

# Application for a project to be referred to an expert consenting panel

(Pursuant to Section 20 of the COVID-19 Recovery (Fast-track Consenting) Act 2020)

For office use only:

Application number: .....

Date received: .....

This form must be used by applicants making a request to the responsible Minister(s) for a project to be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

All legislative references relate to the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act), unless stated otherwise.

The information requirements for making an application are described in Section 20(3) of the Act. Your application must be made in the approved form and contain all of the required information. If these requirements are not met, the Minister(s) may decline your application due to insufficient information.

Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail, sufficient to inform the Minister's decision on the application, as opposed to the level of detail provided to an expert consenting panel deciding applications for resource consents or notices of requirement for designations.

We recommend you discuss your application and the information requirements with the Ministry for the Environment (the Ministry) before the request is lodged. Please contact the Ministry:

Email: [fasttrackconsenting@mfe.govt.nz](mailto:fasttrackconsenting@mfe.govt.nz)

The Ministry has also prepared [Fast-track consenting guidance](#) to help applicants prepare applications for projects to be referred.

Applications must be submitted to the Minister via email: [fasttrackconsenting@mfe.govt.nz](mailto:fasttrackconsenting@mfe.govt.nz)

To complete this form, please scroll down and click in the appropriate field.

## Part I: Applicant

### Applicant details

Person or entity making the request: Transpower New Zealand Limited

Contact person: Joanne Mooar

Job title: Senior Corporate Counsel

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal address: 22 Boulcott Street, PO Box 1021, Wellington

### Address for service (if different from above)

Organisation: Click here to enter text.

Contact person: Click here to enter text.

Job title: Click here to enter text.

Phone: Click here to enter text.

Email: Click here to enter text.

Email address for service: Click here to enter text.

Postal address: Click here to enter text.

## Part II: Project location

The application (click to place an "X" in the relevant box):

- ☒ does not relate to the coastal marine area
- ☐ relates partly to the coastal marine area
- ☐ relates wholly to the coastal marine area.

If the application relates to the coastal marine area wholly or in part, references to the Minister in this form should be read as the Minister for the Environment and Minister of Conservation.

Site address / location:

Please see attached map showing the approximate geographical location of the Project Works and the Workers' Village.

A cadastral map and/or aerial imagery to clearly show the project location will help.

Legal description(s):

Please see attached map.

A current copy of the relevant Record(s) of Title will help.

Registered legal land owner(s):

Please see attached map.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work that is required for the project:

**Project Works:** In relation to works on transmission lines, Transpower has rights to work on its lines through the Electricity Act (eg the process for giving landowner's notice of entry) and/or as through existing property rights. Transpower may exceed its statutory rights in approximately 10 locations, and is working through the process of obtaining those rights.

Transpower has sufficient interest in the land the substations are located on to enable it to carry out the work.

**Workers' Village:** Transpower is in the process of obtaining the legal interest in land necessary for the establishment and operation of the Workers' Village.

## Part III: Project details

### Description

Project name: Clutha Upper Waitaki Lines Project (CUWLP) – Project Works and Workers' Village

Project description:

Please provide details of the proposed project, its purpose, objectives and the activities it involves, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

The purpose of the Clutha Upper Waitaki Lines Project (CUWLP) is to increase the transmission capacity for transport of electricity between the Otago-Southland region and the Waitaki Valley.

This project will contribute to several objectives. The additional capacity to transport electricity northward from the Otago-Southland region will be important once the Tiwai Point aluminium smelter ceases or reduces its operations, resulting in significant excess capacity at the Manapouri generation scheme. The additional capacity for southward flow of electricity will also increase resilience for times when there is low generation in the Otago-Southland region.

The transmission grid connects the Otago-Southland region and the Waitaki Valley with a loop from Roxburgh, north through Naseby, Livingstone, the Waitaki (including dams at Aviemore, Benmore, Ohau B and C), to Twizel, and then south through Cromwell and Clyde to Roxburgh.

CUWLP involves strengthening/upgrading parts of that transmission loop. Specifically, CUWLP involves:

- Duplexing the Roxburgh – Naseby – Livingstone circuits. This is the most significant part of the project in terms of scale and in effect doubles the circuits, increasing capacity;
- Thermally upgrading the Cromwell – Twizel circuits;
- Duplexing the Aviemore – Benmore circuits. This work may be avoided if Transpower can use a lower cost solution (called a Special Protection Scheme). We will be able to assess this choice once we have completed the work on the two sections identified above. However because we currently need the option of duplexing these circuits, this work is included in the application.

The kinds of activities involved in strengthening these circuits include:

- Building access tracks, vegetation trimming/removal and mid-span earthworks;
- Strengthening the foundations of towers with additional concrete;
- Raising and strengthening towers with additional steel;
- Replacement structures;
- Installing additional wires (ie conductoring);
- relocating lower voltage lines underground;
- Upgrading transformers and other works at the 3 existing substations.

Note – the attached memorandum (Kate Mandis, 14 January 2020) describes some of the work at a high level. In particular, it describes both duplexing and thermal upgrading. The memorandum also describes the other lines work involved.

Transpower has an established project page on its website, which describes the project in further detail - <https://www.transpower.co.nz/clutha-upper-waitaki-lines-project>

An important part of the project from a consenting and regional economic benefit point of view will be the establishment of a village to house workers for the duration of the work on the Roxburgh – Naseby – Livingstone circuits. This will need to accommodate approximately 100 people.

Where applicable, describe the staging of the project, including the nature and timing of the staging:

The CUWLP has progressed in stages to get to this point. In 2010 the Electricity Commission approved the strengthening/upgrading of five sections of the transmission loop between Roxburgh and Twizel.

Two of these sections were strengthened/upgraded some time ago. The remaining two sections approved by the Electricity Commission are the subject of this application and are described above. A third section is also referred to below.

Last year, with the financial support of Meridian Energy and Contact Energy, Transpower got underway with the enabling works necessary to be ready to do some of the work required on the Roxburgh – Naseby – Livingstone circuits and the Cromwell – Twizel circuits. These enabling activities have included design updating, landowner liaison and some environmental work, foundation strengthening works, dealing with undercrossing low voltage lines, and purchasing long lead-time materials such as conductor core.

An additional aspect of staging is noted above: the duplexing of the Aviemore – Benmore circuits may be avoided if we can use a lower cost solution (called a Special Protection Scheme). We will be able to assess this choice once we have completed the work on the first two sections identified above. However, because we currently need the option of duplexing these circuits, this work on the Aviemore – Benmore circuits is included in the application. Any consents for this part of the project would be lodged separately.

### Consents / approvals required

**Relevant local authorities:** Central Otago District Council, Waitaki District Council, Otago Regional Council, Canterbury Regional Council

**Resource consent(s) / Designation required (click to place an "X" in the relevant box/s):**

- |  |   |   |
|--|---|---|
| <input checked="" type="checkbox"/> Land-use consent | <input checked="" type="checkbox"/> Subdivision consent | <input type="checkbox"/> Coastal permit |
| <input type="checkbox"/> Water permit                | <input checked="" type="checkbox"/> Discharge permit    | <input type="checkbox"/> Designation    |
| <input type="checkbox"/> Alteration to designation   |   |   |

**Rule(s) consent is required under and activity status:**

Please provide details of all rules consent is required under. Please note that Section 18(3)(a) of the Act details that the project **must not include** an activity that is described as a prohibited activity in the Resource Management Act 1991, regulations made under that Act (including a national environmental standard), or a plan or proposed plan.

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
National Environmental Standards for Electricity Transmission Activities	Regulation 14, 30 and 33 and any others necessary	Replacement of transmission line support structures, earthworks and	Restricted Discretionary	See map of Project Works

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
		vegetation removal in natural areas		
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	Regulation 9, 10 and 11 and any others necessary	Section 9 RMA consent, including disturbance of soil on a HAIL site	Discretionary	Roxburgh, Naseby and Livingstone Substations
Otago Regional Plan: Waste	5.6.1 and any others necessary	Section 9 RMA consents, including disturbance of a contaminated site	Discretionary	See map of Project Works
Otago Regional Plan: Water	13.1 & 13.2 and any others necessary	Section 13 RMA consents, including works on a bridge or culvert	Discretionary	See map of Project Works
Canterbury Land and Water Regional Plan	5.137, 5.175 and any others necessary	Section 9 and 13 RMA consents, including works on a bridge or culvert and earthworks over an aquifer.	Restricted Discretionary.	See map of Project Works
Central Otago District Plan	4.7.3 and any others necessary	Section 9 RMA consents, including accommodation facilities in the Rural zone.	Discretionary	See map of Workers' Village
Otago Regional Plan: Water	12.1 and 12.A and any others necessary	Section 14 and 15 RMA consents, including abstraction of groundwater and discharge of wastewater.	Non-complying (water take) / Discretionary (discharge)	See map of Workers' Village

At this stage, we do not anticipate triggering consents for the Project Works under the Waitaki District Plan.

There are no prohibited activities.

Outline Plans of Work may be required in relation to the existing substation designations, however these will proceed through the normal process.

Note – the NESETA consents triggered by this project are not “end to end.” The thermal upgrade and the duplexing are permitted *per se*. Consents are triggered at some sites only, and in the Danseys Pass area in particular.

Resource consent applications already made, or notices of requirement already lodged, on the same or a similar project:

Please provide details of the applications and notices, and any decisions made on them. Schedule 6 clause 28(3) of the Act details that a person who has lodged an application for a resource consent or a notice of requirement under the Resource Management Act 1991 in relation to a listed project or a referred project, must withdraw that application or notice of requirement before lodging a consent application or notice of requirement with an expert consenting panel under this Act for the same, or substantially the same, activity.

None.

Resource consent(s) / Designation required for the project by someone other than the applicant, including details on whether these have been obtained:

**Project Works:** Electricity distribution companies may need to seek resource consent(s) under the Resource Management Act 1991 for undercrossings (ie distribution lines which cross under Transpower lines – thermal upgrades and duplexing of the transmission lines will result in lower sag of the wires, which would result in the distribution lines and transmission lines being too close together).

**Workers' Village:** None required.

Other legal authorisations (other than contractual) required to begin the project (eg, authorities under the Heritage New Zealand Pouhere Taonga Act 2014 or concessions under the Conservation Act 1987), including details on whether these have been obtained:

The following legal authorisations will also be required for the project:

Project Works:

- Archaeological authorities will be required for some of the works in the vicinity of Naseby, Danseys Pass/Kyeburn and Livingstone.
- Wildlife permits may be required for some of the works if they have potential to disturb terrestrial wildlife.
- Road corridor access rights may be required.
- Conservation Act concession for one replacement structure (potentially required).
- Reserves Act approval (potentially required if works occur on one site).

Workers' Village:

- Road corridor access rights may be required.

### Construction readiness

If the resource consent(s) are granted, and/or notice of requirement is confirmed, when do you anticipate construction activities will begin, and be completed?

Please provide a high level timeline outlining key milestones, eg, detailed design, procurement, funding, site works commencement and completion.

Design work and environmental assessments (archaeology, visual/landscape, ecology and planning) to be progressively completed from August 2020.

Procurement is underway, and will be progressively delivered in time for works.

Enabling works, including access tracks, earthworks, foundations for replacement towers, tower installation and tower strengthening activities, will commence October 2020.

Stringing work to commence January 2021.

Workers' Village construction will commence with a view to the Village being in place by mid-December 2020 and ready for occupation January 2021. Removal/reinstatement activities will occur once the Project Works are complete.



Funding approvals have been obtained.

## Part IV: Consultation

### Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

Ministry for the Environment – high level discussions in the context of the economic recovery and the country's broader climate change commitments

Ministry of Business Innovation and Employment –discussions in the context of the economic recovery and broader electricity industry discussions

Infrastructure Commission / Infrastructure Reference Group –discussions as part of the economic recovery

Heritage New Zealand Pouhere Taonga – discussions commencing

Department of Conservation - discussions commencing

### Local authorities

Detail all consultation undertaken with relevant local authorities:

Central Otago District Council – high level discussions

Waitaki District Council – information provided

Otago Regional Council – discussions commencing

Canterbury Regional Council – discussions commencing

### Other persons/parties

Detail all other persons or parties you consider are likely to be affected by the project:

**Project Works:** Transpower has a dedicated team that works with landowners to obtain access to land under the Electricity Act, and will continue to work with those landowners affected by this project. Other potentially affected parties include distribution companies (as mentioned above) and electricity market participants.

**Workers' Accommodation:** Owners and occupiers of land within the area identified on the Map. Service providers (eg water, wastewater, electricity).

Detail all consultation undertaken with the above persons or parties:

During 2013, Transpower undertook consultation as part of its review of the project components that had been placed on hold. In mid-2020, Transpower undertook consultation on whether current market conditions supported Transpower proceeding with completing the CUWLP project. Both consultation processes were open to the public, with submissions received. This consultation is detailed on Transpower's website -

<https://www.transpower.co.nz/clutha-upper-waitaki-lines-project-consultation-2020> In addition, discussions have been held with relevant local authorities, Central Government entities and landowners (as detailed above).

Discussions with landowners have occurred over many years. Discussions are about to recommence as the works get underway, as noted above. Sample letters/information can be provided.

## Part V: Iwi authorities and Treaty settlements

For help with identifying relevant iwi authorities, you may wish to refer to Te Kāhui Māngai – Directory of Iwi and Māori Organisations.

### Iwi authorities and Treaty settlement entities

Detail all consultation undertaken with iwi authorities whose area of interest includes the area in which the project will occur:

Transpower has a network of some 12,000 km of transmission line throughout the country. We endeavour to build relationships with the mana whenua of the land over which those transmission lines pass. While introductions are often through iwi, Transpower focuses its efforts on building relationships with the hapū. With Ngai Tahu and this Project, our work has involved discussions at the runanga level.

Iwi authority	Consultation undertaken
Ngāi Tahu	Consultation is underway as follows: In Canterbury, Te Rūnanga o Arowhenua have been contacted (through Aoraki Environmental Ltd consultancy). In Otago, Te Rūnanga o Waihao, Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Otākou, and Hokonui Rūnanga have been contacted (through Aukaha Ltd) In Southland, we intend to engage with the relevant groups from Awarua Rūnanga, Hokonui Rūnanga, Oraka/Aparima Rūnaka, and Waihopai Rūnanga (through Te Ao Marama Inc)

Detail all consultation undertaken with Treaty settlement entities whose area of interest includes the area in which the project will occur:

Treaty settlement entity	Consultation undertaken

### Treaty settlements

Treaty settlements that apply to the geographical location of the project, and a summary of the relevant principles and provisions in those settlements, including any statutory acknowledgement areas:

Section 18(3)(b) of the Act details that the project **must not include** an activity that will occur on land returned under a Treaty settlement where that activity has not been agreed to in writing by the relevant land owner.

Transpower is not currently aware of any Treaty settlement land that would be affected by the project works.



## Part VI: Marine and Coastal Area (Takutai Moana) Act 2011

### Customary marine title areas

Customary marine title areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(c) of the Act details that the project **must not include** an activity that will occur in a customary marine title area where that activity has not been agreed to in writing by the holder of the relevant customary marine title order.

Not applicable.

### Protected customary rights areas

Protected customary rights areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(d) of the Act details that the project **must not include** an activity that will occur in a protected customary rights area and have a more than minor adverse effect on the exercise of the protected customary right, where that activity has not been agreed to in writing by the holder of the relevant protected customary rights recognition order.

Not applicable.

## Part VII: Adverse effects

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions:

In considering whether a project will help to achieve the purpose of the Act, the Minister may have regard to, under Section 19(e) of the Act, whether there is potential for the project to have significant adverse environmental effects. Please provide details on both the nature and scale of the anticipated and known adverse effects, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

Due to the need to accelerate the construction of the Project Works and Workers' Village full assessments of effects have not yet been undertaken. Transpower has engaged relevant technical experts to assess the effects of the Project and advise it on appropriate mitigation requirements. This section provides a general description of the anticipated and known effects of the project on the environment. Further information can be provided about the sites where work will be required on structures, if that detail is useful.

### Project works:

The Project Works that require consents under the NESETA are relatively standard and non-contentious. We would not expect them to be limited or publicly notified if the applications were processed under the RMA.

The **attached** memorandum (Kate Mandis 14 January) describes works in more detail.

**Earthworks:** Earthworks will be managed in accordance with best practice to ensure that any erosion and sediment impacts are adequately mitigated.

**Landscape/visual:** the Project area includes some Outstanding Natural Landscapes (ONLs) and will be visible to some residential property owners. The Project Works involve works on existing transmission lines within those ONLs, and the structures will continue to have the same or similar impacts on those landscapes. Earthworks and vegetation

removal have the potential to modify the landscape, but works will be managed, and reinstatement and replanting will be undertaken, to ensure effects are appropriately mitigated and remedied.

**Contamination:** the potential for human health impacts will be managed through the development and implementation of a Site Management Plan, using standard good practice site management procedures.

**Archaeology/heritage:** the earthworks have the potential to adversely affect archaeological sites within the Project area. As discussed above, Transpower will obtain archaeological authorities and undertake the works in accordance with the authorities. The Project will not impact any known built heritage sites.

**Vegetation removal:** the Project area includes some Significant Natural Areas (ie. SEAs as identified in the district plan). Transpower would only be trimming or removing vegetation due to access track construction/upgrade or to ensure compliance with the Electricity (Hazards from Trees) Regulations. As a result, Transpower has engaged an ecologist to assess the impacts and provide advice as to how to remedy or mitigate the impacts on any flora or fauna in the area. We also note that Transpower's Sustainability Strategy contains a commitment that "Using a Kaitiaki approach, we restore the environment, creating a net gain in biodiversity." This commitment would apply to the Project Works. **Works in watercourses (bridges/culverts)** - these are routine works that (if required) can be appropriately managed in accordance with good practice standards.

#### Workers' Village:

Construction effects (eg traffic, erosion and sediment control, noise) associated with the Workers Village will be managed using standard good practice management procedures. Effects associated with the use of the Workers' Village will be temporary, during the Project Works period. Following the completion of the Project Works, the Workers' Village site will be remediated and the accommodation units repurposed. There is a potential for social impacts to arise from a large influx of workers into a small community. Social impacts will be managed using good practice social impact management procedure. Transpower is also talking to other providers of workers villages, and learning from them in relation to set up and operation of the Village.

## Part VIII: National policy statements and national environmental standards

General assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard:

#### **National Policy Statement on Electricity Transmission 2008 (NPSET)**

The NPSET confirms the national significance of the National Grid. The NPSET objective is to:

*recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:*

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.*

The NPSET policies require decision-makers to recognise and provide for the national, regional and local benefits of electricity transmission, recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network, manage the environmental effects of the electricity transmission network, and manage the adverse effects of third party activities on the transmission network.

The Project is consistent with the NPSET. It will promote a number of the benefits listed in the NPSET, including improved security of supply of electricity, efficient transfer of energy through a reduction in transmission losses, and enhanced supply of electricity through removal of points of congestion.

#### **National Policy Statement for Renewable Electricity Generation 2011 (NPSREG)**

The NPSREG confirms the national significance of renewable electricity generation. The Objective of the NPSFM is to:

*recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation.*

The Project is consistent with the NPSREG as the additional transmission capacity will provide for the efficient transportation of existing renewable electricity generation from the region.

#### **National Policy Statement for Freshwater Management 2014 (NPSFM)**

The NPSFM addresses the health and well-being of freshwater bodies. In relation to water quality, Objective A2 is to maintain or improve the overall quality of fresh water within a freshwater management unit. The Project Works and Workers' Village do not require any water take permits. Discharge permits are required as noted in Part III.

#### **National Policy Statement on Urban Development Capacity 2016 (NPSUDC) / National Policy Statement on Urban Development 2020 (NPSUD)**

The NPSUDC / NPSUD address urban environments. Objective 1 of the NPSUD, for example, is "well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future".

The Project Works and Workers' Village will be located in generally rural environments, so the NPSUDC and NPSUD have limited relevance. However, the establishment of a Workers' Village will ensure the influx of people necessary for the Project Works will reduce any adverse effects on the functioning of nearby towns and villages.

#### **Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA)**

The NESETA provides a nationally consistent rule framework for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010. It does not apply to new transmission lines or substations.

The NESETA specifies that activities that relate to the operation, maintenance, upgrading, removal or relocation of existing transmission lines are permitted, subject to terms and conditions. It also specifies the resource consent requirements that apply to transmission activities that do not meet the permitted activity terms and conditions. The NESETA does not include objectives and policies.

As set out in Part III, the Project Works require consents under the NESETA.

#### **Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil)**

The NES Soil provides a nationally consistent rule framework for the development of land affected by contaminants in soil. The NES Soil manages the human health effects of contaminants in soil, and regional rules relating to discharges of contaminants may also apply. As set out in Part III, the Project Works relating to substations require consents under the NES Soil.

## **Part IX: Purpose of the Act**

Your application must be supported by an explanation of how the project will help to achieve the purpose of the Act, being to "urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources".

In considering whether the project will help to achieve the purpose of the Act, the Minister may have regard to the specific matters referred to below, and any other matter that the Minister considers relevant.

The purpose of the Act is to “urgently promote employment to support New Zealand’s recovery from the economic and social impacts of COVID-19 and to support the certainty of on-going investment across New Zealand, while continuing to promote sustainable management of natural and physical resources”. The CUWLP aligns well with this purpose, having both an immediate regional economic benefit and a longer term national economic and environmental benefit.

### ***Regional economic stimulus***

CUWLP will provide an immediate regional economic stimulus. The project will involve a significant local workforce, and also require significant local support for the workers village.

#### ***Workforce***

The workforce will include local labourers and contractors, as well as experts provided by our field service providers who operate nationally. Equipment and supplies will also need to be sourced locally. We are talking to our existing and new providers of materials – in order to ensure all necessary procurement to meet our proposed timeline.

To give a sense of scale we are planning to construct a Workers’ Village that will home up to 100 workers at any one time, which will itself need to be built by local builders and contractors.

#### ***Workers’ Village***

The Workers Village will also need to be supported throughout the life of the project. We are committed to using a range of local suppliers for services such as food, cleaning, and security. This will provide a range of local businesses with some certainty during the COVID recovery phase.

### ***National benefits***

The national benefits of CUWLP are:

- Reducing the risk that there is excess low cost renewable electricity in the Otago-Southland region that cannot be transported north. If this happens, water would potentially need to be spilled across New Zealand’s hydro schemes, in particular at Manapouri, Clyde and Roxburgh while higher cost electricity supplied the wholesale electricity market to meet demand. Transpower’s consultation paper on the project discussed relevant costs per annum - the dispatch benefit of CUWLP with electricity use at Tiwai reduced to OMW is \$100M per annum. Bringing forward completion of CUWLP from its current date of May 2023 to (for example) May 2022 would benefit New Zealand to the extent of \$100M, as it would enable those dispatch benefits to be realised earlier.
- Facilitating further renewable energy developments in the Otago-Southland region, which would assist with New Zealand’s goal of increased electrification as part of the transition to a low-emissions economy;
- Potentially lower electricity prices for consumers, compared to the situation where the grid remains constrained.
- Substantial efficiencies in reducing the need for new energy projects as electricity demand grows (by optimising use of the existing hydro schemes).

Note – the attached briefing note (Raewyn Moss and Jo Mooar, 27 May 2020) describes some of the benefits at a high level. The memorandum also describes the regulatory requirements applying at a high level.

We address the specific matters identified in the application form, below.

Project’s economic benefits and costs for people or industries affected by COVID-19:

See *Regional economic stimulus* benefits above.

Project’s effects on the social and cultural wellbeing of current and future generations:

See *Regional economic stimulus* benefits above. In particular, the Project will provide employment opportunities in a region particularly impacted by the down-turn in tourism caused by Covid-19.

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case:

The processes in the Act will allow CUWLP to progress faster than would otherwise be the case. As detailed earlier, the Project would ordinarily involve obtaining a number of approvals under a number of national environmental standards, regional plans and district plans. There are 4 local authorities from whom consents would need to be obtained, adding complexity and inefficiencies, which could increase the risk of delays. By using the processes in this Act, we anticipate we can be ready to start work as early as October. Using standard RMA processes, the project could take in the order of 14-20 months.

Whether the project may result in a 'public benefit':

Examples of a public benefit as included in Section 19(d) of the Act are included below as prompts only.

See *Regional economic stimulus* benefits and *National benefits*, above.

Employment/job creation:

See *Regional economic stimulus* benefits, above.

Housing supply:

At the completion of CUWLP, Transpower will disestablish the Workers' Village and distribute and/or sell the accommodation units locally if possible. We are factoring that stage into our planning now, so that the accommodation we construct for the Workers' Village will be useful for other purposes at the completion of the project.

Contributing to well-functioning urban environments:

N/A.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity:

CUWLP is a part of our investment in New Zealand's transmission infrastructure. The National Grid will play an important role in the electrification of the New Zealand economy, which is crucial to New Zealand's transition to a low carbon economy and meeting our climate change targets.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity:

N/A.

Minimising waste:

As discussed above in relation to National benefits, the CUWLP project will reduce the risk of water being spilled from New Zealand's hydro schemes in particular at Manapouri, Clyde and Roxburgh, and wasting the potential for low cost renewable electricity.

Contributing to New Zealand's efforts to mitigate climate change and transition more quickly to a lower emissions economy (in terms of reducing New Zealand's net emissions of greenhouse gases):

CUWLP is a part of our investment in New Zealand's transmission infrastructure. The National Grid will play an important role in the electrification of the New Zealand economy, which is crucial to New Zealand's transition to a low carbon economy and meeting our climate change targets.

Promoting the protection of historic heritage:

N/A.



Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change:

CUWLP will improve the capacity of electricity to flow both north and south between Otago-Southland and the Waitaki. This will improve the resilience of the power system in those regions and nationally, which will be of benefit as climate conditions become more volatile and harder to predict.

Other public benefit:

N/A.

Whether there is potential for the project to have significant adverse environmental effects:

The adverse effects of the Project are addressed at Part VI above. Construction effects will be appropriately mitigated. Operational effects will be minor, or positive. In particular, once completed, CUWLP will contribute toward improved environmental outcomes in New Zealand, as described above. As noted, we do not envisage that CUWLP will have significant adverse environmental effects.

## Part X: Climate change and natural hazards

Description of whether and how the project would be affected by climate change and natural hazards:

Transpower is a lifeline utility under the Civil Defence and Emergency Management Act 2002. Accordingly, in an emergency event, Transpower is required to continue functioning, to the greatest extent possible, both during and after the event. Transpower designs all components of the National Grid to withstand all emergency events in accordance with international best practice, high design specifications and Transpower's civil defence responsibilities. All components of the National Grid are designed and constructed to withstand all natural hazard events including a 1:2500 year earthquake event as well as flooding and significant snow and storm events that are likely to occur during the design working life of the asset component (minimum 50 years). Durability and resilience are critical criteria.

We are not aware of any natural hazards overlays in the relevant District or Regional Plans, that apply to the Project Works.

## Part XI: Track record

A summary of all compliance and/or enforcement actions taken against the applicant by a local authority under the Resource Management Act 1991, and the outcome of those actions:

Local authority	Compliance/enforcement action and outcome
Auckland Council	July 2011: Abatement and Infringement Notice – for works in the bed of a waterbody (removal of a culvert) without appropriate erosion and sediment controls and works methodology. No further enforcement action taken.
Waikato Regional Council	December 2013: Infringement Notice for use of land (earthworks) contravening a regional rule. No further enforcement action taken.
	No other compliance/enforcement actions within the last 10 years are known.

## Part XII: Declaration

By typing your name in the space provided, you are electronically signing this application form and certifying the information given in this application is true and correct.



Click here to enter text.

Click right-hand down arrow to enter a date.

**Signature of person or entity making the request**

**Date**

## Important notes:

- Please ensure all sections, where relevant, of the application form are completed as failure to provide the required details may result in your application being declined.
- Further information may be requested at any time before a decision is made on the application.
- Information presented to the Minister for the Environment and/or Minister of Conservation (and the respective agencies) is subject to disclosure under the Official Information Act 1982 (OIA). Certain information may be withheld in accordance with the grounds for withholding information under the OIA. Further information on the OIA is available at [www.ombudsmen.parliament.nz](http://www.ombudsmen.parliament.nz).

Information held by the Minister(s) and the agencies may have to be released under the OIA in response to a request from a member of the public (or any other body) for that information unless there are grounds for withholding that information. The grounds for withholding must always be balanced against considerations of public interest that may justify release. Although the Ministry for the Environment does not give any guarantees as to whether information can be withheld under the OIA, it may be helpful to discuss OIA issues with the Ministry for the Environment in advance if information provided with an application is commercially sensitive or release would, for instance, disclose a trade secret or other confidential information.

## Checklist

Where relevant to your application, please provide a copy of the following information (click to place an "X" in each box to confirm):

- ☐ Correspondence from the registered legal land owner(s)
- ☐ Correspondence from persons or parties you consider are likely to be affected by the project
- ☐ Written agreement from the relevant landowner where the project includes an activity that will occur on land returned under a Treaty settlement.
- ☐ Written agreement from the holder of the relevant customary marine title order where the project includes an activity that will occur in a customary marine title area.
- ☐ Written agreement from the holder of the relevant protected customary marine rights recognition order where the project includes an activity that will occur in a protected customary rights area.