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Submission by Transpower New Zealand Limited on the Proposed Christchurch Replacement District Plan: Temporary Earthquake Recovery Activities

20 March 2015

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

To Christchurch City Council (the 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 Christchurch City 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, secure, supply of electricity.

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 proposal that this submission relates to are:

Transpower's submission is in relation to the following Proposals:

Proposal 6A(i): Displaced activities, storage facilities and construction depots outside the Central City

Proposal 6A(ii): Displaced activities, storage facilities and construction depots within the Central City

Proposal 6C(i): Workers' temporary accommodation outside the Central City

Transpower's submission is:

The specific details of Transpower's submission, and decisions sought in relation to the provisions contained in these Proposals are included in the following tables. The relief that Transpower is seeking will give effect to Policies 10 and 11 of the National Policy Statement on Electricity Transmission 2008 (NPSET).

This submission should be read in conjunction with the original submission made by Transpower in relation to Phase 1 Proposals of the Christchurch Replacement District Plan (the Replacement Plan) (dated 8 October 2014). The original submission provides relevant background information in relation to:

- The National Grid and Transpower's assets in Christchurch;
- The NPSET;

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

- The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA); and
- Transpower's overarching approach to the Replacement Plan, including how the Replacement Plan can give effect to the NPSET and manage effects on the National Grid.

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

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

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

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

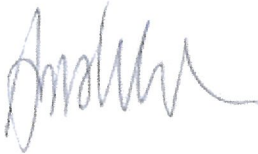
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**Signature of the person authorised to sign
on behalf of Transpower New Zealand Limited**

20 March 2015
Date

Plan Provision	Support/Oppose/Amend	Submission/Reasons	Decision sought												
6.4.3.2.1 Permitted activities: Activity specific standards P2x, P3s, P4p, P5u, P6m and P7n	Support	Transpower supports the activity specific standards in Rule 6.4.3.2.1 that require separation of activities and buildings from the National Grid because the standards provide for public health and safety, as well as the continued ability to operate, maintain, upgrade and/or develop the National Grid. The standards ensure an appropriate separation between temporary activities and the National Grid will be maintained which will give effect to Policies 10 and 11 of the NPSET. The proposed standards are a simplified version of Rules promoted elsewhere in Transpower's submission on Phase 1 of the District Plan Review. It will provide for straightforward interpretation given the temporary nature of the activities and enabling purpose of the provisions. The proposed provisions are also consistent with Decision 2 made by the Hearings Panel in relation to Proposal 6.	Retain Rule 6.4.3.2.1 (P2x, P3s, P4p, P5u, P6m and P7n) as notified. <table border="0"> <tr><td>P2x</td><td>1607.1</td></tr> <tr><td>P3s</td><td>1607.2</td></tr> <tr><td>P4p</td><td>1607.3</td></tr> <tr><td>P5u</td><td>1607.4</td></tr> <tr><td>P6m</td><td>1607.5</td></tr> <tr><td>P7n</td><td>1607.6</td></tr> </table>	P2x	1607.1	P3s	1607.2	P4p	1607.3	P5u	1607.4	P6m	1607.5	P7n	1607.6
P2x	1607.1														
P3s	1607.2														
P4p	1607.3														
P5u	1607.4														
P6m	1607.5														
P7n	1607.6														
6.4.3.2.2 Restricted discretionary activities: RD7 6.4.2.2.4 Non-complying activities	Support with amendment	Rule RD7 provides for construction depots in Rural Area or the "Residential Red Zone" Overlay as a restricted discretionary activity. Transpower seeks an amendment to ensure that buildings and activities associated with construction depots (such as mobile plant) will not be located in close proximity to the National Grid. Such activities could pose a health and safety risk to and have the potential to compromise the operation, maintenance, upgrading and development of the National Grid. In such situations Rule RD7 would not give effect to Policies 10 and 11 of the NPSET. On that basis, Transpower seeks an amendment to the Rule to provide for adequate separation from the National Grid.	Amend Rule 6.4.3.2.2 RD7(a) as follows (amendments shown in red): <p>1607.7</p> <p>a. Construction depot until the 30 April 2018, located in a Rural Area or the "Residential Red Zone" Overlay indicated in Appendix 6.1 (excluding Conservation Areas within the "Residential Red Zone" Overlay), which is used for construction work (as defined in section 6 of the Construction Contracts Act 2002) to repair or rebuild land, buildings, infrastructure or other facilities damaged by the Canterbury Earthquake, and which is located greater than 12 metres from the centre line of a National Grid transmission line and greater than 12 metres from the outer edge of the foundation of a National Grid line's support structure.</p> <p>As a consequence amend the matters of discretion that apply to RD7 by deleting clause f.</p> <p>1607.8</p> <p>And amend 6.4.2.2.4 Non-complying activities to provide for situations where construction depots are located within 12 metres of the National Grid.</p> <p>1607.9</p>												

Plan Provision	Support/Oppose/Amend	Submission/Reasons	Decision sought
<p>6.4.2.2.4 Non-complying activities</p> <p>NC1</p>	<p>Support with amendment</p>	<p>Transpower supports the default to non-complying activity status in situations where the temporary activities do not meet the activity specific standards. Non-complying activity status is appropriate where certain activities seek to locate in close proximity to the National Grid and is consistent with the approach taken elsewhere in the Replacement Plan and in Transpower's submission on Stage 1 of the District Plan Review.</p> <p>It is noted that the wording of this rule omits reference to P7. An amendment is therefore requested to include P7.</p>	<p>Amend Rule 6.4.2.2.4 (NC1) to include P7 (amendments shown in red):</p> <p><i>"Activities P2 to P6P7 listed in 6.4.3.2.1 that do not comply with activity specific standards P2 x, P3 s, P4 p, P5 u, P6 m and P7 n (Setback from the National Grid lines and support structures)."</i></p> <p>1607.10</p>
<p>Proposal 6A(ii): 13.13.1.1 Rules - Temporary earthquake recovery activities – displaced activities, storage facilities and construction depots within the Central City</p>			
<p>13.13.1.1.2.1 Permitted activities: Activity specific standards P2w, P3s, P4t, P5m and P6n</p> <p>13.13.1.1.2.4 Non-complying activities</p>	<p>Oppose</p>	<p>The activity specific standard in Rule 13.13.1.1.2.1 provides setbacks from the National Grid transmission lines and support structures within the Central City. Transpower seeks the deletion of these standards because they are not necessary for the following reasons:</p> <ul style="list-style-type: none"> There are no National Grid transmission lines that traverse the Central City; and Transpower has no plans to construct transmission lines in the Central City in the future. 	<p>Delete Rule 13.13.1.1.2.1 (P2w, P3s, P4t, P5m and P6n).</p> <p><i>1607.15 1607.11 1607.12 1607.13</i></p> <p>As a consequence delete Rule 13.13.1.1.2.4 (NC1).</p> <p><i>1607.16</i></p>
<p>Proposal 6C(i): 6.4.5 Workers' Temporary Accommodation Outside the Central City</p>			
<p>6.4.5.2.4 Non-complying Activities</p>	<p>Oppose</p>	<p>The Rules in 6.4.5 do not give effect to Policies 10 and 11 of NPSET because they do not address the potential for activities and buildings associated with workers' temporary accommodation to be located in close proximity to the National Grid. Such activities could pose a health and safety risk to and have the potential to compromise the operation, maintenance, upgrading and development of the National Grid. On that basis, Transpower seeks an amendment to Rule 6.4.5.2.4 to provide for adequate separation from the National Grid.</p>	<p>Amend Rule 6.4.5.2.4 to include the following rule:</p> <p><i>"NC5 – Worker's temporary accommodation, including any temporary buildings and accessory buildings, located within 12 metres of the centre line of a National Grid transmission line and within 12 metres of the outer edge of the foundation of a National Grid line's support structure."</i></p> <p>1607.17</p>