

## Proposed National Policy Statement on Electricity Transmission

Submission to the Board of Inquiry on the Proposed National Policy Statement on Electricity Transmission  
25 June 2007

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### Background to IPENZ

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. It has approximately 10,000 Members, including a cross-section from engineering students to practising engineers to senior Members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest giving a learned view on important issues, independent of any commercial interest.

### Executive Summary

As outlined in our discussion document *Engineering a National Energy Strategy* (June 2006) and our submission on *The Merits and Potential Scope of National Guidance on the Management of Electricity Transmission under the RMA* (February 2006), IPENZ recognises the need for national direction toward the sustainable management of the electricity transmission network. IPENZ holds the view that electricity transmission is best dealt with by a succinct National Policy Statement (NPS) that outlines the objectives to be addressed by local decision makers, and National Environmental Standards (NES) that set out minimum standards with which local authorities must comply. As such, IPENZ supports the development of the proposed NPS and understands that an NES is currently being evaluated.

While we are not currently in a position to provide a more detailed response on the specifics of the proposed NPS, we support the submission put forward by the Electricity Engineers' Association of New Zealand Incorporated.

### Submission

IPENZ considers that the NPS should express the importance of timely investment in the transmission system (hence the need for an expedited process) and it should consider the possible effects on the national generation market. The NPS should give direction to local decision makers, and consequently achieve national consistency under the RMA. The standards should also allow decisions to be anticipated by planners and developers.

#### **Objective**

IPENZ strongly supports the intention to raise the status of electricity transmission to one of national significance when considering resource management proposals.

### **Policy 1 & 2**

IPENZ agrees with the benefits as set out in Policy 1 and the intention of Policy 2, which we consider will assist high-quality and timely decision making.

### **Policy 3**

IPENZ notes in the evaluation report that it is considered that this policy would result in relatively low benefits due to existing policy addressing the adverse effects of activities. However, IPENZ considers that it is still appropriate and important to include such a statement, and considers that the NPS should be a clear and concise document in order to be a useful and practical resource for local decision makers.

### **Policy 4**

IPENZ supports the intention of Policy 4 but considers that more clarity for local authorities – and consequently for planners and developers – would be beneficial.

### **Policy 6**

IPENZ considers that this issue might be more appropriately addressed by an NES. As stated in the Resource Management Act 1991, the purpose of an NPS is to state objectives and policies for matters of national significance. In contrast, an NES is described as “a regulation that prescribes technical standards, methods, or requirements in relation to the control of land, the coastal marine area, the beds of rivers and lakes, discharges to water or air and noise.”

## **Conclusion**

In general, we support the proposed NPS and consider that this should be implemented in conjunction with an NES. We consider that this will promote high-quality and timely decision making, thereby helping to ensure security of supply for our economy and national well-being. We also believe that providing more certainty for investors will create a market environment conducive to responsible long-term investment.

IPENZ does not seek to speak to this submission but is happy to do so if required.