

SECTION 32AA EVALUATION REPORT

Topic: Network Utilities

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Dated: 26 November 2024

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1. Introduction

This section 32AA evaluation relates to the recommended amendments following consideration of the evidence filed on behalf of submitters.

A section 32AA evaluation is only required for changes recommended since notification; if there is no change to the notified version, a section 32AA evaluation is not required. The level of detail in this report needs to be at a level of detail that corresponds to the scale and significance of the changes recommended.

1.1 Format of the report

The section 32AA evaluation report is structured in a similar order to the provisions in the Network Utility chapter to enable the report and chapter to be read together. In accordance with the requirements of section 32, the tests for objectives are different from provisions.

The matters addressed by this s32AA evaluation report are:

1. New objective for the gas transmission network
2. Amendments to NU-O4 regarding the transport network
3. Recognising the limitations for network utilities to minimise adverse effects (amendments to NU-P9 and NU-P10)
4. Management of network utility structures in an overlay:
 - a. Deletion of NU-P11
 - b. Change in activity status in NU-R4 for new and extended or upgraded access tracks in Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites
 - c. Amendments to the activity status for electricity generators and self-contained power units for the supply of a network utility
 - d. Amendments to NU-R12 for temporary network utilities
 - e. Amendments to NU-R14 for upgrading including realignment of existing underground network utilities
 - f. Amendments to the activity status for NU-R33
 - g. Inclusion of an additional rule for the National Grid to NU-R37
5. New policy for network utilities in natural hazard overlays

6. Inclusion of equipment in NU-R19
7. Inclusion of an additional matter of discretion for NU-R32
8. Deletion of a standard for upgrading including realignment of existing underground network utilities (NU-R43)
9. Vehicle access points for network utilities (NU-R47)

2. New objective for the gas transmission network

2.1 Appropriateness of Objectives

The objective is to recognise the regional significance of the gas transmission network.

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | <p>The gas transmission network consists of the physical structures that provide essential gas for people and industries through the District, and beyond. The recognition of the gas transmission network as a physical resource is critical to the District's economic productivity, environmental outcomes and wellbeing of the community. The benefits of this infrastructure to the functioning of the district are therefore substantial.</p> <p>A secure gas transmission network is vital to the functioning of the District. It enables people and communities to provide for their social, economic and cultural wellbeing.</p> <p>The recognition and protection of the gas transmission network is fundamental to both present and future communities. In this respect the objective of the proposal achieves this part of Section 5 (s5(2)(a)) sustain the potential of natural and physical resources to meet needs of future generations). It also achieves Section 5(2) which seeks to enable people and communities to provide for their social, economic and cultural well-being.</p> <p>Protecting the gas transmission network from activities in close proximity ensures the health and safety of people and communities in accordance with Section 5(2) of the Act.</p> <p>This Objective is consistent with and achieves Section 5(2)(c) of the RMA.</p> |

3. Amendments to NU-O4 regarding the transport network

3.1 Appropriateness of Objectives

The objective of the proposal is to recognise both existing and planned land use and development.

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | The changes to the objective will achieve section 5 by accounting for the reasonably foreseeable needs of future generations. The amendments seek to integrate the transport network with land use and thus enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety in accordance with section 5(2). The amendments constitute an efficient use of the transport network by futureproofing its design. |

This is considered the most appropriate objective to meet the purpose of the Act.

4. Recognising the limitations for network utilities to minimise adverse effects

This section addresses the recommended amendments to NU-P9 and NU-P10.

4.1 Appropriateness of Objectives

The objective of the proposal is to recognise there are limited ways to minimise adverse effects of network utilities structures, given the operational and functional needs of and that.

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | <p>Network utility structures are essential for the social, economic and cultural wellbeing of the community. They are critical to the District's economic productivity, environmental outcomes and wellbeing of the community. The benefits of infrastructure to the functioning of the district are therefore substantial.</p> <p>Connected and reliable infrastructure is vital to the functioning of the District. It enables people and communities to provide for their social, economic and cultural wellbeing in accordance with Section 5(2) of the Act.</p> <p>The efficient development of the physical resources of infrastructure is fundamental to both present and future communities. In this respect the Objective achieves Section 5(2)(a) of the Act.</p> <p>Avoiding, remedying or mitigating any adverse effects of network utilities in accordance with s5(2)(c) is relevant. The objective of the proposal is focused on managing adverse effects of network utilities.</p> <p>This is considered the most appropriate objective to meet the purpose of the Act.</p> |

4.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Retain the notified version of NU-R9(1) and NU-P10 as notified which requires any adverse effects to be minimised

Option 2 – Amend NU-R45(1) and NU-P10 to recognise that there are operational and functional limitations to the ability of network utilities to minimise adverse effects

Preferred Option

Option 2 is the preferred option as it recognises that network utilities are limited in the practical ways they can minimise adverse effects. The scale, form and location of structures is dictated by the operational and functional requirements of the network utility.

4.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|---|--|--|
| | Costs | Benefits |
| Environmental | There may be adverse environmental effects associated with height, bulk and location of the structure | Any adverse environmental effects are still required to be minimised to the smallest amount reasonably practicable |
| Economic | No economic costs are identified for this option. | Reduced cost for network utility operators in needing to redesign their structures or locate them in sub-optimal locations |
| Social | No social costs are identified for this option. | No social benefits are identified for this option. |
| Cultural | No cultural costs are identified for this option. | No cultural benefits are identified for this option. |
| | | |
| Economic growth provided or reduced | While additional network utilities structures support economic growth, they do not create economic growth. | |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. | |

| | |
|---|--|
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. |
| Risk of acting or not acting | There is sufficient information to act. |
| Effectiveness | |
| Option 2 is the most effective option as it recognises at a policy the constraints for network utility structures. | |
| Efficiency | |
| Option 2 is the most efficient option as it requires the least changes to the PDP. | |
| Summary | |
| <p>Option 2 is the most effective and efficient option for achieving the objectives of the proposal. This approach will assist in achieving the following objective of the PDP:</p> <p>NU-O1. Effective, resilient, efficient and safe network utilities</p> <p>The recommended approach will:</p> <ol style="list-style-type: none"> 1. enable essential and secure services, including in emergencies; 2. facilitate local, regional, national, or international connectivity; 3. contribute to the economy; 4. integrate with development, infrastructure and other activities; and 5. enable people and communities to provide for their health, safety and wellbeing by enabling connectivity. <p>NU-O2. The adverse effects of network utilities on the environment are avoided, remedied or mitigated whilst recognising the positive effects and functional and operational needs of network utilities.</p> <p>The amendment recognises that there are operational and functional requirements for network utilities and therefore they may be limited in their ability to minimise adverse effects.</p> | |

5. Management of network utility structures in an overlay

This evaluation addresses the following recommended amendments:

- a. Deletion of NU-P11
- b. Change in activity status in NU-R4 for new and extended or upgraded access tracks in Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites
- c. Amendments to the activity status for electricity generators and self-contained power units for the supply of a network utility
- d. Amendments to NU-R12 for temporary network utilities
- e. Amendments to NU-R14 for upgrading including realignment of existing underground network utilities
- f. Amendments to the activity status for NU-R33
- g. Inclusion of an additional rule for the National Grid in NU-R37

5.1 Appropriateness of Objectives

The objective of the proposal is to provide a succinct policy and rule framework for the section 6 overlays that gives effect to the higher order planning documents.

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | Protection of the section 6 matters are critical to achieving the purpose of the RMA. The objective of the proposal will achieve section 5(2)(a) which is sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations. |

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 6 | All of the section 6 matters are relevant to the objective of the proposal. Section 6 matters are represented spatially by overlays on the PDP maps. The objective of the proposal will mean that the matters of national importance are recognised and provided for. |

5.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Retain NU-P11

Option 2 – Delete NU-P11 and rely on the policies in the District-wide chapters

Option 3 – Retain the activity status as notified for network utilities in overlays

Option 4 – Amend the activity status for network utilities in overlays to reflect the sensitivity of the site or feature

Preferred Option

A combination of Option 2 and Option 4 is preferred. The values, qualities and characteristics of overlays, scheduled sites and features will need to be considered when proposing new infrastructure or undertaking significant upgrades. The most appropriate approach is to rely on those policies specific to the overlay in question.

Option 4 requires amending the activity status of network utilities in overlays to reflect the sensitivity of the overlay and effect of development on its values.

5.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|--|---|---|
| | Costs | Benefits |
| Environmental | No environmental costs are identified for this option. | No environmental benefits are identified for this option. |
| Economic | No economic costs are identified for this option. | No economic benefits are identified for this option. |
| Social | No social costs are identified for this option. | No social benefits are identified for this option. |
| Cultural | No cultural costs are identified for this option. | No cultural benefits are identified for this option. |
| | | |
| Economic growth provided or reduced | This option will not have any effect on economic growth. | |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. | |
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. | |
| Risk of acting or not acting | There is sufficient information to act. | |
| Effectiveness | | |
| Deleting NU-P11 will be effective in ensuring that the values, qualities and characteristics of overlays, scheduled sites and features when proposing new infrastructure or undertaking significant upgrades to existing infrastructure. | | |
| Amending the activity status in some rules reflects the sensitivity of the site or feature. | | |
| Efficiency | | |

| |
|--|
| <p>Deleting NU-P11 is a more efficient approach as it avoids duplication of policies and enables the policies in the District-wide chapters to manage network utilities within those overlays.</p> <p>The activity status aligns with the direction of the policies.</p> |
| Summary |
| <p>Having considered the costs and benefits, the benefits outweigh the costs. Deleting NU-P11 avoids duplication.</p> <p>Including a separate rule for the National Grid gives better effect to the NPSET.</p> |

6. New policy for network utilities in natural hazard overlays

6.1 Appropriateness of Objectives

The objective of the proposal is to manage network utilities in natural hazard overlays.

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | <p>Network utilities comprise of the physical structures that provide essential infrastructure through the District, and beyond. Network utilities are critical to the District's economic productivity, environmental outcomes and wellbeing of the community.</p> <p>It enables people and communities to provide for their social, economic and cultural wellbeing.</p> <p>The recognition of network utilities that need to locate in areas subject to natural hazards is fundamental to both present and future communities. In this respect the objective of the proposal achieves this part of Section</p> |

| Evaluation of objectives | |
|---|---|
| Part 2 RMA | Comment |
| | <p>5 (s5(2)(a)) sustain the potential of natural and physical resources to meet needs of future generations). It also achieves Section 5(2) which seeks to enable people and communities to provide for their social, economic and cultural well-being.</p> <p>This Objective is consistent with and achieves Section 5(2)(c) of the RMA.</p> |
| Section 6 Matters of national importance | Section 6(h) the management of significant risks from natural hazards is relevant. Some network utility structures have an operational and functional need to be in that location, but this needs to be balanced by the risk to those structures from natural hazards. |

6.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Rely on the policies in the Natural Hazards chapter

Option 2 – Include a new policy to guide new network utilities locating in a natural hazard overlay

Preferred Option

Option 2 is the preferred option. It sets out a clear policy framework for the network utilities that have a need to be located in natural hazard overlays, whilst giving effect to the RPS.

6.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|---|--|---|
| | Costs | Benefits |
| Environmental | Potential for exacerbation of damage in the event of a natural hazard event | No environmental benefits identified for this option. |
| Economic | Costs associated with any damage to the structure or the network Extra costs in the design to withstand natural hazard events | Economic benefits associated with a network that is located in the optimal location |
| Social | Communities may be isolated in the event of a natural hazard event | Social benefits associated with a functional network |
| Cultural | No cultural costs identified for this option. | No cultural benefits are identified for this option. |
| | | |
| Economic growth provided or reduced | This option will not have an effect on economic growth, although network utilities support economic growth. | |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. | |
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. | |
| Risk of acting or not acting | There is sufficient information to act. | |
| Effectiveness | | |
| The amended policy will be highly effective in providing a policy pathway for enabling network utilities in natural hazard overlays. It is tailored to recognise the situations where network utility | | |

| |
|--|
| structures are appropriate. For example, due to their function, stormwater pipes must be located within the coastal hazard overlay. |
| Efficiency |
| This is an efficient approach as it recognises that network utility structures may be appropriate in natural hazard overlays and provides a bespoke policy framework. |
| Summary |
| Having considered the costs and benefits, the benefits outweigh the costs and the new policy will be effective in achieving NU-O1, NU-O2, NU-O4 and NU-O5 of the Plan. |

7. Inclusion of equipment in NU-R19

7.1 Appropriateness of Objectives

The objective of the proposal is to enable telecommunications equipment.

| Evaluation of objectives | |
|--------------------------|--|
| Part 2 RMA | Comment |
| Section 5 Purpose | <p>Network utilities comprise of the physical structures that provide essential infrastructure through the District, and beyond. Network utilities are critical to the District's economic productivity, environmental outcomes and wellbeing of the community.</p> <p>It enables people and communities to provide for their social, economic and cultural wellbeing.</p> |

This is considered the most appropriate objective to meet the purpose of the Act.

7.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Retain the notified version of NU-R19

Option 2 – Amend NU-R19 to apply associated “equipment”.

Preferred Option

Option 2 is the preferred option as it recognises that equipment is required to support new overhead lines.

7.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|---|---|--|
| | Costs | Benefits |
| Environmental | The rule may enable increased clutter from structures where overhead lines are a permitted activity | No environmental benefits are identified for this option. |
| Economic | No economic costs are identified for this option. | Reduced cost for telecommunications and electricity companies as they do not need separate consents for associated equipment |
| Social | No social costs are identified for this option. | Supports the strength and coverage of the telecommunications and electricity network which has social benefits. |
| Cultural | No cultural costs are identified for this option. | No cultural benefits are identified for this option. |
| | | |

| | |
|---|--|
| Economic growth provided or reduced | While additional telecommunication and electricity structures and coverage supports economic growth, it does not create economic growth. |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. |
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. |
| Risk of acting or not acting | There is sufficient information to act. |
| Effectiveness | |
| Option 2 is the most effective option as it does not unreasonably restrict the placement of supporting equipment. | |
| Efficiency | |
| Option 2 is the most efficient option as it enables the equipment to support new overhead lines. | |
| Summary | |
| <p>Option 2 is the most effective and efficient options for achieving the objectives of the proposal. This approach will assist in achieving the following objective of the PDP:</p> <p>NU-O1. Effective, resilient, efficient and safe network utilities</p> <p>The recommended approach will:</p> <ol style="list-style-type: none"> 1. enable essential and secure services, including in emergencies; 2. facilitate local, regional, national, or international connectivity; 3. contribute to the economy; 4. integrate with development, infrastructure and other activities; and 5. enable people and communities to provide for their health, safety and wellbeing by enabling connectivity. | |

8. Inclusion of an additional matter of discretion for NU-R32

8.1 Appropriateness of Objectives

The objective of the proposal is to ensure consultation with Waka Kotahi for signs that require resource consent.

| Evaluation of objectives | |
|--------------------------|--|
| Part 2 RMA | Comment |
| Section 5 Purpose | <p>The state highway network is critical for enabling people and communities to provide for their needs. It enables transport of goods, which is needed for every industry as well as communities. It allows people to travel efficiently.</p> <p>The objective ensures the safe and effective operation of the state highway network, and achieves s 5(2) of the RMA.</p> |

This is considered the most appropriate objective to meet the purpose of the Act.

8.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Retain the notified version of NU-R32

Option 2 – Amend NU-R32 to include an additional matter of discretion where signs are visible from the state highway.

Preferred Option

Option 2 is the preferred option as it ensures Waka Kotahi is consulted where signs are visible from the state highway network. It ensures that any adverse effects on the operation or users of the state highway are considered.

8.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|---|---|---|
| | Costs | Benefits |
| Environmental | No environmental costs are identified for this option. | Ensures the safe operation of the state highway by reducing the chance of driver distraction. |
| Economic | Additional costs for consent applicants | No environmental benefits are identified for this option. |
| Social | No social costs are identified for this option. | Supports the safe operation of the state highway network |
| Cultural | No cultural costs are identified for this option. | No cultural benefits are identified for this option. |
| | | |
| Economic growth provided or reduced | The recommended amendments will have no effect on economic growth. | |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. | |
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. | |

| | |
|--|---|
| Risk of acting or not acting | There is sufficient information to act. |
| Effectiveness | |
| Option 2 is the most effective option as it ensures that effects on the state highway network are considered. | |
| Efficiency | |
| Option 2 is the most efficient option as it does not impose unreasonable requirements on consent applicants. | |
| Summary | |
| <p>Option 2 is the most effective and efficient options for achieving the objectives of the proposal. This approach will assist in achieving the following objective of the PDP:</p> <p>NU-O1. Effective, resilient, efficient and safe network utilities</p> <p>The recommended approach will:</p> <ol style="list-style-type: none"> 1. enable essential and secure services, including in emergencies; 2. facilitate local, regional, national, or international connectivity; 3. contribute to the economy; 4. integrate with development, infrastructure and other activities; and 5. enable people and communities to provide for their health, safety and wellbeing by enabling connectivity. | |

9. Deletion of a standard for upgrading including realignment of existing underground network utilities (NU-R43)

9.1 Appropriateness of Objectives

The objective of the proposal is to enable upgrading and realignment of underground network utilities.

| Evaluation of objectives | |
|---|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | <p>Infrastructure consists of the physical structures and networks that support and provide essential services to the communities of the district. The efficient use and management of infrastructure as a physical resource is critical to the District's economic productivity, environmental outcomes and wellbeing of the community. The benefits of infrastructure to the functioning of the district are therefore substantial.</p> <p>Connected and reliable infrastructure is vital to the functioning of the District. It enables people and communities to provide for their social, economic and cultural wellbeing in accordance with Section 5(2) of the Act.</p> <p>The efficient development, maintenance and operation of the physical resources of infrastructure is fundamental to both present and future communities. In this respect the Objective achieves Section 5(2)(a) of the Act.</p> <p>The continuing use of infrastructure through enabling the operation, maintenance and development enables people and communities to provide for their health and well-being in accordance with Section 5(2) of the Act. An example is the electric distribution network which enables people to stay warm and cook, and therefore stay healthy.</p> <p>This is considered the most appropriate objective to meet the purpose of the Act.</p> |
| Section 6 Matters of national importance | <p>Section 6 matters are relevant because the rule permits underground network utilities in some areas covered in section 6 (other than outstanding natural features, sites and areas of significance to Māori and significant archaeological sites which is a restricted discretionary activity).</p> |

This is considered the most appropriate objective to meet the purpose of the Act.

9.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Retain the notified version of NU-R43

Option 2 – Delete the requirement for the upgrading or realignment to be within 5m of the existing alignment or location.

Preferred Option

Option 2 is the preferred approach as the standard is more onerous than it would be to install a new underground network.

9.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|---|--|--|
| | Costs | Benefits |
| Environmental | There may be effects associated with the relocation or realignment of underground network utilities. | Reduces the environmental effects by encouraging upgrading of an existing structures as opposed to installation of a completely new one. |
| Economic | No economic costs are identified for this option. | <p>It enables flexibility and upgrading of existing network utilities</p> <p>Supports the strength and coverage of the network which has economic benefits.</p> <p>Reduced cost for network utility companies</p> <p>Allows relocation which supports an optimised network</p> |

| | | |
|---|---|--|
| Social | No social costs are identified for this option. | No social benefits are identified for this option |
| Cultural | No cultural costs are identified for this option. | No cultural benefits are identified for this option. |
| | | |
| Economic growth provided or reduced | While upgrading network utility structures and coverage supports economic growth, it does not create economic growth. | |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. | |
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. | |
| Risk of acting or not acting | There is sufficient information to act. | |
| Effectiveness | | |
| Option 2 is the most effective option as it does not unreasonably restrict the placement of existing underground structures. | | |
| Efficiency | | |
| Option 2 is the most efficient option as it enables development of the network without the need for resource consent. | | |
| Summary | | |
| Option 2 is the most effective and efficient options for achieving the objectives of the proposal. This approach will assist in achieving the following objective of the PDP: | | |
| NU-O1. | Effective, resilient, efficient and safe network utilities | |
| The recommended approach will: | | |
| 1. enable essential and secure services, including in emergencies; | | |
| 2. facilitate local, regional, national, or international connectivity; | | |

3. contribute to the economy;
4. integrate with development, infrastructure and other activities; and
5. enable people and communities to provide for their health, safety and wellbeing by enabling connectivity.

10. Vehicle access points for network utilities

10.1 Appropriateness of Objectives

The objective of the proposal is to tailor the parking and access standards appropriate to network utilities.

| Evaluation of objectives | |
|--------------------------|---|
| Part 2 RMA | Comment |
| Section 5 Purpose | As set out above, infrastructure consists of the physical structures and networks that support and provide essential services to the communities of the district. The purpose of the objective is to use natural and physical resources efficiently (also relates to section 7(b)). |

This is considered the most appropriate objective to meet the purpose of the Act.

10.2 Identification of Options to Achieve the Objective

The following reasonably practicable options have been identified to achieve the objective.

Option 1 – Retain the notified version of NU-R47

Option 2 – Amend NU-R47 to recognise that network utilities may not have staff, and therefore different access and parking requirements.

Preferred Option

Option 2 is the preferred option as it does not require unnecessary access and parking.

10.3 Evaluation of Preferred Option Against Objective

This section contains an evaluation of the preferred option identified above.

| Evaluation of Preferred Option Against Objective(s) | | |
|---|---|---|
| | Costs | Benefits |
| Environmental | No environmental costs are identified for this option. | No environmental benefits are identified for this option. |
| Economic | No economic costs are identified for this option. | Avoids unnecessary costs for the network utility operator |
| Social | No social costs are identified for this option. | No social benefits are identified for this option. |
| Cultural | No cultural costs are identified for this option. | No cultural benefits are identified for this option. |
| | | |
| Economic growth provided or reduced | This option does not create economic growth. | |
| Employment opportunities | This option is unlikely to result in additional employment opportunities. | |
| Uncertain or insufficient information | There is sufficient information to support the proposed changes. | |
| Risk of acting or not acting | There is sufficient information to act. | |
| Effectiveness | | |

Option 2 is the most effective option as it does not unreasonably require parking and vehicle access points.

Efficiency

Option 2 is the most efficient option as it avoids additional cost for unnecessary parking and access.

Summary

Option 2 is the most effective and efficient options for achieving the objectives of the proposal. It avoids unnecessary costs for the network utility operator.