



Attachment 1.3

Proposed provisions – Amendments to the National Policy Statement on Electricity Transmission 2008

National direction consultation – Package 1: Infrastructure and development

Instrument topic: Proposed amendments to the National Policy Statement on Electricity Transmission (NPS-ET) (to be renamed National Policy Statement for Electricity Networks (NPS-EN))

- The proposed definitions and policies below are intended to replace all definitions and policies in the [operative NPS-ET](#).
- The proposed provisions are for consultation purposes and do not represent the proposed National Policy Statement (NPS) wording, which will be drafted after the consultation phase.
- The table below provides some illustrative wording (in italics) to help you understand proposed definitions, the policy intent, and scope of the proposed amendments to the NPS-ET (to be renamed NPS-EN).
- Given the substantial amendments to the current instrument, the numbering of the proposed provisions does not correspond with the same numbering of the existing NPS-ET.
- Terms used have the same meaning as in the Resource Management Act 1991 and National Planning Standards, unless otherwise specified.
- Changes to the existing NPS-ET are referenced using the existing policy or other clause number. To help submitters, the proposed new objectives and policies are referenced using the following abbreviations: D (new definition), O (new objective), P (new policy) and IM (new implementation measure).

Application	Proposed provisions	Reasons
Where is it intended to apply?	<p>This NPS is proposed to continue to apply to the whole of New Zealand.</p> <p>The scope of the NPS-ET is proposed to be expanded to include electricity distribution and will be renamed the National Policy Statement for Electricity Networks (NPS-EN).</p>	Meeting New Zealand's climate and electrification targets through the efficient transmission and distribution of electricity is a nationally significant issue.

Definitions/interpretation	Proposed provisions	Reasons
D1 Act	<i>means the Resource Management Act 1991.</i>	This is an existing definition in the NPS-ET 2008 and is needed to avoid repetition of references to the Resource Management Act 1991 (RMA).
D2 Ancillary electricity network activities (ancillary EN activities)	<p>Introduce a definition for 'ancillary EN activities' that:</p> <p><i>means all supporting and subsidiary activities needed to provide the operation, maintenance and upgrading of the EN, including but not limited to vegetation clearance, tree trimming, earthworks, the construction, maintenance and upgrading of access tracks and accessways, power supply, and telecommunications.</i></p>	The intent of this definition is to ensure that all relevant ancillary activities are captured as part of the overall electricity network (EN) activity.
D3 Customer Driven Projects	<p>Introduce a definition for 'customer driven projects' that:</p> <p><i>means ETN or EDN activities that a third party other than Transpower New Zealand Limited or an electricity distribution business has requested be carried out, such as new connections to electricity generation or demand, or relocation or undergrounding of assets in order to enable urban or infrastructure development, excluding new connections to electricity generation that are managed under the National Policy Statement for Renewable Electricity Generation (NPS-REG).</i></p>	<p>The intent is to exclude renewable energy generation (REG) connections managed under the NPS-REG, which will require assessment of the effects of the full REG project up to the point of connection to the electricity transmission network (ETN) or electricity distribution network (EDN). The exclusion of new REG connections clarifies the applicability of the NPS, rather than a decision-maker needing to apply both the NPS-REG and NPS-EN.</p> <p>This definition also forms part of the definition of 'electricity network development activities'.</p>

Definitions/interpretation	Proposed provisions	Reasons
D4 Decision-makers	Amend the definition: <i>means all those persons making planning decisions under this National Policy Statement.</i>	This definition would not result in a material change from the definition in the current NPS-ET but would change how policies are framed to refer to decision-makers rather than planning decisions.
D5 Electricity distribution network (EDN)	Introduce a definition that: <i>means any part of the electricity network that is controlled by a person or body who is both an electricity distributor and an electricity operator because those terms are defined in section 2 of the Electricity Act 1992; and does not include the electricity transmission network (as defined below).</i>	This definition proposes to introduce the EDN into the NPS, recognising the importance of the EDN for electrification (eg, new lines supporting electrification of industry rather than fossil fuel use).
D6 Electricity network (EN)	Introduce a definition that: <i>means the electricity transmission network and the electricity distribution network.</i>	The proposed definition is inclusive of both the ETN and EDN and is needed to interpret policy applying to both parts of the electricity network.
D7 Electricity transmission network (ETN)	Introduce a definition that: <i>means all parts of the National Grid of electricity transmission that:</i> <ul style="list-style-type: none"> <i>a) comprise the network of transmission lines, and cables (aerial, underground, and submarine, including the high-voltage direct current link), stations, and substations, facilities and works, and all ancillary activities, and other works used to connect grid injection points and grid exit points to convey electricity;</i> <i>b) is owned or used by Transpower New Zealand Limited; and</i> <i>c) is commonly known as the National Grid.</i> 	The proposed definition of 'National Grid' is more specific than the definition in the current NPS-ET about the assets and infrastructure it includes. It is proposed to include ancillary activities (see definition D2) essential to enabling necessary work on Transpower New Zealand's assets.
D8 Electricity network activities (EN activities)	Introduce a definition that: <i>means the construction, operation, maintenance, development, upgrade, replacement, decommissioning or removal of electricity network assets and all ancillary activities, unless otherwise specified.</i>	The proposed definition for electricity network activities will be more specific about the activities and infrastructure it includes than the definition in the current NPS-ET. The intent is to be more inclusive and recognise activities associated with the lifecycle of the EN including access associated with routine maintenance activities.
D9 Electricity network assets (EN assets)	Introduce a definition that: <i>means the physical components of EN and all ancillary activities, such as access tracks.</i>	This definition is proposed to be more specific about the assets and infrastructure included as part of the EN.

Definitions/interpretation	Proposed provisions	Reasons
D10 Electricity network development activities (EN development activities)	<p>Introduce a definition that:</p> <p><i>means</i></p> <p>a) <i>the construction of new EN assets that is not carried out on or related to EN lines, or cables, or at substation sites, that exist at the time of construction; or</i></p> <p>b) <i>customer driven projects.</i></p>	<p>The intent of this definition is to help distinguish ‘routine activities’ and ‘non-routine activities’, and to clarify that ‘development activities’ relate to new lines or assets. This is specifically relevant for the interpretation of policies 5, 7 and 9.</p>
D11 Electricity network line (EN line)	<p>Introduce a definition that:</p> <p><i>means EN assets used for, or associated with, the overhead, underground or submarine transmission or distribution of electricity in the EN and:</i></p> <p>a) <i>includes transmission line support structures, telecommunication cables, and telecommunication devices; but</i></p> <p>b) <i>does not include an EN substation.</i></p>	<p>This definition is proposed to clarify terminology used in the definition of EN development activities.</p>
D12 Functional need	<p>Introduce a definition that:</p> <p><i>means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.</i></p>	<p>This is the same definition as in the NPS-ET, and is included for ease of reference.</p>
D13 Non-routine electricity network activities (non-routine EN activities)	<p>Introduce a definition that:</p> <p><i>means the upgrade, rebuilding or replacement of, or changes to, EN assets, or other EN activities, where the upgrade, rebuilding, replacement or change, or activity is not defined as a routine EN activity.</i></p>	<p>This definition reflects the policy intent to distinguish between activities carried out regularly as part of the life cycle of the EN, which usually have less than minor effects, and activities that may result in more substantial effects and changes to the EN.</p> <p>The intent is that:</p> <ul style="list-style-type: none"> • ‘non-routine’ EN activities cover larger upgrades with more than minor adverse effects and policy 7 applies • ‘routine’ covers more minor or common upgrade activities and these are subject to more enabling policy direction in policy 6.
D14 NZECP 34:2001	<p>Introduce a definition that:</p> <p><i>means the New Zealand Electrical Code of Practice for Electrical Safe Distances (2001)</i></p>	<p>This definition would introduce a hook for electrical safety standards. We are seeking feedback on whether the RMA is the best means to enforce these provisions and the appropriateness of referring to compliance with all or some of the third party code in the proposed National Environmental Standards for Electricity Network Activities (NES-ENA).</p>

Definitions/interpretation	Proposed provisions	Reasons
D15 Operational need	Introduce a definition that: <i>means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints (National Planning Standards definition).</i>	It is the same definition as in the National Planning Standards, included for ease of reference and used in policy 2 and policy 4.
D16 Planning decision	Introduce a definition that: <i>means a decision on any of the following:</i> <ul style="list-style-type: none"> a) a regional policy statement or proposed regional policy statement; b) a regional plan or proposed regional plan; c) a district plan or proposed district plan; d) a resource consent; e) a designation; f) a heritage order; g) a water conservation order; h) a change to a plan requested under Part 2 of Schedule 1 of the Act. 	This definition is intended to clarify what planning decisions the decision-maker has authority over.
D17 Electricity network resilience (EN resilience)	Introduce a definition that: <i>means the capacity of infrastructure to absorb a shock, including from natural hazards, recover from the disruption, adapt to changing conditions, including climate change, and retain an appropriate level of service, even if that means delivering an infrastructure service in a new or different way, or at a reduced level of service.</i>	The intent of this definition is to clarify the meaning of ‘resilience’ to assist with implementing the NPS-EN objective, and policy 1 and policy 2. It is intended to be aligned with the definition proposed in the NPS-REG, proposed National Policy Statement for Infrastructure and the Department of the Prime Minister and Cabinet work on critical infrastructure.
D18 Routine electricity network activities (routine EN activities)	Introduce a definition that: <i>means that:</i> <ul style="list-style-type: none"> a) activities required for, or associated with, the operation or maintenance of existing EN assets or; b) implements the modern equivalent, substitute, or replacement of the existing EN assets that may not be ‘like for like’; or c) maintenance and upgrades of existing EN assets necessary to continue to deliver the same or a similar level of service or to improve resilience; or 	<p>The policy intent is to enable routine ETN activities on existing assets to occur in a timely and efficient way without restriction, while still ensuring Transpower and electricity distribution businesses (EDBs) take appropriate steps to avoid or mitigate adverse environmental effects to the extent practicable. Transpower and EDBs have well-established industry standards and operating procedures for routine operation, maintenance and upgrade activities developed with input from ecologists and other environmental experts.</p> <p>Provides a link to make clear that the definition includes all activities regulated under the proposed NES-ENA.</p>

Definitions/interpretation	Proposed provisions	Reasons
	<p>d) <i>other upgrades of existing EN assets where the upgrade or other change will, once the activity is complete, have no more than minor adverse effects on the environment; or</i></p> <p>e) <i>the removal, decommissioning or dismantling of EN assets; and</i></p> <p>f) <i>all relevant ancillary activities, such as vegetation clearance, tree trimming, and creating, maintaining and improving access tracks and accessways to EN assets; and</i></p> <p>g) <i>includes all activities regulated by the National Environmental Standards for Electricity Network Activities NES-ENA, including replacing structures, reconductoring, earthworks, altering or relocating of structures and undergrounding.</i></p>	
D19 Sensitive activities	<p>Introduce a definition that:</p> <p><i>includes residential unit (including visitor accommodation and retirement accommodation), care facilities, childcare facilities, schools, hospitals, custodial or supervised accommodation where residents are detained on site, marae, or place of worship.</i></p>	<p>This definition assists with interpretation of policy 11, seeking to manage the effects of third parties on the EN. The existing NPS-ET definition has been expanded to make it clear what the definition includes and align with terms used in the National Planning Standards.</p>
D20 Upgrading	<p>Introduce a definition that:</p> <p><i>means improving the capacity, level of service, efficiency, safety, security, resilience, effectiveness or longevity of existing EN assets and includes the replacement, renewal, addition, expansion and intensification of existing infrastructure.</i></p>	<p>The intent of this definition is that it is broad and captures all types of upgrades and can help to streamline drafting. This includes both minor (routine) upgrades and larger upgrades (non-routine).</p>
D21 Well-being	<p>Introduce a definition that:</p> <p><i>means the environmental, economic, social and cultural well-being of people and communities, and includes their health and safety.</i></p>	<p>The intent is to assist with interpretation of the objective, policy 1 and policy 3 of the proposed NPS-EN.</p>

PART 2: OBJECTIVES AND POLICIES		
Objectives	Proposed provisions	Reasons
OB1	<p>Amend the objective as follows:</p> <p>1) The EN is developed, operated, maintained, upgraded, and protected in a manner that:</p>	<p>The objective in the current NPS-ET is outdated and was developed before New Zealand's targets for reducing emissions became law. Electrification of the economy is the most important enabler for decarbonising New Zealand's energy system.</p>

PART 2: OBJECTIVES AND POLICIES

Objectives	Proposed provisions	Reasons
	<p><i>a) recognises and provides for its national significance;</i></p> <p><i>b) secures the resilience of the EN, including in relation to the effects of natural hazards and climate change;</i></p> <p><i>c) provides for the well-being and needs of present and future generations, including by increasing and improving the capacity and delivery of the EN over time;</i></p> <p><i>d) recognises and provides for the role of the EN in achieving New Zealand's emissions reduction and renewable energy targets, and associated commitments in any relevant plan prepared under the Climate Change Response Act 2002;</i></p> <p><i>e) manages adverse effects on the environment in a proportionate and cost-effective way; and</i></p> <p><i>f) protects the EN from the adverse effects of other activities.</i></p>	<p>The intent of the proposed objectives is to:</p> <ul style="list-style-type: none"> strengthen the objective to recognise the importance of the EN and its role in decarbonisation and electrification of the economy emphasise the beneficial outcomes of EN while recognising the need to expand and upgrade it to meet targets and future demand highlight that increasing and improving capacity must be done in a way that also manages adverse effects on the environment extend application of provisions to provide national direction for electricity distribution.
Policies	Proposed provisions	Reasons
P1 National significance and benefits of the electricity network	<p>Amend policy 1 as follows:</p> <p>1) <i>Decision-makers on EN activities must recognise and provide for the national significance and benefits of the EN to be realised at national, regional and local scale.</i></p> <p>2) <i>Decision-makers must recognise that the benefits of the EN include, but are not limited to:</i></p> <p><i>a) providing for the well-being of people and communities to meet the needs of present and future generations;</i></p> <p><i>b) providing services that are essential to support human life and the development, growth, and functioning of districts, regions, New Zealand, and the economy;</i></p> <p><i>c) providing safe, secure, reliable, and resilient electricity supply that is responsive to demand from homes, communities, and businesses at local, regional, and national levels;</i></p> <p><i>d) efficient storage and transfer of electricity;</i></p>	<p>This amends policy 1 of the current NPS-ET.</p> <p>Many of the existing policies in the NPS-ET are not directive enough to achieve the amended NPS objective. The proposed amendments are intended to:</p> <ul style="list-style-type: none"> strengthen the requirement for decision-makers to consider the national significance of the entire electricity network and enable the full range of national, regional and local benefits. give greater recognition to the critical role the EN has in New Zealand's economy and in meeting emissions targets and budgets.

Policies	Proposed provisions	Reasons
	<p><i>e) supporting reductions in greenhouse gas emissions and the electrification of the economy, including by:</i></p> <ul style="list-style-type: none"> <i>i. facilitating new renewable electricity generation;</i> <i>ii. increasing network capacity; and</i> <i>iii. providing direct connections for industry;</i> <p><i>f) enhancing supply of electricity through the ETN through removing points of congestion.</i></p> <p><i>The above list of benefits is not intended to be exhaustive and a particular project or development may have other benefits.</i></p>	
P2 Operational need or functional need for EN activities to be in particular locations and environments	<p>Includes a new policy 2 as follows:</p> <ol style="list-style-type: none"> <i>1) Planning decisions must recognise and provide for EN activities that have an operational need or functional need to be in particular environments, including in areas with section 6 RMA values, with unavoidable adverse effects on those environments.</i> <i>2) Decision-makers shall recognise that the operational or functional need of EN activities may include:</i> <ol style="list-style-type: none"> <i>a) the need for EN assets to convey electricity over long distances and in all locations and environments, including:</i> <ul style="list-style-type: none"> <i>i. within and across urban and rural environments;</i> <i>ii. within the coastal environment, including the coastal marine area;</i> <i>iii. across jurisdictional boundaries within and across districts and regions; and</i> <i>b) the need for the EN to operate effectively and efficiently as an interconnected system across New Zealand;</i> <i>c) the requirement for regular maintenance and upgrading of the EN due to its age, the need to improve resilience, and the need to increase capacity to meet increasing demand; and</i> <i>d) the need for the EN to connect to electricity generation, and to respond to demand, wherever located.</i> 	<p>This is proposed to amend policy 3 of the NPS-ET.</p> <p>The intent is to recognise the specific technical, operational and functional needs of the electricity network, incorporating some of the current NPS-ET preamble into clear policy direction.</p>

Policies	Proposed provisions	Reasons
P3 Policies relating to Māori rights and interests	<p>Include a new policy 3 as follows:</p> <ol style="list-style-type: none"> 1) <i>Decision-makers (and applicants, as appropriate) must recognise and provide for Māori interests in relation to EN activities, including by:</i> <ol style="list-style-type: none"> a) <i>taking into account the outcomes of any engagement with tangata whenua on a resource consent, notice of requirement, or request for a private plan change, including through the site, route and method selection process;</i> b) <i>recognising the opportunities tangata whenua may have in developing and operating their own distribution infrastructure at any scale or in partnership;</i> c) <i>avoiding, where practicable, or otherwise mitigating, the adverse effects of EN activities on sites of significance to Māori;</i> d) <i>operating in a way that is consistent with iwi participation legislation.</i> 	<p>This is a new policy proposal.</p> <p>The proposed amendments are based on the current NPS Urban Development, with modifications to reflect linear network planning processes and constraints.</p> <p>The intent is to recognise and provide for Māori interests by supporting early and meaningful engagement with tangata whenua, particularly in the route and site selection process where adverse effects can be best addressed.</p> <p>Policy d) does not exclude participation under the Marine and Coastal Areas Act 2011 or in Mana Whakahono ā Rohe. Policies 4(a)–(c) apply to decision-makers and only policy 4(d) applies to applicants.</p>

SUBPART 2: POLICIES FOR ENABLING ELECTRICITY NETWORK ACTIVITIES WHILE MANAGING ADVERSE EFFECTS ON THE ENVIRONMENT		
Clauses	Proposed provisions	Reasons
P4 Identifying the location for EN activities and managing adverse effects through the route, site, and method selection process	<p>Amend policy 4 as follows:</p> <ol style="list-style-type: none"> 1) <i>Decision-makers must:</i> <ol style="list-style-type: none"> a) <i>recognise that it is the role of Transpower and the EDN provider to:</i> <ol style="list-style-type: none"> i. <i>determine the purpose, scope, required capacity, and technical solution for a proposed EN activity; and</i> ii. <i>consider sites, routes, and methods where appropriate and identify the preferred site, route, and method for EN activities and assets;</i> b) <i>recognise and provide for the operational need or functional need of EN activities to be in particular environments as directed by policy 2 in this National Policy Statement;</i> c) <i>have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site, and method selection;</i> 	<p>This amends policy 4 of the current NPS-ET.</p> <p>The NPS-ET provides no policy direction on how to manage conflicts between EN and environmental values. This has created complexity for decision-makers, who must interpret conflicting national direction, and uncertainty for EN developers.</p> <p>Proposed policy 4 and policy 5 in the NPS-EN provide general direction on how to manage the potential adverse effects that EN activities could have on the environment. The intent is to clarify the role of EN providers in route and method selection processes and that adverse effects on values may be unavoidable, given the bulk and scale of the EN, particularly the ET infrastructure.</p>

SUBPART 2: POLICIES FOR ENABLING ELECTRICITY NETWORK ACTIVITIES WHILE MANAGING ADVERSE EFFECTS ON THE ENVIRONMENT

Clauses	Proposed provisions	Reasons
	<i>d) recognise that there will be unavoidable adverse effects on some values regardless of the route, site, and method chosen.</i>	
P5 General considerations when considering and managing the environmental effects of EN activities	<p>Include a new policy 5 as follows:</p> <ol style="list-style-type: none"> 1) <i>When considering the environmental effects of EN activities and measures to avoid, remedy, or mitigate any adverse effects on the environment, decision-makers must also:</i> <ol style="list-style-type: none"> a) <i>consider the constraints imposed on achieving those measures by the technical and operational requirements of the EN;</i> b) <i>recognise that EN activities are needed to increase and improve the capacity and delivery of the EN over time;</i> c) <i>recognise that changes in amenity from EN activities are unavoidable and necessary to achieve an effective, efficient, safe, secure, reliable, and resilient EN;</i> d) <i>adopt relevant international and national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and</i> e) <i>consider the financial and timing implications of mitigation measures and any consent conditions to ensure these are proportionate and cost-effective.</i> 	<p>This is a new policy that incorporates some of the current NPS-ET preamble and existing policy 3 into clear policy direction.</p> <p>Read in conjunction with policy 4, proposed policy 5 provides more general direction about the management of environmental effects, ensuring that conditions are proportionate and cost-effective. It also recognises that an increase in EN activities is required and some changes in amenity values may be unavoidable.</p>
P6 Enabling routine EN activities	<p>Include a new policy 6 as follows:</p> <ol style="list-style-type: none"> 1) <i>Decision-makers must enable routine EN activities to occur in all locations and environments, provided adverse effects on the environment are avoided where practicable, remedied where practicable, or mitigated where practicable, acknowledging the existing nature of the assets.</i> 	<p>This amends policy 2 of the current NPS-ET.</p> <p>This proposed amendment references the proposed NES-ENA works category definition and is intended to be an enabling policy that allows routine EN activities on existing infrastructure in all locations, with no threshold of adverse effects to be avoided.</p> <p>The intent is to enable routine EN activities to occur in a timely and efficient way without restriction, while still ensuring Transpower and EDBs take appropriate steps to avoid or mitigate adverse environmental effects to the extent practicable using industry standards and operating procedures (eg, as directed by policy 5 above). Transpower and EDBs have well-established industry standards and operating procedures for routine</p>

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Clauses	Proposed provisions	Reasons
		<p>operation, maintenance and upgrade activities developed with input from ecologists and other environmental experts.</p> <p>In some situations, this policy will need to be considered alongside a more restrictive policy in other national direction instruments, for example, provisions in the New Zealand Coastal Policy Statement 2010 for the coastal environment and in the National Policy Statement for Freshwater Management for natural inland wetlands.</p> <p>We are seeking feedback on whether the direction for work on existing infrastructure in 'all environments' needs to be modified to avoid conflicts with other national direction.</p>
P7 EN development and non-routine activities	<p>Include a new policy 7 as follows:</p> <p>1) <i>In rural environments, planning and development of the EN should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity.</i></p>	<p>This amends policy 8 in the current NPS-ET so that it only applies to EN development activities and non-routine EN activities (routine EN activities are covered by policy 6), to expand coverage to the EDN and remove reference to sensitive activities, which are covered in Part 3.3 of the proposed NPS-EN below.</p> <p>The policy applies to EN development and non-routine EN activities with likely larger scale effects. The existing policy 8 in the NPS-ET, which addresses effects management on a subset of section 6 RMA values, has largely been retained for consistency. The intent is that this does not change how existing NPS-ET policy 8 is being interpreted and implemented nationally, including existing National Grid policies in lower order plans, which apply to a wider range of section 6 values than those specifically listed in the policy. This policy would continue to be read together with existing national direction (with the exception of the National Policy Statement for Indigenous Biodiversity for electricity transmission).</p>
P8 Reducing existing adverse effects of EN assets when considering upgrades	<p>Include a new policy 8 as follows:</p> <p>1) <i>Decision-makers must consider practicable opportunities and measures to reduce the existing adverse effects of EN assets when considering non-routine EN activities, taking into account the technical and operational requirements of the EN and the financial implications of any measures to reduce adverse effects.</i></p>	<p>This amends policy 6 of the current NPS-ET.</p> <p>The proposed policy 8 is intended to support decision-makers when considering substantial upgrades on existing EN infrastructure, and would not be applied to all upgrades. It would also provide some degree of certainty to network operators on selection of their project option.</p>

SUBPART 2: POLICIES FOR ENABLING ELECTRICITY NETWORK ACTIVITIES WHILE MANAGING ADVERSE EFFECTS ON THE ENVIRONMENT

Clauses	Proposed provisions	Reasons
		Existing direction on sensitive activities in NPS-ET policy 6 is now included in Part 3.3 NPS-EN.
P9 EN activities within urban environments and servicing new development	<p>Include a new policy 9 as follows:</p> <ol style="list-style-type: none"> 1) <i>Decision-makers on EN activities within urban environments must:</i> <ol style="list-style-type: none"> a) <i>recognise that the EN forms an essential part of well-functioning urban environments that must be provided for;</i> b) <i>allow for changes in amenity associated with routine EN activities;</i> c) <i>recognise that it is not practicable to avoid all adverse effects of EN activities; and</i> d) <i>recognise that the effective and efficient development, operation, maintenance, and upgrade of the EN may be appropriate use and development when protecting historic heritage.</i> 2) <i>Planning decisions within urban environments must:</i> <ol style="list-style-type: none"> a) <i>ensure that, where development will result in an increase in demand for electricity, sufficient on-site space is provided for EDN assets to meet demand; and</i> b) <i>recognise that determining whether there is sufficient on-site space for EDN assets to meet demand will require consultation with the EDN provider.</i> 	<p>This is a new policy.</p> <p>Proposed policy 9 is intended to provide direction in urban environments, recognising that this is often a particular issue for EN activities to be able to expand the electricity system to meet and support existing and anticipated electricity demand. It would also guide decision-makers to consider whether new developments have appropriately considered EN activities.</p>

SUBPART 3: POLICIES FOR PROTECTION AND STRATEGIC PLANNING OF THE ELECTRICITY NETWORK

Clauses	Proposed provisions	Reasons
P10 Managing the effects of third parties on the electricity network	<p>Include a new policy 10 as follows:</p> <ol style="list-style-type: none"> 1) <i>Decision-makers must avoid the adverse effects of third parties on the EN, including by:</i> <ol style="list-style-type: none"> a) <i>avoiding direct and reverse sensitivity effects on the EN to the extent reasonably possible; and</i> 	<p>This amends and expands policy 10 and policy 11 in the current NPS-ET.</p> <p>The intent of policy 10 is to clearly set out how third party effects on the EN are to be managed, recognising the significance of the EN. The policy includes the National Grid Yard rules, National Grid Subdivision Corridor rules, and rules to protect EDN from third parties in the amended NES-ENA.</p>

SUBPART 3: POLICIES FOR PROTECTION AND STRATEGIC PLANNING OF THE ELECTRICITY NETWORK

Clauses	Proposed provisions	Reasons
	<p><i>b) ensuring that the effective operation, maintenance, upgrading, and development of the EN is not compromised.</i></p> <p>2) <i>In order to avoid the adverse effects of third parties on the EN, local authorities must:</i></p> <p><i>a) identify EN assets within their district, whether or not these are designated;</i></p> <p><i>b) engage with the operator of the ETN to implement the buffer corridor provided for in NES-ENA, within which it can be expected that sensitive activities, buildings, earthworks, and other activities that have the potential to compromise the EN, are to be generally avoided; and</i></p> <p><i>c) engage with the operators of the EDN to identify an appropriate buffer corridor for the EDN, within which buildings, subdivision, and earthwork activities must comply with NZECP34; and</i></p> <p><i>d) require buildings, structures, earthworks, and activities to avoid adverse effects on the EN, including reverse sensitivity effects, and to be designed and located to maintain safe distances from, and allow sufficient space for access to, and maintenance, construction, development, and upgrading of, EN assets;</i></p> <p><i>e) manage subdivision to avoid adverse effects on the EN while providing for ongoing and efficient construction, operation, maintenance, development, and upgrade of the EN;</i></p> <p><i>f) ensure the nature and location of any proposed trees or vegetation to be planted around the EN does not compromise its function and operation.</i></p>	<p>The option presented includes more directive policy to ‘avoid’ adverse effects of third parties on the EN. This protects the investment in the EN and enables it to be maximised.</p> <p>Further considerations on this proposal are as follows.</p> <ul style="list-style-type: none"> • Should the direction to identify EDN assets be limited to critical assets or some threshold of asset so that all parts of the network do not need to be identified? • Should the NPS-EN set out some minimum requirements on the EDN assets that must be identified (eg, 33 kV lines and above)? • Should the buffer corridor provisions for ETN be extended to the high-voltage (eg, 110 kV) EDN lines owned and/or operated by EDB (note this is different from the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP compliance rules proposed in the NES-ENA).
P11 Long-term strategic planning for the EN	<p>Include a new policy 11 as follows:</p> <p>1) <i>Local authorities must:</i></p> <p><i>a) engage with the operators of the EN to facilitate the medium to long-term strategic planning for the construction, operation, maintenance, and upgrade of the EN; and</i></p>	<p>This amends policies 12, 13 and 14 of the existing NPS-ET. This policy seeks to ensure future development strategies and other spatial planning documents consider the potential for bulk electricity distribution infrastructure, particularly in existing urban areas identified for medium to high intensity development. This reflects the difficulty of the sector to find appropriate sites in rapidly intensifying urban areas and that electricity supply is crucial to redevelopment. Application of this policy could include</p>

SUBPART 3: POLICIES FOR PROTECTION AND STRATEGIC PLANNING OF THE ELECTRICITY NETWORK

Clauses	Proposed provisions	Reasons
	<i>b) recognise that the designation process can facilitate long-term planning for construction, operation, maintenance, and upgrade and development of the EN.</i>	proactive engagement by urban regeneration agencies (such as Eke Panuku Development Auckland), facilitating land availability (via commercial agreement) where large areas are being redeveloped in bulk.
P12 Electric and magnetic fields	<p>Include a new policy 12 as follows:</p> <p>1) <i>Local authorities must include provisions in their district plans to manage electric or magnetic fields associated with the EN that are based on recommendations from the World Health Organization monograph Environmental Health Criteria (No 238, Extremely low frequency fields) and International Commission on Non-Ionizing Radiation Protection ‘Guidelines for limiting exposure to time-varying electric and magnetic fields (1 Hz to 100 kHz)’ (Health Physics 99(6): 818–836; 2010) (ICNIRP Guidelines) or their revisions, or any other applicable New Zealand standards.</i></p>	<p>This amends policy 9 of the NPS-ET, which references outdated 1998 ICNIRP Guidelines and is inconsistent with NES-ETA. The 2010 ICNIRP Guidelines are the most current international recommendations for managing electric and magnetic fields.</p> <p>The ICNIRP establishes limits for public exposures to electric and magnetic fields based on the health science. The World Health Organization recommendations are to take low-cost measures to limit exposures to electric and magnetic fields when constructing new facilities or making changes to existing sources of the fields. This approach is also supported by the Ministry of Health and Health New Zealand.</p>

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