Submission on the Draft Unitary Plan

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Topic:

Electricity Transmission Corridors

Submitter:

Manukau Harbour Restoration Society

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May 21, 2013

1. Introduction

The Manukau Harbour Restoration Society (MHRS) is a community, membership-based incorporated society. It was formed in 2011 by concerned residents from around the Manukau Harbour with the purpose of encouraging restoration of the harbour to the environmental and recreational quality it once had.

MHRS welcomes the opportunity to comment on the draft Unitary Plan for Auckland.

2. Background

Overhead electricity transmission lines cross the Manukau Harbour foreshore, particularly in the Mangere Bridge, Onehunga and Hillsborough areas. These lines and towers detract from the visual appearance of the harbour as well as the use and enjoyment of the bays and foreshore.

Replacing these overhead lines and towers as they end their useful lives with assets underground will improve the appearance, use and enjoyment of the harbour and help restore the harbour to its former recreational and environmental quality. Undergrounding can occur in conjunction with the many infrastructure projects planned for areas adjacent to the harbour.

3. Overview of Submission

MHRS supports in general the rules and definitions in the draft Unitary Plan that pertain to electricity transmission corridors, but submits that to be consistent with NPSET, buffer corridors should only be placed on areas containing sensitive activities. Buffer corridors should only be placed on areas with non-sensitive activities at the time of resource consent application for subdivision or development of sensitive activities.

Objectives and policies, particularly the Regional Policy Statement need to be strengthened to show the intent for these overhead lines to be replaced with assets underground.

4. Detailed Submission

A. <u>Unitary Plan Part 2: Regional Policy Statement</u>
Section 2.1.2 Enabling economic wellbeing:
Physical Infrastructure and Energy

MHRS agrees with the need to improve the security of electricity supply and recommends amending the bullet point under Energy to read as follows:

• Enabling the upgrading, maintenance and operation of new and existing energy supply infrastructure to improve the physical security and resilience of supply, in particular the location of sensitive activities near electricity generation and transmission facilities *and placing current and new transmission assets underground.*

Section 2.3. Enabling economic well-being: 2.3.2 Infrastructure and energy

As with the sections above this section must include objectives and policies addressing the need to place transmission assets, including existing facilities, underground, particularly in transportation corridors.

MHRS recommends the following additions:

Policy 3: Integrate infrastructure with land use development *and transportation investments* by ensuring it is: *e. placed underground whenever possible.*

Policy 6: Require the integration and co-ordination between the council, transport agencies and infrastructure providers on the upgrade, and future development of significant infrastructure, *including undergrounding existing and future transmission facilities.*

Policy 13. Manage the adverse effects on the health and safety of communities and amenity values of existing land uses associated with new and/or major upgrades to *or the operation of* significant infrastructure.

Policy 14. Encourage the co-location and co-siting of infrastructure in existing and new urban areas, and the use of existing infrastructure corridors, subject to operational and technical feasibility, and the replacement of existing above ground transmission facilities with new assets underground in transportation and other utility corridors.

- B. <u>Unitary Plan Part 3: Regional and district plan objectives and policies</u>
 - 3.1 Auckland-wide objectives and policies
 - 3.1.1 Infrastructure
 - 3.1.1.1 Network utilities, energy and transport

The section does not acknowledge the negative impact transmission towers and overhead lines can have on the use and development of private property and public land and commons.

In the Mangere, Onehunga, Hillsborough and Mt Roskill areas, land would be opened for urban development and the Manukau Harbour's appearance and recreational condition improved if these overhead transmission assets were removed and placed underground. This is possible given the multiple transportation and motorway improvements proposed for the area. Auckland Council should be actively working with Transpower to relocate these transmission lines underground, at Transpower's expense, in the rights of way of motorways, rail lines and open space corridors, and this goal should be expressed in the Unitary Plan.

Proposed changes to 3.1.1.1.

Objectives: Add Points 4 and 5

- 4. Negative impacts on the use, development and value of private and public property are minimized when locating and regulating electricity transmission infrastructure.
- 5. Existing overhead electricity transmission infrastructure is replaced with underground infrastructure as transportation and other projects occur across Auckland.

Policies: Undergrounding of infrastructure in urban areas

7. Enable **Promote** the coordinated undergrounding of existing **overhead transmission lines on towers and** electricity and telecommunications lines, in the road reserve **and other transportation corridors and improvements**, particularly where the opportunity exists with the road **and rail** network improvements.

C. <u>Unitary Plan Section 4 Rules and Section 5 Definitions</u>

Thank you for considering our submission.

MHRS supports the rules contained in Section 4.4.1.4 in general but questions the need for buffer corridors for non-sensitive uses as such corridors are not required in NPSET. MHRS requests these corridors be removed for non-sensitive uses and only placed on properties at the time of resource consent for subdivision or development of sensitive uses.

MHRS supports the definition of Sensitive Activities contained in Section 5 as this definition reflects the criteria for sensitive activities in the National Policy Statement on Electricity Transmission 2008.