1. EXECUTIVE SUMMARY

1.1 Vector Limited ("Vector") welcomes the opportunity to comment on the Ministry for the Environment's ("MfE") draft first set of National Planning Standards ("Standards").

1.2 Vector sees real benefit in standardising the formatting of plans and maps, which provide greater efficiencies in the way councils and plan users interact with various plans across the country. However, the substantive provisions of the Standards could have significant unintended consequences if not appropriately drafted.

1.3 In respect of the Standards, Vector:

   (a) currently supports the inclusion of the Network Utility Standard currently being developed by the network utility operators group in a future set of standards released for consultation;

   (b) requests a number of amendments to the standards relating to district plan structure and mapping; and

   (c) supports the inclusion of mandatory definitions for 'earthworks', 'land disturbance' and 'reverse sensitivity' and supports in part the definitions of 'building' and 'functional need'.

2. VECTOR’S INTEREST IN THE STANDARDS

2.1 Vector is one of New Zealand’s largest network infrastructure companies with interests in electricity, gas, telecommunications, metering and technology. Vector's portfolio of assets performs a key role in delivering
vital services to more than one million homes and businesses across New Zealand.

2.2 Vector has an extensive history of participating in planning processes, and is a frequent user of planning instruments which are vital to the effective operation, maintenance and expansion of its vast network. Vector regularly works with councils when looking at new development and investment in its energy and fibre optic infrastructure.

2.3 The Standards must both enable Vector to serve the existing community and also provide for growth. Accordingly, careful consideration must be given to the planning framework for network utilities in order to ensure that:

(d) growth in demand can be accommodated effectively and efficiently when and where it is required;

(e) maintenance and repairs are enabled, minimising service disruptions that can cause significant social and economic adverse effects; and

(a) there are no unnecessary regulatory or compliance costs or delays imposed on the construction, operation, maintenance, and upgrading of infrastructure.

2.4 Vector provided feedback on MfE’s discussion papers for the first set of Standards in July 2017, and has been involved in the development of the draft Network Utility Standard, alongside other utility operators. Vector understands that workstream is ongoing, and the Standard may be included as part of a future set of Standards released by MfE.

3. SUBMISSION

Preliminary issue: Network Utility Standard

3.1 As detailed above, Vector has been involved in the preparation of the draft Network Utility Standard, which has not been included in this first set of draft Standards. Having been involved in the process of preparing the draft Network Utility Standard, which recognises and appropriately provides for the unique planning requirements for infrastructure, Vector currently supports the notification (and, ultimately, implementation) of the draft Network Utility Standard as part of this or a future set of draft Standards.
3.2 It is essential that planning documents appropriately recognise and provide for utility operators' infrastructure and operations. The significance of this requirement was recognised by MfE in setting up the group to prepare the draft Network Utility Standard. Vector participated in that process on the basis that its involvement would lead to better planning outcomes and appropriate provisions and recognition for its infrastructure in planning documents.

3.3 Implementation of the Network Utility Standard has the potential to contribute positively to the benefits of the Standards listed on page 12 of the Consultation Document, particularly in aligning the approaches taken by different councils, making it easier to transition between plans, and enabling more focus, time and resources to be put into local resource management issues. The potential for these benefits to be realised would not be reached if the Network Utility Standard is not implemented. Vector therefore currently supports the Network Utility Standard being incorporated in a future draft set of standards to be consulted on.

3.4 The balance of this submission addresses specific questions or standards in the draft first set.

Q1: What are your thoughts on this proposed package of planning standards? If you consider changes necessary, how would these affect the anticipated outcomes?

3.5 Vector generally supports the Standards, and can see the potential benefit for frequent plan users such as itself. In Vector's submission, a number of minor amendments are necessary in order to avoid unnecessary, unintended or inappropriate outcomes, as set out below.

Q3: Do you agree with the level of standardisation proposed in the plan structure standards?

3.6 Vector strongly supports the proposal in the Draft Introduction and General Provisions Standards to include a table of designations, heritage orders or other statutory mechanism updates (Table 9). Vector relies heavily on designations to protect its infrastructure, and considers that it is appropriate for any updates to these designations to be clearly defined in the front of plans.

3.7 Vector suggests that it would also be appropriate to include, as part of that same table, details of any outline plans of work ("OPWs"), including the associated Council recommendation. From Vector's perspective, OPWs form part of the designation documents, and often contain the level of detail
that plan users are most interested in, compared to the more broad designation conditions. Having such information recorded and easily accessible (via a link to the relevant Council electronic file) in Table 9 would make plans easier to use.

**S-DWM Draft District Wide Matters Standard**

3.8 Vector supports the inclusion of an 'Infrastructure and Energy chapter (S-IE)' in the draft District Wide Matters Standard, and generally supports the content of the Standard in respect of that chapter. However, Vector considers that the matters to be addressed in the Infrastructure and Energy Chapter at 23(a)(v) should include electricity 'storage' in addition to distribution.

3.9 The storage of electricity is an increasingly important element of ensuring security of supply to the network as battery technology improves, and it is essential that the Infrastructure and Energy chapter of any plan appropriately provides for electricity storage, in addition to the other activities.

3.10 Mandatory direction 31 of that Standard states that if matters related to managing noise and light are addressed in the plan, they must be located in a Noise and light section. However, Vector considers that this would be problematic where the noise and light effects are related to infrastructure and energy, and it would be most appropriate for those elements of noise and light management to remain with the Infrastructure and Energy chapter, rather than being cleaved off to form part of the Noise and Light section of the General District Wide Matters chapter.

3.11 Vector therefore submits that mandatory directions 24 and 31 should be amended to clarify that noise and light matters associated with infrastructure and energy must be included in the Infrastructure and Energy chapter.

**Q12: Does the mix of map colours and symbols function well for your plan(s)?**

3.12 Vector generally supports the map colours and symbols proposed. However, Vector is concerned that the zone colour palette currently proposed may, in some instances, result in difficulties interpreting the zones – particularly between low-density residential and medium-density residential, which are very similar colours.
CM-1: Draft Definitions Standard

3.13 Vector supports the proposed definitions for ‘earthworks’, 'land disturbance' and 'reverse sensitivity', and seeks that these are retained as currently drafted in the final Standards.

3.14 Vector supports the inclusion of a definition of 'building' in the Standards, but considers that the definition as currently proposed is uncertain. Vector is particularly concerned that the proposed definition could inadvertently result in its transformers or batteries being defined as 'buildings'. Vector would therefore support greater specificity in the proposed definition.

3.15 Vector considers that the definition of 'functional need' is acceptable, however the Standards should also include a definition of 'operational need' or 'operational requirement' consistent with the Auckland Unitary Plan. Including such a definition would enable plans to provide for infrastructure that has an operational need to be in a certain environment due to technical or operational characteristics or constrains, as well as providing for activities that can only occur in that environment.

Signature: VECTOR LIMITED, by its solicitors and authorised agents Russell McVeagh:

Daniel Minhinnick

Date: 17 August 2018

Address for Service: