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Keeping the energy flowing

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10 August 2023

For the Attention of the Greater Wellington Regional Council Proposed Change 1 to the Regional Policy Statement for the Wellington Region – Freshwater Hearings Panel and P1S1 Panel

Hearing Stream Three - Statement by Transpower New Zealand Ltd (submitter reference S10 and FS23)

Transpower New Zealand Limited (“**Transpower**”) writes in relation to Hearing Stream 3, commencing on 28 August 2023, on the Greater Wellington Regional Council Proposed Change 1 (“**PC1**”) to the Regional Policy Statement for the Wellington Region.

Transpower lodged eight submission points specific to Hearing Stream 3 (three original and five further) the main purpose of which was to appropriately recognise and give effect to the National Policy Statement on Electricity Transmission 2008, within context of the PC1.

Transpower has considered the Section 42A Report on its submission points and largely agrees with or supports the officer recommendations. However, upon review of the recommendations Transpower does wish to highlight that the provisions of the RPS need to ensure the National Policy Statement on Electricity Transmission 2008 (“**NPSET**”) is given effect to. This requires wider changes than those within scope of PC1¹. While the plan change addresses climate change (and the National Policy Statement for Renewable Electricity Generation 2011 (“**NPSREG**”) to a limited degree), arguably it does not give effect to the NPSET. The S42A Report does provide commentary² on proposed /draft amendments to the NPSET and NPSREG. Transpower agrees the proposed/draft amendments are relevant in context of PC1. However, submits that a comprehensive review and change is required for the RPS to give effect to the current gazetted NPSET and NPSREG instruments, and any future updates.

With reference to the gazetted NPSET and NPSREG, Transpower would support the use of more directive language within Policy 7 and 39. For completeness, Attachment A contains a table outlining the individual submission points and Transpower’s response to the Section 42A Report recommendations.

Transpower respectfully requests that this letter be tabled for the Panel’s consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

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

¹ As noted in the S32 Report, “Change 1 is to implement the National Policy Statement on Urban Development (NPS-UD) and National Policy Statement for Freshwater Management (NPS-FM) in the RPS. These NPS will also be implemented through regional plan and district plan changes”.

² Proposed Change 1 to the Regional Policy Statement for the Wellington Region Hearing Stream: 3 Officer’s Report: Climate Change – Energy, Waste and Industry. Paragraph 36

Yours faithfully

A handwritten signature in blue ink, appearing to read 'RENG', with a small dot at the end.

Rebecca Eng
Technical Lead – Policy, Transpower New Zealand Limited

Attachment A. Transpower New Zealand Limited – Response to Greater Wellington Regional Council RPS Proposed Change 1 Hearing Stream 3: Climate Change

| Sub No / Point No | Plan Part / Sub-part / Chapter / Provision | Position | Summary of Submission | Decisions Requested | S42A response | Transpower's response to S42A recommendation |
|--|---|-----------------|--|---|-----------------------|---|
| Climate Change – Climate Resilience and Nature Based Solutions | | | | | | |
| S30.062 Porirua City Council | Policy CC.14: Climate resilient urban areas – Consideration | Oppose | Council opposes Policy CC.14 and seeks its deletion. | Delete policy or amend so that it provides clear and appropriate direction to plan users in line with objectives. | Accept in part | Transpower accepts the recommendation on the basis the recommended qualifier “including by, as appropriate to the activity:” is retained. Such a qualifier recognises that some measures, such as those relating to canopy trees are not appropriate in context of the National Grid. |
| FS23.008 Transpower NZ Ltd (note the summary of submission has incorrectly coded this FS against S168.0126) | Policy CC.14: | Support | Transpower agrees with the reasoning provided by the submitter as to the practical concerns and issues with the policy as proposed. Specific to the National Grid, it is inappropriate to create green spaces underneath the National Grid lines on the basis vegetation can pose health and safety issues as well as pose an operational risk to the National Grid. The policy as proposed does not clearly articulate the outcomes sought and how they are to be achieved and as drafted, clause (a) and (d) would apply to a resource consent application associated with the National Grid. | Allow | Accept | |
| Natural Hazards | | | | | | |
| S10.003 Transpower NZ Ltd | Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans | Support in part | Policy 29 would benefit from clarification of what is meant by a 'low', 'moderate', 'high' or 'extreme' hazard or risk. The use of "low to moderate" in (c) and "high to extreme" in (d) makes it unclear whether it means low or moderate or a separate category of 'low to moderate'. Policy 29 drafting indicates (d) only applies where both hazards and risks are high to extreme, so an activity could locate in a high hazard area if the risk was moderate. However, this also needs clarification. Clarify the wording of Policy 29 in relation to hazards and risks and different hazard and risk levels or categories. | Define the terms used in Policy 29 or provide the reader with guidance. For example, in the Explanation, on where definition of these terms can be found. | Accept | Transpower supports the officer recommendation. In particular Transpower supports the clarification over language and reference to “functional or operational need” within clause d. |

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| FS12.020 Kāinga Ora - Homes and Communities | | Support | Kāinga Ora agrees that low, medium, and high categorization of risk is consistent with best practice. Kāinga Ora considers that definitions should be provided for consistent use throughout the region. | Allow | Accept in part | |
| S113.027 Wellington Water | Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans | Support in part | Not all activities can avoid high risk areas. For example, anywhere wet is considered high risk under the pNRP but many Wellington Water activities need to occur in wet locations. | Amend clause (d) as follows: <i>(d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks re assessed as high to extreme or to appropriately manage the risk for regionally significant infrastructure.</i> | Reject | Although rejected, the recommendation to recognise those activities with a “functional or operational need” within clause d, is supported and addresses Transpower’s concerns. |
| FS23.006 Transpower NZ Ltd | | Support | Notwithstanding the clarification sought in its original submission, Transpower supports the recognition within the policy for regionally significant infrastructure. | Allow | Reject | |
| Climate Change - Energy Waste and Industry | | | | | | |
| S10.001 Transpower NZ Ltd | Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans | Support in part | Transpower supports Policy 7 recognising the importance of transmission infrastructure that distributes renewable or zero/low carbon energy. The proposed changes to Policy 7 introduce the term "low and zero carbon". The term "low or zero carbon" has not been defined and it is unclear what it is intended to mean, particularly in the context of "low and zero carbon regionally significant infrastructure" in Policy 7. As the policy covers several rather distinct elements, it would be clearer if different elements could be more clearly articulated and distinguished within the existing Policy 7. Transpower notes that the policy refers to people having access to energy | Clarify the term "low and zero carbon", particularly in relation to regionally significant infrastructure, and how it is applied. Amend Policy 7 to recognise and provide for electricity transmission. Transpower requests the insertion of a new (a)(iv):(iv) <u>the provision of an efficient and effective electricity transmission system; and</u> ... | Accept | Transpower supports the recommendation for amendments to Policy 7. In particular Transpower supports the inclusion of clause (iv) as sought in the Transpower submission. Policy 1 of the NPSET would be given effect to through “the provision of an efficient, effective and |

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| | | | and requests specific recognition be included in the policy of the transmission system required to enable that access to energy. Such policy recognition would give effect to Policy 1 of the NPSET. | | | <i>resilient electricity transmission network</i> ". |
| S30.034 Porirua City Council | Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans | Oppose | Low and zero carbon regionally significant infrastructure needs to be defined to improve clarity and regulatory certainty. | 'Low and zero carbon' 'regionally significant infrastructure' needs to be defined to improve clarity and regulatory certainty. | Accept in part | Transpower supports the recommendation to delete references to 'low and zero carbon'. |
| FS23.002 Transpower NZ Ltd | Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans | Support | The term "low or zero carbon" has not been defined within the RPS or the plan change and therefore it is unclear what it is intended to mean, particularly in the context of "low and zero carbon regionally significant infrastructure" within Policy 7. It is unclear whether the policy is referring to regionally significant infrastructure itself being low or zero carbon or whether it is a reference to a particular kind of regionally significant infrastructure that supports low/zero carbon emissions. Accept in part (for example a renewable energy supply a transmission network to distribute renewable energy, a multi-modal transport network) or both. The explanation does not aid the interpretation and it is not clear what is meant by "in particular if regionally significant infrastructure is a low or zero carbon development" | Allow | Accept | |
| S99.001 Genesis Energy Limited | Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - | Support in part | The purpose of RPS Change 1 is to reduce GHG emissions rapidly. It is already recognized that support is required to hasten the transition of the energy economy to renewable sources. Genesis considers the current passive policy wording of 'recognising' the benefits from renewable energy does not meet the purpose of RPS Change 1 and will not induce change from the status. More direct and active wording is required, | Amend Policy 7 as shown below. <i>Policy 7: Recognising-Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure – regional and district plans. District and regional plans shall include policies and/or methods that recognise: (a) Promotes and enables the social, economic, cultural</i> | Accept in part | Transpower accepts the officer recommendation. Policy 1 of the NPSET would be given effect to through the provision of an efficient, effective and |

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| | regional and district plans | | <p>and can be achieved by the use of the words to 'promote and enable' as set out in the decision sought column. In addition to promoting and enabling renewable energy development, Genesis considers the policy direction should also seek to protect the benefits derived from this infrastructure from reverse sensitive effects.</p> <p>Renewable energy development is dependent on the ability to locate where the resource is and the benefits from renewable energy is wide reaching and extends beyond the region boundaries. The protection of these benefits must be provided and is separate to the existing Policy 8 which seeks to protect regionally significant infrastructure.</p> | <p><i>and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including.... (iii) people have access to <u>secure and affordable energy, maximising and preferably low or zero carbon energy sources, so as to meet their needs;</u>.... (b) <u>Promotes and enables the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including: (i) security of supply and diversification of our energy sources; (ii) reducing dependency on imported energy resources; and (iii) reducing greenhouse gas emissions.</u> (c) <u>Protects the social, economic, cultural and environmental benefits of renewable energy and regionally significant infrastructure from reverse sensitivity effects.</u></i></p> | | <p>resilient electricity transmission network.</p> <p>Notwithstanding the above, Transpower does consider merit in providing more directive wording within Clause a). The inclusion of reference to "<u>recognise and provide for</u>" as is recommended for Clause b), would give effect to Policy 1 of the NPSET and Policy A of the NPSREG.</p> |
| FS23.004 Transpower NZ Ltd | | Support | The use of more directive wording within the policy is supported. | Allow | Accept in part | |
| S10.004 Transpower NZ Ltd | Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration | Support in part | As for Policy 7, Policy 39 covers several rather distinct elements. While Transpower does not oppose the addition of the text in (a) referencing reducing greenhouse gas emissions, Transpower submits clause d) of the policy could benefit from greater recognition of the need for transmission of the energy and electricity generation. Such reference would give effect to the NPSET. | <p>Amend Policy 39(d) to recognise high voltage electricity transmission.</p> <p>....</p> <p><i>(d) <u>significant wind, solar and marine renewable energy resources within the region and the operation, maintenance, upgrade and development of the electricity transmission network to support the transmission of the renewable energy resource.</u></i></p> | Accept in part | While Transpower supports the recommended change to 'recognise' regionally significant infrastructure and the cross reference to Policy 7, Transpower considers there still merit to explicitly reference the electricity |

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| FS26.050 Meridian Energy Limited | | Support | Meridian agrees that, given the essential role of the electricity transmission network in supporting community resilience and economic endeavour, the RPS should explicitly recognise the importance of its operation, maintenance, upgrading and development to meet future needs. | Allow to the extent that any amendments are consistent with Meridian's own requested relief. | Accept in part | transmission network as sought in the Transpower submission. |
| S100.018 Meridian Energy Limited | Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration | Support in part | Many of the proposed amendments set out in proposed RPS Change #1 seek to hasten the transition from an economy that is dependent on fossil fuels and generates greenhouse gas emissions. Proposed RPS Change #1 focuses on reducing fossil fuel dependence and reducing greenhouse gas emissions but is silent on how the fossil fuel is to be replaced in the transition towards a low emissions economy reliant on renewable energy. The result is a suite of policies that only address part of the issue. | <p>This shortcoming could be overcome (in part) by including policy support for the use and development of renewable energy which generating Policy 39 is an opportunity to complement the other proposed amendments to the RPS and genuinely facilitate the transition to a low emissions economy reliant on renewable energy. from fossil fuel dependence towards a low emission economy based on renewable energy as follows (or similar to achieve a similar outcome):</p> <p><i>"Policy 39: <u>Recognising Promoting and enabling the benefits from renewable energy and regionally significant infrastructure – consideration</u></i></p> <p><i>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</i></p> <p><i>(a) <u>promoting and enabling the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it these contributes to reducing dependence</u></i></p> | Accept in part | While Transpower supports the recommended change to 'recognise' RSI and the cross reference to Policy 7 (which outlines specific benefits including the "provision of an efficient, effective and resilient electricity transmission network"), Transpower considers there is merit in providing explicit and directive wording within the consideration policy. The inclusion of reference to " <u>recognise and provide for</u> " within clause b) (as is recommended for Clause a)) would give effect to Policy 1 of the NPSET and Policy A of the NPSREG. |

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| | | | | <p><i>on fossil fuels and potential greenhouse gas emissions; and</i></p> <p><i>(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</i></p> <p><i>(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</i></p> <p><i>(d) significant wind, solar and marine renewable energy resources within the region.</i></p> <p><i>Explanation</i></p> <p><i>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions.</i></p> <p><i><u>The benefits of energy generated from renewable energy resources include:</u></i></p> <ul style="list-style-type: none"> <i>• <u>Security of and the diversification of New Zealand's energy sources</u></i> <i>• <u>Reducing dependency on fossil fuels and imported energy resources – such as oil, natural gas and coal</u></i> <i>• <u>Contributing to the transition to a low emissions economy</u></i> | | |

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| | | | | <ul style="list-style-type: none"> • <u>Reducing greenhouse gas emissions</u> <i>The benefits are not only generated by large scale renewable energy projects but also smaller scale, distributed generation projects. The benefits of regionally significant infrastructure include:</i> • <u>People and goods can efficiently and safely move around the region, and to and from</u> • <u>Public health and safety is maintained through the provision of essential services – such as potable water and the collection and transfer of sewage or stormwater</u> • <u>People have access to energy to meet their needs</u> • <u>People have access to telecommunication services</u> <p><i>Energy generation from renewable energy and regionally significant infrastructure (as defined in Appendix 3) can provide benefits both within and outside the region.</i></p> | | |
| <p>FS23.00 Transpower NZ Ltd</p> | | Support | The use of more directive wording within the policy is supported. | Allow | Accept in part | |