

# SUMMARY OF EVIDENCE

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Submitter 600 / Further Submitter 1132

*Proposed Queenstown Lakes District Plan - Energy & Utilities, Temporary Activities and Noise.*

## Summary of Evidence on behalf of Federated Farmers of New Zealand

My name is David Cooper. I am a Senior Policy Advisor for Federated Farmers of New Zealand. I have a Bachelor of Commerce in Economics and a Master of Arts in Politics.

Our submissions are primarily focussed on the Energy & Utilities Chapter, particularly on the impacts of provisions where these relate to energy and utility infrastructure on private land. We recognise that the operation and maintenance of energy and utility infrastructure is important for the wellbeing of our communities, and support the appropriate provision of these activities through the district plan. However, we are keen to ensure that the proposed provisions appropriately consider the impact of these activities on other land uses, particularly farming in the rural areas of the District.

We are particularly interested in the implementation of the National Policy Statement on Electricity Transmission (NPSET), given a significant proportion of electricity transmission assets are located on land used for primary production. We consider implementation of the NPSET should be balanced against the potential for adverse impacts on farming. We are also keen to ensure recognition that the focus of the NPSET is on the National Grid, as distinct from the local distribution network.

A key notified provision relating to our concerns is proposed Policy 30.2.6.4. The Officer's report has recommended new policy 30.2.6.6 and rule 30.5.10 to distinguish between transmission lines (National Grid) and sub-transmission networks, and to afford what is considered within the Officer's report to be sufficient protection to the sub-transmission network. We agree that the sub-transmission network is of importance to the District, and that it is useful to distinguish between the sub-transmission network and the local distribution network.

However, we question whether this importance is sufficient to require specific protection under the proposed district plan. If this was the case, we consider this would have been provided for in the NPSET.

As a result, we consider that Policy 30.2.6.4 and indeed any protection should apply only to the National Grid, and that the risks posed to the sub-transmission network could be addressed simply by referring plan users to the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001). As a second preference, we support a distinction being made between the sub-transmission network and the local distribution network.

However, we are opposed to the amendments recommended in relation to Policy 30.2.6.4, in that the controls around the proximity of buildings, structures and vegetation to existing transmission corridors, is expanded to include “*buffer distances for managing subdivision and land use development near the National grid*”. Subdivision in the rural zones will not always be because the landowner is seeking to establish a building platform. We consider the controls should address buildings and development rather than subdivision.

We are opposed to inclusion of the word ‘upgrading’ in proposed new policy 30.2.6.6. There is an important distinction to be made between the *maintenance and operation* of the sub-transmission network and the potential for *upgrading* as the latter may increase the adverse impact of that infrastructure on neighbouring land use.

As an alternative, we support the recommendations the Officer’s report makes to a proposed definition: Minor Upgrading. We agree that the impacts of upgrades along the lines included in this definition on adjoining land are likely to be minor or insignificant and consider the reference to ‘upgrading’ in proposed new Policy 30.2.6.6 should be amended to stipulate ‘minor upgrading’. We also ask that Policy 30.2.6.1 and any subsequent rules are similarly amended to stipulate that the intent is to capture ‘minor upgrading’ of the transmission infrastructure network.

In respect to proposed new Rule 30.5.10, our concerns in relation to addition of the sub-transmission network aside, we agree with the proposed wording of the rule as this is focussed on providing protections from activities which pose a risk to the electricity transmission infrastructure. We also support the Officer’s report recommendation that Rules 30.5.11.8 and 30.5.11.9 remain permitted activity rules as notified, as these pose little risk to transmission infrastructure, and are everyday farming activities for which farmers should not be required to seek consent.

Overall we support the intention behind the proposed provisions relating to temporary activities. We specifically support proposed Policy 35.2.5.1 and Policy 35.2.5.2, and have no objections to the Officer’s report recommendation that relocated buildings in the rural area will now be addressed through amended rule 35.4.2.