

Western Bay of Plenty Development Plan: Major Capex Proposal long-list consultation

Specific questions

We have developed specific questions, which are throughout the consultation paper and consolidated below. These are intended to help you respond to our consultation, but you are not obliged to answer any or all of these questions and are welcome to raise other issues that are relevant to our project.

This is a downloadable template, which may be helpful for you to use.

Attachment 1 – Investment need, Regulatory process for investment approval	
Question 1	<p>Do you agree with our assessment of the need to invest in more transmission capacity to serve the Western BOP?</p> <p>Are there any other issues or considerations relating to the need that we should incorporate into the investigation?</p>
Response	<p>Yes, we agree there is a need to invest in more transmission capacity to serve the Western Bay of Plenty. Population growth in the Western Bay of Plenty is set to continue increasing, combining with an increase in electricity use there is a strong need to ensure a resilient supply of electricity to the region.</p> <p>There is a need to consider how we could work together to increase the prospect of largescale sustainable electricity generation within the region as well as the uptake of renewable electricity generation within the region, e.g., solar panels. The consultation documentation infers a very limited or 0% increase in the use of renewable energy in the region e.g., solar power.</p> <p>While we understand that Transpower and Powerco are not responsible for power generation we believe there is a role for these two distributors to play in supporting and enabling sustainable electricity supply as much as possible.</p>
Attachment 2 – Long-list of options	
Question 2	Are there any other options we should add to our long-list?
Response	<p>No we are not aware of other options that should be added to the long-list.</p> <p>From the information provided it appears that there will be a need for a combination of options. Non transmission options, e.g., new power</p>

	<p>supply generation and building new assets for transmission is of particular interest to Western Bay of Plenty District Council.</p> <p>Upgrading and enhancing existing assets where there is already infrastructure in place is less significant as there are likely to be less impacts on the community.</p> <p>We understand that the Kaimai hydro scheme is the only significant generation within the region and as stated in the long list document it already offsets peak loads at Tauranga and is not sufficient to avoid the problem. However, it would be good to understand this in further detail, e.g., is there any additional capacity in the hydro scheme to create additional supply.</p> <p>We are also keen to understand further Transpower and Powerco's role in supporting new dispatchable generation and Western Bay's role in enabling this process.</p> <p>We understand that Transpower and Powerco are incorporating inputs into the Governments NPS – Renewable Generation policies to enable and encourage small scale community renewable generation schemes including associated (or stand alone) battery storage.</p>
Question 3	Are there any other criteria we should consider when evaluating our long-list of options and reducing it to a short-list?
Response	<p>It is not clear what criteria will be used to determine the short list, e.g., the MCA has not been made available. Within attachment 2 – Long list of options, there are comments which would benefit from further explanation to understand whether the option is not valid. For example, the Substation Upgrade, line B4, Powerco have said the upgrade is impractical due to a lack of available road reserve. To improve the capacity of the substation it would seem it would be worth considering additional designation / purchase of land. Overall, it would be good to understand whether some of the options in the long-list have been further investigated to be able to be ruled out.</p>
Question 4	Are there any constraints or limitations we might not be aware of regarding any options?
Response	<p>It is not clear based on the information provided where the locations of all of the options are. Providing the location of the options on a map would be useful so that we can provide further detailed feedback on options.</p> <p>Unless there appears to be significant consenting challenges whether from a local, regional or central government level it would seem that the ideal solution for power supply / transmission / generation should be</p>

	identified and then the consenting challenges worked through on the basis that adequate power infrastructure is critical to maintaining functioning towns, populations.
Attachment 3 – Information for proponents of non-transmission solutions	
Question 5	<p>This document serves as a Request for Information for non-transmission solutions (e.g., grid scale batteries). Any submission on this aspect should provide as much detail on the NTS as possible.</p> <p>Ideally this should include:</p> <ul style="list-style-type: none"> • Sufficient technical detail to enable an assessment of the option • The number of MWs that could be made available • Detail of any market benefits • The location of where the service would be provided • The option(s) timing in terms of construction and availability.
Response	<p>Western Bay of Plenty District Council would not generally be directly involved in any non-transmission solutions. However, our District Plan encourages and enables small scale solutions such as individual or small community scale off-grid power generation as permitted activities.</p> <p>There may be some very small (inconsequential) individual projects we are not aware of at a planning level.</p> <p>There is one suggested small scale community solar scheme for a 32 lot lifestyle development.</p> <p>Western Bay of Plenty District Council require all streetlights in new subdivisions to be LED and fitted with remote controllers for future 'smart' operation.</p>
Attachment 4 - Scenarios	
Question 6	Do you agree with our proposal to use our NZGP1 EDGS variations as the basis for our market scenarios for this investigation?
Response	N/A (outside of our area of expertise).
Question 7	Are you aware of any new industrial/commercial or residential developments that will significantly impact demand that are not mentioned above? If so, what are they?
Response	<p>WBOPDC Significant Projects</p> <p>Residential:</p> <p>Plan Change 92:</p>

	<p>This plan change is in recognition of the Governments NPS-UD and subsequent MDRS legislation which enables intensification. The plan change relates to Ōmokoroa and Te Puke. Additional rules relating to infill subdivision (brownfield development) have also been introduced.</p> <p>Ōmokoroa</p> <p>Overall long term growth projection for Omokoroa: 2023 - 2028: Current population of approx. 4,900 people expected to increase to 6,800. 2028 – 2050: Population expected to be between 12,000 to 13,000 people.</p> <p>The plan change area is currently subject to two active consents: Classic Developments – 156 dwelling units developed progressively over the next 2 to 4 years.</p> <p>Omokoroa Country Club (OCC) – 153 villas, 48 apartments and a 71-bed care home to be developed over the next 5 years.</p> <p>Te Puke</p> <p>Overall longterm growth projection for Te Puke 2023 - 2032: Current population of approx. 9,700 people expected to increase to 12,500-13,000.</p> <p>Council is undertaking a spatial planning exercise for Te Puke, 'The Te Puke Spatial Plan', will determine where and to what extent growth will occur in Te Puke. The Te Puke Spatial Plan will consider in detail community aspirations as well as opportunities and constraints for the area. It is likely that the identification of new greenfield land areas for urban development will be identified. The Te Puke Spatial Plan will provide direction for any necessary plan changes to enable the outcomes of the Te Puke Spatial Plan to be achieved.</p> <p>Active large-scale consents</p> <p>North Twelve Ltd – Approved subdivision (RC13244) combined 'turnkey' housing development comprising 149 allotments with the potential for the subsequent dwelling units to exceed the number of lots with townhouse and duplex housing typologies proposed. Site is accessed via an extension to Dunlop Road. The first stage of the development is nearing completion. The number of dwelling units may reduce in the short term due to market forces.</p>
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Zest – Approved subdivision (RC13237) adjacent and to the west of the above. A combined ‘turnkey’ housing development comprising 357 allotments again with the potential for the subsequent dwelling units to exceed the number of lots with townhouse and duplex housing typologies proposed.

Minden Lifestyle Zone

This zone has been quite active since its conception with many developments now completed and built on.

Currently the only development of any significance is a recently consented 32 lot lifestyle subdivision near the top of Minden Road. This is the development that may incorporate some (private) solar energy co-generation to supplement the grid supply as mentioned in our question 5 response.

Waihi Beach

Significant developments include:

Takhar Estate – Consented 66 lot subdivision accessed from ‘The Crescent’. Thus far only earthworks have been undertaken.

Eastern Town

The development of a new town (referred to as ‘the Eastern Centre’) in the east of the Western Bay of Plenty sub-region has been proposed to respond to growth challenges in the region. This was signalled through the Urban Form and Transport Initiative (UFTI) and is identified in the draft Future Development Strategy and is also a Priority Development Area through SmartGrowth. The Eastern Centre is envisaged as a new, greenfield development of approximately 800 ha that could be home to a future population of up to 40,000 people when fully developed. Council, alongside Ministry of Housing and Urban Development are currently developing a Business Case for this project.

Industrial Development General

Rangiuru Business Park

Transpower are already aware of this industrial area as it’s included in table 2 of attachment 4.

Please be aware that 'Quayside Developments' (an investment arm of the BOP Regional Council) is actively beginning development of the first stages of Rangiuru with an approved earthworks consent as well as subdivision consent for the first stage (approx. 29 lots) and earthmoving under way.

Comvita are also developing a facility just to the south of this industrial zone.

Washer Road Te Puke

A Private Plan Change was recently approved (2022) to create additional Industrial land for Te Puke. A new roundabout is to be constructed at the intersection of Jellicoe Street and Cameron Road. Activity is low in this industrial zone however there is an active subdivision consent (RC14086) to split the land into three titles. Subdivision is often a pre-cursor to enable other activities however Council is not aware of the landowners plans in this regard.

Katikati

Council's Industrial zone in Katikati (south of Marshall Road).

Other than the activities already long established within this zone there has not been any further uptake since the zone was 'revised' around 10 – 15 years ago. However, Quayside Developments have more recently expressed an interest in pursuing development in this area.

The **SmartGrowth Strategy 2023** is a spatial planning document that considers how urban form, infrastructure, transport, community development and the environment need to be looked at together to achieve effective growth in the Western Bay of Plenty. This includes information on infrastructure. The SmartGrowth Strategy also includes a Future Development Strategy (FDS) as required by the NPS-UD. The FDS sets the high-level vision for accommodating urban growth over the long term and identifies strategic priorities to inform development related decisions such as District Plan zoning. The draft FDS as well as the broader SmartGrowth Strategy will be available on 18th September to 20 October 2023 for submissions.

Industrial Land Study (SmartGrowth). A technical report by Aurecon is now available to the public via the SmartGrowth website. This work identified future options for industrial land in the sub-region to supply

	<p>approximately 4-500ha of industrial / business land. Three 'shortlisted' sites have emerged and are centred around the Western Corridor, Pukemapu and Ōmokoroa. Note that as stated in the Aurecon report, there is further work to do in order to refine the various sites studied in the report.</p> <p>Other sources on information for reference</p> <p>SmartGrowth – Housing and Business Capacity Assessment (HBA) 2022 Summary (available on the SmartGrowth website) Western Bay, TCC and Bay of Plenty Regional Council are required to undertake a Housing and Business Capacity Assessment in response to the National Policy Statement on Urban development. The section entitled 'Housing Bottom Lines' includes a table that shows the number of new houses needed over the short, medium and long term (out to 2052). There is also information in the HBA on long term planning for future Industrial Land requirements.</p> <p>The Urban Form and Transport Initiative (UFTI) (SmartGrowth website) sets out integrated land use and transport programme and delivery plan for the Western Bay of Plenty.</p>
Question 8	Do you consider our demand assumptions appropriate for this investigation? Please provide us with any information about development in the region that doesn't appear in our document and which you consider could help inform our forecasts.
Response	Yes the demand assumptions are appropriate however, It appears that some long-term development forecasts are not listed in table 2. Please refer to our response to question 7 above.
Question 9	Are you aware of any new generation which would directly affect peak demand in the Western Bay of Plenty for this investigation? Regardless of whether is embedded or grid scale.
Response	No we are not aware of any significant new generation projects other than the possible small scale solar that may (or may not) go ahead as part of the Minden lifestyle development – see our response to question 5.
Question 10	Do you consider our generation assumptions appropriate for this investigation?
Response	Yes. However, Council is not aware of the projects as alluded to by Transpower in the General Assumptions section of attachment 4. In

	addition, we are not aware of any other new or co-generation projects in the region.
Question 11	Are our proposed scenario weightings reasonable?
Response	N/A
Question 12	What assumptions should we make when valuing the cost of not being able to supply demand (pre-contingency) because of no investment in the grid in our base case or counterfactual?
Response	This is not easily able to be answered without understanding the types of assumptions and weighting being made generally. Western Bay of Plenty District Council support the need for investment in infrastructure to ensure a continuous and resilient electricity network supply.
Attachment 5 – Investment Test parameters	
Question 13	Do you consider the proposed calculating period to 2050 appropriate for this investigation?
Response	<p>Yes this is appropriate.</p> <p>Council undertakes a range of planning processes that focus on short, medium and long term.</p> <p>Councils long term planning (LTP) looks 10 years ahead and is reviewed every 3 years.</p> <p>The Future Development Strategy as required by the National Policy Statement on Urban Development is a 30 year plan that identifies housing and business land and infrastructure. The SmartGrowth Industrial Land Study is looking 30 years ahead. The SmartGrowth Strategy itself is a 50-year plan.</p>
Question 14	Do you consider our proposed Value of Expected Unserved Energy of \$31,500/MWh to be appropriate for valuing unserved energy?
Response	Western Bay of Plenty District Council support the need for investment in infrastructure to ensure a continuous and resilient electricity network supply.
Question 15	Do you consider a discount rate of 5% (with sensitivities of 3% and 7%) to be appropriate for this investigation?
Response	This is not easily able to be answered without understanding the types of assumptions and weighting being made generally. Western Bay of Plenty District Council support the need for investment in infrastructure to ensure a continuous and resilient electricity network supply.

Question 16	Are there other market costs or benefits which should be reflected in our Investment Test analysis?
Response	It is not clear what is being included in the investment test analysis. A 'wellbeing' approach e.g., economic, social, cultural and environmental analysis should be being applied to the test analysis to ensure that all aspects of our communities are being considered.