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For the Attention of the Hearings Panel, Proposed Te Tai o Poutini Plan - A Combined District Plan for the West Coast

Transpower NZ Ltd comments on Officer Response to Minutes 16 and 22 Strategic Direction

Transpower New Zealand Limited (“Transpower”) writes in relation to Proposed Te Tai o Poutini Plan (“TTPP”), and Minutes 16 and 22 - Strategic Directions. Transpower has read the response of the Reporting Officer (dated 5 April 2024) and provides the following comments on the drafted provisions.

By way of background information and context, Transpower’s submission on the TTPP included two submission points to the Strategic Directions, as follows:

1. The first submission point sought the provision of a new National Grid direction¹. While Transpower supported notified directions CR-O1 to CR-O4 they are not specific to the operation, upgrade or development of infrastructure, rather are linked to natural hazards and resilience. While the objectives are not opposed, in order to recognise the significance and importance of the National Grid and give effect to the NPSET, Transpower sought the provision of a strategic objective specific to the National Grid.
2. The second submission point sought to retain UFD-O1, and in particular clause 8.

Six further submission points were made to notified provisions UFD-O1, CR-O1, CR-O2, NENV-O1, NENV-O3, and NENV-O4.

At paragraph 22 of the Reporting Officer response to Minute 16, suggested redrafted provisions are provided under three headings being: *Climate Change and Resilience*, *Natural Environment*, and *Urban Form and Development*. Transpower has reviewed the drafted provisions and makes the following comments.

General comments:

As a general observation, the references within the strategic directions to infrastructure and energy activities are limited to references within the confines of other strategic directions topics as opposed to being recognised in their own right. Transpower would support the provision of specific policies relating

¹ Provide a new Strategic Direction CR-O5 as follows:

CR-O5 National Grid

The national significance of the National Grid is recognised, and sustainable, secure and efficient electricity transmission is provided through and within the district.

to Infrastructure as follows:

1. Effective, efficient, resilient and safe infrastructure throughout the region that:
 - a. Provides essential, reliable and secure services, including in emergencies;
 - b. Facilitates local, regional and national connectivity;
 - c. Contributes to the economy and supports a high standard of living;
 - d. Has sufficient capacity to accommodate existing and planned growth;
 - e. Integrates with development; and
 - f. Enables people and communities to provide for their health and wellbeing.
2. New regionally significant infrastructure is provided for in appropriate locations and the social, cultural economic, and environmental benefits of this infrastructure are recognised and provided for.

Climate Change and Resilience

The reporting officer has suggested a new suite of provisions specific to climate change and resilience. The provisions are generally supported. In particular Transpower supports CCR-O2² and CCR-P2³ and CCR-P3⁴. The principle of CCR-P6⁵ is supported. However, Transpower would support recognition within the policy of the associated electricity transmission needed to support the development and expansion of renewable electricity generation.

Natural Environment

NENV-O1⁶. The objective is based on notified NENV-O1. Transpower supports the objective in principle but notes the word 'significant' has been inserted in context of ecosystems and biodiversity, and 'outstanding' inserted in context of natural character. For consistency, Transpower would support reference to 'outstanding' in relation to natural features and landscapes.

NENV-P1⁷. The policy is in part based on notified NENV-O3. The policy refers to 'significant areas' or 'significant natural environment areas'. In relation to the reference to 'Significant' within NENV-O1, it is not clear if the policy is confined to 'Significant Natural Areas' as defined in the TTPP, and/or 'Areas of significant indigenous vegetation and fauna habitat', and if the policy applies to Outstanding Natural Features and Landscapes. Transpower again wishes to note the mix of terminology used within the plan is confusing. Transpower seeks clarity within the policy P1 on the terminology used.

In terms of clause b. and the reference to 'functional and operational' need, while the policy recognition is supported, an amendment is sought to amend the 'and' to 'or' to reflect there may well be instances where both needs are not met.

In terms of clause e. which is specific to the need for pest and weed control, Transpower questions whether this matter should be addressed in the TTPP or is best placed as a method to sit outside the district plan.

² **CCR – O2** Greenhouse gas emissions are reduced and opportunities to transition to a low carbon emissions economy are provided, including as a result of new technology.

³ **CCR – P2** Ensure that new locations for regionally significant infrastructure and connections are built away from natural hazards, unless there is a functional or operational need to be in that location.

⁴ **CCR – P3** Enable the development of greater infrastructure self-sufficiency and backup of regionally significant infrastructure on Te Tai o Poutini/the West Coast.

⁵ **CCR – P6** Provide for the further development and expansion of renewable electricity generation at a range of scales across Te Tai o Poutini/the West Coast, to support emissions reductions and a low carbon future.

⁶ **NENV – O1** Recognise, protect and enhance the outstanding natural character, landscapes and features, significant ecosystems and indigenous biodiversity that contribute to the West Coast's/Te Tai o Poutini character and identity and to Poutini Ngāi Tahu's cultural and spiritual values.

⁷ **NENV – P1** In relation to the natural environment recognise:

- a. The substantial contribution to the protection of natural environment values that is made by the existence of public conservation land in protecting significant areas, habitats and features;
- b. The functional and operational need for infrastructure to sometimes be located in significant areas;
- c. There are lawfully established activities located in significant natural environment areas;
- d. The need to support the ethic of stewardship on private and public lands; and
- e. The need for weed and pest control to protect, maintain and enhance natural environment values.

Urban Form and Development

UFD-O1⁸. The objective is supported noting it does not appear to reflect the notified objective.

UFD-P1⁹. The suggested policy is based on notified objective UFD-O1. Transpower has concerns with the redrafting of the notified objective in that clause 1. of the notified objective which refers to 'environments and built form that are attractive' now forms the chapeau for the suggested policy and forms the basis for the other policy considerations. Confining the policy consideration to 'attractiveness' is inappropriate given it is the sole policy for Urban Form and Development, and the very confined nature of the overriding policy directive. It is also open to interpretation what is meant by 'attractive', i.e. does it relate to visual amenity or does it include wider concepts such as financial interest. The chapeau does not make sense in that it reads "Urban and environment and built form...". Clarity is required as to whether the policy applies to urban or all environments and whether the built form is confined to the urban environment or all environments.

When applied to clause g. which is specific to infrastructure, the chapeau means the clause is very limiting in achieving safe, efficient and effective infrastructure. Transpower also has concerns the reference to reverse sensitivity effects within clause g. does not recognise there may be other effects which can compromise regionally significant infrastructure, as recognised in Policy 10 of the National Policy Statement on Electricity Transmission 2008. Transpower also notes there is an absence of reference to 'Energy activities' within the policy.

Based on the above, Transpower continues to support the provision of a specific National Grid specific strategic objective, as sought in the Transpower submission, as follows:

CR-05 National Grid

The national significance of the National Grid is recognised, and sustainable, secure and efficient electricity transmission is provided through and within the district.

Should the Panel require clarification on any matter, please contact Rebecca Eng at Transpower (09 590 7072), or on the following email: environment.policy@transpower.co.nz.

Yours faithfully



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⁸ **UFD – O1** Urban environments and built form support sustainable and resilient communities in Te Tai o Poutini/the West Coast.

⁹ **UFD – P1** Urban and environments and built form are attractive to residents, businesses and visitors through:

- a. identifying and maintaining the values of areas of special character and amenity in urban areas and settlements
- b. Supporting the economic viability and function of town centres
- c. Recognising the risk of natural hazards whereby new development is located in less hazardous locations
- d. Promoting the re-use and re-development of buildings and land, including private and public land
- e. Supporting inclusivity and housing choice for diversity in the community now and into the future.
- f. Improving overall accessibility and connectivity (including walking and cycling) for people, transport and services; and
- g. Promoting the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure and protection of regionally significant infrastructure from reverse sensitivity effects.
- h. maintaining the health and wellbeing of waterbodies, freshwater ecosystems and receiving environments
- i. Promoting the identification, recognition and protection of heritage resources which are significant to the character and identity of Te Tai o Poutini/the West Coast
- j. Supporting low environmental impact practices, materials and design during urban development
- k. Recognising Poutini Ngāi Tahu values as part of the urban environment.