



Te Rūnanga o NGĀI TAHU

19 August 2020

Hon David Parker  
Minister for the Environment  
Private Bag 18888  
Parliament Buildings  
**WELLINGTON 6160**  
Email: [REDACTED] s 9(2)(a)

E te Minita, tēnā koe

**COVID-19 RECOVERY (FAST-TRACK CONSENTING) ACT 2020 — CLUTHA UPPER WAITAKI LINES PROJECT (CUWLP) PROJECT WORKS AND WORKERS' VILLAGE [YOUR REFERENCE 2020-B-07082]**

Thank you for your letter dated 7 August 2020 that seeks comments on the upgrading of 220kV electricity transmission lines and the construction of use of land for a temporary workers' village being considered for fast-tracking under the COVID-19 Recovery (Fast Track Consenting) Act 2020 (**the Act**).

Te Rūnanga o Ngāi Tahu (Te Rūnanga) recognises the importance of engaging in projects that currently promote employment and investment. Te Rūnanga further recognises that there is merit in using alternative process to that offered under the Resource Management Act for this project.

I understand that affected Papatipu Rūnanga are currently engaging with Transpower to better understand the proposed project and how it will affect them. Papatipu Rūnanga in the Otago region have met with Transpower and expressed they are uncertain which components of the proposal are being fast-tracked. They understand from Transpower that only the village would be fast-tracked and that a location for the village had not yet been secured. This information differs considerably from that contained in your letter of 7 August. This raises concern about the extent of the proposal and how it will affect Papatipu Rūnanga, particularly if it is fast-tracked. Further clarity on this matter would be appreciated to enable well-informed feedback on the process.

However, I do note that Te Rūnanga supports that if the proposed project is referred to a panel that Ngāi Tahu will have the opportunity to nominate a representative to the panel and therefore a role in determining the application.

Te Rūnanga o Ngāi Tahu  
15 Show Place, Addington, Christchurch 8024  
PO Box 13-046, Christchurch, New Zealand  
Phone + 64 3 366 4344, 0800 KAI TAHU  
Email: [info@ngaitahu.iwi.nz](mailto:info@ngaitahu.iwi.nz)  
Website: [www.ngaitahu.iwi.nz](http://www.ngaitahu.iwi.nz)

It is also noted that a component of the proposed project is an upgrade of the network, so that the additional capacity obtained from the ceasing or reduction of the Tiwai Point aluminium smelter can be fed into the national grid. Ngāi Tahu has, for generations, been concerned about the impacts of the takes by the Manapouri hydro-electric generation scheme on water levels within the Waiau River, which is a Statutory Acknowledgement under the Ngāi Tahu Claims Settlement Act 1998. I seek your assurances that the project will not pre-empt or pre-determine any discussions with Ngāi Tahu on increasing flow levels into the Waiau River from the Manapouri Hydro-electric scheme following the cessation or reduction of electricity use by the Tiwai Smelter.

I look forward to engaging with you further on this matter.

Mō tātou

Arihia Bennett, MNZM  
**Chief Executive Officer**

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the Official Information Act 1982

## Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for local authorities to provide comments to the Minister for the Environment on the decision to refer projects to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

<b>Local authority providing comment</b>	Central Otago District Council
<b>Contact person</b> (if follow-up is required)	David Campbell
	Planning Manager
	s 9(2)(a)

### Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Clutha Upper Waitaki Lines Project
<b>General comment</b>	<p>The Central Otago District Council is acutely aware of the electricity transmission constraints and potential opportunity the impending closure of Tiwai Point Aluminium Smelter creates for unused electricity to be redistributed.</p> <p>The Central Otago district is traversed by two main lines, significant lengths of which pass through iconic landscapes. While these landscapes may be compromised to some degree by the existing transmission network, further degradation of these landscapes is discouraged.</p>
<b>Is Fast-track appropriate?</b>	<p>It would not be appropriate for the project to go through the Fast-Track process. The project has two distinct parts:- 1. The transmission upgrade, which can largely be consented under the NES for Electricity Transmission Activities and NES for Assessing and Managing Contaminants in Soil to Protect Human Health; and, 2. The Workers' Village can be consented under the Central Otago District Plan, with an easier consenting path likely where it is located in an appropriate urban location.</p>
<b>Environmental compliance history</b>	None that we are aware of.

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Insert responses to other specific requests in the Minister's letter (if applicable)

1. Any local environmental or resource management issues that may affect, or be affected by this project.

Workers' Village:

A map attached to the application shows the approximate geographical location of the CUWLP Workers' Village as being somewhere within an area of approximately 500 km<sup>2</sup> – 600 km<sup>2</sup> that includes much of the Maniototo Plain and environs. The existing towns and settlements of Ranfurly, Naseby, Patearoa and Waipiata appear to be located within this large area.

*Given the lack of specificity with respect to the nominated location of a Workers' Village it is not possible to comment on the environmental or resource management issues that relate to any particular site or sites at this time.*

The application discloses that the Workers' Village is to house workers for the duration of the work on the Roxburgh-Naseby-Livingstone circuit; and that the Workers' Village will need to accommodate approximately 100 people. The Council is strongly of the view that the Workers' Village should be located within or immediately adjacent to an existing town or settlement rather than being located in a more remote location.

The location of the Workers' Village within or adjacent to an existing town or settlement will:

1. Facilitate the provision of transport and utility services (such as roading, water, wastewater disposal and electricity).
2. Facilitate social integration with an existing community.
3. Provide convenient access to commercial and community facilities and services for workers.
4. Avoid landscape and visual effects that may otherwise arise from locating a Workers' Village in a rural location.

The application advises that following the completion of the CUWLP works that the Workers' Village site will be remediated and the accommodation units repurposed.

The Central Otago District has an ongoing need for seasonal workers accommodation to accommodate workers engaged in the horticulture and viticulture industries. Given the applicants' intent to repurpose the accommodation units the Council promotes that consideration be given to locating the Workers' Village from the outset closer to another part of the district where seasonal workers accommodation is required. On this basis a better location for the Workers' Village may well be, say, in the Alexandra-Clyde basin or in a nearby community such as Omakau. If the village cannot be located closer to Alexandra, then an option to relocate these into the Alexandra-Clyde basin be indicated as a first option for Council to consider and potentially offer (in conjunction with Transpower) to the market through an open tender process.

It is anticipated that conditions of consent with respect to the Workers' Village component of the CUWLP will address the following matters:

1. Visual effects (colour of buildings and landscape treatment).
2. The safe and efficient operation of the roading network.

3. Provision of adequate parking and manoeuvring on site.
4. Provision for utility services such as water, wastewater disposal and electricity.
5. Management regime for the operation of the Workers' Village (to ensure that any adverse effects (e.g. noise on neighbours) are mitigated).
6. Provision for site remediation within a defined period (if accommodation units are not to be retained on the site for an alternate purpose such as seasonal workers accommodation).
7. A limited term consent consistent with the anticipated time frame for the CUWLP.

*It is acknowledged again that the above comments are expressed in general terms given the lack of specificity with respect to the location of the proposed Workers' Village.*

#### Duplexing the Roxburgh-Naseby-Livingstone Circuits:

It is acknowledged that this aspect of the CUWLP involves work on existing infrastructure, being part of the ROX-ISL-A transmission line. It is also acknowledged that much of this work is a permitted activity in terms of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA).

Given that the transmission lines exist, the addition of conductors (wires) on the transmission line will, per se, have little effect on the environment, other than make the lines a more obvious visual feature.

Potential adverse effects on the environment are associated with the establishment of pulling/tensioning sites [wiring sites] 4km-6km apart, foundation strengthening to support the additional load and, in some instances, tower replacement. The Roxburgh-Naseby-Livingstone transmission line generally passes through rural areas, an exception being that portion of the line that passes through the Pines area in the northern part of Alexandra.

The existing ROX-ISL-A transmission line passes through an Outstanding Natural Landscape in the Danseys Pass area as shown on Map 67 of the Operative Central Otago District Plan. It is anticipated that the potential adverse effects of earthworks associated with duplexing will be given particular consideration in this environment. Elsewhere the transmission line passes through Significant Amenity Landscapes and Other Rural Landscapes as identified in the tripartite landscape classification contained in the District Plan.

It is anticipated that conditions of consent will address the following matters:

The landscape and visual amenity effects of the seven new towers as required as part of the duplexing project.

1. Any landscape and visual amenity effects associated with wiring sites, foundation strengthening and access track upgrading.
2. Hours of operation within the town of Alexandra and in any other locations where the duplexing works are to occur in close proximity to existing dwellings.
3. Mitigation of any adverse effects on flora or fauna.

4. Reinstatement of all land disturbed by earthworks including wiring sites, foundation strengthening and the edges of access tracks.

It is understood that an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 will be obtained prior to undertaking any works that have the potential to adversely affect archaeological sites. The application documentation advises that such archaeological authorities are likely to be required, in particular, in the Danseys Pass area.

Thermally Upgrading the Cromwell-Twizel Circuits:

Again it is acknowledged that this aspect of the CUPLP relates to existing infrastructure; and that some activities are permitted in terms of the NESETA.

Thermal upgrading is proposed on the ROX-TWZ-A transmission line. This transmission line passes through rural areas within the district between Cromwell and the district boundary, to the east of Lindis Pass. Thermally upgrading the transmission line has no particular effect on the environment per se; but adverse effects on the environment may result from works to address the resulting conductor sag and need to achieve compliance with the New Zealand Electrical Code of Practice 34 (NZECP 34).

Landscape and visual effects are likely to be associated with mid-span earthworks that are necessary to achieve compliance with the minimum separation requirements of NZECP 34. Alternative rectification works such as increasing the height of towers through a body extension or a full tower replacement, or adding a tower mid-span, are also likely to have landscape and visual amenity effects.

A portion of the ROX-TWZ-A transmission line passes through an Outstanding Natural Landscape being mountainous country in the vicinity of the Lindis Pass as shown on Map 65 of the Operative Central Otago District Plan. It is acknowledged that this portion of the ONL is remote from any roads or public places; and accordingly the CUWLP works here would be visible to few persons. This contrasts to the situation that relates to the proposed duplexing in the Danseys Pass area. Elsewhere the ROX-TWZ-A transmission line passes through Significant Amenity Landscapes and Other Rural Landscapes.

It is anticipated that conditions will address the following matters:

1. The landscape and visual amenity effects of extending or replacing towers or adding new mid-span towers as required as part of the thermal upgrading project.
2. Any landscape and visual amenity effects associated with earthworks required to rectify clearance violations.
3. Hours of operation in locations where the thermal upgrading works are to occur in close proximity to existing dwellings.
4. Mitigation of any adverse effects on flora or fauna.
5. Reinstatement of all land disturbed by earthworks.

It is understood that an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 will be obtained prior to undertaking

	<p>any works that have the potential to adversely affect archaeological sites.</p> <p><i>2. Local iwi contacts other than Ngai Tahu, and details on any accords or agreements you have with iwi that relate to decision-making on resource consents.</i></p> <p>Aukaha – Dunedin based iwi consultation agency that we regularly work with on resource management matters.</p> <p><i>3. Local groups with an interest in energy, freshwater, biodiversity and environmental issues. This will help identify who the expert consenting panel could seek comment from.</i></p> <ul style="list-style-type: none"> <li>• Central Otago Environmental Society – all environmental matters</li> <li>• Haehaeata Natural Heritage Trust – biodiversity matters</li> <li>• Mokihi Trust – biodiversity matters</li> <li>• Central Otago Heritage Trust – heritage matters</li> <li>• Otago Goldfields Heritage Trust – heritage matters relating to mining</li> </ul> <p><i>4. Transpower's compliance history in the Otago district.</i></p> <p>See above</p>
<b>Other considerations</b>	<p>There may be synergies for future use of worker accommodation buildings for seasonal workers' accommodation in the Central Otago District.</p>

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**Te Runanga O Arowhenua Society Inc.**



**AORAKI**  
ENVIRONMENTAL  
CONSULTANCY LTD

21 August 2020

Hon David Parker  
Environment Canterbury  
Private Bag 18041  
Parliament Buildings  
WELLINGTON 6160  
[delivered to: fasttrackconsenting@mfe.govt.nz]

Tēnā koe Hon Mr Parker,

**COVID-19 RECOVERY (FAST-TRACK CONSENTING) ACT 2020 – CLUTHA UPPER WAITAKI LINES PROJECT (CUWLP) PROJECT WORKS AND WORKERS' VILLAGE**

Te Rūnanga o Arowhenua (Arowhenua) and Aoraki Environmental Consultancy Limited (AEC) thank you for the opportunity to provide written comment on whether the Clutha Upper Waitaki Lines Project shall proceed under the Covid-19 Fast Track Consenting process.

Arowhenua and AEC are unclear from the correspondence to date as to which portions of the project will be fast tracked and which portions of the project will proceed through the typical Resource Management Act 1991 process. In addition to this, Arowhenua and AEC have not yet had an opportunity to meet with Transpower to discuss the proposal and how it will impact Arowhenua.

For the reasons outlined above, Arowhenua and AEC do not currently support the Fast Track process; however, Arowhenua and AEC reserve the right to change this view once we have spoken with Transpower on 25 August 2020.

Please contact the writer if you have any questions; otherwise, thank you for your instructions.

Ngā mihi,

**Kylie Hall**  
Principal Planner (MNZPI)  
Aoraki Environmental Consultancy Limited  
Mobile: [REDACTED] s 9(2)(a) | Office: 03 684 8723



August 21 2020

Hon David Parker  
Minister for the Environment  
Private Bag, 18041,  
Parliament Buildings,  
Wellington 6160,  
New Zealand

Tēnā Koe,

**RE: COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Clutha Upper Waitaki Lines Project (CUWLP) Project Works and Workers' Village**


Thank you for sending through the application from Transpower for the Upper Waitaki Lines Project (CUWLP) Project Works and Workers Village. We understand you received this under the COVID-19 Recovery (Fast Track Consenting) Act 2020.

Ngāi Tahu ki Murihiku are only commenting on the area that is South of the Mata-au, part of the line being upgraded from Roxburgh to Cromwell. With the information provided, we do not oppose the application being fast-tracked and referred to an expert consenting panel.

However Ngāi Tahu ki Murihiku would welcome the opportunity to have a wider discussion around Murihiku Energy Supply from Manapouri being transported north if the Tiwai Point aluminium smelter closes. Particularly in regard to future and the hauora health of the Waiau Awa.

We trust the information contained within this letter is sufficient; however, should you wish to discuss any aspect further, please do not hesitate to contact me.

Nāhaku noa nā,



Dean Whaanga  
Te Ao Marama Inc.  
Kaupapa Taiao Manager



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## Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for local authorities to provide comments to the Minister for the Environment on the decision to refer projects to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

Local authority providing comment	Otago Regional Council
Contact person (if follow-up is required)	Joanna Gilroy
	Manager Consents
	s 9(2)(a)

### Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Clutha Upper Waitaki Lines Project (CUWLP) – Project Works and Workers' Village
<b>General comment</b>	<p>The Regional Plan Water for Otago has permitted activities with regard to discharges and water abstractions that the project might meet. Resource consents for activities in or near watercourses may require a resource consent. The Regional Plan Air for Otago, also has permitted activities that the proposal may also met. Once more details are known this can be confirmed with Transpower. It is anticipated that the works that require a resource consent that the Otago Regional Council has jurisdiction over could be processed non-notified and within Statutory timeframes.</p> <p>Resource consents will likely be required from the Central Otago District Council. The transmission upgrade, which can largely be consented out under the NES for Electricity Transmission Activities and NES for Assessing and Managing Contaminants in Soil to Protect Human Health; and, 2. The Workers' Village can be consented under the Central Otago District Plan. The Central Otago District Council will provide a response to the MFE separately on these matters.</p>
<b>Is Fast-track appropriate?</b>	No. Based on previous applications of similar activities, it is anticipated that the consent process would be without public notification and within statutory timeframes.
<b>Environmental compliance history</b>	No compliance issues relate to Transpower

<p>Insert responses to other specific requests in the Minister's letter (if applicable)</p>	<p><b>1. Any local environmental or resource management issues that may affect, or be affected by this project.</b></p> <p>Effects on surface water and groundwater would be the main effects under consideration.</p> <p><b>2. Local iwi contacts other than Ngai Tahu, and details on any accords or agreements you have with iwi that relate to decision-making on resource consents. This will help identify who the expert consenting panel could seek comment from.</b></p> <p>Given this is an area of shared interest; it is appropriate that consultation occurs with runanga through Aukaha, Te Ao Marama Inc and Arowhenua.</p> <p><small>s 9(2)(g)(i)</small></p> <p><b>3. Local groups with an interest in energy, freshwater, biodiversity and environmental issues. This will help identify who the expert consenting panel could seek comment from.</b></p> <p>Depending on the level of riverbed disturbance, as well as Fish and Game Otago and Department of Conservation, water users that have access to watercourses should be consulted with. In terms of groundwater abstraction surrounding groundwater users who are affected by drawdown should be consulted. In terms of the discharge to land from the workers quarters, surrounding groundwater users should be consulted. If the discharge affects surface water, Fish and Game Otago and Department of Conservation, Iwi and water users that have access to watercourses should be consulted with.</p> <p><b>4. Transpower's compliance history in the Otago region.</b></p> <p>Our Compliance Team have advised there have been no compliance issues with regard to Transpower operating in the Otago Region.</p>
<p><b>Other considerations</b></p>	<p>Clarification of all activities relating to discharges to air, working in watercourses, and affecting groundwater would enable a thorough assessment of the potential consent process.</p>

## Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for local authorities to provide comments to the Minister for the Environment on the decision to refer projects to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

<b>Local authority providing comment</b>	Environment Canterbury
<b>Contact person</b> (if follow-up is required)	Virginia Loughnan
	Consents Planning Manager
	s 9(2)(a)

### Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Clutha Upper Waitaki Lines Project (CUWLP) Project Works and Workers' Village –
<b>General comment</b>	No comment
<b>Is Fast-track appropriate?</b>	No comment at this stage
<b>Environmental compliance history</b>	See below
<b>Insert responses to other specific requests in the Minister's letter (if applicable)</b>	See below
<b>Other considerations</b>	See below

**Any local environmental or resource management issues that may affect, or be affected by this project**

- The Workers Village is not located within Canterbury, therefore we have not considered the resource management issues of that portion of the project.
- Duplexing:  
It is acknowledged that this aspect of the CUWLP involves work on existing infrastructure. It is also acknowledged that much of this work is a permitted activity in terms of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA).

Given that the transmission lines exist, the addition of conductors (wires) on the transmission line will, per se, have little effect on the environment.

Potential adverse effects on the environment are associated with the establishment of pulling/tensioning sites [wiring sites] 4km-6km apart, foundation strengthening to support the additional load and, in some instances, tower replacement.

We anticipate that the potential adverse effects will be related to earthworks, namely effects on water quality through sediment loss/discharge, on biodiversity, and where works are in or adjacent to water, effects on flood-carrying capacity and erosion. In addition there will be effects on land owners and Iwi.

We also anticipate there may be effects on air quality due to dust and/or other contaminants being discharged as a consequence of the works, and on water quality due to the management of stormwater/dewatering water during construction activities.

It is anticipated that conditions of consent will address:

- erosion and sediment control
- mitigation of any adverse effects on flora or fauna.
- reinstatement of all land disturbed by earthworks
- dust/contaminant management

It is understood that an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 will be obtained prior to undertaking any works that have the potential to adversely affect archaeological sites.

**Thermally Uprating:**

Again it is acknowledged that this aspect of the CUPLP relates to existing infrastructure; and that some activities are permitted in terms of the NESETA.

Thermally uprating the transmission line has no particular effect on the environment per se; but adverse effects on the environment may result from works to address the resulting conductor sag and need to achieve compliance with the New Zealand Electrical Code of Practice 34 (NZECP 34).

We anticipate that the potential adverse effects will be related to earthworks, namely effects on water quality through sediment loss/discharge, on biodiversity, and where works are in or adjacent to water, effects on flood-carrying capacity and erosion. In addition there will be effects on land owners and Iwi.



We also anticipate there may be effects on air quality due to dust and/or other contaminants being discharged as a consequence of the works, and on water quality due to the management of stormwater/dewatering water during construction activities.

It is anticipated that conditions of consent will address:

- erosion and sediment control
- mitigation of any adverse effects on flora or fauna.
- reinstatement of all land disturbed by earthworks
- dust/contaminant management

It is understood that an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 will be obtained prior to undertaking any works that have the potential to adversely affect archaeological sites.

#### Other Resource Management Issues

- Meridian/Genesis Reconsenting – would this affect electricity generation and change the scope of the generators' consents? Would any of the works occur in areas that are subject to the science programmes the generators are undertaking to support their applications and would they be impacted?
- The maps are quite high scale, but potential overlap with the Kurow-Duntroon Irrigation Scheme Pipeline installation (Kurow-Duntroon Irrigation Company Limited PO Box 77 Kurow 9446)
- Bylaw authority may be required from Environment Canterbury Engineering section even if consent not required
- Lower Waitaki erosion- works within or adjacent to the Waitaki River need to take into account the erosion issues – future-proof the infrastructure and not exacerbate the issue – contact Environment Canterbury.

**Local iwi contacts other than Ngai Tahu, and details on any accords or agreements you have with iwi that relate to decision-making on resource consents. This will help identify who the expert consenting panel could seek comment from.**

As noted in the application from Trustpower, AEC and Aukaha are the relevant Rūnanga Advisory Services to seek advice from – they represent the interests of Arowhenua, Waihao and Moeraki Rūnanga who have interests in the area under application. There are no other iwi contacts. Our Service Level Agreements with the three Rūnanga, AEC and Aukaha are the relevant documents regarding decision-making on resource consents. The expert panel should seek comment from AEC and Aukaha in the first instance. If required, ECan can provide names of potential expert panel members that have cultural (and in many cases, other) expertise and hold Making Good Decisions accreditation .

#### AEC Contacts:

- PO Box 885, Timaru 7940
- Planner: [redacted] s 9(2)(a) (Kylie Hall)
- Office: [redacted] s 9(2)(a) (Ally Crane, General Manager)
- Office: 03 684 8723

#### Aukaha Contact:

- P O Box 446 Dunedin 9058
- 03 477 0071
- [redacted] s 9(2)(a) (Tania Richardson)



**Local groups with an interest in energy, freshwater, biodiversity and environmental issues. This will help identify who the expert consenting panel could seek comment from**

- Mackenzie Agency Alignment Programme. The 5 Agencies involved in land management /regulation within the Mackenzie Basin have a collection of projects to ensure aligned delivery of land management services. (Land Information New Zealand, Department of Conservation, , Mackenzie District Council, Waitaki District Council, Environment Canterbury). Contact via Annabelle Dunne Annabelle Dunn, Programme Manager s 9(2)(a)
- Upper and Lower Waitaki Zone Committees (contact via Environment Canterbury)
- Central South Island Fish and Game ( Contact via Jay Graybill, Chief Executive, s 9(2)(a)
- Mackenzie Guardians are concerned about indigenous ecosystem loss and landscape transformation in the Mackenzie Basin (Contact Rosalie Snoyink s 9(2)(a)
- Waitaki Irrigators Collective WIC was created to provide a collective voice for approximately 580 irrigators who take water from the lower Waitaki River (Contact via Level 1, 72 Thames Street PO Box 159 Oamaru [www.waitakiirrigators.co.nz](http://www.waitakiirrigators.co.nz) info@waitakiirrigators.co.nz)

#### **Transpower's compliance history in the Canterbury region.**

**Compliance History – see attached excel spreadsheet**

General notes:

CRC122838 - Land use to store a hazardous substance – Islington Chch

- 2016 Non compliance Action Required for cracks and holes in base and walls of Transformer Park, however this was graded in 2019 Compliant due to the repair work being carried out.

CRC155699 – 31 Gilberthorpes Road chch – Use Land for storage of hazardous substances

- 2016 Site visit Non compliance Action Required – Diesel area bunding has cracks. Kate Mandis (Transpower SI Environmental Advisor) confirmed that this would be fixed. Nothing on file to indicate that this has been remediated.

CRC163140 – 552 Taylor Road Orari To take and Use Groundwater

- 2020 Significant NC, water taken whilst on restriction overuse of 5.3 days, follow up desktop inspection scheduled for Jan 2021

CRC167592 – 552 Taylor Road, Orari to use land for a farming activity

- 2019 Desktop inspecton Non compliance no action required, FEP audit was not carried out in first exercise of consent due April 2017, received a b grade in latest audit, so FEP is required April 2021

CRC173985- 70 & 80 Ruru Road, Bromley chch – Discharge industrial stormwater to a watercourse

- 2017 Compliant response to Oil Spill, follow up site visit graded compliant due to all mitigation measures implemented

CRC173986 – 70 & 80 Ruru Road Bromley chch – Discharge stormwater to an artificial watercourse via ccc stormwater network

- 2017 – Site visit respond to complaint of oil spill, follow up site inspection graded compliant due to all mitigation measures implemented

CRC173991 – Moffat Street Islington, chch – Discharge water containing contaminants

- 2017 site inspection non compliance action required for further bunding work required, hydrostatic test to check bunds
- 2018 Site inspection Non compliance action required some repairs had been made to bunds, however other bunds may contain traces of PCB needed to be completed first
- 2019 Site visit Complies repair work is in progress and given assurances that bund crack repair work will be completed by Sarah Mclean (Transpower Technical Lead)

CRC173994 – Corner Island Road and Audley Road Kaipoi – Discharge contaminants into land

- 2018 site inspection – data on maintenance work and observations appears incomplete, desktop inspection 2019 regraded compliant with information provided

CRC971727 – Moffat street Islington, Discharge stormwater containing contaminants from main switch yard into ground via oil separation tanks and soak hole system

- 2016 site inspection repair work had been done on cracked bunding with some cracks still evident

Overall looking through the compliance history I don't see any major compliance concerns, with no abatement notices, only one significant non compliance which is a water data overuse.

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**From:** s 9(2)(a)  
**To:** [Fast Track Consenting](#); s 9(2)(a)  
**Subject:** FW: Letter from Minister Parker  
**Date:** Monday, 24 August 2020 9:14:15 am  
**Attachments:** [image002.png](#)

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Comments from Aukaha

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**From:** Tracey Gallagher s 9(2)(a)  
**Date:** Monday, 24 Aug 2020, 9:11 AM  
**To:** Rereata Hardman-Miller s 9(2)(a)  
**Cc:** Mary Carrington s 9(2)(a)  
**Subject:** FW: Letter from Minister Parker

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**From:** Maree Kleinlangevelsloo s 9(2)(a)  
**Sent:** Friday, 21 August 2020 4:59 PM  
**To:** D Parker (MIN) s 9(2)(a)  
**Cc:** Rachel Wesley s 9(2)(a)  
**Subject:** RE: Letter from Minister Parker

Tena koe Minister

Thank you for your letter. We appreciate the chance to comment on whether the Transpower application should be fast tracked.

Your letter suggested that both aspects of the application (the workers' village and the lines upgrade) would be fast tracked. However, a meeting with the applicant in the last few days suggested that only the workers' village was being fast tracked. The applicant said there was no intent to fast track the upgrade of the lines and this work would follow the usual RMA process. In the meeting Aukaha requested further information about the location and nature of the workers' village. The map in the application does not have any roads or townships marked on it, but we understand the location is near Ranfurly. I understand that there was no additional information about the workers' village provided other than it could be either temporary buildings or campervans. This level of information does not allow Aukaha to make recommendations to runaka about whether fast-tracking is suitable.

Further correspondence with the applicant confirmed this morning that the fast tracking application does include the lines upgrade. Due to the confusion about which aspects of the application were being fast tracked, I have not had the opportunity to discuss the merits or otherwise of fast tracking this application with ka runaka.

Otago runaka recognise that this application will affect runaka to the south and north of Otago in different ways. It would be useful to deal with this application holistically, and have time to liaise with the other runaka to understand their positions. I am concerned that fast tracking this application will force runaka into having to respond in a tight, shortened window. In Otago we are already overwhelmed with water-related mahi as a result of the Skelton Report, deemed permit deadlines and the five district councils in Otago simultaneously reviewing their district



plans. The potential effects from the proposal include lines going through wahi tupuna, works in rock art areas, cutting of new tracks, vegetation removal, water related effects from the construction and operation of the village and effects on landscape values, each of which could have significant cultural effects.

I consider that cultural values could be compromised through a fast tracked application. As such I cannot support the fast tracking of this application based on the information provided to date.

Ka mihi

**Maree Kleinlangevelsloo**  
**Acting Manager - Mana Taiao**

Telephone: (03) 471 5480

Mobile: s 9(2)(a)

Email: s 9(2)(a)

Website: [www.aukaha.co.nz](http://www.aukaha.co.nz)



Level 1, 258 Stuart Street, P O Box 446, Dunedin 9054



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**From:** D Parker (MIN) s 9(2)(a)

**Sent:** Friday, 7 August 2020 12:08 PM

**To:** Nicola Morand [REDACTED] s 9(2)(a)  
**Cc:** Maree Kleinangevelsloo [REDACTED] s 9(2)(a)  
**Subject:** Letter from Minister Parker

Dear Nicola Morand

Please find attached a response to your email/letter dated..

Kind regards

Tracey

**Office of Hon David Parker**

Office of Hon David Parker MP | Attorney-General | Minister for the Environment | Minister for Trade and Export Growth | Associate Minister of Finance

Authorised by Hon David Parker MP, Parliament Buildings, Wellington

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Released under the provision of  
the Official Information Act 1982

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## Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for local authorities to provide comments to the Minister for the Environment on the decision to refer projects to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

Local authority providing comment	Waitaki District Council
Contact person (if follow-up is required)	Hamish Barrell
	Planning Manager
	s 9(2)(a)

### Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Clutha Upper Waitaki Lines Project
<b>General comment</b>	<p>The Waitaki District Council is aware of the electricity transmission constraints and how the impending closure of Tiwai Point Aluminium Smelter will impact how the unused power will be redistributed.</p> <p>The Waitaki District is traversed by two main lines, passing through iconic landscapes, which include the Mackenzie Basin and the Danseys Pass. While these may be compromised to some degree by the existing transmission network, it would not be in the interests of Aotearoa New Zealand for even more significant adverse effects to impact on these internationally iconic landscapes.</p>
<b>Is Fast-track appropriate?</b>	The Waitaki District Council see limited benefit in activating the fast track process. The upgrading of the transmission lines could have a significant impact on the natural environment within the Mackenzie Basin and the Danseys Pass.
<b>Environmental compliance history</b>	None that we are aware of.

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the Official Information Act 1982

Insert responses to other specific requests in the Minister's letter (if applicable)

1. Any local environmental or resource management issues that may affect, or be affected by this project.

Duplexing the Roxburgh-Naseby-Livingstone Circuits:

It is acknowledged that this aspect of the CUWLP involves work on existing infrastructure, being part of the ROX-ISL-A transmission line with works continuing through the Danseys pass through to Livingstone. It is also acknowledged that much of this work is a permitted activity in terms of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA).

The existing transmission lines run through highly scenic areas. Have any alternative routes been considered, which could then service the future needs of the east coast of the South Island?

Given that the transmission lines exist, the addition of conductors (wires) on the transmission line will, *per se*, make the lines a more obvious visual feature.

Potential adverse effects on the environment are associated with the establishment of pulling/tensioning sites [wiring sites] 4km-6km apart, foundation strengthening to support the additional load and, in some instances, tower replacement. The Roxburgh-Naseby-Livingstone transmission line generally passes through rural scenic areas and areas of Outstanding Natural Landscape.

The existing ROX-ISL-A transmission line passes through Danseys Pass area which is zoned as rural scenic. It is anticipated that the potential adverse effects of earthworks associated with duplexing will be given consideration in this environment. It is anticipated that current access will be used to access the pylons, but it is anticipated in some areas, earthworks will need to be conducted to upgrade the existing access tracks. Further information will be required to fully understand the nature of the impact to areas of significance.

It is anticipated that conditions of consent will address the following matters:

The landscape and visual amenity effects of the upgrading of the towers.

1. Any landscape and visual amenity effects associated with wiring sites, foundation strengthening and access track upgrading.
2. Mitigation of any adverse effects on flora or fauna.
3. Reinstatement of all land disturbed by earthworks including wiring sites, foundation strengthening and the edges of access tracks.
4. It anticipated that there is an impact on biodiversity within the Danseys Pass that may be impacted from creating access for the pylon maintenance. In order to fully understand this an expert ecologist should be consulted.
5. Special notice needs to be given for the sections of the transmission lines that run through areas of Outstanding Natural Landscape that is indicated in the current Waitaki District Plan.

- 
6. The current transmission line is located next to important Geopark sites which will need to be factored in during the upgrading process.

It is understood that an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 will be obtained prior to undertaking any works that have the potential to adversely affect archaeological sites. The application documentation advises that such archaeological authorities are likely to be required, in particular, in the Danseys Pass area.

Thermally Upgrading the Cromwell-Twizel Circuits:

Again it is acknowledged that this aspect of the CUPLP relates to existing infrastructure; and that some activities are permitted in terms of the NESETA.

Thermal upgrading is proposed on the ROX-TWZ-A transmission line, which passes through the Mackenzie Basin. This transmission line passes through rural scenic areas within the district; but adverse effects on the environment may result from works to address the resulting conductor sag and need to achieve compliance with the New Zealand Electrical Code of Practice 34 (NZECP 34).

Landscape and visual effects are likely to be associated with mid-span earthworks that are necessary to achieve compliance with the minimum separation requirements of NZECP 34. Alternative rectification works such as increasing the height of towers through a body extension or a full tower replacement, or adding a tower mid-span, are also likely to have landscape and visual amenity effects.

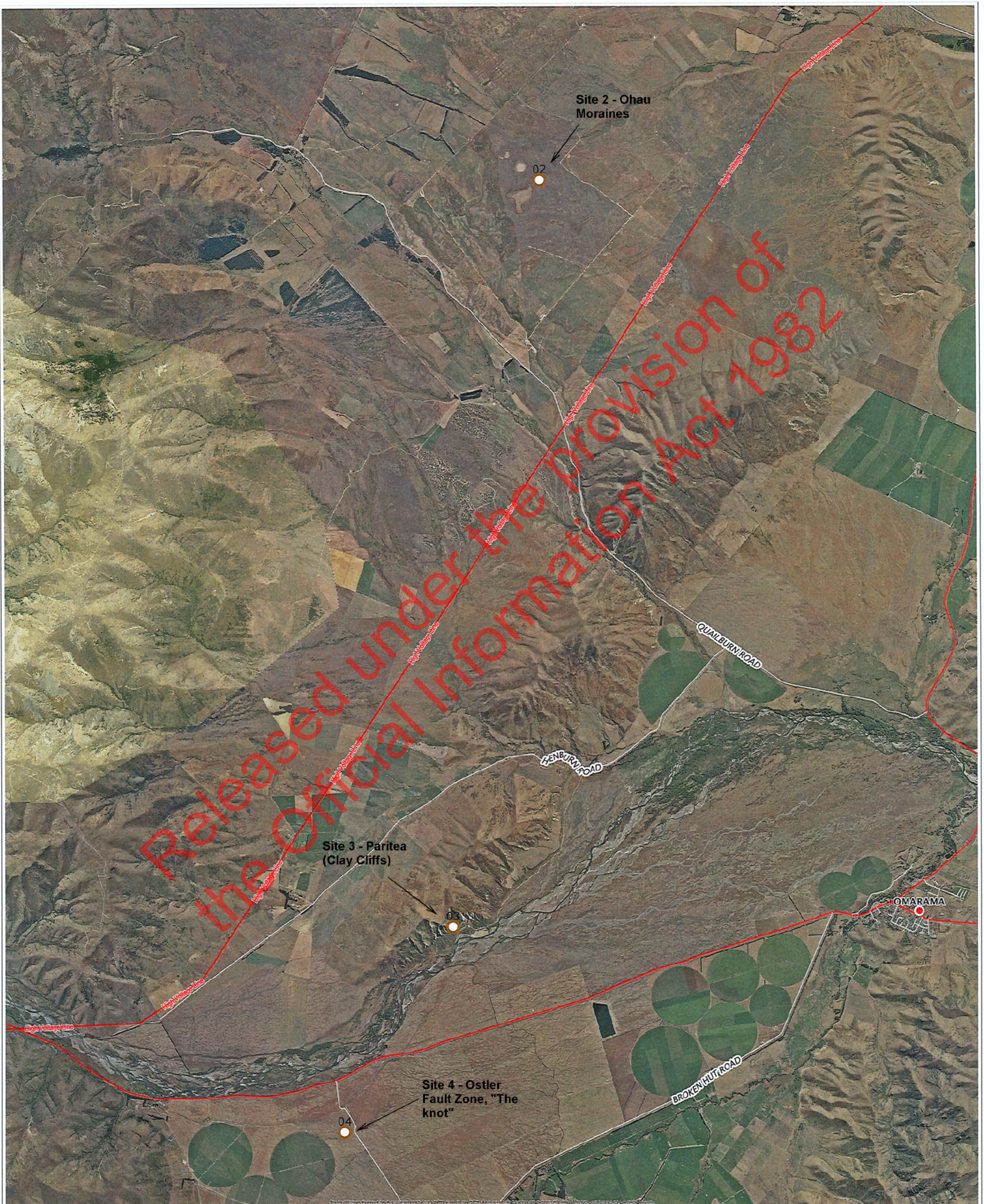
ROX-TWZ-A transmission line passes through outstanding natural landscapes and other rural scenic landscapes.

It is anticipated that conditions will address the following matters:

1. The landscape and visual amenity effects of extending or replacing towers or adding new mid-span towers as required as part of the thermal upgrading project.
  2. Any landscape and visual amenity effects associated with earthworks required to rectify clearance violations.
  3. Hours of operation in locations where the thermal upgrading works are to occur in close proximity to existing dwellings.
  4. Mitigation of any adverse effects on flora or fauna.
  5. Reinstatement of all land disturbed by earthworks.
  6. Attention to be given to the section of the transmission line that runs through Outstanding Natural Landscape within the Mackenzie basin.
  7. It anticipated that there may be an impact to biodiversity within the Mackenzie Basin that could be impacted during the transmission lines upgrading process. In order to fully understand this an expert ecologist should be consulted.
  8. There are two Waitaki Whitestone Geopark Sites (an aspiring UNESCO Global Geopark site, endorsed and submitted for consideration to Paris by the New Zealand National Commission for UNESCO) located within close
-

	<p>proximity to the existing transmission lines which will need to be taken into consideration during the upgrading process. Wherever practicable, lines should be routed along routes that do not give rise to visual pollution.</p> <p>It is understood that an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 will be obtained prior to undertaking any works that have the potential to adversely affect archaeological sites.</p> <p><i>2. Local iwi contacts other than Ngai Tahu, and details on any accords or agreements you have with iwi that relate to decision-making on resource consents.</i></p> <p><i>Waitaha Taiwhenua o Waitaki</i>– This group is the representative body of Waitaha in this area and have occupied the land in the Waitaki Region for many generations.</p> <p><i>3. Local groups with an interest in energy, freshwater, biodiversity and environmental issues. This will help identify who the expert consenting panel could seek comment from.</i></p> <ol style="list-style-type: none"> <li>1. Mackenzie Trust</li> <li>2. Waitaki Whitestone Geopark Trust</li> </ol> <p><i>4. Transpower's compliance history in the Otago district.</i></p> <p>See above</p>
<b>Other considerations</b>	<p>Further information is required to fully understand the nature of this project and how it will impact the natural environment within the Danseys Pass and Mackenzie Basin.</p>





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1cm = 619.01 m

**Labelling**  
+ Label-Address  
RAPID Address  
URBAN Address  
Township

2\_Ward Townships  
3\_Small Scale Townships  
**Geopark**  
Geosites  
**Planning**

**District Plan**  
DP Zoning Layers  
DP Powerlines  
**Roading**  
Roads

1\_SH  
2\_Road  
3\_Road without RAMM ID  
**Imagery**  
Aerials Latest





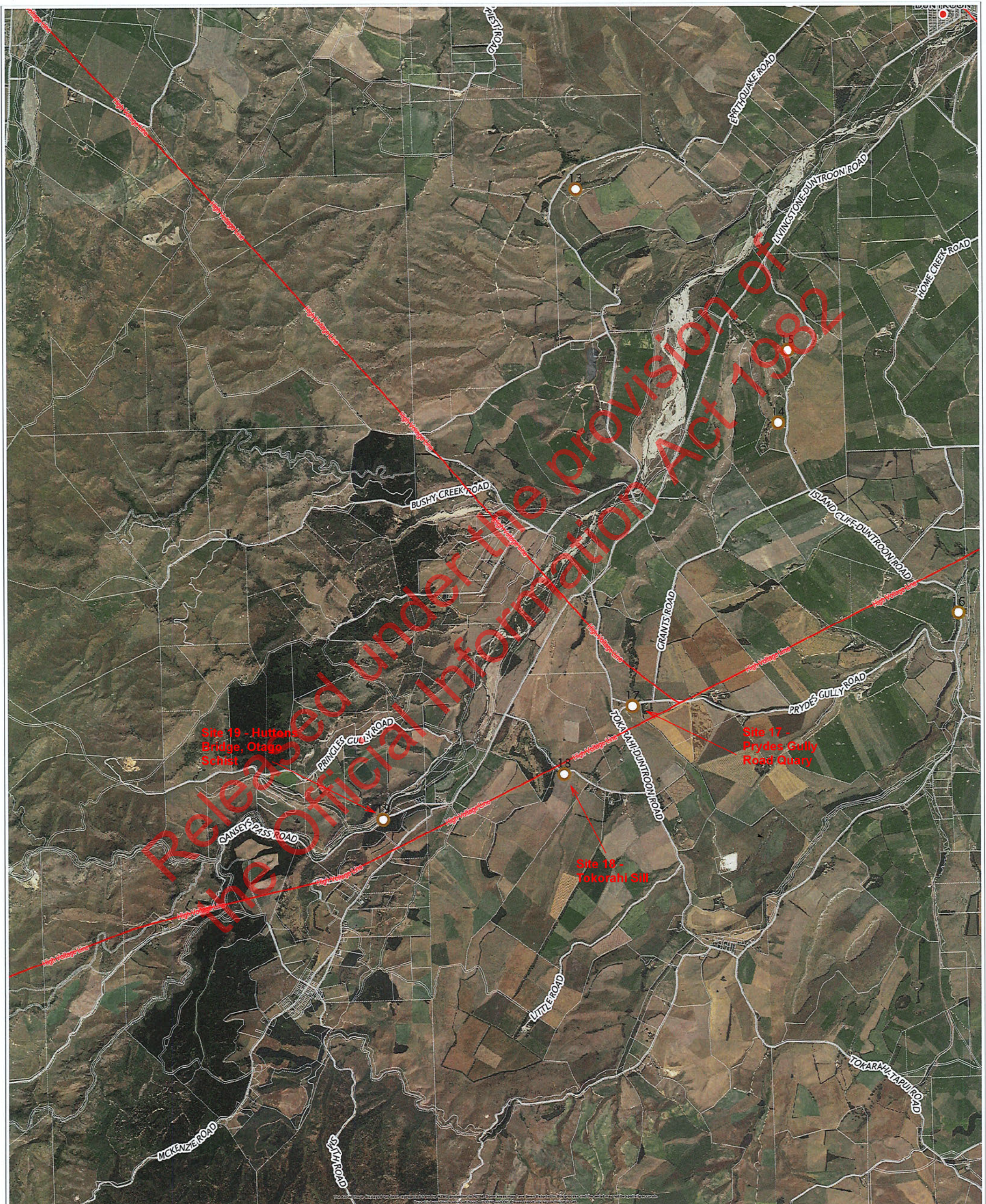


# Waitaki

DISTRICT COUNCIL  
TE KAUNIHERA A ROHE O WAITAKI

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Centred on NZTM: [ 1,411,236.963 ; 5,023,010.147 ; 0.000 ]

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1cm = 442.95 m

**Labelling**  
+ Label-Address  
RAPID Address  
URBAN Address  
Township

2\_Ward\_Townships  
3\_Small Scale Townships  
**Geopark**  
Geosites  
**Planning**

**District Plan**  
DP Zoning Layers  
DP Powerlines  
**Roading**  
Roads

1\_SH  
2\_Road  
3\_Road without RAMM ID  
**Parcels and Titles**  
Parcel

