

Submission by Transpower NZ Limited on the
Upper Hutt City Council – Proposed Plan Change 42
Mangaroa and Pinehaven Flood Hazard Extents 2017

8 May 2017

Keeping the energy flowing



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FORM 5
SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED
ON PROPOSED PLAN CHANGE 42 MANGAROA AND PINEHAVEN FLOOD
HAZARD EXTENTS FOR THE UPPER HUTT CITY REGION
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE TO
THE RESOURCE MANAGEMENT ACT 1991

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Transpower could not gain advantage in trade competition through this submission

The specific provisions of the proposed plan change that the submission relates to are:

Refer attached submission which outlines the specific provisions, reasons and decisions/amendments sought.

Transpower NZ Ltd wish to be heard in support of its submission.



Signature of submitter
[or person authorised to sign on behalf of the submitter.]
Date: 8 May 2017

SUBMISSION BY TRANSPOWER NZ LTD ON UPPER HUTT CITY COUNCIL – PROPOSED PLAN CHANGE 42

INTRODUCTION

Transpower New Zealand Ltd (“**Transpower**”) is the state-owned enterprise that owns and operates the National Grid – the transmission network – that carries electricity around the country. It connects power stations owned by generating companies to substations feeding the local networks that distribute electricity to homes and businesses, with some intensive electricity users directly connecting to the National Grid. The National Grid comprises towers, poles, lines, cables and substations, and stretches and connects the length and breadth of the country; with two national control centres (in Hamilton and Wellington). The National Grid is supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that comprise the National Grid.

Transpower’s role and function is determined by the State Owned Enterprises Act 1986, the company’s Statement of Corporate Intent, and the regulatory framework within which it operates. As a State Owned Enterprise, Transpower has a very limited statutory role in relation to generation, and no responsibility for the local distribution of electricity.

Transpower’s Statement of Corporate Intent for July 2015 to July 2018, states that:

Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- *As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users; and*
- *As system operator, to operate a competitive electricity market and deliver a secure power system.*

One of Transpower’s key objectives therefore is to maintain and develop the National Grid. In line with this objective, Transpower needs to develop the network to meet increasing demand, and to connect new electricity generation, to contribute to New Zealand’s economic and social aspirations.

WELLINGTON REGION ASSETS

The National Grid comprises some 11,000 km of transmission lines and over 160 substations, extending from Kaikohe in the North Island down to Tiwai in the South Island. The 220 kV lines connect the largest power stations with the main load centres. Provincial centres and smaller power stations are connected by transmission lines operating at 220 kV, 110 kV, 66 kV and 50 kV. The National Grid is supported by a telecommunications network of some 300 telecommunication sites, which help link together the

components that make up the National Grid.

The following National Grid assets are within or traverse the Upper Hutt district boundaries:

- Bunnythorpe – Haywards A (BPE-HAY A) 220kV single circuit line on towers;
- Bunnythorpe – Haywards B (BPE-HAY B) 220kV single circuit line on towers;
- Haywards – Upper Hutt A (HAY-UHT A) 110kV double circuit line on towers;
- Masterton – Upper Hutt A (MST-UHT A) 110kV double circuit line on towers;
- Bunnythorpe – Wilton A (BPW-WIL A) 220kV double circuit line on towers;
- Gracefield – Haywards A (GFD HAY A) 110kV single circuit line on towers;
- Mount Climie (MCL) communications site;
- Upper Hutt Substation (UHT) (Akatarawa Road);
- Haywards – Upper Hutt (HAY_UHT_Trunk) underground fibre optic cables; and
- Masterton – Upper Hutt (MST_UHT_Trunk) underground fibre optic cables.

Refer to Appendix A for a map showing the location of these lines and substation.

Collectively, these assets assist Transpower in servicing the Wellington region, as well as the rest of New Zealand. The ongoing operation, maintenance, upgrading and development of these assets is essential to achieving wider social, economic, cultural and environmental benefits for the region. Transpower's electricity infrastructure is a significant physical resource for the purposes of section 7 of the Resource Management Act 1991 (RMA), and must be sustainably managed, and any adverse effects on that infrastructure should be avoided, remedied or mitigated.

STATUTORY FRAMEWORK

The National Policy Statement for Electricity Transmission 2008 (“**NPSET**”) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid, and establishes national policy direction to recognise the benefits of transmission, the effects of the National Grid and the need to appropriately manage activities and development close to it. The 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.*

The NPSET policies provide for the recognition of the benefits of transmission, as well as the environmental effects of transmission, and the management of adverse effects on the transmission network.

Sections 55 and 75 of the Resource Management Act 1991 (RMA) require Upper Hutt City Council (the Council) to “give effect” to the objective and policies of the NPSET in its District Plan. This is a strong direction and requires the provisions of the District Plan to reflect the direction and intent of the NPSET.

Policy 1 of the NPSET provides that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy, development and use of new electricity generation, and enhanced supply.

Policies 2 to 9 provide for managing the environmental effects of transmission. Policies 3 to 5 contain matters which decision-makers must take into account when considering the transmission network, including any constraints, the route site and method selection process, and operational requirements. Policy 6 seeks to reduce the existing adverse effects of transmission infrastructure through substantial upgrades where appropriate. Policies 7 and 8 relate to urban and rural environments, and identify areas that Transpower should seek to avoid in route selection. Policy 9 requires any provisions dealing with

electrical and magnetic fields to be based on international standards.

Policies 10 and 11 of the NPSET provide the primary guidance to the management of adverse effects of other activities on the transmission network. These policies are critical matters for a District Plan to address.

In brief, these policies seek to avoid sensitive activities in close proximity to electricity transmission lines and infrastructure (including substations), manage other activities to avoid reverse sensitivity effects on this network and to manage activities to ensure the operation, maintenance, upgrading and development of the network is not compromised.

Section 75(3)(a) of the RMA requires that District Plans must 'give effect' to a NPS. Therefore, the NPS must be considered in drafting plan provisions that relate to the management of the National Grid within a district, and in making decisions on submissions on those provisions (it must also be given effect by the Council when deciding whether to grant a resource consent on any proposal affecting the National Grid).

The Resource Management Regulations (Forms, Fees and Procedures) were amended in 2007 to require Transpower to be served notice of applications or reviews that may affect the National Grid (Clause 10(2)(i)). This amendment further acknowledges the importance of Transpower's National Grid assets in managing subdivision, development and land use in the District.

Also of relevance to Transpower's activities is the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA") which came into effect on 14 January 2010. However, the NESETA is not of relevance to PPC42 as the NESETA only applies to existing transmission lines existing at 14 January 2010, and there are no existing assets in areas subject to PPC42. The NESETA does not apply to the construction of new transmission lines, nor to existing or new substations.

Regional Policy Framework

The Regional Policy Statement for Greater Wellington was made operative in 2013. Section 75(3)(c) of the Resource Management Act requires that a proposed plan change must give effect to any Regional Policy Statement. The RPS contains the following relevant provisions:

POLICY 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans

District and regional plans shall include policies and/or methods that recognise:

(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure including:

...

(iii) people have access to energy so as to meet their needs; and

POLICY 8: Protecting regionally significant infrastructure – regional and district plans

District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure.

POLICY 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration

When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:

(a) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure; and

(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and ...

In Summary

Given the above statutory and policy framework, it is important, given its national and regional significance, that the management of the National Grid is properly addressed in the Upper Hutt City Council District Plan.

In making this submission, Transpower recognises and understands the importance of working with landowners and Councils in developing appropriate plan provisions. On this basis Transpower welcomes the opportunity to making a submission on Proposed Plan Change 42 ("PPC42"), and is willing to further discuss these submission points with Council staff.

In general, Transpower is largely in support of PPC42, principally on the basis Transpower has no existing assets in the identified flood extent area. The focus, therefore, for Transpower is in ensuring the PPC recognises and provides for any new National Grid infrastructure that is required to be located in the flood areas. As recognised in Policy 3 of the NPSET, the National Grid is subject to technical and operational requirements and these include locational constraints. Policy 3 is as follows:

When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.

An additional focus of the submission is in ensuring new network utility structures associated with the National Grid retain an activity status no more onerous than discretionary.

The following submission points relate to specific elements of the PPC42 that are supported by Transpower, or others where amendments to specific provisions are sought. Where appropriate, new or amended wording is suggested to assist Council officers. Wording suggested in this submission is shown as double underlined text and ~~strikethrough~~ text.

General Submission Point

GENERAL PLAN SUBMISSION POINT

1. Submission Point

Plan Change Overall

Support in part

Transpower seeks that the proposed plan change contains appropriate provisions to ensure that it provides adequate consideration and recognition of regionally significant infrastructure, particularly the National Grid.

Relief Sought:

- (i) That provisions in the proposed plan change ensure that:
 - Full effect is given to the National Policy Statement on Electricity Transmission 2008 (NPSET);
 - The sustainable management of the National Grid as a physical resource of national significance is recognised;
 - The benefits of the National Grid at local, regional and national levels are recognised;
 - The need for the ongoing operation, maintenance, development and upgrading of the network is recognised;
 - Appropriate provision for the planning and development of new National Grid infrastructure; and
 - The protection of the National Grid from issues of reverse sensitivity and the adverse effects of others' activities is recognised.
- (ii) Adopt any other such relief, including additions, deletions or consequential amendments necessary to give effect to this submission.

Specific Submission Points

CHAPTER 14 - NATURAL HAZARDS

2. Submission Point

14.3.2 Objective

Identify Flood Hazard Extents and Erosion Hazard Areas in order to avoid or mitigate the risk to people and property and provide for the function of the floodplain.

The extent of the threat from flood hazards and erosion hazards must be identified within the Pinehaven Stream and Mangaroa River catchments. The types of hazards within an identified Flood Hazard Extent can vary, with high hazard areas and lower hazard areas that need to be considered when planning for future development.

High hazard areas within the Flood Hazard Extent comprise the stream and river corridor, overflow paths and the Erosion Hazard Area. These are characterised by areas of moving flood water which may also be deep or fast and includes areas most at risk to erosion during a flood event. These are identified on the Hazard Maps. Subdivision and development within high hazard areas should be avoided given the threat these areas represent to people and property.

Outside the high hazard areas, but still within the Flood Hazard Extent, are lower hazard areas generally comprising the ponding areas and some parts of the erosion hazard area. These areas are generally characterised by still or slow moving flood water and a lower risk of erosion. These areas are identified on the Hazard Maps. Subdivision or development may be possible in these areas subject to appropriate mitigation (such as raising the floor levels above the 1 in 100-year flood level).

All development should be undertaken in a manner that provides for the function of the floodplain to discharge flood waters and thereby ensure that the effects from flooding are not exacerbated on the site, adjacent properties or the wider environment.

Support in part

While Transpower supports the overall intent of this Policy, it is very directive in its nature in that all development is to be avoided in high hazard areas. The directive nature does not recognise that there are some activities that for location, functional or operational reasons are required to locate within high hazard areas.

While Transpower would try to avoid high hazard areas for electricity infrastructure, this may not always be practicable given the technical and operational constraints associated with transmission lines, particularly where a new line connects with an existing line. The insertion of “inappropriate” would recognise that there are some activities that have technical, operational and location constraints associated with them, such as, the National Grid. Such constraints are recognised under Policy 3 of the NPSET.

Relief Sought:

- (i) Amend the paragraph 2 of the explanation to Objective as follows:

High hazard areas within the Flood Hazard Extent comprise the stream and river corridor, overflow paths and the Erosion Hazard Area. These are characterised by areas of moving flood water which may also be deep or fast and includes areas most at risk to erosion during a flood event. These are identified on the Hazard Maps. Subdivision and inappropriate development within high hazard areas should be avoided given the threat these areas represent to people and property.

- (ii) Any consequential relief.

3. Submission Point

14.4.3 Policy

Avoid development within high hazard areas of identified Flood Hazard Extents and Erosion Hazard Areas.

The high hazard areas present a threat to people and property as they can contain both fast and deep flowing water in a 1 in 100-year flood event, or are at risk of bank collapse which has the potential to damage buildings and threaten lives.

The policy provides directive for careful consideration of development within the high hazard areas, with a strong directive to avoid development in these high hazard areas.

Support in part

While Transpower supports the overall intent of this Policy, it is very directive in its nature in that all development is to be avoided in high hazard areas. The directive nature does not recognise that there are some activities that for location, functional or operational reasons are required to locate within high hazard areas.

While Transpower would try to avoid high hazard areas for electricity infrastructure, this may not always be practicable given the technical and operational constraints associated with transmission lines, particularly where a new line connects with an existing line. The insertion of “inappropriate” would recognise that there are some activities that have technical, operational and location constraints associated with them, such as the National Grid. Such constraints are recognised under Policy 3 of the NPSET.

Relief Sought:

- (i) Amend the Policy as follows:

Avoid inappropriate development within high hazard areas of identified Flood Hazard Extents and Erosion Hazard Areas.

The high hazard areas present a threat to people and property as they can contain both fast and deep flowing water in a 1 in 100-year flood event, or are at risk of bank collapse which has the potential to damage buildings and threaten lives.

The policy provides directive for careful consideration of development within the high hazard areas, with a strong directive to avoid inappropriate development in these high hazard areas.

- (ii) Any consequential relief.

4. Submission Point

14.4.4 Policy

To control development (including buildings) within the lower hazard areas of identified Flood Hazard Extents and erosion Hazard Areas by requiring mitigation to minimise the risk to people and property.

The policy recognises that there are lower hazard areas within the identified Flood Hazard Extent and some parts of the Erosion Hazard Areas. The lower hazard areas are characterised by still or slowly moving water and a lower risk of erosion. As such, development within these lower hazard areas can be appropriate provided measures are incorporated to mitigate the risk.

Support

Transpower supports the recognition of the need to control development within lower hazard areas to minimise risk to people and property, and the recognition that some development is appropriate.

Relief Sought:

- (i) Retain Policy 14.4.4
(ii) Any consequential relief.

CHAPTER 16 - NETWORK UTILITIES

5. Submission Point

16.2.1 Resource Management Issues

Balancing the national, regional and local benefits of network utilities with effects on the local Environment.

...

Network utilities and their on-going functioning can be affected by flood hazards. It is also possible for network utilities to increase the impact of flood hazards, particularly where linear infrastructure crosses stream or river corridors. The effect of flood hazards on new network utilities, and the impact on the flood hazard needs to be avoided or mitigated.

Support in part

Transpower supports the intent of the provision of this issue, in that it highlights the possibility for flood hazards to impact network utilities, and that network utilities can increase the impacts of flood hazards. However, the wording in the last sentence of the fourth paragraph could be more clear on this intent. Suggested punctuation and wording is provided below as double underline text.

Relief Sought:

- (i) Amend the fourth explanation paragraph as follows:

Network utilities and their on-going functioning can be affected by flood hazards. It is also possible for network utilities to increase the impact of flood hazards, particularly where linear infrastructure crosses stream or river corridors. The effect of flood hazards on new network utilities, and the impact of new network utilities, on the flood hazards needs to be avoided or mitigated.

- (ii) Any consequential relief.

6. Submission Point

16.3.4 Objective**Amended existing Objective**

The existing objective and supporting explanation is supported as it recognises new network utilities. While this objective does not form part of the plan change, amendment is sought to the explanation to recognise flood hazards as a consideration as the PPC42 does not recognise new network utilities (Objective 16.3.5 relates to existing).

If an amendment is not accepted in relation to Objective 16.3.4, and amendment is sought to Objective 16.3.5 (refer below). However, it is considered the existing wording of Objective 16.3.4 best suits the wording sought.

Relief Sought:

- (i) Amend Objective 16.3.4 as follows:

To manage any adverse effects on the environment resulting from the design, location, construction, operation, upgrading and maintenance of network utilities.

This Objective recognises that the construction, operation, upgrade and maintenance of network utilities can adversely affect the environment and amenity, and seeks to manage potential adverse effects, particularly through design and location. This recognises that some network utilities are relatively large, visually prominent and capable of generating significant effects on the environment. They may also have adverse effects on public health and safety, as well as flood hazard considerations. Adverse effects may only occur at the time of construction or installation of the utility, but in some instances may continue throughout its operation or during maintenance and / or upgrade works. For new lineal infrastructure, adverse effects are often best able to be mitigated through the route selection process. However, in some cases, it might not be entirely possible to avoid, remedy or mitigate all adverse effects associated with a network utility, meaning there may be some level of residual adverse effect on the surrounding environment. In such circumstances, there is a need to consider both the benefits the network utility will provide and the significance of the adverse effects on the surrounding environment.

OR

- (ii) Amend Objective 16.3.5 as follows:

To ensure the continued operation of network utilities, and the development and operation of new network utilities, in flood hazard extents and to maintain the function of the floodplain to convey flood waters.

- (iii) Any consequential relief.

7. Submission Point

16.3.5 Objective

To ensure the continued operation of existing network utilities in flood hazard extents and to maintain the function of the floodplain to convey flood waters.

Support

While Transpower has no existing assets within the identified flood hazard extents, the policy is supported as it recognises the critical role of network utilities.

- (i) Retain Objective 16.3.5
- (ii) Any consequential relief.

8. Submission Point

16.4.18 Policy

Network utility structures crossing streams within identified Flood Hazard Extents must be installed in a way to avoid contributing to blockages or restricting flood flows or compromising flood mitigation works.

Support

The Policy is supported as it recognises the need to appropriately design network utilities to ensure flood effects are not exacerbated.

- (i) Retain Policy 16.4.8
- (ii) Any consequential relief.

9. Submission Point

16.4.19 Policy

To control the location of network utilities in identified Flood Hazard Extents to ensure their operation is not compromised during a flood event.

Support

The Policy is supported as it recognises the need to appropriately design and locate network utilities to ensure flood effects are not exacerbated.

- (i) Retain Policy 16.4.19
- (ii) Any consequential relief.

CHAPTER 23 - RULES FOR EARTHWORKS

10. Submission Point

Table 23.1 Earthworks within Pinehaven Flood Hazard Extent

Non-complying Activity: Earthworks within the Pinehaven Flood Hazard extent (excluding those associated with flood protection works), which are within the overflow path or stream corridor.

Oppose

Under Table 30.1, new (above and underground) lines (including support structures) and substations are a discretionary or restricted discretionary activity. This activity status is not changed under PPC42. Transpower seeks confirmation that this rule does not apply to earthworks in relation to new network utility structures (on the basis of 30.1A).

Transpower opposes a non-complying activity status for earthworks within the overflow path or stream corridor of the Pinehaven Flood Hazard Extent if it were to apply to network utility structures. Given the linear nature of a new transmission line, applying the bundling approach, if part of a new transmission line triggered the non-complying earthworks rule, the application for the entire transmission line would be assessed as a non-complying activity.

If the rule does apply, a discretionary or restricted discretionary activity status is sought, reflective of the activity status for new substations and lines in Chapter 30.

Relief Sought

- (i) Confirmation that the non-complying rule in Table 23.1 Earthworks within Pinehaven Flood Hazard Extent does not apply to earthworks associated with network utility structures.
- (ii) If the above rule does apply to network utilities, that the activity status be amended from non-complying to discretionary/restricted discretionary.
- (iii) Any consequential relief.

11. Submission Point

Table 23.1 Earthworks within Mangarua Flood Hazard Area

Non-complying activity: Earthworks within the River Corridor of the Mangarua Flood Hazard Extent.

Support in part

Under Table 30.1, new (above and underground) lines (including support structures) and substations are a discretionary or restricted discretionary activity. This activity status is not changed under PPC42. Transpower seeks confirmation that this rule does not apply to earthworks in relation to new network utility structures (on the basis of 30.1A).

Transpower opposes a non-complying activity status for earthworks within the river corridor of the Mangarua Flood Hazard Extent if it were to apply to network utility structures. Given the linear nature of a new transmission line, applying the bundling approach, if part of a new transmission line triggered the non-complying earthworks rule, the application for the entire transmission line could be assessed as a non-complying activity.

If the rule does apply, a discretionary or restricted discretionary activity status is sought, reflective of the activity status for new substations and lines in Chapter 30.

Relief Sought:

- (i) Confirmation that the above non-complying rule in Table 23.1 Earthworks within Mangarua Flood Hazard Area does not apply to earthworks associated with network utility structures.
- (ii) If the above rule does apply to network utilities, that the activity status be amended from non-complying to discretionary/restricted discretionary.
- (iii) Any consequential relief.

CHAPTER 30 - RULES FOR NETWORK UTILITIES

12. Submission Point

Table 30.8a Permitted Activity Standard

Network utility structures (excluding cabinets) crossing a stream or river within an identified flood hazard area must be underground or positioned above the 1 in 100-year flood level.

Neutral

On the basis that standard 30.8a is unlikely to apply to any new Transpower assets given the existing rules within Section 30, Transpower is neutral on this standard. However, Transpower would oppose the imposition of the standard on any discretionary or restricted discretionary activities or expectation for undergrounding.

13. Submission Point

Table 30.13 Restricted Discretionary Activities

Cabinets and other network utility structures not otherwise listed in this table that do not meet all of the relevant standards.

Council will restrict its discretion to, and may impose conditions on:

...

- Except in the case of cabinets, where located within an identified Flood Hazard Extent:
 - Whether the utility or network utility structure will be adversely impacted during a flood event;
 - Where proposed to cross a river or stream, whether the Network Utility Structure will adversely impact contribute to blockages or obstructing flood flows;
 - Whether the utility will adversely impact the flood hazard area, exacerbating the effect on people and property on adjacent sites and/or adversely affect the function of the flood hazard extent

Support in part

Transpower supports the matters of discretion outlined under 30.13, although inclusion of the benefits of locating local, regional or national network utilities in certain locations is sought. Such recognition would reflect Policy 1 of the NPSET.

Relief Sought:

- (i) Insert paragraph as follows:
Whether locating the Network Utility Structure within the Flood Hazard Extent will provide any local, regional or national benefit.
- (ii) Any consequential relief.

CHAPTER 33 - RULES FOR FLOODING AND FAULT BAND HAZARDS

14. Submission Point

Table 33.1 Pinehaven Flood Hazard Extent and Pinehaven Catchment Overlay

Any building, structure or fence within the stream corridor of the Pinehaven Flood Hazard Extent (except where provided for under the rule for driveways and bridges as a controlled activity).

Support in part

Under Table 30.1, new (above and underground) lines (including support structures) and substations are a discretionary or restricted discretionary activity. This activity status is not changed under PPC42. Transpower seeks confirmation that this rule does not apply to new network utility structures (on the basis of 30.1A). The rule is unclear as it refers to “structures” which would in theory include a network utility structure.

If the rule was to apply to network utility structures, Transpower opposes a Non-Complying Activity status for new network utility structures within the Pinehaven Flood Hazard Extent. Given the linear nature of a new transmission line, applying the bundling approach, if part of a new transmission line triggered the non-complying earthworks rule, the application for the entire transmission line could be assessed as a non-complying activity.

If the rule does apply, a discretionary or restricted discretionary activity status is sought, reflective of the activity status for new substations and lines in Chapter 30.

Relief Sought:

- (i) Seeks confirmation that the above non-complying rule in Table 33.1 Pinehaven Flood Hazard Extent and Pinehaven Catchment Overlay does not apply to network utility structures.
- (ii) If the above rule does apply to network utilities, that the activity status be amended from non-complying to discretionary/restricted discretionary.
- (iii) Any consequential relief.

CHAPTER 35 - DEFINITIONS

15. Submission Point

Table 33.1 Pinehaven Flood Hazard Extent and Pinehaven Catchment Overlay

Support in part

Transpower notes that the Definitions Chapter included in the notified PPC42 does not refer to a Network Utility Structure. Transpower presumes that this definition is provided in Plan Change 38. Transpower seeks clarification on this matter.

Relief Sought:

- (i) Clarification that the Network Utility Structure definition not included in the Definitions Chapter of the PPC42 is that provided in Plan Change 38.
- (ii) Any consequential relief.

CONCLUSION

The National Grid is recognised as a nationally significant physical resource. Having reviewed the proposed Upper Hutt Plan Change 42, Transpower has set out in this submission a number of amendments to ensure that the NPSET is given effect to, appropriate recognition is given to the provisions of the NESETA and, as a result of this, appropriate provision is made in the Plan Change for the ongoing operation, maintenance, upgrading and development of the network, as well as ensuring new network utility structures associated with the National Grid are provided for.

Transpower would welcome the opportunity to meet with Council to discuss the above submission points.

DATED 8 May 2017

Signature for and on behalf of
Transpower New Zealand Limited:



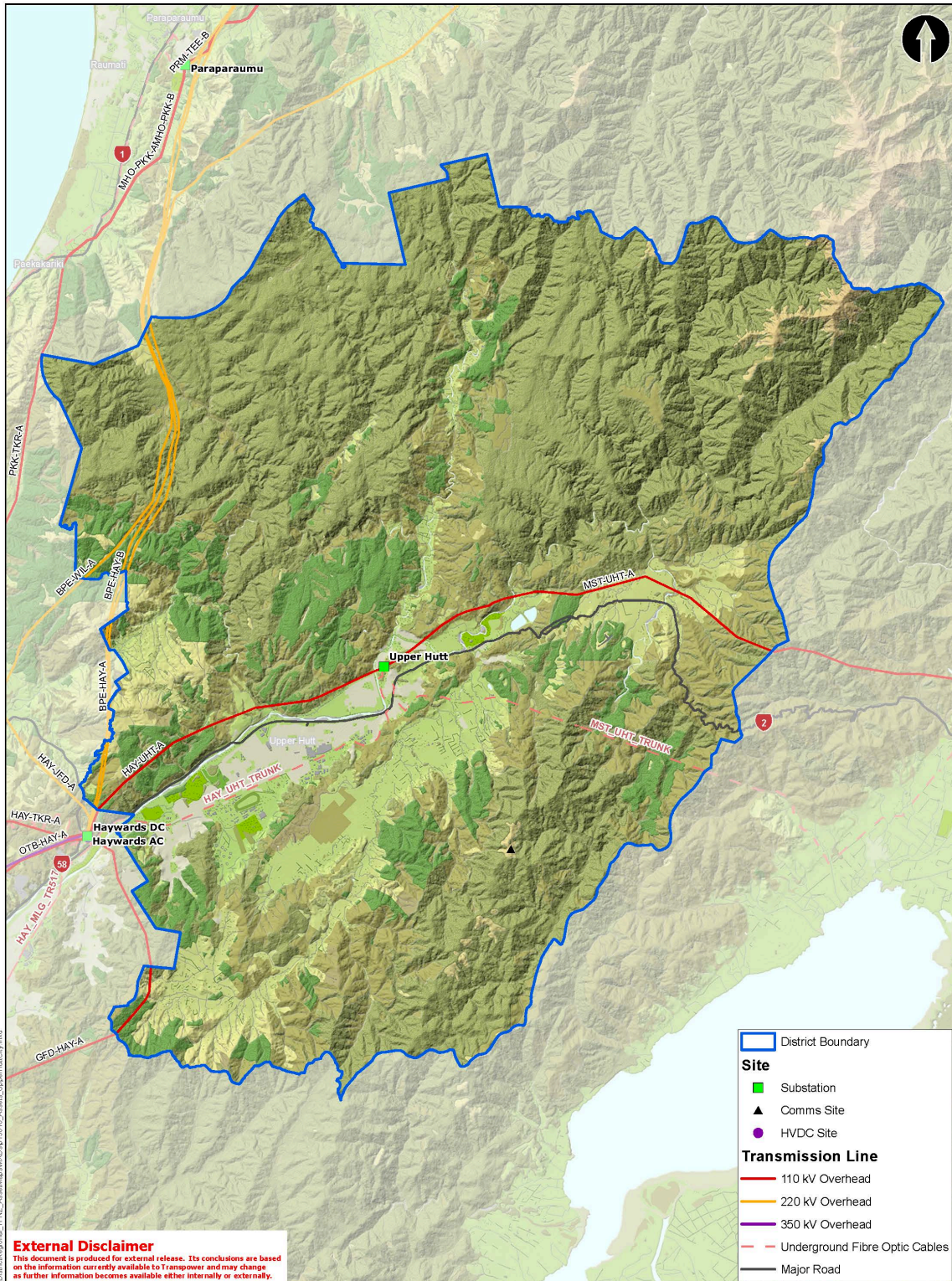
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Attachment A: Upper Hutt District National Grid Transmission Assets



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.

TRANSPOWER
 Prepared by: Geospacial & Drawings
 Projection: NZTM 2000 Scale: 1:110,000 Plan Size: A3P

Transpower Assets, Upper Hutt District

0 1.5 3 Km

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