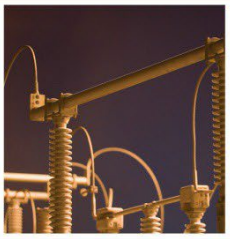
Submission by Transpower New Zealand Limited on Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Keeping the energy flowing






TRANSPOWER

Transpower New Zealand Limited

Trudi Burney – Senior Environmental Planner
Environmental Policy and Planning Group
Address: 31 Gilberthorpes Road, Islington 8042, Christchurch

Email: environment.policy@transpower.co.nz

Phone (03) 590 7126

(Address for Service)

FORM 5
SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED
ON PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE TO
THE RESOURCE MANAGEMENT ACT 1991

To:
Greater Wellington Regional Council
Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

By email: regionalplan@gw.govt.nz

Name of Submitter:
Transpower New Zealand Ltd

Transpower could not gain advantage in trade competition through this submission

The specific provisions of the proposed plan that the submission relates to are:
Refer attached submission which outlines the specific provisions, reasons and decisions/amendments sought.

Transpower NZ Ltd wishes to be heard in support of its submission.

Signature of submitter
[or person authorised to sign on behalf of the submitter.]

Date: 4 October 2022

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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.

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.

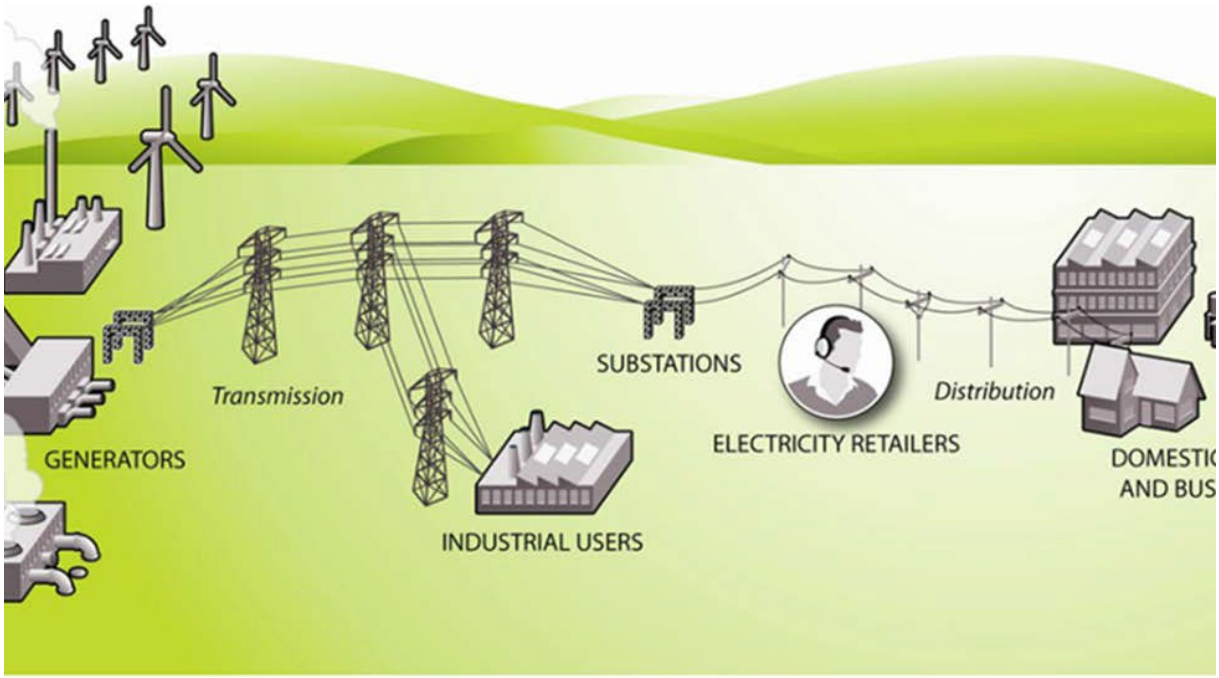


Figure 1. Role of Transpower in New Zealand's electricity industry. (Source: MBIE)

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 ensure 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 Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), and the Electricity (Hazards from Trees) Regulations 2003.

Wellington Region Assets

Transpower's assets across the Greater Wellington region include substations, communications sites, transmission lines and support structures (including the related telecommunications system).

The following National Grid assets are within or traverse the Greater Wellington Region:

- National Grid Transmission Lines (25 lines in total)
  - Bunnythorpe-Haywards A (BPE-HAY A) 220 kV single circuit line on steel towers.
  - Bunnythorpe-Haywards B (BPE-HAY B), 220kV single circuit line on steel towers.

- Bunnythorpe-Wilton A (BPE-WIL A), 220kV double circuit line on steel towers.
- Central Park-Wilton A (CPK- WIL A), 110kV double circuit line on steel towers.
- Central Park-Wilton B (CPK-WIL B), 220kV double circuit line on steel towers.
- Gracefield-Haywards A (GFD-HAY A), 110KV double circuit line on steel towers.
- Haywards-Judgeford A (HAY-JFD A), 220kV double circuit line on steel towers.
- Haywards-Melling A (HAY-MLG A), 100kV double circuit lines on steel towers.
- Haywards-Melling B (HAY-MLG B), 110kV double circuit lines on steel towers.
- Haywards-Takapu Road (HAY-TKR A), 110kV double circuit lines on steel towers.
- Haywards-Upper Hutt A (HAY-UHT A), 110kV double circuit lines on steel towers.
- Khandallah-Takapu Road A (KHD-TKR A), 110kV double circuit lines on steel towers.
- Kaiwharawhara-Wilton A (KWA-WIL A), 110kV double circuit lines on steel towers.
- Mangamaire-Masterton A (MGM-MST A), 110kV single circuit lines on poles.
- Masterton-Upper Hutt A (MST-UHT A), 110kV double circuit lines on steel towers.
- Oteranga Bay-Haywards A (OTB-HAY A), 350kV double circuit lines on steel towers.
- Paraparaumu Tee A (PRM-TEE A), 220kV single circuit lines on pi poles.
- Paraparaumu Tee B (PRM-TEE B), 220kV single circuit lines on pi poles.
- South Markara Road to Oteranga Bay A (SMK-OTB A), 110kV single circuit lines on poles.
- Te Hikowhenua Deviation A (THW-DEV-A), single circuit lines on steel towers and poles
- Takapu Road-Wilton A (TKR-WIL-A), 110kV double circuit lines on steel towers.
- West Wind Tee (WWD-TEE-A), 110kV double circuit lines on poles.

- Three submarine cables across the Cook Strait; South Markara Road-Oteranga Bay A, poles 1A to 1B (SMK-OTB-A1-CBL-1A-1B), which transmits electricity between the North and South Islands (commonly known as 'The Cook Strait Cables').
- High Voltage Direct Current (HVDC) links (four in total); Haywards DC (HAY-DC), Miramar Cable Store (MCS), Oteranga Bay (OTB), and Te Hikowhenua Electrode (THW).
- Overhead fibre cables (five in total); Bunnythorpe-Wilton A, Central Park-Wilton B, Haywards-Judgeford A, Haywards-Takapu Road, Oteranga Bay-Haywards A.
- Substations (12 in total):
    - Within the Wellington City; Central Park Substation (CPK), Kaiwharawhara substation (KWA), Wilton substation (WIL), West Wind substation (WWD).
    - Within the Hutt City; Gracefied Substation (GFD), Melling substation (MLG), Haywards substation (HAY).

- Within the Upper Hutt City; Upper Hutt Substation (UHT).
- Within the South Wairarapa District, Greytown substation (GYT).
- Within the Porirua City, Pauatahanui Substation (PNI), Takapu Road Substation (TKR).
- Within the Kapiti Coast District; Paraparaumu Substation (PRM).
- Within the Caterton District; Masterton Substation (MST).

- Communications sites (seven in total); Axa House, Kaukau, Makara Village Repeater, Transpower House, Rangitumau, Mt Climie, Mt Bruce.

Refer to Appendix A for a map showing the location of these lines and substations.

Collectively, these assets assist Transpower in servicing the Wellington region, as well as the rest of New Zealand. The ongoing operation, maintenance, upgrading and development of these assets is essential to achieving wider social, economic, cultural and environmental benefits for the region. Transpower's electricity infrastructure is a significant physical resource for the purposes of section 7 of the Resource Management Act 1991 (RMA), and must be sustainably managed, and any adverse effects on that infrastructure should be avoided, remedied or mitigated.

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 National Grid. The NPSET only applies to the National Grid – the assets used, operated or owned by Transpower – and not to electricity generation or distribution networks. A copy of the NPSET is attached as Appendix B.

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 Objective is implemented by fourteen policies. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. In a general sense these policies address the following:

- Policy 1: Recognising the benefits of the National Grid;
- Policy 2: Recognising and providing for the effective operation, maintenance, upgrading and development of the National Grid;

- Policies 3 to 5: Weighing the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;
- Policies 10 and 11: Managing adverse effects on the National Grid and providing for "buffer corridors";
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Section 62(3) of the RMA requires that a regional policy statement 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 regional policy reflects national direction and that the regional 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.

Summary

Given the above statutory and policy framework, it is important given its national and regional significance, that the management of the National Grid is properly addressed in the Regional Policy Statement.

The following submission points relate to specific elements of Plan Change 1 to the Regional Policy Statement which are supported by Transpower, or others where amendments to specific provisions are sought.

Transpower's Submission on Plan Change 1 to the RPS

Transpower recognises that the purpose of Plan Change 1 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD), and to start the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM). In enabling housing intensification, it is important that this is supported by appropriate infrastructure and that the development and maintenance of this infrastructure is enabled.

For Transpower, the provisions of the RPS need to ensure the National Policy Statement on Electricity Transmission 2008 (NPSET) is given effect too. This may require wider changes than those within scope of PC1.

Comments against specific proposed changes in Plan Change 1 are set out in the table below. Amendments proposed through PC1 as notified are shown as ~~black strikethrough~~ and underline text. 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 Change Provision	Reasons	Amendment Sought
Policy 7		
Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – district and regional plans District and regional plans shall include policies and/or methods that recognise: **(a)** the social, economic, cultural and environmental benefits of *regionally significant infrastructure*, and in particular low and zero carbon *regionally significant infrastructure* including: (i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes; (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services; (iii) people have access to energy, and preferably low or zero carbon energy, so as to meet their needs; and (iv) people have access to telecommunication services. **(b)** the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including: (i) security of supply and diversification of our energy sources; (ii) reducing dependency on imported energy resources; and (iii) reducing greenhouse gas *emissions*. **Explanation** Notwithstanding that renewable energy generation and *regionally significant infrastructure* can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if *regionally significant infrastructure* is a low or zero carbon development.	Transpower supports Policy 7 recognising the importance of transmission infrastructure that distributes renewable or zero/low carbon energy. The proposed changes to Policy 7 introduce the term "low and zero carbon". This is used in Policy 7 in the context of "low and zero carbon regionally significant infrastructure", "low or zero carbon multi modal travel modes" and "low or zero carbon energy". The term "low or zero carbon", or similar, is used elsewhere in Plan Change 1, particularly in relation to transport, including Policy 9, which refers to "the uptake of low emission or zero carbon fuels, biofuels and new technologies" and Policy 57 which refers to a "move towards low and zero-carbon modes". The term "low or zero carbon" has not been defined and it is unclear what it is intended to mean, particularly in the context of "low and zero carbon regionally significant infrastructure" in Policy 7. It is unclear whether the policy is referring to regionally significant infrastructure itself being low or zero carbon or whether it is a reference to a particular kind of regionally significant infrastructure that supports low/zero carbon	**Clarify** the term "low and zero carbon", particularly in relation to regionally significant infrastructure, and how it is applied. **Amend** Policy 7 to recognise and provide for electricity transmission. Transpower requests the insertion of a new (a)(iv): *District and regional plans shall include policies and/or methods that recognise:* *(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including:* *(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes;* *(ii) public health and safety is maintained through the provision of essential services: - supply of potable*

Specific Plan Change Provision	Reasons	Amendment Sought
~~Energy generated from renewable energy resources and regionally significant infrastructure can provide benefits both within and outside the region. Renewable energy benefits are not only generated by large scale renewable energy projects but also smaller scale projects.~~ ~~Renewable energy means energy produced from solar, wind, hydro, geothermal, biomass, tidal wave and ocean current sources.~~ ~~Renewable energy generation and regionally significant infrastructure can also have adverse effects on the surrounding environment and community. These competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances.~~ ~~Imported and non-renewable energy sources include oil, gas, natural gas and coal.~~ ~~When considering the benefits from renewable energy generation the contribution towards national goals in the New Zealand Energy Strategy (2007) and the National Energy Efficiency and Conservation Strategy (2007) will also need to be given regard.~~ ~~Regionally significant infrastructure is defined in Appendix 3.~~	emissions (for example a renewable energy supply, a transmission network to distribute renewable energy, a multi-modal transport network) or both. The Explanation does not aid the interpretation and it is not clear what is meant by "in particular if regionally significant infrastructure is a low or zero carbon development". Within Policy 7 the terms "low or zero carbon energy" and "renewable energy resources" are both used and it is unclear whether this is a deliberate distinction. The explanation of 'renewable energy' is proposed to be deleted from the explanation. As the policy covers several rather distinct elements, it would be clearer if different elements could be more clearly articulated and distinguished within the existing Policy 7. Transpower notes that the policy refers to people having access to energy and requests specific recognition be included in the policy of the transmission system required to enable that access to energy. Such policy recognition would give effect to Policy 1 of the NPSET which requires decision makers to recognise and provide for the benefits of sustainable, secure and efficient electricity transmission.	*water, the collection and transfer of sewage and stormwater, and the provision of emergency services;* *(iii) people have access to energy, and preferably low or zero carbon energy, so as to meet their needs;* ~~*and*~~ *(iv) the provision of an efficient and effective electricity transmission system; and* *(~~i~~v) people have access to telecommunication services.*

Specific Plan Change Provision	Reasons	Amendment Sought
Policy 24		
Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans FW By 30 June 2025, ~~D~~district and regional plans shall include policies, rules and methods to *protect* indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of *biodiversity offsetting* or *biodiversity compensation* for an ecosystem or habitat with significant indigenous biodiversity values, they shall: (a) not provide for *biodiversity offsetting*: (i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or (ii) when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is *threatened* or the ecosystem is *naturally uncommon;* (b) not provide for *biodiversity compensation* where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is *threatened* or the ecosystem is *naturally uncommon;* (c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to *biodiversity offsetting* and *biodiversity compensation*); (d) require that the outcome sought from the use of *biodiversity offsetting* is at least a 10 percent net biodiversity gain, or from *biodiversity compensation* is at least a 10 percent net biodiversity benefit. **Explanation** Policy 24 applies to provisions in regional and district plans. The policy provides clarity about the limits to, and expected outcomes from, *biodiversity offsetting* and *biodiversity compensation* for an ecosystem or habitat with significant indigenous biodiversity values. Ecosystems and species known to meet the criteria in clauses (a and b) are listed in Appendix 1A (Limits to *biodiversity offsetting* and *biodiversity compensation*).	Transpower opposes the amendments to Policy 24. Transpower is concerned that the amendments to Policy 24 are overly broad in their application and potentially impractical to implement in practice. They do not recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations. In some situations this may mean that biodiversity offsetting or biodiversity compensation is required. Furthermore, Appendix 1A is very extensive in the ecosystems and specifies it applies to. The Minister for the Environment, in outlining the role of environmental limits and targets in the reformed resource management system, has confirmed that infrastructure will be exempt from complying with limits where it cannot be situated anywhere else, with offsetting required if needed. (https://www.beehive.govt.nz/speech/how-future-resource-management-system-will-better-enable-development-outcomes)	**Amend** Policy 24 to recognise that regionally significant infrastructure may have a functional or operational need to locate in a particular location. This could be achieved by adding a qualifying statement: *This does not apply to nationally and regionally significant infrastructure that has a functional or operational need to locate in a particular location. In the case of the National Grid, following a route, site and method selection process and having regard to the technical and operational constraints of the network, new development or major upgrades of the National Grid shall seek to avoid adverse effects, and otherwise remedy or mitigate adverse effects, on ecosystems or habitats with significant indigenous biodiversity values.*

Specific Plan Change Provision	Reasons	Amendment Sought
Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the outcomes achievable through the use of offsetting and compensation are different. An offsetting 'net biodiversity gain' outcome is expected to achieve an objectively verifiable increase in biodiversity values while a compensation 'net biodiversity benefit' outcome is more subjective and less preferable. Table 16 in Appendix 1 identifies rivers and lakes with significant indigenous ecosystems and habitats with significant indigenous biodiversity values by applying criteria taken from policy 23 of rarity (habitat for threatened indigenous fish species) and diversity (high macroinvertebrate community health, habitat for six or more migratory indigenous fish species). Policy 47 will need to be considered alongside policy 24 when changing, varying or reviewing a regional or district plan. Policy 24 is not intended to prevent change, but rather to ensure that change is carefully considered and is appropriate in relation to the biodiversity values identified in policy 23.		
Policy 29		
Policy 29: ~~Avoiding inappropriate~~ Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans Regional and district plans shall: (a) identify areas affected by natural hazards; and (b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon; (c) include objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, polices and rules to avoid subdivision, use or development and *hazard sensitive activities* where the hazards and risks are assessed as high to extreme.	Transpower considers that Policy 29 would benefit from clarification of what is meant by a a 'low', 'moderate', 'high' or 'extreme' hazard or risk. The use of "low to moderate" in (c) and "high to extreme" in (d) makes it unclear whether it means low or moderate or a separate category of 'low to moderate'. Our interpretation of Policy 29 is that (d) only applies where both hazards and risks are high to extreme, so an activity could locate in a high	**Define** the terms used in Policy 29 or provide the reader with guidance. For example. in the Explanation, on where definition of these terms can be found. **Clarify** the wording of Policy 29 in relation to hazards and risks and different hazard and risk levels or categories.

Specific Plan Change Provision	Reasons	Amendment Sought
	hazard area if the risk was moderate. However, this also needs clarification.	
Policy 39		
Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to: (a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or *regionally significant infrastructure*, in particular where it contributes to reducing greenhouse gas *emissions*; and (b) protecting *regionally significant infrastructure* from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and (c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and (d) significant wind, solar and marine renewable energy resources within the region. **Explanation** Notwithstanding that renewable energy generation and *regionally significant infrastructure* can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas *emissions*. ~~The benefits of energy generated from renewable energy resources include:~~ • ~~Security of and the diversification of our energy sources~~ • ~~Reducing our dependency on imported energy resources – such as oil, natural gas and coal~~ • ~~Reducing greenhouse gas emissions~~ • ~~Contribution to the national renewable energy target~~	Transpower supports the explanation recognising that regionally significant infrastructure can provide benefits, noting that Transpower's transmission lines play an important role in transmitting renewable energy. As for Policy 7, Policy 39 covers several rather distinct elements. While Transpower does not oppose the addition of the text in (a) referencing reducing greenhouse gas emissions, Transpower submits clause d) of the policy could benefit from greater recognition of the need for transmission of the energy and electricity generation. Such reference would give effect to the NPSET.	**Amend** Policy 39(d) to recognise high voltage electricity transmission. ….. *(d) significant wind, solar and marine renewable energy resources within the region and the operation, maintenance, upgrade and development of the electricity transmission network to support the transmission of the renewable energy resource.*

Specific Plan Change Provision	Reasons	Amendment Sought
~~The benefits are not only generated by large scale renewable energy projects but also smaller scale, distributed generation projects.~~ ~~The benefits of regionally significant infrastructure include:~~ • ~~People and goods can efficiently and safely move around the region, and to and from~~ • ~~Public health and safety is maintained through the provision of essential services – such as potable water and the collection and transfer of sewage or stormwater~~ • ~~People have access to energy to meet their needs~~ • ~~People have access to telecommunication services~~ ~~Energy generation from renewable energy and regionally significant infrastructure (as defined in Appendix 3) can provide benefits both within and outside the region.~~ ~~Renewable energy generation and regionally significant infrastructure can also have adverse effects on the surrounding environment and community. These competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances.~~ ~~When considering the benefits from renewable energy generation, the contribution towards national goals in the New Zealand Energy Strategy (2007) and the National Energy Efficiency and Conservation Strategy (2007) will also need to be given regard.~~ ~~Potential significant sites for development of Wellington region's marine and wind resources have been identified in reports 'Marine Energy – Development of Marine Energy in New Zealand with particular reference to the Greater Wellington Region Case Study by Power Projects Ltd, June 2008' and 'Wind Energy – Estimation of Wind Speed in the Greater Wellington Region, NIWA, January 2008'.~~ ~~Policy 39(a) shall cease to have effect once policy 9 is given effect in a relevant district or regional plan.~~ ~~Policy 39(b) shall cease to have effect once policy 8 is given effect in a relevant district or regional plan.~~		

Specific Plan Change Provision	Reasons	Amendment Sought
Policy 55		
Amend Policy 55 as follows: Policy 55: Providing for appropriate urban expansion ~~Maintaining a compact, well designed and sustainable regional form –~~ consideration FW When considering an application for a resource consent, or a change, variation or review of a district plan for *urban* development beyond the region's *urban areas* (as at ~~March 2009~~August 2022), particular regard shall be given to whether: (a) the *urban* ~~proposed~~ *development* ~~is the most appropriate option to achieve Objective 22~~ contributes to establishing or maintaining the qualities of a well-functioning *urban environment*, including: (i) the *urban development* will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. *Protecting* indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. *Protecting* outstanding natural features and landscape values as identified by Policy 25, 4. *Protecting* historic heritage values as identified by Policy 22, 5. Integrates *Te Mana o Te Wai* consistent with Policy 42, 6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17. 7. Recognises and provides for values of significance to mana whenua / tangata whenua, 8. Protecting *Regionally Significant Infrastructure* as identified by Policy 8; and	Transpower supports the inclusion of (a)(ii)(8) "Protecting Regionally Significant Infrastructure as identified by Policy 8", noting the importance of protecting regionally significant infrastructure from reverse sensitivity effects and that the NPS-UD 3.32(1)(c) and RMA Section 77I(e) identify any "matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure" as a 'qualifying matter'. Standards may be less enabling of development to accommodate a qualifying matter.	**Retain** Policy 55(a)(ii)(8)

Specific Plan Change Provision	Reasons	Amendment Sought
(b) the ~~proposed~~ *urban development* is consistent with any *Future Development Strategy*, or the ~~Council's~~ regional or local strategic growth and/or development framework or strategy that describes where and how future *urban development* should occur in that district or region, should the *Future Development Strategy* be yet to be released; and~~/or~~ (c) a structure plan has been prepared~~.~~; and/or (d) Any *urban development* that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies. **Explanation** Policy 55 gives direction to the matters that must be considered in any proposal that will result in urban development occurring beyond the region's existing urban areas. This includes ensuring that the qualities and characteristics of a well-functioning *urban environment* are provided for through clause (a), which includes recognising values or resources identified elsewhere in the RPS. Clause (b) requires consideration to be given to the consistency of the development with the *Future Development Strategy* which will look to deliver well-functioning *urban environments* through a regional spatial plan. To provide for the interim period where the *Future Development Strategy* is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is currently the Wellington Regional Growth Framework. Clause (c) requires consideration to be given to whether a structure plan has been provided. A structure plan is a framework to guide the development or redevelopment of an area by defining the future development and land use patterns, areas of open space, the layout and nature of infrastructure (including transportation links), and other key features and constraints that influence how the effects of development are to be managed. Clause (d) requires consideration of any proposal that would add significantly to development capacity, regardless of whether it is out of sequence or unanticipated by growth or development strategies. This clause gives effect to Policy 8 of the National Policy Statement on Urban Development. Clause (d) should be considered in conjunction with Policy UD.3.		

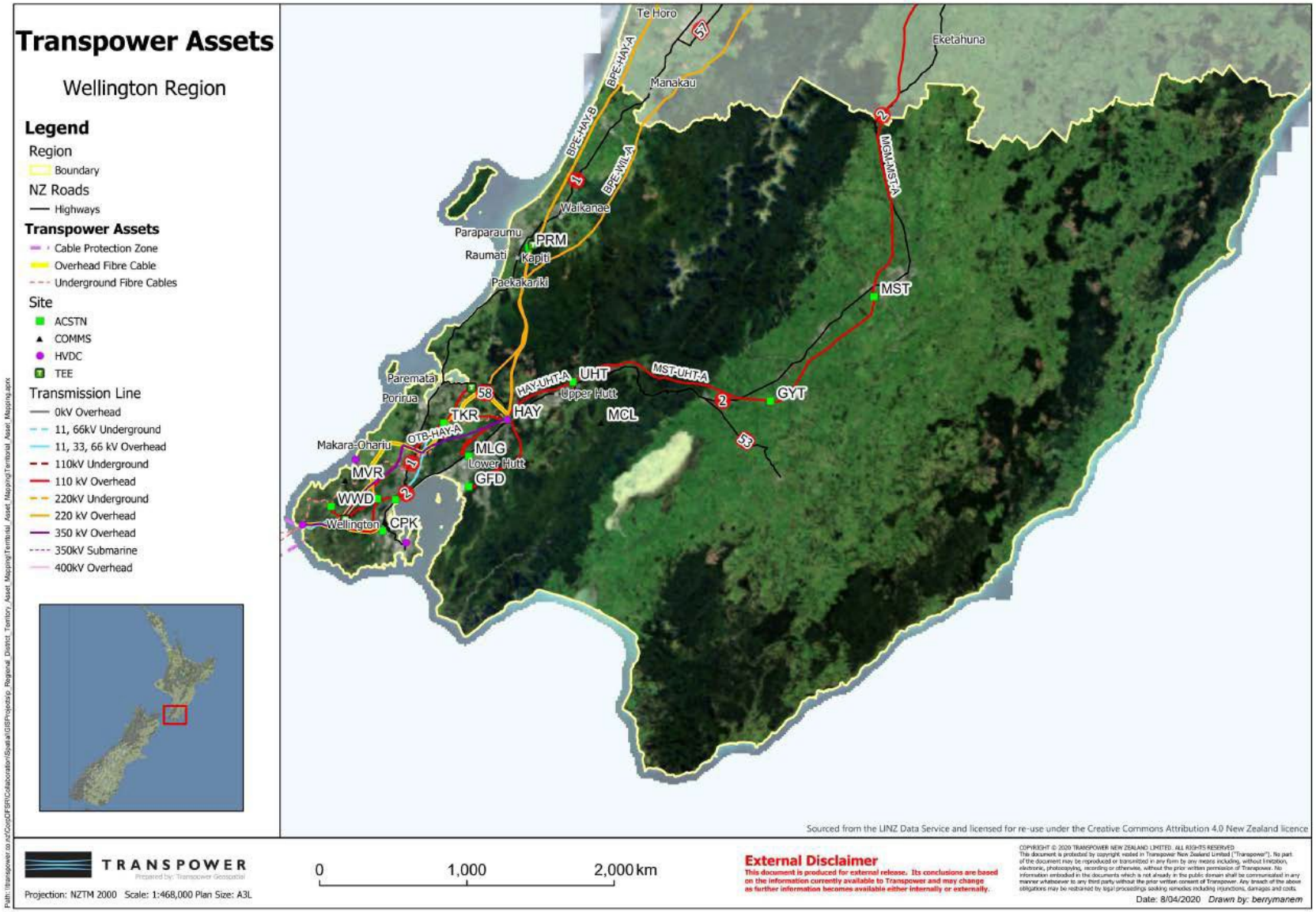
Specific Plan Change Provision	Reasons	Amendment Sought
~~Urban development beyond the region's urban areas has the potential to reinforce or undermine a compact and well designed regional form.~~ ~~The region's urban areas (as at March 2009) include urban, residential, suburban, town centre, commercial, community, business and industrial zones identified in the Wellington city, Porirua city, Lower Hutt city, Upper Hutt city, Kāpiti coast and Wairarapa combined district plans.~~ ~~Urban development is subdivision, use and development that is characterised by its planned reliance on reticulated services (such as water supply and drainage) by its generation of traffic, and would include activities (such as manufacturing), which are usually provided for in urban areas. It also typically has lot sizes of less than 3000 square metres.~~ ~~Examples of growth and/or development frameworks or strategies in the region are:~~ ~~• The Upper Hutt City Council Urban Growth Strategy~~ ~~• Wellington City Northern Growth Management Framework~~ ~~• Porirua City Development Framework~~ ~~• Kapiti Coast: Choosing Futures Development Management Strategy and local outcome statements contained in the Kapiti Coast Long Term Council Community Plan~~ ~~Policies 54 and 56 also need to be considered in conjunction with policy 55. In addition, there are also a range of 'related policies' in the Regional Policy Statement that set out matters to be considered in order to manage effects on natural and physical resources.~~ ~~Structure planning integrates land use with infrastructure – such as transport networks, community services and the physical resources. Structure planning should also deliver high quality urban design.~~ ~~The content and detail of structure plans will vary depending on the scale of development.~~		

Specific Plan Change Provision	Reasons	Amendment Sought
~~Notwithstanding this, structure plans, as a minimum, should address:~~ ~~• Provision of an appropriate mix of land uses and land use densities~~ ~~• How environmental constraints (for example, areas at high risk from natural hazards) and areas of value (for example, indigenous ecosystems, rivers, streams and ephemeral streams, wetlands, areas or places with historic heritage, outstanding landscapes, or special amenity landscapes) are to be managed~~ ~~• Integration with existing and proposed infrastructure services, such as, connections to existing and proposed transportation systems and provision of public and active transport linkages by undertaking an integrated transport assessment~~ ~~• The integration of the development with adjoining land use activities including measures to avoid, remedy or mitigate reverse sensitivity effects~~ ~~• Integration of social infrastructure and essential social services as necessary~~ ~~• Development staging or sequencing~~ ~~How the region's urban design principles[8] will be implemented~~		
Policy 58		
Amend Policy 58 as follows: Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, require all new urban development including form, layout, location, and timing is sequenced in a way that: (a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and (b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.	Transpower supports requiring new urban development in a way that is coordinated with infrastructure as proposed in Policy 58. Transpower considers that it is important to provide policy direction to enable the infrastructure to support the urban development. The RPS would benefit from policy supporting the regionally significant infrastructure that is required to support urban development. Transpower considers that this would be best achieved by amending Policy 7 as requested elsewhere in this submission.	**Retain** Policy 58, but **amend** Policy 7 to provide direction supporting the regionally significant infrastructure that is required to support urban development.

Specific Plan Change Provision	Reasons	Amendment Sought
~~particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:~~ ~~(a) make efficient and safe use of existing infrastructure capacity; and/or~~ ~~(b) coordinate with the development and operation of new infrastructure.~~ **Explanation** Policy 58 requires development to be sequenced such that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both three waters infrastructure and transport infrastructure that would be necessary to support the development. ~~Subdivision, use and development, (including infrastructure) decisions have a direct bearing upon or relationship to the sequencing and development of new infrastructure, including new infrastructure for the electricity transmission network and the region's strategic transport network. The region's strategic transport network is described in the Wellington Regional Land Transport Strategy 2007-2016.~~		
Definition National Grid		
National grid FW National grid as defined by the Electricity Industry Act 2010.	The National Grid as defined in the Electricity Industry Act 2010 means *the lines and associated equipment used or owned by Transpower to convey equipment.* The definition within the NPSET means *the assets used or owned by Transpower NZ Ltd.* While Transpower supports the provision of a definition of National Gird, it seeks amendment to the definition to refer to that provided within the National Policy Statement for Electricity Transmission 2008 given the National Policy Statement is a RMA policy document, and the wider definition includes assets such as access tracks which are used by Transpower.	Amend the definition of National Grid as follows: *National grid as defined by the ~~Electricity Industry Act 2010.~~ National Policy Statement for Electricity Transmission 2008.*

Specific Plan Change Provision	Reasons	Amendment Sought
Definition Regionally Significant Infrastructure		
Regionally significant infrastructure FW Regionally significant infrastructure includes: • pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment • a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001 • a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989 • the *National grid* • facilities for the generation and/or transmission of electricity where it is supplied to the *National grid* and/or the local distribution network ..... ~~• pipelines for the distribution or transmission of natural or manufactured gas or petroleum~~ ~~• strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001~~ ~~• strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989~~ ~~• the national electricity grid, as defined by the Electricity Governance Rules 2003~~ ~~• facilities for the generation and transmission of electricity where it is supplied to the network, as defined by the Electricity Governance Rules 2003~~	Transpower supports the amended definition of Regionally Significant Infrastructure as it relates to the National Grid.	Retain the amended definition.

Appendix A – National Grid assets within the Greater Wellington Region



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.