

Appendix 3: s32AA Assessment

Provision	Effectiveness and efficiency	Costs and benefits	Risk of not acting or acting	Conclusion as to the most appropriate option
Definitions				
Minor Utility Structure	Amendment to definition will provide for small scale electricity equipment (kiosks, transformers and switchgear) as permitted (EI-R15), which is more effective and efficient than requiring resource consent.	No cost. Benefit in reduced regulation with respect to small-scale electricity equipment.	Risk of not acting is a consenting requirement for small-scale electricity equipment incommensurate with the anticipated environmental effects of such equipment.	The recommended amendment at paragraph 3.5
Earthworks in the National Grid Yard	Refer to the evaluation associated with the proposed new earthworks rule.			
Network Utility	Amendment to also reference owners and operators of a generator connected to distribution or transmission lines to enable the Trustpower Coleridge HEPS to be covered by network utility references (as not technically a network utility) rather than needing to insert additional wording into the PDP. An efficient approach using existing defined terms rather than inserting additional wording.	No cost. Will provide greater clarity to Trustpower that the Coleridge HEPS is addressed in the provisions.	Risk of not acting is a gap in the provisions and a lack of clarity for Transpower.	The recommended amendment at paragraph 3.8
Objectives and Policies				

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EI-O3 EI-P6	Reference to 'reverse sensitivity effects' in addition to 'incompatible activities will achieve integration and consistency with SD-DI-02.	No cost. Will provide greater clarity and consistency.	Risk of not acting is inconsistency and a lack of clarity.	The recommended amendment at paragraphs 3.11 and 3.24.
EI-P1	A recommended new clause seeks to fill a current gap in terms of recognising the benefits of new important infrastructure and the amendment to reference 'minor upgrading' is considered to reflect the enabling rule framework related to minor upgrading of existing infrastructure (i.e. EI-R11).	No cost. Benefit of addressing a gap in the current policy with respect to providing for new important infrastructure, in addition to enabling the operation and maintenance of existing infrastructure and minor upgrading.	Risk of not acting is that a gap in the policy will remain and there will be a lack of clarity about the distinction between new and existing important infrastructure.	The recommended amendment at paragraphs 3.14.
EI-P2	Acknowledges the functional or operational needs of important infrastructure, including practical constraints. Better recognises these constraints and the need for them to be considered when assessing infrastructure proposals. Encourages substantial infrastructure upgrades to reduce existing adverse	No cost. Provides greater clarity and consistency with strategic objectives.	Risk of not acting is inconsistency and a lack of clarity.	The recommended amendment at paragraphs 3.17.

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	effects but balances that with consideration of the impact on the efficiency, effectiveness or resilience of the infrastructure.			
EI-P4	Recognises that aside from standards and regulations that a Construction Noise Management Plan may be another method of managing effects.	No costs. Benefit of better integration with the rules and greater clarity.	Disconnect between the policy and rules.	The recommended amendment at paragraph 3.21.
EI-R2	The rule provides for network utilities, structures not used for habitation and agricultural and horticultural activity (with some exceptions) so long as access to the National Grid is maintained and the NZECP is complied with, which is considered an effective and efficient approach to recognise that some activities can be undertaken in proximity to the National Grid without compromising its safe and efficient operation, which is preferable to a corridor which allows no development.	<p>No cost. Benefit of permitting some activities within the National Grid Yard, including agricultural and horticultural production activities (with some exceptions).</p> <p>Produce packing activity is recommended to continue to require consent, but the incidences of such activity seeking to establish within the National Grid Yard are anticipated to be low and the risks identified by Transpower are considered to outweigh the benefits of no regulation (i.e. no</p>	<p>Risk of not acting is a lack of consistency with the National Planning Standards (rule requirement to be within the rule) and a lack of clarity.</p> <p>Risk of not acting on Hort NZ's request for produce packing is increased regulation for land owners; however, when balanced with the risks identified by Transpower this risk is considered low.</p>	The recommended amendment at paragraph 3.27

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	It is also recommended to incorporate EI-REQ2 concerning structure setbacks in the rule itself to conform with the National Planning Standards format given this is the only rule relevant to EI-REQ2.	consenting costs) of this activity.		
EI-R3	Minor amendment to ensure the setbacks apply to the centreline and/or the foundation of a support structure.	No cost. Will provide greater clarity.	Risk of not acting is a lack of clarity about where the measurement applies from.	The recommended amendment at paragraph 3.31.
EI-R4	<p>The recommended amendment to the rule lessens the setback for conductive fences from 6m to 5m from any SEDL with no distinction between the types of SEDL's and setbacks (guided by NZECP). This is considered a simpler approach.</p> <p>Further recommendations are to provide a 10m setback from the Islington to Springston SEDL but as this is akin to a National Grid facility to allow the</p>	The benefit is continuing to allow some form of development within the Islington to Springston SEDL corridor which will not adversely impact on the operation and maintenance of this corridor (consistent with the National Grid provisions), but making a distinction between the other SEDL's which require a 5m clear corridor for operation and maintenance of the lines due to the differences compared to the National Grid (i.e., lower	Risk of not acting is that there is no distinction made between the lines in the provisions and a risk to Orion's other SEDL's operation and maintenance.	The recommended amendment at paragraph 3.35.

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	<p>same exceptions as the equivalent National Grid Yard rule (i.e., network utilities, structure not used for habitation etc,); and to apply a blanket 5m setback from other SEDL's with no exceptions for structures within the corridor.</p> <p>This is considered effective and efficient as consistency is achieved with the National Grid rule (EI-R2), but only where the National Grid and SEDL's are comparable (i.e., the Islington to Springston SEDL)</p>	<p>lines and greater access constraints).</p> <p>The costs with respect to land development opportunity are anticipated to be low as zone setbacks are required which will in many instances overlap with this requirement.</p>		
EI-R8	<p>The recommended amendment to include a new controlled activity rule for new and temporary customer connections to a heritage item will be an effective and efficient means of clearly providing for these connections aligned with other plan rules which the current rule</p>	<p>The benefit is a clearer consenting pathway and changing the activity status from restricted discretionary to controlled consistent with the outcome of Chorus's consultation with Heritage NZ and provisions in other District Plans.</p>	<p>Restricted discretionary consent would be required, which while not overly onerous, is inconsistent with other similar District Plan provisions for these relatively minor works, and a lack of clarity for Chorus.</p>	<p>The recommended amendment at paragraph 3.39.</p>

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	does not (defaults to restricted discretionary).			
EI-R13	Small cell units are minor in scale and are generally added to the existing network by attaching to poles or buildings. Disapplying the structures in special areas, reflectivity and height rule requirements is effective and efficient as such considerations are not critical to minor add-ons to the network.	The benefit is less regulation for small-scale elements of the telecommunications network. No costs are anticipated as the establishment of the telecommunications facility itself would still require assessment.	Resource consent would potentially be required for these small-scale additions to the network, incommensurate with their anticipated effects.	The recommended amendment at paragraph 3.45.
EI-R15	Kiosks, transformers and switch gear are comparable in scale to electricity cabinets and the recommended amendments enable this equipment.	No costs. Benefits include no consent requirement for these structures as long as they meet the specified height and area and consistency with neighbouring plan provisions (i.e., Christchurch District Plan). Also provides greater clarity for Orion.	Resource consent would be required for kiosks, transformers etc., incommensurate with their anticipated effects.	The recommended amendment at paragraph 3.48.
EI-R16	Enables back up electricity equipment to operate longer than 48 hours where the daytime noise limits are met, and for equipment to	Could be noise effects for land owners, however offset by the fact that the generator is providing power which would not otherwise	Back-up electricity suppliers are not able to comply and would need resource consent which is not practical or feasible in most situations.	The recommended amendment at paragraph 3.51.

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	operate for emergency purposes for a maximum of 12 months with no distinction as to whether it is the primary supply or not.	be available and that at least the daytime noise limits need to be met which provides a certain level of amenity protection (night time noise levels are unable to be met at least with respect to Orion's equipment in any case).		
EI-R19	The provisions as notified are not representative of the heights needed for overhead lines and are excessive.	Benefit of ensuring height is limited to that which is actually required by the line's operators.	Potentially over height structures which compromise the landscape visually; precedence effect; misalignment with other district plans.	The recommended amendment at paragraph 3.54.
EI-R22	Deletion of NH-REQ5 is effective as natural hazards are not anticipated to be an issue with respect to environmental monitoring equipment.	No costs.	Unnecessary regulation.	The recommended amendment at paragraph 3.57.
EI-R29	Recognises that official signs and signs necessary for safe and efficient operation of Coleridge HEPS may be required, but that not all signage should be permitted.	No costs. Benefit of permitting necessary signage only which can be readily visually accommodated at the Coleridge HEPS site given the rural location.	Undue restrictions on official signs and necessary signage which would require a resource consent.	The recommended amendment at paragraph 3.60.
EI-RX Network Utilities near	Effective in permitting network utilities within 10m of an SEDL, so long as access	Benefits include permitting network utilities so long as the NZECP is complied with.	Lack of clarity for network utilities and the need for consent can be avoided.	The recommended amendment at paragraph 3.64.

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Significant Electricity Distribution Lines	is not compromised and NZECP is met.	Costs to Orion are considered to be countered by enabling water storage so long as access is maintained. Benefit of maximising land development within the corridor.		
EI-RX Earthworks in the National Grid Yard	Effective in translating complicated NZECP provisions into a rule which can be more readily understood, and ensures earthworks do not compromise the National Grid.	No costs. Benefit of providing greater clarity to reflect the requirements of the NZECP, and consistency with other plans.	Lack of clarity and costs to the National Grid network.	The recommended amendment at paragraph 3.68.
EI-REQ2	The proposed structure is a requirement of National Planning Standards	No costs. Benefit of providing greater clarity to reflect the requirements of the NZECP.	Lack of clarity and a plan structure inconsistent with the National Planning Standards.	The recommended amendment at paragraph 3.71.
EI-REQ14	Effective in not applying reflectivity to telecommunications lines where such a provision is not practical, and does not place regulatory burden on telecommunication providers but still ensures that structures are appropriate within the rural landscape.	No costs. Benefit of removing consenting requirements for telecommunication providers but still ensures reflectivity is a consideration.	Risk of not acting is to place regulatory burden on telecommunications providers in some instances.	The recommended amendment at paragraph 3.74.