## Before the Proposed Te Tai o Poutini Plan – A Combined District Plan for the West Coast: Hearings Panel

Under the Resource Management Act 1991 (the Act)

District Plan for the West Coast – Hearing Topic 4:

Energy, Infrastructure and Transport

Between Te Tai o Poutini Plan Committee

Comprising the Buller, Grey and Westland District

Councils

And Transpower New Zealand Limited

Submitter 299 and Further Submitter FS110

Statement of evidence of Rebecca Mary Eng for Transpower New Zealand Limited

Dated 30 October 2023

#### 1. Executive Summary

- 1.1. The majority of the existing National Grid transmission lines in the West Coast region are regulated under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA"). There are some lines in the region that are not regulated by the NESETA, which means that they are subject to the Proposed Te Tai o Poutini Plan ("pTTPP") rules. Transpower does not currently have plans to construct new National Grid assets in the West Coast region but given the potential increase in electricity demand predicted to meet Aotearoa New Zealand's carbon zero aspirations, new National Grid assets may be required within the life of the pTTPP. Any new transmission assets would also be subject to the pTTPP objectives, policies and rules.
- 1.2. Transpower has developed a systematic process that it applies when upgrading and developing the National Grid network. This methodology, known as the 'ACRE' model, is based on a progressive filtering approach more specialised detailed is provided on environmental, property and engineering constraints to enable the identification of preferred routes and sites. The ACRE process ensures that Transpower explores all practicable options for avoiding or reducing effects of new transmission assets and reflects the policy direction for developing the National Grid in the National Policy Statement on Electricity Transmission 2008 ("NPSET").
- 1.3. The NPSET was developed (in part) to require district plans to ensure that the National Grid is not compromised by land use, subdivision and development in close proximity to it. Transpower's National Grid Corridor approach to give effect to Policies 10 and 11 of the NPSET has been relatively settled since 2012. The corridor approach has been developed alongside Transpower's stakeholders. It has a number of important purposes, including to protect people and property from the risks associated with the National Grid and to ensure that the Grid itself is not compromised. The National Grid Corridor approach that Transpower supports is a "two-tiered" consenting regime, whereby those activities that are unlikely to adversely affect the National Grid are permitted, and those activities, buildings and structures that are inappropriate and/or have the potential to compromise the National Grid require resource consent for a noncomplying activity. The provisions now sought for the West Coast region, particularly the non-complying activity status where permitted activity standards are breached, are consistent with the nationwide approach, and that already regulated under the Operative Grey District Plan.

1.4. Transpower has a number of active projects on its existing National Grid assets in the West Coast region. Some of these projects will affect the extent to which subdivision, land use and development is regulated under the pTTPP, i.e., due to changes in the physical extent of transmission lines. Transpower wishes to ensure that the National Grid transmission lines are correctly mapped in the pTTPP in accordance with Policy 12 of the NPSET, following completion of relevant projects.

#### **Table of Contents**

		Page	
Executive Summary			
Qualifications and Experience			
Scope of Evidence			
How Transpower's existing transmission line assets in the West Coast are regulated under the RMA			
Transpower's process for selecting the location of new transmission assets		5	
Protecting the National Grid		8	
Clarification: Transpower's projects and assets in the West Coast region			
Conclusions			
endix A	National Grid Yard activity status in other district plans		
endix B	Map of 169 Alma Road, Westport		
	Qualification Scope of Ev How Transp regulated ur Transpower Protecting th Clarification Conclusions	Qualifications and Experience  Scope of Evidence  How Transpower's existing transmission line assets in the West Coast are regulated under the RMA  Transpower's process for selecting the location of new transmission assets  Protecting the National Grid  Clarification: Transpower's projects and assets in the West Coast region  Conclusions  and A National Grid Yard activity status in other district plans	

#### 2. Qualifications and Experience

- 2.1. My full name is Rebecca Mary Eng. I am employed by Transpower as Technical Lead
   Policy within the Environmental Regulatory Team (part of the Environmental Policy and Planning Group).
- 2.2. For my qualifications and experience and other introductory comments, please refer to paragraphs 2.1-2.3 of my statement of evidence for Hearing Topics 1 and 2 ("Hearing Topics 1 and 2 evidence") dated 29 September 2023.
- 2.3. I have read the 'Code of Conduct for Expert Witnesses' contained in the Environment Court Consolidated Practice Note 2023 and agree to comply with it. As I am employed by Transpower, I acknowledge I am not independent; however, I have sought to comply with the Code of Conduct when preparing my written statement of evidence and will do so when I give oral evidence before the Hearings Panel. Unless I state otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

#### 3. Scope of Evidence

- 3.1. My evidence will address the following:
  - a. How Transpower's existing transmission line assets in the West Coast region are regulated under the Resource Management Act 1991 ("RMA");
  - b. Transpower's process for selecting the location of new transmission assets;
  - The mechanisms available to protect the National Grid from the impacts of landowner development activities, and set out Transpower's preferred National Grid corridor approach;
  - d. Following Hearing Topics 1 and 2, additional details and clarifications regarding Transpower projects and divestments in the West Coast region; and
  - e. Conclusions
- 3.2. My evidence is intended to be read together with my Hearing Topics 1 and 2 evidence, the technical engineering evidence of Mr Shortland-Witehira and the expert planning evidence of Ms Pauline Whitney. Transpower has also lodged evidence to Hearing

Topic 3 District Wide Matters, regarding the regulation of earthworks in proximity to the National Grid.

# 4. How Transpower's existing transmission line assets in the West Coast are regulated under the RMA

4.1. The NESETA came into effect in January 2010. It provides a national framework for consent requirements for the operation, maintenance and upgrading of National Grid lines owned and operated by Transpower and existing on 14 January 2010. It does not apply to substation or electricity distribution lines, nor does it apply to the construction of new transmission lines. The NESETA regulates how Transpower's existing lines in the region are developed and maintained, rather than the pTTPP rules. Most of the existing transmission lines in the West Coast are regulated by the NESETA, but the region is unique in that there is at least one transmission line¹ that has been acquired by Transpower since 2010 and is therefore regulated by the pTTPP. Transpower intends to table a fulsome description and maps of the specific transmission lines that are regulated by either the pTTPP or the NESETA at the Topic 4 hearing.

#### 5. Transpower's process for selecting the location of new transmission assets

- 5.1. Paragraph 6.5 of my Hearing Topics 1 and 2 evidence explains that as the economy electrifies in pursuit of the most cost efficient and renewable energy sources, electricity demand is likely to more than double by 2050. This will necessitate significant and frequent investment in New Zealand's electricity generation portfolio over that period, including the National Grid. While there are no current plans for new National Grid assets on the West Coast at this time, that situation could change within the life of the pTTPP. This means that the extent to which the pTTPP objectives, policies and rules regulate both existing and new National Grid transmission infrastructure is critical to Transpower.
- 5.2. The NESETA does not apply to National Grid substations or transmission lines constructed after 14 January 2010. This means that Transpower relies on the consenting and/or designation process under the RMA to gain approval for any new National Grid assets constructed after this date.
- 5.3. As part of the process of securing RMA approvals for new National Grid infrastructure,

  Transpower uses various tools to select the route of any new transmission line or the

The Proposed Te Tai o Poutini District Plan: Hearing Topic 4 Statement of Evidence of Rebecca Eng for Transpower New Zealand Ltd October 2023

<sup>&</sup>lt;sup>1</sup> Dobson-Tee A 110kV single circuit transmission line is one such asset that is regulated by the pTTPP.

site of any new substation. A key methodology is the ACRE process. Transpower developed the ACRE model to identify and secure the most suitable location for transmission infrastructure. It is based on a progressive filtering approach, where increasing and more specialised detail is provided on environmental, property and engineering constraints throughout the process to enable the identification of a preferred route or site.

- 5.4. The key stages of the ACRE process are summarised below (these can be modified or combined, depending on the scale and nature of the project):
  - a. A Area (identification of the wider study area within which the project might occur; undertaking constraints and opportunities mapping);
  - b. C Corridor (identification and confirmation of alternative corridors, ranking and selection of preferred corridor);
  - c. R Route (selection and evaluation of a route, or alternative routes, within the preferred corridor, consultation on one or more routes and confirmation of preferred route, following public consultation); and
  - d. E Easement/Designation (identification and confirmation of the easement and designation centreline). There are two further process steps, referred to as "D" and "S".
    - i. D Documentation (preparation of full documentation for lodgement with councils); and
    - ii. S Statutory Process (lodgement of documents for statutory approvals under the RMA, board of inquiry/council hearings, Environment Court appeal process where relevant).
- 5.5. During the Area, Corridor, Route and Easement/Designation stages, consideration is given to the location of the proposed infrastructure, with negative scoring being given to any special areas, such as Sites and Areas of Significance to Māori, historic heritage sites, Significant Natural Areas or Outstanding Natural Landscapes (ONL).
- 5.6. The ACRE process allows for a trade-off between several factors, with the intent of finding a preferred solution:

- a. It takes into account technical and operational requirements, such as the need to connect to existing assets, or maintain safety clearances;
- b. It demonstrates that adverse effects have been avoided through the site, route and method selection – although it will not always be possible to avoid all adverse effects;
- Sensitive activities such as residential areas can be mapped, so that options
  which avoid effects on sensitive activities are known and appropriately factored
  in; and
- d. Town centres and other valued locations such as areas of high recreational value, ONLs, ecological areas and areas of high natural character are also mapped, so that consideration to avoiding those areas can occur.
- 5.7. Often it is not practicable to avoid adverse effects on all identified values. For example:
  - a. Avoidance of urban areas and sensitive activities can often deflect assets towards areas with greater landscape, natural character or recreational value (i.e., non-urban locations);
  - b. Avoiding particular locations can also mean a National Grid transmission line must take a longer route, impacting a greater number of people and values along that longer route, and costing more to develop, operate and maintain (that cost being borne by electricity users);
  - c. Reducing the height of lines (to reduce their visibility) can mean that a greater number of support structures (towers or poles) are required to maintain safe ground-to-conductor clearances. Lower conductors can require greater vegetation clearance, and more extensive access tracks for the greater number of support structures; and
  - d. Undergrounding lines is often prohibitively expensive, still requires earthworks, a clear corridor (including clear of vegetation and above-ground structures) and can complicate maintenance and repairs.
- 5.8. The ACRE process reflects NPSET policies in terms of seeking to avoid some areas while taking in to account the technical and operational requirements of the Grid in the route, site and method selection process. I would support a district plan framework that supports the ACRE process and recognises it as a key tool for managing the effects

of National Grid development, particularly given that it is not always possible to avoid effects.

#### 6. Protecting the National Grid

Mechanisms available to protect the National Grid

- 6.1. Most National Grid transmission lines and substations were originally built in the early to mid-twentieth century in (what were then) rural areas over open land. These areas posed little to no constraint on the ability to operate, maintain, upgrade and develop the National Grid.
- 6.2. Over time, urban boundaries have expanded and both urban and rural development has occurred under, and in close proximity to, National Grid assets. There are a range of regulatory tools that variously provide for the National Grid, each with different pros and a cons.
- 6.3. Nationwide, only a small proportion of transmission lines are designated. None are located within the West Coast region. In addition, Transpower has very few easements in place over its transmission lines. Under the Electricity Act 1992, Transpower can access, maintain and upgrade its lines on private property. However, under this regime alone Transpower has little direct control over activities that have been constructed under, and in close proximity to, the National Grid without Transpower's knowledge or consent. The risks and effects of inappropriate land use and development of this nature are covered in detail within Mr Shortland-Witehira's evidence.
- 6.4. The NESETA are enabling of many of Transpower's activities on existing National Grid transmission lines. However, they do not include any provisions to regulate subdivision, land use or development carried out by third parties near the National Grid that may compromise the assets.
- 6.5. The NPSET was developed (in part) as a mechanism to provide better management controls for National Grid activities and third party activities that impact the Grid. Policies 10 and 11 in particular provide direction to protect the National Grid from inappropriate subdivision, land use and development (emphasis added) as follows:

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...* 

- 6.6. While these policies are not prescriptive in the form of rules or definitions, the mandatory language used in these policies means that councils must ensure that appropriate protections are in place. Ms Whitney's evidence includes further comments on Policies 10 and 11 of the NPSET.
- 6.7. It is critical that planning documents create clear expectations in relation to development near transmission lines, so that any development can occur safely and not compromise the National Grid. It is my experience that councils and applicants often do not recognise Transpower as being affected by consent applications involving works in close proximity to the Grid. This lack of understanding has meant that projects and works may begin before Transpower is able to consider the implications and safety requirements of a project near the National Grid. Even if Transpower is able to be notified through a consent process, it is important that district plans do not create development expectations that are inconsistent with the protection of the National Grid. Safeguards must be put in place within the pTTPP to prevent these scenarios from arising.
- 6.8. Mr Shortland-Witehira's evidence describes the risks and effects of inappropriate subdivision, land use and development in relation to the National Grid.
- 6.9. The purpose of this section of my evidence is to describe the "how", that is, the strategic planning approach that Transpower supports for implementing Policies 10 and 11 of the NPSET in the form of provisions within district plans. I also provide some wider context in terms of how other district plans address these matters.

#### National Grid corridor approach

6.10. As described in my Hearing Topics 1 and 2 evidence, the National Grid extends across New Zealand and is nationally significant infrastructure. The nature of the assets across New Zealand and their operational and technical requirements are very similar. Accordingly, Transpower considers that it follows that the National Grid Corridor should be treated consistently across the different councils. For this reason, Transpower participates in every plan review and plan change in the districts the National Grid is located and seeks a consistent National Grid corridor approach.

- 6.11. The National Grid corridor approach supported by Transpower around New Zealand has eight important purposes. The purposes and practical outcomes of these policies are outlined below:
  - e. To ensure that sensitive activities, such as residential development, are generally not provided for near National Grid structures and lines: Sensitive activities include the establishment of dwellings, schools, hospitals and papakāinga close to the Grid.<sup>2</sup> Such activities are incompatible with the National Grid and lead to significant effects both on and from the Grid. The purpose of Policy 11 of the NPSET is to prevent sensitive activities (including the expansion of existing sensitive activities) from being established near the National Grid:
  - f. To avoid reverse sensitivity effects: As outlined by Mr Shortland-Witehira, reverse sensitivity effects occur when people undertake activities close to an existing line or structure. For example, National Grid lines can cause noise (especially in damp weather), reduced visual amenity, radio and television interference, perceived effects of electric and magnetic fields from the lines, and interference with landowners' business activities beneath the lines. These effects often lead to neighbouring landowners/occupiers wanting to constrain operation or alter the existing lines. Reverse sensitivity effects can occur from third party residential uses, but also other uses such as commercial and healthcare activities. Landowner complaints can ultimately lead to constraints on the operation, maintenance and upgrade of existing National Grid assets. The purpose of Policy 10 of the NPSET is to manage activities to avoid these effects;
  - g. To protect the integrity of the National Grid (structures and lines): As also outlined by Mr Shortland-Witehira, buildings and other land use activities that are too close to a transmission line and support structures can affect the stability of that line and contribute to electricity outages. The presence of these structures and activities can also increase the need for, and thereby the risk associated with, mobile plant (such as cranes) and other equipment. Transpower therefore seeks to ensure that safe distances are maintained so the risk of coming into contact with the lines is minimised. This purpose is

<sup>&</sup>lt;sup>2</sup> See NPSET 'Interpretation', page 2.

- aligned with the requirement in Policy 10 of the NPSET to ensure that operation of the electricity transmission network is not compromised;
- h. To enable efficient and safe operation, maintenance and potential upgrade operations: A relatively clear area is needed for line workers to gain access to transmission lines and structures in order to conduct operational maintenance on high voltage equipment, sometimes at great heights. Examples of these activities are provided in Mr Shortland-Witehira's evidence. The National Grid corridors also limit the need for costly workarounds (for example, bypass lines), when maintaining and operating the Grid. In addition, corridors can also preserve the ability to undertake upgrades in the future, rather than potentially having to construct a new asset. This purpose is aligned with the requirement in Policy 10 of the NPSET to ensure that maintenance and upgrading of the electricity transmission network is not compromised;
- i. To ensure reliable and secure electricity supply: This outcome of the policy framework is self-evident. It speaks to the need to provide residential, rural, commercial and industrial electricity users in the West Coast region with a reliable and secure supply of electricity that, in accordance with Policy 10, is not compromised;
- j. To minimise safety hazards: Electricity transported at high voltages can cause serious, or even fatal, injuries to people who come in close contact with the lines. Corridor management is therefore of paramount importance as it provides for the wellbeing, health and safety of people, and is consistent with identifying an appropriate buffer corridor, as set out in Policy 11; and
- k. To provide the community, Council and Transpower with the knowledge and confidence that the lines are being managed in a safe and sustainable manner. Given all of these factors, it is necessary to provide clear and efficient planning provisions that respond to the policy framework established by the NPSET. A proactive approach that provides certainty to landowners, the community, Council and Transpower is appropriate given the significance of the issues and the NPSET directions.
- 6.12. The current approach supported by Transpower has been relatively settled since 2012 following Environment Court appeal, Board of Inquiry, Independent Hearings Panel processes and ongoing engagement with Transpower's key stakeholders. The current

approach is broadly reflected in the Grey District Plan corridor provisions, which became operative in 2015.<sup>3</sup>

- 6.13. Transpower began seeking corridor provisions in district plans in 1996 and initially sought a blanket 20-metre setback from the centreline that related to land use and/or subdivision, and sometimes earthworks. This setback did not distinguish between sensitive activities and non-sensitive activities and did not differ depending on asset type. Following the introduction of the NPSET in 2008, Transpower often sought a much broader corridor, with land use requiring consent out to 32 metres either side of the centreline. Waimakariri District Council included an even broader corridor out to 100m either side of the centreline.
- 6.14. In 2012, Transpower undertook a significant review of the provisions it was seeking to give effect to Policies 10 and 11 of the NPSET in response to discussions with stakeholders and impacts that have occurred on the National Grid. Part of this review resulted in standardising the National Grid corridor widths spatially depending on the voltage of the transmission lines and their support structure types. The width of the corridors, together with the activities restricted within them, have been formulated to give effect to Policies 10 and 11 of the NPSET in an integrated manner, considering:
  - a. Conductor swing calculations. Buildings and activities within the 10 or 12 metre buffer corridors are effectively under the conductors in normal wind conditions. Buildings and activities in the subdivision corridor could be under the conductors in high wind conditions (the National Grid Subdivision Corridor provisions will be considered by the Hearings Panel at a future hearing, other than the definition of "National Grid Subdivision Corridor" which is allocated to Topic 4 and addressed in Ms Whitney's evidence);
  - b. The maintenance, access and workspace requirements explained in Mr Shortland-Witehira's evidence. The 10 or 12m corridor will allow the support structures and conductors to be accessed, and provide sufficient space for most (but not all) maintenance activities. The 10 or 12m corridor will not eliminate all inconvenience caused by operation and maintenance activities, nor necessarily ensure full access for maintenance activities is provided in all circumstances it attempts to strike a reasonable balance;

<sup>&</sup>lt;sup>3</sup> There are no National Grid assets in Westland District. Buller District Council has not previously implemented the National Grid corridor provisions in its Operative District Plan.

- c. An understanding that restrictions on land uses (both the geographical extent of land restricted and the range of uses restricted) need to be justified and allow for continuing reasonable use of the land. Some of Transpower's operation, maintenance, upgrading and development would be easier and cheaper if a larger transmission buffer corridor was provided. However as discussed by Mr Shortland-Witehira, day-to-day maintenance is not carried out in high winds, so it was considered more reasonable to focus on the 10-12m corridor for restricting land use;
- d. Transpower does not consider that resource consent should have to be obtained for activities which are unlikely to compromise the National Grid now or in the future. Such activities include uninhabited farm and horticultural buildings. Unnecessarily requiring resource consent adds unnecessary costs, both for the landowner and Transpower (who would be notified of the applications).
- 6.15. As a result, Transpower now only seeks a two-tiered consenting framework for buildings and activities near transmission lines: permitted and non-complying activity status. This is reflected in the Topic 4 evidence of Ms Whitney. The objective of this is to avoid the need for resource consent applications that Transpower can support without any controls in place (other than compliance with permitted activity standards). Similarly, non-complying activity status signals that resource consent will be difficult to obtain for those activities, buildings and structures that are inappropriate and/or have the potential to compromise the National Grid.
- 6.16. The Grey District Plan corridor provisions were subject to Environment Court proceedings which were settled between parties ahead of a hearing and subsequently endorsed by the Court. The matter at issue was the activity status for proposals that breached permitted activity standards in the National Grid Yard, and whether it should be non-complying or something more enabling. The matter was ultimately settled prior to a hearing and non-complying activity status confirmed.<sup>4</sup>
- 6.17. The table at **Appendix A** sets out the activity status that applies to buildings/structures within the National Grid Yard in other district plans around New Zealand. In summary, of the 35 district plans with operative National Grid Corridor provisions since 2012, the

<sup>&</sup>lt;sup>4</sup> Residential Environmental Area Rule 16.7.4A(iv), Township Environmental Area Rule 17.7.4A(iv), Rural-Residential Environmental Area Rule 18.7.4A(iv), Rural Environmental Area Rule 19.7.3A(iv), and Commercial and Industrial Environmental Area Rule 20.7.3A(iv).

activity status for buildings and structures in the National Grid Yard is non-complying in 31 of those district plans.<sup>5</sup>

6.18. Transpower values its relationship with councils, the community and landowners. It endeavours to work with them to reach the best outcome for all parties concerned. Transpower works with councils around the country prior to, and after notification of plan changes and plan reviews to give effect to the NPSET. Transpower continues to engage with councils once operative plan provisions are in place, including involvement in the resource consent process. It has a team of staff members and an online enquiry portal dedicated to this task.

#### 7. Clarification: Transpower's Projects and Assets in the West Coast region

- 7.1. Paragraph 5.9 of my Hearing Topics 1 and 2 evidence describes several active projects currently taking place on West Coast region National Grid assets.<sup>6</sup>
- 7.2. I wish to make a correction and clarify details of these projects, including in response to submitter number S527 (John Walsh) who sought that the National Grid buffer corridor provisions be removed from 169 Alma Road, Westport. Ms Whitney's evidence addresses this matter in terms of the planning response.

Divestment and Dismantling Projects near Waimangaroa

- 7.3. The Inangahua-Westport B transmission line is being dismantled, between Waimangaroa Substation and Westport. The work is being carried out in two stages, where Stage 1 involves dismantling the section between the Orowaiti "Tee" and Westport. The Stage 1 section traverses 169 Alma Road. As such, this line and its support structures will be removed from the property and the National Grid corridor provisions in the pTTPP will not apply.
- 7.4. The Waimangaroa-Westport A transmission line between Orowaiti "Tee" and Westport was transferred to the ownership of Buller Electricity Limited in June 2023. This line also traverses 169 Alma Road. As this section of the transmission line including where it traverses 169 Alma Road is no longer part of the National Grid (i.e., it is not owned

<sup>&</sup>lt;sup>5</sup> For simplicity, I have grouped the "non-complying" activity status to capture the approach to regulation of buildings and structures in the National Grid Yard generally, It is intended to capture sensitive activities as defined in the NPSET (including residential buildings, schools and hospitals) and those buildings and structures that have the potential to compromise the National Grid and/or result in reverse sensitivity effects.

<sup>&</sup>lt;sup>6</sup> These include decommissioning Waimangaroa Substation, dismantling part of the Inangahua-Westport B transmission line, pole replacements on the Blackwater-Inangahua A Transmission line, Atarau Substation divestment and Otira Substation upgrade.

or operated by Transpower), the National Grid corridor provisions in the pTTPP will not apply.

7.5. These transmission lines as they traverse 169 Alma Road are shown graphically in **Appendix B**. To allow time for relevant projects to be completed, Transpower proposes to provide updated mapping and shape files to the Hearing Panel ahead of the Outstanding matters hearing in September/October 2024. While this is some time away, I note the Grid provisions in the pTTPP do not have legal effect at this time.

Waimangaroa and Atarau Substations dismantling and divestment

7.6. My Hearing Topics 1 & 2 evidence stated that Waimangaroa substation is being reconfigured. The transmission lines near the substation will be reconfigured given the dismantling projects, and the substation itself will also be dismantled and the land ultimately divested.

#### 8. Conclusions

- 8.1. The National Grid is nationally significant infrastructure. The NPSET requires that the National Grid be recognised and provided for in the pTTPP, both in terms of appropriately enabling its ongoing operation, maintenance and upgrade, but also by establishing a regulatory framework for new transmission assets that recognises its adverse effects cannot always be avoided.
- 8.2. Policies 10 and 11 of the NPSET also require that other activities around the National Grid do not compromise the operation, maintenance, development and upgrading of the infrastructure, that reverse sensitivity effects are managed, and that sensitive activities are generally not provided for around the infrastructure. Transpower has refined its approach to the implementation of the NPSET in districts around the country. The provisions now sought for the West Coast region, particularly the non-complying activity status where permitted activity standards are breached, are consistent with the nationwide approach, and that already regulated under the Operative Grey District Plan.
- 8.3. The issue is in attaining the appropriate balance in order to serve the interests of all parties and give effect to the NPSET in the most effective and efficient manner. For the reasons set out above, Transpower requests that the Hearing Panel adopts the provisions appended to Ms Whitney's evidence.

8.4. Transpower has a number of active projects on its existing National Grid assets in the West Coast region. Some of these projects will affect the extent to which subdivision, land use and development is regulated under the pTTPP, i.e., due to changes in the physical extent of transmission lines. Transpower wishes to ensure that the National Grid transmission lines are correctly mapped in the pTTPP in accordance with Policy 12 of the NPSET, following completion of relevant projects.

#### **Rebecca Mary Eng**

30 October 2023

Appendix A: National Grid Yard activity status in other districts

District/Unitary Plan <sup>7</sup>	Year Operative	Sensitive activities, buildings or structures in the National Grid Yard	
		Rules in Plan	Activity Status
	Operative Na	tional Grid Co	orridor Provisions
Dunedin City	2023	✓	Non-complying
Queenstown Lakes District	2022	✓	Non-complying
Ōpōtiki District	2019	✓	Non-complying
Kāpiti Coast District	2018	✓	Non-complying
Hurunui District	2017	✓	Non-complying
Invercargill City	2017	<b>✓</b>	Non-complying
Christchurch City	2017	✓	Non-complying
Whanganui District	2017	✓	Non-complying
Palmerston North City	2017	✓	Non-complying
South Taranaki District	2017	✓	Non-complying
Whakatāne District	2017	✓	Non-complying
Hamilton City	2017	✓	Non-complying
Auckland	2017	✓	Non-complying
Thames-Coromandel District	2017	<b>√</b>	Non-complying
Kaipara District	2017	✓	Non-complying
Far North District*	2017 (District Plan Review notified 2022)	<b>✓</b>	Non-complying
Napier City*	2016 (District Plan review notified 2023)	<b>✓</b>	Non-complying
Hutt City	2016	✓	Non-complying

<sup>&</sup>lt;sup>7</sup> The councils identified with an asterisk \* are those that have operative National Grid corridor provisions but have recently or are currently revisiting these as part of a district plan review.

District/Unitary Plan <sup>7</sup> Year Operative Sensitive activities, buildings or structure Yard		activities, buildings or structures in the National Grid	
		Rules in Plan	Activity Status
Porirua City*	2016 (District Plan review hearings 2022)	<b>✓</b>	Restricted discretionary and non-complying
Hastings District	2016	<b>√</b>	Non-complying
Southland District	2015	<b>✓</b>	Non-complying Non-complying
Grey District*	2015 (Te Tai o Poutini hearings 2023)	<b>√</b>	Non-complying
Waipa District	2015	<b>√</b>	Non-complying
Rotorua District	2015	✓	Non-complying
South Waikato District	2015	✓	Non-complying
Matamata-Piako District	2014	✓	Non-complying
Hauraki District	2014	<b>✓</b>	Non-complying Non-complying
Whangārei District	2014	<b>✓</b>	Non-complying Non-complying
Ruapehu District	2013	<b>✓</b>	Restricted discretionary, discretionary and non- complying
Rangitikei District	2013	✓	Discretionary
Horowhenua District	2013	<b>✓</b>	Non-complying Non-complying
Waimate District	2013	<b>✓</b>	Non-complying Non-complying
Central Otago District	2013	<b>✓</b>	Non-complying Non-complying
Western Bay of Plenty District	2013	<b>✓</b>	Non-complying
Tauranga City	2012	<b>✓</b>	Restricted discretionary, discretionary and non- complying
Ashburton District	2012	<b>✓</b>	Non-complying Non-complying
Ōtorohanga District	2012	<b>√</b>	Discretionary

District/Unitary Plan <sup>7</sup>	Year Operative	Sensitive activities, buildings or structures in the National Grid Yard		
		Rules in Plan	Activity Status	
Upper Hutt City	2012	✓	Restricted discretionary and non-complying	
Kawerau District	2011	<b>√</b>	Restricted discretionary and non-complying)	
Stratford District	2009	×	Discretionary	
Waimakariri District*	2008 (District Plan review hearings 2023)	<b>√</b>	Discretionary	
Councils und	derway with consultation	n processes t	o implement the National Grid Corridors <sup>8</sup>	
Waikato District	Appeals	<b>✓</b>	Non-complying	
New Plymouth District	Appeals	✓	Non-complying	
Central Hawke's Bay District	Appeals	<b>✓</b>	Non-complying	
Marlborough District	Appeals	<b>✓</b>	Subject to appeal	
Selwyn District	Appeals	<b>√</b>	Non-complying	
Buller District	Hearings (Te Tai o Poutini)	<b>✓</b>	Non-complying	
Wellington City	Hearings	<b>√</b>	Non-complying	
Waitomo District	Submissions	<b>√</b>	Non-complying	
Timaru District	Submissions	<b>√</b>	Non-complying	
Gore District	Notified	×	-	
Masterton District	Notified (Combined Wairarapa District Plan)	<b>√</b>	Restricted discretionary	
South Wairarapa District	Notified (Combined Wairarapa District Plan)	<b>✓</b>	Restricted discretionary	

<sup>&</sup>lt;sup>8</sup> This is both pre-notification consultation and RMA Schedule 1 consultation processes. These councils may have some form of regulation of land use and development near the National Grid, but the provisions may not give effect to the NPSET.

District/Unitary Plan <sup>7</sup>	Year Operative	Sensitive activities, buildings or structures in the National Grid Yard	
		Rules in Plan	Activity Status
Carterton District	Notified (Combined Wairarapa District Plan)	<b>✓</b>	Restricted discretionary
Tasman District	Pre-notification	×	-
Manawatū District	Pre-notification	×	-
Nelson City	Pre-notification	<b>√</b>	Discretionary
Waitaki District	Pre-notification	×	-
Councils that have i	not yet started any p	rocess to gi	ve effect to Policies 10 and 11 of the NPSET <sup>9</sup>
Wairoa District	N/A	×	-
Tararua District	N/A	<b>✓</b>	Discretionary
Gisborne District	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction	
Westland District	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction	
Kaikōura District	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction	
Chatham Islands	N/A	No provisions necessary – No National Grid infrastructure located in this jurisdiction	

<sup>&</sup>lt;sup>9</sup> These are councils that have not instigated any consultation to give effect to the NPSET (that Transpower is aware of).

Appendix B: Map of 169 Alma Road, Westport			

### TRANSPOWER 169 Alma Road, Westport Legend Maximo Assets Structure Single Circuit Pi Pole Double Circuit Steel Tower Earthwire Line divested to Span **Buller Electricity** - 110 kV 176 WMG-WPT-A0213 IGH-WPT-B0157 WMG-WPT-A0212 IGH-WPT-B0156 WMG-WPT-A0211 Line currently being dismantled WMG-WPT-A0210 141 Copyright: Transpower New Zealand Limited and licensors. All 50 100 rights reserved. If you have received this document from Transpower you must use it only for the purpose Transpower provided it to you. If you have received this document from someone other than Transpower, you must not use the 27-Oct-2023 Scale 1: 2257 Plan size: A4L THIS MAP IS NOT TO BE USED FOR NAVIGATION document and must destroy it or return it to Transpower.