

# NOTES FOR HEARING

## ENERGY, INFRASTRUCTURE, TRANSPORT,

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Representing myself and Buller Conservation Group, I have read the report of Grace Forno and Ivy McGrath,

### s42A Report

Firstly, I would like to say that there is a lack of consistency in the S42A report for Energy, Infrastructure, Transport.

- There is incomplete wording, mismatched words
- there are amendments in the S42A report not carried through to, or completely missing from, the Appendix 1 Proposed Amendments.
  - Example 1.           ENG – RXX New Lines, Telecommunication Poles or Towers
    - 1. All performance standards in Rule ENG - R1 are complied withClause (1) is deleted from the S42A report.
  - Example 2           ENG – RXX The construction of distribution lines and transmission lines not managed by the National Environmental Standard for Electricity Transmission Activities
    - I cant find any mention of this proposed permitted activity in the S42A report.
- Each tranche of amendments to objectives, policies, rules are bunched together whereas earlier S42A reports dealt with each individually, which made it much more user-friendly.
- It is far too hard to find out what the S42A report recommends as those recommendations are scattered through the analysis, whereas earlier S42A reports had a final paragraph with the recommendations in relation to each objective, policy, rule.
- there is heavy use of tables, or a different way of using tables is happening, which interferes with copy and pasting,. The way tables were used in the earlier S42A reports is much more user-friendly.
- I would like to see any future S42A reports follow the format and layout of the S42A reports of the first 2 hearings.

## Definition:

S42A, p38, and at paragraph 147

### LARGE SCALE DISTRIBUTED ELECTRICITY GENERATION

means, ~~when applied to provisions in the Energy Chapter,~~ electricity generation activities utilising renewable energy sources with a capacity of greater than ~~400kW~~20kW for the purposes of exporting electricity directly into the distribution network or National Grid. It includes all ancillary components and activities such as lines, poles, structures, substations, climate / environmental monitoring equipment, earthworks, roading, maintenance buildings, temporary concrete batching plants, internal transmission and fibre networks, and site rehabilitation works.

This definition is the only time the phrase 'large scale distributed electricity generation' is used in the pTTPP according to my text search function. 'large scale' has been removed from ENG P6, we have 'large scale energy activities' in ENG RXX, 'large scale renewable electricity generation' in ENG R15, R16, R25, but nowhere is the phrase, 'Large scale distributed electricity generation' used in the pTTPP. so, to me, the definition is pointless. The definition was evidently changed from 'large scale' to 'Large scale distributed electricity generation' There are a number of mentions of 'large scale' in the pTTPP. "Large scale' needs to be reinstated as a definition.

The same applies to **'Small scale'**. 'Small scale' needs to be reinstated.

## Objectives

### ENG 03

No explanation as to why 'incompatible' was deleted.

## Policies

### ENG P2

The amendment to the leading statement makes no sense.   If a comma, or better a semicolon, is added after 'new' then it does. This also applies to P5

The leading statement also requires better wording for it to make sense - look at 'manage' versus 'have' in P2 and 'manage' versus 'recognise' in P5

Manage adverse effects from the development of new or development, operation, maintenance or upgrading of existing energy activities have particular regard to the

benefits including;

### **P3**

Manage adverse reverse sensitivity effects from subdivision, use and development on energy activities

There is no need to include both adverse and reverse sensitivity because reverse sensitivity means an adverse effect

The original P3 is much better worded, the amendment does not convey any different meaning, it is just a rearrangement of wording, for the worse. Reverse sensitivity and adverse effects are two different concepts; they have been merged into one concept in the updated statement 'Adverse effects' are not necessarily coming from only reverse sensitivity effects.

### **P4**

~~Minimise~~ Manage adverse effects on communities and the environment from energy activities by:

a. Having regard to the values associated with areas identified as having significant environmental values, ~~urban amenity, areas of high recreational value~~, outstanding and high natural character areas, outstanding landscapes and features, Poutini Ngāi Tahu and heritage sites, and significant natural areas;

s42A at 211 says 'In our opinion energy activities have significant potential to adversely impact urban amenity and should be a consideration. We do not support the removal of 'communities' as in our opinion this is inconsistent with the pTTPP language and the RMA provides for communities and the environment in relation to the management of adverse effects.' Yet 'urban amenity, recreational area' was removed.

I find this to be a contradiction, especially as the leading statement is about communities and environment; one being the environment, is expanded on, the other being community, is not.

'urban amenity, recreation areas' needs to be reinstated.

### **P5**

As iterated above, P5 needs better wording.

also, in (a) the first 'needs' needs to be eliminated.

a. Recognising their functional **needs** and operational needs;

## **P8**

changes accepted

## **Energy standards**

S42A @ 239, p84. s552.043 (BCG, p16)

I submitted that the plan is making it too permissive for telecom infrastructure such as poles and towers, in particular R9, which would allow a cellphone tower to be built without resource consent. It takes serious community involvement, involving time, angst, money, to get a badly-placed cell tower removed. If there was a public consenting process people would not have to go to extreme lengths to a right badly-placed cell towers.

There is also another concern. Increasingly wireless technology is being used but there is nothing in the plan to address intensity limits or reach, especially in residential zones.

## **R3**

needs to have (distribution) reinstated and (zone) deleted

## **R4**

The operation, maintenance and **minor** upgrading of distribution lines and transmission lines not managed by the National Environmental Standard for Electricity Transmission Activities

3. A replacement pole, tower, or structure does not exceed the height of the original pole, tower, or structure by **more than 30 percent**, measured from the top of the foundation;

5. Additional conductors or lines do not increase the number of conductors or lines by **more than 100 percent** of the original;

6. The footprint of the structure or building does not increase by **more than 30 percent** of the existing building or structure, excluding any pole or pi pole structure provided above;

In my original submission I stated that R4(3) and (6) 30% and (5) 100% is too much for a permitted activity. The leading statement refers to **minor** upgrade; 30%, or one third, is not minor from my viewpoint.

A more reasonable increase for (3) and (6) would be 20%, and for (5) would be 50%. Any further increase should require scrutiny through the RC process.

R4 (7) mandates 20% maximum for increasing antenna dishes, which is more reasonable.

## **R6**

The deletion of (2) ~~These are energy activities~~ does not make sense of (3) which follows (2)

(3) The following other activities are able to occur under the conductors where these are **p**Permitted within the relevant zone and overlay:

Activities other than what?

Typo - lower case p in 'permitted' please. this also needs to be altered in R7.

I understand the double meaning of permitted in this context, it is descriptive (by being allowed) as well as a noun but in the way it is being used here it should be lower case.

## **R7**

(2)(iii) Be located National Grid Yard - this amendment doesn't make sense.

### **New permitted rules:**

The 1st and 2nd new rules say

Activity status where compliance not achieved:           What is the status?

No activity status is stated.

### **New Permitted activity:**

ENG – RXX     The construction, operation, maintenance and upgrade of community and large scale energy activities excluding wind

I find this inclusion objectionable. Any large scale energy activity will require a consenting process no matter what parts of it are permitted.

R15 also refers to this proposed rule.

ENG – RXX New Lines, Telecommunication Poles ~~or~~ and Towers

2. The connection does not include a new tower;

ENG – RXX The construction of distribution lines and transmission lines not managed by the National Environmental Standard for Electricity Transmission Activities

If this is a new rule, why the underlining? Underlining usually means a new insertion.

## **Infrastructure**

s42A, 344, p105 S552, 553.010

I suggested waste management be included in the infrastructure chapter. (F Inta p 7)

The s42A report says I have provided insufficient evidence.

I am not sure what wording could be proposed, I am not sure of the extant rules around waste management or where in the TTPP it should sit, but possibly in the Infrastructure chapter. Nevertheless waste should be addressed in the plan as it is a territorial activity, and is an issue in every household and most properties. Maybe it could go in the Strategic Direction chapter where our districts could aim for zero waste, and encourage the 3Rs.

## **Definition of Land Transport Infrastructure -**

S42A 7.2.2, p105

If stormwater is included at (i), then where is sewage?

## **Definition for Land Transport corridor.**

S42A 353, p107

S42A says that, because there is only one instance of 'land transport corridor' in the pTTPP it should be removed. Yet, where it is removed, being INF R12, states at (1) - 'This is located within a land transport corridor; and'. 'Land transport corridor' is mentioned 3 times in INF R12.

There is also reference to 'railway corridor' in INF R12(1)(iii)(a) and (b). I support GDC in requesting a definition for 'Land Transport Corridor' 'Land transport corridor' is now a common term but 'legal road boundaries', the proposed substitute, is cumbersome, and less descriptive.

And then..... there is a new definition, for 'Land Transport Corridor', in 'Proposed Amendments', at p41.

'Road and rail transport networks', which is another way to express the corridor, is in TRN

P1

**Overview -**

4th paragraph - the term, 'three waters' is used. This is a novelty term that probably should not be used in a long term plan. INF R2 refers to 'water, wastewater, stormwater' which is better language.

**Policies**

**INF P2** S42A at 395

The word, 'minimize' has been replaced with 'manage'

In other places in Infrastructure e.g. O5, P5, 'minimize' has been retained. 'Minimize' provides better protection than 'manage' therefore it should be retained here.

**Rules**

**INF R6** S42A at 436

There are no conditions on this permitted activity, so how can there be a restricted discretionary activity for it at INF R19?

S42A at 645 The same applies to TRN RX 'Trip generating activities'

**Transport**

**Rules**

**TRN R10** s42A at 623

Removal of the phrase 'above 1000 metres' in relation to landscapes is accepted.

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