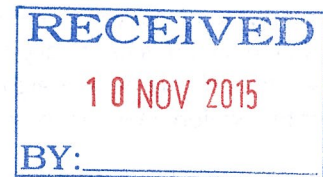


2NN 6


Submission by Transpower New Zealand Limited on the Proposed Christchurch Replacement District Plan: Residential New Neighbourhoods Zones



10 November 2015

Keeping the energy flowing





Submission on the Proposed Christchurch Replacement District Plan under Clause 6 of Schedule 1, Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

To Christchurch City 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. 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. The role of the National Grid is to enable New Zealand to achieve its international and local aspirations.¹

The National Grid has operational requirements and engineering constraints that dictate and constrain the way it is operated, maintained, upgraded and developed.² Transpower, as the owner or operator of the National Grid, has a significant interest in Christchurch with assets including towers, lines, cables, substations and ancillary infrastructure in the jurisdiction of the Council. Specifically, the Islington – Southbrook A (ISL-SBK A) 66kV transmission line traverses the area of land subject to the New Neighbourhood South Masham Outline Development Plan (shown on the Appendix 8.6.5 plan).

Transpower is making this submission in accordance with Clause 6 of Schedule 1, Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014.

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

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

Residential New Neighbourhood South Masham Outline Development Plan and accompanying documentation.

Transpower's submission is:

The National Grid is nationally 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 NPSET sits near the top of the policy hierarchy 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 environment effects of the National Grid; and managing the adverse effects of third parties on the National Grid. The NPSET only applies to assets that are owned and operated by Transpower.

The Christchurch Replacement District Plan (**Replacement Plan**) proposals, and specifically the Residential New Neighbourhood South Masham Outline Development Plan and accompanying documentation, are required to:

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

² 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.

- (a) give effect to the provisions of the NPSET (RMA section 75(3)(a)); and
- (b) not conflict with or duplicate the provisions of the NESETA.

In this regard Transpower **supports** the inclusion of the Islington Substation is shown outside the south boundary of the proposed South Masham Outline Development Plan and seeks that this be maintained to assist with acknowledging its location and importance. This substation is the central node for electricity supply to the upper South Island and Transpower has recently purchased additional land adjacent to the Substation at Pound Road for possible diversification, and security of supply, upgrades. D1

Transpower also **supports in part** the identification of the Islington –Southbrook A (ISL-SBK) transmission line is shown on the South Masham Outline Development Plan. However, Transpower seeks that the transmission line is clearly identified as being part of the National Grid, so that Plan users can understand that the NPSET and NESETA are relevant to works associated with, and in the vicinity of, the transmission line.

Transpower **opposes** the South Masham Outline Development Plan to the extent that it applies “residential development area with greater development constraints” and “area to be quarried” to the land that is traversed by the transmission line. It is considered that this inappropriately signals a potential land use that is inconsistent with:

- (a) Policies 10 and 11 of the NPSET;
- (b) Policies 16.3.4 and 6.3.5 of the Canterbury Regional Policy Statement;
- (c) The approach taken to the distribution lines that also traverse the Outline Development Plan area (open space, stormwater and utility reserve);
- (d) The approach taken to the protection of strategic infrastructure, including the National Grid elsewhere in the Replacement Plan.

Transpower acknowledges and **supports in part** the inclusion of the National Grid corridor protection provisions for subdivision (via Rule 8.2.2.4(NC1)) and land use (via Rule 14.6.2.5(NC2)) including in the 15 September 2015 version of the New Neighbourhood Zone provisions, however, Transpower is concerned that the most recent revision of these provisions (dated 9 November 2015) make reference to distribution lines only. In order to give effect to Policies 10 and 11 of the NPSET, Transpower seeks that Rule 14.6.2.5 in the 9 November version be amended to:

- (a) Include provisions that establishes a protective corridor for the National Grid transmission lines in the Rule 14.6.2.5 in a similar manner to those agreed in relation to the rest of Proposal 14;
- (b) include quarrying activities, alongside sensitive activities and buildings, in such a rule.

Transpower New Zealand Limited seeks the following decision from the hearings panel:

- Clear identification of the Islington –Southbrook A (ISL-SBK) transmission line as part of the National Grid on the South Masham Outline Development Plan, including a corridor that better indicates the activities anticipated in the vicinity of the National Grid; D2
- The inclusion of a new non-complying rule that establishes a protective corridor for the National Grid transmission lines in the Rule 14.6.2.5 in a similar manner to those agreed in relation to the rest of Proposal 14; D3

- Include quarrying activities, alongside sensitive activities and buildings, in the new non-comply rule in 14.6.2.5;
- such further, alternative or consequential relief as may be necessary to fully give effect to this submission and therefore the NPSET.

D4
DS

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

If others make a similar submission, Transpower will consider presenting a joint case with them at a hearing.

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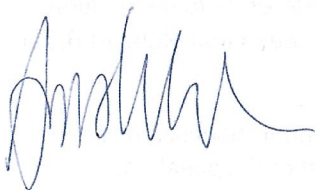
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**Signature of the person authorised to sign
on behalf of Transpower New Zealand Limited**

10 November 2015
Date