

Highlights Package

Summary of evidence of Pauline M Whitney on Submission points by Transpower NZ Ltd Before Waikato District Council

Proposed Waikato District Plan: Hearing 22 – Infrastructure

- 1 My name is Pauline Mary Whitney. I am a Senior Planner: Principal of Boffa Miskell Limited. I am a Full Member of the New Zealand Planning Institute and have over 23 years' experience as a resource management planner.
- 2 This summary briefly sets out an overview of my Primary and Rebuttal Evidence, responds to the Section 42A Rebuttal Evidence on the Proposed Waikato District Plan ("PWDP"), and outlines a summary of outstanding provisions.

The National Grid Policy Framework

- 3 As outlined in Primary Evidence, Transpower owns and operates the National Grid. The need to operate, maintain, develop and upgrade the electricity transmission network is recognised as a matter of national significance through the National Policy Statement on Electricity Transmission 2008 ('NPSET'). Section 75(3) of the Resource Management Act ("RMA") requires that a District Plan must 'give effect' to a NPS and is a strong statutory directive. The NPSET has three broad aspects – Enabling the National Grid; Managing the effects of the National Grid; and Managing the effects on the National Grid.

Transpower's submissions

- 4 In its submission Transpower generally supported the PWDP infrastructure and National Grid specific provisions, with the focus being on refinement as opposed to fundamental changes. Overall, I support the approach adopted in the PWDP and note it reflects the approach adopted in many other plans, particularly in relation to managing activities undertaken by other parties.

Outstanding submission points

- 5 In my Primary Evidence I identified nine outstanding submission points/plan provisions. I have reviewed the S42A Rebuttal Evidence and my response is summarised in the follow table (Attached A). For ease of reference I note outstanding provisions are shown as **green** text. Unless otherwise outlined below, the relief sought in my Primary and Rebuttal Evidence stands, in particular the provisions (including definition) relating to the National Grid Subdivision Corridor.

Pauline Whitney, 15 October 2020

Attachment A - Summary Table of Outstanding Provisions

PWDP Provision	Position in response to S42A Reports (Primary and Rebuttal_	Relief/Amended Text Sought (Changes recommended by the s42A Report are identified in red, those recommended in the S42A Rebuttal are identified in purple, and outstanding changes sought in this evidence identified in green):
Policy 6.2.5.	I support the amendments shown in red and purple but remain supportive of the text in green, the purpose being to clarify the application and relationship of the policy to other PWDP provisions.	<p>.....</p> <p>(v) Within urban environments, aAddressing the adverse effects on any heritage values, <u>cultural values, outstanding natural landscapes, areas of high natural character</u>, town centres, areas of high recreation value and existing sensitive activities including the avoidance of adverse effects where practicable.</p> <p>(vi) Within rural environments, seeking to avoid adverse effects on identified heritage values, cultural values, outstanding natural landscapes, <u>outstanding natural features, significant natural areas, significant amenity landscapes</u>, areas of <u>outstanding or</u> high natural character, areas of high recreation value and existing sensitive activities.</p> <p><u>In the event of any conflict with any other objectives and policies in the plan relating to the values, features and areas listed above, Policy 6.2.5 takes precedence.</u></p>
New National Grid substations /switching stations in Identified Areas.	While I appreciate new above ground transmission lines are recommended to be discretionary, I remain supportive of the provision of a discretionary activity status for new National Grid substations/switching stations within Identified Areas.	<p>14.4.3 Discretionary Activities</p> <p>(a) <i>The activities listed below are discretionary activities.</i></p> <p>....</p> <p><u>D4 Substations and switching stations associated with the National Grid located within Identified Areas</u></p>
Earthworks Rules 14.4.2. RD3 and 14.4.4. NC11.	<p>Although a minor point (and potentially a drafting issue) I support amendment to the restricted discretionary activity rule 14.4.2 RD3 to clarify its application and rule relationship.</p> <p>I support the deletion of recommended NC11 as the matter is addressed under recommended non-complying rule 14.4.4 NC1 – as recommended by the S42A Reports.</p>	<p>RD3 Earthworks or vertical holes within the National Grid Yard that does not comply with one or more of the conditions (a) of Rule 14.4.1.3(1) or and Rule 14.4.1.3(2) but complies with conditions (b) (c) (d) and (e) of Rule 14.4.1.3(12)</p> <p>14.4.4 Non-Complying Activities</p> <p>NC11 Earthworks within the National Grid Yard that is not a permitted activity under Rule 14.4.1 P3 or a restricted discretionary activity under Rule 14.4.2 RD3 or a discretionary activity under Rule 14.4.3</p> <p>NC1 Earthworks within the National Grid Yard that is not a permitted activity under Rule 14.4.1 P1 P3 or a restricted discretionary activity under Rule 14.4.2 RD3 or a discretionary activity under Rule 14.4.3 D</p>
Rules 14.4.1.2 P2 and 14.4.4.	My preference remains for the deletion of the officer recommended (clause (g)) prescriptive list of permitted farming related activities (on the basis that such activities are already permitted under other rules). However, should it be retained, the clause should only apply to "... within 12m of the	<p>14.4.1.2 P2</p> <p>.....</p> <p><u>(g) Minor structures associated with farming activity that are not situated within 12m of the outer visible foundation of any National Grid support structure tower or 10m of the outer visible foundation of a National Grid tower, including: fences, gates, stock exclusion structures, cattle stops, stock underpasses, stock bridges and culvert crossings, and drinking water supply pipelines, troughs, and water storage tanks.</u></p>

	outer visible foundation of any National Grid support structure...” and the reference to 10m be removed.	
	The amendment to 14.4.4 NC5 is supported and reflects that within the S42A report but was not carried through into the tracked changes version.	<u>NC5 Any new building for a sensitive land use, or any addition to an existing building that involves an increase in the building envelope or height for a sensitive land use within the National Grid Yard</u>
	The amendment to 14.4.4 NC9 is supported and reflects that recommended in the S42A report but not carried through into the tracked changes version. The only further change I support is reference to protective canopies as opposed to PSA structures, to reflect that sought by Hort NZ and which I support.	<u>NC9 Dairy/milking sheds (excluding accessory structures and buildings), commercial green houses, Pseudomonas syringae pv. Actinidiae (Psa) disease control structures protective canopies or buildings for intensive farming within the National Grid Yard</u>
	I remain supportive of a new non-complying rule 14.4.4 NC11 to act as a default catch all rule to provide a linkage to the other rules within Section 14.4.1 relating to the National Grid.	<u>NC11 Any building or structure within the National Grid Yard that is not a permitted activity under Rule 14.4.1, a Restricted discretionary activity under Rule 14.4.2 or a Discretionary activity under Rule 14.4.3.</u>
Advice Notes	I remain supportive of the provision of an advice note relating to notification in order to provide clarity that Transpower will be considered an affected party should the National Grid corridor rules not be complied with.	<u>An activity, including buildings and structures, earthworks, and quarrying within the National Grid Corridor or National Grid Yard may require resource consent. Transpower will be considered to be an affected party where consent is required under the National Grid specific rules. Where an activity requires resource consent solely because it is within the National Grid Yard and/or Corridor, public notification of the application is precluded. However, limited notification will be given to Transpower unless the written approval from Transpower is provided at the time the application is lodged. Notification to other parties is not precluded if resource consent is required for any other matters in the District Plan.</u>