

Submission by Transpower New Zealand Limited on Plan Change 26 to the Waipā District Plan

30 September 2022

Keeping the energy flowing



Waipā District Plan Plan Change Submission Form

RMA Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840
Phone: 0800 924 723 | Online: www.waipadc.govt.nz/planchanges | Email: districtplan@waipadc.govt.nz

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

COUNCIL USE ONLY	

Note: You must fill in **ALL** sections of this form.
Submissions close **5pm Friday, 30 September 2022**.

1. Submitter details	
Full name of submitter	Transpower New Zealand Limited
Contact name if different from above	Pauline Whitney
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We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

2. This is a submission on the following proposed plan change to the Waipā District Plan
Plan Change 26 – Residential Zone Intensification

3. Trade competition			
Select one	<input type="radio"/>	I could	gain an advantage in trade competition through this submission.
	<input checked="" type="radio"/>	I could not	
Select one	<input type="radio"/>	I am	directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
	<input type="radio"/>	I am not	

4. Attendance at Council hearing			
Select one	<input checked="" type="radio"/>	I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
	<input type="radio"/>	I do not	
If others make a similar submission, I will consider presenting a joint case with them at the hearing. <input type="radio"/> Yes			
<input checked="" type="radio"/> No			

5. The specific provisions of the plan change my submission relates to are: (give details)			
Select one	<input type="radio"/>	I SUPPORT	
	<input checked="" type="radio"/>	I SUPPORT IN PART	
Select one	<input type="radio"/>	I OPPOSE	

6. My submission is: (please include the reasons for your view)

See attached.

7. I seek the following decision/s from Council: (give precise details – e.g. what you would like the wording of a specific provision (or map) to be changed to)

See attached.

8. Signature of submitter (note: a signature is not required if you make your submission by electronic means, however please type your name below)

Signature of submitter: (or
person authorised to sign on
behalf of submitter)

Pauline Whitney

Dated 29/09/2022

Submission by Transpower New Zealand Limited on Plan Change 26 (August 2022) (Proposed Intensification Planning Instrument) to the Waipā District Plan (August 2020)

Submission Overview

The following is the submission from Transpower New Zealand Limited (“**Transpower**”) on Plan Change 26 (“**PC26**”) to the Operative Waipā District Plan (“**ODP**”), being the Intensification Planning Instrument (“**IPI**”) to:

- Incorporate the Medium Density Residential Standards (the “**MDRS**”) of the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 (“the **RMA**”),
- Give effect to Policies 3 and 4 of the National Policy Statement on Urban Development 2020 (“**NPS-UD**”); and
- Include objectives and policies in accordance with clause 6 to Schedule 3A of the RMA (s77G(5)).

The submission has been prepared to assist the Council in ensuring the planning framework under PC26 appropriately recognises and provides for the National Grid. Specifically, from Transpower’s perspective, the provisions of PC26 need to ensure that it:

- Gives effect to the National Policy Statement on Electricity Transmission 2008 (“**NPSET**” or “**NPS**”); and
- Recognises the National Grid as a qualifying matter in the implementation of the RMA.

The submission provides specific submission points (refer attached Table 1), with supporting information provided within **Appendix A** comprising an overview of Transpower, an outline of the National Grid assets within the city that are within the proposed intensification areas, the policy and rule framework for the National Grid within the operative district plan, and determination of the National Grid as a qualifying matter. A summary is provided below. Attached as **Appendix B** is a map of existing National Grid assets within Waipā District. **Appendix C** provides an assessment to support the incorporation of the National Grid Corridors as an existing qualifying matter in the IPI. **Appendix D** provides relevant Waikato Regional Policy Statement provisions, and **Appendix E** provides a map of the National Grid assets with the proposed PC26 zoning.

By way of summary, Transpower largely supports the proposed IPI. In particular Transpower supports:

- The identification of the National Grid within the IPI as a qualifying matter, and
- Inclusion of the ODP National Grid Corridor provisions within the IPI and ISPP process.

The amendments sought through the submission are confined in nature and include:

- Amendments to ensure consistency across the ODP and provide greater clarity, particularly in relation to the application of qualifying matters.
- Ensuring that the National Grid is correctly applied as a qualifying matter to the subdivision provisions applying in the Medium Density Residential Zone.

- Reconsideration of the changes proposed to Policies 2.3.7.5 and 15.3.15.5, and the replication of this policy in new Section 2A as 2A.3.9.5.

Background and Context

Transpower New Zealand

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users.

Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient District Plan where it may affect the National Grid. Specific to intensification, PC26 has the potential to significantly impact on the ability for Transpower to operate, maintain, upgrade and develop the existing electricity transmission network.

Statutory Framework

The National Policy Statement on Electricity Transmission 2008 ("**NPSET**") confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act ("**RMA**") duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid.

The one 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:

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District Plan to address and are of specific relevance to PC26.

National Grid Assets within Waipā District

Attached as **Appendix B** is a map of Transpower's assets within Waipā District. Those assets within the intensification areas subject to PC26 are shown in Figures 1 and 2 (and in **Appendix E**). Existing National Grid assets traverse the proposed Medium Density Residential Zone in Cambridge and Te Awamutu.



Figure 1. Existing National Grid assets (refer black dashed lines) and Plan Change 26 proposed Cambridge urban area

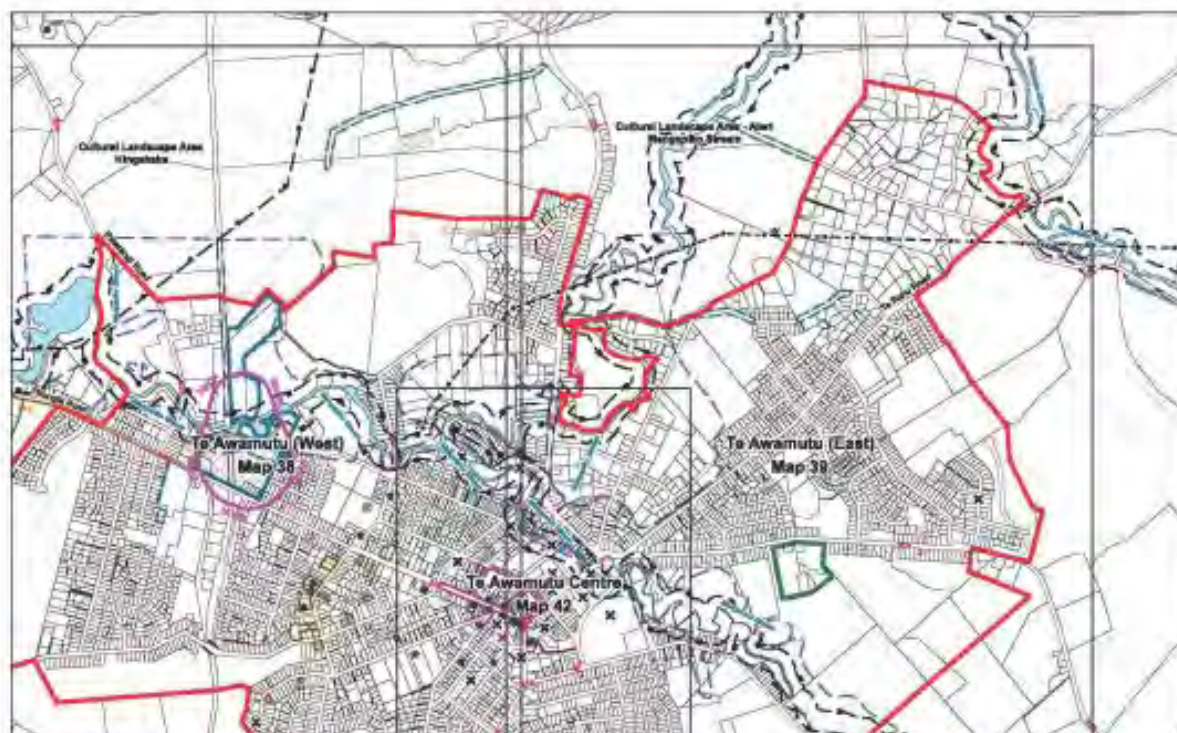


Figure 2. Existing National Grid assets (refer black dashed lines) and Plan Change 26 proposed Te Awamutu urban area

Specific National Grid Provisions within the Operative District Plan

The Operative District Plan contains a set of provisions relating to land use and subdivision within the defined areas specific to the National Grid high voltage transmission network, and for the purpose of this submission, these are referred to as the “National Grid Corridor”.

In summary, the National Grid Corridor approach comprises:

- A 10-12 metre wide National Grid Yard (as measured from the centreline of National Grid Lines or outer edge of a support structure) in which the establishment of a new, or change of use to, a National Grid Sensitive Activity (which includes a residential activity) is a non-complying activity under Rule 2.4.1.5(j).
- A restricted discretionary consent pathway (Rule 15.4.2.29) for subdivision, where a building platform for the principal dwelling, and any proposed secondary dwelling is identified, outside of the National Grid Yard, defaulting to non-complying where it is not available.

Plan Change 26 to the District Plan (August 2022)

PC26 proposes to introduce a new Medium Density Residential Zone (MRZ), with the framework contained in a new Section 2A of the ODP, and apply this zone to areas within Cambridge, Kihikihi and Te Awamutu. In relation to the National Grid, PC26 to the ODP also includes modifications of the MDRS otherwise applying within the new zone, where a relevant qualifying matter applies. In terms of the National Grid, this involves retaining the existing National Grid Corridor approach including rules and activity status, which are contained in Section 2 (applying to the current Residential Zone) and Section 15 (Infrastructure, Hazards, development & Subdivision).

The National Grid as a Qualifying Matter

Sections 77I and 77O of the RMA provide that a specified territorial authority may make the MDRS and the relevant building height or density requirements under Policy 3 less enabling of development in relation to a qualifying matter. A qualifying matter is defined by section 77I and 77O of the RMA.

The National Grid Corridor rules framework clearly meets the definition of a qualifying matter as:

- It is a matter required to give effect to the NPSET being a national policy statement (other than the NPS-UD)¹;
- It is a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure²; and
- Provisions that restrict development in relation to the National Grid are included in the Operative District Plan.

Attached as **Appendix C** is an assessment (as required by section 77K(1)) to support the incorporation of the National Grid Corridors as an existing qualifying matter in the IPI.

Transpower's Feedback on the IPI

Transpower largely supports the proposed IPI. In particular Transpower supports:

- The identification of the National Grid within the IPI as a qualifying matter, and
- Retention of the ODP National Grid Corridor provisions applied as a qualifying matter.

The amendments sought through the submission are confined in nature and include:

- Amendments to ensure consistency across the ODP and provide greater clarity, particularly in relation to the application of qualifying matters.
- Ensuring that the National Grid is correctly applied as a qualifying matter to the subdivision provisions applying in the Medium Density Residential Zone.
- Reconsideration of the changes proposed to Policies 2.3.7.5 and 15.3.15.5, and the replication of this policy in new Section 2A as 2A.3.9.5.

Specific Submission Points

In addition to the general commentary above and that provided in the attached appendices (which for the avoidance of doubt, forms part of the Transpower submission in that it outlines additional reasoning for the specific relief sought in the following table), Table 1 provides specific submissions points.

Amendments sought through this submission are shown as ~~red strikethrough~~ and underline text. For the avoidance of doubt, all the points below include any consequential amendments.

¹ Resource Management Act 1991, s 77I(b) a matter required in order to give effect to a national policy statement (other than the NPS-UD) or the New Zealand Coastal Policy Statement 2010

² Resource Management Act 1991, s 77I(e) a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure

Table 1 – Specific Submission points on the Plan Change 26
Provisions to be processed under the ISPP planning process

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
Definitions			
Qualifying Matter			
<i>As defined in section 771 or section 770 of the ACT.</i>	Support	Transpower supports the definition of ‘qualifying matter’ as it highlights to plan users the existence of the matters.	Retain definition.
Section 1 – Strategic Policy Framework			
1.3 Objectives and Policies			
Objective – Settlement Pattern			
<i>Policy – Towns</i> <i>1.3.1-22.2</i> ... <i>(b) To provide for medium density residential development in relevant residential zones located within the urban environs of Cambridge, Kihikihi and Te Awamutu, except where qualifying matters require modification of the medium density residential standards.</i>	Support	Transpower supports the reference to Qualifying Matters as it assists in plan interpretation and gives effect to the RMA.	Retain the text that refers to ‘qualifying matters’.
Section 2 – Residential Zone			
2.1 Introduction			
<i>2.1.5 A number of National Grid transmission lines traverse the Residential Zone of Waipā District. The subdivision, use and development of land is controlled within a defined National Grid Corridor to ensure potential adverse effects are appropriately addressed. The greatest level of restriction on landowners is within the National Grid Yard (particularly the support structures) which is the area that is closest to the transmission line and where there is the greatest potential for adverse effects to occur. The restrictions recognise that the greatest potential effects are generated by sensitive activities and intensive development. Notwithstanding such restrictions, Any lawfully established activities within the National Grid Corridor can are able to continue as long as they meet the criteria for existing use rights in the Resource Management Act 1991 or are a permitted activity.</i>	Support	Transpower supports retention of the introductory paragraph outlining that there are National Grid transmission lines which traverse those areas which remain in the Residential Zone. Transpower is neutral on the minor amendments proposed.	Retain 2.1.5

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
Objective – National Grid transmission networks			
<p><i>Policies - Management of activities within National Grid Corridors</i></p> <p>2.3.7.5 To not exclude foreclose operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.</p>	Amend	<p>Transpower queries the necessity of this change and considers that it is unclear how the change arises as a consequence of implementing the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021. In the event that the wording is changed, Transpower considers it is appropriate to amend the policy to better align with the NPSET (particularly Policies 2 & 5), by removing the phrase “to the extent practicable”; and using the word “compromise” rather than “exclude”, as this is consistent with the wording used in the NPSET (Policy 10).</p>	<p>Retain Policy 2.3.7.5 without amendment, or amend as follows:</p> <p>2.3.7.5 To not exclude foreclose operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.</p>
2.4 Rules			
Rules - Earthworks			
<p>2.4.2.36 Any earthworks within a National Grid Yard must:</p> <p>(a) Around ... Provided that Vertical holes not exceeding 500mm in diameter beyond 1.5m from the outer edge of pole support structure or stay wire are exempt from Rule 2.4.2.36-27(a) above.</p> <p>(b) Around ... Provided that The following are exempt from Rule 2.4.2.36-27(a) and (b) above:</p> <p>(i) Earthworks undertaken by a network utility operator; or</p> <p>(ii) Earthworks undertaken as part of agricultural or domestic cultivation, or repair, sealing or resealing of a road, footpath, driveway or farm track</p>	Amend	<p>Transpower supports retention of the earthworks rule within the Residential Zone.</p> <p>While Transpower is neutral on the minor amendments proposed, it queries the necessity of this change and considers that it is unclear how the change arises as a consequence of implementing the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021. Transpower also notes that the proposed change to numbering of references within the rule (i.e. to 27) do not align with the numbering of the rule, which is shown as retained (i.e. 36); and that the changes are not consistent with the rule proposed in the MRZ (i.e. Rule 2A.4.2.47 still includes “Provided that”).</p>	<p>Retain Rule 2.4.2.36, but ensure the references within the rules align with the numbering of the rule itself, and that the drafting is consistent with Rule 2A.4.2.47.</p>

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
Section 2A – Medium Density Residential Zone			
2A.1 Introduction			
<p><u>2A.1.1 The Medium Density Residential Zone of the District is where most people in Waipā live. It is principally located in Waipā's Urban Areas comprising the two main towns of Cambridge and Te Awamutu, together with Kihikihi as a functional part of the Te Awamutu Urban Area. The density of this zone is expected to be a minimum of twenty-five to thirty-five dwellings per hectare (net once public spaces and infrastructure have been provided for)...</u></p> <p><u>2A.1.3 In order to comply with national direction to provide for sufficient development opportunity to meet existing and future demand for residential development, this Plan provides for new growth areas (refer to Section 1 - Strategic Policy Framework) as well as greater density of development within the Medium Density Residential Zone.</u></p> <p><u>2A.1.4 The Medium Density Residential Zone applies to land in Cambridge, Te Awamutu and Kihikihi. The Medium Density Residential Standards set out in Schedule 3A of the Act have been incorporated in this zone, with modifications where necessary to accommodate qualifying matters...</u></p> <p><u>2A.1.6 In addition to a range of living options, working from home is provided for through the home occupation provisions. Other sections of the Plan are also relevant and will need to be referred to for particular developments, including Section 15 - Infrastructure, Hazards, Development and Subdivision and Section 16 - Transportation.</u></p>	Support	<p>Transpower supports the reference in 2A.1.4 to Qualifying Matters as it assists in plan interpretation and gives effect to the RMA.</p> <p>Transpower also support reference to the relevance of Section 15, being the section where the National Grid Corridor as a qualifying matter is applied to subdivision.</p>	Retain the introduction.
<u>Qualifying Matters – Introduction</u>			
<p><u>2A.1.9 The Medium Density Residential Standards have been modified to accommodate qualifying matters in the Waipā District in the following circumstances:</u></p> <p>(a) <u>Where there are existing constraints on infrastructure capacity meaning that increased density of development could lead to adverse effects on the Waikato and Waipā Rivers and their catchment which is in conflict with the Vision, Objectives and Strategies of Te Ture Whaimānā;</u></p> <p>(b) <u>Where there is a risk that degradation of freshwater bodies could occur and that the fundamental concept of Te Mana o te Wai as set out in the National Policy Statement for Freshwater Management 2020 would not be able to be achieved;</u></p> <p>(c) <u>Where cultural, historic or special character related values are present and could be lost through uncontrolled development;</u></p>	Support	<p>Transpower supports there being explicit guidance in this section about the circumstances in which qualifying matters have been applied. This provides greater clarity for plan users.</p>	Retain 2A.1.9

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
<p>(d) <u>Where outstanding natural features and landscapes are present and may be adversely affected by inappropriate subdivision, use and development;</u></p> <p>(e) <u>Where it is necessary to protect public open spaces and significant natural areas to ensure that there are public and open green spaces available for use by communities to meet their needs;</u></p> <p>(f) <u>Where it is necessary to maintain and enhance public access to and along lakes and rivers;</u></p> <p>(g) <u>Where it is necessary to control subdivision and development to manage significant risks from natural hazards;</u></p> <p>(h) <u>Where sites are located proximate to nationally significant infrastructure, such as the National Grid transmission lines, state highways and the North Island Main Trunk railway line; and</u></p> <p>(i) <u>Where there are specific matters which make higher density inappropriate such as protected trees, character clusters and specific requirements applying within Structure Plans.</u></p>			
Qualifying Matters – Nationally Significant Infrastructure			
<p><u>2A.1.24 Provisions in the Waipā Operative District Plan related to building in relation to the National Grid transmission network, the state highway roading network and the North Island Main Trunk railway are qualifying matters by virtue of section 77(I)(b) of the Act being a matter required to give effect to a National Policy Statement and section 77(I)(e) being a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.</u></p> <p><u>2A.1.25 The relevant national policy statement is the National Policy Statement for Electricity Transmission 2008. It sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.</u></p> <p><u>2A.1.26 It is recognised that the efficient transmission of electricity on the national grid plays a vital role in the wellbeing of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act.</u></p> <p><u>2A.1.27 Several National Grid transmission lines traverse the Waipā District. The subdivision, use and development of land is controlled within a defined National Grid Corridor to ensure potential adverse effects are appropriately addressed. The greatest level of restriction on landowners is within the National Grid Yard (particularly the support structures) which is the area that is closest to the transmission line and where there is the greatest potential for adverse effects to occur. The restrictions recognise that the greatest potential effects are generated by sensitive activities and intensive development. For this reason, the National Grid has been identified as a qualifying matter to the Medium Density Residential Standards.</u></p>	Amend	<p>Transpower supports the introduction section being explicit about the National Grid being a qualifying matter. This ensures that the relationship between the MDRS and the limitations on development within the National Grid Yard, are clear.</p> <p>Minor amendments are sought to provide greater clarity and better align with the NPSET. This includes being clear that the NPSET directs management of both the effects of the National Grid, as well as effects of activities on the National Grid, including 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.</p>	<p>Retain 2A.1.24 – 2A1.29.</p> <p>Amend 2A.2.25 as follows:</p> <p><u>2A.1.25 Specific to electricity transmission, the relevant national policy statement is the National Policy Statement for Electricity Transmission 2008. It sets out the objective and policies to enable which direct the management of the effects of and on the electricity transmission network under the Resource Management Act 1991.</u></p> <p>...</p> <p><u>2A.1.27 Several National Grid transmission lines traverse the Waipā District. The subdivision, use and development of land is</u></p>

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
<p><u>2A.1.28 National Grid transmission lines for the transmission of electricity are considered to be a resource of national and regional significance that require protection. The location of activities within National Grid Corridors have the potential to result in adverse effects, including reverse sensitivity effects, on the operation, maintenance, upgrading and future development of the National Grid network and result in sensitive activities locating where they are most vulnerable to the effects, including risks, associated with the line.</u></p> <p><u>2A.1.29 The management of subdivision within the National Grid Corridor is addressed in Section 15 - Infrastructure, Hazards, Development and Subdivision.</u></p>			<p><u>controlled managed within a defined National Grid Corridor to ensure potential adverse effects are appropriately addressed. The greatest level of restriction on landowners is within the National Grid Yard (particularly the support structures) which is the area that is closest to the transmission line and where there is the greatest potential for adverse effects to occur and for the National Grid to be compromised. The restrictions recognise that the greatest potential effects are generated by sensitive activities and intensive development. For this reason, the National Grid has been identified as a qualifying matter to the Medium Density Residential Standards.</u></p>
2A.3 Objectives and Policies			
Objectives – Medium Density Residential Standards			
<u>2A.3.1 A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</u>	Support	Transpower supports the objective, and in particular the recognition of wellbeing and health and safety. The objective reflects Schedule 3A, Part 1, clause (6)(1)(a) of the RMA.	Retain Objective 2A.3.1.
<u>2A.3.2 A relevant residential zone provides for a variety of housing types and sizes that respond to:</u> <u>(a) Housing needs and demand; and</u> <u>(b) The neighbourhood's planned urban built character, including 3-storey buildings.</u>	Amend	Transpower generally supports the objective, noting it reflects Schedule 3A, Part 1, clause (6)(1)(b) of the RMA.	Amend Objective 2A.3.2 as follows:

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
		However, given the “relevant residential zone” within the ODP is the Medium Density Residential Zone, it is more appropriate for the objective to explicitly refer to this zone, so that it clear within the Plan how this part of Schedule 3A is implemented within this particular plan.	2A.3.2 A relevant residential zone <u>The Medium Density Residential Zone provides for a variety of housing types and sizes that respond to:</u> <u>(a) Housing needs and demand;</u> <u>and</u> <u>(b) The neighbourhood’s planned urban built character, including 3-storey buildings.</u>
<u>2A.3.2.1 To enable a variety of housing typologies with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments.</u>	Support	Transpower generally supports the policy, noting that it reflects Schedule 3A Part 1, clause (6)(2)(a) of the RMA. However, within the MRZ, existing qualifying matters may limit the amount of permitted development possible on an allotment. Transpower therefore considers that there is a need to reference qualifying matters, as they directly influence the capacity for intensification and residential development. Rather than amending this policy to do so, Transpower seeks changes to Policy 2A.3.2.4 to achieve this.	Retain Policy 2A.3.2.1, subject to amendments being made to Policy 2A.3.2.4.
<u>2A.3.2.2 To enable a minimum target density of twenty-five to thirty-five dwellings per hectare (net after taking into account public spaces and infrastructure).</u>	Support	Transpower generally supports the policy, but notes that the application of qualifying matters may mean that the target density is not able to be achieved in some areas. Rather than amending this policy to address this, Transpower seeks changes to Policy 2A.3.2.4.	Retain Policy 2A.3.2.2, subject to amendments being made to Policy 2A.3.2.4.
<u>2A.3.2.3 To apply the Medium Density Residential Standards across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).</u>	Amend	Transpower generally supports the policy, but notes that the application of qualifying matters may mean that the target density is not able to be achieved in some areas. Rather than amending this policy to address this, Transpower seeks changes to Policy 2A.3.2.4. Similar to the above, given the “relevant residential zones” within the ODP are limited to the MRZ, it is	Amend Policy 2A.3.2.2, as follows, and subject to amendments being made to Policy 2A.3.2.4: <u>2A.3.2.3 To apply the Medium Density Residential Standards across all relevant residential zones in the district plan the</u>

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
		more appropriate for the policy to explicitly refer to this zone, so that it is clear within the Plan how this part of Schedule 3A is implemented within this particular plan.	<u>Medium Density Residential Zone, except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).</u>
<u>2A.3.2.4 To enable the modification of the Medium Density Residential Standards under Policy 2A.3.2.3 only to the extent necessary to accommodate a qualifying matter applying to that site.</u>	Amend	<p>Transpower supports the intent of this policy as it makes it clear that there are qualifying matters which affect the application of the MDRS.</p> <p>However, as noted above, Transpower consider that the application of qualifying matters is also relevant to the direction in Policies 2A.3.2.1, 2A.3.2.2 and 2A.3.2.3. Transpower therefore seeks changes to reflect this. Transpower also considers that the use of the direction “enable” in this context is potentially confusing, given the policy is essentially about limitations.</p>	<p>Amend Policy 2A.3.2.4 as follows:</p> <p><u>To enable the modification of modify the Medium Density Residential Standards under Policy 2A.3.2.3, or the level of density anticipated under Policies 2A.3.2.1, 2A.3.2.2 and 2A.3.2.3, only to the extent necessary to accommodate a qualifying matter applying to that site.</u></p>
<u>2A.3.4.4 The height of new buildings shall not be consistent with the Medium Density Residential Standards unless a qualifying matter applies.</u>	Support	Transpower supports the policy explicitly noting that height may be limited by a qualifying matter.	Retain Policy 2A.3.4.4
Objective – National Grid transmission networks			
<u>2A.3.9 To recognise and provide for the ongoing operation, maintenance and development of the National Grid electricity transmission network.</u>	Amend	<p>Transpower notes that the Objective is consistent with Objective 2.3.7, being the Objective that applies to what is currently the Residential Zone.</p> <p>Transpower supports the objective being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.</p>	<p>Amend Objective 2A.3.9 as follows:</p> <p><u>To recognise and provide for the ongoing operation, maintenance, upgrade and development of the National</u></p>

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
		However, Transpower seeks that the objective also refers to upgrading, for consistency with the NPSET Policy 2, and to align with the wording used in Policy 2.3.7.3.	<u>Grid electricity transmission network.</u>
<u>2A.3.9.1 To recognise the importance of the National Grid network in enabling communities to provide for their economic and social well-being and to provide for the ongoing operation, maintenance and development of the Grid through the management of activities within identified setbacks and corridors.</u>	Support	Transpower notes that the policy is consistent with Policy 2.3.7.1, which applies to what is currently the Residential Zone. Transpower supports the policy being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.	Retain Policy 2A.3.9.1.
<u>2A.3.9.2 To ensure safe and efficient use and development of the National Grid and to protect the National Grid from the adverse effects of activities adjacent to it.</u>	Support	Transpower notes that the policy is consistent with Policy 2.3.7.2, which applies to what is currently the Residential Zone. Transpower supports the policy being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.	Retain Policy 2A.3.9.2.
<u>2A.3.9.3 To avoid inappropriate land use and development within the National Grid Yard to ensure that the operation, maintenance, upgrading and development of the electricity transmission network is not compromised and to minimise the potential for nuisance effects.</u>	Support	Transpower notes that the policy is consistent with Policy 2.3.7.3, which applies to what is currently the Residential Zone. Transpower supports the policy being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.	Retain Policy 2A.3.9.3.
<u>2A.3.9.4 To avoid the establishment of new sensitive activities within the National Grid Yard in order to minimise adverse effects on and from the National Grid, including adverse effects on health and safety, amenity and nuisance effects, and reverse sensitivity effects.</u>	Support	Transpower notes that the policy is consistent with Policy 2.3.7.4, which applies to what is currently the Residential Zone. Transpower supports the policy being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.	Retain Policy 2A.3.9.4.

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
<u>2A.3.9.5 To not exclude operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.</u>	Amend	<p>Transpower notes that the policy is largely consistent with Policy 2.3.7.5, which applies to what is currently the Residential Zone. Transpower supports the policy being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential, but considers it is appropriate to amend the policy to better align with the NPSET (particularly Policies 2 & 5), by removing the phrase “to the extent practicable”.</p> <p>Transpower also notes that the current policy uses the word “foreclose” rather than “exclude” and Transpower queries the necessity of this change. In the event that the wording is changed, Transpower considers that the word “compromise” would be more appropriate than “exclude”, as this is consistent with the wording used in the NPSET (Policy 10).</p>	<p>Amend Policy 2A.3.9.5 as follows:</p> <p><u>To not compromise exclude operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.</u></p>
2A.4.1 Activity Status Tables			
2A.4.1.1 Permitted Activities			
<u>(o) Earthworks within the National Grid Yard that comply with Rule 2A.4.2.48.</u>	Support	Transpower notes that the rule is consistent with Rule 2.4.1.1(p), which applies to what is currently the Residential Zone. Transpower supports the rule being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.	Retain Rule 2A.4.1.1 (o).
2A.4.1.5 Non-complying activities			
<u>(h) Within the National Grid Yard:</u> <u>(i) Any building or addition to a building for a National Grid Sensitive Activity.</u>	Support	Transpower notes that the rule is largely consistent with Rule 2.4.1.5(j), which applies to what is currently the Residential Zone. Transpower supports	Amend Rule 2A.4.1.5(h)(iii) as follows:

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
<p><u>(ii) Any change of use to a National Grid Sensitive Activity or the establishment of a new National Grid Sensitive Activity.</u></p> <p><u>(iii) Any building, structure or earthworks which fail to comply with Rules 2A.4.2.47 and 2A.4.2.48.</u></p>		<p>the rule being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.</p> <p>This also ensures that the relevant provisions within the ODP applying to the National Grid Yard are applied within PC26 as a qualifying matter.</p> <p>However, Transpower note that it is necessary that the rule refers to all relevant National Grid Yard performance standards, including 2A.4.2.49 (consistent with Rule 2.4.1.5(j) and the reference in 2A.4.2.49 itself).</p>	<p><u>(iii) Any building, structure or earthworks which fail to comply with Rules 2A.4.2.47, and 2A.4.2.48 and 2A.4.2.49.</u></p>
2A.4.2 Performance Standards			
<p><u>2A.4.2.47 Any earthworks within a National Grid Yard must:</u></p> <p><u>(a) Around National Grid pole support structures:</u></p> <p><u>(i) Be no deeper than 300mm within 2.2m of a National Grid pole support structure or stay wire; and</u></p> <p><u>(ii) Be no deeper than 750mm between 2.2m to 5m from a National Grid pole support structure or stay wire.</u></p> <p><u>Provided that vertical holes not exceeding 500mm in diameter beyond 1.5m from the outer edge of pole support structure or stay wire are exempt from Rule 2.4.2.47(a) above.</u></p> <p><u>(b) Around National Grid tower support structures:</u></p> <p><u>(i) Be no deeper than 300mm within 6m of the outer visible edge of a National Grid tower; and</u></p> <p><u>(ii) Be no deeper than 3m between 6m to 12m from the outer visible edge of a National Grid tower.</u></p> <p><u>(c) Anywhere within the National Grid Yard:</u></p> <p><u>(i) Not create an unstable batter that will affect a transmission support structure; and</u></p> <p><u>(ii) Not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 of NZECP34.</u></p> <p><u>Provided that the following are exempt from Rule 2A.4.2.47(a) and (b) above:</u></p> <p><u>(i) Earthworks undertaken by a network utility operator; or</u></p>	Support	<p>Transpower notes that the rule is consistent with Rule 2.4.2.36, which applies to what is currently the Residential Zone. Transpower supports the rule being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.</p> <p>As a minor point, Transpower notes that slight drafting changes are proposed through PC26 to the drafting of Rule 2.4.2.36, and while Transpower is neutral on the changes, it seeks that the rules are worded consistently in both chapters.</p>	Retain Rule 2A.4.2.47

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
<p><u>(ii) Earthworks undertaken as part of agricultural or domestic cultivation, or repair, sealing or resealing of a road, footpath, driveway or farm track.</u></p> <p><u>Activities that fail to comply with this rule will require a resource consent for a non-complying activity.</u></p>			
<p><u>2A.4.2.48 Buildings and structures within the National Grid Yard are permitted if they meet the following:</u></p> <p><u>(a) On existing sites within the urban limits as at 30 May 2014:</u></p> <p><u>(i) Are an accessory building for a National Grid Sensitive Activity; and/or</u></p> <p><u>(ii) Are internal alterations to a building used for a National Grid Sensitive Activity that do not extend the building footprint, or increase the height of the building; and/or</u></p> <p><u>(iii) Are a building not associated with a National Grid Sensitive Activity.</u></p> <p><u>(b) On all sites within any part of the National Grid Yard, any buildings and structures must:</u></p> <p><u>(i) Be permitted by Rule 2.4.2.37(a) above; and/or</u></p> <p><u>(ii) Be a fence; and/or</u></p> <p><u>(iii) Be network utilities within a transport corridor or any part of electricity infrastructure that connects to the National Grid; and/or</u></p> <p><u>(iv) Be any public sign required by law or provided by any statutory body in accordance with its powers under any Act.</u></p> <p><u>(c) All buildings and structures permitted by Rule 2A.4.2.48(a) and (b) must comply with at least one of the following:</u></p> <p><u>(i) Have a minimum vertical clearance of 10m below the lowest point of the conductor associated with National Grid lines (refer diagram below); or</u></p> <p><u>(ii) Demonstrate that safe electrical clearance distances are maintained under all National Grid line operating conditions.</u></p> <p><u>Activities that fail to comply with this rule will require a resource consent for a non-complying activity.</u></p>	Support	<p>Transpower notes that the rule is consistent with Rule 2.4.2.37, which applies to what is currently the Residential Zone. Transpower supports the rule being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.</p> <p>This also ensures that the relevant provisions within the ODP applying to the National Grid Yard are applied within PC26 as a qualifying matter.</p>	Retain Rule 2A.4.2.48.
<p><u>2A.4.2.49 Buildings and structures around the National Grid Support Structures shall be setback a minimum of 12m from a National Grid Support Structure, provided that the following buildings and structures are exempt from this rule:</u></p> <p><u>(a) Network utility within a transport corridor or any part of electricity infrastructure that connects to the national grid; or</u></p> <p><u>(b) A fence more than 5m from the nearest National Grid Support Structure.</u></p> <p><u>Activities that fail to comply with this rule will require a resource consent for a non-complying activity.</u></p>	Support	<p>Transpower notes that the rule is consistent with Rule 2.4.2.38, which applies to what is currently the Residential Zone. Transpower supports the rule being carried over to those parts of the current Residential Zone which are proposed through PC26 to be zoned Medium Density Residential.</p> <p>This also ensures that the relevant provisions within the ODP applying to the National Grid Yard are applied within PC26 as a qualifying matter.</p>	Retain Rule 2A.4.2.49.

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
Section 15 – Infrastructure, Hazards, Development & Subdivision			
15.3 Objectives			
Objective – National Grid transmission networks			
<i>Policies - Management of activities within National Grid Corridors</i> 15.3.15.5 To not foreclose <u>exclude</u> operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.	Amend	Transpower queries the necessity of this change and considers that is unclear how the change arises as a consequence of implementing the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021. In the event that the wording is changed, Transpower considers it is appropriate to amend the policy to better align with the NPSET (particularly Policies 2 & 5), by removing the phrase “to the extent practicable”; and using the word “compromise” rather than “exclude”, as this is consistent with the wording used in the NPSET (Policy 10).	Retain Policy 15.3.15.5 without amendment, or amend as follows: To not <u>compromise</u> exclude foreclose operation or maintenance options or, to the extent practicable , the carrying out of routine and planned upgrade works.
15.4 Rules			
15.4.1 Activity Status Table			
15.4.1.1(e) Subdivision that meets all the performance rules in Part A OR; Part A and Part C for 7 or more lots.	Amend	Transpower supports the requirement for subdivision in the MRZ to meet the performance rules in Part A. This includes Rule 15.4.2.29, which requires that all lots must identify a building platform for the principal dwelling, and any proposed secondary dwelling, outside of the National Grid Yard. Where this is not met the subdivision defaults to a non-complying activity. This aligns with the land use rules applying within the National Grid Yard.	Amend Rule 15.4.1.1(e) matters of discretion as follows: <i>Effects on the National Grid electricity transmission network within the Rural Zone, Residential Zone, <u>Medium Density Residential Zone</u>, Large Lot Residential Zone and Reserves Zone.</i>

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
		<p>Transpower also notes that the activity status proposed for subdivision within the MRZ is restricted discretionary. Notwithstanding this, Transpower notes that under Clause (e), reference in relation to the MRZ refers to matters of control, indicating the activity status may have been intended to be controlled. Where a qualifying matter does not apply, a controlled activity status would also appear to be consistent with the direction in Schedule 3A, Clause 7. Transpower therefore questions if it was intended that the activity status applied within the MRZ would be controlled.</p> <p>If it was intended that subdivision within the MRZ meeting Part A would be controlled, then for the avoidance of doubt, Transpower seeks that any subdivision within the defined National Grid Corridor within this zone is explicitly listed as a restricted discretionary activity. Transpower is neutral as to whether subdivision within the MRZ, which is located outside the National Grid Corridor, is a controlled or restricted discretionary activity.</p> <p>Transpower considers that it is appropriate for subdivision within the National Grid Corridor to be a restricted discretionary activity, because subdivision provides the framework for future land use, and if poorly configured, can prevent access to the National Grid for maintenance and result in new allotments that cannot be safely built on. This extends beyond just the location of buildings within the Yard. This Corridor and the associated provisions enable Transpower to be recognised as an affected party that needs to be notified of, and consulted with on, any application. Once part of the consenting process, Transpower is then able to provide specialist technical and engineering input relating to</p>	<p>If Rule 15.4.1.1(e) is amended so that that subdivision in the Medium Density Residential Zone is a controlled activity, include a new rule, or amend clause (e), so that subdivision within the National Grid Corridor is a restricted discretionary activity, with matters of discretion including <i>“effects on the National Grid electricity transmission network.”</i></p>

Specific Part/ Plan Provision	Support/ Oppose/ Amend	Reasoning	Relief Sought
		<p>the safe location of housing, including construction methodology. The restricted discretionary status, with matters of discretion allowing for consideration of <i>“Effects on the National Grid electricity transmission network”</i> allows for this input and consideration.</p> <p>If the activity status of subdivision within the MRZ under clause (e) is retained as restricted discretionary, it is necessary to amend the matter of discretion to refer to the MRZ; without this reference, the National Grid will not have effectively been applied as a qualifying matter.</p> <p>If the activity status of subdivision within the MRZ under clause (e) is amended to a controlled activity, then Transpower seeks that the rules are amended so that this excludes any subdivision within the National Grid Corridor. This ensures that the qualifying matter is appropriately applied and is consistent with the approach taken to subdivision in the National Grid Corridor in the IPI of other district plans, including Hamilton and Waikato.</p>	
<p><u>Medium Density Residential Zone – Specific activity status rules</u></p> <p><u>(l) Subdivision around either existing (implemented or approved) dwellings or proposed dwellings where the subdivision application is accompanied by a land use application that will be determined concurrently.</u></p>	Amend	<p>Transpower do not support the controlled activity status proposed for this type of subdivision, without any consideration of the National Grid. As a minimum, Transpower consider that there is a need for the rule to be subject to compliance with Rule 15.4.2.29. However, for the reasons outlined above, Transpower’s preference is that subdivision within the defined National Grid Corridor is explicitly listed as a restricted discretionary activity, with matters of discretion allowing for consideration of <i>“Effects on the National Grid electricity transmission network ...”</i></p>	<p>Include a new rule, or amend clause (l), so that subdivision within the National Grid Corridor is a restricted discretionary activity, with matters of discretion including <i>“effects on the National Grid electricity transmission network.”</i></p>

Section 32 Evaluation Report

4.3 Issues 3 - Qualifying matters and modifications to the Medium Density Residential Standards

4.3.4. Waipā District Council has identified and applied the following qualifying matters for Plan Change 26: ... (f) Where sites are located proximate to nationally significant infrastructure, such as the National Grid transmission lines and the North Island Main Trunk railway line (existing qualifying matter which is already provided for in the operative Waipā District Plan (s77I(e))).	Support	Although not forming part of the IPI, Transpower supports reference to the National Grid as a qualifying matter within the Section 32.	Retain the National Grid as a qualifying matter.
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Appendix 2 – Assessment of Existing Qualifying Matters

Table 1: Assessment of existing qualifying matters

Existing Qualifying Matter (s77K(c) of the Resource Management Act 1991)	Section	Rules	Location where the qualifying matter applies (s77K(a), Resource Management Act 1991)	Alternative density standards to be applied (s77K(b), Resource Management Act 1991)	Level of development prevented by the qualifying matter when compared to the level of development permitted by the MDRS1 and policy 3 (s77K(d), Resource Management Act 1991)			
National Grid Yard	Section 2 - Residential Zone	Rule 2.4.2.37 - Buildings and Structures in the National Grid Yard	Identified on planning maps across the Waipā District.	Additional standards that apply to buildings within the National Grid Yard. Standards include restrictions on the types of buildings and structures allowed within the National Grid Yard and the height of those buildings and structures.	Under Rule 2.4.2.37, activities require resource consent for a noncomplying activity if they do not meet the required standards. Building height will be restricted due to the requirement of a minimum vertical clearance of 10m below the lowest point of the conductor associated with the National Grid lines.	Support	Although not forming part of the IPI, Transpower generally supports the assessment. However, Transpower notes that the application of Rule 2.4.2.37 as a qualifying matter will also limit density of development within the National Grid Yard, as well as building height. As Rule 2.4.2.37, 2A.4.1.5 and 2A.4.2.48 do not permit residential buildings and structures, they are a non-complying activity.	N/A

National Grid Yard	Section 2 - Residential Zone	Rule 2.4.2.38 - Buildings and Structures in the National Grid Yard	Identified on planning maps across the Waipā District.	A 12 metre setback is required for buildings within the National Grid Yard except for: (a) Network utility within a transport corridor or any part of electricity infrastructure that connects to the national grid; or (b) A fence more than 5m from the nearest National Grid Support Structure.	Activities require resource consent for a non-complying activity if they do not meet the required standards. The required setback may limit the number of buildings and structures that could be located on a site.	Support	Although not forming part of the IPI, Transpower generally supports the assessment, noting that buildings and structures for residential activities are a non-complying activity under Rule 2.4.2.37, 2A4.1.5 and 2A.4.2.48.	N/A
National Grid Yard	Section 15 – Infrastructure, Natural Hazards, Development and Subdivision	Rule 15.4.1.1 (e) - Subdivision that meets all the performance rules in Part A OR; Part A and Part C for 7 or more lots	Identified on planning maps across the Waipā District.	Assessment criteria for restricted discretionary activities includes the effects of a subdivision on the National Grid electricity transmission network within the Rural Zone, Residential Zone, Large Lot Residential Zone, and Reserves Zone.	The assessment criteria have the ability to impact on location and bulk requirements.	Support in part	Transpower notes that the assessment criteria do not refer to the Medium Density Residential Zone. In order for the National Grid Corridor to be applied as a qualifying matter, it is necessary to apply this matter of discretion within the new zone.	Amend Rule 15.4.1.1(e) as set out above.
National Grid Yard	Section 21 – Assessment Criteria and Information Requirements	Rule 21.1.15.37 - All subdivision within the National Grid Corridor	Identified on planning maps across the Waipā District.	Restricted discretionary activity with assessment criteria focused on: (a) The extent to which the subdivision design avoids, remedies, or mitigates conflicts with existing lines e.g., the location and design of roads, reserves, landscaping and building platforms. (b) The ability for maintenance and inspection of transmission lines, including ensuring physical access. (c) The extent to which the design and development will minimise the risk or injury and/or property damage from such lines.	Potential impact on location of building platforms and ensuring access for the maintenance and inspection of transmissions lines.	Support	Although not forming part of the IPI, Transpower generally supports the assessment. However, as noted above, for these to be applied as a qualifying matter as intended, the rules need to be amended to refer to these matters applying within the Medium Density Residential Zone.	N/A

				<p><i>(d) The ability to provide a complying building (platform).</i></p> <p><i>(e) Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).</i></p> <p><i>(f) Relevant technical advice provided by the affected utility operator.</i></p>				
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Appendix A: Supporting information

Introduction to Transpower

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. The National Grid links electricity generators directly to major industrial users and distribution companies, feeding electricity to the local networks that distribute electricity to homes and businesses. The role of Transpower is shown in Figure 3 below. The National Grid comprises towers, poles, lines, cables substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of around 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

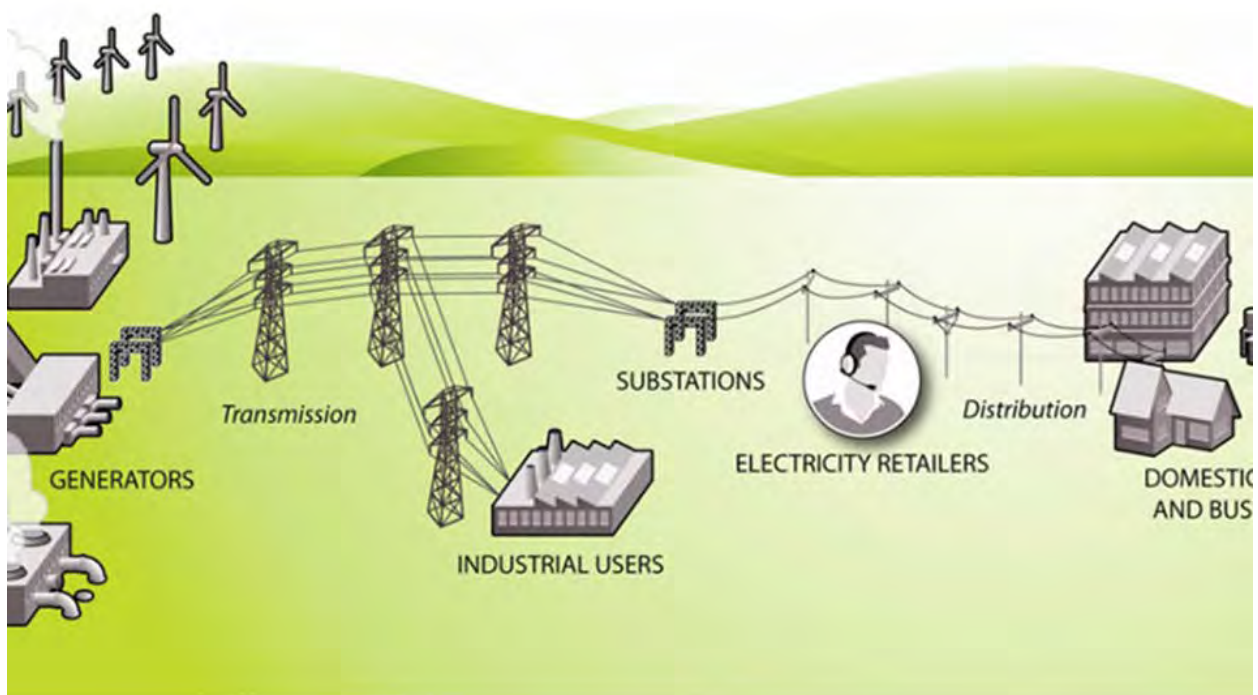


Figure 3. Role of Transpower in New Zealand's electricity industry (Source: MBIE)

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's role as outlined in its Statement of Corporate Intent for July 2022, states that:

Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users, and*
- As system operator, to operate a competitive electricity market and deliver a secure power system.*

In line with the above, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's "*Whakamana i Te Mauri Hiko*" predicts that electricity demand is likely to increase by around 55% by 2050. *Whakamana i Te Mauri Hiko* suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which the country's zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient District Plan where it may affect the National Grid. Housing intensification has the potential to significantly impact on the ability for Transpower to operate, maintain, upgrade and develop the existing electricity transmission network.

National Grid Assets within Waipā District

Within Waipā District the National Grid has the following lines:

- Huntly-Taumarunui A 220 kV double circuit transmission line on towers (HLY-TMN-A);
- Karapiro-Te Awamutu A 110 kV single circuit transmission line on pi-poles (KPO-TMU-A);
- Otahuhu-Whakamaru A 220 kV single circuit transmission line on towers (OTA-WKM-A);
- Otahuhu-Whakamaru B 220 kV single circuit transmission line on towers (OTA-WKM-B);
- Otahuhu-Whakamaru C 220 kV double circuit transmission line on towers (OTA-WKM-C);

- Brownhill-Whakamaru A 400 kV (capable) double circuit transmission line on towers (designated) (BHL-WHN-A);
- Arapuni-Ongarue A 110 kV single circuit transmission line on pi-poles (ARI-HAM-A);
- Arapuni-Ongarue B 110 kV single circuit transmission line on towers (ARI-HAM-B);
- Arapuni-Hamilton A 110 kV single circuit transmission line on poles (ARI-HAM-A);
- Arapuni-Hamilton B 110 kV double circuit transmission line on towers (ARI-HAM-B);
- Hinuera-Karapiro A 110 kV single circuit transmission line on pi-poles (HIN-KPO-A); and
- Hamilton-Karapiro A 110 kV double circuit transmission line on towers (part of which is underground through St Kilda Estate and is designated) (HAM-KPO-A).

Also included within Waipā District are the substations at Cambridge, Karapiro and Te Awamutu.

Attached as **Appendix A** is a map of Transpower's assets within Waipā District. Those assets within the intensification areas subject to PC26 are shown in Figure 4 and Figure 5 below (and in **Appendix E**). The existing ARI-HAM-A and ARI-HAM-B 110 kV transmission lines traverses the proposed Medium Density Residential Zone in Cambridge; and the KPO-TMU-A 110 kV transmission line traverses the proposed Medium Density Residential Zone in Te Awamutu.

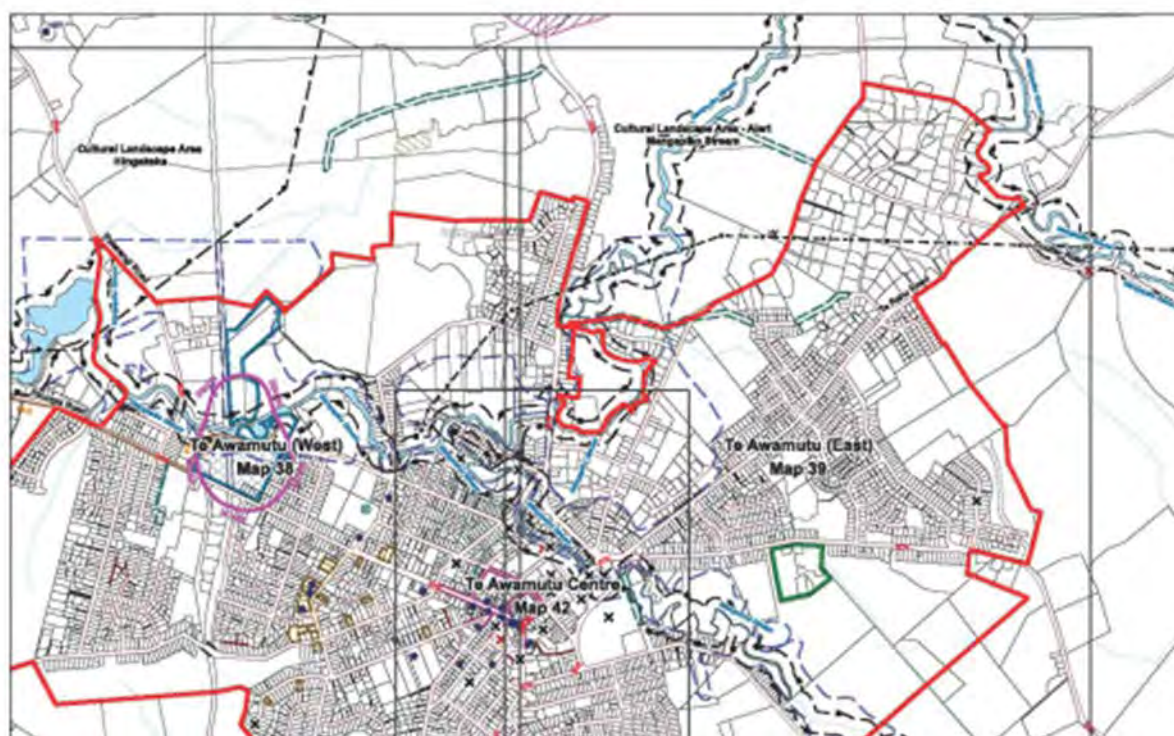


Figure 4. Existing National Grid assets (referred black dashed lines) and Plan Change 26 proposed Te Awamutu urban area



Figure 5. Existing National Grid assets (referred black dashed lines) and Plan Change 26 proposed Cambridge urban area.

Statutory Framework

National Policy Statement on Electricity Transmission

The National Policy Statement on Electricity Transmission 2008 (“NPSET”) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act (“RMA”) duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid. The NPSET only applies to the National Grid – the assets used or operated by Transpower – and not to electricity generation or distribution networks.

The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, councils have to work through how to make appropriate provision for the National Grid in their district/city plans, in order to give effect to the NPSET.

The one 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:

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District Plan to address, and are specifically relevant to PC26. Policy 10 is as follows:

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 relates to the development of buffer corridors, and is as follows:

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).

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Section 75(3)(a) of the RMA requires that district plans must 'give effect' to a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

Regional Policy Statement

Operative Regional Policy Statement

The Waikato Regional Policy Statement ('RPS') was made operative in 2016. Section 75(3)(c) of the RMA requires that a District Plan must give effect to any Regional Policy Statement (as well as any NPS).

Of relevance to the National Grid are Objectives 3.5 and 3.12 and supporting Policies 6.3 and 6.6. These are attached as **Appendix D**.

Objective 3.5 seeks to ensure that electricity transmission is operated, maintained, developed and upgraded, in a way that (amongst other matters) recognises and provides for the national significance, and national, regional and local benefits of electricity transmission, as well as recognising the technical and operational constraints of the electricity transmission network.

Objective 3.12 seeks that development of the built environment – which includes residential intensification - occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes. There are various ways listed as to how this occurs, and of relevance to PC26, includes *"integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors"* as well as *"recognising and protecting the value and long-term benefits of regionally significant infrastructure"*. It also directs that the potential for reverse sensitivity is minimised.

Policies 6.3 and 6.6 directs that management of the built environment ensures that: the efficient and effective functioning of infrastructure is maintained, and the ability to maintain and upgrade that infrastructure is retained; and that particular regard is given to protecting the effectiveness and efficiency of existing and planned regionally significant infrastructure, the benefits of the development and use of regionally significant infrastructure, (including recognising and providing for the particular benefits of electricity transmission) and the technical and operational requirements of the electricity transmission network.

The implementation methods associated with these policies direct that a corridor management approach is developed which recognises the benefits of the national electricity grid, identifies key transmission corridors in district plans and protects the corridor and electricity transmission network from inappropriate activities, as well as managing the adverse effects (including reverse sensitivity effects) of subdivision, use and development on the operation, maintenance, upgrading and development of the electricity transmission network.

The above objectives, policies and methods provide a clear directive to ensure that development does not compromise the National Grid, and that electricity transmission is appropriately recognised and provided for in plans. Transpower considers that the NPSET is

given effect to in the RPS and through the application of the current ODP provisions as a qualifying matter in PC26 (subject to the minor amendments sought by Transpower in its submission).

Operative District Plan National Grid Provisions

For the purpose of this submission, where referred to as a collective set of provisions relating to land use and subdivision within the defined areas specific to the National Grid high voltage transmission network, these are referred to as the “National Grid Corridors”. The National Grid Corridors comprise the (district plan defined) National Grid Yard and the National Grid Corridor.

Operative District Plan

The ODP includes land use and subdivision rules that regulate activities within a corridor around National Grid transmission lines and National Grid support structures.

The National Grid Transmission Lines and Structures are mapped. The National Grid network traverses a range of zones including the current Residential Zone.

Under Rule 2.4.1.5(j), it is a non-complying activity for any building or building addition for a National Grid Sensitive Activity within the National Grid Yard, or for the establishment of a new, or change of use to, a National Grid Sensitive Activity. The definition of a ‘National Grid Sensitive Activity’ includes residential activities. Under 2.4.2.38, buildings – which would include new residential units - must also be setback 12m from a National Grid Support Structure; failure to achieve this is also a non-complying activity under Rule 2.4.1.5(j). The National Grid Yard is, by definition the area located:

- 12m in any direction from the outer edge of a National Grid support structure;
- 10m either side of the centreline of an overhead 110 kV National Grid line on single poles; and
- 12m either side of the centreline of any overhead National Grid line on pi poles or towers.

Under Rule 15.4.2.29, it is a requirement for all lots to identify a building platform for the principal dwelling, and any proposed secondary dwelling, outside of the National Grid Yard. Non-compliance with this standard results in a non-complying activity status. Where this standard is complied with, consent is required as a restricted discretionary activity, with matters of discretion including consideration of effects on the National Grid electricity transmission network (under Rules 15.4.1.1(e), 15.4.1.1(k) and 15.4.1.1(l)).

The above rule framework is supported by the following policy framework (in both Section 2 and Section 15):

Objective - National Grid transmission networks

2.3.7 / 15.3.15 To recognise and provide for the ongoing operation, maintenance and development of the National Grid electricity transmission network.

Policies - Management of activities within National Grid Corridors

2.3.7.1 / 15.3.15.1 To recognise the importance of the National Grid network in enabling communities to provide for their economic and social well-being and to provide for the ongoing operation, maintenance and development of the Grid through the management of activities within identified setbacks and corridors.

2.3.7.2 / 15.3.15.2 To ensure safe and efficient use and development of the National Grid and to protect the National Grid from the adverse effects of activities adjacent to it.

2.3.7.3 / 15.3.15.3 To avoid inappropriate land use and development within the National Grid Yard to ensure that the operation, maintenance, upgrading and development of the electricity transmission network is not compromised and to minimise the potential for nuisance effects.

2.3.7.4 / 15.3.15.4 To avoid the establishment of new sensitive activities within the National Grid Yard in order to minimise adverse effects on and from the National Grid, including adverse effects on health and safety, amenity and nuisance effects, and reverse sensitivity effects.

2.3.7.5 / 15.3.15.5 To not foreclose operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.

15.3.15.6 To manage subdivision layout and design within National Grid Corridors to achieve the outcomes in Policies 15.3.15.1 to 15.3.15.5 above, and to facilitate good amenity and urban design outcomes.

In summary, the National Grid Corridor approach in the operative District Plan within urban areas comprises:

- A 10-12 metre wide National Grid Yard in which residential activities are a non-complying activity; and
- A restricted discretionary resource consent pathway for subdivision where a complying building platform is available outside the National Grid Yard, defaulting to non-complying where it is not available.

Plan Change 26 to the Proposed District Plan (August 2022)

PC26 proposes to introduce a new Medium Density Residential Zone, with the framework contained in a new Section 2A of the ODP, and apply this zone to areas within Cambridge, Kihikihi and Te Awamutu. In relation to the National Grid, PC26 to the ODP also includes modifications of the MDRS otherwise applying within the new zone, where a relevant qualifying matter applies. In terms of the National Grid, this involves retaining the existing National Grid Corridor approach including rules and activity status, which are contained in Section 2 (applying to the current Residential Zone) and Section 15 (Infrastructure, Hazards, Development and Subdivision).

The National Grid as a Qualifying Matter

Sections 77I and 77O of the Resource Management the RMA provides a specified territorial authority may make the MDRS and the relevant building height or density requirements under

Policy 3 less enabling of development in relation to a qualifying matter. A qualifying matter is defined by section 77I and 77O of the RMA.

The National Grid Corridor rules framework clearly meets the definition of a qualifying matter as:

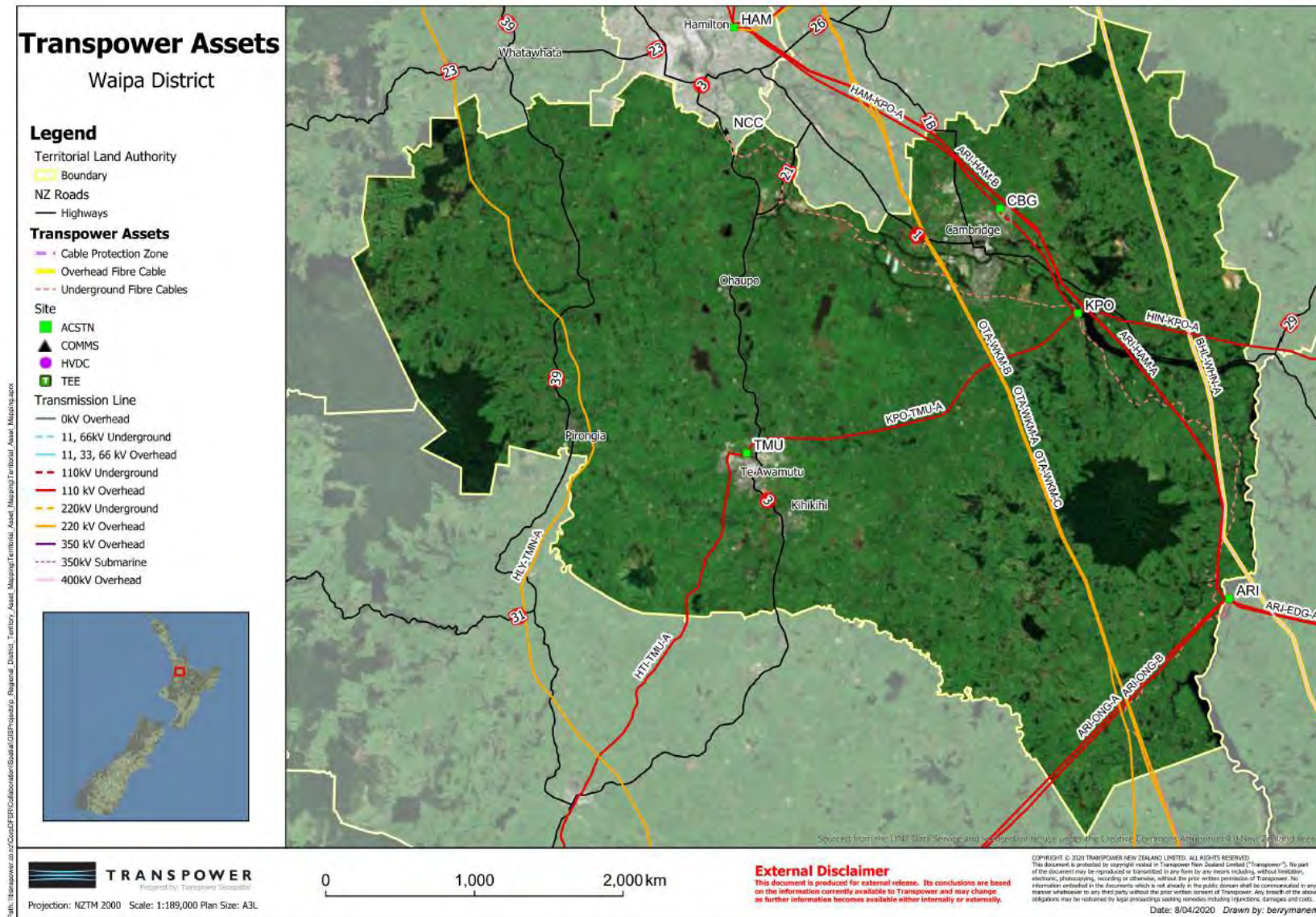
- It is a matter required to give effect to the NPSET being a national policy statement (other than the NPS-UD)³;
- It is a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure⁴; and
- Provisions that restrict development in relation to the National Grid are included in the Operative District Plan.

Attached as **Appendix C** is an assessment (as required by section 77K(1)) to support the incorporation of the National Grid Corridors as an existing qualifying matter in the IPI.

³ Resource Management Act 1991, s 77I(b) a matter required in order to give effect to a national policy statement (other than the NPS-UD) or the New Zealand Coastal Policy Statement 2010

⁴ Resource Management Act 1991, s 77I(e) a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure

Appendix B: Map of National Grid assets



Appendix C: Section 77K(1) Assessment

Process for Existing Qualifying Matters – Section 77K RMA

(a) Identify by location (for example, by mapping) where an existing qualifying matter applies

The National Grid transmission lines are clearly identified on the Operative District Plan planning maps. When read together with the rules for National Grid corridors, the planning maps identify, by location, where the qualifying matter will apply.

(b) Specify the alternative density standards proposed for those areas where an existing qualifying matter applies

Within the Operative Waipā District Plan, land use is managed within a defined 10-12 metre wide (as measured from the centreline of National Grid Lines or outer edge of a support structure) National Grid Yard. Subdivision is managed through a restricted discretionary consent pathway (provided that a building platform for the principal dwelling, and any proposed secondary dwelling is identified, outside of the National Grid Yard), which allows for consideration of the effects on the National Grid electricity transmission, defaulting to non-complying where a building platform is not available.

(c) Identify why the Council considers that one or more existing qualifying matters apply to the identified areas

The National Grid corridors are a qualifying matter as they:

- Are a matter required to give effect to the NPSET being a national policy statement (other than the NPS-UD); and
- Are a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.

Giving effect to the NPSET

The NPSET confirms the national significance of the National Grid and addresses its effects. Importantly, it also addresses effects on the National Grid including the activities of others (for example residential development) and requires that these do not compromise the operation, maintenance, upgrading and development of the National Grid.

The NPSET mandates a corridor for this protection. Specifically, Policy 11 of the NPSET requires that local authorities consult Transpower to identify an appropriate buffer corridor within which sensitive activities (such as residential development) will generally not be provided for in plans and/or granted resource consent. This outcome is appropriate and was tested through a comprehensive section 32 analysis undertaken by the Ministry for the Environment (when the NPSET was developed) and a Board of Inquiry hearing, and then subsequently through the section 32 assessment to include the National Grid corridors in the Operative Plan.

Ensuring the safe or efficient operation of nationally significant infrastructure

Development under and near high voltage transmission lines presents risks to the safe and efficient operation of the National Grid and needs to be managed carefully. It is critical that any development near the National Grid occurs in an appropriate and safe way. Transpower seeks to ensure that risks such as electrical shocks are minimised to the greatest extent

possible, access for vital maintenance and upgrade work is not constrained, and reverse sensitivity and direct effects are managed, so that its nationally significant infrastructure can continue to operate in the long-term, keeping the lights on across New Zealand.

Transpower is not opposed to residential development and understands the intent of the recent reforms to address issues with New Zealand's housing supply and affordability.

Transpower is working with developers and individuals across New Zealand on a daily basis in an effort to accommodate and support new development in a manner which takes the National Grid assets fully into account. If new land uses are properly designed and managed, effects on the safe and efficient operation of the National Grid can be reasonably managed.

Transpower prefers, wherever possible, to manage such risks and effects proactively. Proactive management through appropriate planning rules such as buffer corridors or setbacks is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid, and is consistent with the policy direction in the NPSET and the resulting buffer corridor approach within district plans throughout New Zealand.

While assisting Councils to give effect to the NPSET, the National Grid corridors protect the safe and efficient operation of the National Grid by:

- ensuring that sensitive activities such as residential development will generally not be provided for in close proximity to the lines;
- partially minimising the risk of inadvertent contact with the lines including the risk of flashovers (where an electrical discharge 'jumps' the air gap between an object and the line);
- helping to reduce nuisance impacts on landowners and subsequent complaints about the lines;
- partially protecting the lines from activities and development that could have direct or indirect effects on them;
- partially protecting access to the National Grid by ensuring development activities cannot occur close to the National Grid and prevent Transpower's access to it; and partially enabling efficient and safe operation, maintenance, upgrade and development of the lines.

Based on the above, it is submitted there is no ambiguity as to whether National Grid Corridors are qualifying matters. See, for example, the Report of the Environment Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill dated December 2021, which noted (emphasis added) at page 15: *"the qualifying matters set out in new section 77[1] include a matter of national importance and a matter required to ensure that nationally significant infrastructure operates safely or efficiently and avoid reverse sensitivity concerns. **This could include ensuring residential housing is safely set back from high voltage transmission lines, and other infrastructure such as airport noise areas, in order to avoid reverse sensitivity concerns**".*

Transpower considers it is not an efficient use of resources for the National Grid Corridor provisions to be relitigated as part of Council's incorporation of the Medium Density Residential Standards (MDRS).

(d) describe in general terms for a typical site in those areas identified under paragraph (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3

The costs to the community of limiting development within the National Grid Yard and National Grid Corridor is a reduced development yield. However, reduction is confined to the defined corridor width and needs to be assessed in context of the risks to the safe and efficient operation at a national and regional scale of the National Grid. However, the broader impacts of limiting development are significant and positive. In particular, the restrictions on development (which is confined to a defined corridor) provide for the safe and efficient operation of the National Grid, the benefits of which accrue beyond this area to the community as a whole.

Development in the National Grid Yard

The ODP provides for 'National Grid Sensitive Activities' as a non-complying activity within the National Grid Yard within the Residential Zone (being the residential zone affected by the IPI which the National Grid traverses within Waipā). This means that the level of development that would be prevented by the qualifying matter is likely to be all development.

While resource consent can technically be applied for, an applicant is unlikely to meet the threshold test in section 104D of the RMA. Residential density will in practice be zero (that is, development would be completely excluded). As explained above, this restriction on development in the National Grid Yard is justified by reference to Policy 10 of the NPSET which decision makers *"to 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"* and Policy 11 of the NPSET which requires that local authorities *"consult Transpower to identify an appropriate buffer corridor within which sensitive activities (such as residential development) will generally not be provided for in plans and/or given resource consent"*.

Development in the National Grid Corridor

Subdivision has the potential to significantly impact the National Grid. This is because subdivision provides the framework for future land use, and if poorly configured, can prevent access to the National Grid for maintenance and result in new allotments that cannot be safely built on.

As a result, subdivision within the ODP provides for consideration of *"Effects on the National Grid electricity transmission network"* within specified zones, including the current Residential Zone. This enables Transpower to be recognised as an affected party that needs to be notified of, and consulted with on, any application. Once part of the consenting process, Transpower is then able to provide specialist technical and engineering input relating to the safe location of housing, including construction methodology. Transpower has a team dedicated to this task, along with an online enquiry portal.

The level of development that may be prevented by consideration of effects on the National Grid network (as a qualifying matter) is therefore difficult to assess in the abstract – a case by case assessment is required to determine whether proposed development can be carried out safely and sufficient access to structures enabled. As explained above, in some areas of

the National Grid Corridor the MDRS will be appropriate and can be fully enabled (that is, there will be no impact on density at all), but in other areas limits on density will be necessary.

Appendix D: Relevant provisions from the Waikato Regional Policy Statement

Operative Regional Policy Statement 2016

Objective 3.5 Energy

Energy use is managed, and electricity generation and transmission is operated, maintained, developed and upgraded, in a way that:

- a. increases efficiency;*
- b. recognises any increasing demand for energy;*
- c. seeks opportunities to minimise demand for energy;*
- d. recognises and provides for the national significance of electricity transmission and renewable electricity generation activities;*
- e. recognises and provides for the national, regional and local benefits of electricity transmission and renewable electricity generation;*
- f. reduces reliance on fossil fuels over time;*
- g. addresses adverse effects on natural and physical resources;*
- h. recognises the technical and operational constraints of the electricity transmission network and electricity generation activities; and*
- i. recognises the contribution of existing and future electricity transmission and electricity generation activities to regional and national energy needs and security of supply.*

Objective 3.12 Built environment

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

- a. promoting positive indigenous biodiversity outcomes;*
- b. preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;*
- c. integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;*
- d. integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;*
- e. recognising and protecting the value and long-term benefits of regionally significant infrastructure;*
- f. protecting access to identified significant mineral resources;*
- g. minimising land use conflicts, including minimising potential for reverse sensitivity;*
- h. anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;*
- i. providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation;*
- j. promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and*
- k. providing for a range of commercial development to support the social and economic wellbeing of the region.*

Policy 6.3 Co-ordinating growth and infrastructure

Management of the built environment ensures:

- a. the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, in order to:

 - i. optimise the efficient and affordable provision of both the development and the infrastructure;*
 - ii. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;*
 - iii. protect investment in existing infrastructure; and*
 - iv. ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;**
- b. the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated;*
- c. the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and*
- d. a co-ordinated and integrated approach across regional and district boundaries and between agencies; and*
- e. that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.*

Policy 6.6 Significant infrastructure and energy resources

Management of the built environment ensures particular regard is given to:

- a. that the effectiveness and efficiency of existing and planned regionally significant infrastructure is protected;*
- b. the benefits that can be gained from the development and use of regionally significant infrastructure and energy resources, recognising and providing for the particular benefits of renewable electricity generation, electricity transmission, and municipal water supply; and*
- c. the locational and technical practicalities associated with renewable electricity generation and the technical and operational requirements of the electricity transmission network.*

Implementation Method 6.6.2 Transmission corridor management approach

Waikato Regional Council will work with territorial authorities and energy companies and in consultation with other relevant industry organisations, to develop a transmission corridor management approach which:

- a. recognises the benefits of the national electricity grid;*
- b. identifies key transmission corridors in district plans, and:

 - i. protects the corridor and electricity transmission network from inappropriate activities (including “sensitive activities”, as defined in the National Policy Statement on Electricity Transmission); and**

- ii. *manages the adverse effects (including reverse sensitivity effects) of subdivision, use and development on the operation, maintenance, upgrading and development of the electricity transmission network.*
- c. *identifies and addresses potential effects on people and communities and natural and physical resources from new transmission infrastructure;*
- d. *seeks opportunities for alignment with other infrastructure corridors;*
- e. *recognises that energy companies may be affected parties with respect to land use change, including subdivision and development; and*
- f. *seeks to manage the effects of third parties on the safe and efficient operation of the transmission network.*

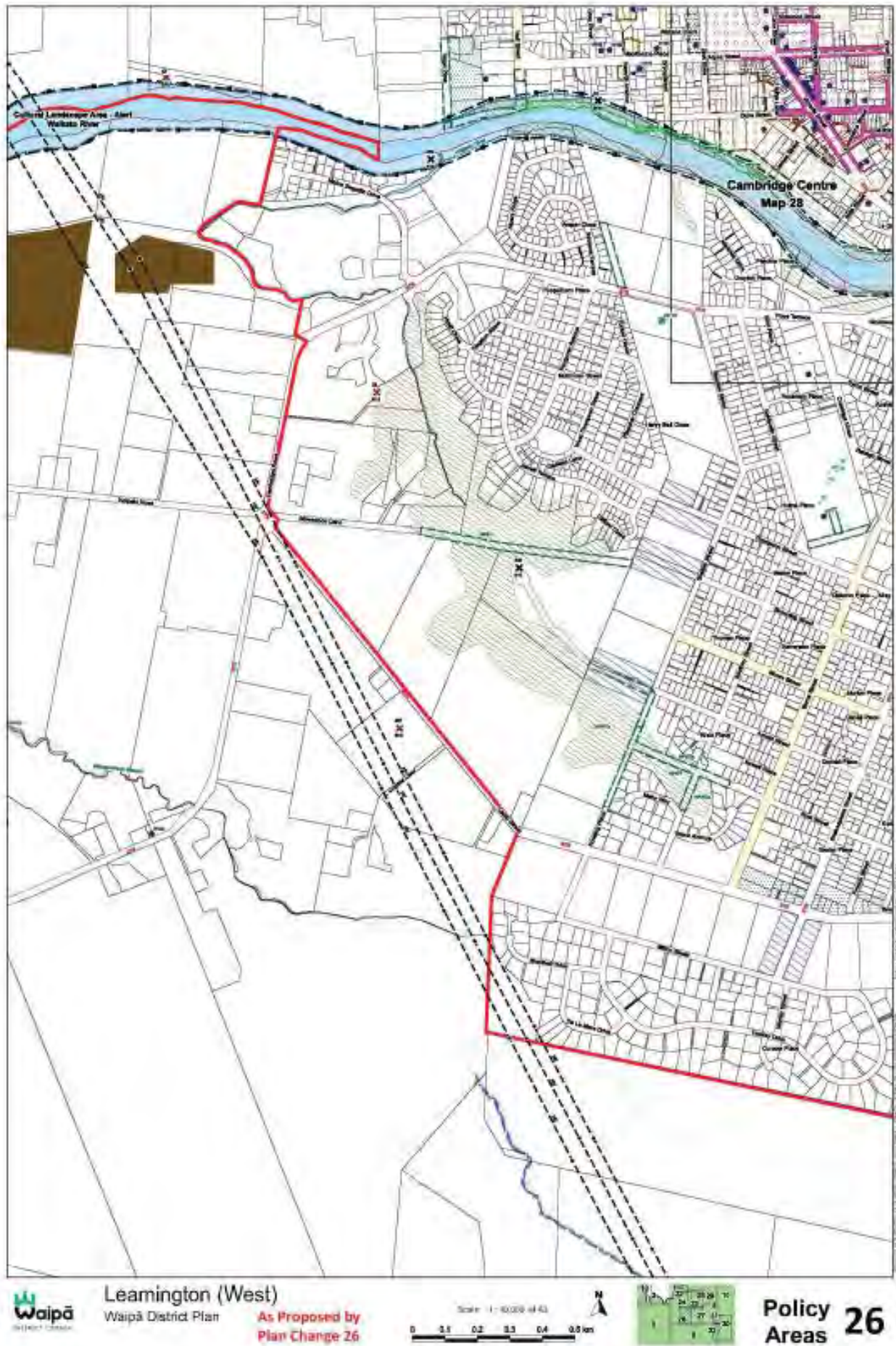
Implementation Method 6.6.5 Measures to avoid adverse effects

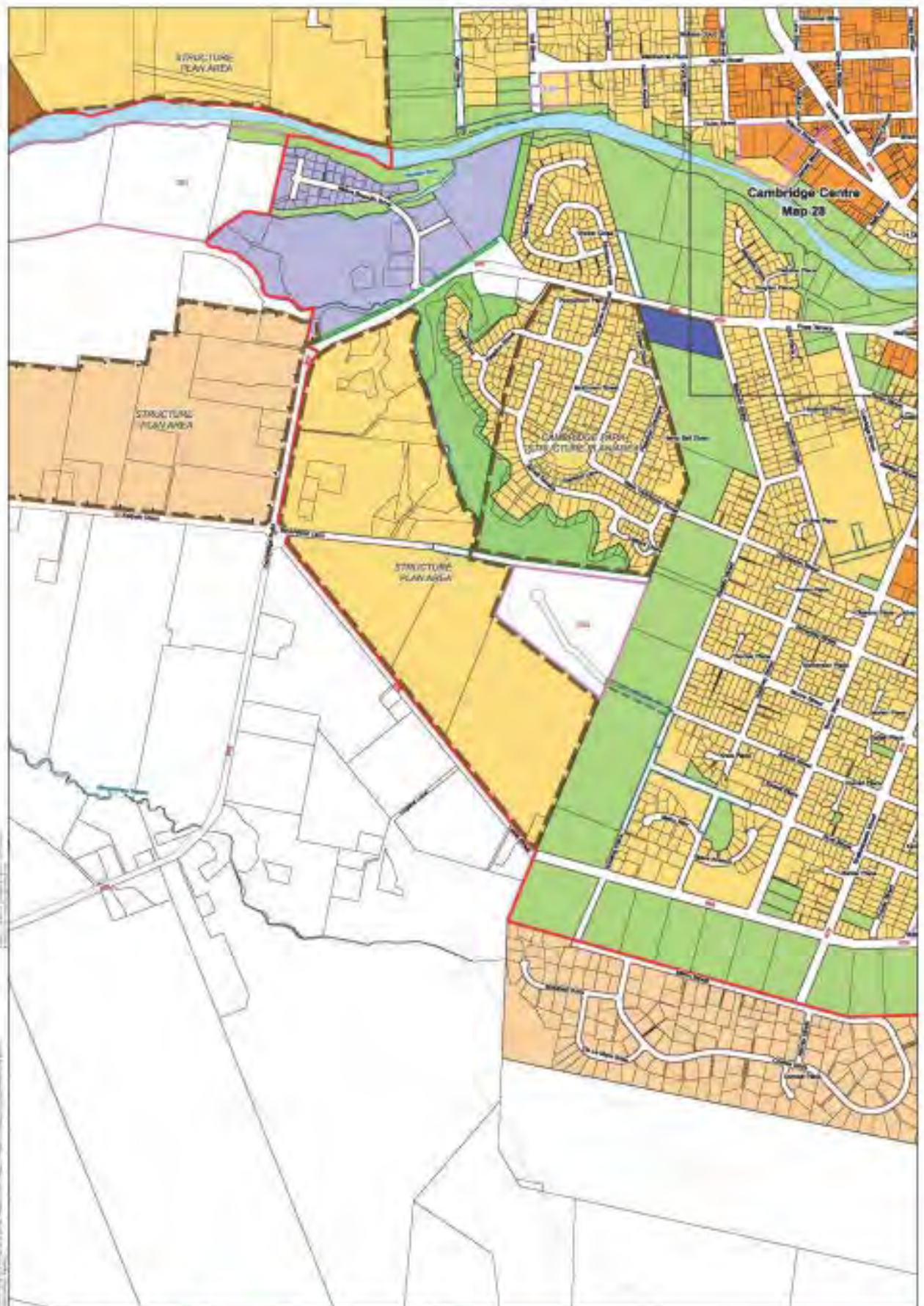
Local authorities should ensure that appropriate measures are implemented to avoid adverse effects of development of the built environment on the safe, efficient and effective operation of regionally significant infrastructure. With respect to electricity transmission corridors, development of the built environment should also take into account National Policy Statements, National Environmental Standards and Transmission Corridor Guidelines as relevant to the circumstances.

Appendix E: Plan Change 12 – Zoning Map as relating to the National Grid









26 Zones



Leamington (West)

Waipā District Plan

As Proposed by
Plan Change 26

