

# Submission by Transpower New Zealand Limited

## Notice of Requirement for Designation by the Selwyn District Council – Proposed Prebbleton Recreation Reserve (D200088)

17 July 2020

*Keeping the energy flowing*



## Form 21

### Notice of Submission on an Application for Designation

#### Resource Management Act 1991

To Selwyn District Council (“the Council”)

[submissions@selwyn.govt.nz](mailto:submissions@selwyn.govt.nz)

**Name of submitter:** Transpower New Zealand Limited (“Transpower”)

**This is a submission on:**

Notice of Requirement for Designation - Proposed Prebbleton Recreation Reserve (D200088) (“**NoR D88**”)

*Application Reference Number: D200088*

*Name of Applicant (state full name): Selwyn District Council*

*Application Site Address: 27 Hamptons Road, Prebbleton*

*Description of Proposed Activity: To designate land for recreation reserve purposes to provide additional land that is necessary to meet the demands of the Prebbleton and Selwyn communities*

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

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

The proposal insofar as it relates to the National Grid, and particularly the extent to which the provisions give effect to the National Policy Statement on Electricity Transmission 2008.

**Transpower’s submission is:**

As follows -

### Background and National Significance of the National Grid

Transpower is the State-Owned Enterprise that plans, builds, maintains, owns and operates New Zealand’s electricity transmission network, the National Grid. The National Grid links generators to distribution companies and major industrial users and comprises around 12,000 kilometres of transmission lines and over 160 substations.

The national significance of the National Grid is recognised, in the context of the Resource Management Act 1991 (‘**RMA**’), by the National Policy Statement on Electricity Transmission (2008) (the ‘**NPSET**’).

National policy statements are at the top of the hierarchy of planning instruments under the RMA. The NPSET sets a clear directive to councils and decision makers on how to provide for National Grid resources (including future activities).

The NPSET confirms the national significance of the National Grid and establishes a clear national policy direction that recognises the benefits of electricity transmission, the effects of and on the

National Grid, and the need to appropriately manage activities and development under and in close proximity to it.

The one 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:*

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

This objective recognises that the electricity transmission network itself potentially gives rise to adverse effects, and, conversely, that other activities can potentially adversely affect the network. The NPSET's 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid.

The policies must be applied by both Transpower and decision-makers under the RMA, as relevant. Of specific relevance to NoR D88, Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for the NoR to address.

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.*

Policy 11 relates to the development of buffer corridors, and 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).*

## **Transpower's interest in Notice of Requirement for Designation - Proposed Prebbleton Reserve (D200088)**

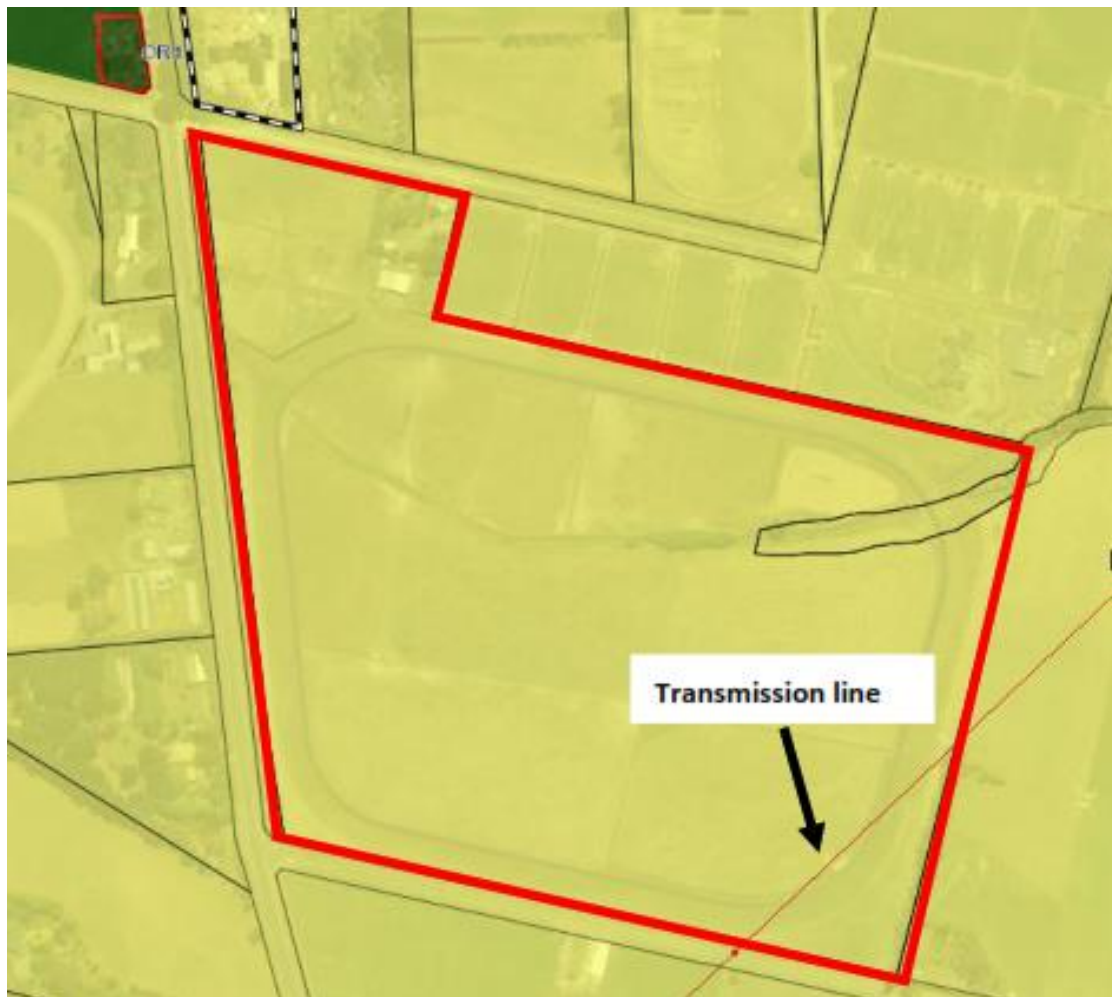
As outlined in the Notice of Requirement<sup>1</sup> ('the **NoR**'), the Transpower owned and operated high voltage Christchurch to Twizel 220kV ("**CHH-TWZ 220kV**") A line on towers traverses through the site subject to NoR D88. Refer Figure 1 below (source NoR Report).

The designation purpose is for a Recreation Reserve, with a proposed Master Plan included with the NoR. That portion of the proposed reserve in the vicinity of the transmission line is proposed to be

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<sup>1</sup> Notice of Requirement for a Recreation Reserve Designation, Proposed Recreation Reserve 27 Hampton Road, Prebbleton, dated May 2020, Prepared by Incite

used as a dog exercise area (including a fenced exercise area), car parking area and site access, and planting and landscaping. Refer Figure 2. Proposed Master Plan.



*Figure 1. National Grid CHH-TWZ 220kV line traversing the site*

As outlined in the NoR, there is a consent notice attached to the property which restricts works in proximity to the transmission line. The consent notice (reference CONO 7924824.4) regulates activities, buildings and structures, earthworks, vegetation, and machinery within proximity of the National Grid support structures and the conductors (wires). Transpower supports the conditions within the consent notice (noting the consent notice applies notwithstanding any designation). If the consent notice were to be removed at any stage, Transpower would seek conditions on the designation reflecting those in the consent notice.

On the basis the consent notice continues apply to the site, Transpower has no specific view or position in relation to the NoR. Similarly, should the Proposed Master Plan be altered, Transpower has no specific concerns on the basis the consent notice conditions continue to apply. However, notwithstanding the above, to highlight the presence of the consent notice and its conditions, Transpower supports the provision of an advice note on the designation, referencing the consent notice. This would highlight the need to comply with the consent notice conditions, particularly in relation to the reserve design and layout and landscaping, including during the Outline Plan process.





Figure 2. Proposed Master Plan and existing transmission line (shown as —)

## Transpower's submission and relief sought on NoR D88

1. The relief and reasons for the submission by Transpower are set out in Schedule 1.
2. Transpower **wishes to be heard** in support of this submission and would not consider presenting a joint case at the hearing.
3. Transpower could not gain an advantage in trade competition through this submission.

Please contact me on (09) 590 7540 or [environment.policy@transpower.co.nz](mailto:environment.policy@transpower.co.nz) if you have any queries or should you require clarification of any matter.

Dated at Wellington, this 17 July 2020

Signature for and on behalf of

**Transpower New Zealand Limited**

A handwritten signature in dark ink, appearing to read 'P. Whitney', written over a faint horizontal line.

Pauline Whitney  
Senior Environmental Planner

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## Schedule 1

Clause / Section	Specific NoR D88 Reference	Relief Sought	Amendment Sought	Reason
Designation		Amendment	Insert an Advice Note on the designation as follows: <i>Consent notice (reference CONO 7924824.4) applies to the designation site and imposes conditions in relation to the National Grid transmission line.</i>	<p>Transpower NZ Ltd is the owner and operator of the National Grid. The need to operate, maintain, develop and upgrade the National Grid is identified as a matter of national significance under the National Policy Statement on Electricity Transmission 2008. Transpower also has an interest as an occupier of the site.</p> <p>On the basis the consent notice continues to apply to the site, Transpower is neutral on the NoR. Should the Proposed Master Plan be altered, Transpower has no specific concerns, again on the basis the consent notice conditions continue to apply.</p> <p>However, while Transpower has no specific concerns, it would support an advice note on the designation highlighting the consent notice requirements. Such an advice note would have the benefit of readily informing the masterplan and outline plan process in the development of the reserve and ensure the consent notice conditions are not overlooked.</p> <p>Should the consent notice be removed at any stage, Transpower would seek conditions on the designation reflecting those in the consent notice.</p>