

To: Wellington Regional Council

Submission by Transpower NZ Limited on the  
Proposed Regional Policy Statement for the  
Wellington Region

29 May 2009

*Keeping the energy flowing*



TRANSPOWER



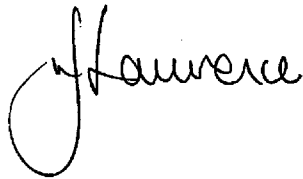
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**NOTICE OF SUBMISSION TO THE PROPOSED WELLINGTON REGIONAL  
POLICY STATEMENT (“RPS”) PURSUANT TO CLAUSE 6 OF THE FIRST  
SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

**A. INTRODUCTION**

Transpower New Zealand Limited (“Transpower”) is the State Owned Enterprise that owns, maintains, operates and develops New Zealand’s high voltage transmission network, the National Grid. The National Grid comprises of a network of steel towers, poles, lines and substations which transports the electricity generated by power stations to the distribution networks of each region, which in turn conveys electricity energy to domestic, commercial and industrial users in the region.

The National Grid comprises some 13,000 km of transmission lines and some 186 substations, including outdoor switch-yards (substations attached to power generation plants which feed into the Grid). The control centre (located in Wellington) operates a network of some 300 telecommunication sites, most of which operate on a line of sight basis and link together the components that make up the National Grid.

Under the Resource Management Act 1991 (RMA), Transpower’s electricity infrastructure is a significant physical resource that must be sustainably managed, and any adverse effects on that infrastructure must be avoided, remedied or mitigated. The National Policy Statement on Electricity Transmission 2008 (NPSET) confirms the national significance of the resource and the need to appropriately manage activities and development close to it. The RMA amendment to Regulation 10 (Forms, Fees and Procedures), section 2(i) further acknowledges the importance of Transpower’s National Grid assets, requiring Transpower to be served notice of applications or reviews that may affect the National Grid. In addition, RMA section 30(1)(gb) sets further responsibilities for regional councils’ to manage the strategic integration of infrastructure with land use.

It is therefore appropriate, given the national and regional significance of the National Grid, that its management is comprehensively addressed in the Wellington RPS. It is appropriate that the Regional Policy Statement contains close and practical linkages between its objectives, policies and methods relating to the physical resources, at both the regional and district level. This will facilitate integrated resource management occurring within the region, particularly as it relates to significant physical resources, such as the National Grid.

Transpower made a submission on the draft RPS, and invites the Council to refer to that submission for additional background information. Transpower also acknowledges the extent to which the principles of that submission have been reflected in the RPS.

**B. THE SPECIFIC PROVISIONS OF THE PROPOSED RPS THAT  
TRANSPOWER’S SUBMISSION RELATES TO**

This submission relates specifically to the provisions of the proposed RPS as listed:

1. General comments;
2. Introduction (Chapter 1);

3. Application of the RPS across physical and jurisdictional boundaries (Section 2.5);
4. Energy, Infrastructure and Waste (Section 3.3);
5. Regulatory policies (Sections 4.1 and 4.2) – Proposed Policies 6, 7 and 38; definition of '*regionally significant infrastructure*'; and the omission of policies relating to the adverse effects of transmission activities and long term planning for the National Grid;
6. Methods to implement policies (Section 4.5) – Proposed Methods 1, 2, 4 and 35;
7. Coastal Environment (Section 3.2) – Introduction; Objectives 3 and 4;
8. Historic Heritage (Section 3.5) – Objective 15;
9. Landscape (Section 3.7) – Objective 17; Policies 24-27 and 49;
10. Natural Hazards (Section 3.8) – Objectives 18 and 19; Policy 28; AER 18;
11. Regional Form, Design and Function (Section 3.9) – Objective 21;
12. Anticipated Environmental Results (Section 5.2) –Objective 10.

Transpower's rationale for its submission on each of these provisions, and the relief sought, follows below.

## 1. General comments

- 1.1 Transpower seeks to ensure that the RPS for Wellington contains appropriate provisions to ensure that it can provide adequate guidance in the development of any new district plan and/or plan changes. More specifically, the RPS needs to adequately provide for the core strategic infrastructure that is required to support growth within the Wellington region and across New Zealand.
- 1.2 The provisions of the Proposed RPS for the Wellington Region need to:
  - Recognise the benefits of the National Grid.
  - Ensure and protect the ability for ongoing operation and maintenance of the network;
  - Enable the existing network to be upgraded in order to meet growth in power demand;
  - Protect the existing network from issues of reverse sensitivity; and
  - Provide an appropriate policy framework for the development of new lines.
- 1.3 The Proposed RPS goes some way to achieving these outcomes. In particular it recognises the benefits of regionally significant infrastructure, and seeks to protect regionally significant infrastructure from new and incompatible land uses. Acceptable provisions are identified and sought to be retained. However some modifications and/or clarifications are required to the existing text and additional text is required in order to address all of the relevant resource management issues identified above.

### 1. Relief Sought:

- A. **Amend** the Proposed RPS to make all required changes, including those detailed in this submission, to ensure:
  - That the NPSET is given effect to;
  - The sustainable management of the National Grid as a physical resource;

- Appropriate provision for the ongoing operation and maintenance of the network, including ensuring that lines can be accessed;
- That the existing network can be upgraded in order to meet growth in energy demand;
- The protection of the existing network from issues of reverse sensitivity and the effects of others' activities; and
- Appropriate provision for the planning and development of new lines.

## **2. Introduction (Section 1)**

- 2.1 The NPSET confirms the national significance of the resource and the need to appropriately manage activities and development close to it. Councils must give effect as appropriate to the provisions of the NPSET in their policy statements and plans.

### **2. Relief Sought:**

- A. Retain** without modification the recognition of the NPSET in Section 1.3 and the reference to the NESET in Section 1.3

## **3. Application of the RPS across physical and jurisdictional boundaries (Section 2.5)**

- 3.1 The National Grid has a reasonably uniform scale, nature, form and function throughout the country. There is therefore a consistency of effects of and on the Grid, varying only in relation to the broad nature of the receiving environment. Furthermore it is operated, developed and maintained over distances that span numerous zones within a territorial authority and traverse all but one local authority within the country.
- 3.2 Although the physical nature of transmission lines is relatively constant, there can be widely varying and quite inconsistent planning constraints on a particular line as it passes across different zones and jurisdictional boundaries. While the text is generally supported, Section 2.5 would benefit from a clearer statement regarding the need for a consistent approach to be taken to the management of the National Grid.

### **3.0 Relief Sought:**

- A. Amend** Section 2.5 to clearly identify the need for a consistent approach to be taken to lineal network utilities, including the National Grid. This could be achieved by including text to the following effect:

*Promote a collaborative and consistent approach to managing regionally significant infrastructure that crosses zone and/or territorial boundaries.*

#### **4. Energy, Infrastructure and Waste (Section 3.3)**

- 4.1 Recognition of the benefits of infrastructure and that infrastructure can be adversely affected by development in paragraph 1 of the 'Infrastructure' subsection (p28) is supported.
- 4.2 Paragraph 2 recognises the NPSET, identifying that it sets out objectives and policies to enable the management of effects on the electricity transmission network, recognising the vital role of the National Grid and that electricity transmission is to be considered a matter of national significance. While the text is largely supported, Transpower does not consider that it incorporates "enabling the management of the effects of the electricity transmission network including the effects of upgrading existing lines and the development of new lines" as per the objectives and policies of the NPSET.
- 4.3 Possibly the Council considers that this matter falls within the broad heading of "recognising the benefits of infrastructure". However in Transpower's view, informed by the NPSET, "managing the effects of the electricity transmission network" is a specific issue in its own right.
- 4.4 The RPS fails to acknowledge that a balance needs to be struck between competing issues, in this case the infrastructure policies against the other policies of the RPS. As an example, a number of high voltage transmission lines are likely to be located in "outstanding natural features and landscape areas": or in areas at high risk from natural hazards. Accordingly, the provisions relating to potential constraints should not unreasonably and/or unnecessarily restrict the maintenance and upgrading of existing lines. For example, new transmission lines should not be prevented from traversing an outstanding landscape where a detailed route selection process is used to determine the best overall route (in both environmental and development cost terms) and where it would result in less significant overall adverse effects. This needs to be recognised by regional and district councils, and the RPS should include some guidance or direction that such conflicts would be addressed on a case-by-case basis.
- 4.5 It is recommended that the Proposed RPS establish an appropriate and consistent planning framework to address the management of adverse environmental effects of the transmission network, including the upgrading and development of lines. In particular the RPS should include provisions that recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network and that recognise the route, site and method selection process.

#### **4.0 Relief Sought:**

- A. **Retain** the recognition of the benefits of infrastructure and the potential for infrastructure to be adversely affected by development in paragraph 1 of the Infrastructure subsection of Section 3.3.

- B. **Amend** paragraph 2 of the Infrastructure subsection of Section 3.3 to address the management of the effects of electricity transmission. This could be achieved by making amendments to the following effect (new text underlined):

*The National Policy Statement on Electricity Transmission (2008) sets out objectives and policies to enable the management of the effects on and of the electricity network under the Resource Management Act. The Statement recognises that efficient and secure electricity transmission plays a vital role in the well-being of New Zealand and makes it explicit that electricity transmission is to be considered a matter of national significance.*

- C. **Amend** the Infrastructure subsection of Section 3.3 to acknowledge the balance that needs to be struck between competing issues when implementing the RPS. This could be achieved by including an additional paragraph to the following effect:

*When implementing the RPS, a balance needs to be struck between competing issues, for example, the infrastructure policies and the other policies of the RPS. No one set of policies has priority over another set of policies and, as such, actual or potential conflicts need to be addressed on a case-by-case basis.*

- D. **Amend** the regionally significant resource management issues for infrastructure (Issue 2) in Section 3.3 to include a new issue: the management of the effects of electricity transmission. This could be achieved by making amendments to the following effect (new text underlined and deleted text in strikethrough; refer also para 5.3.2 of this submission):

*Infrastructure enables communities to provide for their social, economic and cultural wellbeing. Infrastructure can generate adverse effects. The degree to which these are acceptable will vary, including depending upon the regional (including national) significance of the infrastructure. The management, use and operation of infrastructure can be adversely affected when incompatible land uses occur under, ~~over, on or alongside~~ adjacent.*

- E. **Insert** a new Policy in the Proposed RPS to address the management of the effects of the National Grid. This could be achieved by introducing a new policy to the following effect:

***Policy X: Managing the Adverse Effects of the National Grid – Regional and District Plans***

*District and regional plans shall include policies and rules that also recognise and provide for a reasonable envelope of effects in which to facilitate the ongoing operation, maintenance and upgrading of the National Grid, and which ensure that when considering the environmental effects of new transmission assets, weight shall be given to the extent to which any adverse effects have been avoided, remedied or mitigated by appropriate site, route and method selection.*

***Explanation:***

*Electricity is vital for the health and safety of communities, as well as their economic sustainability. The National Policy Statement on Electricity Transmission 2008 recognises the national significance of the National Grid. Planning documents must adequately provide for the core strategic infrastructure that is required to support growth.*

*Activities associated with the operation, maintenance and upgrade of existing transmission lines, and the establishment of new lines inevitably generate adverse environmental effects on the environment. Typically, these effects include visual impacts, noise, earthworks, and perceived effects arising from electric and magnetic fields. Clearly these environmental effects need to be managed, however the focus needs to be on the overall management approach rather than each individual or component effect. Such an approach properly recognises the unique characteristics of the assets and takes into account the unique physical characteristics and operational requirements of the National Grid that need to be taken into account when managing its environmental effects, including that:*

- The network is an extensive, linear and connected system of lines and substations that traverses the full length of the country. The assets are of regional and national scale. Activities undertaken in any one part of the network can affect the remainder of the network;*
- The transmission assets are existing, dynamic working assets and need to operate within an envelope of accepted effects; and*
- The network has many operational and technical requirements that need to be recognised and that can impose constraints on the extent to which effects can be managed, and the extent to which alternative proposals can be put forward.*

*Furthermore, the existing transmission network is already established and is part of the existing environment. Accordingly, any residual environmental effects' of the network are also a part of the existing environment. There needs to be recognition and acceptance that the network exists, that its form will change over time, and that it needs to be able to continue to operate within an envelope of accepted effects.*

*When a new line is proposed, it is the careful route selection process that determines the best route in environmental and development cost terms. The route selection process is the best way to minimise and/or avoid, remedy or mitigate as appropriate, the potential adverse effects of new transmission lines. Full mitigation is not possible, because of the scale, extent and requirements of the linear network.*

## **5. Regulatory policies**

The management of regionally significant infrastructure is generally addressed through Policies 6, 7 and 38. While the policies are largely acceptable, some amendments and additions are sought.

### **5.1 Definition of regionally significant infrastructure**

5.1.1 Regionally significant infrastructure is defined in the 'Appendix 3: Definitions' of the RPS and is restated in full in the explanations to policies 6, 7 and 38.

5.1.2 Transpower supports the definition of regionally significant infrastructure insofar as it specifically includes National Grid infrastructure. However it is



not considered necessary to restate the definition in full in each of the policy explanations.

**5.1 Relief Sought:**

- A. Retain** the definition of regionally significant infrastructure as in Appendix 3: Definitions.
- B. Amend** Policy 6, Policy 7 and Policy 38 to remove the full definition of regionally significant infrastructure from the explanation text. If necessary, include an appropriate cross-reference to the definition.

**5.2 Policy 6**

5.2.1 Policy 6 is a regulatory policy to direct district and regional plans and the Wellington Regional Land Transport Strategy - it must be given effect to by regional, city or district plans and the Wellington RLTS must not be inconsistent with it. This policy is supported insofar as it is an inclusive policy that recognises the regional and wider benefits of people having access to energy so as to meet their needs, and requires district and regional council plans to include policy provisions to give effect to this.

5.2.2 However, Transpower recommends that Policy 6 be amended so that it does not restrict district and regional plans to only using policies to give effect to Policy 6. The use of methods, including rules, to give effect to the policy is equally valid. For example, district council's often require infrastructure and services provision to new subdivision using rules in the District Plan. In the Transpower context, this policy would often be given effect to by a district plan rule permitting maintenance and minor upgrading, including tree trimming.

**5.2 Relief Sought:**

- A. Retain** Policy 6 insofar as it is an inclusive policy that recognises the regional and wider benefits of people having access to energy so as to meet their needs, and requires district and regional council to include policy provisions to give effect to this.
- B. Amend** Policy 6 to include the use of methods, including rules, in addition to policies. This could be achieved by making amendments to the following effect (new text underlined):

***Policy 6: Recognising the benefits from regionally significant infrastructure and renewable energy – regional and district plans.***

*District and regional plans shall include policies and methods, including rules, that recognise:*

*(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure including:*

*(i) people can travel to, from and around the region efficiently;*

(ii) public health and safety is maintained through the provision of essential services, supply of potable water and the collection and transfer of sewage;  
(iii) people have access to 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.

### 5.3 Policy 7

5.3.1 Policy 7 is a regulatory policy to direct district and regional plans and the Wellington Regional Land Transport Strategy - it must be given effect to by regional, city or district plans and the Wellington RLTS must not be inconsistent with it. Policy 7 is generally supported by Transpower.

5.3.2 The term “alongside” should be deleted and replaced with the term “adjacent”. Adjacent is considered to be a more suitable term because its meaning has been clarified over time through case law. An amendment to the policy, explanation and the regionally significant resource management issue for Infrastructure (Section 3.3) is required.

5.3.3 The regionally significant resource management issue for Infrastructure (Section 3.3) includes the term ‘on’ in the second sentence:  
*The management, use and operation of infrastructure can be adversely affected when incompatible land uses occur under, over, on, or alongside.*

The subsequent policy provisions, including Policy 7, do not include the term ‘on’ and as such, for consistency, the term ‘on’ should be deleted from the issue. This amendment is addressed in 4C of this submission.

5.3.4 The explanation to Policy 7 needs to appropriately identify that regionally significant infrastructure needs to be protected from land uses and activities that not only adversely affect their efficient operation and ability to be maintained, but also that affect their upgrading and future development. This is consistent with the NPSET and is supported by the proposed amendment to the regionally significant resource management issue for Infrastructure (Section 3.3) to include upgrading and future development.

### 5.3 Relief Sought:

- A. **Amend** the regionally significant resource management issue for Infrastructure (Section 3.3) as outlined in section 4 of this submission.
- B. **Amend** Policy 7 to appropriately identify that regionally significant infrastructure needs to be protected from land uses and activities that not only adversely affect their efficient operation and ability to be maintained, but also that effect their ability to be upgraded. This could be achieved by making

amendments to the following effect (new text underlined and deleted text in strikethrough):

***Policy 7: Protecting regionally significant infrastructure – regional and district plans***

*District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new land uses or activities under, over, or ~~alongside~~ adjacent.*

***Explanation***

*...  
Incompatible land uses or activities are those which adversely affect the efficient operation of infrastructure and/or restrict its ability to be maintained and upgraded. It may also include new land uses that are sensitive to activities associated with infrastructure.*

*Protecting regionally significant infrastructure does not mean that all land uses or activities under, over, or ~~alongside~~ adjacent are prevented. The Wellington Regional Council and city and district councils will need to ensure that activities provided for in a district or regional plan are compatible with the efficient operation, and maintenance and upgrading of the infrastructure and any effects that may be associated with that infrastructure.*

## **5.4 Policy 38**

- 5.4.1 Policy 38 is a regulatory policy that needs to be given particular regard when assessing and deciding on resource consents, notices of requirement, or when changing, varying or replacing city, district or regional plans.
- 5.4.2 Policy 38(a) is generally supported, however it is unclear why it only relates to the benefits of regionally significant infrastructure and not to the broader range of issues that have been, or that need to be, identified when assessing and deciding on resource consents, notices of requirement, or when changing, varying or replacing city, district or regional plans, including the effects of and on regionally significant infrastructure.
- 5.4.3 The sunset clause in the explanation of Policy 38a is opposed. Policy 38 should continue to have effect once a district plan is in place to address, for example, situations where plans are changed or where, over time, the provisions in a plan are deemed to be inadequate over the passage of time but a plan change has not yet been initiated.

## **5.4 Relief Sought:**

- A.** **Amend** Policy 38 to address the broader range of issues that have been, or that need to be, identified. This could be achieved by making amendments to the following effect (new text underlined and deleted text in strikethrough):

***Policy 38: Recognising the benefits from regionally significant infrastructure and renewable energy – consideration***

*When considering an application for a resource consent, notice of requirement or a change, variation or replacement to a district or regional plan, particular regard shall be given to:*

*(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure and/or energy generated from renewable energy resources; and*

*(b) the protection of regionally significant infrastructure from incompatible new land uses or activities under, over or adjacent;*

*(c) the recognition and provision for a reasonable envelope of effects in which to facilitate the ongoing operation, maintenance and upgrading of the National Grid;*

*(d) the extent to which any adverse effects of new transmission activities have been avoided, remedied or mitigated by appropriate site, route and method selection; and*

*(e) the nationally significant wind and marine renewable energy resources within the region and the need for electricity generation facilities to locate where these resources exist.*

***Explanation***

*When considering the effects on and of regionally significant infrastructure, the benefits of regionally significant infrastructure must be taken into account.*

*The benefits of energy generated from renewable energy resources include:*

*...*

- B.** **Delete** the following text from the Explanation of Policy 38:  
*Policy 38(a) shall cease to have effect once policy 6 is given effect in a relevant district or regional plan.*

## **5.5 Policies Relating to Long Term Planning for the National Grid**

- 5.5.1 The RPS does not include a specific policy (or policies) relating to long term planning as is required by Policy 14 of the NPSET. Policy 14 of the NPSET states that:

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

- 5.5.2 To this effect Transpower seeks to ensure that the RPS contains relevant provisions to ensure future investment in transmission in areas to be specified by Transpower is not foreclosed by other activities, and to ensure that the RPS has adequate supportive policies for a future Transpower proposal for a notice of requirement.

- 5.5.3 Although Proposed Policy 57 relates to co-ordinating land use with the development and operation of infrastructure, this is traditionally worded as a sequencing and location policy for service infrastructure provision and therefore does not satisfy Policy 14. Additional provisions are required.

## 5.5 Relief Sought:

- A. **Insert** a specific regulatory policy (matters to be considered) and method responding to Policy 14 of the National Policy Statement for Electricity Transmission 2008. This could be achieved by including a policy and method drafted to have the following effect:

***Policy X: Accommodating Future Transmission Corridors***

*To accommodate a transmission route between new sources of electricity generation and the National Grid, and to take into account whether land use activities, including new or redeveloped urban areas, will prematurely foreclose or compromise options for accommodating future transmission corridors.*

***Explanation:***

*Security of energy supply is a key issue and existing and new transmission networks must have sufficient capacity to support growth both within and outside of the region. Ongoing investment in the transmission network, along with significant upgrading, is required in order to meet the demand for electricity and the Government's objective for a renewable energy future. For example, there will be grid connection requirements for new entry developments, including new sources of generation, in the region. Strategic planning to provide for transmission infrastructure is required.*

*Policy 14 of the NPSET states that:*

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

*Accordingly, it is important to recognise the national significance of the electricity transmission network and the need for ongoing investment in the transmission network, including the establishment of new transmission resources, if required, to meet the needs of present and future generations.*

***Method:***

Implement Policy X: Accommodating Future Transmission Corridors via Method 4 (as amended in accordance with the relief sought in 6.1 of this submission).

## 6. Methods to implement policies

### 6.1 Infrastructure methods

- 6.1.1 Objective 10 refers to the need to recognise and protect the social, economic, cultural and environmental benefits of regionally significant infrastructure. This is achieved through Policy 6 [Methods 1 and 2], Policy 7 [Methods 1 and 2] and Policy 38 [Method 4].
- 6.1.2 Transpower is concerned that Policies 6 and 7 are only intended to be given effect through Regional and District Plans (i.e. Methods 1 and 2) and not

through resource consents, notices of requirement, or when changing, varying or replacing city, district or regional plans.

- 6.1.3 Methods 1 and 2 identify that the process to amend district and regional plans to implement various policies (including Policy 6 and Policy 7) will commence on, or before, the date on which the relevant council commences the review of its district or regional plans. In the meantime, the Proposed RPS fails to give any guidance in respect of regionally significant infrastructure, except insofar as Council's are required to recognise its benefits in accordance with Policy 38(a). This is because Method 4 indicates that various policies, including Policy 38(a), will be given particular regard when considering a resource consent, notice of requirement, or when changing, varying or replacing a district or regional plan. Accordingly, Method 4 should be amended to address not only the benefits of regionally significant infrastructure, but also all of the other relevant issues as identified in this submission.
- 6.1.4 As stated in 5.4.3 of this submission the sunset clause for Policy 38a is opposed.
- 6.1.5 It is considered that an appropriate method to give effect to Policy 7 is to identify Transpower as an affected party to resource consent, designation or plan amendment processes. Transpower works on a continuous basis to ensure that new development proposals near high voltage transmission lines maintain appropriate separation distances, and that adequate physical access to the lines is maintained for emergency and maintenance works. Identifying Transpower as an affected party for land use and development proposals located near high voltage transmission lines would help to ensure that all potential issues are identified and appropriately addressed at pre-development stage. A new method is required to achieve this.

**6.1 Relief Sought:**

- A.** **Amend** Methods 1 and 2 to insert reference to policy 4 and to new Policy X Accommodating Future Transmission Corridors.
- B.** **Amend** Method 4 to insert reference to policies 6 and 7 and to new Policy X Accommodating Future Transmission Corridors.
- C.** **Amend** Methods 1, 2 and 4 to identify Transpower as an affected party where new land uses are proposed under, over or adjacent existing or known future National Grid infrastructure corridors by inserting the following text to Methods 1, 2 and 4:  
For policies 6, 7, 38 and X [Accommodating Future Transmission Corridors], Transpower New Zealand Limited should be identified as an affected party for land use and development proposals located under, over, or adjacent existing or future high voltage transmission lines.

## **6.2 Application of policies to Tararua District Council**

- 6.2.1 Under Method 1, Policies 6, 7, and 10 (and a range of other policies with the exception of policies 22 and 23 relating to regionally significant biodiversity) do not apply to the Tararua District Council. There is no explanation for this in the Proposed RPS. The policies should all apply to land within the Wellington Region unless there is a statutory arrangement for the provisions of the HorizonsMW Regional Council to apply. Transpower recommends that either an explanation to that effect should be included in the RPS or the policies should apply to all Council's having land within the Regional Council's jurisdiction.

### **6.2 Relief Sought:**

- A. Amend** Method 1 to either include an explanation as to why the stated policies should not apply to the Tararua District Council **or** apply the stated policies to the Tararua District Council.

## **6.3 Methods 18 and 35**

- 6.3.1 Method 18 instructs the Council, in conjunction with the city and district council's, to prepare a structure planning guide about integrating land use with infrastructure and for delivering high quality urban design. Transpower supports Method 18 and would welcome the opportunity to be involved in the development of such a guide.
- 6.3.2 Method 35 records the Council's support for industry-led Codes of Practice and is supported by Transpower.

### **6.3 Relief Sought:**

- A. Retain** Method 18.
- B. Retain** Method 35 insofar as it records the Council's support for industry-led Codes of Practice.

## **7. Coastal Environment – Section 3.2**

### **7.1 Introduction**

- 7.1.1 Transpower supports the recognition of significant infrastructure, including the Cook Strait cable, being located in the coastal environment and its essential role to the community's economic and social wellbeing. It is recommended that 'significant infrastructure' includes specific recognition of transmission facilities in a more general sense.

- 7.1.2 The relationship of the NZCPS to the management of the coastal environment is acknowledged, however there is no acknowledgement of other national policy statements that may be relevant to the consideration of activities within the coastal environment.

**7.1 Relief Sought:**

- A. Retain** recognition of significant infrastructure, such as Centreport and the Cook Strait cable.
- B. Amend** the Introduction to include specific recognition of transmission facilities. This could be achieved by amending paragraph 3 to the following effect (new text underlined):  
*Significant infrastructure – such as Centreport, the Cook Strait Cable and other transmission infrastructure, and several state highways and rail corridors – is located within the coastal environment.*
- C. Amend** the Introduction by adding a final sentence in paragraph 4 to the following effect:  
*Other National Policy Statements are also relevant (refer to Section 1.3).*

**7.2 Objectives**

- 7.2.1 Objective 3 refers to the protection of habitats and features in the coastal environment. Transpower recommends that Objective 3 is amended to refer to the protection of habitats and features from 'inappropriate' use and development or from adverse effects, rather than to the need to protect such areas per se.
- 7.2.2 Objective 4 appropriately refers to the protection of the natural character of the coast from the adverse effects of inappropriate use and development. Transpower supports Objective 4.

**7.2 Relief Sought:**

- A. Amend** Objective 3 to include reference to the protection of the values of habitats and features from inappropriate use and development. This could be achieved by making amendments to the following effect (new text underlined):  
*Habitats and features in the coastal environment are protected from inappropriate use and development because of their significant indigenous biodiversity, recreational, cultural, historical, or landscape values.*
- B. Retain** Objective 4 without modification.



## 8. Historic heritage – Section 3.5

- 8.1 Objective 15 (Heritage) refers to inappropriate modification, use and development. Transpower supports Objective 15.

### 8.0 Relief Sought:

- 8.1 **Retain** Objective 15 without modification.

## 9. Landscape – Section 3.7

- 9.1 Objective 17 (Landscape) refers to the identification, protection or enhancement of the *values* of the region's outstanding natural features, landscapes and significant amenity landscapes. Transpower supports the reference to the protection of the values of such areas as opposed to the areas per se.

- 9.2 It is unclear what is meant by the reference to 'landscapes and significant amenity landscapes'. If the reference is to outstanding landscapes (ie: as given effect through Policies 24 and 25) then this should be clarified and is supported. If, however, the reference is to landscapes generally then it is considered that the reference should be removed from the RPS. It is not the regional council's function to identify, protect and enhance landscapes in a general sense.

- 9.3 Policies 26 and 27 refer to 'significant amenity landscapes'. The policy criteria for significant amenity landscapes (policy 26) are the same as the policy criteria for determining outstanding natural landscapes and features (policy 24). This is inappropriate. Furthermore, it is not the regional council's function to identify, protect and enhance landscapes in a general sense. It is recommended that Policies 26 and 27 be deleted and Policy 49 consequentially amended.

### 9.0 Relief Sought:

- A. **Retain** the reference in Objective 17 to the identification, protection or enhancement of the *values* of the region's outstanding natural features and landscapes.
- B. **Delete** from Objective 17, the reference to 'landscapes and significant amenity landscapes'.
- C. **Delete** Policies 26 and 27.
- D. **Amend** Policy 49 accordingly.

## 10. Natural Hazards – Section 3.8

- 10.1 The focus of the natural hazards section should be on addressing risk rather than avoiding development per se.
- 10.2 Insofar as Objectives 18 and 19 are risk focused rather than activity focussed, they are supported. It is recommended that Policy 28 be redrafted so as to clarify that it is not the natural hazards areas per se that subdivision and development needs to avoid, but rather that generating unacceptable risk needs to be avoided. Anticipated Environmental Result 18 will need to be consequentially amended.

### 10. Relief Sought:

- A. **Retain** the focus on risk (as opposed to activities) in Objectives 18 and 19.
- B. **Amend** Policy 28 by making amendments to the following effect (new text underlined, deleted text in strikethrough):

#### **Policy 28 ...**

*District plans shall :*

- (a) *identify areas at high risk from natural hazards ; and*  
(b) *include policies and rules to avoid subdivision and development in those areas, if such activities would increase the associated risk.*

- C. **Amend** the AER for Policy 18 by making amendments to the following effect (new text underlined, deleted text in strikethrough):  
(b) *contain policies and rules to avoid subdivision and development in those areas, if such activities would increase the associated risk.*  
~~There is no~~ No new subdivision and development increases the risk in areas at high risk from natural hazards.

## 11. Regional Form, Design and Function – Section 3.9

- 11.1 Transpower recommends that Objective 21 be amended to recognise that regional form may be affected by existing infrastructure.

### 11.0 Relief Sought:

- A. **Amend** Objective 21 to recognise that regional form may be affected by existing infrastructure. This could be achieved by making amendments to the following effect (new text underlined, deleted text in strikethrough):

*A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and:*

...

- (j) *efficient ~~of~~ use and development of existing infrastructure*

## 12. Anticipated Environmental Results (AER)

- 12.1 The AER associated with Objective 10 is simply a restatement of the method and the objective and policies. It needs to be revised to reflect the environmental outcomes envisaged, including having regard to the outcomes that will be achieved by giving effect to other parts of this submission.

### 12.0 Relief Sought:

- A. **Delete** the AER associated with Objective 10.
- B. **Insert** environmental outcomes that will be achieved by giving effect to Policies 6, 7 and 38 and to the amendments sought through this submission. This could be achieved by making amendments to the following effect:

- The adverse effects of the ongoing operation, maintenance, upgrading and development of existing infrastructure are avoided, remedied or mitigated to the extent practicable.
- Risks to the health and safety of the community are minimised.
- Ongoing protection and provision of regionally significant infrastructure.
- Facilitate the security of electricity supply.
- A consistent cross-boundary jurisdictional approach is adopted to addressing the adverse effects of and on lineal infrastructure corridors.

## 13. Additional matters

- 13.1 Transpower looks forward to further engaging with Wellington Regional Council to discuss the matters raised in this submission, including the integration of the NPSET into the RPS.

### 13.0 Relief Sought:

- A. **Make** any additions, deletions or consequential amendments necessary as a result of the matters raised in these submissions.
- B. **Adopt** any other such relief as to give effect to this submission.

**C. TRANSPOWER WISHES TO BE HEARD IN SUPPORT OF THIS SUBMISSION.**

**D. IF OTHERS MAKE A SIMILAR SUBMISSION, TRANSPOWER WOULD NOT BE PREPARED TO CONSIDER PRESENTING A JOINT CASE AT ANY HEARING.**

