

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER OF of the Resource Management Act 1991

AND

IN THE MATTER OF the Proposed Queenstown Lakes District Plan

STATEMENT OF EVIDENCE BY MEGAN JUSTICE

ON BEHALF OF POWERNET LIMITED

(Submitter 251 and Further Submitter 1259)

(1 September 2016)

1. INTRODUCTION

- 1.1 My name is Megan Justice. I hold a Masters degree in Regional and Resource Planning from Otago University, obtained in 1999 and I am a full member of the New Zealand Planning Institute. I am a senior Environmental Consultant with the firm Mitchell Partnerships Limited, which practices as a planning and environmental consultancy throughout New Zealand, with offices in Auckland, Tauranga and Dunedin. I have been employed as an Environmental Consultant for fourteen years and have been employed by the Department of Conservation as a Permissions Advisor for one year.
- 1.2 My experience includes consultancy resource management work and in recent years, I have focused on providing consultancy advice with respect to resource consents, policy advice on regional and district plans, plan changes, designations and environmental effects assessments. This includes extensive experience with large-scale projects involving inputs from multidisciplinary teams.
- 1.3 Recent projects in which I have been involved with are set out in **Appendix A** to this evidence.
- 1.4 I have been engaged by PowerNet Limited ("**PowerNet**") to provide advice in relation to the Proposed Queenstown Lakes District Plan ("**Proposed Plan**"). My firm assisted in the preparation of PowerNet's submission on the Proposed Plan. In preparing this evidence I have reviewed the summary of submissions on the Proposed Plan, the further submissions made on PowerNet's submission and the section 42A reports provided by the Council in relation to this matter.
- 1.5 Whilst I accept that this is not an Environment Court hearing, I have read and agree to comply with the Environment Court's Code of Conduct for Expert Witnesses contained in the Practice Note 2014. I confirm that the issues addressed in this brief of evidence are within my area of

expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express here.

2. SCOPE OF EVIDENCE AND BACKGROUND

- 2.1 This brief of evidence relates to the submissions and further submissions made on the provisions contained in the Proposed Plan that impact upon PowerNet's functions of providing electricity to the Queenstown Lakes District community. PowerNet's submission provided a summary of its activities in the District.
- 2.2 In brief, PowerNet is an electricity network management company, first established to develop, manage and maintain its electricity network assets such as lines, poles, cables, substations and other equipment, in a cost-effective way. PowerNet is the equivalent of the fifth largest network company in New Zealand, delivering electricity to around 67,000 consumers, which includes Queenstown Lakes District customers.
- 2.3 PowerNet is a network utility operator. Network utility operators are defined in the Resource Management Act 1991 ("**the RMA**") and specifically include electricity operators or electricity distributors for the purpose of line function services.
- 2.4 In the Queenstown Lakes District, PowerNet operates an underground cable network at 33kV, 22kV and 400V, a Zone Substation and local switchgear and distribution transformers at Frankton.
- 2.5 Around Kingston, PowerNet operates overhead 11kV and 400V lines and cables, switchgear and distribution transformers.
- 2.6 Given the population growth and increasing demand for electricity in the District, future upgrading and expansion of these networks is likely.
- 2.7 Network utility operators are often constrained in the selection of sites on which they locate, particularly when they are part of a regional

network. It is important to recognise these locational constraints as well as the positive effects of utilities in considering the overall impact of the environmental effects of network utilities.

- 2.8 At a strategic level, infrastructure providers warrant appropriate recognition in District Plans due to the significant role they play in contributing to the social and economic wellbeing of the community. This includes an appropriately enabling rule framework as well as policy recognition that enables the development, operation and maintenance of utility networks in an effective and efficient manner.

3. STATUTORY MATTERS

- 3.1 The Operative Regional Policy Statement for Otago contains provisions that are relevant to the type of utility activities provided by PowerNet in Chapter 9: Built Environment. In particular, Objective 9.4.2 states:

To promote the sustainable management of Otago's infrastructure to meet the present and reasonably foreseeable needs of Otago's communities.

- 3.2 Policy 9.5.2 is associated with this objective, and seeks to promote and encourage efficiency in the development and use of Otago's infrastructure, through maximising Otago's existing infrastructure and recognizing the need for more appropriate technology; promoting co-ordination amongst network utility operators; and avoiding, remedying or mitigating the adverse effects of subdivision use and development on regional infrastructure.
- 3.3 The Proposed Regional Policy Statement for Otago has been notified, submissions have been received and the hearings have been completed. Decisions on the submissions made on the Proposed Regional Policy Statement have not yet been released.

3.4 The Proposed Regional Policy Statement for Otago contains several provisions that relate to the type of infrastructure that is provided by PowerNet, including:

Objective 3.4: Good quality infrastructure and services meet community needs.

Objective 3.5: Infrastructure of national and regional significance is managed in a sustainable way.

Objective 3.6 Energy supplies to Otago's communities are secure and sustainable

3.5 The policies associated with these objectives seek to provide for infrastructure to account for land use change and population change¹ while ensuring infrastructure maintains or enhances health and safety of the community. The policies also seek that adverse effects of infrastructure activities on natural and physical resources are reduced and that infrastructure activities support economic, social and community activities².

3.6 The Proposed Regional Policy Statement also identifies and provides for "lifeline utilities", which are defined as "has the meaning set out in section 4 of the Civil Defence Emergency Management Act 2002"³. PowerNet's electricity supply network is included in those lifeline activities. Policy 3.4.3 provides for the design of lifeline utilities to maintain their ability to function in a natural hazard event. Policy 3.4.4 seeks to protect the functionality of lifeline utilities by managing reverse sensitivity effects, and managing all other effects that may impact upon on the lifeline utility.

¹ Policy 3.4.1

² Policy 3.4.2

³ Section 4 of the Civil Defence Emergency Management Act 2002: lifeline utility means an entity named or described in [Part A](#) of Schedule 1, or that carries on a business described in [Part B](#) of Schedule 1. Part B 2 states: an entity that generates electricity for distribution through a network or distributes electricity through a network.

3.7 I have set out the relevant objectives and policies of the Operative Regional Policy Statement for Otago and the Proposed Regional Policy Statement for Otago in **Appendix B** of my evidence.

4. ANALYSIS OF POWERNET'S SUBMISSIONS ON CHAPTER 30 – ENERGY AND UTILITIES

4.1 PowerNet's submissions and further submissions on the Energy and Utilities chapter of the Proposed Plan sought changes to:

- The introduction text.
- Objective 30.2.5.
- The addition of a new policy to provide for the development and use of utilities.
- Amendments to the Chapter 30 policies and the rules that provide for utilities.

4.2 Where these submissions have not found favour with the Council's s42A report author, I provide my view on the submissions and relief sought by PowerNet below.

Introduction Text

4.3 PowerNet's submission sought changes to the introductory text of section 30.1.2 – Utilities to, primarily, amend the discussion about how utilities generate adverse effects. The amendments sought are:

While it is recognised ~~while that~~ utilities ~~can~~ have national, regional and local benefits, they can also have adverse effects on the environment surrounding land uses, some of which have been established long before the network utility. The sustainable management of natural and physical resources requires a balance between the effects of different land uses. However, it is also necessary that essential utilities are protected, where possible, from further encroachment by incompatible activities which may be subject to reverse sensitivity effects.

This chapter therefore also addresses requirements for sensitive uses and habitable buildings located near to utilities.

- 4.4 The relief sought would change the emphasis of this paragraph to focus on effects on the environment, rather than effects on existing land uses. This is important in my view, as the current text does not recognise the importance of utilities, but rather suggests that existing network utilities generate ongoing adverse effects on existing land uses, and that this is unacceptable. This should not be the case where permission for a network utility has been lawfully established under the RMA, and the adverse effects of the activity have been considered. In my view the notified text in this introductory paragraph is emotive, and does not acknowledge the fact that utilities are an essential service to provide for community economic and social wellbeing.

Objective 30.2.5

- 4.5 PowerNet's submission on Objective 30.2.5⁴ has been accepted in part by the s42A report author. In my view the amendments made to this objective improve this objective by seeking that utilities operate effectively and efficiently in the District, rather than just requiring the "co-ordination" of utilities activities and should be accepted.

Policy 30.2.6.4 and Policy 30.2.6.6 Addressing Reverse Sensitivity Effects

- 4.6 In its further submission, PowerNet opposed the submission of Federated Farmers of New Zealand which sought that Policy 30.2.6.4 should only apply to electricity transmission activities that are part of the National Grid. As notified, the policy applied to all transmission activities and sought to protect these lines against reverse sensitivity effects. While the s42A report recommends that Federated Farmers of New

⁴ Objective 30.2.5
Co-ordinate the provision of utilities as necessary to support the growth and development of the District.

Zealand submission be rejected, the s42A report author has recommended a new definition for sub-transmission activities and a new Policy 30.2.6.6. Recommended Policy 30.2.6.6 addresses reverse sensitivity effects on sub-transmission networks, which would include PowerNet's 33kV and 22Kv lines. I consider this recommended policy to be appropriate to provide for the effective and efficient functioning of these networks.

Policy 30.2.7.1

4.7 The s42A report has recommended a number of changes to Policy 30.2.7.1. In my view Councils strikethrough version should be amended as follows [my changes shown in underline and **yellow highlight**]:

Reduce Manage adverse effects associated with utilities by:

- Avoiding, remedying or mitigating their location on ~~sensitive sites, including heritage and identified sensitive environments, special character areas,~~ **heritage sites,** and protecting Outstanding Natural Landscapes and Outstanding Natural Features, ~~and skylines and ridgelines~~ from inappropriate development.
- Managing adverse effects on the amenity values of urban area and the Rural Landscapes.
- Encouraging co-location or multiple use of network utilities where this is efficient and practicable in order to avoid, remedy or mitigate adverse effects on the environment
- Ensuring that redundant utilities are removed
- Using landscaping and or colours and finishes to **reduce remedy or mitigate** visual effects **where necessary.**
- ~~Integrating utilities with the surrounding environment; whether that is a rural environment or existing built form.~~

My reasons for suggesting these changes are as follows:

4.7.1 First bullet point - The reference to heritage sites with 'identified sensitive environments' is uncertain, as it is unclear what these identified sensitive environments are. I accept the inclusion of Outstanding Natural Landscape and Features being specifically identified in this policy. However, I consider that other sensitive sites, such as protected heritage features, should also be specifically identified in this policy using the same terminology used in the planning maps. In my view inclusion of the words 'skylines and ridgelines' in this (first) bullet point is also unnecessary and potentially confuses the provision. In my view skylines and ridgelines which are within Outstanding Natural Landscapes and Features will be addressed via this bullet point. Effects on other Rural Landscapes, including the ridgelines and skylines in these areas will be managed via the new bullet point two of this policy.

4.7.2 Fifth bullet point - My concern with this bullet is that its starting point is that utilities will create visual effects. This may not be the case. My suggested amendments reflect this.

4.7.3 Last bullet point - I have two concerns with this bullet point. Firstly, in my experience, utility structures by their nature are visually distinct from more typical built forms, such as a dwelling. In this respect it will be very difficult to integrate a utility with the surrounding environment. Secondly, I also consider that the outcomes sought by this (last) bullet point of Policy 30.2.7.1 are addressed via the (new) second bullet point contained in the s42A version of the policy.

4.8 In my view the opening statement to Policy 30.2.7.1 should also be amended as follows as per the PowerNet submission:

~~Reduce~~ Manage adverse effects associated with utilities by: ...

- 4.9 The word 'manage' provides for the avoidance, remedying or mitigation, amongst other methods, to manage adverse effects. This more flexible approach better aligns with the sustainable management purpose of the RMA, which requires resource users to avoid, remedy or mitigate adverse effects on the environment⁵.

Rule 30.4.9 – Minor Upgrading

- 4.10 PowerNet supported Rule 30.4.9 which provides for the minor upgrading of utilities as a permitted activity. However, PowerNet sought an amendment to the definition of “minor upgrading” to include the replacement of equipment, including structures, transformers and equipment in switch rooms. The s42A report recommends a significant amendment of the “minor upgrading” definition, based largely on the submission by Aurora Energy Limited.
- 4.11 In my view this alternative definition is appropriate, subject to the following amendments [my changes shown with underlining and **yellow highlight**]:

means an increase in the carrying capacity, efficiency or security of electricity transmission and distribution or telecommunication lines utilising the existing support structures or structures of a similar scale, intensity and character, maintenance, replacement and upgrading of existing conductors or lines and support structures provided they are of a similar character, intensity and scale to the existing conductors or line and support structures and shall include the following:

- a) Addition of lines, circuits and conductors;*
- b) Reconducting of the line with higher capacity conductors;*
- c) Re-sagging of conductors;*
- d) Bonding of conductors;*
- e) Addition or replacement of longer or more efficient insulators;*
- f) Addition of electrical fittings or ancillary telecommunications equipment;*

⁵ Section 5(c) of the Resource Management Act 1991.

- g) Addition of earth-wires which may contain lightning rods, and earth-peaks;
- h) Support structure replacement within the same location as the support structure that is to be replaced;
- i) Addition or replacement of existing cross-arms with cross-arms of an alternative design; and
- Replacement of existing support structure poles provided they are less or similar in height, diameter and are located within 1 metre of the base of the support pole being replaced;
- Addition of a single ~~service~~ support structure for the purpose of providing a service connection to a site, except in the Rural zone;
- ~~The addition of up to three new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone;~~
- Replacement of conductors or lines provided they do not exceed 30mm in diameter or the bundling together of any wire, cable or similar conductor provided that the bundle does not exceed 30mm in diameter;
- Replacement of equipment ancillary to the line network provided that the replacement equipment is of the same or similar size as the equipment being replaced.
- ~~Re-sagging of existing lines;~~
- ~~Replacement of insulators provided they are less or similar in length;~~
~~and~~
- ~~Addition of lightning rods, earth-peaks and earth-wires.~~

4.12 The s42A report does not provide any discussion on why the third bullet has been deleted from this definition, and consequently from the permitted activity rule.

4.13 Under the Operative District Plan support structures being replaced are able to be located within 1m of the existing support structure. This was a practical approach, enabling the new pole to be erected prior to the existing pole being removed. In my view this allowance for the relocation of the support structure up to a metre from the existing support structure should be retained in the definition of 'minor upgrading'.

- 4.14 I consider that extending the definition to also include the like for like replacement of equipment, such as switch boards and transformer's, would also be appropriate under the permitted minor upgrading rule. This will provide greater certainty and increased efficiency for utility providers when routine upgrading of infrastructure is required, with no change in environmental outcomes.
- 4.15 Regarding the removal of the clause that enabled line extensions by three new support structures (except in Rural zones) from the definition, it is unclear why this activity has been deleted from the minor upgrading definition. Enabling this activity to occur as part of a minor upgrade is pragmatic, and will avoid the requirement to obtain a controlled activity resource consent for this activity.

Rule 30.4.15 – Buildings Associated with a Utility

- 4.16 PowerNet sought that Rule 30.4.15 “Buildings (associated with a Utility)” be amended to explicitly include “structures”. As drafted, this rule provides for buildings associated with a utility up to 10m² and 3m in height as permitted activities. The s42A report has recommended include a new Rule 30.4.16 which provides for buildings and structures up to 10m² and 3m in height as a permitted activity. I consider this rule to be appropriate as it will address PowerNet’s concerns with Rule 30.4.15.

New Rule 30.4.22 – Underground Lines

- 4.17 The s42A report has recommended a new permitted activity rule for underground lines (Rule 30.4.22). This new rule addresses PowerNet’s submission that opposed the discretionary activity studs of underground lines. I consider this recommended rule to be appropriate.

Rule 30.4.1.6 – Overhead Lines and Support Structures

- 4.18 PowerNet's submission sought the deletion of Rule 30.4.1.6 (now 7) which provides a separate rule for lattice towers, overhead lines and support structures, masts and antenna greater than 1.2m in diameter in the Remarkables Park Zone⁶ as a non-complying activity. PowerNet owns a zone substation which is located within the Remarkables Park Zone, and questioned why this outlier rule has been retained in the Proposed Plan. With the deletion of this rule, utility activities in this zone would rely on the other rules of the Energy and Utilities Chapter, as is the case for all other zones in the Districts.
- 4.19 No discussion has been provided regarding this rule in the s42A report, other than a comment that PowerNet's submission does not address the design requirements for the zone⁷. I note that recommended Rule 30.4.20 classifies any antenna in an area identified as an Outstanding Natural Landscape or Feature as a discretionary activity. In fact, there are no other utility activities that comprise non-complying activities in Table 30.4. In my view, the Outstanding Natural Landscapes and Features comprise a more sensitive environment than the Remarkables Park Zone and in my view the more onerous activity status is attributed to utility structures and buildings within that zone is inappropriate.

Activity Status of Activities Not Meeting Setback Performance Standards in Table 30.5

- 4.20 PowerNet's submission sought that the activity status for activities which do not achieve the setback requirements be changed from discretionary to restricted discretionary. This submission is not supported by the s42A report author. In my view a restricted discretionary activity status is appropriate for such infringements. A full discretionary activity status is overly onerous when the only effects of the activity will be those effects directly related to the yard infringement. I have set out below a suitable

⁶ I note that the Remarkables Park Zone is to be included in Stage 2 of the District Plan Review process.

⁷ S42A report, page 98.

matter of discretion for a restricted discretionary activity of this nature, should the Panel concur with my view on this matter:

The extent to which the infringement adversely affects the amenity values of the streetscape for road setback infringements, or neighbouring properties for side and rear yard infringements, relative to a complying proposal.

Exemption for Support Structures from Height Limits

- 4.21 Rule 30.5.8 requires that all buildings and structures comply with the relevant maximum height provisions for buildings of the zone they are in. PowerNet opposed this rule and sought an exemption for 'support structures for lines' be included in this rule. The Electricity Industry Standards and Regulations require safety clearances to be achieved for electricity line support structures. Further, no utility provider would erect a line and support structure at a height that is higher than is technically necessary, as this would add unnecessary construction and maintenance costs. For this reason, I consider that "support structures for overhead lines" should be included in the exemptions to the height limit rule that applies to all utility buildings and structures.

5. CONCLUSION

- 5.1 Through its submission, PowerNet has sought a number of amendments to the objectives, policies and rules of Chapter 30 so that it provides an appropriate framework for the provision of local electricity networks. The amendments to these provisions which I have set out in my evidence will assist PowerNet to deliver a reliable power network to serve the Queenstown Lakes District community.

M Justice

1 September 2016

APPENDIX A

Summary of Recent Project Experience

- Ryman Healthcare Limited – Submission and evidence preparation for the Proposed Replacement Christchurch City District Plan
- Ryman Healthcare Limited – Submissions and evidence preparation for the Proposed Auckland Unitary Plan
- Ryman Healthcare Limited – Halswell Retirement Village, Christchurch
- Ryman Healthcare Limited – New Retirement Village Christchurch
- Ryman Healthcare Limited – New Retirement Village, Auckland City
- Ryman Healthcare Limited – New Retirement Village, Rangiora
- Chorus – South Island Planning Manager, Fibre to the Node Rollout, ultrafast Broadband Rollout and Rural Broadband Initiative Rollout
- Ryman Healthcare Limited – New Retirement Village on Highgate, Dunedin
- Port Marlborough New Zealand Limited – Plan Change 21 Marina and Mooring Management Areas, Waikawa Bay
- Imagine Property Group Limited – Apartment Developments in Sumner, Christchurch
- Otago Regional Council – New Principal Premises, Birch St Dunedin
- Avalon Estate Limited – Winery Development, Queensberry
- Ravensdown Fertiliser Limited – Coastal and Air Discharge Consent Renewal
- Imagine Property Group Limited – Apartment Developments in Frankton
- New Zealand Transport Agency – Contract Consultant
- Orchard Road Holdings – Apartment Development in Wanaka
- Infinity Investment Group – Pegasus Town, Canterbury
- Infinity Investment Group – Riverside Stage 6 Variation
- Department of Corrections – New Corrections Facility, Milton, Otago
- Department of Child Youth and Family – Youth Justice Facilities, Upper North, Lower North and South and General Advice
- Telecom New Zealand Limited – Mobile Phone and Landline Infrastructure Developments, South Island
- Telecom New Zealand Limited – Policy Advice on District and Regional Plan Developments and Variations

APPENDIX B

Relevant objectives and policies of
the Operative Regional Policy Statement for Otago
and the Proposed Regional Policy Statement for Otago

Relevant objectives and policies in the Operative Otago Regional Policy Statement

5 Land

5.4 Objectives

5.4.1.

To promote the sustainable management of Otago's land resources in order:

- (a) To maintain and enhance the primary productive capacity and life-supporting capacity of land resources; and*
- (b) To meet the present and reasonably foreseeable needs of Otago's people and communities.*

5.4.2.

To avoid, remedy or mitigate degradation of Otago's natural and physical resources resulting from activities utilising the land resource.

5.4.3.

To protect Otago's outstanding natural features and landscapes from inappropriate subdivision, use and development.

5.4.4.

To ensure that public access opportunities exist in respect of activities utilising Otago's natural and physical land features.

5.5 Policies

5.5.6

To recognise and provide for the protection of Otago's outstanding natural features and landscapes which:

- (a) Are unique to or characteristic of the region; or*
- (b) Are representative of a particular landform or land cover occurring in the Otago region or of the collective characteristics which give Otago its particular character; or*
- (c) Represent areas of cultural or historic significance in Otago; or*
- (d) Contain visually or scientifically significant geological features; or*
- (e) Have characteristics of cultural, historical and spiritual value that are regionally significant for Tangata Whenua and have been identified in accordance with Tikanga Maori.*

9 Built Environment

9.4 Objectives

9.4.1.

To promote the sustainable management of Otago's built environment in order to:

- (a) Meet the present and reasonably foreseeable needs of Otago's people and communities; and*
- (b) Provide for amenity values; and*
- (c) Conserve and enhance environmental and landscape quality; and*
- (d) Recognise and protect heritage values.*

9.4.2.

To promote the sustainable management of Otago's infrastructure to meet the present and reasonably foreseeable needs of Otago's communities.

9.4.3.

To avoid, remedy or mitigate the adverse effects of Otago's built environment on Otago's natural and physical resources.

9.5 Policies

9.5.1

To recognise and provide for the relationship Kai Tahu have with the built environment of Otago through:

- (a) Considering activities involving papatipu whenua that contribute to the community and cultural development of Kai Tahu; and*
- (b) Recognising and providing for the protection of sites and resources of cultural importance from the adverse effects of the built environment.*

9.5.2

To promote and encourage efficiency in the development and use of Otago's infrastructure through:

- (a) Encouraging development that maximises the use of existing infrastructure while recognising the need for more appropriate technology; and*
- (b) Promoting co-ordination amongst network utility operators in the provision and maintenance of infrastructure; and*
- (c) Encouraging a reduction in the use of non-renewable resources while promoting the use of renewable resources in the construction, development and use of infrastructure; and*

- (d) *Avoiding or mitigating the adverse effects of subdivision, use and development of land on the safety and efficiency of regional infrastructure.*

9.5.3

To promote and encourage the sustainable management of Otago's transport network through:

- (a) *Promoting the use of fuel efficient modes of transport; and*
- (b) *Encouraging a reduction in the use of fuels which produce emissions harmful to the environment; and*
- (c) *Promoting a safer transport system; and*
- (d) *Promoting the protection of transport infrastructure from the adverse effects of landuse activities and natural hazards.*

9.5.4

To minimise the adverse effects of urban development and settlement, including structures, on Otago's environment through avoiding, remedying or mitigating:

- (a) *Discharges of contaminants to Otago's air, water or land; and*
- (b) *The creation of noise, vibration and dust; and*
- (c) *Visual intrusion and a reduction in landscape qualities; and*
- (d) *Significant irreversible effects on:*
 - (i) *Otago community values; or*
 - (ii) *Kai Tahu cultural and spiritual values; or*
 - (iii) *The natural character of water bodies and the coastal environment;*
or
 - (iv) *Habitats of indigenous fauna; or*
 - (v) *Heritage values; or*
 - (vi) *Amenity values; or*
 - (vii) *Intrinsic values of ecosystems; or*
 - (viii) *Salmon or trout habitat.*

9.5.5

To maintain and, where practicable, enhance the quality of life for people and communities within Otago's built environment through:

- (a) *Promoting the identification and provision of a level of amenity which is acceptable to the community; and*
- (b) *Avoiding, remedying or mitigating the adverse effects on community health and safety resulting from the use, development and protection of Otago's natural and physical resources; and*

- (c) *Avoiding, remedying or mitigating the adverse effects of subdivision, landuse and development on landscape values.*

9.5.6

To recognise and protect Otago's regionally significant heritage sites through:

- (a) *Identifying Otago's regionally significant heritage sites in consultation with Otago's communities; and*
- (b) *Developing means to ensure those sites are protected from inappropriate subdivision, use and development.*

Relevant objectives and policies in the Proposed Otago Regional Policy Statement

Objective 2.2

Otago's significant and highly-valued natural resources are identified, and protected or enhanced

Policy 2.2.4

Managing outstanding natural features, landscapes, and seascapes

Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by:

- a) *Avoiding adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and*
- b) *Avoiding, remedying or mitigating other adverse effects on other values; and*
- c) *Assessing the significance of adverse effects on values, as detailed in Schedule 3; and*
- d) *Recognising and providing for positive contributions of existing introduced species to those values; and*
- e) *Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and*
- f) *Encouraging enhancement of those areas and values.*

Policy 2.2.6

Managing special amenity landscapes and highly valued natural features

Protect or enhance the values of special amenity landscapes and highly valued natural features, by:

- a) *Avoiding significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and*
- b) *Avoiding, remedying or mitigating other adverse effects on other values; and*
- c) *Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and*

- d) *Recognising and providing for positive contributions of existing introduced species to those values; and*
- e) *Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and*
- f) *Encouraging enhancement of those values.*

Objective 3.4

Good quality infrastructure and services meet community needs

Policy 3.4.1

Integrating infrastructure with land use

Achieve the strategic integration of infrastructure with land use, by:

- a) *Recognising functional needs of infrastructure of regional or national importance; and*
- b) *Designing infrastructure to take into account:*
 - i. *Actual and reasonably foreseeable land use change; and*
 - ii. *The current population and projected demographic changes; and*
 - iii. *Actual and reasonably foreseeable change in supply of, and demand for, infrastructure services; and*
 - iv. *Natural and physical resource constraints; and*
 - v. *Effects on the values of natural and physical resources; and*
 - vi. *Co-dependence with other infrastructural services; and*
 - vii. *The effects of climate change on the long term viability of that infrastructure; and*
- c) *Managing urban growth:*
 - i. *Within areas that have sufficient infrastructure capacity; or*
 - ii. *Where infrastructure services can be upgraded or extended efficiently and effectively; and*
- d) *Co-ordinating the design and development of infrastructure with the staging of land use change, including with:*
 - i. *Structural design and release of land for new urban development; or*
 - ii. *Structural redesign and redevelopment within existing urban areas.*

Policy 3.4.2

Managing infrastructure activities

Manage infrastructure activities, to:

- a) *Maintain or enhance the health and safety of the community; and*
- b) *Reduce adverse effects of those activities, including cumulative adverse effects on natural and physical resources; and*
- c) *Support economic, social and community activities; and*
- d) *Improve efficiency of use of natural resources; and*
- e) *Protect infrastructure corridors for infrastructure needs, now and for the future; and*
- f) *Increase the ability of communities to respond and adapt to emergencies, and disruptive or natural hazard events; and*
- g) *Protect the functioning of lifeline utilities and essential or emergency services.*

Policy 3.4.3

Designing lifeline utilities and facilities for essential or emergency services

Design lifeline utilities, and facilities for essential or emergency services, to:

- a) *Maintain their ability to function to the fullest extent possible, during and after natural hazard events; and*
- b) *Take into account their operational co-dependence with other lifeline utilities and essential services to ensure their effective operation.*

Policy 3.4.4

Managing hazard mitigation measures, lifeline utilities, and essential and emergency services

Protect the functioning of hazard mitigation measures, lifeline utilities, and essential or emergency services, including by:

- a) *Restricting the establishment of those activities that may result in reverse sensitivity effects; and*

- b) *Avoiding significant adverse effects on those measures, utilities or services; and*
- c) *Avoiding, remedying or mitigating other adverse effects on those measures, utilities or services; and*
- d) *Assessing the significance of adverse effects on those measures, utilities or services, as detailed in Schedule 3; and*
- e) *Maintaining access to those measures, utilities or services for maintenance and operational purposes; and*
- f) *Managing other activities in a way that does not foreclose the ability of those mitigation measures, utilities or services to continue functioning.*

Objective 3.5

Infrastructure of national and regional significance is managed in a sustainable way

Policy 3.5.1

Recognising national and regional significance of infrastructure

Recognise the national and regional significance of the following infrastructure:

- a) *Renewable electricity generation facilities, where they supply the national electricity grid and local distribution network; and*
- b) *Electricity transmission infrastructure; and*
- c) *Telecommunication and radio communication facilities; and*
- d) *Roads classified as being of national or regional importance; and*
- e) *Ports and airports; and*
- f) *Structures for transport by rail.*

Policy 3.5.2

Managing adverse effects of infrastructure that has national or regional significance

Minimise adverse effects from infrastructure that has national or regional significance, by:

- a) *Giving preference to avoiding their location in:*

- i. *Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and*
- ii. *Outstanding natural features, landscapes and seascapes; and*
- iii. *Areas of outstanding natural character; and*
- iv. *Outstanding water bodies or wetlands; and*
- b) *Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and*
- c) *Avoiding, remedying or mitigating other adverse effects on values; and*
- d) *Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and*
- e) *Considering the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity*

Policy 3.5.3

Protecting infrastructure of national or regional significance

Protect infrastructure of national or regional significance, by:

- a) *Restricting the establishment of activities that may result in reverse sensitivity effects; and*
- b) *Avoiding significant adverse effects on the functional needs of such infrastructure; and*
- c) *Avoiding, remedying or mitigating other adverse effects on the functional needs of such infrastructure; and*
- d) *Assessing the significance of adverse effects on those needs, as detailed in Schedule 3; and*
- e) *Protecting infrastructure corridors for infrastructure needs, now and for the future.*

Objective 3.6

Energy supplies to Otago's communities are secure and sustainable

Policy 3.6.1

Using existing renewable electricity generation structures and facilities Give preference to the use of existing structures or facilities to increase the region's renewable electricity generation capacity over developing new structures in new locations.

Policy 3.6.2

Promoting small scale renewable electricity generation

Promote small scale renewable electricity generation activities that:

- a) *Increase the local community's resilience and security of energy supply; and*
- b) *Avoid, remedy or mitigate adverse effects from that activity.*

Policy 3.6.3

Protecting the generation capacity of renewable electricity generation activities

Protect the generation capacity of nationally or regionally significant renewable electricity generation activities, by:

- a) *Recognising the functional needs of renewable electricity generation activities, including physical resource supply needs; and*
- b) *Restricting the establishment of those activities that may result in reverse sensitivity effects; and*
- c) *Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and*
- d) *Assessing the significance of adverse effects on those needs, as detailed in Schedule 3*

Policy 3.6.4

Enabling more efficient transport of electricity

Enable electricity transmission and distribution infrastructure activities that:

- a) *Maintain or improve the security of supply of electricity; or*
- b) *Enhance the efficiency of transporting electricity; and*
- c) *Avoid, remedy or mitigate adverse effects from that activity.*

Policy 3.6.5

Protecting electricity distribution infrastructure

Protect electricity distribution infrastructure, by:

- a) Recognising the functional needs of electricity distribution activities; and*
- b) Restricting the establishment of those activities that may result in reverse sensitivity effects; and*
- c) Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and*
- d) Assessing the significance of adverse effects on those needs, as detailed in Schedule 3; and*
- e) Protecting existing distribution corridors for infrastructure needs, now and for the future.*

Policy 3.6.6

Reducing long term demand for fossil fuels

Reduce the long term demand for fossil fuels from Otago's communities, by:

- a) Encouraging the development of compact and well integrated urban areas, to reduce travel needs within those areas; and*
- b) Ensuring that transport infrastructure in urban areas has good connectivity, both within new urban areas and between new and existing urban areas, by:
 - i. Placing a high priority on walking, cycling, and public transport, where appropriate; and*
 - ii. Maximising pedestrian and cycling networks connectivity, and integration with public transport; and*
 - iii. Having high design standards for pedestrian and cyclist safety and amenity; and**
- c) Enabling the development or upgrade of transport infrastructure and associated facilities that:
 - i. Increase freight efficiency; or*
 - ii. Foster the uptake of new technologies for more efficient energy uses, or renewable or lower emission transport fuels.**