

10 April 2015

Thames Coromandel Proposed District Plan Hearings Panel  
Thames Coromandel District Council  
Private Bag  
Thames, 3540  
Via email: [lisa.madgwick@tcdc.govt.nz](mailto:lisa.madgwick@tcdc.govt.nz)

Dear Sir/Madam

**HEARING REPORT: PROPOSED THAMES COROMANDEL DISTRICT PLAN –  
SECTION 9 AND 32 – Landscape  
Transpower Submission Point 832.6 and Further Submission Points FS832.32, FS832.33,  
FS832.36, FS832.38, and FS832.19**

We write in relation to the hearing commencing on 14 April 2015 on Section 9 – Landscape and Section 32 Landscape Overlay Rules of the Proposed Thames Coromandel District Plan (**PDP**).

***Relief Sought in Transpower Submission***

In addition to wider provisions relating to the ongoing operation and maintenance of the National Grid, Transpower New Zealand Limited (Transpower) submitted two points on Section 9 being:

- I. Retention of Objective 9.3.1
- II. Retention of Policy 9.3.1c

In addition, Transpower lodged one further submission point on Section 9, and a number of further submission points on Section 32 Landscape Overlay Rules. We note that a number of these points were to the Natural Character and Amenity landscape provisions which at this stage are to be removed from the proposed plan as a result of the Council resolution<sup>1</sup> and Section 42A Report recommendation<sup>2</sup>.

***Section 42A Officers Report***

We have reviewed the Section 42A Reports on the above provisions and make the following comments specific to the submission points sought by Transpower.

***Section 9 Objective 9.3.1 (Submission Point 832.6)***

We support the officer recommendation in respect of the retention of Objective 9.3.1 as the retention of the objective reflects the relief sought by Transpower in its submission.

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<sup>1</sup> Council Resolution 4 March 2015

<sup>2</sup> Section 42A Hearing Report and Section 32AA Further Evaluation Report on Section 9 – Landscape

*Section 9 Policy 9.3.1c (Submission Point 832.6)*

While contrary to the relief sought in the Transpower submission, we accept the officer recommendation for the removal of Policy 9.3.1c<sup>3</sup> on the basis Policy 19.3.1f within Section 19 Network Utilities relates to Network Utilities within outstanding landscapes (and policy 19.3.1f is retained).

*Section 32 Landscape Rules – Operation, maintenance, and minor upgrading (Submission Point FS832.32)*

Transpower submitted in support of Submission Point 1241.11 seeking a new permitted rule relating to the operation, maintenance, and minor upgrading of an existing electricity line as a permitted activity. Although we note such a rule is provided in the zone rules, we support the Section 42A Report recommendation for the insertion of a rule (Rule 3A) clarifying that the minor upgrading or removal of an existing electricity line is a permitted activity. We note operation and maintenance are provided for as permitted activities in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.

Transpower also supports new Rule 2A and the amendments to Rules 2 and 3 to:

- Permit earthworks required for minor upgrading or removal of an electricity or telecommunication line (Rule 2(c));
- Permit the clearing of indigenous vegetation required for minor upgrading or removal of an electricity or telecommunication line (Rule 2A(c)); and
- Permit the erection of signs by network utility operators (Rule 3(a)).

Transpower suggests a further amendment to new Rule 2A would be useful for landowners and electricity network providers clearing vegetation to maintain safety clearances, and would be consistent with Rule 2A(d). Transpower suggests Rule 2A(c) is amended as follows:

(c) it is required for minor upgrading or removal of an electricity or telecommunication line, or to maintain safety clearances for these lines.

*Section 32 Landscape Rules – Upgrading and development as a permitted activity (Submission Point FS832.32, FS832.33, FS832.36 and FS832.38)*

Transpower submitted in support of Submission Points 1241.11, 1188.6, 877.12 and 13, 878.11 and 12 seeking a discretionary activity status for any new above ground electricity or telecommunication line or facility. The Section 42A Report does not recommend the relief sought be accepted, rather the non-complying activity status provided in Rule 7 of the Proposed Plan remain.

Given the national significance of the National Grid, as recognised in the National Policy Statement on Electricity Transmission 2008 (“NPSET”), Transpower remains supportive of a discretionary activity status. Such an activity status would give effect to Policy 2 of the NPSET, noting that resource consent would still be required and Policies 3, 4 and 8 of the NPSET relate to a number of matters that require consideration in managing the environmental effects of transmission. One option to give effect to the NPSET would be to specifically identify the development of the National Grid as a discretionary activity.

Transpower request that this letter be tabled at the hearing, in support of Transpower’s original submission points and the Section 42A Report recommendations as outlined above.

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<sup>3</sup> Policy 9.3.1c *Network utilities that cannot practicably be located outside of an ONFL outstanding Landscape shall be located away from ridgelines and prominent landforms. Where they must necessarily cross a ridgeline the adverse visual effects shall be remedied or mitigated as far as practicable, such as by tunnelling underneath, camouflage or vegetative screens.*

Should you require clarification of any matter, please contact Jo Mooar Environmental Regulatory Team Leader at Transpower (04 590 6060), or on the following email: [environment.policy@transpower.co.nz](mailto:environment.policy@transpower.co.nz).

Yours faithfully

Joanne Mooar  
Environmental Regulatory Team Leader

Transpower New Zealand Ltd [The National Grid](#)