

AUCKLAND UNITARY PLAN
INDEPENDENT HEARINGS PANEL

Te Paepae Kaiwawao Motuhake o te Mahere Kotahitanga o Tāmaki Makaurau

Report to Auckland Council
Hearing topic 074 Designations

Transpower Limited

Designations 8507, 8515, 8516, 8517 and
8519

Underground Line and Transition Facilities

May 2016

Report first prepared by Harry Bhana in accordance with the Auckland Unitary Plan Independent Hearing Panel procedure and in accordance with section 142 of the Local Government (Auckland Transitional Provisions) Act 2010, on 26 August 2015 updated without amendment 5 October 2015. Further updated on 24 March 2016.

Adopted as Auckland Unitary Plan Independent Hearings Panel recommendations in accordance with the Auckland Unitary Plan Independent Hearing Panel procedure and in accordance with section 144 of the Local Government (Auckland Transitional Provisions) Act 2010 on date of signature.

Contents

1.	Introduction	3
2.	Assessment	3
3.	Expert input.....	3
4.	Estimate of mediation required.....	4
5.	Estimate of hearing requirements, and matters subsequently addressed at the hearing	4
6.	Recommendation to Panel	5
7.	Panel recommendations to Auckland Council	5
8.	Panel reasons	5
9.	Assessment of modifications and submissions.....	6
10.	Attachment 1 Changes to text of Proposed Auckland Unitary Plan	16
11.	Attachment 2 changes to maps in the Proposed Auckland Unitary Plan.....	23
12.	Expert information	23

1. Introduction

The purpose of this report is to provide an assessment and recommendation in relation to designations, modifications and new designations classified by the Independent Hearings Panel as moderately complex. This classification will generally apply where there is a:

- i. rollover of a designation with no modifications and a submission lodged by third party;
- ii. modification to a designation that will result in more than minor effects and with or without submissions;
- iii. notice of requirement for a new designation for existing works with or without submissions.

2. Assessment

The assessment will address:

- i. effects on the environment of allowing the modification or requirement;
- ii. mitigation measures proposed by requiring authority including any proposed conditions;
- iii. other section 171 matters or section 168A(3) (if the requiring authority is Auckland Council) matters where relevant;
- iv. whether land is owned by the requiring authority.

See section 9 of this report for the assessment of each modification and requirement.

On the basis of the assessment, the report concludes that Designations 8507, 8515, 8516, 8517 and 8519 should be recommended for confirmation subject to the modifications set out in Attachment 1.

3. Expert input

To support appropriate assessment, expert advice has been obtained for this report on the following matters:

Matter/issue	Advice obtained
Insertion of new technical conditions dealing with construction and maintenance noise, vibration, oil spill, and electromagnetic field exposure, and the use of substation earth grids. I requested Transpower to provide technical/expert advice to support the proposed conditions.	On 13 August 2015, the requiring authority provided the requested technical expert advice which supported the proposed conditions and also suggested some further amendments. In accordance with directions of the Panel I assessed these further amendments and recommended further changes to the affected designations as discussed below.

See section 12 for expert technical advice.

4. Estimate of mediation required

As I have noted in section 9 there are matters which remain unresolved between third-party submitters and the requiring authority. I am satisfied that none of these matters would benefit from further mediation.

5. Estimate of hearing requirements, and matters subsequently addressed at the hearing

Estimate

Based on the responses of the requiring authorities as detailed in section 9, the following matters have been identified to progress to a hearing.

- i. B S, S B and C E Liggett. The submitters requested that the mapped extent of Designation 8507 be reduced. Transpower has advised the submitters that it will carry out a review of the mapped extent of the designation in consultation with the Council, in accordance with the requirements of Condition 34 of the designation in due course. It is not evident from Transpower's response whether the Liggetts will wish to pursue the matter to a hearing.
- ii. 3424-33 M W Norton, 3738-86 Manukau Harbour Restoration Society, 4442-29 The Onehunga Enhancement Society, 4460-17 Jackson Electrical Industries Ltd, and 4484-23 Selwyn Street Properties Ltd seeking that Transpower Designation 8503 be amended to require notification to local boards and owners of property prior to making changes to overhead lines or towers and requiring Transpower to work with the Council and other organisations to place power lines underground. The other designations reported on here were also subject to a "blanket" submission by each of these submitters requesting the same amendment in respect of all Transpower designations. Transpower advises that it considers the relief sought inappropriate and unnecessary and it is attempting to resolve these issues prior to the hearing.

If these matters are not resolved, it is estimated that approximately 1 hour of hearing will be required.

Matters addressed at the hearing

Transpower gave evidence on the above matters and those parties identified above did not appear.

6. Recommendation to Panel

That the Panel:

- i. agrees to hear matters identified in section 5 above and subject to its determination of the matters at issue,
- ii. recommends that notices of requirement for existing designations included in the Proposed Auckland Unitary Plan as Designations 8507, 8515, 8516, 8517 and 8519 be confirmed subject to the modifications set out in Attachment 1 and Attachment 2.

Author	Harry Bhana
Author's Signature	
Date	20 August 2015 updated without amendment 5 October 2015. Further amended 23 March 2016 to incorporate recommendations on Transpower proposed minor amendments that were not included in submissions.

7. Panel recommendations to Auckland Council

Notices of requirement for existing designations included in the Proposed Auckland Unitary Plan with or without modification on which submissions have been lodged; and where issues have been resolved, by mediation, direct discussions, the evidence exchange process, or where submissions were not pursued, or left unrepresented by evidence at the hearing.

The Panel recommends to Auckland Council that it recommends that the notices of requirement 8507, 8515, 8516, 8517 and 8519 be confirmed subject to the further modifications included in Attachment 1 and Attachment 2.

8. Panel reasons

The reasons for the Panel's recommendation are set out in section 9 below.

Panel Chair	David Kirkpatrick
Chair's Signature	
Date	18 May 2016

9. Assessment of modifications and submissions

Requiring authority	Transpower Limited
Designation number (s)	8507, 8515, 8516, 8517, 8519
Designation purpose	Electricity Transmission – Underground Lines and Transition Facilities/Works.
Location	<p>8507 - The construction, operation and maintenance of underground transmission lines ...19 Gavin Street to 109 Golfland Drive, Pakuranga.</p> <p>8515 - The construction, operation and maintenance of a transition station to connect the underground cable and overhead lines ..16 Umbria Lane (near Brownhill Road), Whitford.</p> <p>8516 - The construction, operation and maintenance of a double circuit underground 220kV cable ..143 Brownhill Road, Whitford to 109 Golfland Drive, Howick.</p> <p>8517 - The construction, operation and maintenance of a double-circuit underground 220kV cable, 143 Brownhill Road, Whitford to 26-28 Kaitawa Street, Otara.</p> <p>8519 - The installation, maintenance, repair, replacement, inspection and operation of two 220kV underground electricity transmission lines ..410 Albany Highway to State Highway 1 (Constellation Drive), Rosedale.</p>
Designations given effect to	All have been given effect to.
Lapse date in operative plan	NA
Rollover designation with no modifications	8507, 8515, 8516, 8517.
Description of the modification	<p>Modifications to 8519</p> <p>Delete Condition 4 which relates to the lapse period which is irrelevant because the designations have been given effect to.</p>
Assessment of modifications	<p>Effects of modification of conditions</p> <p>The deletion of the lapse condition in Designation 8519 is of no relevance because the works have been given effect to.</p>
Notice of requirement	NA
Land ownership	No
Land owned by the requiring authority	All land subject to designations is owned by the requiring authority.
Submitter	<p>8507</p> <p>3766- 469 to 3766-485 by Transpower Ltd.</p> <p>6289-9 BS SB and CE Liggett</p>

	<p>3424 M W Norton, 3738 Manukau Harbour Restoration Society, 4442 The Onehunga Enhancement Society, 4460 Jackson Electrical Industries Ltd, and 4484-23 Selwyn Street Properties Ltd.</p> <p>8515 3766-557 to 3766-568 by Transpower Ltd.</p> <p>8516 3766-569 to 3766-581 by Transpower Ltd.</p> <p>8517 3766-582 to 3766-589 & 3766-750 by Transpower Ltd. 2410-6 by Lai Yip and Huichan Pan.</p> <p>8519 3766-600 to 3766-608 & 3766-750 by Transpower Ltd. 5716-2762 by Auckland Council.</p>
Matters addressed in submission	<p>Submissions to 8507, 8515, 8516, 8517, 8519.</p> <ul style="list-style-type: none"> i. The requiring authority seeks changes to the heading to the designations so they are consistent with the Schedule preceding the individual designations and changing the heading "Purpose" to "Description/Activity" with minor additions to clarify the nature of the activity or its location. ii. 3424 M W Norton, 3738 Manukau Harbour Restoration Society, 4442 The Onehunga Enhancement Society, 4460 Jackson Electrical Industries Ltd, and 4484 Selwyn Street Properties Ltd seeking that the designations be amended to require notification to local boards and owners of property prior to making changes to overhead lines or towers and requiring Transpower to work with the Council and other organisations to place power lines underground. <p>Submissions to 8507, by the requiring authority</p> <ul style="list-style-type: none"> i. Delete Condition 1 which sets out definitions of the terms 'Council' and 'Works' for the purpose of the conditions. ii. Delete Conditions 3 - 6, which relate to the preparation of a Construction Management Plan, Construction Noise and Vibration Management Plan, Communications Plan and Site Specific Transport Management Plan. iii. Delete Conditions 7 - 12 [refer submission, page 245 - 246/336], which relate to construction noise and vibration and replace with the following two conditions: "<u>[X] Subject to condition [Y], all construction and maintenance work shall be designed, managed and conducted to ensure that</u>

	<p><u>construction and maintenance noise from the site does not exceed the limits in NZS6803:1999</u> <u>Acoustics—Construction Noise at locations set out in section 6.2 of that standard.</u> [Y]<u>The noise limits shall not apply to emergency work required to re-establish continuity of supply, work urgently required to prevent loss of life or other personal injury, or commissioning works, but all practicable steps shall be undertaken to control noise and to avoid adverse noise effects, particularly at times when the stricter noise limits apply (e.g. at night time).</u>”</p> <ul style="list-style-type: none"> iv. Delete Conditions 13 to 23 (that refer to the “Community Information and Liaison”, a “Code of Practice for Working in the Road, “Construction Hours”, the “Roading and Traffic Management Plan(s)” and “Tree Management”. v. Amend Condition 26 to read: “<u>Archaeology and Cultural</u> <u>Cultural/Spiritual</u> 26. If any urupa, traditional sites, taonga (significant artefacts) and/or koiwi (human remains) are <u>discovered exposed</u> during the <u>site w\W-works</u>, the following procedures shall apply: a. Works in the immediate vicinity of the site that has been <u>exposed shall cease</u> <u>discovered shall be suspended pending completion of the steps at (b) to (d) ;...</u>” vi. Delete Conditions 27 - 33 that refer to 'Existing Utilities' and 'Outline Plans'. vii. Retain Condition 34 relating to 'Designation Review'. viii. Amend Condition 35 to read: “Magnetic Fields <u>The Any new w\W-works or equipment</u> shall be designed and constructed to limit the <u>EMF magnetic field exposure to the reference levels International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4): 494–522) (Health Physics 97(3):257-259; 2009) (ICNIRP Guidelines) public exposure of 100μT for magnetic flux density when measured at 1 metre above ground level directly above any cable under normal operating conditions. and 200 μT for magnetic flux density when measured at 1 metre above ground level directly above any cable under normal operating conditions.”</u> ix. Amend Condition 36 to read: “<u>The Works shall be designed and constructed to comply with regulations 58, 60, 69 and 87 of the Electricity Regulations 1997 Any new works or equipment shall be designed and constructed to comply with the Electricity Safety Regulations 2010.</u>” Alternatively, delete Condition 36.
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| | <ul style="list-style-type: none"> x. Amend Condition 37 to read: “<u>The Any new works or equipment</u> shall be designed and constructed so as not to cause existing assets of other utilities to be non-compliant with AS/NZS 4853:2000 2012 Electrical Hazard on Metallic Pipelines.” xi. Delete advice notes 1 and 3, which apply during construction in relation to Road Opening Notices and affected utility operators. xii. Add an advice note to read: “<u>Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.</u>” xiii. Include a map of the designation. |
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- Submissions to 8515 by the requiring authority**
- i. Delete Conditions 1 and 2 that refer generally to construction specifications.
 - ii. Amend Condition 4 to read: “The Any works or equipment shall be designed and constructed to limit the EMF at or beyond the secure boundary of the substation site to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4): 494–522) (Health Physics 97(3):257-259; 2009) (ICNIRP Guidelines) public reference levels of 5 kV/m for electric fields and 400 200 µT for magnetic flux density at one metre above ground level under maximum normal operating conditions (ie, when there are no faults in the transmission system).”
 - iii. Amend Condition 6 to read: “The Works shall be designed and constructed to comply with regulations 58, 60, 69 and 87 of the Electricity Regulations 1997 Any new works or equipment shall be designed and constructed to comply with the Electricity Safety Regulations 2010.” Alternatively, delete condition 6.
 - iv. Amend Condition 8 to read: “Any All exterior lighting shall be designed to comply with Transpower's Requirements for Outdoor Switchyard Lighting Policy, TP GS 41.01, Issue 3, April 2006; guidelines and information for switchyard and grounds lighting TP.DS 40.03, issue 1, 2012.”
 - v. Amend Condition 11 to read: “Sound levels shall be measured and assessed in accordance with NZS6801:1999 Measurement of Sound NZS 6801:2008 Acoustics - Measurement of environmental sound and NZS6802:1991 Assessment of Environmental

	<p><u>Sound NZS6802:2008 Acoustics - Assessment of Environmental Sound.</u>"</p> <p>vi. Amend Condition 13 to read: "Any new part of the facility containing oil shall be designed to comply with Transpower's Oil Spill Management Policy (TPG:GS.54.01), <u>Issue 2, June 2002. Issue 3, December 2011.</u>"</p> <p>vii. Amend Condition 21 to read: "Prior to any significant construction work taking place, including any <u>associated significant</u> earthworks, a noise management plan shall be prepared... and the works shall be undertaken in accordance with that noise management plan."</p> <p>viii. Add an advice note to read: "<u>Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.</u>"</p>
Submissions to 8516 by the requiring authority	
	<p>i. Delete Condition 1 that refers generally to construction specifications.</p> <p>ii. Amend Condition 3 to read: "<u>The Any</u> works or equipment shall be designed and constructed to limit the EMF at or beyond the secure boundary of the substation site to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz) (<u>Health Physics, 1998, 74(4): 494-522</u>) (<u>Health Physics 97(3):257-259; 2009</u>) (ICNIRP Guidelines) public reference levels of 5 kV/m for electric fields and 400 <u>200</u> µT for magnetic flux density at one metre above ground level under maximum normal operating conditions (ie, when there are no faults in the transmission system)."</p> <p>iii. Amend Condition 6 to read: "<u>The Works shall be designed and constructed to comply with regulations 58, 60, 69 and 87 of the Electricity Regulations 1997 Any new works or equipment shall be designed and constructed to comply with the Electricity Safety Regulations 2010.</u>" Alternatively, delete condition 6</p> <p>iv. Amend Condition 37 to read: "<u>The Any new W-works or equipment</u> shall be designed and constructed so as not to cause existing assets of other utilities to be non-compliant with AS/NZS 4853:2000 2012 Electrical Hazard on Metallic Pipelines."</p> <p>v. Delete Conditions 8 and 9 that refer to liaison with existing utilities during the design and construction.</p> <p>vi. Delete Conditions 10 to 12 that relate to the</p>

	<p>submission and approval of a Construction Management Plan and construction hours.</p> <p>vii. Delete Condition 17 that relates to vibration during construction.</p> <p>viii. Delete Condition 18 that relates to “Traffic/Roading”, “Continuation of Access”, “Parking”, “Remediation of Property, Roads and Footpaths”, “Sandstone/Caldwells Road Intersection Sight Line Protection”, “Brownhill Road Upgrade”, and “Road widening of Whitford Park Road.”</p> <p>ix. Add an advice note to read: <u>“Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.”</u></p> <p>x. Delete maps in the Attachments and replace.</p>
	<p>Submissions to 8517 by the requiring authority</p> <ul style="list-style-type: none"> i. Amend Condition 3 to update the reference to Radiation Protection Guidelines. ii. Amend Condition 6 to read: <u>“In designing and constructing any new works or equipment, Transpower shall give consideration to third-party conductive services to ensure compliance with regulations 58, 60, 69 and 87 of the Electricity Regulations 1997 as in force at the date of confirmation of the designation. Any new works or equipment shall be designed and constructed to comply with the Electricity Safety Regulations 2010.”</u> Alternatively, delete Condition 4. iii. Amend Condition 37 to read: <u>“The Any new works or equipment shall be designed and constructed so as not to cause existing assets of other utilities to be non-compliant with AS/NZS 4853:2000 2012 Electrical Hazard on Metallic Pipelines.”</u> iv. Add an advice note to read: <u>“Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.”</u> v. Delete the maps in the Attachment and replace with a single line map. <p>Submissions to 8519 by the requiring authority</p> <ul style="list-style-type: none"> i. Delete Conditions 1 to 3 that relate to construction specifications ii. Amend Condition 4 to update the reference to Radiation Protection Guidelines. iii. Delete Conditions 5 to 28 that relate to preparation of an outline plan of works and construction conditions [refer submission, pages 281 - 282/336]

	<p>and replace with the following conditions:</p> <p><u>"Construction and Maintenance Noise (x) All construction and maintenance work shall be designed, managed and conducted to ensure that construction and maintenance noise from the designated area does not exceed the limits in NZS6803:1999 Acoustics– Construction Noise at locations set out in section 6.2 of that standard. (y) The noise limits required by condition x shall not apply to emergency work required to re-establish continuity of supply, urgently required to prevent loss of life or other personal injury or commissioning works, but all practicable steps shall be undertaken to control noise and to avoid adverse noise effects particularly at times when the stricter noise limits apply (eg, at night time)."</u></p> <ul style="list-style-type: none"> iv. Delete Condition 31 that relates to uncovering archaeological remains and replace with a condition that specifies the procedures that apply should any urupa, traditional sites, taonga (significant artefacts) or koiwi (human remains) be exposed during site works. v. Delete Condition 33 that relates to reinstatement at the completion of construction. vi. Add an advice note that reads: <u>"Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan."</u> vii. Amend the Attachments - Schedule of Legal Descriptions to correct the existing title reference (if required) to match the actual boundary. viii. Include a map of the designation in the Attachment. <p>Submission to designation 8519 by Auckland Council</p> <ul style="list-style-type: none"> i. Amend maps to show Designation 8519, as per the legacy maps provided and the schedule of legal descriptions included in the designation text attachments.
Engagement by requiring authority with submitters.	<p>Transpower has advised that it has had discussions with the submitters listed above.</p> <p>Lai Yip and Huichan Pan - Transpower advised that it supports the proposed change to Map 29 of Designation 8517 sought by the submitter and has advised the submitter accordingly.</p> <p>B S, S B and C E Liggett. The submitters requested that the mapped extent of Designation 8507 be reduced. Transpower advises that the designation conditions require a review of the mapped area, in consultation with the Council, and advises that this review will proceed in due</p>

	<p>course. Transpower does not support the reduction of the designation at this time outside of the process required by the designation conditions.</p> <p>In regard to Mark Norton, The Manukau Harbour Restoration Society, The Onehunga Enhancement Society, Jackson Electrical Industries Ltd and Selwyn Street Properties Ltd Transpower has advised that its position is that the relief sought is inappropriate and unnecessary and beyond the scope of Transpower's existing designations. The requiring authority has advised that it will continue to engage with the submitters in an attempt to resolve the issues prior to the hearing.</p>
Assessment and reasons	<p>Assessment of submissions by the requiring authority seeking amendments to Headings and insertion of term Description/Activity</p> <p>I do not consider that the amendments to the heading of the individual designations and to the heading "Purpose" will add any significant clarification and will introduce an inconsistent approach to the style of heading used throughout the designation section of the Proposed Auckland Unitary Plan. Accordingly I do not recommend that the changes sought in those submissions by the requiring authority be confirmed.</p> <p>Assessment of submissions by the requiring authority seeking amendments to conditions</p> <p>I am satisfied that all of the amendments to the conditions that the requiring authority has requested through its submissions are of a minor nature and include both updating of operational conditions and removal of conditions relating to construction which are no longer relevant. I recommend that these amendments be confirmed.</p> <p>Assessment of submissions by the requiring authority seeking the addition of maps to be added to each designation.</p> <p>I have given consideration to the request that Transpower has made in respect of all of its designations. I consider that while the addition of maps will to some extent duplicate the mapping of the designations in the Unitary Plan map system, it will have benefits particularly in regard to more clearly indicating the location of lines and tunnels. I particularly note that the Proposed Auckland Unitary Plan currently contains a very large number of construction-related plans that are no longer of relevance and simply add to confusion when the extent and effects of the designation of an existing work is being considered. I recommend that the requiring authority's submissions seeking the addition of new plans for each designation and the deletion of existing construction-related maps be recommended for confirmation. This recommendation is subject to the requiring authority providing copies of</p>

	<p>marked up amendments to designation plan attachments to the Panel's satisfaction.</p> <p>Assessment of Submissions by Transpower and the Council seeking amendment to Attachment-Schedule of legal descriptions of affected land.</p> <p>This is not a matter that requires assessment. The Council and the requiring authority need to provide an agreed corrected schedule for inclusion in the relevant designations.</p> <p>Assessment of third-party submissions</p> <ul style="list-style-type: none"> i. Lai Yip and Huichan Pan. Transpower advised that it supports the proposed change to Map 29 of Designation 8517 sought by the submitter and has advised the submitter accordingly. No further assessment is required for this report. This is subject to the requiring authority providing copies of marked up amendments to designation maps to the Panel's satisfaction. ii. B S, S B and C E Liggett. The submitters requested that the mapped extent of Designation 8507 be reduced. Condition 34 of the designation requires that the requiring authority in consultation with the Council review and (in broad terms) amend the extent of the designation and remove areas no longer necessary for protection of the works. Transpower has not sought to modify Condition 34 through the rollover and has submitted requesting retention of that Condition. Transpower has advised it intends to carry out the review required by Condition 34 and in my view it would be more appropriate if the submitters' concerns were addressed within a more comprehensive review process addressing all of the area which might no longer be necessary to be contained within the designation. iii. Submitters M W Norton, Manukau Harbour Restoration Society, The Onehunga Enhancement Society, Jackson Electrical Industries Ltd, and Selwyn Street Properties Ltd are concerned about potential effects arising from changes to transmission lines and towers and request that any such changes be publicly notified. I am of the view that the modifications to the conditions do not change the potential for effects arising from changes to transmission lines and towers authorised by the designation. The effects of the proposed modifications to conditions to include a standard set of conditions dealing with matters such as construction noise, and electromagnetic fields radio frequency, light spill and operational noise will provide additional mitigation of any potential adverse effects arising from the activities already
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	<p>authorised by the designation.</p> <p>Effects on adjacent properties and on wider environment</p> <p>For the reasons set out above I do not consider that there are any adverse effects on adjacent properties and on the wider environment that are more than minor and indeed any adverse effects from activities already authorised by the designation will be additionally mitigated by the proposed conditions.</p>
Recommendation to Panel	<p>That the Panel recommends that the notices of requirement for existing designations included in the Proposed Auckland Unitary Plan as Designations 8507, 8515, 8516, 8517 and 8519 be confirmed subject to the modifications set out in Attachment 1 and Attachment 2.</p>
Response from requiring authority	<p>Agrees with the above recommendations to Panel.</p> <p>Wishes to be heard on the following matters:</p> <p>If submissions by third party submitters discussed above cannot be resolved and those parties advise the Panel that they require a hearing.</p> <p>Mediation requested on the following matters:</p> <p>Not required</p>
Report writer's further amendments to recommendation.	<p>The report writer has been advised by Ms Rebecca Eng of Transpower that it was not possible to provide the maps referred to in "Assessment of submissions by the requiring authority seeking the addition of maps to be added to each designation" within the time needed to complete the confirmation of the Panel's recommendations and for that reason that part of the Transpower submission would be withdrawn. Attachment 1 has been amended accordingly.</p>
Further minor amendments sought by Transpower not included in any submissions	<p>At the pre-hearing meeting for Topic 074 Designations on 16 September 2015 Transpower referred to a list of further amendments that were proposed in order to update technical information and prescriptions to conditions attached to its designations. These amendments were not included in any submissions lodged by the requiring authority or any other party. These amendments were considered by the requiring authority to be of a minor nature and unlikely to have more than minor adverse effect on the environment or on other persons or properties.</p> <p>In accordance with the Panel's direction at that meeting a set of documents setting out these amendments were forwarded to me by email from Rebecca Tompkins on 2 October 2015. I reviewed these further amendments and after the details of one item were adjusted to meet my concerns I agreed that the further amendments proposed were of a minor nature and would generally improve the operation of the designations through the updating of conditions to reflect current best practicable option.</p>

Report writer's recommendation in regard to further minor amendments received on 2 October 2015	I recommend that these further minor amendments, which are separately identified as "Pursuant to minor further amendments received 2-10-2015" under each of the designations referred to in attachment 1 below, be recommended to the Council for confirmation.
Recommendation from Panel	The Panel agrees with the report writer's recommendations.
Reasons	The Panel agrees with the report writer's reasons.

10. Attachment 1 Changes to text of Proposed Auckland Unitary Plan

Designation 8507

Delete Condition 1.

Delete Conditions 3-6.

Delete Conditions 7-12 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2016, insert anew condition as follows:

All construction work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 Acoustics–Construction.

Delete Conditions 13-23 and renumber other conditions.

Amend Condition 26 to read:

Archaeology/ and Cultural/Cultural/Spiritual

If any urupa, traditional sites, taonga (significant artefacts), or koiwi (human remains) are discovered exposed during site works, the following procedures shall apply:

- a. Works in the immediate vicinity of the site that has been discovered shall be suspended pending completion of the steps at (b) to (d) exposed shall cease;
- b. The site supervisor shall immediately secure the area in a way that ensures that any remains or artefacts are untouched;
- c. The site supervisor shall notify representatives of relevant tangata whenua, the New Zealand Historic Places Trust, the Auckland Council and, in the case of human remains, the New Zealand Police; and,
- d. The notification in (c) above shall allow such persons being given a reasonable time to record and recover archaeological features discovered before work may recommence on the exposed site.

Delete Conditions 27-33 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2015; delete Condition 35 and replace with the following:

Any equipment shall be designed and operated to limit the electric and magnetic field exposures to the International Commission on Non-Ionising Radiation Protection, Guidelines for limiting exposure to time varying electric, magnetic, fields (1Hz- 100kHz) (Health Physic 99(6):818-836; 2010) (ICNIRP Guidelines).
That is the public reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at 1 metre above ground level directly above any cable under normal operating conditions. (ie, when there are no faults in the transmission system).

Delete Condition 36 and renumber other conditions.

Amend Condition 37 to read:

The Any new works or equipment shall be designed and constructed so as not to cause existing assets of other utilities to be non-compliant with AS/NZS 4853:2000-2012 Electrical Hazard on Metallic Pipelines.

Delete Advice Notes 1 and 3.

Add a new advice note after the last condition to read:

Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.

Designation 8515

Delete Conditions 1 and 2 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2015, delete Condition 4 and replace with the following:

Any equipment shall be designed and operated to limit the electric and magnetic field exposures to the International Commission on Non-Ionising Radiation Protection, Guidelines for limiting exposure to time-varying electric, and magnetic fields (1Hz – 100kHz), (Health Physics 99(6): 818-836;) (ICNIRP Guidelines). That is the public reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at one metre above ground level under maximum normal operating conditions (ie, when there are no faults in the transmission system).

Delete Condition 6 and renumber other conditions.

Delete Condition 8 and replace with the following:

Any exterior lighting shall be designed to comply with:

- a. AS/NZS 1158 Lighting for Roads and Public Spaces 2005 Part 3.1;
- b. Transpower's guidelines and information for switchyard and grounds lighting TP.DS 40.03.

Amend Condition 11 to read:

Sound levels shall be measured and assessed in accordance with NZS6801:1991 Measurement of Sound NZS 6801:2008 Acoustics - Measurement of environmental sound and NZS6802:1991 Assessment of Environmental Sound NZS6802:2008 Acoustics - Assessment of Environmental Sound.

Pursuant to minor further amendments received 2 October 2015, delete Condition 14 and replace with the following:

Any new part of the facility containing oil shall be designed to comply with Transpower's Oil Spill Management Policy (TPG:GS.54.01).

Pursuant to minor further amendments received 2 October 2015, delete Condition 19 and replace with the following:

All construction work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 Acoustics–Construction Noise.

Pursuant to minor further amendments received 2 October 2015, delete Condition 20 and renumber other conditions.

Amend Condition 21 to read:

Prior to any significant construction work taking place, including any associated significant earthworks, a noise management plan shall be prepared, with the assistance of a suitably qualified and experienced person, that sets out the management procedures in terms of section 8 and Annex E of NZS6803:1999 and the works shall be undertaken in accordance with that noise management plan.

Add an advice note to read:

Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.

Designation 8516

Delete Condition 1 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2015, delete Condition 3 and replace with the following:

Any equipment shall be designed and operated to limit the electric and magnetic field exposures to the International Commission on Non-Ionising Radiation Protection, Guidelines for limiting exposure to time varying electric, magnetic, fields (1Hz- 100kHz) (Health Physic 99(6):818-836; 2010) (ICNIRP Guidelines). That is the public reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at 1 metre above ground level directly above any cable under normal operating conditions. (ie, when there are no faults in the transmission system).

Delete Condition 6 and renumber other conditions.

Amend Condition 7 to read:

~~The Any new works or equipment~~ shall be designed and constructed so as not to cause existing assets of other utilities to be non-compliant with AS/NZS 48523:2000 2012 Electrical Hazard on Metallic Pipelines.

Delete Conditions 8 to 12 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2015, delete Condition 13 and replace with the following:

All construction work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 Acoustics—Construction Noise.

Pursuant to minor further amendments received 2 October 2015, delete Condition 14.

Delete Conditions 17 to 18 and renumber other conditions.

Add an advice note to read:

Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.

Delete all maps in the attachments.

Designation 8517

Delete Conditions 1 and 2 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2015, delete Condition 3 and replace with the following:

Any equipment shall be designed and operated to limit the electric and magnetic field exposures to the International Commission on Non-Ionising Radiation Protection, Guidelines for limiting exposure to time varying electric, magnetic, fields (1Hz- 100kHz) (Health Physic 99(6):818-836; 2010) (ICNIRP Guidelines). That is the public reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at 1 metre above ground level directly above any cable under normal operating conditions. (ie, when there are no faults in the transmission system).

Delete Conditions 5 to 28 and renumber other conditions.

Pursuant to minor further amendments received 2 October 2015, insert the following new condition:

Construction and Maintenance Noise

All construction work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 Acoustics—Construction Noise.

Delete Condition 31 and renumber other conditions.

Insert the following new condition after Condition 32:

Cultural/Spiritual

If any urupa, traditional sites, taonga (significant artefacts), or koiwi (human remains) are exposed during site works, the following procedures shall apply:

- a. Works in the immediate vicinity of the site that has been exposed shall cease;
- b. The site supervisor shall immediately secure the area in a way that ensures that any remains or artefacts are untouched;
- c. The site supervisor shall notify representatives of relevant tangata whenua, the New Zealand Historic Places Trust, the Auckland Council and, in the case of human remains, the New Zealand Police; and,
- d. The notification in (c) above shall allow such persons being given a reasonable time to record and recover archaeological features discovered before work may recommence on the exposed site.

Delete Condition 33 and renumber other conditions.

Add an advice note that reads:

Any new works or equipment means those works which were not existing prior to the notification of the Auckland Unitary Plan.

Designation 8519

Delete Conditions 1 to 3 and renumber other conditions.

Amend Condition 4 to read:

The cables and associated equipment shall be designed, installed and operated so as to meet the NZ National Radiation Laboratory guidelines (as confirmed by the International Commission on Non-Ionizing Radiation Protection, ICNIRP) for general public 24hrs/day exposure. Any equipment shall be designed and operated to limit the electric and magnetic field exposures to the International Commission on Non-Ionising Radiation Protection, Guidelines for limiting exposure to time varying electric, magnetic, fields (1Hz- 100kHz) (Health Physic 99(6):818-836; 2010) (ICNIRP Guidelines). That is the public reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at 1 metre above ground level directly above any cable under normal operating conditions. (ie, when there are no faults in the transmission system).

Delete Conditions 5 to 28.

Pursuant to minor further amendments received 2 October 2015, insert the following new condition:

Construction and Maintenance Noise

All construction work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 Acoustics–Construction Noise.

Delete wording of Condition 31 replace with the following:

Archaeological Cultural/Spiritual

If any urupa, traditional sites, taonga (significant artefacts), or koiwi (human remains) are exposed during site works, the following procedures shall apply:

- a. Works in the immediate vicinity of the site that has been exposed shall cease;
- b. The site supervisor shall immediately secure the area in a way that ensures that any remains or artefacts are untouched;
- c. The site supervisor shall notify representatives of relevant tangata whenua, the New Zealand Historic Places Trust, the Auckland Council and, in the case of human remains, the New Zealand Police; and,
- d. The notification in (c) above shall allow such persons being given a reasonable time to record and recover archaeological features discovered before work may recommence on the exposed site.

Delete Condition 33 and heading.

Add an advice note that reads:

Any new works or equipment means those works which were not existing prior to the notification of the Proposed Auckland Unitary Plan.

Delete the existing diagram of schedule of legal descriptions and replace it with the following:

<u>Parcel ID/Appellation</u>
<u>Pt Lot 1 DP 19750</u>
<u>Sec 1 SO 390576</u>
<u>ALBANY HIGHWAY</u>
<u>Lot 152 DP 156385</u>
<u>STANFORD STREET</u>
<u>Lot 153 DP 156385</u>
<u>Lot 152 DP 162064</u>
<u>VANDERBILT PARADE</u>
<u>Lot 153 DP 162064</u>
<u>Oteha Stream</u>

<u>Lot 300 DP 194881</u>
<u>Lot 202 DP 174290</u>
<u>Lot 300 DP 196382</u>
<u>Lot 303 DP 196381</u>
<u>Sec 1 SO 64438</u>
<u>BUSH ROAD</u>
<u>Pt Lot 452 Parish of</u> <u>Paremoremo</u>
<u>Alexandra Stream</u>
<u>Lot 106 DP 182287</u>
<u>Lot 106 DP 182284</u>
<u>KRISTIN LANE</u>
<u>Lot 107 DP 182282</u>
<u>Lot 2 DP 204886</u>
<u>Lot 4 DP 191979</u>
<u>Lot 101 DP 180879</u>
<u>Lot 1 DP 202139</u>
<u>ROSEDALE ROAD</u>
<u>Lot 75 DP 174612</u>
<u>Sec 1 SO 68325</u>
<u>JACK HINTON DRIVE</u>
<u>Pt Lot 1 DP 174315</u>
<u>Sec 1 SO 68566</u>
<u>PAUL MATTHEWS</u> <u>ROAD</u>
<u>Sec 2 SO 68566</u>
<u>Lot 102 DP 183218</u>
<u>Pt Lot 1 DP 98275</u>

Lot 1 DP 46899

11. Attachment 2 changes to maps in the Proposed Auckland Unitary Plan

That the maps for designations 8507, 8516 & 8519 be amended as set out in the Panel's GIS viewer map of the designation as of 29 April 2016. No map attachments are provided in this report because of the length of the designation makes this impracticable.

12. Expert information

The attached letter providing expert advice supporting the technical conditions contained in the rollover also contained a further attachment (Attachment D) listing additional changes that the requiring authority requested but which were not covered in the original designation in the operative plan, or in the rollover, or in any submission. As discussed above these further amendments were subsequently assessed as being of a technical nature only and where relevant have been recommended as amendments which are separately identified as "Pursuant to minor further amendments received 2-10-2015".



13 August 2015

Harry Bhana
Director
Harry Bhana & Associates Ltd
6 Modena Crescent
Glendowie
Auckland 1071

FROM: Rebecca Tompkins
DIRECT: +64 9 357 9258
MOBILE: +64 22 173 6216
EMAIL: Rebecca.Tompkins@chapmantripp.com
PARTNER: Catherine Somerville
REF: 100136047/4389762.2

by email

Dear Mr Bhana

TOPIC 074 DESIGNATIONS - RESPONSE TO REQUEST FOR FURTHER INFORMATION

Introduction

- 1 We act for Transpower New Zealand Limited (*Transpower*) in relation to Topic 074 Designations of the Proposed Auckland Unitary Plan (*Unitary Plan*).
- 2 We refer to your email of 28 July 2015, requesting further information in relation to the changes sought by Transpower to conditions in its Notices of Requirement and designations to be rolled over into the Unitary Plan.

Further information provided

- 3 In response to your request, please find **attached**:
 - 3.1 As **Attachment A**, a table summarising the relevant conditions, further information requested and response provided by Transpower, including:
 - (a) Confirmation from Robert Deller, Transpower's Principal Engineer – Asset Engineering Lines, that:
 - (i) The proposed oil spill management conditions are in accordance with best practice and were accepted by the Board of Inquiry for the North Island Grid Upgrade Project (*NIGUP*);
 - (ii) The proposed light spill management conditions will adequately mitigate the effects of exterior lighting on the substation sites and were accepted by the Board of Inquiry for *NIGUP*;
 - (b) Confirmation from Robert Deller in relation to lines and Jitesh Raniga, Transpower's Senior Development Engineer – Asset Engineering Stations, in relation to substations, that the proposed conditions will adequately mitigate the effects of earth potential rise and ensure electrical safety from the facility, and were accepted by the Board of Inquiry for *NIGUP*; and

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- (c) Confirmation from Jitesh Raniga that the proposed conditions will adequately mitigate the effects of radio frequency interference emitted from the substation site or transmission line.
- 3.2 As **Attachment B**, a letter from Lindsay Hannah and Malcolm Hunt, Malcolm Hunt Associates confirming that:
- (a) The proposed conditions will adequately mitigate the effects of noise and vibration emitted during construction and maintenance; and
 - (b) The proposed conditions will adequately mitigate the effects of operational noise and vibration.
- 3.3 As **Attachment C**, a letter from Matthew Walker, an Environmental Specialist at Transpower, confirming that the proposed conditions will adequately mitigate the effects of electric and magnetic fields emitted from the substation site or transmission line.
- Additional amendments sought**
- 4 In the course of assessing the proposed changes to the designation conditions in order to respond to your request, Transpower has identified some further, minor amendments to the conditions which, based on the advice of relevant experts, it considers are necessary.
 - 5 The further changes sought are shown in as track changes to Transpower's original submission on the Unitary Plan, **attached as Attachment D** to this letter. In summary, the changes are the:
 - 5.1 Deletion of the term "maintenance" in the construction noise and vibration conditions as it is already included within the definition of "construction" within NZS6803;
 - 5.2 Deletion of the unnecessary exception for noise limits for emergency works in the conditions as this is already provided for in NZS6803;
 - 5.3 Replacement of the term "audible noise" and the reference to the substation boundary as the assessment location in substation designation conditions;
 - 5.4 Removing the reference to NZS6081 and NZS6802 where there is no decibel noise limit specified within the designation conditions for the particular substation site;
 - 5.5 Amendments to Advice Note 11 of Designation 8513: Otahuhu Electricity Substation to refer to NZS6802:2008 for consistency with updated conditions;
 - 5.6 The removal of redundant noise and vibration conditions in relation to construction works that have already been completed; and

- 5.7 Minor revisions to the conditions in relation to electric and magnetic fields to correct errors made in its original submission, and to ensure that the most up to date guidance is referred to.
- 6 These changes are supported by the technical expert assessments provided, and are to correct errors and reflect current best practice. Accordingly, Transpower considers that the further changes will not alter the effects of the designations on the environment.
- 7 If you have any questions in relation to the further information provided, or the additional amendments to the conditions now sought, please feel free to contact Rebecca Eng, Transpower's Senior Environmental Planner on 027 578 5232 or rebecca.eng@transpower.co.nz

Yours sincerely



Luke Hinckley / Rebecca Tompkins
SENIOR ASSOCIATE / SENIOR SOLICITOR

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ATTACHMENT A - SUMMARY OF TRANSPower's RESPONSE TO REQUEST FOR FURTHER INFORMATION

TRANSPower NEW ZEALAND LIMITED – AUCKLAND COUNCIL: S.142 REQUEST IN RELATION TO TOPIC 074 DESIGNATIONS

SUMMARY OF INFORMATION REQUESTED AND RESPONSE PROVIDED

Topic	Condition	\$142 information request	Transpower Technical Expert Response
Construction and Maintenance Noise	<p>2. Subject to condition 3 below, all construction and maintenance work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 Acoustics—Construction Noise at locations set out in section 6.2 of that standard.</p> <p>3. The noise limits shall not apply to emergency work required to re-establish continuity of supply, work urgently required to prevent loss of life or other personal injury, or commissioning works at the substation site, but all practicable steps shall be undertaken to control noise and to avoid adverse noise effects, particularly at times when the stricter noise limits apply (e.g. at night-time)..</p> <p>4. Prior to any significant construction work taking place, including any earthworks, a noise management plan shall be prepared, with the assistance of a suitably qualified and experienced person, that sets out the management procedures in terms of section 8 and Annex E of NZS6803:1999 and the works shall be undertaken in accordance with that noise management plan.</p>	<p>These conditions apply to substations. Confirmation from acoustic expert that the proposed conditions will adequately mitigate the effects of noise emitted during construction and maintenance is required.</p>	<p>See attached correspondence prepared by Malcolm Hunt Associates dated 6 August 2015 confirming that the condition is appropriate provided reference to "maintenance" is deleted. Transpower now seeks further refinement to this standard condition to delete reference to "maintenance" for the reasons detailed in the Malcolm Hunt Associates letter.</p> <p>See attached correspondence prepared by Malcolm Hunt Associates dated 6 August 2015 recommending deletion of this condition. Transpower now seeks that this condition is deleted across all of its designations for the reasons detailed in the Malcolm Hunt Associates letter.</p>
			<p>See attached correspondence prepared by Malcolm Hunt Associates dated 6 August 2015 confirming support for the proposed wording with no revisions.</p>

ATTACHMENT A – SUMMARY OF TRANSPower's RESPONSE TO REQUEST FOR FURTHER INFORMATION

Topic	Condition	S142 Information request	Transpower Technical Expert Response
	5. The noise management plan required by the above condition 4 shall be submitted to Council's Consents Manager for approval, at least 20 working days prior to the works commencing. The Council's Consents Manager shall respond within 20 working days indicating whether approval is given or refused. Approval shall not be unreasonably withheld.		See attached correspondence prepared by Malcolm Hunt Associates dated 6 August 2015, confirming support for the proposed wording with no revisions.
Vibration	6. Vibration from all construction activities shall not exceed the limits of, and shall be measured and assessed in accordance with, German Standard DIN 4150-3 (1999-02) Structural vibration – Effects of vibration on Structures.	These conditions apply to substations and transmission lines. Confirmation from acoustic/vibration expert that the proposed conditions will adequately mitigate the effects of vibration emitted during construction and maintenance is required.	See attached correspondence prepared by Malcolm Hunt Associates dated 6 August 2015, confirming support for the proposed wording with no revisions.
Operational noise	13. A noise management plan shall be submitted for any new equipment (such as transformers, fans and circuit breakers) that is likely to generate noise audible at the designation site boundary.	These conditions apply to substations. Confirmation from acoustic expert that the proposed conditions will adequately mitigate the effects of noise emitted during construction and maintenance is required. Note submission by NZS6021:2008 so reference to this standard would be appropriate.	See attached correspondence prepared by Malcolm Hunt Associates dated 6 August 2015 confirming that the condition is appropriate provided that the reference to "audible noise" and the reference to the substation boundary as the assessment location is removed. Transpower now seeks that this condition is amended for the reasons detailed in the Malcolm Hunt Associates' letter.
	14. Sound levels shall be measured and assessed in accordance with NZS601:1999 Measurement of Sound and NZS602:2008 Acoustic – Assessment of Environmental Sound.		Wording proposed in Transpower submission supported by Malcolm Hunt Associates, where a designation has specified operational noise limits. Otherwise this condition is proposed to be deleted for the reasons detailed in the Malcolm Hunt Associates letter dated 6 August 2015.

ATTACHMENT A – SUMMARY OF TRANSPower's RESPONSE TO REQUEST FOR FURTHER INFORMATION

Topic	Condition	S142 information request	Transpower Technical Expert Response
Hazardous substances	7. Any new part of the facility containing oil shall be designed to comply with Transpower's Oil Spill Management Policy [TP: GS.54.01], issue 3, December 2011.	A simple confirmation that this condition is in accordance with best practice and has been accepted by the Environment Court or by a Board of Enquiry.	<p>Transpower uses insulating oil in its transformers, circuit breakers and other transmission equipment. The quantities of oil used and the requirement to transport, store, handle and process large quantities of oil are a potential environmental hazard if suitable spill management practices are not established and used. This Policy standard covers the policies that are required for these spill management practices. It is periodically updated by Transpower to reflect changes in best practice.</p> <p>The Board of Inquiry (BO) decision (September 2009) for the North Island Grid Upgrade Project (<i>NGUP Decision</i>) accepted a condition requiring compliance with this standard at a number of substations, including Brownhill, Pakuranga and Ohahu. Transpower now respectfully requests that the reference to issue numbers and dates associated with the policy are deleted from the condition to ensure that it does not become obsolete during the current life of the requirement. This change is shown in further track changes to designation text provided in attachment D. Removing reference to the specific issue number and date will not change the effects of the designation(s) on the environment because Transpower will still be required to comply with the most up to date version of the policy.</p> <p>Robert Deller: Principal Engineer – Asset Engineering Stations, Transpower New Zealand Limited</p>

ATTACHMENT A – SUMMARY OF TRANSPower'S RESPONSE TO REQUEST FOR FURTHER INFORMATION

Topic	Condition	S142 information request	Transpower Technical Expert Response
Electric and Magnetic Fields (EMF)	8. Any new equipment shall be designed and operated to limit the EMF exposure at or beyond the secure boundary of the substation site to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4): 494–522) (ICNIRP Guidelines) public reference levels of 5 kV/m for electric fields and 100 μ T for magnetic flux density at one metre above ground level under maximum normal operating conditions (i.e., when there are no faults in the transmission system).	These conditions apply to substations and transmission lines. Confirmation from a suitably qualified expert that the proposed conditions will adequately mitigate the effects of EMF emitted from the site/line is required. Note update reference "Health Physics 1998, 74(4): 494–522" to (Health Physics 97(3):257–259; 2009). Please report on proposed updated reference.	See attached advice prepared by Matthew Walker of Transpower NZ Ltd dated 13 August 2015. Transpower now seeks further revisions to the conditions to correct errors made in its original submission, and to ensure that the most up to date guidance is referred to. The reasons for further amendments are detailed in the advice note prepared by Matthew Walker.
Radio frequency interference	9. Any new works or equipment shall comply with NZS 6669:2004 Limits and Measurement Methods of Electromagnetic Noise from High-Voltage a.c. Power Systems, 0.15 to 1000 MHz.	These conditions apply to substations and transmission lines. Confirmation from a suitably qualified expert that the proposed conditions will adequately mitigate the effects of radio frequency interference emitted from the site/line is required.	For reasons given in its original submission, Transpower's preference is that Condition "10" is deleted.
Earth potential rise	10. In designing and constructing new works, Transpower shall give consideration to third-party conductive services to ensure compliance with regulations 58, 60, 69 and 87 of the Electricity Regulations 1997 as in force at the date of confirmation of the designation.	These conditions apply to substations. Confirmation from a suitably qualified expert that the proposed conditions will adequately mitigate the effects of Earth Potential Rise and to ensure electrical safety arising from the facility is required. Note submission by	In the event that the Panel is minded to retain this condition it is confirmed that both conditions "10" and "11" were imposed on substation designations for NIgUP.

ATTACHMENT A – SUMMARY OF TRANSPower'S RESPONSE TO REQUEST FOR FURTHER INFORMATION

Topic	Condition	S142 information request	Transpower Technical Expert Response
	11. Any new substation earth grids shall be designed, built, and tested to ensure electrical safety at or beyond the designation boundary in accordance with Transpower Standard Design of Substation Earthing TP.DS.52.01, Issue 2, January 2005.	<p>Transpower seeks to update Condition to read: "Any new works or equipment shall be designed and constructed to comply with the Electricity Safety Regulations 2010. Alternatively, delete condition 10." Please report on amendment.</p>	<p>Interference</p> <ul style="list-style-type: none"> • Earth potential rise and transferred voltages associated with overhead line <p>Paragraph 1849 of the NI/GUP Decision states:</p> <p>"At the closing of the Inquiry hearing, Transpower submitted to the Board proposed conditions for the designation requirements [and for the resource consents]. The Board sets out those conditions in Appendixes [sic] to this report [as follows]."</p> <p>Paragraph 1852 goes on to state:</p> <p>"The Board is satisfied that, if the requirements are confirmed and if the resource consents are granted, the proposed conditions in those appendices should be imposed."</p> <p>With regard to condition "11" Transpower now respectfully requests that the reference to issue numbers and dates associated with the policy are deleted from the condition to ensure that it does not become obsolete during the current life of the requirement. This change is shown in further track changes to designation text (Attachment D).</p> <p>Removing reference to the specific issue number and date will not change the effects of the designation(s) on the environment because Transpower will still be required to comply with the most up to date version of the standard.</p> <p>Jitesh Raniga: Senior Development Engineer – Asset Engineering Lines, Transpower New Zealand Limited</p>

ATTACHMENT A – SUMMARY OF TRANSPower'S RESPONSE TO REQUEST FOR FURTHER INFORMATION

Topic	Condition	S142 Information request	Transpower Technical Expert Response
Light spill	12. All exterior lighting shall comply with:[a] AS/NZS 1158 Lighting for Roads and Public Spaces 2005 Part 3.1; and [b] Transpower's Guidelines and Information for Switchyard and Grounds Lighting, TP DS 40.03, Issue 1, April 2012; and [c] AS 4282 1997, Control of Obtrusive Effects of Outdoor Lighting.	<p>These conditions apply to substations. Confirmation from a suitably qualified expert that the proposed conditions will adequately mitigate the effects of exterior lighting on the site is required. Note submission by Transpower seeks to update Condition (b) to "b", Transpower's guidelines and information for switchyard and grounds lighting TP.DS 40.03, Issue 1, 2012. Please report on amendment.</p>	<p>The purpose of TP DS 40.03, "Information for switchyard and Grounds Lighting" is to provide guidelines and information for the design and installation of new or replacement lighting in HVAC and HVDC switchyards and grounds. It is periodically updated by Transpower to reflect changes in best practice. The policy has been developed to establish a consistency in the lighting requirements for outdoor switchyards and grounds.</p> <p>The NGUP Decision accepted a condition requiring compliance with this standard at a number of substations, including Brownhill, Pakuranga and Ohahu. Transpower now respectfully requests that the reference to issue numbers and dates associated with the policy are deleted from the condition to ensure that it does not become obsolete during the current life of the requirement. This is particularly relevant given that the policy was updated in July 2015 which means that the version referred to in the submission is out of date.</p> <p>This change is shown in further track changes to designation text at attachment D. Removing reference to the specific issue number and date will not change the effects of the designation(s) on the environment because Transpower will still be required to comply with the most up to date version of the standard as required by the condition.</p>

ATTACHMENT A – SUMMARY OF TRANSPower'S RESPONSE TO REQUEST FOR FURTHER INFORMATION

Topic	Condition	S142 information request	Transpower Technical Expert Response
			Robert Deller: Principal Engineer – Asset Engineering Stations, Transpower New Zealand Limited

ATTACHMENT B

Malcolm Hunt Associates



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Date of Issue: 12 August 2015

Client Name: REBECCA FNG
Senior Environmental Planner
Environmental Policy and Planning Team
Transpower NZ Limited
Auckland

Project Reference: T.B.C.

Name of File: RIA to ENERGY\TRANSMISSION\Transpo\own\Planning Advice\Review of TP Submissions on FM/P Notice and VIs due

Document version: Rev.5

Document Status Final

Document Prepared By: Lindsay Hannah and Malcolm Hunt

Transpower NZ Limited
Re: Review Of Transpower's Submission on PAUP Designations
Noise & Vibration Matters

1.0 Introduction

Malcolm Hunt Associates [MHA] have been commissioned by Transpower to conduct a review on technical noise and vibration matters associated with its submissions on Designation Conditions of the Proposed Auckland Unity Plan (PAUP).

Designations are shown in the Unitary Plan as:

- A schedule for each requiring authority which summarises the designations and notices of requirement (NoRs) they are responsible for;
 - A full text version of each designation and NoR, which includes the purpose of the designation and any conditions; and
 - An overlay on the planning maps for each designation and NoR, which shows the extent of the designation boundaries.

Section 176(1)(a) of the RMA states that the usual provisions of the District Plan do not apply to a public work, project or work undertaken by a requiring authority under a designation. This means the normal provisions of the Unitary Plan (district plan provisions) do not apply to a designation and the requiring authority is allowed to use the land for

MalcolmHuntAssociates

any activity within the scope of the designation. Activities that fall outside the scope of a designation are subject to the normal provisions of the Unitary Plan.

Without the normally applied PAUP noise and vibration provisions applying, any specific noise or vibration requirements of the designation conditions would have to be complied with. Thus the wording of these conditions becomes critical.

Apart from recommendations made below to improve the wording of designation conditions where necessary, our review has found the noise and vibration conditions set out within the PAUP, as proposed, are adequate to control and mitigate noise and vibration effects of the designations on the environment.

2.0 Overview

Transpower's Auckland transmission network distributes power within the region and provides through transmission to the Northland region. It consists of three layers: the 220 kV network, and the 110 kV network. The Auckland region has some of the highest load densities in New Zealand, coupled with relatively low levels of local generation. Designations within the PAUP play an important role in enabling the on-going operation of this critical infrastructural asset.

While approved designations may not include any controls over noise or vibration arising from carrying out of designation activities, it is accepted that from time to time it is appropriate for Designations to include such controls as limits on noise and vibration effects.

This report reviews the technical basis for changes Transpower has sought in relation to construction noise and vibration as well as operational noise associated with the activities conducted on the designated Transpower sites. It is noted the designations are largely sought to be "rolled over" which also acknowledges the need for a continuance of any limits or restrictions on noise or vibration at the same limits and time periods, unless there are good reasons to amend the conditions within the current roll over process.

In this regard Transpower have rightfully identified this opportunity to amend and update references to specific Standards and procedures, as well as correct any obvious errors or omissions. We agree these types of changes in the wording of designation conditions are necessary as they ensure "...the designations are all consistent, effective and clear – especially when read *in the context of the wider Proposed Plan*" (ref. Page 1 Transpower's Submission to the PAUP submitter no. 3766).

Based on experience with best practice and developing effective and workable noise rules in District Plans, the finding is that the approach sought by Transpower within its 'decisions sought' is entirely reasonable and technically supportable.

Malcolm Hunt Associates



The comments below are based on a best practice approach to controlling noise and vibration effects to reasonable levels.

Recommendations are set out below for the wording of designation conditions to suitably control noise and vibration from the construction and operation of equipment within Transpower's designated sites. Accepting these recommendations will require amendments and adjustments beyond those forwarded to Council within the changes requested in Appendix 3 to the Transpower submission; however the amendments are supported to ensure the PAUP designation conditions are correct, simple to follow and enforceable at law.

3.0 Construction Noise

The approach taken with respect to construction noise is to correctly refer to the relevant NZ Standard NZS6803:1999 Acoustics – Construction Noise.

This Standard is employed within the standardized approach adopted within Transpower's designations as follows:

Condition	Comment
Subject to condition 3 below, all construction and maintenance work shall be designed, managed and conducted to ensure that construction and maintenance noise from the site does not exceed the limits in NZS6803:1999 <i>Acoustics - Construction Noise</i> at locations set out in section 6.2 of that standard.	1. The term "maintenance" is already included within the definition of "construction" within this Standard. 2. These words are not necessary.
The noise limits shall not apply to emergency work required to re-establish continuity of supply, work urgently required to prevent loss of life or other personal injury, or commissioning works at the substation site, but all practicable steps shall be undertaken to control noise and to avoid adverse noise effects, particularly at times when the stricter noise limits apply (e.g. at night time).	1. This exception is not needed as the construction noise Standard NZS6803:1999 states at clause 1.5 "This Standard does not apply to emergency works as defined in the Resource Management Act 1991."
4. Prior to any significant construction work taking place, including any earthworks, a noise management plan shall be prepared, with the assistance of a suitably qualified and experienced person, that sets out the management procedures in terms of section 8 and Annex E of NZS6803:1999 and the works shall be undertaken in accordance with that noise management plan.	Support this wording
5. The noise management plan required by the above condition 4 shall be submitted to Council's Consents Manager for approval, at least 20 working days prior to the works commencing. The Council's Consents Manager shall respond within 20 working days indicating whether approval is given or refused. Approval shall not be unreasonably withheld.	Support this wording

The amended wording will ensure Noise Management Plans are applied effectively and efficiently to reasonably control construction noise, in a manner consistent with best practice in this area.

¹ NZS6803:1991 definition of "Construction" is attached as APPENDIX A.

Malcolm Hunt Associates

4.0 Construction Vibration

Vibration effects are only relevant where construction activities take place at substations or transmission pylons. As with construction noise, affected communities can tolerate construction vibration effects where they are temporary in nature. Thus, best practice in this area has been to adopt designation conditions for construction vibration which control the worst effects of construction vibration, such as vibration levels sufficient to potentially damage buildings. This is the approach adopted below which is consistent with best practice to control construction vibration effects on the environment.

The following comments are made with respect to the generic wording of the following condition applying to construction vibration:

Condition	Comment
6. Vibration from all construction activities shall not exceed the limits of, and shall be measured and assessed in accordance with, German Standard DIN 4150-3 (1999-02) Structural Vibration – Effects of Vibration on Structures.	Support this wording

There are no New Zealand Standards directly dealing with the vibration effects on buildings. An expert paper has been recently published regarding the review of the various international vibration standards commenting on the usefulness of each Standard and comparing the degree of "protection" each standard afforded². The review considered the following standards:

- ANSI S2.71-1983 (R 2006) "Guide to the Evaluation of Human Exposure to Vibration in Buildings", American National Standards Institute, 2006
- AS 2670.2:1990 "Evaluation of human exposure to whole-body vibration – Part 2: Continuous and shock-induced vibration in buildings (1 to 80 Hz)", Standards Australia, 1990
- BS 5228-2:2009 "Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration", British Standards Institute, 2009
- BS 6472-1:2008 "Guide to evaluation of human exposure to vibration in buildings – Part 1: Vibration sources other than blasting", British Standards Institute, 2008
- BS 6472-2:2008 "Guide to evaluation of human exposure to vibration in buildings – Part 2: Blast induced vibration", British Standards Institute, 2008
- BS 7385-1:1990 "Evaluation and measurement for vibration in buildings – Part 1. Guide for measurement of vibration and evaluation of their effects on buildings", British Standards Institute, 2008 BS 7385-2:1993 "Evaluation and measurement for vibration in buildings – Part 2. Guide to damage levels from ground borne vibration", British Standards Institute, 1993
- DIN 4150-2:1999 "Structural vibration – Part 2: Human exposure to vibration in buildings", Deutsches Institut für Normung, 1999
- DIN 4150-3:1999 "Structural vibration – Part 3: Effects of vibration on structures". Deutsches Institut für Normung, 1999

Regarding the German Standard DIN 4150-3 (1999-02), the review reported "The adoption of a statistical approach to the implementation of DIN 4150-3;1999 is

² A Review of the Adoption of International Vibration Standards In New Zealand by James Whitlock, Marshall Day Acoustics, Auckland. New Zealand Acoustics Vol. 24 / # 2

considered pragmatic, and promotes comprehensive monitoring and assessment of vibration activities such as construction works."

The review goes on to say "The DIN 4150-3:1999 standard is therefore considered most suitable to assess and quantify the risk of building damage from vibration."

We support the above review findings and therefore recommend the reference to DIN 4150-3 (1999-02) be retained in the designation conditions for the effective and efficient control of vibration effects on buildings.

5.0 Operational Noise

Designation conditions covering noise from on-going operation of equipment operating on Transpower sites in accordance with the PAUP designations are found within designation conditions for some Transpower designated sites.

The following two generic operational noise conditions are included in the PAUP Transpower designations:

Condition	Comment
A noise management plan shall be submitted for any new equipment (such as transformers, fans and circuit breakers) that is likely to generate noise <u>audible at the designation site boundary - received within any residential zone site or the notional boundary to any rural dwelling.</u>	Support this wording <u>In part</u>
Sound levels shall be measured and assessed in accordance with NZS6801:1999 Measurement of Sound and NZS6802:2008 Acoustic – Assessment of Environmental Sound.	Remove OR Amend

Each of these two conditions are discussed as follows:

5.1 Noise Management Plan

The "noise management plan" approach is supported. We agree at some sensitive sites noise from new equipment needs to be carefully managed at times when new equipment is installed³.

However this approach is not needed in all situations. Noise and vibration only needs to be reasonably limited at noise sensitive sites. Controlling audible noise for locations

³ We have hands on experience in the assessment of noise from Transpower's substations both before and after certain capital works are carried out.

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beyond the designation site boundary may not be efficient for sites where land uses in the vicinity are not noise sensitive.

We consider it is acceptable to require a Noise Management Plan where "new equipment" is to be installed, however we recommend the wording be amended so that a Noise Management Plan to control operational noise effects is only necessary where nearby sites are classified as noise sensitive (residentially zoned sites or the national boundary to dwellings in rural areas).

We also recommend removing the term "audible noise" as this invites the interpretation that any audible sound from the site could be classified as "noise" and thereby considered unreasonable. In reality, the PAUP provides both generic and in some cases specific guidance on what reasonable levels of noise emission from Transpower sites should be. These are the objective limits that should be met, as opposed to whether or not a sound is "audible" (which can vary due to a host of factors including the weather and levels of ambient sound found in the area).

In summary, our recommendation is to:

- A. Retain the current requirements to prepare a "Noise Management Plan" where this is already referred to in conditions, and;
- B. Amend condition wording (as above) to remove the term "audible noise" and the reference to the substation boundary as the assessment location.

5.2 NZ Standards

Best practice with respect to writing noise rules is dictated by the relevant recommendations of Section of NZS6802:2008 Acoustics – Environmental Noise. This Standard recommends that under Section 8.1.3 noise limits should include a number of basic elements, including "reference to Standards for measurement and assessment methods" (ref. NZS6802:2008 Section 8.1.3(F)).

This is because the correct interpretation, application and compliance testing will rely on these Standards to ensure the limits are enforced consistently and with the desired effect.

However, within 33 designations published in the PAUP for Transpower sites, only 6 (six) designations include decibel noise limits which would trigger the need to include any reference to NZ noise and acoustic Standards.

Thus, where the designation conditions refer to a decibel noise limit, we recommend retaining the reference to NZ Standards NZS6801 and NZS6802 as this is a key requirement which ensures the noise limit is enforceable and can be enforced in a consistent manner.

We recommend removing the reference to NZ Standards where there is NO decibel noise limit specified within the designation conditions for the site. This because the

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reference to these two Standards is not necessary and does not provide any useful guidance.

Attached as **APPENDIX B** are specific recommendations for amending Transpower designations in the PAUP where NZS6801 / NZS6802 are mentioned. The recommendations are based on the above discussion but have been translated into a single document setting out specific recommendations to deal with the NZS6801/NZS6802 matter.

5.3 Use Of 2008 NZ Standards With L10 Noise Limits

Numerical noise limits are specified only within the following designations in the PAUP:

<i>Designation No.</i>	<i>Designation Name:</i>
8512	Brownhill to Whakamaru Overhead Transmission Line
8513	Otahuhu Substation
8514	Pakuranga Substation
8515	Brownhill Road Substation
8521	Drury Substation
8524	Huapai substation

Reference to the two NZ Standards NZS6801 and NZS6802 only needs to occur within the designation conditions for designations that stipulate an enforceable noise limit. Else, the inclusion of the names of these two Standards serves no useful purpose.

For the above-identified SIX designations where noise limits are included, we the notified PAUP contained reference to the following versions of NZS6801 and NZS6802:

Published 1991:

NZS 6801:1991 *Measurement of Environmental Noise*
 NZS 6802:1991 *Assessment of Environmental Noise*

Published 1999

NZS 6801:1999 *Acoustics – Measurement of Sound*
 NZS 6802:1999 *Acoustics – Assessment of Environmental Sound*

Published 2008:

NZS 6801:2008 *Acoustics – Measurement of Environmental Sound*
 NZS 6802:2008 *Acoustics – Environmental Noise*

As publicly notified, conditions applying to noise from Transpower on-going operations on designated sites where a specified noise limit is applied in FIVE of the SIX cases correctly quote both NZS6801 and NZS6802 as a "pair" (that is, as they are designed to be used together).

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However, within the PAUP designation conditions we find the versions of the NZ Standards referred to are often mis-matched with no consistent picture emerging.

Our recommendation is that a reference to the relevant NZ acoustic standards is necessary wherever the designation conditions specify an operational noise limit to be complied with. In this case we recommend the technically most up to date 2008 versions. Thus, wherever a noise limit is specified within conditions BOTH the following standards should also be included within the designation conditions:

NZS 6801:2008 Acoustics – Measurement of Environmental Sound
NZS 6802:2008 Acoustics – Environmental Noise

While these Standards were designed for use with the LAeq noise unit as the basis for noise assessment, there are no technical barriers if these 2008 standards are applied to the measurement and assessment of noise quantified in terms of L10 units.

The unit L10 is defined within the 2008 Standards and there is a high degree of similarity in approach between the 1991 / 1999 versions of this Standard. There are no barriers to using the above 2008 NZ acoustic Standards to assess the measured L10 noise levels. This approach will require the user to adopt the measured L10 value as if it were the measured LAeq within the NZS6802:2008 assessment process. Thus, the finally produced "L_r" level within NZS6802:2008 would be found by adjusting the measured L10 level and adjusting as required for tonality, background sound, etc.

While acknowledging use of measured L10 sound level in place of a measured LAeq sound levels is not an ideal approach, there are no technical difficulties with enforcement. Retaining the L10 noise limits and applying the 2008 NZ Standards has the advantages of:

1. Avoiding technical arguments around whether L10 or LAeq would allow different amounts of noise emission. Traditionally LAeq and L10 measure quite close to each other (for the same sound level), which is especially so where the sound source is fairly uniform in output (such as substation sounds) – in those situations the typical difference between these two types of measurement units would be 1 dB or less.
2. Being able to adopt the more recently developed noise measurement and assessment methodologies of the 2008 versions of NZS6801 and NZS6802, such as allowing for the contaminating effects of residual sound.

Thus, the overall advantage is that the 2008 versions of the two relevant NZ Standards can be incorporated into the designation conditions to control operational noise (where necessary) without opening up potentially difficult technical arguments around whether L10 or Leq may allow for different levels of noise emission.

In relation to Designation 8513 "Otahuhu Electricity Substation" we note in the "Advice Note" to Condition 11 that the 1991 version of NZS6802 is referred. As above, we

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recommend this be amended to the 2008 version of NZS6802. This will cause a minor consequential wording change to the advice note as follows:

The 1991 version of that Standard recommends that a 5dB "penalty" apply where a sound is assessed as possessing "special audible character" to account for the added annoyance such sounds may generate. That is why the Advice Note states "These sound levels contain special audible characteristics and an assessment using NZS6802:1998 would cause any performance standard to be reduced by 5 dB." However, this same adjustment under where the 2008 version of NZS6802 is slightly different as the "penalty" is applied by adding 5 dB to the measured level to account for the added annoyance of sound which contain "special audible characteristics". Thus the last sentence of the "Advice Note" under Condition 11 be re-written as:

These sound levels may contain special audible characteristics. Assessment under NZS6802:2008 may require sound levels measured at sensitive receiver sites to be increased by 5 dB to reflect the potential added annoyance such sounds may generate".

This amendment retains the original intent of the advice note, but updates its commentary to relate to the 2008 version of standard NZS6802 (in place of the 1991 version currently referred to).

6.0 Removal Of Redundant Noise & Vibration Requirements

The PAUP will also be improved by removing unnecessary wording relating to construction works that have already been completed.

For example, Designation 8507 : 8507 Pakuranga to Penrose Underground Transmission Cables includes conditions that refer to the control of noise and vibration during construction, including the production of a Noise & Vibration Management Plan. As we understand these works are completed, we see no reason for these requirements to remain in the designation conditions.

7.0 Summary

We have undertaken a review of noise and vibration conditions attached to Transpower's designations in the PAUP. This review has found a number of deficiencies in the noise and vibration conditions as notified, however recommendations have been made that will remove these deficiencies and result in a set of noisier and vibration designation conditions that will be well suited to controlling potential noise and vibration effects of designation activities have on the environment.

Amendments have been recommended in order to update the conditions in accordance with "best practice", and improve workability. The most significant change relates to noise and acoustic standards referred to "Operational Noise" conditions. We

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have identified references to different versions of NZ Standards NZS6801 and NZS6802 throughout the designation conditions, however none of these references are considered necessary unless a specific noise performance standard is set out within the conditions.

Overall, with amendments in place, noise and vibration effects of construction and on-going operation of Transpower's assets covered by the designations will be able to be measured, assessed and controlled in accordance with best practice and the methods for measuring and assessing noise found elsewhere within the PAUP. Thus, the amended designation conditions will be efficient and effective in controlling noise and vibration effects on the environment.

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Lindsay Hannah

Consultant

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Principal Acoustic Engineer

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Document Sign off

Malcolm Hunt [12 August 2015]

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APPENDIX A – Definition of “Construction Noise”

Ref. Section 3, NZS6803:1999 *Acoustics – Construction Noise*

CONSTRUCTION WORK means any work in connection with the construction, erection, installation, carrying out, repair, maintenance, cleaning, painting, renewal, removal, alteration, dismantling, or demolition of:

- (a) Any building, erection, edifice, structure, wall, fence or chimney, whether constructed wholly or partly above or below ground level;
- (b) Any road, motorway, harbour or foreshore works, railway, cableway, tramway, canal, or aerodrome;
- (c) Any drainage, irrigation, or river control work;
- (d) Any electricity, water, gas, or telecommunications reticulation;
- (e) Any bridge, viaduct, dam, reservoir, earthworks, pipeline, aqueduct, culvert, drive, shaft, tunnel, or reclamation; or
- (f) Any scaffolding.

Construction work includes:

- a) any work in connection with any excavation, site preparation, or preparatory work, carried out for the purpose of any construction work;
- b) the use of any plant, tools, gear, or materials for the purpose of any construction work;
- c) any construction work carried out underwater, including work on ships, wrecks, buoys, rafts, and obstructions to navigation; and
- d) any inspection or other work carried out for the purpose of ascertaining whether construction work should be carried out.

CONSTRUCTION NOISE means noise arising from any construction work, as defined above.

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**APPENDIX B – Recommendations: Operational Noise
Provisions PAUP**

Noise conditions technical assessment – Operational Noise ONLY

Number	Name	Designation Condition Mentioning 6801 or 6802?	Standards Referenced	Noise LIMITS Stated?	Recommended Action
8500	Ash Street <i>Overhead Transmission Lines</i>	Nil	-	-	-
8501	Penrose Substation	Condition 14	6801:1999 6802:2008	No	Recommend Remove Condition and ref to 6801/6802
8502	Pakuranga to <i>Penrose Transmission Lines</i>	Nil	-	-	-
8503	Mount Roskill Substation	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition and ref to 6801/6802.
8504	Boundary Road <i>Overhead Transmission Lines</i>	Nil	-	-	-
8505	Haycock Avenue <i>Overhead Transmission Lines</i>	Nil	-	-	-
8506	Barrack Road <i>Overhead Transmission Lines</i>	Nil	-	-	-
8507	Pakuranga to <i>Penrose Underground Transmission Cable</i>	Nil	-	-	-
8508	Richardson Road <i>Overhead Transmission Line</i>	Nil	-	-	-
8509	Luke Street <i>Overhead Transmission Line</i>	Nil	-	-	-
8510	Glenbrook Substation	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition and ref to 6801/6802.
8511	Bombay Substation	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition and ref to 6801/6802.

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8512	<i>Brownhill to Whakamaru Overhead Transmission Line</i>	<i>that part of the line between towers 5 & 33</i> Condition 14	6801:1991 6802:1991	Yes	Replace ref to older versions with 2008 versions
		<i>that part of the line between towers 33A and 65:</i> Condition 15	6801:1999 6802:2008	YES	Replace ref to older versions with 2008 versions
8513	<i>Otahuhu Substation</i>	Condition 12 Conditions 15-18 inclusive	6802:1991 (only)	YES	Replace ref to older versions with 2008 versions Also amend "Advice note 1" to refer to NZS6902:2008
8514	<i>Pakuranga Substation</i>	Conditions 13	6801:1991 6802:2008	YES	Replace ref to older versions with 2008 versions
8515	<i>Brownhill Road Substation</i>	Conditions 11	6801:1991 6802:1991	Yes	Replace ref to older versions with 2008 versions
8516	<i>Brownhill to Pakuranga Underground Transmission Cable</i>	<i>Nil</i>	-	-	-
8517	<i>Brownhill Road to Otahuhu Underground Transmission Cable</i>	<i>Nil</i>	-	-	-
8518	<i>Albany Substation</i>	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition
8519	<i>North Shore Underground Transmission Cable</i>	<i>Nil</i>	-	-	-
8520	<i>Takanini Substation</i>	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition
8521	<i>Drury Substation</i>	Condition 13	6801:1999 6802:1999	Yes	Replace ref to older versions with 2008 versions
8522	<i>Wellsford Substation</i>	Condition 15	6801:1999 6802:2008	NO	Recommend Remove Condition
8523	<i>Silverdale Substation</i>	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition
8524	<i>Huapai substation</i>	Condition 13	6801:1999 6802:2008	Yes	Replace ref to older versions with 2008 versions

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8525	Henderson Substation	Condition 17	6801:1999 6802:2008	NO	Recommend Remove Condition
8526	Hepburn Road Substation	Condition 16	6801:1999 6802:2008	NO	Recommend Remove Condition
8527	Rua o te Whenua Telecommunications Facility	nil	-	-	-
8528	Massey North Underground Transmission Cable	nil	-	-	-
R8529	Mangere Substation	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition
R8530	Hobson Street Substation	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition
R8531	Wairau Road Substation	Condition 14	6801:1999 6802:2008	NO	Recommend Remove Condition
R8532	Highbrook Underground Transmission Cable	Condition 6	6801:1999 6802:2008	NO	Recommend Remove Condition

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ATTACHMENT C



Keeping the energy flowing

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13 August 2015

Harry Bhana
Director
Harry Bhana & Associates
6 Modena Crescent
Glendowie
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Dear Mr Bhana

Transpower's submission on pAUP Designations – Advice on Electric and Magnetic Fields Conditions

I am an Environmental Specialist in Transpower New Zealand Limited. I am a member of the New Zealand Government's Interagency Committee on Non-Ionising Radiation and Health and am on the joint Australia/New Zealand standards committee, TE-007 Human Exposure to Electromagnetic Fields. I am also a member of the Australian Energy Network Associations EMF Committee. I often assist the public in addressing their health concerns related to electric and magnetic field (EMF) exposure and have addressed a range of occupational exposure scenarios faced by workers on the National Grid. I have worked in this capacity at Transpower for 10 years.

I have reviewed the EMF conditions in Transpower's designations on the Proposed Auckland Unitary Plan (pAUP) and my expert opinion is that the conditions outlined below will adequately mitigate the effects of EMF emitted from the substation site or transmission line.

1. Transmission lines

1.1 Transpower seeks the following EMF condition be included as a replacement condition in relation to specific designations for transmission lines:

Condition

"Any new equipment shall be designed and operated to limit electric and magnetic field exposures to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100kHz), (Health Physics 99(6):818-836, 2010) (ICNIRP Guidelines). That is, the public exposure reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at one metre above ground level under maximum normal operating conditions (i.e. when there are no faults in the transmission system)."

1.2 This condition would replace the EMF condition in the following Transpower designations:

- 8500 (condition 2)
- 8502 (condition 3)
- 8504 (condition 2)

- 8505 (condition 2)
- 8506 (condition 2)
- 8508 (condition 2)
- 8509 (condition 2)
- 8512 (condition 7)

Reason for changes to the EMF condition

(a) *Revision of the ICNIRP guidelines*

- 1.3 The designations listed in 1.2 above refer to the International Commission on Non-Ionising Radiation Protection (ICNIRP) Guidelines “Non-ionising Radiation Protection Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4): 494-522)” (1998 ICNIRP Guidelines).
- 1.4 The ICNIRP guidelines were revised in 2010. Policy 9 of the National Policy Statement on Electricity Transmission requires that provisions dealing with electric and magnetic fields must be based on any revisions to the Guidelines.
- 1.5 Transpower seeks that the condition be amended to refer to the latest version of the ICNIRP Guidelines, i.e “the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100kHz) (Health Physics 99(6):818-836, 2010” (2010 ICNIRP Guidelines).
- 1.6 The NZ Ministry of Health confirm that the 2010 ICNIRP Guidelines are the appropriate basis for the protection of human health with regard to EMF exposures (see page 11 of the Ministry of Health booklet *Electric and Magnetic Fields and Your Health*, which deals with electric and magnetic field exposures from transmission lines). This is available on the Ministry’s web site at <http://www.health.govt.nz/publication/electric-and-magnetic-fields-and-your-health>.
- 1.7 For transmission line assets the result of the 2010 ICNIRP Guidelines revision is an increase in the general public reference level for magnetic flux density from 100 µT to 200 µT. The electric field public exposure level remains unchanged at 5 kV/m.
- 1.8 Therefore, for each of the relevant designation conditions, Transpower seeks the general public reference level for magnetic flux density be revised to 200 µT. The NZ Ministry of Health booklet *Electric and Magnetic Fields and Your Health* confirms the magnetic field public exposures reference level on page 12.

(b) *Deletion of reference to “new works”*

- 1.9 The EMF condition only needs to apply to “equipment” that is operational, and not “new works”. This is because there is no EMF associated with new works (i.e when undertaking the construction of new equipment). At the construction stage, equipment is not energised and hence no EMF is associated with the “works”.

2. Substations and switching stations

2.1 Transpower seeks the following EMF condition be included as a replacement condition in relation to specific designations for substations and switching stations:

Condition

"Any equipment shall be designed and operated to limit electric and magnetic field exposures at or beyond the secure boundary of the substation site to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100kHz) (Health Physics 99(6):818-836, 2010) (ICNIRP Guidelines). That is the public exposure reference levels of 5 kV/m for electric fields and 200 µT for magnetic flux density at one metre above ground level under maximum normal operating conditions (ie, when there are no faults in the transmission system)."

2.2 This condition would replace the EMF condition in the following Transpower designations for substations and switching stations:

- 8501 (condition 8)
- 8503 (condition 8)
- 8510 (condition 8)
- 8511 (condition 8)
- 8513 (condition 2)
- 8514 (condition 7)
- 8515 (condition 4)
- 8518 (condition 8)
- 8520 (condition 8)
- 8521 (condition 3)
- 8522 (condition 9)
- 8523 (condition 8)
- 8524 (condition 18)
- 8525 (condition 11)
- 8526 (condition 10)
- 8529 (condition 8)
- 8530 (condition 8)
- 8531 (condition 8)

Reason for changes to the EMF condition

(a) *Revision of the ICNIRP guidelines and deletion of reference to "new works"*

2.3 The reasons for the changes to the condition include those set out in paragraphs 1.3-1.9 above.

(b) *Exposures beyond the secure site boundary*

- 2.4 For designations 8501 (condition 8), 8503 (condition 8), 8510 (condition 8) and 8511 (condition 8), reference to the exposure levels applying at or beyond the secure boundary of the substation site should be added.
- 2.5 This wording is already included in all other substations designations. The wording should be added as there is no public access inside the secure boundary of the substation site and therefore it is inappropriate to apply public reference levels in this area.
- 2.6 Drury 8521 condition 4 should be removed as previously requested in Transpower's submission.
- 2.7 Drury 8521 condition 5 should be amended as follows in order that the reference is thoroughly and properly provided (the date previously provided was incorrect).

"The site shall be designed and operated to limit public exposure to electric and magnetic fields, in accordance with the recommendations in Section 1, of the World Health Organisation monograph, Environmental Health Criteria No. 238, Extremely low frequency fields June 2007"

3. Cables

- 3.1 Transpower seeks the following EMF condition be included as a replacement condition in relation to specific designations for underground cables:

Condition

"Any equipment shall be designed and operated to limit the magnetic field exposures to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100kHz) (Health Physics 99(6):818-836, 2010) (ICNIRP Guidelines). That is the public exposure reference level of 200 µT for magnetic flux density when measured at 1 metre above ground level directly above any cable under normal operating conditions (ie, when there are no faults in the transmission system)."

- 3.2 This condition would replace the EMF condition in the following Transpower designations for underground cables:

- 8507 (condition 35)
- 8516 (condition 3)
- 8517 (condition 3)
- 8519 (condition 4)
- R8532 (condition 2)

Reason for changes to the EMF condition

Revision of the ICNIRP guidelines and deletion of reference to "new works"

- 3.3 The reasons for the changes to the condition include the reasons set out in paragraphs 1.3-1.9 above.

- 3.4 For your information, due to shielding by the cable sheath, there is no electric field around an underground cable and therefore the designation conditions for cables refer only to the magnetic field public exposure reference levels.

I trust the above information is of assistance. Please do not hesitate to contact me if you have any queries.

Yours faithfully,



Matthew Walker
Environmental Specialist

ddi: 04 5906995