

BEFORE THE DISTRICT HEARINGS PANEL

Under the Resource Management Act 1991

In the matter of

**Proposed Queenstown Lakes District Plan – Chapter 3
Strategic Directions, Chapter 4 Urban Development, and
Chapter 6 Landscape**

and

Transpower New Zealand Limited (Submitter 805)

Submitter

**Memorandum of Counsel on behalf of Transpower New
Zealand Limited dated 30 March 2016**

BELL GULLY

BARRISTERS AND SOLICITORS
AJLBEATSON/ NJ GARVAN
AUCKLAND LEVEL 22, VERO CENTRE, 48 SHORTLAND STREET
PO BOX 4199, AUCKLAND 1140, DX CP20509, NEW ZEALAND
TEL 64 9 916 8800 FAX 64 9 916 8801

May it Please the Hearings Panel:

1. We refer to the minute from the Hearings Panel dated 23 March 2016 allowing comments on a number of documents, including the Expert Witness Conferencing Statement filed on 22 March 2016 (the **Statement**).
2. Transpower New Zealand Limited (**Transpower**) generally supports the inclusion of the additional provisions in the Statement as Chapter 3 – Strategic Directions does not currently provide for, and recognise nationally significant infrastructure. However, we consider these provisions do not give effect to the National Policy Statement on Electricity Transmission 2008 (**NPSET**). Although, we acknowledge that may have not been the intention of the relevant experts.
3. Transpower continues to support the inclusion of National-Grid specific policies as included in the addendum to legal submissions dated 21 March 2016, and as set out below. We also note the goal proposed in the Statement will require amendments to give effect to the NPSET, and encompass broader infrastructure goals.

Amendments proposed by Transpower

4. Transpower proposes the following new policies in Chapter 3 to address its concerns that the chapter does not give effect to the NPSET:
 - (a) Provide for the benefits derived from the National Grid by enabling its operation, maintenance, upgrading and development.
 - (b) Managing activities to avoid adverse effects on the National Grid, including by identifying a buffer corridor within which sensitive and other incompatible activities will generally not be provided for.
 - (c) Recognise the extent to which any adverse effects of the development of the National Grid are addressed through route, site and method selection while acknowledging that the

avoidance, remediation or mitigation of any adverse effects of the National Grid is constrained by its technical, locational and operational requirements.

5. Transpower proposes inclusion of the following new policy in Chapter 6 (as an alternative to other relief sought in relation to Chapter 6 and the landscape provisions in Chapter 3):

New National Grid infrastructure or major upgrades of existing National Grid infrastructure should seek to avoid adverse effects on Outstanding Natural Landscapes and Features, and Rural Landscapes while:

- (a) Considering the constraints imposed on achieving measures to manage environmental effects of National Grid infrastructure by the technical, locational and operational requirements of the network; and
- (b) Having regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site, and method selection.



AJL Beatson/ N J Garvan
Counsel for Transpower New Zealand Limited

30 March 2016