

**Appendix A – Submission by Transpower New Zealand Limited on the
Proposed Queenstown Lakes District Plan – 23 October 2015**

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23 October 2015

Keeping the energy flowing



Submission on the Proposed Queenstown Lakes District Plan under Clause 6 of Schedule 1, Resource Management Act 1991

To Queenstown Lakes District Council (Council)
Name of submitter: Transpower New Zealand Limited (Transpower)

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network (the National Grid) that carries electricity across the country. It connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses.

The National Grid includes towers, poles, lines, cables, substations and ancillary infrastructure in the jurisdiction of Queenstown Lakes District Council. The role of the National Grid is to enable New Zealand to achieve its international and local aspirations¹. The National Grid is critically important infrastructure that is necessary for a reliable and secure supply of electricity throughout the country.

Transpower is making this submission in accordance with Clause 6 of Schedule 1, Resource Management Act 1991.

Transpower could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that this submission relates to are:

Transpower's submission is in relation to the following aspects of the Proposed Queenstown Lakes District Plan:

- Chapter 1 – Introduction
- Chapter 2 – Definitions
- Chapter 3 – Strategic Direction
- Chapter 4 – Urban Development
- Chapter 5 – Tangata Whenua
- Chapter 6 – Landscapes
- Chapter 7 – Low Density Residential
- Chapter 8 – Medium Density Residential
- Chapter 9 – High Density Residential
- Chapter 21 – Rural
- Chapter 23 – Gibbston Character Zone
- Chapter 27 – Subdivision and Development
- Chapter 28 – Natural Hazards
- Chapter 30 – Energy and Utilities
- Chapter 33 – Indigenous Vegetation and Biodiversity
- Chapter 37 - Designations
- Planning Maps

¹ Transpower's Statement of Corporate Intent for July 2012 to June 2015.

The specific details of Transpower's submission, and decisions sought in relations to the provisions contained in the chapters above, are contained in the attached table. The relief that Transpower is seeking will give effect to the National Policy Statement on Electricity Transmission 2008 (NPSET).

1 Executive Summary

The National Grid is nationally (and regionally) significant infrastructure which is recognised within an RMA context by the National Policy Statement on Electricity Transmission 2008 (NPSET) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA).

The Proposed Queenstown Lakes District Plan (Proposed Plan) is required, among other things, to:

- (a) give effect to the provisions of the NPSET; and
- (b) not be in conflict with nor duplicate the provisions of the NESETA.

Transpower acknowledges Council's intent to meet the above obligations and supports the general approach taken, in particular the consultation with Transpower in the earlier stages of the District Plan Review.

However, Transpower considers some amendments to the Proposed Plan are required in order to discharge its statutory responsibilities under the NPSET and NESETA. As currently proposed, Transpower considers that in some instances the Proposed Plan does not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of other available means and therefore are not appropriate in terms of section 32 of the RMA. On this basis, Transpower does not consider the requirements of section 32 of the RMA have been met.

This submission outlines necessary amendments to the Proposed Plan to meet the above statutory requirements.

2 Background: The National Grid

The National Grid extends from Kaikohe in the North Island to Tiwai Point in the South Island, and in doing so links electricity generators to distribution companies and major industrial users throughout New Zealand. To achieve these linkages, the National Grid comprises some 12,000km of transmission lines and cables and 167 substations across the country. The National Grid also includes a telecommunications network of approximately 300 telecommunication sites, which connects and controls the components (including substations) that make up the National Grid.

The National Grid is nationally significant infrastructure that plays an essential role in maintaining reliability and security of supply of energy and supports New Zealand's national and regional economic growth. It is important to acknowledge that Transpower's role is distinct from electricity generation or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies which supply electricity to everyday users. These users may be a considerable distance from the point of generation. As a result, the National Grid traverses District and Regional Council boundaries. A large portion of the electricity generated in the lower South Island is transmitted northwards. In some cases, major users of electricity will directly connect to the National Grid.

Transpower is committed to ensuring that the National Grid continues to meet the needs of its users both in the short and in the long term. It is important that existing National Grid infrastructure is allowed to be operated, maintained, upgraded and developed in an efficient and effective manner in order to ensure that these expectations are met. In order for this to occur it is crucial that development under the lines and around other National Grid infrastructure is appropriately managed to ensure continued access to these assets.

Transpower's 30 year strategy for future development of the National Grid is set out in 'Transmission Tomorrow'. This document outlines the view that there will be an on-going role for the National Grid, and that the lines and substations Transpower owns and operates will be required into the future. As such, it is important that the existing transmission corridors are protected and maintained. Conversely, it is important that where new infrastructure is required, this is recognised and provided for.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, and the Electricity (Hazards from Trees) Regulations 2003.

3 Transpower's Assets in the Queenstown Lakes District

Transpower, as the owner and operator of the National Grid, has a significant interest in the Queenstown Lakes District. This interest includes transmission lines, substations and associated infrastructure that traverse the District in order to supply electricity to the Queenstown Lakes District as well as transmit electricity across the broader Otago Region and the rest of New Zealand.

Transpower's assets within the Queenstown Lakes District are:

- The Cromwell - Frankton A (CML-FKN-A) 110kV overhead transmission line. The 40.8km long transmission line is located on 136 double circuit steel towers, of which 86 are located in the Queenstown Lakes District², and was commissioned in 1976; and
- The Frankton Substation located at 93 Frankton-Ladies Mile Highway, Frankton. The substation has a total site area of 2.4559 hectares.

The Frankton substation is subject to a designation that Transpower request be "rolled-over" as part of the Plan Review process (clause 4 of the First Schedule of the RMA).

Appendix A of this submission contains a map showing the location of the National Grid assets within the Queenstown Lakes District.

4 Otago Regional Policy Statement

Otago Regional Council (ORC) has recently released their Proposed Otago Regional Policy Statement with hearings to commence in November 2015. Transpower has been heavily involved in the RPS process, providing guidance and submissions to ORC to ensure that the RPS gives effect to the NPSET and does not conflict with the NESETA.

By way of an overarching comment on the entire Queenstown Lakes District Plan, Council needs to ensure that the District Plan is consistent with the Otago RPS. As directed by section 75(3)(c) of the RMA, the District Plan must give effect to the Otago RPS. The Proposed RPS makes the National Grid a clear priority within the Otago region as this network is nationally and regionally significant infrastructure.

² There are four terminations structures on the CML-FKN A line and 5 earthwires.

In particular, Objective 3.4 and its underlying policies (Policies 3.4.1 – 3.4.4) recognise that the region requires good quality infrastructure to meet community needs and recognises that infrastructure corridors, such as the National Grid, require protection from adverse effects, including reverse sensitivity effects, both now and in the future. Objective 3.5 and Policy 3.5.1 recognise that the National Grid is of regional and national significance whilst Policy 3.5.3 is dedicated to protecting infrastructure of national and regional significance from adverse effects. Transpower considers that Council needs to take more direction from the Proposed RPS as this provides a good framework to give effect to the NPSET, although it is noted that the RPS requires amendments in order to give full effect to the NPSET.

5 Resource Management Act and the National Grid

The national significance of the National Grid is recognised, in an RMA context, by the NPSET³ and the NESETA⁴. These documents apply only to the National Grid, and do not apply to local electricity distribution networks, nor lines owned and operated by generators.

5.1 National Policy Statement on Electricity Transmission 2008

The NPSET was gazetted on 13 March 2008 and confirms the national significance of the National Grid and provides policy direction in relation to:

- Recognising the benefits of National Grid transmission;
- Managing the environmental effects of the National Grid;
- Managing the adverse effects of third parties on the National Grid; and
- Long term strategic planning for transmission assets.

A key reason for introducing the NPSET in 2008 was to resolve the inconsistencies that resulted from the variable provision for the National Grid in RMA plans and policy statements. This variance was despite the fact that the National Grid is largely the same across the country. In promoting the NPSET, central government accepted the importance and benefits of a nationally consistent approach to decisions on transmission activities. The RMA amendment to Regulation 10 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003⁵, by inserting section 2(i) further acknowledges the importance of the National Grid by requiring Transpower to be served notice of applications or reviews that may affect the National Grid.

The single objective of the NPSET is as follows:

“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *Managing the adverse environmental effects of the network; and*

³ <http://www.mfe.govt.nz/publications/rma/nps-electricity-transmission-mar08/nps-electricity-transmission-mar08.html>

⁴ http://www.legislation.govt.nz/regulation/public/2009/0397/latest/DLM2626036.html?search=qs_act%40bill%40regulation%40deemedreg_electricity+transmission_resel_25_h&p=1

⁵ Resource Management (Forms, Fees, and Procedure) Amendment Regulations (No 2) 2006

- *Managing the adverse effects of other activities on the network.* “

The NPSET objective is supported by 14 Policies. In a general sense these policies address the following:

- Policy 1: Recognising the benefits of the National Grid;
- Policy 2: Recognising and providing for the effective operation, maintenance, upgrading and development of the National Grid;
- Policies 3 to 5: Weighing the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;
- Policies 10 and 11: Managing adverse effects on the National Grid and providing for “buffer corridors”;
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Section 75(3) of the RMA requires a District Plan to give effect to a National Policy Statement (NPS). The Supreme Court recently considered what is meant by the phrase “give effect to” in the context of the New Zealand Coastal Policy Statement (NZCPS) and held that:

“Give effect to” simply means “implement”. On the face of it, it is a strong directive, creating a firm obligation on the part of those subject to it ... There is a caveat, however. The implementation of such a directive will be affected by what it relates to, that is, what must be given effect to. A requirement to give effect to a policy which is framed in a specific and unqualified way may, in a practical sense, be more prescriptive than a requirement to give effect to a policy which is worded at a higher level of abstraction. “

The Supreme Court held that the “requirement to ‘give effect to’ the NZCPS is intended to constrain decision-makers”. Transpower submit that this applies equally to the NPSET in the context of decisions relating to electricity transmission. Similarly, the observation that the “NZCPS is a carefully expressed document whose contents are the result of a rigorous process of formulation and evaluation. It is a document which reflects particular choices” applies to the NPSET. The preamble of the NPSET highlights that the National Grid has particular physical characteristics and operational / security requirements that create challenges for its management under the RMA, and it is important there are consistent policy and regulatory approaches by local authorities.

Council must determine how to give effect to the NPSET, and similarly any future Hearings Panel must consider the NPSET in decisions on submissions. It is noted that the NPSET, along with further supporting documents, including an implementation guide, are available on the Ministry for the Environment website⁶.

Giving effect to the NPSET will ensure that:

- the National Grid is able to be safely, effectively and efficiently operated, maintained, upgraded and developed providing a reliable, safe and secure supply of electricity to the District and beyond; and

⁶ at <http://www.mfe.govt.nz/rma/central/transmission>

- the adverse effects of development in proximity to the National Grid are appropriately managed and are reduced, minimised or avoided depending upon the context in which the development occurs.

5.2 Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The NESETA came into effect on 14 January 2010 and sets out a national regulatory framework for activities related to existing National Grid lines, including the operation, maintenance and upgrading of such lines. The NESETA specifies permitted electricity transmission activities (subject to standards) and resource consent requirements where these activities do not meet the standards.

The NESETA only applies to the National Grid lines that existed at 14 January 2010 and does not apply to new lines or substations. As with the NPSET, the NESETA does not apply to electricity distribution lines.

Under section 44A of the RMA, local authorities are required to ensure that there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The provisions of the NESETA are therefore of particular relevance to the Proposed Plan.

6 Transpower's Submission

Transpower generally supports the intent by the Council to provide for the National Grid in the Proposed Plan, including the consideration of energy and utilities in a separate and stand-alone chapter.

Transpower also largely supports the inclusion of definitions for the National Grid and its corridor as well as rules which will manage and where required, restrict land use and development activities in close proximity to the National Grid.

Notwithstanding this general support, Transpower's detailed submission highlights some areas where provisions need to be added, amended or deleted to fully give effect to the NPSET and meet the requirements of section 32 of the RMA. In this regard Transpower acknowledges the dialogue that occurred with Council at the drafting phase of the Proposed Plan and seeks decisions to refine the approach to development in proximity to the National Grid, rather than large scale changes. In addition, Transpower seeks additional provisions that recognise the national significance of the National Grid and enable its operation, maintenance, upgrade and development.

Some of the requested changes are as a result of Transpower's evolving approach to the management of activities near the National Grid as it works with Councils around the country on various plan review and plan change processes to give effect to the NPSET.

6.1 Enabling National Grid Activity

While the NESETA manages and regulates transmission lines that were built before 14 January 2010, it does not manage or regulate substations. Further, the construction of new lines in the future to satisfy electricity demand and any network security or reconfiguration requirements cannot be ruled out. Therefore, the Proposed Plan needs to contemplate and provide an enabling framework for the development of the National Grid as a matter of national significance.

In light of Policies 1 -9 of the NPSET, which provide an enabling framework for the National Grid, the provisions of the Proposed Plan need to ensure:

- the sustainable management of the National Grid as a physical resource of national significance is recognised;
- the National Policy Statement on Electricity Transmission 2008 (NPSET) is given effect to;
- the benefits of the National Grid at a local, regional and national level are recognised;
- appropriate provision for the effective operation and maintenance of the network, including ensuring that transmission lines can be accessed as part of subdivision and development;
- that the National Grid can be upgraded and developed in order to meet network requirements such as growth in energy demand, and that there may be technical and operational requirements of the network that dictate route, site and method selection; and
- appropriate provision for the planning and development of new transmission assets.

6.2 Managing Adverse Effects on the National Grid

Transpower's detailed submission points particularly address matters that are directly related to Policies 10 and 11 of the NPSET, in terms of ensuring that the National Grid is appropriately "buffered" from activities that may have an adverse effect in terms of ongoing operation, maintenance, upgrade and development of the National Grid. Policies 10 and 11 of the NPSET provide the primary guidance to the management of adverse effects on the National Grid.

Policy 10 is as follows:

"In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised."

Under Policy 10, the Council is obliged to manage "to the extent reasonably possible" activities to avoid reverse sensitivity effects. It is "reasonably possible" for the Council to manage activities using district plan rules, including rules applying to the activities within buffer corridors. Transpower acknowledges that the Proposed Plan has sought to adopt such an approach but does not consider the provisions, as currently drafted, to be strong enough. Transpower considers additional provisions are required to truly give effect to Policy 10.

Policy 11 is as follows:

"Local authorities must consult with the operator of the National Grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the National Grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the National Grid (so as to facilitate the long-term strategic planning of the grid)."

Policy 11 of the NPSET requires local authorities to identify a buffer corridor. This is a mandatory requirement in order for the Council to give effect to the NPSET. Policy 11 also requires that sensitive activities within buffer corridors should not generally be provided for in plans and/or given resource consent. In order to give effect to Policy 11, the Proposed Plan needs to include rules to restrict the establishment of sensitive activities in proximity to National Grid assets. The language of Policy 11 supports a non-complying activity status for these activities within buffer corridors. The term "generally not be provided for in plans" indicates that plans should manage sensitive activities in such a way that their location within a buffer corridor would be the exception.

6.3 Summary

In summary, Transpower's submission generally seeks the following:

- Appropriate recognition of the NPSET in the hierarchy of RMA documents and the role it plays in establishing national policy;
- Retention of clear identification of the National Grid on the planning maps with some minor amendments to the terminology;
- Retention of a number of definitions, and the inclusion of further definitions to clarify the rules and plan users' understanding of the National Grid;
- Additional provisions which recognise the national significance of the National Grid;
- Additional provisions which protect the National Grid from adverse effects, including reverse sensitivity effects. This would give effect to Policies 10 and 11 of the NPSET, but also the Proposed Otago Regional Policy Statement; and
- Amendments to the rules regarding the development, maintenance and upgrading of utilities such as the National Grid, to ensure consistency with the NESETA; and
- Amendments to the rules regarding land use, development and subdivision in close proximity to the National Grid to ensure all development and use is covered.

Transpower New Zealand Limited seeks the following decision from the local authority:

Amend the Proposed Plan to make all required changes, including the specific amendments set out in the following tables; and such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

Transpower wishes **to be heard in support of its submission.**

Due to the specific interests of Transpower in the context of the National Grid, Transpower will not consider presenting a joint case with others at a hearing.

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**Signature of the person authorised to sign
on behalf of Transpower New Zealand Limited**

Date: 23 October 2015

PQLDP Provision	Support / Oppose / Amend	Submission / Reasons	Relief / Decision Sought
Chapter 1 – Introduction			
Section 1.3 – Cross Boundary Issues	Support with amendments	<p>Transpower supports Section 1.3 as it acknowledges the potential for cross-boundary issues. Transpower’s National Grid infrastructure crosses both district and regional boundaries all around the country with the Frankton-Cromwell 110kV transmission line crossing between the districts of Queenstown Lakes and Central Otago.</p> <p>Transpower considers that an additional bullet point would provide greater clarity and direction to Council decision-makers to apply a consistent and coordinated approach to provisions when infrastructure is proposed across regional or district boundaries. This amendment is consistent with the purpose and spirit of the NPSET and NESETA.</p>	<ul style="list-style-type: none"> ■ Add the following bullet point to the list of procedures Council will follow: <ul style="list-style-type: none"> <i><u>If infrastructure is proposed across regional or district boundaries, Council will apply a consistent and coordinated approach to the provisions.</u></i>
Section 1.6.11 – National and Regional Rules	Support with amendments	<p>Transpower supports the inclusion of a section which explains the relationship of the District Plan with National-level Policies and Standards. Transpower suggests that the inclusion of a diagram would assist with this explanation as well as explicit reference to the current national policy statements and national environmental standards.</p> <p>In the context of the NESETA, Transpower considers it necessary to explicitly state that District Plans cannot contain any rules that could duplicate or conflict with regulations in an NES.</p>	<ul style="list-style-type: none"> ■ Include explanatory diagram of the relationship between the district plan and other RMA plans and policy documents. ■ Include the following text: <ul style="list-style-type: none"> <i><u>In addition to the District provisions within this Plan, the RMA also requires national level Policies and Standards to be applied. National Policy Statements state policy on matters of national significance relevant to achieving the purposes of the RMA. A number of National Policy Statements have been enacted and the District Plan must give effect to these National Policy Statements. Similarly, a District Plan cannot contain rules that could duplicate or conflict with regulations in a National Environmental Standard. Similarly The Regional Council has its own rules which cover several Districts. These additional high level provisions will be referred to where practicable to do so. Users of the Plan are responsible</u></i>

			<i>to ensure that other such provisions are met.</i>
Section 1.6.14 – Consultation	Support with amendments	<p>Transpower supports the inclusion of a consultation section as it recognises that an applicant may need to undertake consultation with parties potentially affected by a proposed development, land use or subdivision activity. This is particularly relevant to activities undertaken within close proximity to the National Grid with the NPSET providing clear direction to Councils that the National Grid is protected from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks additional wording that encourages applicants to notify and consult with the owners and operators of infrastructure (such as Transpower) if a proposal or development may adversely affect that infrastructure.</p>	<ul style="list-style-type: none"> ■ Amend the second paragraph: <p><i>Special consultation procedures may apply to activities, which affect <u>infrastructure or sites</u> or values of significance to the tangata whenua. An applicant is advised to refer to any consultation documents, <u>national policy statements</u> or Iwi Management Plans, which the Council may have available.</i></p>
Chapter 2 – Definitions			
Amenity or Amenity Values	Support	Transpower supports the definition for ‘amenity or amenity values’ as it refers to the meaning as defined in section 2 of the RMA.	<ul style="list-style-type: none"> ■ Retain definition
New definition - Artificial crop protection structure		Transpower seeks a new definition be inserted in relation to “artificial crop support structure” to provide clarity to plan users in relation to the rules on buildings, structures and sensitive activities located within the National Grid Yard.	<ul style="list-style-type: none"> ■ Add a new definition: <p><u>“Artificial Crop Protection Structure: means structures of cloth used to protect crops and / or enhance growth.</u></p>
New definition – Crop support structure		Transpower seeks a new definition be inserted in relation to “crop support structure” to provide clarity to plan users in relation to the rules on buildings, structures and sensitive activities located within the National Grid Yard.	<ul style="list-style-type: none"> ■ Add a new definition for “crop support structure”
Building	Support with amendments	Transpower supports the definition as it excludes fences and walls less than 2m in height; retaining walls that support less than 2m of earthworks; and structures less than 5m ² in area and 2m in height.	<ul style="list-style-type: none"> ■ Retain definition
New definition – Earthworks within the National Grid Yard		Transpower notes that the definition for ‘earthworks’ in the District Plan excludes ‘ <i>the cultivation of land and the digging of holes for offal pits and the erection of posts or poles or the planting of trees</i> ’. These are activities	<ul style="list-style-type: none"> ■ Add a new definition: <p><u>“Earthworks within the National Grid Yard: means</u></p>

		<p>that should be subject to the National Grid corridor rules rather than exempt from them.</p> <p>Instead of altering the earthworks definition, which relates to all activities, Transpower therefore seeks to provide a new definition specifically for earthworks located within the National Grid Yard. This will give effect to Policies 10 and 11 of the NPSET as inappropriate earthworks can create adverse effects on the National Grid (for example by reducing clearance distances and undermining the stability of support structures).</p>	<p><u>earthworks but includes the cultivation of land and the digging of holes for offal pits and the erection of posts or poles or the planting of trees.”</u></p>
Factory Farming	Support	<p>Transpower supports this definition as it includes the key elements of factory farming. ‘Factory Farming’ is an activity which must be managed and controlled when located in close proximity to the National Grid to ensure it does not have adverse effects on the National Grid, including reverse sensitivity effects. As this term is used within the rules relating to buildings, structures and sensitive activities located in National Grid Yards, it is useful to define it for clarity reasons.</p>	<ul style="list-style-type: none"> ■ Retain definition
Farming Activity	Support	<p>As per the submission point above, Transpower supports this definition as this term is used within the rules relating to buildings, structures and sensitive activities located in National Grid Yards, and thus, it is useful to define it for clarity reasons.</p>	<ul style="list-style-type: none"> ■ Retain definition
Farm Building	Support	<p>As per the submission points above, Transpower supports this definition. ‘Farm Buildings’ is an activity which must be managed and controlled when located in close proximity to the National Grid to ensure it does not have adverse effects on the National Grid, including reverse sensitivity effects. As this term is used within the rules relating to buildings, structures and sensitive activities located in National Grid Yards, it is useful to define it for clarity reasons.</p>	<ul style="list-style-type: none"> ■ Retain definition
Minor Upgrading	Support with amendments	<p>Transpower supports this definition, particularly as it only relates to electricity distribution and transmission lines, rather than minor upgrading of all network utilities.</p>	<ul style="list-style-type: none"> ■ Amend definition as follows: <i>Minor Upgrading (in relation to transmission and distribution</i>

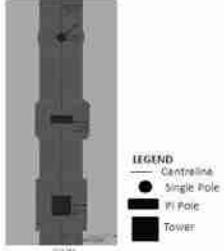
Transpower seeks minor amendments to the definition to ensure consistency with the NPSET and NESETA. Transpower has developed a definition for minor upgrading that covers all potential upgrading in relation to the National Grid. This definition has been used in other District Plans throughout New Zealand and thus Transpower seek Council also utilise this definition to ensure consistency across Districts.

electricity lines):

Means an increase in the carrying capacity, efficiency or security of transmission and distribution electricity lines utilising the existing support structures or structures of a similar scale, intensity and character, and includes the:

- Addition of a single service support structure for the purpose of providing a service connection to a site, except in the Rural zone;
- The addition of up to three new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone;
- Replacement of conductors or lines provided they do not exceed 30mm in diameter or the bundling together of any wire, cable or similar conductor provided that the bundle does not exceed 30mm in diameter;
 - a) Addition of circuits and conductors;
 - b) Reconducting of the line with higher capacity conductors;
 - c) Re-sagging of conductors existing lines;
 - d) Bonding of conductors;
 - e) Replacement of Addition of longer or more efficient insulators provided they are less or similar in length; and
 - f) Addition of electrical fittings;
 - g) Addition of earthwires which may contain lightning rods, and earth-peaks and earth-wires;
 - h) Support structure replacement within the same location as the support structure that is to be replaced;
 - i) Replacement of existing cross-arms with cross-arms

			<p><i>of an alternative design; and</i></p> <p>j) <u>Increase in support structure height required to comply with NZECP34:2001 by not more than 15% of the base height of the support structure, and where the base height is defined as the height of the structure at date of public notification of the Plan.</u></p>
New definition – National Grid		Transpower seeks the inclusion of a definition for the National Grid as this is consistent with the NPSET and NESETA. In addition, the term 'National Grid' is used throughout the District Plan and thus it needs to be defined for clarity purposes.	<ul style="list-style-type: none"> ■ Add a new definition: <p><u>National Grid</u> means the same as in the National Policy Statement on Electricity Transmission 2008.</p>
National Grid Corridor	Support with amendments	Transpower supports the inclusion of a definition for the National Grid Corridor but seeks it be amended to "National Grid <u>Subdivision</u> Corridor" to ensure consistency with the NPSET and to avoid confusion for users of the District Plan. This is consistent with other District Plans throughout New Zealand.	<ul style="list-style-type: none"> ■ Amend the definition: <p><u>National Grid Subdivision Corridor</u>: means the area measured either side of the centreline of above ground National Grid line as follows:</p> <ul style="list-style-type: none"> ■ 16m for the 110kV lines on pi poles ■ 32m for 110kV lines on towers ■ 37m for the 220kV transmission lines <p><i>Note: The National Grid Corridor <u>and</u> National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.</i></p>
National Grid Sensitive Activities	Support	Transpower supports the definition of 'National Grid Sensitive Activities'. It is specific to the National Grid and includes activities such as educational activities, child daycare activities, hospitals, residential activities and visitor accommodation, making it consistent with the definition of sensitive activities provided in the NPSET.	<ul style="list-style-type: none"> ■ Retain the definition
National Grid Yard	Support with amendments	Transpower strongly supports the definition of 'National Grid Yard' as the terminology and distances are consistent with the NPSET, in particular Policies 11 and 12.	<ul style="list-style-type: none"> ■ Amend definition as follows: <p><i>Means:</i></p> <ul style="list-style-type: none"> – the area located 12 metres in any direction from the outer

		<p>Transpower seeks minor amendments to the definition to ensure it is consistent with the NPSET.</p>	<p>edge of a National Grid support structure; and – the area located 12 metres either side of the centreline of any overhead National Grid line; (as shown in dark grey in diagram below)</p>  <p>Note: The National Grid <u>Corridor and National Grid Yard</u> does not apply to underground cables or any transmission lines (or sections of line) that are designated.</p>
<p>New definition – Regionally significant infrastructure</p>		<p>Transpower considers a new definition be inserted for regionally significant infrastructure, which would also include nationally significant infrastructure such as the National Grid. Regionally significant infrastructure must be recognised and provided for within the District Plan to ensure the ongoing operation, maintenance, development and upgrade of infrastructure which is necessary for the well-being of the community and the greater Otago region. This is consistent with other District Plans throughout New Zealand and would also give effect to the NPSET as well as the Proposed Otago Regional Policy Statement (specifically Policy 3.5.1).</p> <p>In addition, the District Plan should provide a policy framework to not only enable the operation, maintenance, upgrade and development of regionally significant infrastructure to meet the needs of present and future generations, but also a policy framework to protect regionally significant infrastructure from adverse effects associated with development, land use and subdivision, including reverse sensitivity effects.</p> <p>Transpower has provided a definition which reflects the Otago Regional Policy Statement.</p>	<p>■ Add a new definition:</p> <p><u>“Regionally significant infrastructure: includes the following:</u></p> <p>a) <u>Renewable electricity generation facilities, where they supply the national electricity grid and local distribution network; and</u></p> <p>b) <u>The National Grid; and</u></p> <p>c) <u>The Electricity distribution network; and</u></p> <p>d) <u>Telecommunication and radio communication facilities; and</u></p> <p>e) <u>Road classified as being of national or regional importance; and</u></p> <p>f) <u>Marinas and Airports; and</u></p> <p>g) <u>Structures for transport by rail.”</u></p>

New definition – Reverse sensitivity		<p>The term ‘reverse sensitivity’ should be defined within the District Plan to assist with the interpretation of objectives and policies, especially in the context of activities located in close proximity to the National Grid.</p> <p>The proposed definition is derived from case law (Gateway Funeral Services v Whakatane DC EnvC Wellington W005/08, 5 February 2008).</p>	<ul style="list-style-type: none"> ■ Add a new definition: <i><u>“Reverse Sensitivity: is the legal vulnerability of an established activity to complaint from a new land use. It arises when an established use is causing adverse environmental impact to nearby land, and a new, benign activity is proposed for the land. The ‘sensitivity’ is this: if the new use is permitted, the established use may be required to restrict its operations or mitigate its effects so as not to adversely affect the new activity.”</u></i>
New definition - Protective canopy		<p>Transpower seeks that a new definition be inserted in relation to “protective canopy” to provide clarity to plan users in relation to the rules on buildings, structures and sensitive activities located within the National Grid Yard.</p>	<ul style="list-style-type: none"> ■ Add a new definition: <i><u>“Protective Canopy: means a structure partly enclosed with impermeable material to provide protection to crops, but does not include artificial crop protection structures.”</u></i>
Sensitive Activities – Transmission Corridor	Support with amendments	<p>The proposed term is generally supported but Transpower notes that there are two definitions for Sensitive Activities near the National Grid in the District Plan: <i>National Grid Sensitive Activities</i> and <i>Sensitive Activities – Transmission Corridor</i>. Transpower considers that only one definition needs to be provided and would prefer it is the National Grid Sensitive Activities definition.</p>	<ul style="list-style-type: none"> ■ Delete definition and retain the definition “National Grid Sensitive Activities”.
Structure	Support	<p>Transpower supports the definition of structure as it includes any buildings, equipment device or other facility made by people and thus includes network utilities such as the National Grid.</p>	<ul style="list-style-type: none"> ■ Retain definition
Utility	Support	<p>Transpower supports the definition of utility but requests some minor amendments.</p>	<ul style="list-style-type: none"> ■ Amend definition as follows: <i>Means the systems, services, structures and networks necessary for operating and supplying essential utilities and services to the community including but not limited to:</i> <ul style="list-style-type: none"> – <i>transformers, lines and necessary and incidental structures and equipment for the transmissions and distribution of electricity;</i>

- pipes and necessary incidental structures and equipment for transmitting and distributing gas;
- storage facilities, pipes and necessary incidental structures and equipment for the supply and drainage of water or sewage;
- water and irrigation races, drains, channels, pipes and necessary incidental structures and equipment (excluding water tanks);
- structures, facilities, plant and equipment for the treatment of water;
- structures, facilities, plant, equipment and associated works for receiving and transmitting telecommunications and radio communications (see definition of telecommunication facilities);
- structures, facilities, plant, equipment and associated works for monitoring and observation of meteorological activities and natural hazards;
- structures, facilities, plant, equipment and associated works for the protection of the community from natural hazards.
- structures, facilities, plant and equipment necessary for navigation by water or air;
- waste management facilities; and
- Anything described as a network utility operation in s166 of the Resource Management act 1991

Utility does not include structures or facilities used for electricity generation, the manufacture and storage of gas, or the treatment of sewage.

Chapter 3 – Strategic Direction

Objective 3.2.1.5

Support with amendments

Transpower supports the objective as it aims to maintain and promote the efficient operation of the District's infrastructure. However, the examples of infrastructure do not include the National Grid. The National Grid is nationally and regionally significant infrastructure that is vital if the District

■ **Amend** the objective:

Maintain and promote the efficient and effective operation, maintenance, development and upgrading of the District's

		<p>is to achieve the overlying goal of developing a prosperous, resilient and equitable economy.</p> <p>Transpower also seeks minor amendments to ensure consistency with the terminology used in the NPSET.</p>	<p><i>infrastructure, including designated Airports, <u>the National Grid</u>, key roading, and communication technology networks.</i></p>
Objective 3.2.2.1	Support with amendments	<p>Objective 3.2.2.1 should be altered to ensure that urban growth and development does not adversely affect regionally significant infrastructure, such as Transpower's National Grid. This not only gives effect to the Objective and Policies 2, 10 and 11 of the NPSET, but also to the objectives and policies contained in the Proposed Otago Regional Policy Statement which provides clear direction to Territorial Authorities to protect infrastructure corridors both now and in the future.</p> <p>The objective and policies contained in the Proposed Otago Regional Policy Statement also aim to integrate infrastructure with land use.</p>	<ul style="list-style-type: none"> ■ Amend the objective: <p><i>Ensure urban <u>growth and development</u> occurs in a logical manner:</i></p> <ul style="list-style-type: none"> • <i>to promote a compact, well designed and integrated urban form;</i> • <i>to manage the cost of Council infrastructure;</i> • <i>to avoid adversely affecting the <u>effective and efficient operation, maintenance, upgrading and development of regionally significant infrastructure</u>; and</i> • <i>to protect the District's rural landscapes from sporadic and sprawling development.</i>
Policy 3.2.2.1.3	Support with amendments	<p>Transpower's National Grid is located within the Urban Growth Boundary at Shotover Country (planning map 30) and Frankton (planning map 31).</p> <p>Transpower therefore seeks Policy 3.2.2.1.3 be amended to give effect to the NPSET and thus ensure that urban growth and development within the Urban Growth Boundaries (UGBs) does not adversely affect regionally significant infrastructure such as the National Grid.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>Manage the <u>pattern, form and design</u> of urban <u>growth and development</u> within the UGBs ensuring:</i></p> <ul style="list-style-type: none"> • <i>Connectivity and integration with existing urban development;</i> • <i>Sustainable provision of Council infrastructure;</i> • <i><u>Land use does not adversely affect the effective and efficient operation, maintenance, upgrading or development of regionally significant infrastructure</u>; and</i> • <i>Facilitation of an efficient transport network, with particular regard to integration with public and active transport systems.</i>
Policy 3.2.4.2.1	Support with	<p>Transpower supports the policy but seeks it be amended to reflect that</p>	<ul style="list-style-type: none"> ■ Amend the policy:

	amendments	<p>regionally significant infrastructure, such as a new electricity substation or line, may have a functional, operational and / or locational need to be located within or near an area identified as a Significant Natural Area. These activities may have unavoidable adverse effects on those values and thus could potentially be declined statutory approval under the direction of this policy.</p> <p>Transpower therefore seeks that the policy be amended to acknowledge that some developments may need to be located in particular areas. This amendment would give effect to Policies 2, 3 and 8 of the NPSET.</p>	<p><i>Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas on the District Plan maps and ensure their protection <u>from inappropriate subdivision, use and development.</u></i></p>
Policy 3.2.4.6.1	Support with amendments	<p>Transpower supports this policy but notes that the word “avoid” should be used carefully due to the recent Supreme Court decision on the King Salmon Case (<i>Environmental Defence Society Incorporated v. The New Zealand King Salmon Co Ltd</i>). In that case, the Court stated that the word “avoid” means “not allowing” or “preventing the occurrence of”.</p> <p>The policy should therefore be amended to be consistent with terminology used in section 5(2)(c) of the RMA which states that the use, development and protection of natural and physical resources should occur in a way that avoids, remedies or mitigates any adverse effects on the environment. As currently worded, the policy does not acknowledge that adverse effects may be remedied or mitigated when avoidance is not possible. This also appropriately acknowledges the technical, operational and locational constraints of the National Grid (Policy 3 of the NPSET).</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>That subdivision and / or development be designed so as to avoid, <u>or where this not possible, remedy or mitigate,</u> adverse effects on the water quality of lakes, rivers and wetlands in the District.</i></p>
Objective 3.2.5.1	Support with amendments	<p>Transpower supports the objective but seeks it be amended to reflect that some activities, such as a new electricity substation or line, may have a functional, operational and / or locational need to be located within or near areas identified as Outstanding Natural Landscapes or Features (as recognised in Policies 3 and 8 of the NPSET). These activities may have unavoidable adverse effects on those values and thus could potentially be declined statutory approval under the direction of this policy. In addition, the overlying goal is that “<i>our distinctive landscapes are protected from <u>inappropriate development</u></i>”.</p>	<ul style="list-style-type: none"> ■ Amend the objective: <p><i>Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features <u>from inappropriate subdivision, use and development.</u></i></p>

		Transpower therefore seeks that the policy be amended to acknowledge that some developments may need to be located in particular areas, making it consistent with the overlying goal.	
Policy 3.2.5.1.1	Support with amendments	As per the submission point above, Transpower seeks the policy be amended to be consistent with the overlying goal.	<ul style="list-style-type: none"> ■ Amend the policy: <i>Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the adverse effects of <u>inappropriate subdivision, use and development.</u></i>
Objective 3.2.5.2	Support with amendments	Transpower considers that the objective should acknowledge that adverse landscape effects on Rural Landscapes may not be able to be completely minimised. Transpower suggests the wording should be consistent with the RMA which states 'avoid, remedy or mitigate adverse effects'.	<ul style="list-style-type: none"> ■ Amend the objective: <i><u>Avoid, remedy or mitigate</u> Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes.</i>
Policy 3.2.5.2.1	Support with amendments	As per the submission point above, Transpower considers that the objective should acknowledge that adverse landscape effects on Rural Landscapes may not be able to be completely minimised. In addition, Transpower suggests the wording should be consistent with the RMA which states 'avoid, remedy or mitigate adverse effects'.	<ul style="list-style-type: none"> ■ Amend the policy: <i>Identify the district's Rural Landscape Classification on the district plan maps, and <u>avoid, remedy or mitigate</u> minimise the effects of subdivision, use and development on these landscapes.</i>
Policy 3.2.6.3.2	Support with amendments	Transpower seeks minor amendments to the policy to acknowledge that open spaces can have multiple uses – for example, National Grid transmission corridors could potentially be used as open, connecting spaces such as cycleways and walkways. This is particularly possible in the Queenstown Lakes District where the National Grid intersects with an ONL (Gibbston Valley) and RLC (Frankton and Lake Hayes) and is located near to waterways and residential developments.	<ul style="list-style-type: none"> ■ Amend the policy: <i>That open spaces and community facilities are located and designed to be desirable, safe, accessible places <u>and recognise that they can have multiple uses.</u></i>

Chapter 4 – Urban Development

4.1 – Purpose	Support with	Transpower supports the purpose of Chapter 4 as it seeks to achieve	<ul style="list-style-type: none"> ■ Add an following amendments and additional paragraph:
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	amendments	<p>integration between land use, infrastructure and community facilities. However, there is no mention of integrating land use development and growth with regionally significant infrastructure such as the National Grid. Land use integration is not only provided for in the NPSET but it is also a key theme in the objectives and policies contained in the Proposed Otago Regional Policy Statement, to which the District Plan must give effect and be consistent with.</p> <p>In order to give effect to the NPSET and the Proposed Otago Regional Policy Statement, land use integration with infrastructure, such as the National Grid, needs to be recognised and provided for.</p>	<p><i>Uncontrolled urban development can result in the fragmentation of rural land; and poses risks of urban sprawl, disconnected urban settlements and a <u>poorly-ineffective and inefficient</u> coordinated infrastructure network. The roading network of the District is under some pressure and more low density residential development located remote from employment and service centres has the potential to exacerbate such problems.</i></p> <p><i>The objectives and policies for Urban Development provide a framework for a managed approach to urban development that utilises land and resources in an efficient manner, and preserves and enhances natural amenity values. The approach seeks to achieve integration between land use, <u>infrastructure such as transportation, services, open space networks, community facilities and education</u>; and increases the viability and vibrancy of urban areas</i></p> <p><i><u>Well planned urban growth and land use will also ensure that adverse effects on the operation, maintenance, upgrading and long-term development of regionally significant infrastructure, such as the National Grid, are avoided.</u></i></p>
Objective 4.2.1	Support with amendments	<p>Transpower strongly supports the purpose of the objective which seeks to coordinate urban development with infrastructure and services. However, Transpower considers the objective could be amended to also ensure that this infrastructure is not adversely affected by the urban development and growth, thereby giving effect to Policies 10 and 11 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend the objective: <p><i>Urban development <u>and growth</u> is coordinated with infrastructure and services and is undertaken in a manner that protects the environment, rural amenity and outstanding natural landscapes and features, <u>and protects infrastructure from adverse effects, including reverse sensitivity effects.</u></i></p>
Policy 4.2.1.2	Support with amendments	<p>Transpower supports the policy but seeks minor amendments to ensure that the policy is consistent with Policies 10 and 11 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>Urban development <u>and growth</u> is integrated with existing</i></p>

			<i>public regionally significant infrastructure, and achieves a pattern, form and design that does not adversely affect existing regionally significant infrastructure and does not restrict the upgrade and development of that infrastructure is designed and located in a manner consistent with the capacity of existing networks.</i>
Policy 4.2.3.1	Support with amendments	Transpower seeks minor amendments to the policy to ensure the terminology used is consistent with that used in the Proposed Otago Regional Policy Statement (regionally significant infrastructure rather than public infrastructure). In addition, Transpower seeks an additional bullet point to ensure land use does not adversely affect the National Grid, thereby giving effect to Policies 10 and 11 of the NPSET.	<ul style="list-style-type: none"> ■ Amend the policy: <ul style="list-style-type: none"> <i>Provide for a compact urban form that utilises land and infrastructure in an efficient and sustainable manner, ensuring:</i> <ul style="list-style-type: none"> • <i>connectivity and integration;</i> • <i>the sustainable use of <u>public regionally significant infrastructure</u>;</i> • <i>convenient linkages to the public and active transport network; and</i> • <i><u>land use does not adversely affect the safe, secure and effective operation, maintenance, upgrading and development of the National Grid.</u></i> • <i>housing development does not compromise opportunities for commercial or community facilities in close proximity to centres.</i>
Policy 4.2.3.4	Support with amendments	Transpower seeks minor amendments to the policy to ensure that urban development occurs in locations that will not adversely affect the operation, maintenance, upgrading and developing of regionally significant infrastructure, such as the National Grid. The amendments will give effect to Policies 10 and 11 of the NPSET.	<ul style="list-style-type: none"> ■ Amend the policy: <ul style="list-style-type: none"> <i>Urban development occurs in locations that are adequately serviced by existing public infrastructure, or where infrastructure can be efficiently upgraded, and will not <u>adversely affect the safe, secure and effective operation, maintenance, upgrading and developing of regionally significant infrastructure.</u></i>
Policy 4.2.3.5	Oppose	The policy, as currently worded, is confusing as there is no definition provided for public infrastructure. Transpower is therefore unsure whether the National Grid and its associated infrastructure may come under the	<ul style="list-style-type: none"> ■ Delete the policy <ul style="list-style-type: none"> <i>For urban centres where Urban Growth Boundaries apply,</i>

		<p>ambit of this policy. If so, this policy may limit the development and upgrading of the National Grid, with the Frankton substation located within the Queenstown Urban Growth Boundary but the remaining Frankton-Cromwell transmission line is located within Rural zones.</p> <p>The National Grid may have a locational, technical or operational requirement to be located within any part of the District and thus Transpower seeks no provisions which may inhibit the development of the National Grid.</p>	<p>new public infrastructure networks are limited exclusively to land within defined Urban Growth Boundaries.</p>
Policy 4.2.4.2	Support with amendments	<p>Transpower seeks an additional bullet point be added to Policy 4.2.4.2 to ensure land use does not adversely affect the National Grid, thereby giving effect to Policies 10 and 11 of the NPSET.</p>	<p>■ Amend the policy:</p> <p><i>Ensure that development within the Queenstown Urban Growth Boundary:</i></p> <ul style="list-style-type: none"> • <i>Provides a diverse supply of residential development to cater for the needs of residents and visitors</i> • <i>Provides increased density in locations close to key public transport routes and with convenient access to the Queenstown Town Centre</i> • <i>Provides an urban form that is sympathetic to the natural setting and enhances the quality of the built environment</i> • <i>Provides infill development as a means to address future housing demand</i> • <i>Provides a range of urban land uses that cater for the foreseeable needs of the community</i> • <i>Maximises the efficiency of existing infrastructure networks and avoids expansion of networks before it is needed for urban development</i> • <i><u>Does not adversely affect the safe, secure and effective operation, maintenance, upgrading and developing of regionally significant infrastructure</u></i> • <i>Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities</i>

- Does not diminish the qualities of significant landscape features

Chapter 5 – Tangata Whenua

Policy 5.4.5.1	Support with amendments	<p>Transpower supports the policy but seeks it be amended to reflect that some activities, such as a new electricity substation or line, may have a functional, operational and / or locational need to be located within or near areas of significance to iwi. These activities may have unavoidable adverse effects on those values and thus could potentially be declined statutory approval under the direction of this policy.</p> <p>Transpower therefore seeks that the policy be amended to acknowledge that some developments may need to be located in particular areas. This gives effect to Policies 2 and 3 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>Identify wāhi tūpuna and all their components on the District Plan maps and protect them from the adverse effects of <u>inappropriate</u> subdivision, use and development.</i></p>
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Chapter 6 – Landscapes (National Grid intersects a Rural Landscape Classification (RLC) at Frankton and Lake Hayes, and an Outstanding Natural Landscape (ONL) at Gibbston Valley)

Section 6.2 - Values	Support with amendments	<p>Transpower acknowledges the national importance of outstanding landscapes, but considers that this status needs to be balanced with other matters of national importance, such as enabling the operation, maintenance, upgrading and development of the National Grid.</p> <p>The proposed amendments to Section 6.2 will also assist in giving effect to the Objective and Policies 1, 2, 3 and 8 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend Section 6.2: <p><i>Landscapes have been categorised into three classifications within the Rural Zone. These are Outstanding Natural Landscapes (ONL) and Outstanding Natural Features (ONF), where their use, development and protection are a matter of national importance under Section 6 of the RMA. <u>These landscape values need to be carefully managed and protected from inappropriate subdivision, use and development. They must also be balanced with other matters of national importance, such as the operation, maintenance, upgrading and development of the National Grid. The Rural Landscapes Classification (RLC) makes up the remaining Rural Zoned land and has varying types of landscape character and amenity values. Specific policy and assessment matters are provided to manage the potential</u></i></p>
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			<i>effects of subdivision and development in these locations.</i>
Policy 6.3.1.3	Support with amendments	<p>Transpower acknowledges the national importance of outstanding landscapes and only allowing appropriate development within these areas, but considers that this needs to be balanced with other matters of national importance, such as enabling the operation, maintenance, upgrading and development of the National Grid. In addition, the policy needs to recognise that the values in some landscapes are modified by existing infrastructure and there is an ongoing need for this infrastructure to be operated, maintained, upgraded and developed.</p> <p>The proposed amendments to Policy 6.3.1.3 will also assist in giving effect to Policies 1, 2, 3 and 8 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases. <u>Infrastructure activities should be enabled and provided for where they have been historically established and need to be operated, maintained upgraded and developed in these areas. New National Grid infrastructure should seek to avoid Outstanding Natural Landscapes and Outstanding Natural Features while recognising that the infrastructure is subject to significant locational, technical or operational constraints, or that there can be no feasible practicable, alternative route, and/or that significant adverse effects can be outweighed by the overall benefits of the proposal.</u></i></p>
Policy 6.3.1.4	Support with amendments	<p>Transpower acknowledges the national importance of outstanding landscapes and only allowing appropriate development within these areas, but considers that this needs to be balanced with other matters of national importance, such as enabling the operation, maintenance, upgrading and development of the National Grid.</p> <p>The proposed amendments to Policy 6.3.1.4 will also assist in giving effect to Policy 1 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>That subdivision and development proposals located within the Rural Landscape be assessed against the assessment matters in provisions 21.7.2 and 21.7.3 because subdivision and development is inappropriate in many locations in these landscapes, meaning successful applications will be, on balance, consistent with the assessment matters. <u>Infrastructure activities should be enabled and provided for where they have been historically established and need to be operated, maintained upgraded and developed in these</u></i></p>

			<p><u>areas. New National Grid infrastructure should seek to avoid Outstanding Natural Landscapes and Outstanding Natural Features while recognising that the infrastructure is subject to significant locational, technical or operational constraints, or that there can be no feasible practicable, alternative route, and/or that significant adverse effects can be outweighed by the overall benefits of the proposal.</u></p>
Policy 6.3.3.1	Support with amendments	<p>Transpower supports the policy but seeks it be amended to reflect that some activities, such as a new electricity substation or line, may have a functional, operational and / or locational need to be located within or near areas identified as Outstanding Natural Features. These activities may have unavoidable adverse effects on those values and thus could potentially be declined statutory approval under the direction of this policy.</p> <p>Transpower therefore seeks that the policy be amended to acknowledge that some developments may need to be located in particular areas, making it consistent with the overlying goal.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>Avoid <u>inappropriate</u> subdivision and development on Outstanding Natural Features to protect, maintain or enhance Outstanding Natural Features.</i></p>
Policy 6.3.4.1	Support with amendments	<p>As per the submission point above, Transpower supports the policy but seeks it be amended to reflect that some activities, such as a new electricity substation or line, may have a functional, operational and / or locational need to be located within or near areas identified as Outstanding Natural Landscapes. These activities may have unavoidable adverse effects on those values and thus could potentially be declined statutory approval under the direction of this policy.</p> <p>Transpower therefore seeks that the policy be amended to acknowledge that some developments may need to be located in particular areas, making it consistent with the overlying goal.</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>Avoid <u>inappropriate</u> subdivision and development that would degrade the important qualities of the landscape character and amenity, particularly where there is no or little capacity to absorb change.</i></p>
Policy 6.3.5.2	Oppose in part	<p>Transpower oppose this policy as currently worded as it may restrict the operation, maintenance, development and upgrading of the National Grid. The Cromwell-Frankton transmission line is located within areas identified as Rural Landscapes, particularly around Frankton and Lake Hayes. A</p>	<ul style="list-style-type: none"> ■ Amend the policy: <p><i>Avoid adverse effects from subdivision and</i></p>

		<p>transmission line or substation will always be highly visible, particularly the Cromwell-Frankton transmission line as it is located near the State Highway as well as the Frankton township and existing residential developments such as Lake Hayes Estate.</p> <p>Transpower therefore seeks that the policy be amended to provide an exemption to regionally significant infrastructure, such as the National Grid, which would undoubtedly be highly visible from public places.</p>	<p><i>development (<u>other than regionally significant infrastructure</u>) that are:</i></p> <ul style="list-style-type: none"> • <i>Highly visible from public places and other places which are frequented by members of the public generally (except any trail as defined in this Plan); and</i> • <i>Visible from public roads.</i>
Chapter 7 – Low Density Residential (National Grid intersects the Low Density Residential Zone at Lakes Hayes Estate)			
Objective 7.2.7	Support with amendments	<p>Transpower supports the intention of this objective as residential developments can result in potentially adverse effects on infrastructure. However, the objective needs to be strengthened to recognise that enabling residential development in close proximity to regionally significant infrastructure, such as the National Grid, may limit the ability of that infrastructure to operate, be maintained, upgraded or developed as expected. In order to give effect to Policy 10 of the NPSET, Transpower seeks the Objective be amended to ensure development does not adversely affect the National Grid.</p>	<ul style="list-style-type: none"> ■ Amend Objective: <p><i>Ensure development efficiently utilises existing infrastructure and <u>does not adversely affect the safe, effective and efficient operation, maintenance, development and upgrade of minimises impacts on regionally significant infrastructure, including the National Grid and roading networks.</u></i></p>
Section 7.3.1 – District Wide Rules	Support with amendments	<p>Transpower acknowledges that the rules relating to land use and development in close proximity to the National Grid are provided for within Chapter 30: Energy and Utilities. Transpower supports this approach as it keeps all the rules relating to the National Grid in one chapter.</p> <p>However, Transpower is concerned that some plan users will only look within the relevant zone chapter and will therefore not consider to look within the Utilities Chapter if their land use, development or subdivision is in close proximity to the National Grid. In addition, the NPSET gives specific direction that Councils must protect the National Grid from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks an additional clause be inserted into Section</p>	<ul style="list-style-type: none"> ■ Add the following clause: <p><i>Attention is drawn to the following District Wide chapters, particularly Chapter 30: Energy and Utilities for any use, <u>development or subdivision located near the National Grid.</u> All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</i></p>

		7.3.1 that directs plan users / applicants to also consider Chapter 30 – Energy and Utilities. This will ensure that the District Plan gives effect to the NPSET.	
Chapter 8 – Medium Density Residential (National Grid intersects the Medium Density Residential Zone north of Frankton Substation)			
Objective 8.2.7	Support with amendments	Transpower supports the intention of this objective as residential developments can result in potentially adverse effects on infrastructure. However, the objective needs to be strengthened to recognise that enabling residential development in close proximity to regionally significant infrastructure, such as the National Grid, may limit the ability of that infrastructure to operate, be maintained, upgraded or developed as expected. In order to give effect to Policy 10 of the NPSET, Transpower seeks the Objective be amended to ensure development does not adversely affect the National Grid.	<ul style="list-style-type: none"> ■ Amend Objective: <i>Ensure medium density development efficiently utilises existing infrastructure and <u>does not adversely affect the safe, effective and efficient operation, maintenance, development and upgrade of</u> minimises impacts on <u>regionally significant infrastructure, including the National Grid and roading networks.</u></i>
Policy 8.2.7.2	Support with amendments	Transpower seeks minor amendments to the policy to ensure land use does not adversely affect regionally significant infrastructure, such as the National Grid, thereby giving effect to Policies 10 and 11 of the NPSET.	<ul style="list-style-type: none"> ■ Amend Policy: <i>Medium density development is located in areas that are well serviced by public transport and infrastructure, trail/track networks, and is designed in a manner consistent with the capacity of infrastructure networks <u>and in a manner that will not adversely affect the safe, secure and effective operation, maintenance, upgrading and developing of regionally significant infrastructure.</u></i>
Section 8.3.1 – District Wide Rules	Support with amendments	<p>Transpower acknowledges that the rules relating to land use and development in close proximity to the National Grid are provided for within Chapter 30: Energy and Utilities. Transpower supports this approach as it keeps all the rules relating to the National Grid in one chapter.</p> <p>However, Transpower is concerned that some plan users will only look within the relevant zone chapter and will therefore not consider to look within the Utilities Chapter if their land use, development or subdivision is</p>	<ul style="list-style-type: none"> ■ Add the following clause: <i>Attention is drawn to the following District Wide chapters, <u>particularly Chapter 30: Energy and Utilities for any use, development or subdivision located near the National Grid.</u> All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</i>

		<p>in close proximity to the National Grid. In addition, the NPSET gives specific direction that Councils must protect the National Grid from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks an additional clause be inserted into Section 7.3.1 that directs plan users / applicants to also consider Chapter 30 – Energy and Utilities. This will ensure that the District Plan gives effect to the NPSET.</p>	
Chapter 9 – High Density Residential			
Objective 9.2.6		<p>Transpower supports the intention of this objective as residential developments can result in potentially adverse effects on infrastructure. However, the objective needs to be strengthened to recognise that enabling residential development in close proximity to regionally significant infrastructure, such as the National Grid, may limit the ability of that infrastructure to operate, be maintained, upgraded or developed as expected. In order to give effect to Policy 10 of the NPSET, Transpower seeks the Objective be amended to ensure development does not adversely affect the National Grid.</p>	<ul style="list-style-type: none"> ■ Amend Objective: <i>Ensure High-density residential development will efficiently utilises existing infrastructure and does not adversely affect the safe, effective and efficient operation, maintenance, development and upgrade of <u>minimises impacts on regionally significant infrastructure, including the National Grid and roading networks.</u></i>
Section 9.3.1 – District Wide Rules	Support with amendments	<p>Transpower acknowledges that the rules relating to land use and development in close proximity to the National Grid are provided for within Chapter 30: Energy and Utilities. Transpower supports this approach as it keeps all the rules relating to the National Grid in one chapter.</p> <p>However, Transpower is concerned that some plan users will only look within the relevant zone chapter and will therefore not consider to look within the Utilities Chapter if their land use, development or subdivision is in close proximity to the National Grid. In addition, the NPSET gives specific direction that Councils must protect the National Grid from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks an additional clause be inserted into Section</p>	<ul style="list-style-type: none"> ■ Add the following clause: <i>Attention is drawn to the following District Wide chapters, particularly Chapter 30: Energy and Utilities for any use, development or subdivision located near the National Grid. All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</i>

		7.3.1 that directs plan users / applicants to also consider Chapter 30 – Energy and Utilities. This will ensure that the District Plan gives effect to the NPSET.	
Chapter 21 – Rural			
Section 21.1 – Zone Purpose	Support with amendments	<p>The Rural Zone Purpose does not recognise that infrastructure activities are also established in the rural area and have a functional, locational and operational requirement to be located in the rural zone.</p> <p>The proposed amendments to Section 21.1 will assist in giving effect to Policies 2 and 8 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend Section 21.1: <p><i>In addition, the Rural Industrial Sub Zone includes established industrial activities that are based on rural resources or support farming and rural productive activities. <u>It is also important to recognise that infrastructure is an established rural activity and has a functional, locational and operational need to be located in the rural area. It is important that such infrastructure is enabled to be operated, maintained, upgraded and developed safely, effectively and efficiently.</u></i></p>
Objective 21.2.1	Support with amendments	<p>The objective does not recognise that regionally significant infrastructure, such as the National Grid, has a functional, operational and locational need to be located within the Rural zone. In addition, the National Grid is currently located within land zoned Rural between Lakes Hayes Estate and Gibbston Valley, alongside the Kawarau River. This portion of the National Grid will require maintenance in the future and may also likely require upgrading or development.</p> <p>The objective needs to recognise that regionally significant infrastructure will also need to be located within the Rural zone, both existing infrastructure and new infrastructure. In addition, the proposed wording is more consistent with the terminology used in the RMA and the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend Objective: <p><i>Enable farming, <u>regionally significant infrastructure, permitted and established activities while avoiding, remedying or mitigating effects on</u> protecting, maintaining and enhancing landscape, ecosystem services, nature conservation and rural amenity values.</i></p>
Objective 21.2.13	Support with amendments	<p>The objective does not recognise that regionally significant infrastructure, such as the National Grid, has a functional, operational and locational need to be located within the Rural zone. In addition, the National Grid is currently located within land zoned Rural between Lakes Hayes Estate</p>	<ul style="list-style-type: none"> ■ Amend Objective: <p><i>Enable rural industrial <u>and infrastructure</u> activities within the Rural Industrial Sub Zones, that support rural based activities including farming and rural productive activities,</i></p>

		<p>and Gibbston Valley, alongside the Kawarau River. This portion of the National Grid will require maintenance in the future and may also likely require upgrading or development.</p> <p>The objective needs to recognise that regionally significant infrastructure will also need to be located within the Rural zone, both existing infrastructure and new infrastructure. In addition, the proposed wording is more consistent with the terminology used in the RMA and the NPSET.</p>	<p>while avoiding, remedying or mitigating effects on protecting, maintaining and enhancing rural character, amenity and landscape values.</p>
Objective 21.2.4	Support with amendments	<p>Objective 21.2.4 as currently worded provides the framework for managing adverse effects on existing and anticipated activities. This should be extended to specifically include reverse sensitivity effects, but should also be extended to existing and future regionally significant infrastructure.</p> <p>The amendments will assist in giving effect to Policies 2, 10 and 11 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend Objective: <p>Manage <u>Avoid situations where sensitive activities conflict with existing and anticipated activities and regionally significant infrastructure in the Rural Zone, protecting the activities and regionally significant infrastructure from adverse effects, including reverse sensitivity effects.</u></p>
Section 21.3.1 – District Wide Rules	Support with amendments	<p>Transpower acknowledges that the rules relating to land use and development in close proximity to the National Grid are provided for within Chapter 30: Energy and Utilities. Transpower supports this approach as it keeps all the rules relating to the National Grid in one chapter.</p> <p>However, Transpower is concerned that some plan users will only look within the relevant zone chapter and will therefore not consider to look within the Utilities Chapter if their land use, development or subdivision is in close proximity to the National Grid. In addition, the NPSET gives specific direction that Councils must protect the National Grid from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks an additional clause be inserted into Section 21.3.1 that directs plan users / applicants to also consider Chapter 30 – Energy and Utilities. This will ensure that the District Plan gives effect to</p>	<ul style="list-style-type: none"> ■ Add the following clause: <p><i>Attention is drawn to the following District Wide chapters, particularly Chapter 30: Energy and Utilities for any use, development or subdivision located near the National Grid. All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</i></p>

		the NPSET.	
Chapter 23 – Gibbston Character Zone			
Section 23.1 – Zone Purpose	Support with amendments	<p>The Gibbston Character Zone Purpose does not recognise that infrastructure activities are also established in the Gibbston Character Zone and have a functional, locational and operational requirement to be located in the zone. It is noted that Transpower's National Grid is currently located within this zone.</p> <p>The proposed amendments will assist in giving effect to Policies 2 and 8 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend Section 23.1: <i>The purpose of the Gibbston Character Zone is to provide primarily for viticulture and commercial activities with an affiliation to viticulture within the confined space of the Gibbston Valley. <u>It is also important to recognise that infrastructure is an established activity and has a functional, locational and operational need to be located in the Gibbston Valley. It is important that such infrastructure is enabled to be operated, maintained, upgraded and developed safely, effectively and efficiently.</u></i>
Objective 23.2.1	Support with amendments	<p>Transpower supports Objective 23.2.1 but considers that in order to protect the economic viability of the Gibbston Character Zone, regionally significant infrastructure such as the National Grid should also be enabled. The Cromwell-Frankton transmission line traverses the Gibbston Character Zone and is not only regionally important infrastructure but also nationally important. Recognition of the presence of the National Grid in this zone must be recognised and provided for.</p>	<ul style="list-style-type: none"> ■ Amend Objective: <i>Protect the economic viability, character and landscape values of the Gibbston Character Zone by enabling viticulture activities <u>and regionally significant infrastructure</u> and controlling adverse effects resulting from inappropriate activities locating in the Zone.</i>
Policy 23.2.1.7	Support with amendments	<p>Transpower supports the policy but seeks it be amended to reflect that some structures, such as a new electricity substation or line, may have a functional, operational and / or locational need to be located on skylines, ridges, hills or prominent slopes as recognised by Policy 3 of the NPSET.</p> <p>Transpower therefore seeks that the policy be amended to acknowledge that some structures may need to be located in these particular areas.</p>	<ul style="list-style-type: none"> ■ Amend Policy: <i>Avoid the location of structures and water tanks on skylines, ridges, hills and prominent slopes, <u>to the extent practicable recognising their locational, technical and functional constraints.</u></i>
Section 23.3.1 – District Wide Rules	Support with amendments	<p>Transpower acknowledges that the rules relating to land use and development in close proximity to the National Grid are provided for within Chapter 30: Energy and Utilities. Transpower supports this approach as it keeps all the rules relating to the National Grid in one</p>	<ul style="list-style-type: none"> ■ Add the following clause: <i>Attention is drawn to the following District Wide chapters, <u>particularly Chapter 30: Energy and Utilities for any use,</u></i>

		<p>chapter.</p> <p>However, Transpower is concerned that some plan users will only look within the relevant zone chapter and will therefore not consider to look within the Utilities Chapter if their land use, development or subdivision is in close proximity to the National Grid. In addition, the NPSET gives specific direction that Councils must protect the National Grid from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks an additional clause be inserted into Section 23.3.1 that directs plan users / applicants to also consider Chapter 30 – Energy and Utilities. This will ensure that the District Plan gives effect to the NPSET.</p>	<p><i><u>development or subdivision located near the National Grid.</u></i> <i>All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</i></p>
Chapter 27 – Subdivision and Development			
Objective 27.2.5	Support with amendments	<p>Transpower supports Objective 27.2.5 but there is no recognition that subdivision can lead to reverse sensitivity effects on existing infrastructure such as the National Grid.</p> <p>The amendments will assist in giving effect to Policies 10 and 11 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend Objective: <p><i>Require <u>provision of infrastructure and services are provided to lots and developments whilst ensuring that subdivision or development does not adversely affect the safe, effective or efficient functioning of regionally significant infrastructure, such as the National Grid.</u> in anticipation of the likely effects of land use activities on those lots and within overall developments.</i></p>
New Objective		<p>There is currently no recognition within Chapter 27 that subdivision can lead to reverse sensitivity effects on existing infrastructure. The National Grid should be specifically mentioned in the policy framework within Chapter 27 due to its national importance. Transpower therefore seeks a new objective to ensure that adverse effects from subdivision and land use activities are avoided.</p>	<ul style="list-style-type: none"> ■ Add a new Objective: <p><i>To avoid subdivision and the establishment of land use activities that could adversely affect (including through reverse sensitivity) the operation, maintenance, upgrading and development of regionally significant infrastructure, such as the National Grid.</i></p>

New Policy - 27.2.5.16.x		<p>While infrastructure is recognised in a broad sense in Objective 27.2.5, there is currently no policy framework to give effect to Policies 10 and 11 of the NPSET. Policies 10 and 11 of the NPSET direct Councils to manage subdivision activities to avoid adverse effects, including reverse sensitivity effects, on the National Grid.</p> <p>Transpower considers the National Grid should be specifically mentioned in the policy framework because of its national importance.</p>	<ul style="list-style-type: none"> ■ Add a new policy 27.2.5.16.x: <i><u>To manage the effects of subdivision on the safe, effective and efficient operation, maintenance, upgrading and development of the National Grid by ensuring that subdivision is managed around the National Grid to avoid subsequent land use from restricting the operation, maintenance, upgrading and development of the National Grid.</u></i>
Section 27.3.1 – District Wide Rules	Support with amendments	<p>Transpower acknowledges that the rules relating to land use and development in close proximity to the National Grid are provided for within Chapter 30: Energy and Utilities. Transpower supports this approach as it keeps all the rules relating to the National Grid in one chapter.</p> <p>However, Transpower is concerned that some plan users will only look within the relevant zone chapter and will therefore not consider to look within the Utilities Chapter if their land use, development or subdivision is in close proximity to the National Grid. In addition, the NPSET gives specific direction that Councils must protect the National Grid from adverse effects, including reverse sensitivity effects.</p> <p>Transpower therefore seeks an additional clause be inserted into Section 27.3.1 that directs plan users / applicants to also consider Chapter 30 – Energy and Utilities. This will ensure that the District Plan gives effect to the NPSET.</p>	<ul style="list-style-type: none"> ■ Add the following clause: <i>Attention is drawn to the following District Wide chapters, particularly Chapter 30: Energy and Utilities for any use, development or subdivision located near the National Grid. All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</i>
Chapter 28 – Natural Hazards			
Section 28.1 - Purpose	Support with amendments	<p>The introduction to the Natural Hazards Chapter acknowledges that avoidance of natural hazards is preferable, but mitigating effects may be the only feasible option for certain activities such as regionally significant infrastructure. In addition, mitigating effects of natural hazards can be</p>	<ul style="list-style-type: none"> ■ Amend introduction: <i>The District is recognised as being subject to multiple</i>

		costly and avoiding effects may not always be possible.	<p><i>hazards and as such, a key issue is ensuring that when development is proposed on land potentially subject to natural hazards, the risk is managed or mitigated to acceptable tolerable levels</i></p> <p><i>In instances where the risk is unacceptable intolerable, natural hazards will be required to be avoided.</i></p>
Policy 28.3.1.1	Support with amendments	<p>Transpower considers that the objective should acknowledge that effects of natural hazards may not be able to be completely avoided or mitigated. The policy needs to recognise the locational, operational and technical requirements of regionally significant infrastructure such as the National Grid. This will also assist in giving effect to the NPSET.</p> <p>All components of the National Grid are designed and constructed to withstand all natural hazard events in accordance with Civil Defence Emergency Management legislation. These include a 1:2,500 year earthquake event as well as flooding and significant snow and storm events that are likely to occur during the design working life of the asset component (minimum 50 years). Durability and resilience are critical criteria that are taken into account.</p>	<ul style="list-style-type: none"> ■ Amend Policy: <p><i>Ensure assets or infrastructure are constructed and located so as to avoid or mitigate the potential risk of damage to human life, property, infrastructural networks and other parts of the environment, <u>to the extent practicable, whilst acknowledging the locational, technical and operational requirements of regionally significant infrastructure.</u></i></p>
Policy 28.3.2.5	Support	<p>Transpower strongly supports this policy as it recognises that infrastructure such as the National Grid may have a locational, technical or operational requirement to be located on land subject to natural hazard risk. The policy also gives effect to the NPSET.</p>	<ul style="list-style-type: none"> ■ Retain Policy: <p><i>Recognise that some infrastructure will need to be located on land subject to natural hazard risk.</i></p>
Chapter 30 – Energy and Utilities			
30.1 - Purpose	Support with amendments	<p>Transpower considers that the transmission of electricity should be mentioned alongside the development of energy resources and the generation of electricity as the National Grid is nationally and regionally significant infrastructure. In addition, the ongoing operation, maintenance, development and upgrading of regionally significant infrastructure such as</p>	<ul style="list-style-type: none"> ■ Amend the opening paragraph: <p><i>Energy and Utilities are of strategic importance and require a coordinated approach in relation to the development, <u>operation, maintenance and upgrading</u> of energy resources,</i></p>

		<p>the National Grid should also be recognised and provided for in order to give effect to the NPSET.</p> <p>Transpower notes that there is a strong focus on electricity generation facilities within this chapter of the PQLDP and considers that this strong focus should also be applied to the National Grid as per the direction contained in the NPSET. Transpower acknowledges that there is a National Policy Statement for Renewable Electricity Generation which Council must give effect to within the District Plan, but equally, Council must also give effect to the NPSET. As a general comment, Transpower considers the Energy and Utilities Chapter does not give full effect to the NPSET, as currently drafted.</p>	<p><i>the generation <u>and transmission</u> of electricity and the provision of essential infrastructure throughout the District.</i></p>
30.1.2 – Utilities	Support with amendments	<p>Transpower generally supports the opening paragraphs of the Utilities chapter as it recognises that utilities are important to the servicing and functioning of the District.</p> <p>Transpower seeks minor amendments to assist in giving effect to Policies 1, 3 and 4 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Amend the opening paragraph: <p><i>Utilities have the purpose to provide a service to the public and are typically provided by a network utility operator.</i></p> <p><i>Due to the importance of utilities in providing essential services to the community, their often high capital cost to establish, and their long life expectancy; the need for the establishment and on-going <u>development, operation, functioning, maintenance and upgrading of regionally and nationally significant utilities is recognized and provided for.</u> In addition, some utilities have specific locational, technical and operational requirements needs that need to be accommodated for their operation.</i></p> <p><i>It is recognised while utilities can have national, regional and local benefits, they can also have adverse effects on surrounding land uses, some of which have been established long before the network utility. The sustainable management of natural and physical resources requires a balance between the effects of different land uses. However, it is also necessary that <u>regionally significant essential utilities are protected from development that could adversely affect (including through, where possible, from further encroachment by incompatible</u></i></p>

			<p>activities which may be subject to reverse sensitivity) effects the ability of that infrastructure to be accessed, operated, maintained, upgraded and developed. This chapter therefore also addresses requirements for sensitive uses and habitable buildings located near to utilities.</p>
Section 30.2 (including all the objectives and policies)	Support with amendments	<p>Transpower supports the objectives and policies contained within Section 30.2 but seeks that the recognition currently provided for renewable and non-renewable energy resources in Section 30.2 also be provided for the National Grid, as directed by the NPSET. Currently, half of Chapter 30 is dedicated to renewable and non-renewable energy resources with little recognition provided in the objectives and policies to the National Grid.</p> <p>Transpower therefore seeks equal recognition be provided to the National Grid. Transpower seeks this be provided via additional objectives and policies under a separate heading within Chapter 30 (as detailed below). Transpower therefore has not sought any relief in relation to the objectives and policies contained in Section 30.2 but this is on the basis that additional objectives and policies will be provided to give effect to the NPSET.</p>	<ul style="list-style-type: none"> ■ Insert the additional provisions detailed in the submission points below
Objective 30.2.5	Support	<p>Transpower supports the objective as it recognises that utilities need to be co-ordinated, as necessary, to support the growth and development of the District. Transpower considers that the objective should be expanded to also enable and protect the provision of utilities in order to support the growth and development of the District, particularly regionally significant infrastructure such as the National Grid.</p>	<ul style="list-style-type: none"> ■ Retain Objective: <p><i>Enable, protect and co-ordinate the provision of utilities as necessary to support the growth and development of the District.</i></p>
Policy 30.2.5.3	Support with amendments	<p>Transpower supports Policy 30.2.5.3 but considers it requires minor amendments to give effect to the NPSET, particularly to protect infrastructure from adverse effects (such as reverse sensitivity effects) associated with development and land use activities.</p>	<ul style="list-style-type: none"> ■ Amend Policy: <p><i>Recognise and protect existing and the future needs of utilities and by ensuring that development within utility corridors does not generate adverse effects on the utility, including the ability of the utility to be accessed, operated, maintained upgraded and/or developed, their provision in conjunction with the provider.</i></p>
Objective 30.2.6	Support with	<p>Transpower supports Objective 30.2.6 as it recognises the importance of</p>	<ul style="list-style-type: none"> ■ Amend Objective:

	amendments	utilities for the wellbeing of the community. However Transpower seeks minor amendments so the wording gives effect to the NPSET, including Policy 1, and is consistent with the terminology used in the RMA.	<i>The development, operation, establishment, efficient use and maintenance and upgrading of network utilities supports the economic and social wellbeing of the district and beyond. necessary for the well-being of the community.</i>
Policy 30.2.6.1	Support with amendments	Transpower generally supports this policy as it recognises that utilities, such as the National Grid, need protection both now and in the future. Transpower considers some small amendments to the policy would ensure consistent language with the NPSET.	<ul style="list-style-type: none"> ■ Amend Policy: <i>Recognise and provide the need for the ongoing operation, maintenance, or upgrading and development of a regionally and nationally significant network utilities <u>to ensure its on-going viability and efficiency.</u></i>
Policy 30.2.6.2	Support with amendments	Transpower supports the intent of Policy 30.2.6.2 but considers some small amendments will assist in giving effect to Policies 1, 3, 4, and 8 of the NPSET.	<ul style="list-style-type: none"> ■ Replace Policy 30.2.6.2: <i>Consider long term options and economic costs and strategic needs when considering alternative locations, sites or methods for the establishment or alteration of a utility.</i> <i><u>When considering the effects of proposed utility developments with adverse environmental effects, consideration shall be given to the consideration of alternatives, but also to how adverse effects have been managed through the route, site and method selection process while taking into account the locational, technical and operational requirements of the utility and the benefits associated with the utility.</u></i>
Policy 30.2.6.3	Support with amendments	Transpower supports Policy 30.2.6.3 but suggests minor amendments to ensure the policy gives effect to the NPSET.	<ul style="list-style-type: none"> ■ Amend Policy: <i>Encourage the co-location of facilities where operationally, <u>locationally and technically feasible.</u></i>
Policy 30.2.6.4	Support with amendments	Transpower supports Policy 30.2.6.4 as it seeks to provide for the use and development of the electricity transmission network (being the National Grid) and to protect activities from the adverse effects of the National Grid. However, Transpower seek the policy be replaced with Transpower's proposed objective and policy, which aim to avoid the	<ul style="list-style-type: none"> ■ Replace Policy 30.2.6.4 with the following objective and policy: <u>New objective:</u> <i><u>To avoid the establishment of new land use activities that</u></i>

		<p>establishment of new land use activities that could adversely affect the National Grid. This will give effect to Policy 10 of the NSPET.</p>	<p><u>could adversely affect (including through reverse sensitivity) the safe, efficient or effective operation, maintenance, upgrading and development of the National Grid.</u></p> <p><u>New policy:</u></p> <p><u>To manage the effects of subdivision, development and land use on the safe, effective and efficient operation, maintenance, upgrading and development of the National Grid by ensuring that:</u></p> <p><u>a. Areas are identified in the Plan to establish safe buffer distances for managing subdivision and land use development near the National Grid;</u></p> <p><u>b. Sensitive activities and large-scale structures are excluded from establishing within National Grid Yards and are appropriately managed around substations;</u></p> <p><u>c. Subdivision is managed around the National Grid to avoid subsequent land use from restricting the operation, maintenance, upgrading and development of the National Grid; and</u></p> <p><u>d. Changes to existing activities within a National Grid Yard and around National Grid substations do not further restrict the operation, maintenance, upgrading and development of the National Grid.</u></p> <p><u>Provide for the sustainable, secure and efficient use and development of the electricity transmission network, including within the transmission line corridor, and to protect activities from the adverse effects of the electricity transmission network, including by:</u></p> <ul style="list-style-type: none"> <u>• Controlling the proximity of buildings, structures and vegetation to existing transmission corridors</u> <u>• Discouraging sensitive activities from locating within or near to the electricity transmission National Grid Yard to minimise potential reverse sensitivity effects on the transmission network</u>
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			<ul style="list-style-type: none"> • Managing subdivision within or near to electricity transmission corridors to achieve the outcomes of this policy to facilitate good amenity and urban design outcomes • Not compromising the operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.
Policy 30.2.6.5	Support with amendments	Transpower supports Policy 30.2.6.5 but seeks minor amendments to give effect to the NPSET.	<ul style="list-style-type: none"> ■ Amend Policy: <i>Recognise and provide for existing and future the presence and function of established network utilities, and their locational, technical and operational requirements, by managing the locations and effects of land use, development and/or subdivision in locations which could compromise their on the safe, effective and efficient operation, maintenance, upgrading and development of network utilities, including reverse sensitivity effects.</i>
New Objective		<p>Transpower seeks the addition of a new objective specific to the National Grid to recognise the national significance of this infrastructure.</p> <p>The amendment will assist in giving effect to Policies 1 and 2 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Add new Objective: <i><u>To recognise and provide for the ongoing operation, maintenance, development and upgrading of the National Grid.</u></i>
Objective 30.2.7	Support with amendments	Transpower supports Objective 30.2.7 but seeks minor amendments to give effect to the NPSET.	<ul style="list-style-type: none"> ■ Amend Objective: <i>Avoid, remedy or mitigate the adverse effects <u>arising from the development, construction, operation, maintenance and upgrading of network utilities on surrounding environments, particularly those in or on land of high landscape value, and within special character areas.</u></i>
Policy 30.2.7.1	Support with amendments	Transpower supports Policy 30.2.7.1 but seeks minor amendments to give effect to the NPSET.	<ul style="list-style-type: none"> ■ Amend Policy: <i>Reduce adverse effects associated with utilities by:</i> <ul style="list-style-type: none"> ■ <i>Avoiding or mitigating, <u>where practicable</u>, their</i>

			<p><i>location on sensitive sites, including heritage and special character areas, Outstanding Natural Landscapes and Outstanding Natural Features, and skylines and ridgelines, whilst having regard to their <u>technical, operational and locational constraints and their benefits</u>:</i></p> <ul style="list-style-type: none"> ▪ <i>Encouraging co-location or multiple use of network utilities where this is efficient and practicable in order to avoid, remedy or mitigate adverse effects on the environment;</i> ▪ <i>Ensuring that redundant utilities are removed</i> ▪ <i>Using landscaping and or colours and finishes to reduce visual effects</i> ▪ <i>Integrating utilities with the surrounding environment; whether that is a rural environment or existing built form.</i>
Policy 30.2.7.3	Support with amendments	Transpower seeks the policy be amended to limit the replacement of overhead services to reticulation networks only and thus not the National Grid. The National Grid is nationally significant infrastructure and it is not always technically, locationally or operationally feasible to underground the National Grid. In addition, it is very expensive to do so.	<ul style="list-style-type: none"> ▪ Amend Policy: <p><i>Encourage the replacement of existing <u>reticulated</u> overhead services with underground reticulation or the upgrading of existing <u>reticulated</u> overhead services where technically feasible.</i></p>
Policy 30.2.7.4	Support with amendments	Transpower seeks the policy be amended to take into account the operational and technical requirements associated with regionally significant infrastructure such as the National Grid.	<ul style="list-style-type: none"> ▪ Amend Policy: <p><i>Take account of economic, <u>locational, technical</u> and operational <u>requirements</u> needs in assessing the location and external appearance of <u>network</u> utilities.</i></p>
Section 30.3.2 .1 (NESETA)	Support with amendments	Transpower acknowledges and supports the statements confirming that the respective NESs apply to telecommunications / electricity transmission activities and that no rules in the District Plan apply to activities that are managed / regulated by the NESs. Transpower seeks minor amendments to ensure consistency with the NPSET.	<ul style="list-style-type: none"> ▪ Amend Section: <p><i>Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009:</i></p> <p><i>Notwithstanding any other rules in the District Plan, the National Grid existing as at 14 January 2010 is covered by the Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009 (NESETA) and must comply with the NESETA.</i></p>

			<p>The provisions of the NESETA prevail over the provisions of this Chapter District Plan, to the extent of any inconsistency. No other rules in the District Plan that duplicate or conflict with the Standard shall apply.</p>
Section 30.3.2.3 (NZECP 34:2001)	Support with amendments	<p>Transpower supports the statements which outline the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001). However, Transpower seeks some minor amendments to clarify that NZECP applies to structures and activities near electrical lines.</p>	<ul style="list-style-type: none"> ■ Amend Section: <p><i>New Zealand Electrical Code of Practice for Electrical Safe Distances</i></p> <p><i>Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (“NZECP34:2001”) is mandatory under the Electricity Act 1992. <u>The NZECP34:2001 contains restrictions on the location of structures and activities in relation to National Grid transmission lines.</u> All activities regulated by the NZECP 34, including any activities that are otherwise permitted by the District Plan must comply with this legislation. <u>Compliance with this District Plan does not ensure compliance with NZECP34:2001.</u></i></p>
New bullet point under Section 30.3.2 (Electricity (Hazards from Trees) Regulations 2008)		<p>Transpower seeks that a new section be inserted in Section 30.3.2: National which directs users of the plan to the Electricity (Hazards from Trees) Regulations 2008. Transpower considers this is the appropriate section to insert this advice note as it is located underneath the NESETA and NZECP 34 advice notes. Transpower seeks the additional section be inserted to ensure that vegetation planted within the National Grid corridor is selected and/or managed to ensure it does not result in vegetation breaching the Electricity (Hazards from Trees) Regulations 2008.</p>	<ul style="list-style-type: none"> ■ Add new Section 30.3.2.4: <p><i><u>Electricity (Hazards from Trees) Regulations 2003</u></i></p> <p><i><u>Vegetation to be planted within the National Grid corridor should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.</u></i></p>
Section 30.3.3.3		<p>Transpower notes the statement that the utility rules take precedence over any other zone rules that may apply to utilities, except where it is specifically stated to the contrary. This provides certainty for plan users. The utilities rules do not override rules in the following chapters:</p> <ul style="list-style-type: none"> ■ Historic Heritage ■ Hazardous Substances 	<ul style="list-style-type: none"> ■ Retain the statement in 30.3.3.3 that states that the utility rules take precedence over other rules unless specified.
Insert additional		<p>Transpower seeks that an additional advice note be added to Section</p>	<ul style="list-style-type: none"> ■ Add advice note:

notes to Section 30.3.3		30.3.3 regarding vegetation planted around the National Grid.	<u>Vegetation to be planted around the National Grid should be selected and / or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.</u>
Rule 30.4.9		Transpower support Rule 30.4.9 which provides for the minor upgrading of utilities as a permitted activity with no conditions.	<ul style="list-style-type: none"> ■ Retain Rule 30.4.9
Rule 30.4.10 – Buildings and Structures within the National Grid Yard (permitted activity)	Support with amendments	<p>Transpower has recently refined its approach to managing activities in close proximity to the National Grid. The relief sought reflects Transpower's current approach to managing buildings and structures within the National Grid Yard and the National Grid Corridor. Transpower seeks a standalone rule for buildings, structures and sensitive activities in National Grid Yard as a <u>permitted activity</u> if all the applicable standards can be complied with. If any of the standards cannot be complied with, the activity status is <u>non-complying</u>. Therefore, the activity status remains the same as in the Proposed Plan but Transpower seeks minor amendments to the rules and standards.</p> <p>The proposed amendments will assist in giving effect to Policies 10 and 11 of the NPSET.</p>	<ul style="list-style-type: none"> ■ Replace Rule 30.4.10 with the following permitted activity Rule and associated standards: <ul style="list-style-type: none"> <u>Rule 30.4.10</u> <u>Buildings, Structures and Sensitive Activities in National Grid Yards:</u> <u>(a) Under the National Grid Conductors (wires), on all sites within any part of the National Grid Yard any buildings and structures must:</u> <ul style="list-style-type: none"> <u>(i) If they are for a sensitive activity, not involve an increase in the building height or footprint where alterations and additions to existing buildings occur; or</u> <u>(ii) Be a fence less than 2.5m high; or</u> <u>(iii) Be network utilities within a transport corridor or any part of electricity infrastructure that connects to the National Grid; or</u> <u>(iv) Be an uninhabitable farm building or structure for farming activities (excluding milking/dairy sheds (but not associated ancillary structures and yards), protective canopies, or factory farming buildings); or</u> <u>(v) Be artificial crop protection structures and crop support structures excluding a commercial greenhouse and protective canopies.</u>

- (b) All buildings or structures permitted by a) must comply with at least one of the following conditions:
- (i) A minimum vertical clearance of 10m below the lowest point of the conductor associated with National Grid lines; or
 - (ii) Demonstrate that safe electrical clearance distances required by NZECP34:2001 are maintained under all National Grid line operating conditions.
- (c) Buildings and structures shall be at least 12m from a National Grid support structure unless it is a:
- (i) Network Utility within a transport corridor or any part of electricity infrastructure that connects to the National Grid.
 - (ii) Fence less than 2.5m in height and more than 5m from the nearest support structure.
 - (iii) Artificial crop protection structure or crop support structure between 8 metres and 12 metres from a pole support structure that:
 - a. Meet the requirements of NZECP34:2001;
 - b. are no more than 2.5m in height;
 - c. are removable or temporary to allow a clear working space 12 metres from the pole where necessary for maintenance and emergency repair purposes, and
 - d. allow all weather access to the pole and a sufficient area for maintenance equipment, including a crane; and
 - (iv) Artificial crop protection structure or crop support structure located within 12 metres of a tower support structure if they meet the requirements of clause 2.4.1 of NZECP34:2001.

			<p><i>Buildings (that are not for National Grid Sensitive Activities), Structures and Earthworks within National Grid Corridors (subject to compliance with Rules 30.5.10 and 30.5.11)</i></p>
<p>Rule 30.5.10 – Buildings and Structures within the National Grid yard (non-complying activity)</p>	<p>Support with amendments</p>	<p>Transpower supports Rule 3.5.10, particularly its activity status of non-complying which Transpower seeks Council retain. However, as stated in the submission point above, Transpower has recently refined its approach to managing activities in close proximity to the National Grid. The relief sought reflects Transpower’s current approach to managing buildings and structures within the National Grid Yard and the National Grid Corridor.</p>	<ul style="list-style-type: none"> ■ Replace Rule 30.5.10 with the following non-complying Rule: <ul style="list-style-type: none"> <u>Rule 30.5.10</u> <u>Buildings, Structures and Sensitive Activities within the National Grid Yard are non-complying:</u> <ul style="list-style-type: none"> a) <u>Any building or addition to a building for a sensitive activity.</u> b) <u>Any change of use to a sensitive activity or the establishment of a new sensitive activity.</u> c) <u>Dairy/milking sheds or buildings (excluding associated ancillary structures and yards) factory farm buildings, protective canopies, and commercial greenhouses.</u> d) <u>Hazardous facility.</u> e) <u>Any building or structure not permitted by Rule 30.4.10.</u> ■ Add a notification statement to the new non-complying activity status: <p><u>Where an activity requires resource consent solely because it is within a National Grid Corridor, National Grid Yard or around a National Grid substation then the application need not be publicly notified and need not be served on any affected party other than Transpower New Zealand Limited.</u></p> <p><i>Buildings and Structures within the National Grid Yard being:</i></p> <p><i>30.5.10.1 A non-conductive fence located 5m or more from any National Grid Support Structure and no more than 2.5m in height.</i></p> <p><i>30.5.10.2 Any utility within a transport corridor or any part of electricity infrastructure that connects to the National Grid.</i></p> <p><i>30.5.10.3 Any new non-habitable building less than 2.5m</i></p>

			<p>high and 10m² in floor area.</p> <p>30.5.10.4 Any non-habitable building or structure used for agricultural activities provided that they are:</p> <p>a. less than 2.5m high</p> <p>b. Located at least 12m from a National Grid Support Structure</p> <p>c. Not a milking shed/dairy shed (excluding the stockyards and ancillary platforms), or a commercial glasshouse.</p> <p>30.5.10.5 Alterations to existing buildings that do not alter the building envelope.</p> <p>Note – Refer to the Definitions for illustration of the National Grid Yard.</p>
Rule 30.4.11 – Lines and Supporting Structures	Support with amendments	Transpower supports Rule 30.4.11 but considers that a permitted activity rule is appropriate which allows construction of electricity lines (provided they have a voltage equal or less than 110kV). This would allow for support structures and additional lines. Transpower considers this more appropriate and is consistent with other District Plans in New Zealand.	<p>■ Replace Rules 30.4.11 and 30.4.12 with the following Rules:</p> <p><u>Rule 30.4.11</u> <u>The construction and maintenance of the following network utilities are a permitted activity provided they meet the following standards:</u></p> <p>a) <u>Any new electricity lines and associated transformers shall be limited to a voltage up to and including 110kV.</u></p> <p>b) <u>Maintenance of any existing line.</u></p> <p>c) <u>Any trimming or removal of any vegetation that is required to maintain safe separation distances or the ongoing efficient operation of the line.</u></p> <p>d) <u>In the case of poles and towers, these shall comply with a maximum height of:</u></p> <p>i. <u>20 metres in Rural or Industrial Zones.</u></p> <p>ii. <u>12 metres in any Residential Zone.</u></p> <p><u>Rule 30.4.12</u> <u>Any activity that does not comply with the standards specified in Rule 30.4.11 is a controlled activity.</u></p> <p>A conductor line, or support structure for overhead lines, to convey electricity (at a voltage of equal to or less than 110kV at a capacity of equal to or less than 100MVA); or overhead lines</p>

			<p>for any other purpose including telecommunications.</p> <p>Control is reserved to all of the following:</p> <ul style="list-style-type: none"> • Location • Route • Height • Appearance, scale and visual effects • Where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: an assessment by a suitably qualified person is provided that addresses the nature and degree of risk the hazard(s) pose to people and property, whether the proposal will alter the risk to any site, and the extent to which such risk can be avoided or sufficiently mitigated.
Rule 30.5.11 – Earthworks within the National Grid Yard	Support with amendments	<p>Transpower supports the inclusion of a rule specifically for earthworks located within the National Grid Yard as this gives effect to the NPSET. Transpower has recently refined its approach to managing earthworks in the National Grid Yard and therefore seeks some minor amendments to the wording proposed in Rule 30.5.11. Transpower seeks a permitted activity rule with associated conditions, a restricted discretionary activity and then a non-complying rule</p> <p>Transpower also strongly supports earthworks being a permitted activity and defaulting to a non-complying activity if any of the standards cannot be met.</p>	<ul style="list-style-type: none"> ■ Replace Rule 30.5.11 with the following rules <p><u>Rule 30.5.11</u> <u>Earthworks within the National Grid Yard are permitted activities, subject to compliance with the following standards:</u></p> <ol style="list-style-type: none"> a) <u>Shall be no deeper than 300mm within 12m of any National Grid support structure foundation</u> b) <u>Shall not compromise the stability of a National Grid support structure; and</u> c) <u>Shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 of NZECP34.</u> <p><u>Provided that, the following are exempt from point (a) above:</u></p> <ul style="list-style-type: none"> • <u>Earthworks for a Network Utility within a transport corridor, as part of a transmission activity, or for electricity infrastructure; or</u> • <u>Earthworks undertaken as part of agricultural or domestic cultivation, or repair, sealing or resealing of a road, footpath, driveway or farm track.</u> • <u>Vertical holes not exceeding 500mm in diameter are exempt provided they are:</u> <ol style="list-style-type: none"> i. <u>more than 1.5m from the outer edge of pole support</u>

			<p><u>structure or stay wire; or</u></p> <p>ii. <u>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.</u></p> <p>Add a new Restricted Discretionary Rule:</p> <p><u>Rule 30.5.12</u> <u>Within the National Grid Yard:</u></p> <p>a) <u>Any earthworks not permitted by Rule 30.5.11 (a) above is a restricted discretionary activity.</u></p> <p><u>Matters of Discretion:</u></p> <p>a) <u>Impacts on the operation, maintenance, upgrade and development of the National Grid.</u></p> <p>b) <u>Compliance with NZECP34:2001.</u></p> <p>c) <u>Technical details of the characteristics and risks on and from the National Grid infrastructure.</u></p> <p>d) <u>The risk to the structural integrity of the National Grid.</u></p> <p>e) <u>Any impact on the ability of the National Grid owner (Transpower) to access the National Grid.</u></p> <p>f) <u>The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u></p> <p>Add a new Non-Complying Rule:</p> <p><u>Rule 30.5.13</u> <u>Within the National Grid Yard:</u></p> <p>g) <u>Any earthworks not permitted by Rules 30.5.11(b) and (c) above is a non-complying activity.</u></p>
New Rule 30.5.12		<p>Transpower seeks a new restricted discretionary activity status for any building or intensive development located within 150m of the secured yard of a National Grid substation. The purpose of this rule is to protect the existing Frankton substation from reverse sensitivity effects.</p> <p>The amendments will assist in giving effect to Policies 10 and 11 of the</p>	<p>■ Add a new Restricted Discretionary Rule:</p> <p><u>Rule 30.5.14</u> <u>Any building, sensitive activity, hazardous facility or intensive development within 150m of the designated boundary (or secured yard) of a National Grid substation, with matters of discretion restricted to</u></p>

		NPSET.	<ul style="list-style-type: none"> a) <u>The extent to which the development may adversely affect the efficient operation, maintenance, upgrading and development of the substation.</u> b) <u>The extent to which the proposed development design and layout enables appropriate separation distances between activities sensitive to National Grid lines and the substation.</u> c) <u>The results of any detailed investigations to determine appropriate separation distances between activities sensitive to National Grid lines and the substation.</u> d) <u>Any other measures proposed to avoid or mitigate potential adverse effects, including reverse sensitivity effects, on the substation.</u> e) <u>The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u>
New Rule – Subdivision		<p>Transpower requests a new rule be inserted which protects the National Grid from subdivision activities in close proximity to the National Grid. This is consistent with the NPSET which directs Councils to protect the National Grid from adverse effects, such as reverse sensitivity effects.</p>	<ul style="list-style-type: none"> ■ Add new Rules: <p><u>Rule 30.5.15</u> <u>Subdivision of land in any zone within the National Grid Subdivision Corridor is a restricted discretionary activity if it complies with the following standard:</u></p> <ul style="list-style-type: none"> a) <u>All allotments shall identify a building platform for the principal building and any dwelling, to be located outside the National Grid Yard.</u> <p><u>Matters of Discretion:</u></p> <ul style="list-style-type: none"> a) <u>Impacts on the operation, maintenance, upgrade and development of the National Grid.</u> b) <u>The ability of future development to comply with NZECP34:2001.</u> c) <u>Technical details of the characteristics and risks on and from the National Grid infrastructure.</u> d) <u>The ability of the applicant to provide a complying building platform.</u> e) <u>Location, design and use of the proposed building platform or structure as it relates to the National Grid transmission line.</u>

			<p>f) <u>The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u></p> <p>g) <u>The nature and location of any vegetation to be planted in the vicinity of the National Grid transmission lines.</u></p> <ul style="list-style-type: none"> ■ Add new Rule: <p><u>Rule 30.5.16</u> <u>Any subdivision of land in any zone within the National Grid Subdivision Corridor which does not comply with the restricted discretionary activity standard (a) under Rule 1 is a non-complying activity."</u></p>
Chapter 33 – Indigenous Vegetation and Biodiversity			
Policy 33.2.1.5	Support with amendments	Transpower seeks that the policy be amended to recognise that infrastructure activities, such as the National Grid, are also anticipated within the Rural area. Transpower's National Grid is located within areas zoned Rural within the District and therefore the policy needs to acknowledge that not only farming activities are anticipated in this zone.	<ul style="list-style-type: none"> ■ Amend Policy: <p><i>Recognise anticipated activities in rural areas such as farming and regionally significant infrastructure, and the efficient use of land and resources while having regard to the maintenance, protection or enhancement of indigenous biodiversity values.</i></p>
Policy 33.2.1.8	Oppose	Transpower does not support the inclusion of off-sets in the Plan to the extent they become a requirement of, or are written into, the chapter (or wider) Plan. Transpower considers that offsets sit outside of the RMA framework.	<ul style="list-style-type: none"> ■ Delete Policy: <p><i>Where the adverse effects of an activity on indigenous biodiversity cannot be avoided, remedied or mitigated, consideration will be given to whether there has been any compensation or biodiversity offset proposed and the extent to which any offset will result in a net indigenous biodiversity gain.</i></p>
Policy 33.2.2.1	Oppose in part	Transpower opposes the use of the term 'avoid' as effects need to be managed to avoid, remedy or mitigate effects, and must also be balanced	<ul style="list-style-type: none"> ■ Amend Policy:

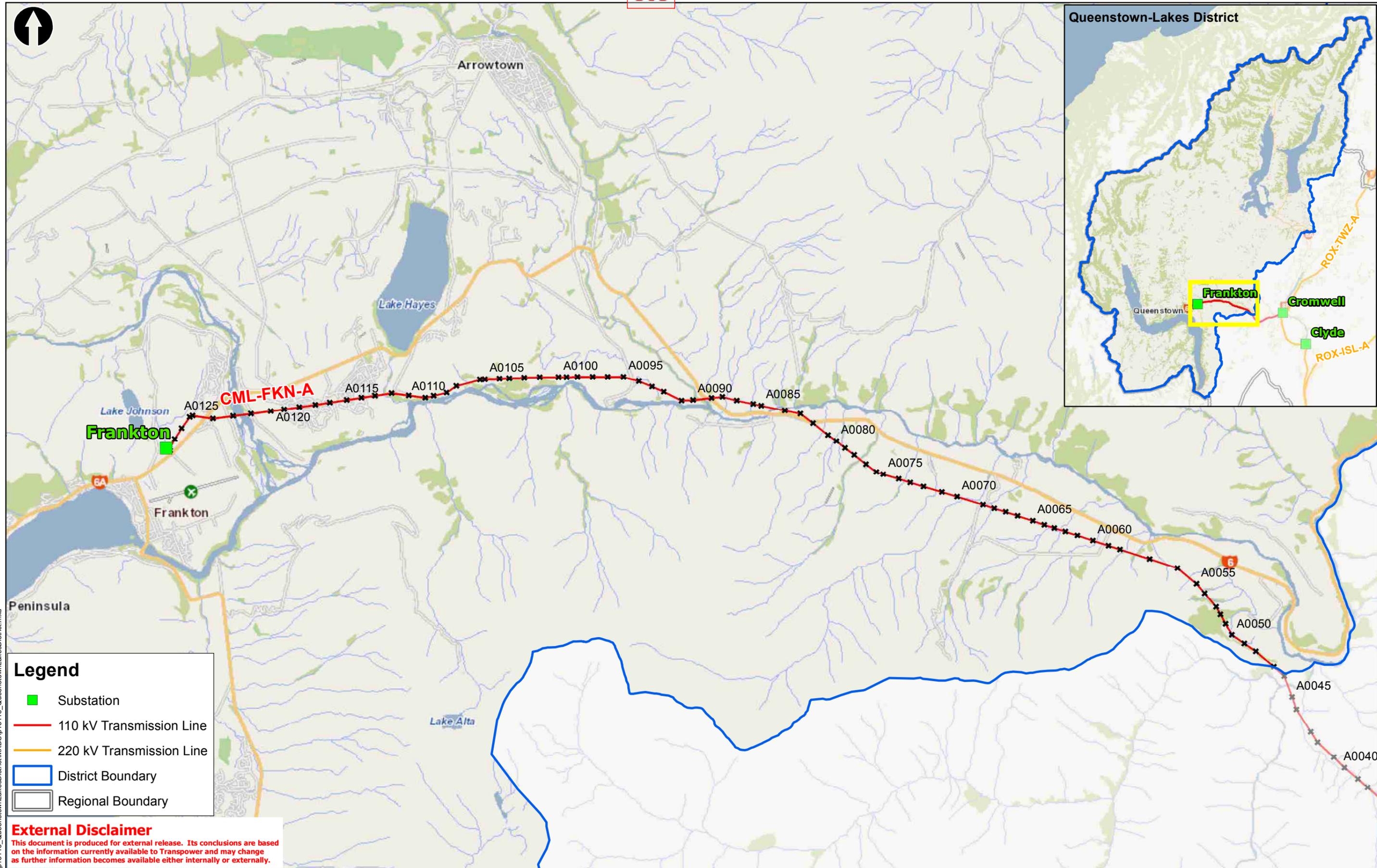
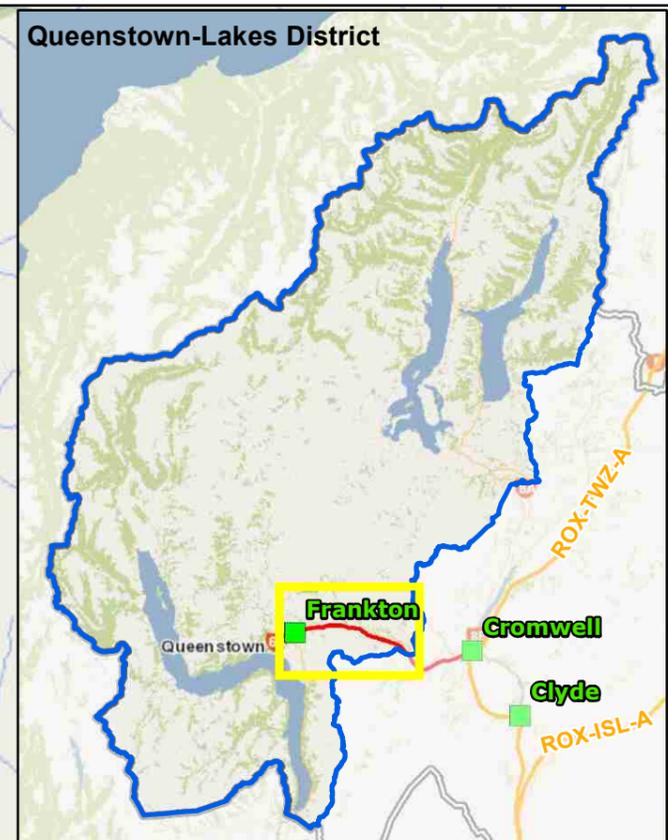
		against other nationally important matters such as the operation, maintenance, upgrade or development of the National Grid. The sole use of the word 'avoid' introduces what is in effect a 'bottom line' which is not consistent with the RMA and effects-based planning. Furthermore, 'avoidance' (and also remediation and mitigation) should be focused on the values and attributes of the biodiversity values. The focus should not be on protecting it from all effects, including those that have no impact on biodiversity values	<i>Avoid, or where this is not practicable, remedy or mitigate the effects associated with the clearance of indigenous vegetation within Significant Natural Areas that would reduce indigenous biodiversity values.</i>
Section 33.3.2		Transpower seeks an additional clarification point be added which clarifies that Outstanding Natural Landscapes / Significant Natural Areas are not considered 'natural areas' for the purposes of the NESETA. Transpower needs to easily be able to trim and prune trees as they can cause fire hazards to the National Grid if not adequately maintained.	<ul style="list-style-type: none"> ■ New clarification point: <i><u>Outstanding Natural Landscapes and Significant Natural Areas are not considered to be 'natural areas' for the purposes of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA).</u></i>
Section 33.3.4.2	Support	Transpower supports Section 33.3.4.2 as it recognises that operational utilities, such as the National Grid, are exempt from the indigenous vegetation clearance rules.	<ul style="list-style-type: none"> ■ Retain Section 33.3.4.2 <i>Indigenous vegetation clearance for the operation and maintenance of existing and in service / operational roads, tracks, drains, utilities, structures and/or fence lines, but excludes their expansion.</i>

Chapter 37 – Designations

Designation Number 1	Support	Transpower supports designation number 1 which provides for Transpower's Frankton substation. Transpower notes that the details are correct and thus seek the designation is retained, as notified.	<ul style="list-style-type: none"> ■ Retain designation
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Planning Maps

<p>Planning Maps (specifically maps 13, 15, 30 and 31)</p>	<p>Support with amendments</p>	<p>Transpower acknowledges and strongly supports the inclusion of the National Grid transmission lines on the Planning Maps as this is consistent with Policy 12 of the NPSET.</p> <p>Transpower seeks minor amendments to the terminology used in relation to the National Grid on the planning maps to ensure consistency with the NPSET and NESETA. The Cromwell – Frankton A line consists of 128 towers as per the definition provided in the NESETA. Transpower therefore seeks that the maps refer to “National Grid support structures” rather than “Transpower Pylons”. This will reduce any confusion for users of the plan as “pylon” is not a term used in the NPSET or NESETA.</p> <p>In addition, Transpower seek that the transmission line be identified as the “National Grid transmission line” rather than “Transmission Corridor” as it is the electricity line rather than a “corridor” that has been identified.</p> <p>Transpower notes that there is a gap on planning map 31 where there is no transmission line or support structures identified (where the National Grid crosses the Frankton-Ladies Mile Highway and then the Shotover River). Transpower has attached a map to this submission which identifies the existing National Grid. In addition, planning maps 13 and 15a identifies the National Grid transmission line but does not contain any support structures.</p> <p>Transpower also seeks that the Frankton substation be identified as ‘Transpower Substation’ rather than ‘Transpower AC Substation’.</p>	<p>■ Amend:</p> <p>Legend:</p> <ul style="list-style-type: none"> • National Grid support structures <i>Transpower Pylons</i> • National Grid transmission line <i>Corridor</i> • Transpower AC <i>Substation</i> <p><i>Insert the missing Transpower support structures and National Grid transmission line on planning map 31</i></p>
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Legend

- Substation
- 110 kV Transmission Line
- 220 kV Transmission Line
- District Boundary
- Regional Boundary

External Disclaimer
 This document is produced for external release. Its conclusions are based on the information currently available to Transpower and may change as further information becomes available either internally or externally.

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