



TRANSPOWER

Keeping the energy flowing

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2 December 2014

Queenstown Lakes District Council
Private Bag 50072
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Delivered by email to: julia.chalmers@qldc.govt.nz

Dear Julia,

**HEARING STATEMENT – QUEENSTOWN LAKES DISTRICT COUNCIL PLAN
CHANGE 49 – EARTHWORKS**

I write regarding the above Plan Change and the public hearing to be held on 3-5 December 2014. Given Transpower's limited submission points on this topic we will not be attending the hearing. Please confirm receipt of this letter and ensure this letter is tabled at the hearing.

The following National Grid assets are located within the Queenstown-Lakes District:

- Frankton Substation (FKN) (designation number 1)
- Cromwell – Frankton A (CML-FKN-A) 110 kV high voltage transmission line on towers.

I have reviewed the Section 42A Officer report and note that it is recommended the majority of the relief Transpower sought is accepted, or accepted in part (in regards to the District Plan maps). Transpower supports these recommendations by the Section 42A Officer.

In its submission Transpower sought that all references to the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) be corrected and that the CML-FKN-A National Grid transmission line be shown on the District Plan maps.

Transpower also sought that Rule 22.3.2.3(a) be retained as notified; Rule 22.3.2.3(c) be deleted; Rule 22.3.2.3(d) be amended; and that Site Standard 23.3.3 viii be deleted and replaced with a new Site Standard as follows:

viii Cromwell - Frankton A National Grid Electricity Line

- (a) Any Earthworks, Cleanfill or Mining Activity within 12m of a support structure (tower) or within 12m of the centreline of the Cromwell - Frankton A line shall not:
- (i) Exceed a depth of 300mm within 12m of any National Grid support structure (tower) foundation
- (ii) Compromise the stability of a National Grid support structure; and
- (iii) Result in a reduction in the ground to conductor clearance distances below what is required by Table 4 of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34: 2001).

Provided that the following are exempt from point (a)(i) above:

- Earthworks for a Network Utility within a transport corridor, as part of a transmission activity, or for electricity infrastructure (including generation infrastructure); or
- Earthworks undertaken as part of agricultural or domestic cultivation, or repair, sealing or resealing of a road, footpath, driveway or farm track.

Since lodging our original submission Transpower has become aware that the Site Standard does not provide for rural fences, or horticultural structures, and seeks a further addition to the exemptions as follows (**highlighted** below):

Provided that the following are exempt from point (a)(i) above:

- Earthworks for a Network Utility within a transport corridor, as part of a transmission activity, or for electricity infrastructure (including generation infrastructure); or
- Earthworks undertaken as part of agricultural or domestic cultivation, or repair, sealing or resealing of a road, footpath, driveway or farm track.
- **Vertical holes not exceeding 500mm in diameter are exempt provided they:**
 - i. more than 1.5m from the outer edge of pole support structure or stay wire; or**
 - ii. are a post hole for a farm fence or horticulture structure and more than 5m from the visible outer edge of a tower support structure foundation.**

Transpower also sought to include a new non-complying Rule 22.3.2.5(c) as follows:

Cromwell - Frankton A National Grid Electricity Line

(c) Any earthworks, cleanfill or mining activity which do not comply with Site Standard 22.3.3 viii (a)(ii) or 22.3.3 viii (a)(iii).

The Section 42A Officer Report recommends that this relief is rejected.

Transpower considers that the non-complying rule is necessary as Transpower should be considered an affected party for any earthworks that breach the Site Standard 22.3.3 viii (a)(ii) and (iii).

Any earthworks that breach these rules will undermine the operation of the line. There is only one transmission line going into Queenstown and if this is undermined could result in an outage for Queenstown and the wider district. Transpower could not support an activity that breaches these rules.

A breach of the minimum ground to conductor clearance distances is also illegal under the Electricity (Safety) Regulations 2010.

Transpower considers that the non-complying activity status for these rules should be provided as it sends a clear message that a breach of these permitted activity rules should not be supported and are likely to be opposed by Transpower. It is accepted that there may be some instances when Site Standard 22.3.3 viii (a)(i) is not complied with but the activity does not compromise the line.

Should you require clarification of any matter, please contact me (04 590 7434) or Joanne Mooar, Regulatory Environment Team Leader, (04 590 6060) or alternatively we can both be contacted on environment.policy@transpower.co.nz.

Yours sincerely



Sarah Shand
Environmental Planner