(5)

IN THE MATTER

Of the Resource Management Act 1991

AND

IN THE MATTER

Of Proposed Plan Change 13

to the Mackenzie District Plan

STATEMENT OF EVIDENCE OF

KAREN TRACY BLAIR

Dated for 2 September 2008

1.0 INTRODUCTION

1. My name is Karen Tracy Blair. I am a director of and planning consultant with Burton Planning Consultants Limited. I hold a Bachelor of Planning degree from Auckland University. I have practiced resource management as a consultant or in central and local government for over 15 years. This has mainly been with Burton Consultants but also includes 3 years with Waitakere City Council and 2 years with the Ministry for the Environment.

2. My experience covers a wide variety of planning issues, both at a policy and implementation level. I have been involved in Plan Changes and applications for resource consents.

3. I appear today as a witness for Transpower New Zealand Limited. Transpower is the State Owned Enterprise that owns and operates the network of transmission lines[1], substations, switchyards and a control centre linked via a telecommunications network, collectively known as the National Grid. It is the National Grid that connects the power stations, which generate electricity to power companies, which in turn supply domestic users. I have included, as Appendix A, a list and map of Transpower's assets within the Mackenzie Basin. The Twizel substation is located within the Mackenzie Basin Subzone that is to be introduced by Plan Change 13, and nine different Transpower's lines traverse the Subzone.

4. Transpower is required to operate and maintain the National Grid and, where necessary, to upgrade the existing facilities to meet demand. The National Grid in the Canterbury region is all above ground and predominantly on towers. Span distances are typically 250-500 metres, although depending on topography can be longer or shorter. Tower heights are between 25-45m for 110kV and 35-55m for 220kV, although the height of any one particular tower can vary depending upon the topography and the need to maintain safe statutory separation distances. The National Grid is predominantly located over private land rather than along roads.

[1] The term transmission line refers to the conductors and associated support structures.

2.0 PLAN CHANGE 13 AND TRANSPOWER'S SUBMISSION

5. The primary purpose of Plan Change 13 ("the Plan Change") is to provide greater protection of the landscape values of the Mackenzie Basin from inappropriate subdivision, development and use.

6. Transpower's submission seeks amendments to the Plan Change to:

- Recognise the presence of nationally significant utilities as a component of rural landscape values;
- Recognise the need to weigh the protection of natural resources against the appropriate development of physical resources in order to achieve sustainable ~~development~~ management;
- Clarify that references to "protection" relate to protection from inappropriate development as opposed to development per se;
- Recognise that the landscape values of the Basin result from physical as well as cultural and natural factors; and
- Recognise that the existing infrastructure will need to be operated, maintained and upgraded and that new infrastructure may need to be established in the future.

7. I generally concur with the intent of Transpower's submission.

3.0 THE RMA FRAMEWORK

8. The RMA promotes the sustainable management of natural and physical resources[2]. The National Grid is a significant physical resource, the efficient use and development of which needs to be considered[3]. The facilitation of integrated management of the effects of the use, development or protection of land and associated natural and physical resources is a function of district councils'[4].

[2] Resource Management Act 1991, Part II, Section 5
[3] Resource Management Act 1991, Part II, Section 7
[4] Resource Management Act 1991, Part IV, Section 31 (1) (a)

9. Since the Plan Change was notified, a National Policy Statement on Electricity Transmission 2008 (NPSET) has come into force.[5] A copy of the NPSET is attached to my evidence as Appendix B. The NPSET sets out objectives and policies to enable the management of the effects of and on the electricity transmission network under the RMA.

10. The 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.*

11. The NPSET contains 14 policies. Of particular relevance to this Plan Change, policy 1 recognises the national benefits of transmission, while policies 2 – 9 guide the management of the environmental effects of transmission. In my opinion, these policies set out a general set of responsibilities on both decision makers and Transpower, as follows:

Responsibilities on Decision Makers:

- Existing assets should be able to be reasonably operated, maintained, upgraded and developed (policy 2 and 5);
- Technical and operational constraints of the network should be recognised (policy 3);
- For new transmission or major upgrades, consideration should be given as to how route, site and method selection have avoided, remedied or mitigated adverse effects (policy 4).

Responsibilities on Transpower:

- In urban environments, adverse effects on urban amenity should be minimised (i.e. reduced to the extent possible), and adverse effects on

[5] Issued by notice in the Gazette on 13 March 2008 and came into force on 28 April 2008.

town centres and on areas of high recreational value or amenity and existing sensitive areas should be avoided (policy 7);

- In rural environments, adverse effects on outstanding natural landscapes, on areas of high natural character and areas of high recreation value and ~~on~~ amenity and existing sensitive activities should seek to be avoided (i.e. avoided where possible) (policy 8);
- For major upgrades, where possible existing adverse effects on sensitive activities should be reduced (policy 6);

12. Having regard to those responsibilities, the NPSET, in my opinion:
    - Confirms that the national significance of transmission infrastructure needs to be recognised, and that its benefits need to be considered when assessing any local adverse effects;
    - Recognises that transmission lines are dynamic corridors that need to be protected, including from 'third party' activities, to ensure that they can be operated, maintained and upgraded in a generally unfettered manner to meet ongoing demand;
    - Recognises that not all adverse effects from transmission infrastructure can be avoided, remedied or mitigated; and
    - Recognises that where there is a need for new lines they should be located to avoid, where possible, scheduled sensitive areas. But further to this, that these areas (scheduled sensitive areas) are not inviolable and that the best opportunity to mitigate adverse effects is often through a robust route selection process.

13. In accordance with ~~Policy~~ Section 55(2A)(a) of the RMA, and within four years of approval of an NPS, local authorities are required to notify and process a plan change or review, to give effect as appropriate to the provisions of the NPS. The Plan Change was notified prior to the NPSET coming into force, however the preamble to the NPSET makes it clear that decision makers are to be guided by it when drafting plan rules and that it should be taken into account during the hearing and decision making process. In any case, and in my view, Transpower's submissions to the Plan Change seek outcomes that are consistent with the policy directions contained in the NPSET.

14. I also note that MfE is also currently developing a National Environmental Standard for Electrical Transmission (NESET). This will ultimately proscribe an envelope of acceptable effects arising from the transmission of electricity to be included in regional and district plans (likely to be released as Part 1 of the NESET) and measures necessary to control adverse effects *on* transmission infrastructure – often referred to as "reverse sensitivity" or "third party" effects (likely to be released as Part 2 of the NESET).

4.0 DISCUSSION

15. Transpower's submission raises a concern that the Plan Change does not recognise the existing transmission infrastructure that traverses the Mackenzie Basin. The submission notes that it is inappropriate for areas containing existing infrastructure to be described as outstanding or significant without recognising the presence of that infrastructure. Accordingly, the submission expresses concern that the Plan Change does not appropriately address the relationship between landscape values and the National Grid.

16. I generally concur with Transpower's submission. In my experience, when outstanding landscape areas are being identified there is a tendency to overlook, or be highly tolerant of, the presence of transmission lines. However once that classification is in place, such provisions are argued to be extremely protective and to effectively impose significant constraints on both existing and future development. It is therefore critical, in my view, that a landscape assessment considers the physical elements of a landscape alongside the natural and cultural elements, and that the policy approach is appropriately reflective of those physical elements.

17. As stated previously, Transpower has one substation within, and nine lines traversing, the Mackenzie Basin Subzone. Clearly its categorisation as an Outstanding Natural Landscape was applied with the existing lines in situ, and the presence of such lines has had very little effect on the classification of this area as outstanding. This fact is not, in my opinion, well reflected in the proposed policy approach which in turn, translates into policy provisions that inappropriately and unnecessarily constrain the operation, management and development of that infrastructure.

18. The ongoing and increasing demand for electricity needs to be met. The existing transmission corridors represent a significant investment and it makes sense, in both efficiency and environmental terms, to maximise the use of these existing corridors as far as practicable. There is an envelope of effects associated with an existing corridor and with its ongoing operation, maintenance and upgrading that need to be recognised. These may not be readily apparent to those identifying landscapes in a "holistic" way or to those developing frameworks for protecting such landscapes areas, especially where the basis for that protection is solely derived from the values associated with the natural resources.

19. Using existing corridors requires that there be stepwise improvements to various transmission lines to allow them to safely transport more power over time. These stepwise improvements can include a range of activities, for example, the installation of additional conductors (e.g. duplexing) or replacing conductors with a greater capacity, resagging of lines, installation of earthwires for lightning protection, changes to crossarms and insulators, changes in substation settings, or changes in the voltage of a line. Some of these changes are more visible than others. In terms of maintenance there are a range of effects associated with activities such as tower painting, structural repairs and associated earthworks, and the management of vegetation in close proximity to maintain clearance distances[6]. The effects associated with these activities can generally be absorbed against the backdrop of the existing infrastructure and are confined in their location.

20. The key principle is that these facilities have to be recognised as part of an existing but dynamic network, requiring changes over time in order to meet transmission demand. They are not static structures; rather they are functionally dynamic and have to cater for increasing energy flows over time.

21. With regard to new lines, the identification of outstanding landscape areas can, in fact, greatly assist in identifying appropriate route options. This is important because, as is recognised in the NPSET, when a new line is proposed, it is the careful and robust route selection process that determines the best route in environmental and development cost terms. That route

[6] As specified in the Electricity (Hazards from Trees) Regulations 2003

selection process is the key means by which the potentially significant adverse effects of transmission lines can be addressed. Even so, because of the scale of the linear network there can still be considerable difficulty in avoiding such areas. In some cases, for example, it may be more appropriate for new transmission lines to traverse parts of significant landscapes, where this would result in less significant adverse effects overall.

22. Current intensification, urbanisation and population growth are placing increasing demand on energy resources, and in particular on electricity transmission. I expect that demand on this infrastructure will continue to intensify, including as alternative generation options (which require a demand for new or strengthened transmission in order to provide additional capacity or a Grid connection) are developed. Considerable investment in the National Grid is required to help address capacity issues. This will involve upgrades of existing lines as well as new line proposals.

23. Transpower must operate, maintain and upgrade its existing lines within the Outstanding Landscape Area of the Mackenzie Basin. It will simply not be possible to avoid such works in this area. Furthermore, there may be a need to carry out major upgrades and/or establish a new line or lines within this area. For new lines, Transpower will need to establish the "best overall" environmental route. The policy framework as amended by the Plan Change needs to recognise and address these requirements.

5.0 THE COUNCIL'S PLANNING REPORT

5.1 Recognition of Transmission Infrastructure

24. One of the critical elements of the Plan Change that Transpower's submission opposes is the lack of recognition in the landscape assessment, and the consequent policy approach, of the electricity infrastructure that traverses the Basin.

25. The Planning Report recommends accepting, or accepting in part, a number of Transpower's submissions on this topic. Where this is the case, and where I endorse the specific changes proposed by the Planner, I have simply listed these below. I have also included, in Appendix C – Part 1, a record of the

recommendations that are endorsed. I commend the following recommended amendments to the Committee:

(a) Amend Issue 7 to recognise the presence of established activities of national importance and which could be seen to impact on the values of the Basin over time (Submission 91/1 - refer to Section 3, page 7 of the Planner's Report);

(b) Amend Objective 3A to refer to 'inappropriate' development, thereby recognising that some forms of development may be appropriate in the varying contexts that arise over time, and to retain the word "sustain" which recognises change and encourages positive outcomes, alongside the word "protect" (Submission 91/2 - Section 4, page 8);

(c) Amend the 'Explanation and Reasons' for Policy 3A to acknowledge that physical factors such as transmission lines contribute to the landscape values of the Basin, by specifically acknowledging "built structures" as a component of "cultural factors" (Submissions 91/3 and 91/5 - Section 5, page 10);

(d) Retain Policy 3B and its explanation without modification (Submission 91/6 - Section 6, page 11);

(e) Amend Policy 3F to refer to residential development and subdivision as opposed to development per se (Submission 91/9 - Section 10, page 18);

(f) Retain point 11 in Policy 3G (Submission 91/10 - Section 11, page 21).

26. The Planner's Report recommends declining Transpower's submissions 91/16 and 91/17, which seek changes to Objective 3B. The changes sought to clarify that protection, in the policy context of 3B, means protection from inappropriate subdivision, use and development rather than protection from subdivision, use and development per se. These submissions are addressed at Section 20 of the Planner's Report (Page 35). In recommending that the submissions be declined, the Planner states that the proposed changes:

... would make Objective 3A and 3B very similar. I do not consider this is appropriate because this Objective is based on addressing section 7 rather than section 6 matters. I am also reluctant to consider any amendments to an Objective that has been in the Plan for some times (sic) and which relates to areas beyond the Mackenzie Basin, which is the focus of the Plan Change.

27. I understand and can accept the view of the Planner, and hence I am not suggesting that any changes should be made to Objective 3B. However I do consider that a further change is required to the fourth bullet point of the proposed amendments to the Landscape Values Explanation. That provision outlines what the assessment of landscapes shall be based on and refers to an exclusive list that does not specifically include the built environment. As proposed for amendment, it reads as follows (proposed amendments underlined);

"Assessment of landscapes shall be based on the following characteristics: natural science values, aesthetic values (including memorability and naturalness), shared and recognised values and takata whenua values, legibility values, transient values, natural character, and historic associations."

28. In my view a balanced landscape assessment should include an assessment of physical (including built) characteristics. In relation to other submissions of Transpower, both the Planner and Mr Densem (the Reporting Landscape Architect) acknowledge that the built environment has a place in landscape assessments, and changes were recommended to include specific reference to the built environment as part of the cultural values of the Basin. I am not concerned either way if the explanation is amended to include a reference directly to the physical and/or built landscape components, or to cultural components (as long as it is clear that the built environment forms part of that). My view is that the provision should be amended along the following lines, or to similar effect (my additions underlined and deletions in strikethrough):

"Assessment of landscapes shall be based on the following characteristics: natural science values, aesthetic values (including memorability and naturalness), shared and recognised values and takata whenua values, legibility values, transient values, natural character, ~~and~~ historic associations, and cultural components (including the built environment)."

5.2 Classification of the Area

29. Transpower's submission opposed the uncertainty regarding the extent of the Outstanding Natural Area classification. To this end, and as discussed earlier, such information is important because it is a major consideration when

planning, in particular, new lines. At present the entire Mackenzie Basin is included in the Mackenzie Basin Subzone. While it is appropriate to recognise that the Basin has particular landscape values that separate it from the rest of the Mackenzie District, it is equally appropriate to clearly identify those parts of the Basin that are 'outstanding', or conversely that are not outstanding.

30. To this end, the third bullet point in the Explanation and Reasons to Policy 3A acknowledges that not all of the areas within the Mackenzie Basin are outstanding, It states that:

"Not all areas within the Mackenzie basin are outstanding. However for the purposes of the District Plan objectives and policies relating to outstanding natural landscapes, reference to the Mackenzie Basin is used to refer to those parts of the Basin that are outstanding".

31. In my opinion this is somewhat confusing because it refers to only parts of the Basin as being outstanding. It will be difficult to gauge which policies are applicable to a particular proposal unless the *outstanding* landscapes are specifically identified (eg: mapped).

32. The Planner's Report addresses this matter in Section 36.4 (at page 68) as follows:

In all situations, other than in the hinterland of Twizel, it is expected that all areas are part of an outstanding natural landscape or feature and so no change is really required. Due to the Council not being in a position to finalise extensions of urban zoning around Twizel there is currently an overlap between Twizel and Rural area. The Council propose, once they have finalised the background work on the urban extensions and any rural residential zones around Twizel, to notify a plan change bringing in those zonings and at the same time notify a variation to Plan Change 13 removing those new areas from the Mackenzie Basin Subzone. This will provide an opportunity to revise any statements about the extent of the outstanding natural landscapes and features of the Basin.

33. I believe that there is still an inconsistency in the Plan Change that needs to be resolved. The first part of the above explanation says that all areas of the Basin are part of an outstanding natural landscape or feature, which is contrary to what is stated in the Explanation and Reasons to Policy 3A (point

4). I am quite happy to be guided by landscape experts on the matter of what parts of the Basin are outstanding. However from a planning perspective, if all of the areas within the Basin are outstanding, then the explanation to Policy 3A needs to be amended to recognise this. In the alternate, a policy overlay map needs to be included to identify which parts of the Subzone are outstanding (or not). If the Council's intention is only to exclude the possible future urban areas around Twizel from the outstanding landscape classification, then I consider that the explanation to Policy 3A should be amended to recognise that, for the present time at least, those areas are included as outstanding landscapes. I have included a recommendation to this effect in Part 2 of Appendix C. It reads as follows:

> *Amend the explanation to Policy 3A (bullet point 3) to either recognise that all the land within the Mackenzie Basin Subzone is outstanding or alternatively, include a policy overlay identifying which parts of the Subzone are outstanding.*

5.3 Providing for the Protection and Development of Infrastructure

34. Transpower's submission seeks to ensure that the Plan Change recognises that existing infrastructure is vulnerable to the adverse effects of future development within the Basin, and also to ensure that its provisions do not unnecessarily or inappropriately restrict the development of infrastructure.

35. The Planning Report recommends accepting, or accepting in part, a number of Transpower's submissions on this topic. Again, where this is the case, and where I endorse the specific changes proposed by the Planner, I have simply listed these below. I have also included, in Appendix C – Part 1, a record of the recommendations that are endorsed. I commend the following recommended amendments to the Committee:

- Amend the Explanation and Reasons for Policy 3C to include impacts on existing infrastructure and assets to the list of potential adverse effects (Submission 91/7 - refer to Section 7, page 12 of the Planner's Report);
- Retain the earthworks exemptions to Rural Rule 4.2.2 and Rural Residential – Manuka Terrace Rule 4.2 (Submissions 91/18 and 91/19 – refer to Sections 24 and 26.3, page 44 and 50);

- Retain the exemption in the subdivision rules for utilities to comply with minimum lot sizes (Submission 91/20 – refer to Section 27.3, page 54); and
- Combine Policies 3I and 3J and include a reference to infrastructure outside approved building nodes (submissions 91/11 and 91/12 – refer to Section 13, page 26).

36. The Planner's Report recommends declining Transpower's submissions 91/13, 91/14 and 91/15. Those submissions seek changes to the Explanation and Reasons of Policies 3K and 3N.

37. Transpower's submission on Policy 3K sought to recognise that all adverse effects of nationally significant infrastructure could not be avoided, remedied or mitigated and, in particular, to recognise the need to provide for maintenance and further development of nationally significant infrastructure in the vicinity of Lakes Tekapo, Pukaki and Ohau.

38. Transpower's submission on Policy 3N seeks to have its buildings and structures acknowledged as being different from residential buildings because, in order to meet their functional requirements, they have less flexibility in design and external appearance.

39. While the Planner recommends declining Transpower's submissions, she has recommended changes to both Policy 3K and Policy 3N as a result of submissions by Meridian (71/26 and 27 on page 28 of the Report and 71/32 on page 31 of the Report). Transpower lodged further submissions in support of all three of those particular submissions by Meridian. I endorse the changes recommended by the Planner and, subject to them being made, accept the recommendation to decline Transpower's submissions 91/13, 91/14 and 91/15.

6.0 FURTHER SUBMISSIONS

40. Canterbury Regional Council (CRC) opposed many of Transpower's submission points (91/1, 3, 5, 9, 11, 12, 13, 14, 15 and 17). In brief, CRC submitted that providing for "nationally significant infrastructure" and new utilities fails to acknowledge the effects, or potential effects, of these activities

on outstanding natural features and landscapes and seeks to elevate such infrastructure above the status afforded by the RMA. The submission also makes reference to the proposed National Environmental Standards, although not to the NPSET which was, at the time of further submissions, in effect. The further submission implies that Transpower's submission was, somehow, seeking to circumvent the resource consent process for the construction of new lines and infrastructure.

41. With respect, I do not view Transpower's submission in this way. The NPSET has specifically identified the National Grid as significant infrastructure. Furthermore, the NPSET gives clear direction as to how policy and associated provisions in plans (in this case) should be developed. Indeed CRC itself, through the provisions of proposed Plan Change 1 to the RPS[7], has sought to recognise and protect the activities of regionally significant infrastructure and facilities.

42. In my opinion, Transpower's submission is consistent with the provisions of the NPSET and the RMA generally. It seeks to ensure that the characteristics and values which contribute to making the Mackenzie Basin landscape outstanding are identified and that the specific plan provisions can usefully and appropriately guide development or change in a way and at a level that sustains these resources and values.

43. As far as I am concerned, it is an undisputed fact that, until the NESET comes into effect, Transpower is required to comply with the regulatory provisions in Section 15 of the District Plan (Utilities). In that regard, any transmission activities that require consent will be subject to assessment against the objectives and policies of the Plan. It is therefore most important, in my opinion, that such provisions give appropriate and clear guidance regarding the management of the Mackenzie Basin.

7.0 CONCLUSION

44. Transpower's submission challenges the Plan Change on two critical grounds:

[7] Staff Report issued, but hearings deferred.

a. The lack of recognition in the landscape assessment, and in the consequential policy and regulatory approach, of the electricity infrastructure that traverses the Basin, despite the presence of nationally significant electricity generation and transmission infrastructure within, in particular, the outstanding natural landscape areas of Pukaki, Tekapo and Ohau; and
b. The lack of specific detail regarding, or specific mapping of, the outstanding landscape areas.

45. It is my opinion that the various changes as set out in Appendix C, Parts 1 and 2, to my evidence will address the concerns raised in Transpower's submission and are consistent with the NPSET and with the broad purpose of the RMA. For the reasons identified herein, I commend these to the Committee.

Karen Blair
For Hearing: 2 September 2008.

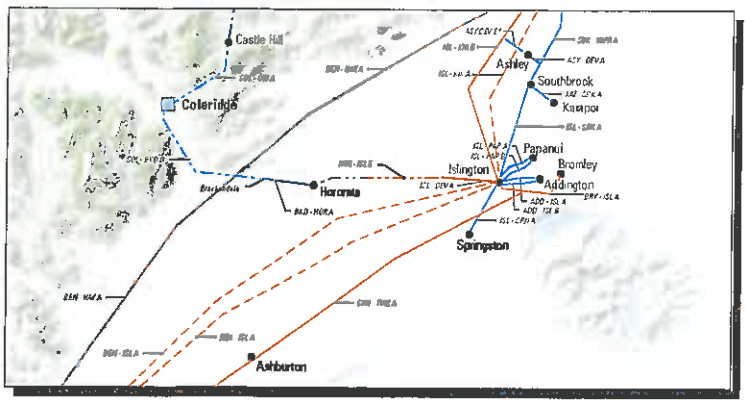
APPENDIX A –
MAP AND LIST OF TRANSPOWER INFRASTRUCTURE WITHIN THE MACKENZIE BASIN AREA

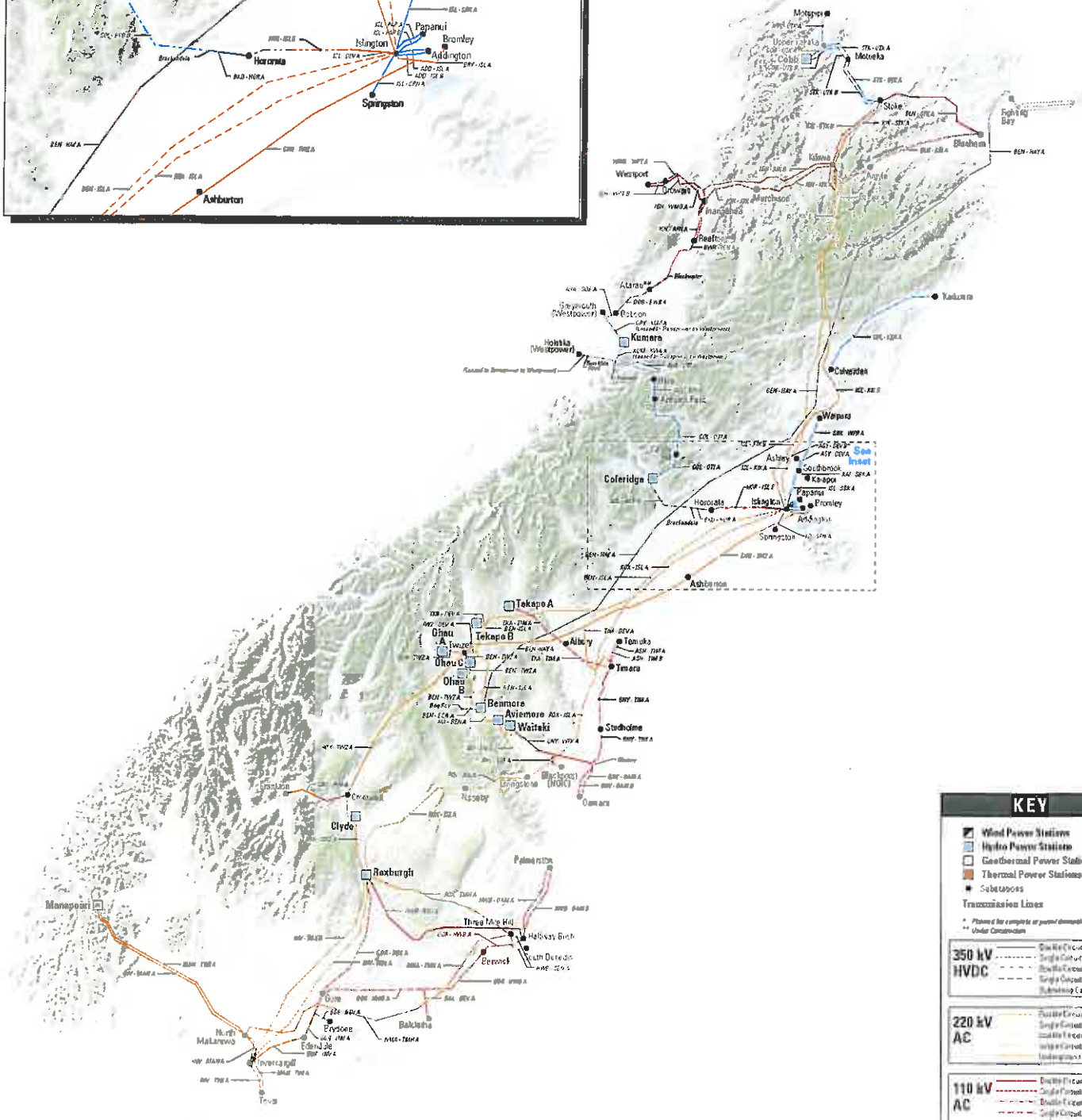
The MacKenzie District is traversed by the following high voltage transmission lines and contains the following substation (see map over):

- Benmore – Haywards 350 HVDC double circuit transmission line on towers;
- Ohau – Twizel A 220 kV double circuit transmission line on towers;
- Twizel Deviation A 220 kV double circuit transmission line on towers;
- Christchurch – Twizel A 220 kV double circuit transmission line on towers;
- Tekapo B - Deviation A 220 kV double circuit transmission line on towers;
- Tekapo A – Timaru A 110 kV single circuit transmission line on poles;
- Benmore – Islington A 220 kV single circuit transmission line on towers;
- Benmore – Twizel A 220 kV double circuit transmission line on towers;
- Roxburgh - Twizel A 220 kV double circuit transmission line on towers;
- Twizel Substation.

TRANSPOWER

TRANSPOWER TRANSMISSION NETWORK : SOUTH ISLAND





KEY

- Wind Power Stations
- Hydro Power Stations
- Geothermal Power Stations
- Thermal Power Stations
- Substations

Transmission Lines

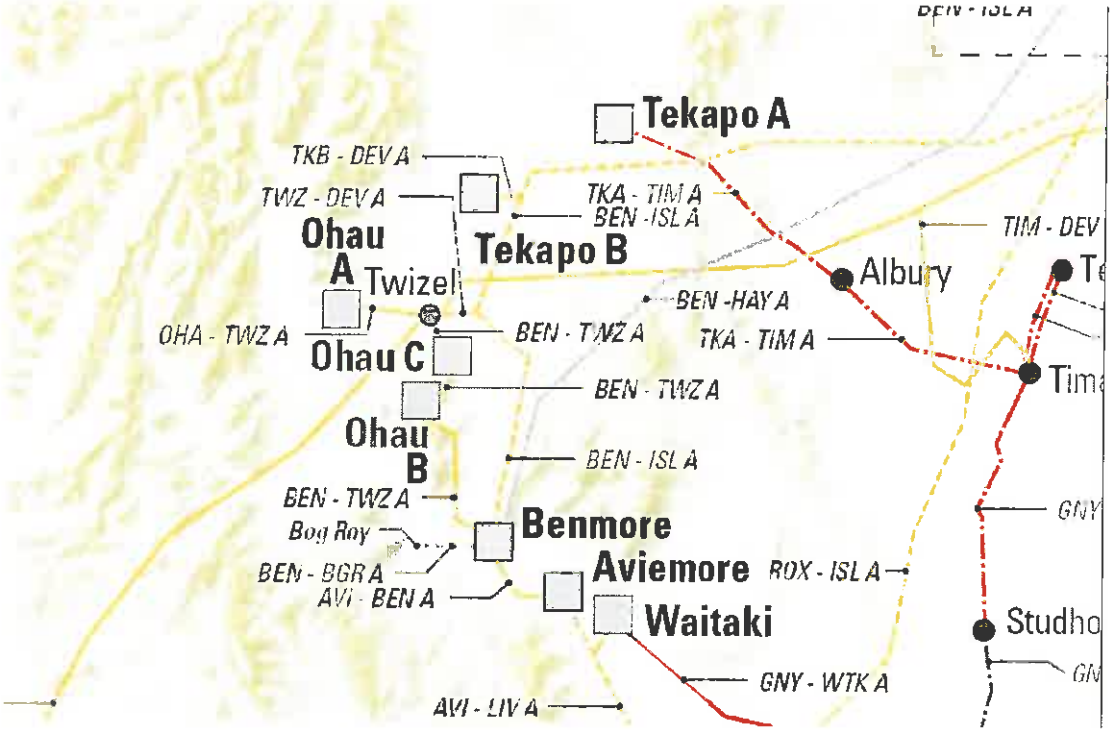
* Planned for completion or granted consenting
** Under Construction

350 kV HVDC	Double Circuit Towers; Single Circuit Towers; Double Circuit Poles; Single Circuit Poles; Submarine Cable
220 kV AC	Double Circuit Towers; Single Circuit Towers; Double Circuit Poles; Single Circuit Poles; Underground Cable
110 kV AC	Double Circuit Towers; Single Circuit Towers; Double Circuit Poles; Single Circuit Poles; Underground Cable
50/66 kV AC	Double Circuit Towers; Single Circuit Towers; Double Circuit Poles; Single Circuit Poles; Underground Cable

Note: The nominal operating voltage may be less

This map is an indicative representation of the Transpower Network

Transmission Network as at July 2006
Produced by IT Production Services



KEY

- Wind Power Stations
- Hydro Power Stations
- Geothermal Power Stations
- Thermal Power Stations
- Substations

Transmission Lines

* Planned for complete or partial dismantling
** Under Construction

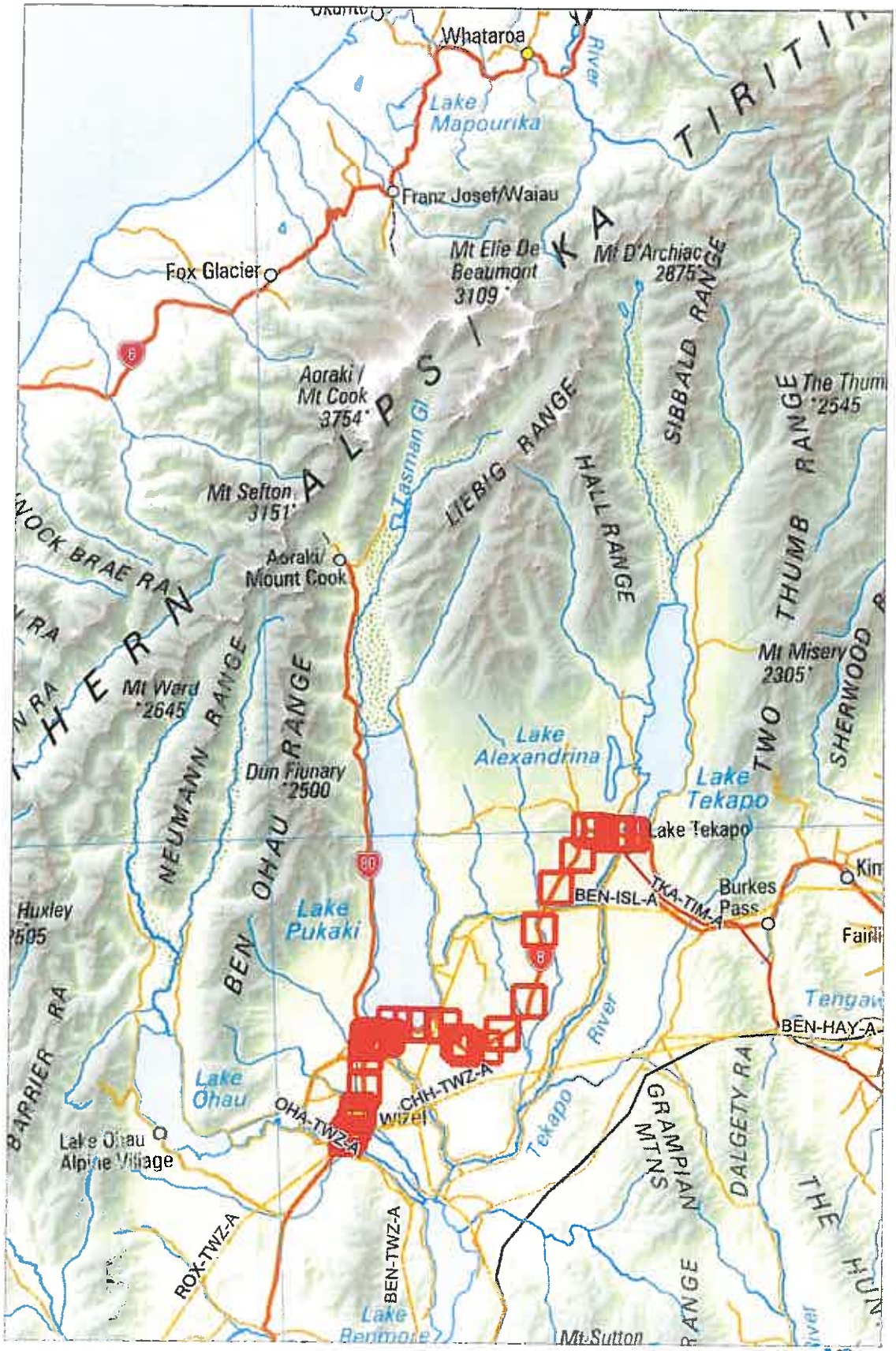
350 kV HVDC	Double Circuit Towers Single Circuit Towers Double Circuit Poles Single Circuit Poles Submarine Cable
220 kV AC	Double Circuit Towers Single Circuit Towers Double Circuit Poles Single Circuit Poles Underground Cable
110 kV AC	Double Circuit Towers Single Circuit Towers Double Circuit Poles Single Circuit Poles Underground Cable
50/66 kV AC	Double Circuit Towers Single Circuit Towers Double Circuit Poles Single Circuit Poles Underground Cable

Note: This is Construction Voltage operating voltage may be less

This map is an indicative description of the Transpower Network

Transmission Network as at July 2000

Not to Scale



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40 kms

APPENDIX B -

The National Policy Statement on Electricity Transmission 2008 (NPSET)

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 328, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.

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

POLICY 10
In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

POLICY 11
Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

9. Maps

POLICY 12
Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.

10. Long-term strategic planning for transmission assets

POLICY 13
Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

POLICY 14
Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

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

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

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

APPENDIX C –

LIST OF CHANGES ENDORSED AS PER THIS EVIDENCE

Part A – Changes Recommended In The Planner's Report

A1 Issue 7

Add the following to Issue 7 (underlined text amended; bold text preferred to the text in brackets):

Existing and new development, other than rural lifestyle development, may also result in an increase in the level of modification in the landscape and in an associated reduction in naturalness. As an example, nationally significant electricity and defence infrastructure can be found within the Mackenzie Basin including at Pukaki, Tekapo and Ohau. This will need to be maintained and upgraded, from time to time. [Striking a balance] ***The balance to be struck*** *between the need for essential infrastructure and the desire to protect particular landscape values is an issue in this context*

A2 Objective 3A

Amend Objective 3A as follows (underlined text amended):

To protect and sustain the outstanding landscapes and features of the District from inappropriate subdivision, use and development ***and*** *for the benefit of present and future generations."*

(Note: word in **bold** omitted from the Planner's recommendation, presumably in error).

A3 Explanation and Reasons to Policy 3A

Amend the second bullet point of the Explanation and Reasons for Policy 3A to read as follows (underlined text amended):

The landscape values of the Mackenzie Basin thus result from cultural factors such as land use, built structures, social pattern and identity as well as from natural factors such as the ecology, climate and topography.

AND

Add a new bullet point to the Explanation and Reasons for Policy 3A to read as follows (underlined text amended):

Sustainable management of natural and physical resources will not be sustained unless the integrity of the values associated with the Mackenzie Basin resources, including visual and landscape qualities, can be assured.

A4 Policy 3B

Retain Policy 3B and its explanation without modification

A5 Policy 3F

Amend Policy 3F - Landscape Carrying Capacity as follows (underlined text amended):

To recognise the diversity of physical settings and landscapes within the Mackenzie Basin and the varying capacity of these to absorb further subdivision and residential buildings and domestication.

A6 Explanation and Reasons for Policy 3C

Add the following to the list of adverse effects under Explanation and Reasons for Policy 3C (new text underlined)

(i) Impacts on the provision of and/or the safe and efficient operation of existing infrastructure including reverse sensitivity effects on utilities and facilities of national significance.

A7 Section 3G

Retain point (ii) in Section 3(G) (underlined text to be added):

(ii) The location and use of the node, in particular any residential use of the node will not have the potential to create reverse sensitivity impacts on rural activities or activities such as airports, power generation, or transmission infrastructure, the state highway, or the Tekapo Military Training Area.

A8 Policies 3I and 3J

Amend Policies 3I and 3J – Farm and Non – Residential Buildings - by combining them as follows (new text underlined, bold text preferable to include):

*To provide for farm buildings and other non-residential buildings within identified and approved building nodes. Where farm buildings and infrastructure require a location remote from nodes because of their purpose, function or effects, ensure that they are located and have an appearance which minimises, **as far as practicable**, their impact on landscape values.*

A9 Policy 3(x)

Insert a new Policy (after Policy 3K) as follows (new text underlined):

Policy 3(x) – Hydro-electricity Generation
To recognise the importance of the Mackenzie Basin, and in particular Lakes Tekapo, Ruataniwha, Pukaki, Ohau, and Benmore and their associated renewable energy generation and transmission infrastructure and operations to the district, region and nation's social, economic and cultural well-being.

AND

Insert a new Explanations and Reasons to support new Policy 3(x) as follows:

This policy recognizes the national importance of this infrastructure and aims to ensure that the values associated with the renewable energy resources of the Mackenzie Basin and its lakes are sustainably managed and not compromised by other development. As noted in Section 15 of this Plan, utilities of national significance are found in the Mackenzie District including the Pukaki High Dam, Tekapo A and B and Ohau A power stations. Lakes Tekapo, Pukaki, Ruataniwha and Ohau were dammed and raised between 1935 and 1985 to generate hydro-electricity while Lake Benmore was created as part of the process of damming the Upper Waitaki.

A10 Policy 3N

Amend Policy 3N - Design and Appearance of Buildings - as follows (amendments underlined):

To control the design, scale, appearance and location of all residential buildings, and other buildings where reasonable, while having regard to the purpose of the buildings, within the Mackenzie Basin to avoid, remedy or mitigate adverse impacts on the landscape and heritage values of the Basin Sub zone.

AND

Amend the Explanations and Reasons to support Policy 3N as follows:

The Council recognises that due to technical, operational and security requirements associated with electricity generation and transmission, the extent to which the adverse landscape effects of these activities can be avoided, remedied or mitigated is more limited than for residential activities. For this reason, the Council will take into consideration the operation, design, and purpose of the building, and the particular locational requirements of utilities infrastructure.

Part B – Changes Sought In Addition To Those Recommended By The Reporting Planner

B1 Objective 3B

Amend the fourth bullet point of Objective 3B as follows (my recommendation underlined):

Assessment of landscapes shall be based on the following characteristics: natural science values, aesthetic values (including memorability and naturalness), shared and recognised values and takata whenua values, legibility values, transient values, natural character, ~~and~~ historic associations, and cultural components (including the built environment).

B2 Policy 3A

Amend the explanation to Policy 3A (bullet point 3) to either recognise that all the land within the Mackenzie Basin Subzone is outstanding or alternatively, include a policy overlay identifying which parts of the Subzone are outstanding.