Given the national significance of the National Grid, clear direction is required. The provision of a new non-complying rule allows for the relocation of clause 3. (which is proposed as a non-complying rule) to the explicit non complying rule.	~~*hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020 Regulations 2001) with explosive or flammable intrinsic properties is a non-complying activity, except this does not apply to the accessory use and storage of hazardous substances in domestic-scale quantities.*~~ ***3.*** ***Activity status: NC*** ~~***where compliance is not achieved: NC***~~ ***Where:*** *(i) Compliance with NEGT-R2.1 and NEGT-R2.2 is not achieved* *(ii) The building or structure within the National Grid Yard is used for the handling or storage of Class 1-4 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);* *(iii) The building or structure proposed within the National Grid Yard is a wintering barn,*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			commercial greenhouse, immovable protection canopu, produce packing facility or milking shed; *(iv) The proposal is for any building or structure not otherwise provided for.* *Note: Transpower New Zealand Ltd will be considered an affected party in accordance with section 95E of the Act.* *Note: NZECP is mandatory under the Electricity Act 1992. All activities regulated by NZECP, including buildings, structures, earthworks and the operation of mobile plant, must comply with that regulation. Activities should be checked for compliance even if they are permitted by the Plan*
NEGT-R3. New transmission sensitive activities including the erection or relocation of buildings for transmission sensitive activities ***Activity status: NC*** *Where:* *1. The following activities propose to locate within the* *National Grid Yard:*	Support	The rule is supported in that it ensures Policy 10 and Policy 11 of the NPSET are given effect to in terms of managing activities to avoid reverse sensitivity effects on the National Grid, ensure the operation, maintenance, upgrade and development of the National Grid is not compromised, and provide restrictions on sensitive activities.	Retain Rule NEGT-R3

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
(i) Establishment of a transmission sensitive activity in an existing or new building or structure; or *(ii) Construction of a new building or relocation of a building to accommodate a transmission sensitive activity; or* *(iii) Any change of land use to a transmission sensitive activity; or* *(iv) Additions or alterations to an existing building or structure for a sensitive activity that involves an increase in the building or structure height or footprint.* ***Activity status where compliance is not achieved: N/A*** ***Note: Transpower New Zealand Ltd will be considered an affected party in accordance with section 95E of the Act.*** ***Note: NZECP is mandatory under the Electricity Act 1992. All activities regulated by NZECP, including buildings, structures, earthworks and the operation of mobile plant, must comply with that regulation. Activities should be checked for compliance even if they are permitted by the Plan.*** ***Note: Vegetation to be planted around the National Grid should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.***		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 National Grid is not compromised.	

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
NEGT-R4. Quarrying activities *NEGT-R4. Quarrying activities* *Activity status: PR* *Where:* 1. *Within the National Grid Yard, the activity is a quarrying activity, farm quarrying or forestry quarrying.* *Note: This rule prevails over the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017* ***Activity status where compliance is not achieved: N/A***	Support	For the avoidance of doubt, Transpower supports the rule and activity status, although Transpower would not oppose a non-complying activity status.	Retain Rule NEGT-R4
19. Network Utilities			
Overview *This chapter applies to network utility operators and includes provisions specific to the operation, maintenance, upgrading and development of network utilities. Provisions relating to managing the effects on the national electricity grid and gas transmission network from other activities are contained in the national electricity and gas transmission chapter and also in the subdivision chapter.* *People and communities within the district rely on network utilities to undertake everyday activities. These include transport networks (land, sea and air), piped networks (water, wastewater, and stormwater reticulation), transmission and distribution networks (electricity and gas) and telecommunication networks (wired and wireless).* *In order to provide these services, utilities often rely on a national or regional network of assets. This plan recognises the importance of these networks and the benefits they provide. It also manages the potential*	Support	As noted, this chapter applies to network utility operators and includes provisions specific to the operation, maintenance, upgrading and development of network utilities. The effects of other activities on the National Grid are managed under the National Electricity and Gas Transmission Chapter 18. Transpower supports the overview to the chapter and the specific references to the National Grid and the NPSET. The NPSET is a higher order policy document that recognises and provides for the National Grid as being of national significance. Recognition within the overview ensures plan users are aware of the NPSET, and	Retain the Overview to Chapter 19. Network Utilities as it relates to the National Grid and the NPSET.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
for reverse sensitivity effects and the effects of activities which could potentially compromise the efficient and effective functioning of network utilities. Some utilities, such as the National Grid, have specific locational or operational needs that must be accommodated. For example, to maintain reliable cell phone coverage, telecommunication towers need to be placed in certain areas. The location and scale of new telecommunication towers in roads and in the general rural zone are provided for through the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF). The rules for new telecommunication towers outside of these locations and where the requirements of NESTF are not met, are controlled by this plan. The National Grid is a linear network that is recognised to be of national significance in the National Policy Statement on Electricity Transmission (NPSET). Existing National Grid assets are regulated by the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA). *While the national, regional and local benefits, of network utilities are recognised, adverse effects on surrounding land uses and the environment can occur and need to be managed. The district contains overlays, scheduled sites and features which include significant landscapes, karst landscapes, heritage buildings, sites and areas of significance to Māori and significant natural areas. Section 6 of the Act mandates that the values associated with these features are recognised and provided for. In respect of network utilities, this requires a balance so that the nature, location and scale of the utility is appropriate and respects the character, attributes and value outcomes anticipated for the receiving environment. In some cases, these effects are managed through National Environmental Standards, and in others, through the rules in this plan. The National Grid is recognised to be of national*		that the overview reflects the policy framework for the National Grid.	

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
significance in the NPSET and the district plan must give effect to the NPSET. *Other relevant regulations* *Additional regulatory requirements and approvals separate to this plan, are also relevant to network utilities, including:* *1. The requirements of the NESETA and the NESTF.* *2. Where relevant, the requirements of the National Code of Practice for Utility Operators' Access to Transport Corridors will apply to the placement, maintenance, upgrading and removal of network utility structures in the road.* *3. Compliance with the NZECP 34:2001 New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP) is mandatory under the Electricity Act 1992. All activities regulated by the NZECP, including any activities that are otherwise permitted by the plan, must comply with this regulation.* *4. Compliance with the Electricity (Hazards from Trees) Regulations 2003 is mandatory. All activities regulated by these regulations, including any activities that are otherwise permitted by the plan, must comply with this regulation.* *5. Connections to a network utility require approval of the relevant network utility operator and works within roads require approval of the relevant road controlling authority.*			
Objectives			
NU-01. *Effective, resilient, efficient and safe network utilities that:*	Support	Transpower supports the objective, noting that a specific policy framework for the National Grid is provided in policies NU-	Retain the objective NU-O1

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
1. *Provide essential and secure services, including in emergencies; and* 2. *Facilitate local, regional, national, or international connectivity; and* 3. *Contribute to the economy; and* 4. *Integrate with development, infrastructure and other activities; and* 5. *Enable people and communities to provide for their health, safety and wellbeing*		P20 – P22, and a specific National Grid objective is provided as NU-O3.	
NU-02 *The adverse effects of network utilities on the environment are avoided, remedied or mitigated whilst recognising the positive effects and functional and operational needs of network utilities.*	Support	Transpower supports the objective, noting that a specific policy framework is provided for the National Grid (refer NU-P20 – P22).	Retain the objective NU-O2
NU-03. *The national significance and benefits of the National Grid and gas transmission network are recognised and provided for.*	Amend	Transpower supports the objective, noting its preference that the National Grid is addressed in a separate objective.	Retain the intent of the objective but separate the National Grid into its own specific objective as follows: *NU-03.* *The national significance and benefits of the National Grid ~~and gas transmission~~ network are recognised and provided for.* *NU-03a.* *The national significance and benefits of the ~~National Grid and~~ gas transmission*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			network are recognised and provided for.
Policies – Benefits			
NU-P1 *Recognise the benefits of network utilities by allowing for the development, upgrade, operation, maintenance, repair or removal of network utilities and provide for the functions and responsibilities of network utilities including during an emergency.*	Support	Although not specific to the National Grid, Transpower supports the policy which requires the recognition of benefits. Such benefits are provided for by allowing for their development, upgrade, operation, maintenance, repair or removal. The policy gives effect to NPSET policy 1 and policy 2 and reflects the PDP strategic direction SD-O30.	Retain Policy NU-P1
NU-P2 *Recognise that the positive benefits of network utilities may be realised at a national, regional and local level. The benefits include an:* *1. Effective, safe, secure, and efficient electricity and gas transmission and distribution system; and* *2. Integrated, efficient, and safe transport network for the movement of people and goods by land, air, or water, including public transport, walking, cycling and private vehicles; and* *3. Effective, reliable and future-proofed communications network and services; and* *4. Effective, resilient, efficient and safe water, wastewater and stormwater treatment systems, network and services.*	Support	Transpower supports the policy (and in particular clause 1.) which requires the recognition of benefits. The policy gives effect to NPSET policy 1 and reflects the PDP strategic direction SD-O30.	Retain Policy NU-P2
Policies – Earthworks			

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
NU-P7. *Enable earthworks where they maintain the stability of land, are setback from caves, sinkholes and water bodies and minimise:* 1. *Erosion and sediment loss from the site, including loss to reticulated stormwater systems; and* 2. *The effect of cut or fill faces and retaining structures on the visual amenity and character of the surrounding area; and* 3. *Significant alterations to natural landforms; and* 4. *Adverse effects on air quality from objectionable particulate matter.*	Support	On the basis of the provision of specific National Grid policies (NU-P20-22) Transpower supports the policy.	On the basis of the provision of specific National Grid policies (NU-P20-22), retain Policy NU-P7.
Policies – Indigenous Biodiversity			
NU-P8. *Enable clearance of indigenous vegetation outside of overlays, scheduled sites and features, cave entrances and sinkholes, coastal and water body margins.*	Support	On the basis of the provision of specific National Grid policies (NU-P20-22) Transpower supports the policy.	On the basis of the provision of specific National Grid policies (NU-P20-22), retain Policy NU-P8
Policies – Adverse Effects			
NU-P9 *For roads in all locations and all land located outside of overlays, scheduled sites and features, manage the adverse effects of network utilities whilst taking into account their functional and operational needs, by:* 1. *Controlling the height, bulk and location of network utilities in a manner that minimises any adverse effects on the anticipated outcomes for the receiving environment including the role, function, character and identified qualities of the zone or precinct; and*	Amend	On the basis of the provision of specific National Grid policies (NU-P20-22) Transpower is largely neutral on the policy. However, the policy could be applied to the upgrade or development of the National Grid outside specified areas identified within policies NU-P21 and P22. On this basis, in the absence of a definition of minimise within the PDP, Transpower seeks an amendment to clause 1. to clarify	Amend Policy NU-P9 as follows: ***NU-P9*** *For roads in all locations and all land located outside of overlays, scheduled sites and features, manage the adverse effects of network utilities whilst taking into account their functional and operational needs, by:*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
2. *Requiring compliance with recognised standards or guidelines relating to radiofrequency fields and electric and magnetic fields; and* 3. *Requiring undergrounding of new electricity and telecommunications lines in the Te Kūiti CBD Precinct (PREC5) and the future urban zone only; however, this does not apply to upgrading of existing overhead lines.*		that the minimisation of adverse effects is minimise to the 'smallest amount reasonably practicable'. Clause 3. would be unlikely to apply to the National Grid given the location of existing assets and PDP identified future urban zones.	1. *Controlling the height, bulk and location of network utilities in a manner that minimises to the smallest amount reasonably practicable any adverse effects on the anticipated outcomes for the receiving environment including the role, function, character and identified qualities of the zone or precinct; and* 2. …..
NU-P10. *Ensure the location, scale and operation of network utilities and their ancillary activities avoid, remedy or mitigate adverse effects on nearby sensitive activities as far as practicable by:* 1. *Maintaining required separation distances to ensure reverse sensitivity effects are minimised; and* 2. *Ensuring sites are sufficiently landscaped and screened; and* 3. *Ensuring that industrial buildings are designed as far as practicable to not overshadow or overly dominate the wider surrounding area.*	Amend	While Transpower understands the intent of the policy directive, it is not clear how the policy would be applied to existing network utilities. When applied to the National Grid, Transpower has concerns the application of clause 2. could require landscaping around support structures. Such a requirement poses technical and operational issues for Transpower in that vegetation can pose a significant risk to the assets both in terms of a fire danger and operational issues While Transpower accepts the policy uses the term 'where practicable' this does impose a high bar in	Amend Policy NU-P10 as follows: ***NU-P10.*** *Ensure the location, scale and operation of new network utilities and their ancillary activities avoid, remedy or mitigate adverse effects on nearby sensitive activities as far as reasonably practicable by:* 1. *Maintaining required separation distances to ensure reverse sensitivity effects are minimised; and* 2. *Ensuring sites are sufficiently landscaped and screened; and*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		terms of demonstrating why landscaping is not appropriate.	3. *Ensuring that industrial buildings are designed as far as practicable to not overshadow or overly dominate the wider surrounding area.*
Policies – Hazards, overlays, scheduled sites and features			
NU-P11. *Ensure consideration of the values, qualities and characteristics of overlays, scheduled sites and features when proposing new infrastructure or undertaking significant upgrades to existing infrastructure.*	Support	Notwithstanding the provision of specific National Grid policies (NU-P20-22) Transpower supports the 'consideration' directive within the policy.	On the basis of the provision of specific National Grid policies (NU-P20-22), retain Policy NU-P11.
NU-P12. *Provide for regionally significant infrastructure within overlays, scheduled sites and features where:* 1. *There is a demonstrated functional or operational need for the infrastructure to be located within the overlay, scheduled site or feature; and* 2. *It is demonstrated through an options assessment that locating within the overlay, scheduled site or feature is the best practicable option, having particular regard to the financial implications, social, cultural and environmental effects of the preferred option, compared to alternative options.*	Support	Notwithstanding the provision of specific National Grid policies (NU-P20-22) Transpower supports the policy.	Retain Policy NU-P12.
Policies – Integration			

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
NU-P13 *In assessing the effects of any application and the directions contained in Policy NU-P1 to Policy NU-P12, have regard to:* 1. *The extent to which adverse effects have been addressed through site, route or method selection and/or the extent to which the network utility is constrained by functional or operational needs; and* 2. *Whether, because of functional and operational constraints, there may be some situations where all adverse effects cannot be avoided, remedied, or mitigated; and* 3. *The necessity and significance of the network utility, including:* *(i) The need to quickly repair and restore disrupted services; and* *(ii) The impact at a local, regional and national level of not operating, repairing, maintaining, upgrading, removing or developing the network utility; and* 4. *The time, duration or frequency of adverse effects; and* 5. *The location of existing network utilities, including:* *(i) The complexity and connectedness of the networks and services; and* *(ii) The potential for co-location and shared use of network utility corridors.*	Support	Notwithstanding the provision of specific National Grid policies (NU-P20-22) Transpower supports the policy.	Retain Policy NU-P13.
NU-P14 *Support network utilities in adopting new technologies that:*	Support	Transpower supports the policy which recognises new technologies.	Retain policy NU-P14.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
1. *Improve access to, and efficient use of, networks and services; and* 2. *Allow for the re-use of redundant services and structures; and* 3. *Enable co-location on existing structures; and* 4. *Increase resilience, safety or reliability of networks and services; and* 5. *Result in environmental benefits and enhancements; or* 6. *Promote environmentally sustainable outcomes including green infrastructure and the increased utilisation of renewable resources*			
NU-P19 *The function, operation, maintenance, repair and upgrading of existing network utilities is protected from the adverse effects, including reverse sensitivity effects, of subdivision, use and development.*	Support	Although the effects of third-party activities on the National Grid are addressed within the National electricity and gas transmission Chapter 18 (and specifically policies NEGT-P1, P2 and P6), Transpower supports the policy.	Retain policy NU-P19.
Policies – National Grid			
NU-P20 *Enable the operation, maintenance and minor upgrade and repair of the National Grid.*	Amend	Transpower seeks a suite of provisions specific to the National Grid. Policies 2 to 9 of the NPSET are particularly relevant to the proposed district plan 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.	Amend Policy NU-P20. *NU-P20* *Enable the operation, maintenance and minor upgrade and repair of the National Grid.* *In the event of any conflict with any other policies within the plan, NUP20, NU-P21 and NU-P22 take precedence.*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		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 proposed policy framework provides a bespoke National Grid specific framework that would give effect to the NPSET and NU-O3. It is noted the policy framework for managing other activities (including earthworks and subdivision) are addressed in the Transmissions Chapter 18 and Subdivision Chapter 29. Transpower is comfortable with the plan placement of provisions relating to the effect of third-party activities on the Grid. The provisions of specific policies for the National Grid is consistent with the approach sought and adopted across other district (and regional) plans across the country. Specific to policy NU-P20, Transpower supports the provision of specific policy direction in relation to enabling existing National Grid assets. The policy gives effect to Policy 2 and Policy 5 of the NPSET.	

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		Notwithstanding the above support, an amendment is sought to include clause 6 within Policy NU-P22 to clarify the relationship between other policies of the plan and the National Grid specific policies (noting that clause 6 provides specific reference to policy NU-P20 and therefore it is assumed the intention is that it be applied to NU-P20).	
NU-P21 *Provide for the upgrading of the National Grid by:* ***1.*** *Seeking to avoid adverse effects on areas identified in SCHED1 - heritage buildings and structures, SCHED2 – significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori, SCHED6 - significant natural areas, and SCHED8 - outstanding natural features; and* ***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; and* ***3.*** *Recognising 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* ***4.*** *Recognising the potential benefits of upgrades to the National Grid to people and communities; and* ***5.*** *Where appropriate, substantial upgrades should be used as an opportunity to reduce existing effects of the National Grid.*	Amend	For the reasons provided on the submission point relating to NU-P20, Transpower supports the provision of a specific policy relating to upgrading (that is not a minor upgrade) to the National Grid. Policy NU-P21 gives effect to policies 2, 3, 4, 6, 7 and 8 of the NPSET. The policy imposes a 'seek to avoid' approach for sensitive environments within the vicinity of existing National Grid assets but having regard to the constraints, benefits and route, site and method selection process. The policy recognises the existing nature of the assets and therefore avoidance is not always possible. It is noted there are no existing National Grid assets within the coastal environment within the Waitomo District, and the existing lines do not traverse or are not adjacent to any PDP SCHED 5, 7, 9, 10, 11, 12 and 13 sites. As	Amend Policy NU-P2 as follows: *NU-P21* *Provide for the upgrading of the National Grid by:* *1. Seeking to avoid adverse effects on areas identified in SCHED1 - heritage buildings and structures, SCHED2 – significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori, SCHED6 - significant natural areas, and SCHED8 - outstanding natural features; and* *2. When considering major upgrades, have regard to the extent to which adverse effects have been avoided,*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		such the schedules are not referenced in the policy as there would not be any upgrade in these scheduled areas. Notwithstanding the above support, an amendment is sought to include clause 6 within Policy NU-P22 to clarify the relationship between other policies of the plan and the National Grid specific policies (noting that clause 6 provides specific reference to policy NU-P21).	*remedied or mitigated by the route, site and method selection; and* *3. Recognising 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* *4. Recognising the potential benefits of upgrades to the National Grid to people and communities; and* *5. Where appropriate, substantial upgrades should be used as an opportunity to reduce existing effects of the National Grid.* *6. In the event of any conflict with any other policies within the plan, NUP20, NU-P21 and NU-P22 take precedence.*
NU-P22 *Provide for the development of the National Grid:* ***1.*** *In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse*	Amend	For the reasons provided on the submission point relating to NU-P20 and NU-P21, Transpower supports the provision of a specific policy relating to development of the National Grid.	Amend Policy NU-P22 as follows: ***NU-P22*** *Provide for the development of the National Grid:*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
effects on the commercial zone, areas of high recreational or amenity value and existing sensitive activities; and ***2.*** *Seek to avoid the adverse effects of the National Grid within overlays, scheduled sites and features; and* ***3.*** *Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:* ***(i)*** *Seeking to avoid adverse effects on areas identified in SCHED6 - significant natural areas, SCHED7 – outstanding natural landscapes, SCHED8 - outstanding natural features, and SCHED10 – areas of outstanding natural character; and* ***(ii)*** *Where it is not practicable to avoid adverse effects on the values of the areas in identified in SCHED6 – significant natural areas, SCHED7 - outstanding natural landscapes, SCHED8 - outstanding natural features, and SCHED10 – areas of outstanding natural character because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values; and* ***(iii)*** *Seeking to avoid significant adverse effects on:* *i. SCHED11 – areas of high/very high natural character, SCHED9 – landscapes of high amenity value and SCHED12 – karst overlay; and* *ii. SCHED1 - heritage buildings and structures, SCHED2 - significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori; and*		Policy NU-P22 relates to the development of the National Grid and reflects Policy NU-P21 but with specific policy direction (within clause 3) to avoid significant adverse effects on NZPCS policy 11(b) (indigenous biodiversity), 13(b)(natural character) and 15(b) features (natural features and landscapes). This policy approach for the National Grid within the Coastal Environment reflets that agreed through consent order in the Greater Wellington Regional Council Proposed Natural Resources Plan (Policy 13A), and seeks to reconcile the NPSET and NZCPS. 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 that 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	1. *In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the commercial zone, areas of high recreational or amenity value and existing sensitive activities; and* 2. *Seek to avoid the adverse effects of the National Grid within overlays, scheduled sites and features; and* 3. *Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:* *(i) Seeking to avoid adverse effects on areas identified in SCHED6 - significant natural areas, SCHED7 – outstanding natural landscapes, SCHED8 - outstanding natural features, and SCHED10 – areas of outstanding natural character; and* *(ii) Where it is not practicable to avoid adverse effects on*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
iii. indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010; and *iv. Avoiding, remedying or mitigating other adverse effects to the extent practicable; and* ***4.*** *When considering the adverse effects in respect of NU-P22.1 - NU-P22.3 above;* ***(i)*** *Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and* ***(ii)*** *Consider the constraints arising from the operational needs and or functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.* ***5.*** *Other than policies relating to the coastal environment, in the event of any conflict with any other policies within the plan, NUP20, NU-P21 and NU-P22 take precedence.*		National Grid should 'seek to avoid adverse effects. 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. 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 proposed wording of in NU-P22 enables a case-by case merits assessment of specific National Grid projects in the coastal environment, through the resource consent process. 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	*the values of the areas in identified in SCHED6 – significant natural areas, SCHED7 - outstanding natural landscapes, SCHED8 - outstanding natural features, and SCHED10 – areas of outstanding natural character because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values; and* *(iii) Seeking to avoid significant adverse effects on:* *~~i. SCHED11 – areas of high/very high natural character, SCHED9 – landscapes of high amenity value and SCHED12 – karst overlay;~~ other areas of natural character in the coastal environment ~~and~~* *ii. ~~SCHED1 - heritage buildings and structures, SCHED2 - significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori;~~ natural attributes*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		of the network, and requires regard be had to the extent to which any adverse effects have been avoided, remedied or mitigated by the route site and robust and comprehensive process that is undertaken by Transpower in relation to the development of the National Grid. Notwithstanding the above support for NU-P22, Transpower seeks amendment to the policy as follows: – Amendment to clause 3.(iii) i. and ii. as clause (iii) is only meant to capture significant adverse effects to give effect to NZPCS policy 11(b) (indigenous biodiversity), 13(b)(natural character) and 15(b) features (natural features and landscapes), noting the clause only relates to the coastal environment. The features within schedules 1, 2, 3, 4, 9,11 and 12 are managed within clause 2. "*Seek to avoid the adverse effects of the National Grid within overlays, scheduled sites and features; and*" and therefore they are not required to be repeated in the coastal environment specific clause 3. which addresses the NZCPS.	*and characteristics of other natural features and landscapes in the coastal environment* *iii. indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010; and* ~~*iv. Avoiding, remedying or mitigating other adverse effects to the extent practicable; and*~~ *4. Remedying or mitigating other adverse effects to the extent practicable; and* *5. When considering the adverse effects in respect of NU-P22.1 - NU-P22.3 above;* *(i) Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and* *(ii) Consider the constraints arising from the operational needs and or functional needs of the National Grid, when considering measures*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		– Renumbering and rewording (in the form of deletion of the word 'avoiding') of clause 3.(iii).iv. to make it is own clause, so that it addresses effects that are not avoided within clauses 1-3. – Amendment to clause 6 to remove the reference to the coastal environment chapter. The NZECP and NPSET are reconciled through Policy NU-P22 (noting there are no existing National Grid assets in the coastal environment). The requirement to refer to the coastal environment policies does not recognise NU-P22 and will result in a confusing and potentially contradictory policy framework in which to assess the development of the National Grid.	*to avoid, remedy or mitigate any adverse effects.* 6. ~~*Other than policies relating to the coastal environment,*~~ *In the event of any conflict with any other policies within the plan, NUP20, NU-P21 and NU-P22 take precedence.*
Rules *The rules in this chapter apply to network utility operators only. The rules are contained in the tables listed below. To undertake any activity, it must comply with all the rules listed in:* • *NU - Table 1 - Activities Rules; and* • *NU - Table 2 - Performance Standards; and* • *Unless specifically referenced in a rule, Part 2 District-Wide Matters do not apply except for the following chapters:*	Support	Transpower supports the rules overview text as it assists with plan interpretation and application.	Retain the introductory text to the rules.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
Strategic direction, urban form and development, contaminated land, hazardous substances, financial contributions, hapori whānui, activities on the surface of water, relocated buildings and temporary activities; and • *Unless specifically referenced in a rule, Part 3 Area Specific Matters do not apply.*			
Rules ***NU-R1National Grid existing electricity transmission lines*** ***NU-R4 New and extended or upgraded access tracks*** ***NU-R19 New overhead lines and associated poles or towers*** ***NU-R20 New substations, ground mounted transformers, compressor/scraper stations, gas regulation valves and/or take off stations and ancillary energy storage batteries*** ***NU-R30 New network utilities not otherwise provided for in Table 1*** ***NU-R33 Earthworks*** ***NU-R37 Removal of indigenous vegetation*** ***NU-R38 New buildings adjacent to the open coast*** ***NU-R39 Buildings adjacent to Kawhia harbour or adjacent to a river in the coastal marine area*** ***NU-R40 Buildings and structures adjacent to a water body***	Support and amend	NU-R1 – the rule is supported as it correctly defers to the NESETA for existing electricity transmission lines. NU-R4 - while not directly applicable to the National Grid given the NESETA, Transpower supports the rule as it recognises the access requirements of network utilities. NU-R19 – Transpower supports the activity status for new overhead lines and towers and poles. It is noted these terms (lines, towers and poles) and the provision of definitions may be helpful to assist with plan interpretation. NU-R20 – Transpower supports the activity status for new substations. NU-R30 – While Transpower is not opposed to R30 (Network utilities not otherwise provided for), it is not clear what activities the rule would capture. Should the rule capture any National Grid activities, Transpower seeks amendment of	- Retain NU-R1 - Retain NU-R4 - Retain NU-R19 - Retain NU-R20 - Clarify the activities anticipated to be subject to NU-R30, and amend the activity status to discretionary should it apply to any National Grid activities. Alternately, Transpower seeks the rule clearly state it does not apply to the National Grid. - NU-R33 – amend the activity status for the National Grid to make earthworks associated with the National Grid no worse than discretionary. - NU-R37 – amend the activity status for the National Grid to make removal of indigenous vegetation associated with the National Grid no worse than discretionary. - Retain NU-R38

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		the activity status to discretionary, or the National Grid be excluded from the rule. NU-R33 – Given the national significance of the National Grid and the NPSET, Transpower opposes the non-complying activity status for earthworks, and instead seeks an activity no more onerous than discretionary, thereby reflecting the 'seek to avoid' policy approach sought for the National Grid. NU-R37 - Given the national significance of the National Grid and the NPSET, Transpower opposes the non-complying activity status for removal of indigenous vegetation within areas of Outstanding Natural Character, and instead seeks an activity no more onerous than discretionary, thereby reflecting the 'seek to avoid' policy approach sought for the National Grid. It is noted the rule applies to all indigenous vegetation and not only that identified within an SNA, and for areas of ONC, a non complying activity is triggered regardless of the area or extent of clearance. NU-R38 – The rule and activity status for buildings adjacent to the open coast is supported.	- Retain NU-R39 - Retain NU-R40

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		NU-R39 - The rule and activity status for buildings adjacent to the Kawhia Harbour or adjacent to a river in the CMA is supported. NU-R40 - The rule and activity status for buildings and structures adjacent to a water body is supported.	
Hazards and Risks			
22. Hazardous substances			
HS-R2. New significant hazardous facilities ***General rural zone, industrial and rural Production zones and Aerodrome precinct (PREC3)*** ***Activity Status: DIS*** *Where:* *1. The new significant hazardous facility is not located in a hazard area or a coastal hazard area; and* *2. The new significant hazardous facility is not located within the National Grid Yard or within 60 m of the gas transmission network; and* *3. The new significant hazardous facility must be setback at least 50 m from the edge of any water body as measured from the bankfull channel width (see HS – Figure 1).* ***Activity status where compliance is not achieved: NC*** *All other zones and precincts*	Support	Transpower supports the provision of a specific significant hazardous facility rule and non-complying activity status that applies to such activities within the National Grid Yard.	Retain rule HS-R2.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
Activity Status: NC ***Activity status where compliance is not achieved: N/A***			
Natural Environment Values			
26. Ecosystems and Indigenous Biodiversity			
General Comment on whole Chapter and **ECO-O1, O4, O5 and polices ECO-P1, P2, P3, P4, P5, P6, P11, and P13)**	Support /Amend	Chapter 26 contains no specific references to infrastructure or network utilities. Instead, Chapter 19 provides a specific rule and policy framework for network utilities with specific National Grid policies provided (NU-P20 – P22). Included in Chapter 19 are specific and general polices relating to indigenous biodiversity (including within SNA's). Specific to rules, the introduction to the rules in the Network Utilities Chapter 19 provides: *The rules in this chapter apply to network utility operators only. The rules are contained in the tables listed below. To undertake any activity, it must comply with all the rules listed in:* *NU - Table 1 - Activities Rules; and* *NU - Table 2 - Performance Standards; and* *Unless specifically referenced in a rule, Part 2 District-Wide Matters do not apply except*	On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 26 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid within Chapter 26 (and specifically objectives ECO-O1, O4, O5 and polices ECO-P1, P2, P3, P4, P5, P6, P11, and P13) to give effect to the NPSET.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		for the following chapters: Strategic direction, urban form and development, contaminated land, hazardous substances, financial contributions, hapori whānui, activities on the surface of water, relocated buildings and temporary activities; and *Unless specifically referenced in a rule, Part 3 Area Specific Matters do not apply.* Based on the above, and the specific provision of National Grid policies within Chapter 19 which have a seek to avoid approach to indigenous biodiversity and the precedence clause within NU-P22(6), the interpretation of the PDP is that Chapter 19 prevails. On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 26 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid within Chapter 26 (and specifically objectives ECO-O1, O4, O5 and polices ECO-P1, P2, P3, P4, P5, P6, P11, and P13) to give effect to the NPSET.	
27. Natural Character			
General Comment on whole Chapter and NATC-P1 and P2	Support/ Amend	Chapter 27 contains no specific references to infrastructure or network utilities.	On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		Chapter 19 provides a specific rule and policy framework for network utilities with specific National Grid policies provided (NU-P20 – P22). The introduction to the rules in the Network Utilities Chapter 19 provides: *The rules in this chapter apply to network utility operators only. The rules are contained in the tables listed below. To undertake any activity, it must comply with all the rules listed in:* *NU - Table 1 - Activities Rules; and* *NU - Table 2 - Performance Standards; and* *Unless specifically referenced in a rule, Part 2 District-Wide Matters do not apply except for the following chapters: Strategic direction, urban form and development, contaminated land, hazardous substances, financial contributions, hapori whānui, activities on the surface of water, relocated buildings and temporary activities; and* *Unless specifically referenced in a rule, Part 3 Area Specific Matters do not apply.* Based on the above, and the specific provision of National Grid policies within Chapter 19 which have a seek to avoid approach to PDP Schedule 10 and 11 sites,	27 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid (and specifically within policies NATC-P1, and P2) to give effect to the NPSET.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		and the precedence clause within NU-P22(6), the interpretation of the PDP is that Chapter 19 prevails. On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 27 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid (and specifically within policies NATC-P1, and P2) to give effect to the NPSET.	
28. Natural Features and Landscapes			
General Comment on whole Chapter and NFL-P1, P3 and P4	Amend	Chapter 19 provides a specific rule and policy framework for network utilities, with specific National Grid policies provided (NU-P20 – P22). The National Grid specific policies adopt a seek to avoid approach for PDP Schedule 7 and 9 features, noting that policy NU-P21 does not reference schedule 9 as there are no existing National Grid assets within PDP schedule 9 sites. The introduction to the rules in the Network Utilities Chapter 19 provides: *The rules in this chapter apply to network utility operators only. The rules are contained in the tables listed below. To*	On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 28 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid (and specifically within policies NFL-P1, P3, and P4) to give effect to the NPSET.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		undertake any activity, it must comply with all the rules listed in: *NU - Table 1 - Activities Rules; and* *NU - Table 2 - Performance Standards; and* *Unless specifically referenced in a rule, Part 2 District-Wide Matters do not apply except for the following chapters: Strategic direction, urban form and development, contaminated land, hazardous substances, financial contributions, hapori whānui, activities on the surface of water, relocated buildings and temporary activities; and* *Unless specifically referenced in a rule, Part 3 Area Specific Matters do not apply.* While the National Grid is addressed within Chapter 18 National Electricity and Gas Transmission and Chapter 19 Network Utilities, it is noted Infrastructure is referenced within NFL-P1.2 and NFL-P4.2. Arguably the term 'Infrastructure' applies to the National Grid. While the rules within Chapter 28 do not apply to the National Grid, the application of the policies is unclear. Based on the above, and the specific provision of National Grid policies within Chapter 19 which have a seek to avoid	

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		approach to PDP Schedule 7 and 9 sites, and the precedence clause within NU-P22(6), the interpretation of the PDP is that Chapter 19 prevails. On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 28 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid (and specifically within policies NFL-P1, P3, and P4) to give effect to the NPSET.	
Subdivision			
29. Subdivision			
Objectives			
SUB-010 *Subdivision is designed to avoid or mitigate any adverse effects on the operation, maintenance and access to established network utilities and regionally significant infrastructure.*	Support	While not specific to the National Grid, Transpower supports the objective to avoid or remedy adverse effects on established network utilities and regionally significant infrastructure.	Retain objective SUB-O10.
Policies			
SUB-P3 *Discourage subdivision that would:*	Support	On the basis of a National Grid specific policy (as sought in the submission point below on SUB-P31), Transpower supports Policy P3, particularly clause 8.	Retain Policy SUB-P3.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
1. *Compromise the function, safety or efficiency of the land transport network; and/or* 2. *Result in poorly designed, located or constructed vehicle access points; and/or* 3. *Fail to integrate with and acknowledge the constraints and opportunities of the site and surrounding area; and/or* 4. *Result in reverse sensitivity effects on adjacent sites, adjacent activities or the wider receiving environment; and/or* 5. *Result in reverse sensitivity effects which compromise the operation or expansion of regionally significant industries or regionally significant mineral resources; and/or* 6. *Allow the proliferation of residential rear allotments in the residential or settlement zones; and/or* 7. *Create allotment configurations for residential development which fail to maintain and enhance the character and amenity of the residential zone; and/or* 8. *Compromise the efficient provision of established network utilities and regionally significant infrastructure; and/or* 9. *Constrain the operation of established intensive indoor primary production activities; and/or* 10. *Increase the flow of stormwater runoff onto adjoining properties or flood plains, or reduce storage capacity on-site.*			
SUB-P31	Amend	The purpose of the subdivision provisions within the PDP are to manage subdivision in the National Grid Subdivision Corridor to ensure that the long-term maintenance,	Delete reference to the National Grid from SUB-P31 and create new policy as follows: (shown as red text)

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
Provide for the National Grid electricity transmission network and the gas transmission network by ensuring subdivision does not compromise its ongoing operation, maintenance and development.		operation and development of the National Grid is not compromised (Policy 10 of the NPSET). Subdivision is the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). The width of the National Grid Subdivision Corridor (and the National Grid Yard) are based on the position of the conductors in high wind and normal everyday conditions wind conditions respectively (along with providing space to access National Grid support structures) and are applied as consistent widths throughout the District. Specific to SUB-P31, while Transpower supports the intent of the policy, it submits that it does not adequately give effect to policy 10 of the NPSET in that it is not sufficiently directive. To give effect to the NPSET, Transpower seeks a National Grid specific policy that provides a clear policy directive to protect the National Grid and	***SUB-P31*** *Provide for the ~~National Grid electricity transmission network and the~~ gas transmission network by ensuring subdivision does not compromise its ongoing operation, maintenance and development.* Insert a new National Grid specific subdivision policy as follows: (shown as red text) ***SUB-PX*** *Manage subdivision within the National Grid Subdivision Corridor to avoid subsequent land use activities from compromising the efficient operation, maintenance, upgrading and development of the National Grid, and avoid the potential for reverse sensitivity effects on the National Grid.*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		only allow subdivision where it can be demonstrated the National Grid will not be compromised. Transpower supports separation of the National Grid from the Gas Transmission network given the national policy directive afforded to the National Grid in the NPSET.	
SUB-R1.1 to R1.20, the matters over which discretion is restricted: *f) Infrastructure provision; and* *g) Effects on existing infrastructure including the provision of easements where required; and* *h) Reverse sensitivity effects; and* *i) Vehicle access point(s) location and formation; and* *j) Whether the subdivision layout is accessible from and connected to surrounding neighbourhoods; and* *k) Whether the subdivision results in a use of land that is compatible with predominant character and function of the zone*	Support	Transpower supports the matters of discretion but submits they are not sufficiently directive for the National Grid. Transpower's preference is for a cross reference to the National Grid specific policy SUB-PX. Should this not be accepted, Transpower seeks additional criteria within the rule to address the matters within SUB-PX and provide sufficient guidance for plan users in determining resource consent applications for subdivision within the National Grid Subdivision Corridor.	Retain SUB-R1.1 to R1.20. Should cross reference to SUB-PX not be provided within the sought National Grid specific rule SUB-RX (sought below), Transpower seeks additional criteria within the rule SUB-R1.1 to R1.20 to address the matters within SUB-PX.
SUB-R1. Subdivision to create allotments in all zones	Oppose	Subdivision within the National Grid Subdivision Corridor is a restricted discretionary activity under the general (default) subdivision rule R1, reverting to a discretionary activity under rule SUB-R10 where the building platform standard (i) cannot be met.	Provide a new rule specific to the National Grid Subdivision Corridor as follows: ***SUB-RX*** ***Subdivision of land to create new allotment(s) within the National Grid Subdivision Corridor***

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		Transpower supports the restricted discretionary rule status but submits the present wording is not clear to plan users in that it would not be apparent Rule 1 applies to subdivision within the National Grid Subdivision Corridor and that the yard and access standards apply. Furthermore, the matters of discretion are not sufficiently directive in relation to the National Grid. Transpower seeks a specific standalone National Grid rule that provides for subdivision within the National Grid Yard as a restricted discretionary activity where a building platform is available outside the National Grid Yard, and vehicle access is not restricted. The activity status defaults to non-complying where the standards are not met. This would eliminate the need for rule SUB-R10 as the default non complying component (where the standards are not met) would be accommodated within the new rule. Specific to reasoning, a specific National Grid rule and restricted discretionary activity status for subdivision provides an appropriate incentive and opportunity to design subdivision layouts that avoid building sites within the National Grid Yard.	***All zones Activity status: Restricted discretionary*** *Where:* 1. *All resulting allotments demonstrate they are capable of accommodating a building platform for the likely principal building(s) and any building(s) for a sensitive activity outside of the National Grid Yard, other than where the allotments are for roads, access ways or network utilities; and* 2. *Existing vehicle access to National Grid assets is maintained.* *Matters over which discretion is restricted:* (a) *The extent to which the design and construction of any subdivision allows for earthworks, buildings and structures to comply within the safe separate distance requirements in the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001.*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		Subdivision is considered the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). Importantly, it also provides for Transpower input into the subdivision proposal process and provides the ability for council to decline an application. Additionally, the activity classification provides clear guidance for applicants and the Council to ensure the design of subdivision manages the effects of the network on the future use of the subdivided land and the effects of that land use on the network. The default non-complying status is supported where the standards cannot be met.	*(b) The ability for continued access to existing National Grid transmission lines for maintenance, inspections and upgrading.* *(c) The ability to provide a complying building platform outside of the National Grid Yard.* *(d) The extent to which the design and construction of the subdivision allows for activities to be set back from National Grid transmission lines to ensure adverse effects on and from the National Grid Transmission Network and on public safety are appropriately avoided, remedied or mitigated for example, through the location of roads and reserves under the route of the line.* *(e) The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid transmission lines, and how such landscaping will impact on the operation, maintenance, upgrade and*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			development (including access) of the National Grid. *(f) The provision for the ongoing efficient operation, maintenance, and planned upgrade of the National Grid transmission lines.* *(g) The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity and nuisance effects on the transmission asset.* *(h) The outcome of any technical advice provided by Transpower.* *(i) The risk of electrical hazards affecting public or individual safety, and the risk of property damage.* ***All zones*** ***Activity status: Non-complying*** *Where:* *(a) Compliance is not achieved with SUB-RX.* *Notification:* *• An application under this rule is precluded from being publicly notified in*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			accordance with section 95A of the RMA. *• When deciding whether any person is affected in relation to this rule, for the purposes of section 95E of the RMA, the Council will give specific consideration to any adverse effects on Transpower New Zealand Limited.*
SUB-R10 Subdivision within the National Grid Subdivision Corridor or in the vicinity of the gas transmission network *– All zones* *Activity status: DIS* *Where:* *1. The subdivision occurs on an allotment which:* *I. Cannot demonstrate that all resulting allotments are capable of accommodating a building platform for any building(s), which is located wholly outside the National Grid Yard; and/or* *II. Cannot demonstrate that all resulting allotments are capable of accommodating a building platform for any building(s), which is located at least 20 m from any gas transmission pipeline or at least 60 m from any above ground structure associated with the gas transmission network.* *Note: Transpower New Zealand Ltd and/or First Gas Ltd will be considered an affected person in accordance with section 95B of the RMA where its written approval is not provided*	Oppose	As proposed, subdivision within the National Grid Subdivision Corridor is a restricted discretionary activity under the general subdivision rule R1, reverting to a discretionary activity under rule SUB-R10 where the building platform standard (i) cannot be met. For the reasons outlined in the submission point relating to SUB-R1, Transpower does not support the rule and activity status. Instead, it seeks a standalone National Grid rule that provides for subdivision within the National Grid Yard as a restricted discretionary activity where a building platform is available outside the National Grid Yard, and vehicle access is not restricted. The activity status defaults to non-complying where the standards are not met.	Delete reference to the National Grid from SUB-R10 as follows: (shown as red text) and insert a new rule SUB-RX as outlined in the submission point on rule SUB-R1. ***SUB-R10*** ***Subdivision ~~within the National Grid Subdivision Corridor or~~ in the vicinity of the gas transmission network*** ***Activity status: DIS*** *Where:* *1. The subdivision occurs on an allotment which:* *~~(i) Cannot demonstrate that all resulting allotments are capable of accommodating a building platform for any building(s),~~*

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
			~~*which is located wholly outside the National Grid Yard; and/or*~~ *(ii) Cannot demonstrate that all resulting …….*
General District-Wide Matters			
32. Coastal Environment			
General Comment on whole Chapter and CE-P1, P3 , P5, P6 and P7	Amend	Chapter 19 provides a specific rule and policy framework for network utilities with specific National Grid policies provided (NU-P20 – P22). The National Grid specific policy NU-P22 adopts a seek to avoid approach for the coastal environment (noting that policy NU-P21 does not reference the coastal environment as there are no existing National Grid assets within the coastal environment). While the National Grid is addressed within Chapter 18 National Electricity and Gas Transmission and Chapter 19 Network Utilities, it is noted Infrastructure is referenced within CE-P6.2 and P7.2. Arguably the term 'Infrastructure' applies to the National Grid. Based on the above, and the specific provision of National Grid policies within Chapter 19 which have a seek to avoid approach to the coastal environment and	On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 32 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid (and specifically within policies CE-P1, P3, P5, P6 and P7) to give effect to the NPSET.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		the precedence clause within NU-P22(6), the interpretation of the PDP is that Chapter 19 prevails. On the basis the specific Chapter 19 National Grid policies prevail, Transpower is neutral on the Chapter 32 policies. However, should the above not be the case, Transpower seeks recognition of the National Grid (and specifically within policies CE-P1, P3, P5, P6 and P7) to give effect to the NPSET.	
33. Earthworks			
Rules - Overview *In addition to the provisions in this chapter, earthworks are also subject to additional provisions in the natural character, natural features and landscapes, natural hazards and coastal environment chapters. The provisions in these chapters relate to earthworks close to coastal and water body margins, on scheduled sites and features and in hazard areas and coastal hazard areas. Where the earthworks relate to sites and areas of significance to Māori, historic heritage and network utilities, the rules are contained within their relevant chapter.*	Support	Transpower supports reference that where the earthworks relate to network utilities, the rules are contained within their relevant chapter.	Retain the overview and approach to manage earthworks in relation to the National Grid within the relevant chapter.
General Comment on whole Chapter and EW-P1, P3 and P4	Support	Chapter 19 provides a specific rule and policy framework for network utilities with specific National Grid policies provided (NU-P20 – P22). Chapter 19 also contains a specific earthworks policy (EW-P7).	Retain policies EW-P1, P3 and P4.

Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief sought
		Notwithstanding Chapter 19, Transpower is generally supportive of earthwork policies EW-P1, P3 and P4.	
Part 3 – Area Specific Matters and Part 4 – Appendices and Maps			
Mapping and Designations			
National Grid line	Support	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". Transpower supports the identification of the 'National Grid Line' on the planning maps. The single line reflects the symbol within table 20 of the National Planning Standards	Retain the identification of the National Grid line on the planning maps.
55. Designations			
Designation **TPR01**	Support	Transpower supports the identification of the substation.	Retain the designation.

Appendix A National Grid Assets within the Waitomo District

Transpower Assets

Waitomo District

Legend

Territorial Land Authority
- Boundary

NZ Roads
- Highways

Transpower Assets
- Cable Protection Zone
- Overhead Fibre Cable
- Underground Fibre Cables

Site
- ACSTN
- COMMS
- HVDC
- TEE

Transmission Line
- 0kV Overhead
- 11, 66kV Underground
- 11, 33, 66 kV Overhead
- 110kV Underground
- 110 kV Overhead
- 220kV Underground
- 220 kV Overhead
- 350 kV Overhead
- 350kV Submarine
- 400kV Overhead

TRANSPOWER
Prepared by: Transpower Geospatial

Projection: NZTM 2000 Scale: 1:302,000 Plan Size: A3L

0 1,000 2,000 km

External Disclaimer

This document is produced for external release. Its conclusions are based on the information currently available to Transpower and may change as further information becomes available either internally or externally.

Date: 8/04/2020 *Drawn by: berrymanem*

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Appendix B National Policy Statement on Electricity Transmission 2008

NATIONAL POLICY STATEMENT

on Electricity Transmission

Issued by notice in the Gazette on 13 March 2008

CONTENTS

newzealand.govt.nz

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-ioninsing 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.

Objective 3.5 Energy

Energy use is managed, and electricity generation and transmission is operated, maintained, developed and upgraded, in a way that:

a) increases efficiency;

b) recognises any increasing demand for energy;

c) seeks opportunities to minimise demand for energy;

d) recognises and provides for the national significance of electricity transmission and renewable electricity generation activities;

e) recognises and provides for the national, regional and local benefits of electricity transmission and renewable electricity generation;

f) reduces reliance on fossil fuels over time;

g) addresses adverse effects on natural and physical resources;

h) recognises the technical and operational constraints of the electricity transmission network and electricity generation activities; and

i) recognises the contribution of existing and future electricity transmission and electricity generation activities to regional and national energy needs and security of supply.

Objective 3.12 Built environment

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

a) promoting positive indigenous biodiversity outcomes;

b) preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;

c) integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;

d) integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;

e) recognising and protecting the value and long-term benefits of regionally significant infrastructure;

f) protecting access to identified significant mineral resources;

g) minimising land use conflicts, including minimising potential for reverse sensitivity;

h) anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;

i) providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation;

j) promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and

k) providing for a range of commercial development to support the social and economic wellbeing of the region.

Policy 6.3 Co-ordinating growth and infrastructure

Management of the built environment ensures:

a) the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, in order to:

i) optimise the efficient and affordable provision of both the development and the infrastructure;

ii) maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;

iii) protect investment in existing infrastructure; and

iv) ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;

b) the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated;

c) the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and

d) a co-ordinated and integrated approach across regional and district boundaries and between agencies; and

e) that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.

Policy 6.6 Significant infrastructure and energy resources

Management of the built environment ensures particular regard is given to:

a) that the effectiveness and efficiency of existing and planned regionally significant infrastructure is protected;

b) the benefits that can be gained from the development and use of regionally significant infrastructure and energy resources, recognising and providing for the particular benefits of renewable electricity generation, electricity transmission, and municipal water supply; and

c) the locational and technical practicalities associated with renewable electricity generation and the technical and operational requirements of the electricity transmission network.

Implementation methods

6.6.2 Transmission corridor management approach

Waikato Regional Council will work with territorial authorities and energy companies and in consultation with other relevant industry organisations, to develop a transmission corridor management approach which:

a) recognises the benefits of the national electricity grid;

b) identifies key transmission corridors in district plans, and:

i) protects the corridor and electricity transmission network from inappropriate activities (including "sensitive activities", as defined in the National Policy Statement on Electricity Transmission); and

ii) manages the adverse effects (including reverse sensitivity effects) of subdivision, use and development on the operation, maintenance, upgrading and development of the electricity transmission network.

c) identifies and addresses potential effects on people and communities and natural and physical resources from new transmission infrastructure;

d) seeks opportunities for alignment with other infrastructure corridors;

e) recognises that energy companies may be affected parties with respect to land use change, including subdivision and development; and

f) seeks to manage the effects of third parties on the safe and efficient operation of the transmission network.

6.6.5 Measures to avoid adverse effects

Local authorities should ensure that appropriate measures are implemented to avoid adverse effects of development of the built environment on the safe, efficient and effective operation of regionally significant infrastructure. With respect to electricity transmission corridors, development of the built environment should also take into account National Policy Statements, National Environmental Standards and Transmission Corridor Guidelines as relevant to the circumstances.

6.6.6 Resilience of regionally significant infrastructure

Infrastructure providers should develop ways to maintain and improve the resilience of regionally significant infrastructure, such as through back-up systems and protection from the risk of natural hazards.

Explanation

Regionally significant infrastructure and energy resources support the wellbeing of the regional community. Much of this infrastructure and energy is also very important for New Zealand as a whole, such as energy and transport infrastructure that connects areas to the north, east and south of the Waikato Region. It is therefore very important that development of the built environment does not compromise the functioning of this infrastructure. Methods 6.6.1, 6.6.3, 6.6.4 and 6.6.5 are provided for this purpose. Policy 6.6(a) is intended to ensure the ongoing efficiency and effectiveness of regionally significant infrastructure, but does not imply that all adverse effects on that infrastructure must be avoided in all cases. If the adverse effects of a built environment proposal cannot practicably be avoided, then Methods 6.6.1(a), (b), (c) and (d) do not imply that the selected site should always be considered unsuitable as it may be possible to remedy or mitigate the adverse effects of concern.

Method 6.6.6 also seeks to protect regionally significant infrastructure from natural hazards.

The way in which the term 'planned' is to be applied is explained in the explanation to Policy 6.1. The significant transport corridors identified in Maps 6.1 and 6.1A reflect the strategic corridors identified in the operative Regional Land Transport Plan 2015-2045, which classifies them as nationally, regionally and sub-regionally significant. Significant transport corridors are equivalent to national, regional and sub-regional significant transport corridors in the Regional Land Transport Plan. New Zealand and the region will benefit from further development of infrastructure and energy resources.

Methods are provided to support such development in a way that appropriately manages potential adverse effects. Many effects of new electricity transmission, for example, could be avoided by appropriate siting of this infrastructure. This can be achieved through developing a transmission corridor management approach as described in Method 6.6.2. There is an increasing need for renewable energy, and renewable energy developments such as hydro-electric dams can be regionally significant. The potential for development of renewable energy resources can be reduced due to development of the built environment. The methods ensure this is recognised in district and regional plans. Decisions about the future location of some developments (such as rural residential development) should take into account the potential for locations to be used for future renewable energy developments.