



Keeping the energy flowing

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Dear Chris

Rural Residential Strategy - Consultation Draft

Thank you for the opportunity for Transpower New Zealand Limited (Transpower) to comment on the Selwyn District Council Rural Residential Strategy 2013 – Consultation Draft ('RRS13').

Transpower understands that RRS13 is at consultation draft stage and has been prepared in response to requirements under the Land Use Recovery Plan. RRS13 proposes an initial policy position and preliminary locations for rural residential development in the District, comprising 356 allotments adjoining the township boundaries of Rolleston, Lincoln, Prebbleton and West Melton which will be rezoned to Living 3 Zone.

As you will be familiar with from previous submissions, Transpower is the State Owned Enterprise that owns, maintains, operates and develops New Zealand's high voltage transmission network, the National Grid. The National Grid comprises of a network of steel towers, poles, lines and substations which transports the electricity generated by power stations to the distribution networks (and some intensive electricity consumers) of each region, which in turn conveys electricity energy to domestic, commercial and industrial users in the region.

The following high voltage transmission line assets are located within the Selwyn District:

- Coleridge Brackendale D (COL-BKD-D) 66kV line on poles
- Coleridge Otira A (COL-OTI-A) 66kV line on towers and poles
- Brackendale Hororata A (BKD-HOR-A) 66kV line on towers
- Islington Springston A (ISL-SPN-A) 66kV line on towers
- Hororata Islington E (HOR-ISL-E) 110kV line on poles
- Benmore Islington A (BEN-ISL-A) 220kV line on towers
- Roxburg Islington A (ROX-ISL-A) 220kV line on towers
- Christchurch Twizel A (CCH-TWZ-A) 220kV line on towers
- Bromley Islington A (BRY-ISL-A) 220kV line on towers
- Benmore Haywards A (BEN-HAY-A) 350kV direct current line on towers
- Coleridge, Hororata and Springston substations.

The National Grid is, on the whole, not protected by designations or easements and is therefore vulnerable to the adverse effects of land use changes. More intensive subdivision and changing land use activities (including rural residential development) is of particular interest and concern for Transpower as incompatible development and activities in the immediate vicinity of existing National Grid network infrastructure pose a risk to, or can be at risk from, the efficient operation of the network.

The effects of activities carried out by others beneath the National Gridlines and within encroachment areas represent the single most significant risk to existing National Grid corridors. Development and/or activities within the National Grid corridor can raise concern regarding amenity and actual or perceived health and safety issues, and result in an increased risk to both the safety of people and property and the operation of the network. Encroachment may also restrict the future upgrading of existing infrastructure, which could restrict the ability of the National Grid to meet increasing energy demands.

The National Policy Statement on Electricity Transmission 2008 (NPSET) confirms the national significance of the National Grid and the need to appropriately manage activities and development close to it. The NPSET establishes national policy direction to recognise the benefits of the National Grid. It recognises the importance of security of supply for the well-being of New Zealand and New Zealanders, and makes it explicit that the National Grid is to be considered a matter of national significance under the RMA in order to meet the electricity needs of present and future generations.

In response to developing criteria to identify 'preferred locations' for rural-residential development and activities in the Selwyn District, Transpower considers it appropriate that the existing National Grid infrastructure be identified as a constraint for development occurring in 'less favorable locations'.

RRS13 will need to give effect to the NPSET and in particular to:

- Ensure and protect the ability for ongoing operation, upgrading, development and maintenance of the network;
- Enable the existing network to be upgraded in order to meet growth in power demand; and
- Protect the existing network from the activities of others.

The issue of the effects of activities carried out by others on the safe and secure operation of the National Grid has been recognised in the development of the NPSET, most specifically in Policies 10 and 11.

This is consistent with the Regional Policy Statement, specifically Objective 5.2.2(2)(a) Integration of Land Use and Regionally Significant Infrastructure, Policy 5.3.2 Development Conditions (Wider Region), Policy 5.3.9 Regionally Significant Infrastructure (Wider Region), and Method 5.3.9(4)(b) in that the location of development is to avoid adverse effects on the operation, use and development of regionally significant infrastructure.

Selwyn District Council is currently preparing a Plan Change to give effect to the NPSET which will address the issues relating to development within National Grid more comprehensively throughout the entire Selwyn District.



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Under the notified version of RRS13, National Grid assets are located within the 'Preliminary Area 2' which identifies for rural residential intensification in West Melton. The Benmore - Islington A 220kV transmission line traverses the southern portion of Area 2 in a west-east direction and includes tower 658, as shown on the attached map. Transpower is not opposed to rezoning in this area, provided that the potential adverse effects on National Grid infrastructure are managed appropriately.

Transpower looks forward to continuing to work with Selwyn District Council to ensure the NPSET policies are incorporated into the planning framework for managing rural residential development in Selwyn under RRS13, and will address rezoning rules at the appropriate time whether this is district-wide or only in relation to the areas identified under RRS13.

Please contact me on (04) 590 7698 if you have any questions with regard to these preliminary comments on RRS13.

Yours sincerely

TRANSPOWER NEW ZEALAND LIMITED

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