

Objectives

Approach

We have taken the New Objectives table and distilled the table down to three matters for ease of use, being:

1. Issue
2. Objectives
3. Comments

In preparing our comments on the draft objectives, we have focussed on the higher order strategic planning documents that the Waikato Proposed District Plan must give effect to, as required by Section 75(3) of the Resource Management Act. While we have focused primarily on the objectives, we have been mindful of the issues from which the objectives are derived.

In considering the objectives, we have taken the approach that it is a statement of what is to be achieved through the resolution of a particular issue. Objectives could also be considered to be a desired outcome of the district plan. We have also been mindful of the requirement for Council to undertake monitoring under Section 35(2)(b) of the Resource Management Act and assess the efficiency and effectiveness of policies, rules, or other methods in achieving the objectives. That is, we have tried to positively word objectives and ensure they are clear enough to provide targets that policies seek to achieve.

Our approach has been to suggest amendments or matters that we would like to further discuss with the PSC in the comments column. The purpose of the suggested alternative / additional objectives is to facilitate discussion with the PSC.

Issue	Proposed objective	Comments	Transpower feedback May 2017
<p>Issue – Development and operation of infrastructure</p> <p>The development and operation of infrastructure has the potential to positively or negatively impact on our ability to sustainably manage natural and physical resources and to provide for community wellbeing.</p>	<p>Objective 1: Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.</p>	<p>Development of policies relating to this objective can expand on what is provided e.g. the construction, operation and maintenance of infrastructure.</p>	<p>Transpower comment: Transpower would seek changes to this objective or an exclusion to this because it is fairly absolutist in its intent – “does not compromise”, with no qualification. The NPSET requires policies and plans to take in to account the fact that the National Grid may have adverse effects, including being located within sensitive environments where no practicable alternatives are available. Transpower would be interested in how this objective would be read alongside proposed Objective 2 and proposed Objective “4”.</p>
<p>Design, Construction, Maintenance and Operation</p> <p>Design, construction, maintenance and operation of the land transport network can adversely affect the environment through earthworks and structures, increases in sediment and stormwater run-off, and property and community severance.</p>			
<p>Recommended issue:</p> <p>Recognition of:</p> <ul style="list-style-type: none"> • Essential need for infrastructure • Positive effects of infrastructure 	<p>Objective 2: Recognise the importance of infrastructure to the economic, cultural and social well-being of the district.</p>	<p>While the above objective suggests that infrastructure can have negative effects, there is no corresponding recognition that it can have positive effects and is in most cases essential for people’s well-being.</p> <p>In addition to the recommended objective,</p>	<p>Recognise the <u>benefits provided by importance of</u> infrastructure to the economic, cultural and social well-being of the district.</p>

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		<p>wording could also be:</p> <ul style="list-style-type: none"> • Infrastructure enables people and communities to provide for their well-being; or • Recognise the social, economic, cultural and environmental benefits that infrastructure provides. 	
<p>Provision of Utilities Avoids Adverse Effects</p> <p>Land uses and land use intensification, including subdivision, can have adverse effects on the environment if wastewater and stormwater disposal, water supply, energy supply and telecommunications are not adequately provided for or managed.</p>	<p>Objective 3: Land use and development is supported by the appropriate provision of infrastructure.</p>	<p>The current objective suggests that so long as appropriate infrastructure is provided, all adverse effects of use and developments can be managed. This is not the case and there are a range of adverse effects of use and development that have no relationship to infrastructure. Not all adverse effects of use and development will be avoided by the provision of infrastructure.</p> <p>In addition to the recommended objective, which is reworded to better reflect the outcome sought, the following alternatives are also proposed:</p> <ul style="list-style-type: none"> • Land use and development is accompanied by the appropriate provision of infrastructure; or • Land use and development is supported by appropriate infrastructure; or • Land use and development is integrated with the provision of appropriate infrastructure; or • Subdivision, use and development 	<p>Transpower comment: Not specifically relevant to Transpower’s interests, depending on the wording of policies proposed to give effect to this objective. It’s not clear what is meant by “supported”.</p>

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		<p>occurs in a planned and co-ordinated manner alongside infrastructure.</p> <p>The integration of development with infrastructure is a key objective and policy matter in the Waikato RPS and we recommend that it is explicitly addressed in the Waikato Proposed District Plan.</p>	
<p>Significant Industry, Infrastructure, Primary Production and Research Sites</p> <p>Regionally significant industry and infrastructure, primary production and research sites are important for community wellbeing and provide significant social and economic benefits, yet the continued operation and development of these activities can be constrained by the inefficient access to supporting infrastructure, resources and incompatible adjacent landuse activities.</p>	<p>Objective 4: Recognise and protect the operation and development of regionally significant infrastructure.</p>	<p>Notwithstanding the Waikato RPS, we find this an unusual mix of activities to address in a single objective (in the infrastructure chapter). Trying to address too many specific activities may result in a complex and unfocused objective. These kinds of objectives are difficult to assess in terms of the efficiency and effectiveness of policies, rules, or other methods (Section 35(2)(b) of the RMA.</p> <p>There are two possible approaches with regards to the electricity transmission network. The national electricity grid, as defined by the Electricity Industry Act 2010 is included in the definition of Regionally Significant Infrastructure in the RPS (and it is assumed that the Waikato Proposed District Plan will have a similar definition), so any objectives relating to Regionally Significant Infrastructure would include the electricity transmission network. An alternative is to have a specific objective framework to give effect to the National Policy Statement for Electricity Transmission:</p>	<p>I have highlighted the version referencing the National Grid and proposed an amendment, as follows:</p> <p>“The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance, repairs, <u>and</u> upgrading removal is enabled.”</p>

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		<ul style="list-style-type: none"> • The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance, repairs, upgrading and removal is enabled; or • Electricity transmission and renewable electricity generation activities are supported, including maintenance, operation, upgrading and new facilities; <p>One of the policies could be to recognise regionally significant infrastructure through identification on the planning maps, thereby giving effect to the “recognise” component of the objective (notwithstanding that rules and methods will also deliver this objective).</p>	
<p>Operation of the Land Transport Network</p> <p>The integrated, safe, responsive and sustainable operation of the land transport network, particularly the road network, can be adversely affected by inappropriate design and construction, and connection between the network and adjoining land, as well as through the adverse effects of land use activities and subdivision.</p>	<p>Objective 5: An efficient, effective, integrated, safe, resilient and sustainable land transport network is provided for and protected.</p>	<p>There is a real focus on developing a multi modal transport network in both the RPS and Land Transport Plan. We consider the wording of the proposed objective will address this as well as issues of accessibility and contributing to a strong economy.</p>	<p>Not applicable to Transpower, except in relation to third party transport proposals that may affect existing National Grid infrastructure.</p>

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<p>Urban Expansion</p> <p>New roads on the Hamilton urban fringe may compromise the later future construction of an urban standard and density road network.</p>	<p>Future urban standard and density road network is not compromised by new roads on the Hamilton fringe</p>	<p>This issue could be appropriately addressed in the above land transport objective as a policy, rather than as an objective in its own right.</p> <p>Alternatively, this could also addressed as part of proposed new growth and economy objective (below) which captures cross boundary integration issues and removes the need for an infrastructure specific objective.</p> <p><i>Development around the fringes of Hamilton City and other urban areas does not restrict future urban expansion</i></p> <p>It is recommended this issue/objective is discussed further with HCC given the background.</p>	<p>N/A – assume not being pursued? Unlikely to be relevant to Transpower’s interests in any event.</p>
<p>Recommended issue:</p> <p>Reverse sensitivity of land use with existing infrastructure</p>		<p>There seems to be no issues or objectives that acknowledge that subdivision, land use and development has the potential to have reverse sensitivity effects on infrastructure other than regionally significant infrastructure. Or that inappropriate development can negatively impact the safety of communities e.g. sensitive uses in close proximity to the electricity transmission network (refer Policies 10 and 11 of the NPS on Electricity Transmission). We consider minimising land use conflicts with existing infrastructure to be a key issue and objective.</p> <p>It is not just regionally significant infrastructure</p>	<p>We note reference to the need for a “reverse sensitivity” objective (including Policies 10 and 11 of the NPSET). Transpower proposes the following objective to address this, albeit this would only apply to the National Grid, not all infrastructure:</p> <p>Objective 6: “Manage subdivision, use and development to ensure that the operation, maintenance, upgrading and development of the National Grid is not compromised.”</p>

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		<p>which may need protecting from reverse sensitivity effects of land use and development. We recommend an objective such as:</p> <ul style="list-style-type: none"> • Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects; or • Development maintains and enhances the safe, efficient and effective use of existing infrastructure 	<p>Note: We've used "manage" here to reflect the range of approaches adopted within lower order provisions to protect the National Grid while recognising that there are a number of compatible activities that can take place within close proximity to it. We propose the following policy that provides further direction:</p> <p>Policy "6.1" "Manage the effects of subdivision, development and land use to ensure that the operation, maintenance, upgrading and development of the National Grid is not compromised by:</p> <ul style="list-style-type: none"> (a) Avoiding sensitive activities and intensive land uses establishing within National Grid Yards, and ensuring that these are appropriately managed around substations; (b) Managing the location of development around National Grid transmission lines to ensure that the

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			<p>safety and efficiency of the National Grid is not compromised; and</p> <p>(c) Managing subdivision in the National Grid Corridor to avoid subsequent land use from compromising the operation, maintenance, upgrading and development of the National Grid.”</p> <p>Note that “regionally significant infrastructure” could be stated in place of a National Grid specific objective, provided the definition in the District Plan will mirror the RPS by including the National Grid. Note the use of “avoid” language in relation to sensitive activities and those that have the potential to compromise the National Grid.</p>
			<p>Objective “7”</p> <p>Transpower would seek an objective (and relevant policy wording) that gives effect to Policy 8 of the NPSET, which states: “In rural environments, planning and development of the transmission system should seek</p>

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			<p>to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.”</p> <p>The activity status sought for new National Grid infrastructure in ONLs and the coastal environment is discretionary, to reflect the qualifier in NPSET Policy 8 “<i>seek to avoid</i>”, as opposed to an absolute requirement of “avoid” which would imply a non-complying status. See Policy 12.1 of the RPS. The form of the objective/policy really depends on the approach to the relevant chapter. We would be happy to provide feedback on chapters in due course.</p>

Current Appendix B ‘objectives’	Comments
<p>B2 Wastewater</p> <p>B2.1The wastewater disposal system shall meet these objectives:</p> <ul style="list-style-type: none"> (a) safeguard peoples’ health and safety (b) safeguard people from loss of amenity due to the presence of unpleasant odours or the accumulation of offensive matter resulting from wastewater and foul water disposal (c) safeguard the intrinsic values of ecosystems within the land 	<p>Consider that this objective is not needed in Appendix B or should be renamed so not referred to as an objective given:</p> <ul style="list-style-type: none"> - matters a) – c) are already adequately covered by the following objectives: <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.

Current Appendix B 'objectives'	Comments
<p>being subdivided</p> <p>(d) ensure that sanitary wastewater is removed from the premises.</p>	<ul style="list-style-type: none"> • Land use and development is supported by the appropriate provision of infrastructure. <p>- matter d) would be more appropriate as policy to achieve the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.
<p>B3 Trade Waste Measures shall be put in place to minimise the generation of trade wastes from all commercial premises. A specific trade waste agreement will be required prior to the discharge of any trade wastes to the Council's wastewater networks.</p> <p>B3.1 A trade waste disposal system shall meet these objectives:</p> <p>(a) safeguard people's health and safety, in regard to injury or illness caused by infection or contamination resulting from trade waste</p> <p>(b) safeguard people from loss of amenity due to the presence of unpleasant odours or the accumulation of offensive matter resulting from trade waste disposal</p> <p>(c) safeguard the intrinsic values of ecosystems within the land being subdivided</p> <p>(d) ensure that sanitary and industrial wastewater is removed from premises.</p>	<p>Consider that this objective is not needed in Appendix B or should be renamed so not referred to as an objective given matters a) – c) are already adequately covered by the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety. <p>- matter d) would be more appropriate as policy to achieve the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.
<p>B4 Water B4.1 The water supply system shall meet these objectives:</p> <p>(a) safeguard people from illness caused by infection from contaminated water or food</p> <p>(b) safeguard against injury or property damage arising from the operation of the system</p> <p>(c) safeguard people from loss of amenity arising from a water supply that is offensive in appearance or odour</p>	<p>Consider that this objective is not needed in Appendix B or should be renamed so not referred to as an objective given:</p> <p>- matters a) – c) are already adequately covered by the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.

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<p>(d) provide adequate supply of potable water for the reasonably foreseeable consumption, health and hygiene needs of people using each allotment</p> <p>(e) conserve water by avoiding leaks and, where practicable, the use of water saving fixtures, such as low flow shower heads and rain tanks will be encouraged</p> <p>(f) provide adequate water supply for fire fighting in urban areas.</p> <p>(fa) new buildings shall incorporate water saving fixtures where practicable, such as low flow shower heads and rain tanks.</p>	<p>- matters d) – fa) would be more appropriate as policies to achieve the following objective:</p> <ul style="list-style-type: none"> • Land use and development is supported by the appropriate provision of infrastructure.
<p>B5 Stormwater</p> <p>B5.1 The stormwater disposal system shall meet these objectives:</p> <p>(a) safeguard people from injury or illness from damage caused by surface water</p> <p>(b) avoid adverse effects caused by surface water on other properties</p> <p>(c) protect the environment from accelerated erosion or sedimentation</p> <p>(d) protect the environment from the effects of heavy metals and other contaminants in stormwater discharges</p> <p>(e) protect the outfalls of drainage systems.</p> <p>(ea) provide adequate drainage within each allotment</p>	<p>Consider that this objective is not needed in Appendix B or should be renamed so not referred to as an objective given:</p> <p>- matters a) – c) are already adequately covered by the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety. <p>- matters d) – 3) would be more appropriate as policies to achieve the following objective:</p> <ul style="list-style-type: none"> • Land use and development is supported by the appropriate provision of infrastructure. <p>- matter ea) would be more appropriate as policy to achieve the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.
<p>B7 Road Standards</p> <p>B7.1 Roads shall meet these objectives:</p> <p>(a) ensure safe and efficient movement of people, vehicles and goods, with minimum adverse effects on the environment</p>	<p>Consider that this objective is not needed in Appendix B or should be renamed so not referred to as an objective given matters a) – b) are already adequately covered by the following objective:</p>

Current Appendix B 'objectives'	Comments
<p>(b) provide for network utilities, subject to objective (a).</p>	<ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.
<p>B8 Other Utilities B8.1 Other utilities (e.g. telecommunications, energy) shall meet these objectives:</p> <p>(a) safeguard health and safety (b) provide an adequate supply of the service or commodity to each allotment</p> <p>not conflict with the operation or maintenance of the services mentioned above.</p>	<p>Consider that this objective is not needed in Appendix B or should be renamed so not referred to as an objective given:</p> <p>- matter a) is already adequately covered by the following objective:</p> <ul style="list-style-type: none"> • Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety. <p>- matter b) would be more appropriate as policy to achieve the following objective:</p> <p>Infrastructure is provided in a manner that does not compromise the qualities and characteristics of surrounding environments and community wellbeing and health and safety.</p>