### Submission of Transpower New Zealand Limited on Proposed Plan Change 50 to the Upper Hutt City District Plan

**17 November 2023** 

#### Keeping the energy flowing



#### **Transpower New Zealand Limited**

**Contact Details** 

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### **Submission form (FORM 5)**

OFFICE USE ONLY Submission number

# PROPOSED PLAN CHANGE TO THE UPPER HUTT CITY COUNCIL DISTRICT PLAN Proposed Plan Change 50 — Rural Review

The closing date for submissions is Friday, 17 November 2023, at 5pm

#### **To Upper Hutt City Council**

Submission on Proposed Plan Change 50 to the Upper Hutt City Council District Plan

**Deliver to:** Upper Hutt Civic Centre, 838 – 842 Fergusson Drive, Upper Hutt 5019

Post to: Planning Policy Team, Upper Hutt City Council, Private Bag 907, Upper Hutt 5140

Scan and email to: planning@uhcc.govt.nz

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

#### **Details of submitter**

When a person or group makes a submission or further submission on a Proposed Plan Change this is public information. By making a submission your personal details, including your name and addresses, will be made publicly available under the Resource Management Act 1991. This is because, under the Act, all submissions must be published to allow for further submission on the original submission. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential, please contact the Planning Team via email at planning Public and the published to allow for further and the published to allow for further submission or your submission or your contact details should be kept confidential, please contact the Planning Team via email

t planning@uhcc.govt.nz.
IAME OF SUBMITTER: Transpower New Zealand Limited
ONTACT PERSON: Rebecca Eng, Technical Lead – Policy
OSTAL ADDRESS OF SUBMITTER: PO Box 17215, Greenlane, Auckland
GENT ACTING FOR SUBMITTER (IF APPLICABLE)
DDRESS FOR SERVICE (IF DIFFERENT FROM ABOVE)
ONTACT TELEPHONE: (09) 590 7072 CONTACT EMAIL: Environment.Policy@transpower.co.nz
could gain an advantage in trade competition through this submission (please tick one ♥): <del>yes</del> / ✓ no
Only answer this question if you ticked 'yes' above:
I am ()/() am not (tick one <b>⊘</b> ) directly affected by an effect of the subject matter of the submission that:

## **Details of submission** The specific provisions of the proposed Plan Change that my submission relates to are as follows: Refer attached submission and appendices USE ADDITIONAL PAPER IF NECESSARY My submission is that: Refer attached submission and appendices PLEASE STATE IN SUMMARY THE NATURE OF YOUR SUBMISSION. CLEARLY INDICATE WHETHER YOU SUPPORT OR OPPOSE THE SPECIFIC PROVISIONS OR WISH TO HAVE AMENDMENTS MADE, GIVING REASONS. PLEASE USE ADDITIONAL PAPER IF NECESSARY I seek the following decision from the local authority: Refer attached submission and appendices PLEASE GIVE PRECISE DETAILS AND USE ADDITIONAL PAPER IF NECESSARY ✓ I do wish to be heard in support of my submission. Please indicate whether you wish to be heard in support of your I **do not** wish to be heard in support of my submission. submission (tick appropriate box **⊘**): ) I **do** wish to make a joint case. Please indicate whether you wish to make a joint case at the hearing if others make a ✓ I do not wish to make a joint case. similar submission (tick appropriate box ?): Signature and date Signature of person making submission or person authorised to sign on behalf of person making submission:

SIGNATURE DATE 17 November 2023

# Submission of Transpower New Zealand Limited on Plan Change 50 to the Upper Hutt City District Plan

#### **Introduction to Transpower**

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand's National Grid, the high voltage electricity transmission network for the country. The National Grid links electricity generators directly to major industrial users and distribution companies, feeding electricity to the local networks that distribute electricity to homes and businesses. The role of Transpower is shown in Figure 1 below.

The National Grid comprises towers, poles, lines, cables substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of around 300 telecommunication sites, which help link together the components that make up the National Grid.

It is important to note that Transpower's role is distinct from electricity generation, distribution, or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

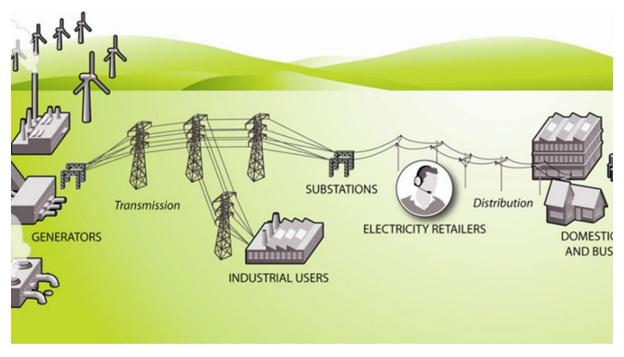


Figure 1: Role of Transpower in New Zealand's electricity industry. (Source: MBIE)

Transpower's role as outlined in its Statement of Corporate Intent for July 2023, states that:

Transpower is central to the New Zealand electricity industry. We connect generators to distribution companies and large users over long distances, providing

open access and helping to balance supply and demand. The nature and scope of the activities we undertake are:

- as grid owner, we own, build, maintain, replace, and enhance the physical infrastructure that connects those who generate and those who need electricity to live, work and play across the country; and
- as system operator, through a service provided under contract to the Electricity Authority under the Electricity Industry Participation Code, we operate the electricity market, managing supply and demand for electricity in real time to ensure that the power system remains stable and secure.

In line with the above, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's "Whakamana i Te Mauri Hiko" ('Empowering our Energy Future') predicts that electricity demand is likely to increase around 55% by 2050. Whakamana i Te Mauri Hiko suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which NZ's zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the existing National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded, and developed. 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, the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), and the Electricity (Hazards from Trees) Regulations 2003.

#### Statutory framework for the National Grid

The National Policy Statement on Electricity Transmission ('NPSET') was gazetted on 13 March 2008. The NPSET defines the National Grid as "the assets used or owned by Transpower NZ Limited". It confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act 1991 ('RMA') duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the National Grid. The NPSET only applies to the National Grid – the assets used, operated, or owned by Transpower – and not to electricity generation or distribution networks. A copy of the NPSET is attached as **Appendix 2**.

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:

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

The NPSET's Objective is implemented by fourteen policies. The policies must be applied by both Transpower and decision-makers under the RMA, as relevant. In a general sense these policies address the following:

- Policy 1: Recognising the benefits of the National Grid;
- Policy 2: Recognising and providing for the effective operation, maintenance, upgrading and development of the National Grid;
- Policies 3 to 5: Weighing the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising, and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;
- Policies 10 and 11: Managing adverse effects on the National Grid and providing for "buffer corridors";
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Section 75(3) of the RMA requires that a district plan "give effect to" a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

It is therefore a requirement that the Upper Hutt City District Plan ('District Plan'), and Plan Change 50 ('PC50') reflects national direction and that the District Plan is effective in helping support the integrated management of natural and physical resources across the region as a whole.

## Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ('NESETA') came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing on 14 January 2010. It does not apply to substations or electricity distribution lines, nor does it apply to the construction of new transmission lines (which are typically designated).

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan.

#### The National Grid in Upper Hutt City

The following table describes the components of the National Grid that are located within or pass through Upper Hutt City, as well as the specific PC50 zones that each component passes through:

National Grid asset	Relevant PC50 zones		
BPE-HAY-A: Bunnythorpe to Haywards 220kV overhead	<ul> <li>General Rural Zone (GRUZ)</li> </ul>		
transmission line on steel towers			
BPE-HAY-B: Bunnythorpe to Haywards 220kV overhead	<ul> <li>General Rural Zone (GRUZ)</li> </ul>		
transmission line on steel towers			

National Grid asset	Relevant PC50 zones
BPE-WIL-A: Bunnythorpe to Wilton 220kV overhead	Not within a PC50 zone
transmission line on steel towers	
HAY-UHT-A: Haywards to Upper Hutt 110kV overhead	<ul> <li>General Rural Zone (GRUZ)</li> </ul>
transmission line on steel towers	<ul> <li>General Residential Zone (GRZ)</li> </ul>
MST-UHT-A: Masterton to Upper Hutt 110kV overhead transmission line on steel towers	<ul> <li>General Rural Zone (GRUZ)</li> <li>General Residential Zone (GRZ)</li> <li>Rural Lifestyle Zone (RLZ)</li> <li>Rural Production Zone (RPROZ)</li> </ul>
GRF-HAY-A: Gracefield to Haywards 110kV overhead transmission line on steel towers	General Rural Zone (GRUZ)
Upper Hutt Substation	Not within a PC50 zone

Refer to **Appendix 3** for a map showing the location of the National Grid in relation to PC50 zones.

#### **Operative Upper Hutt City District Plan**

The operative Upper Hutt City District Plan (the 'District Plan') contains provisions across several chapters that relate to identifying, enabling and protecting the National Grid.

#### **Identifying the National Grid**

Under the operative District Plan, the National Grid is generally recognised under the definition of *transmission lines*. This includes a diagram that shows a series of different setbacks from national grid transmission lines and support structures for various different applications within the operative rules. The National Grid is also recognised under the definition of *regionally significant network utilities*.

The District Plan maps identify the National Grid under the symbol "high voltage lines" on the District Plan hazard maps.

#### **Enabling the National Grid**

Objectives, policies, and rules that provide for the operation, maintenance, upgrading, and development of the National Grid are located within the NU – Network Utilities section of the Energy, Infrastructure and Transport chapter. These provisions apply in all zones, including the zones that are the subject of PC50.

Objective NU-O2 is the principal objective that provides for "the sustainable, secure and efficient use and development" of the National Grid (which the objective refers to as "high voltage (110kV or greater) electricity transmission lines").

This objective is supported by the following policies:

- Policy NU-P2, which recognises the benefits of regionally significant network utilities;
- Policies NU-P5 and NU-P6, which seek to recognise and provide for and enable the efficient construction, installation, operation, upgrading and maintenance of network utilities.

Rules for the operation, maintenance and upgrading of National Grid lines existing on 14 January 2010 are managed under the NESETA, rather than the operative District Plan rules. However, the development of new or additional National Grid transmission lines and support structures is managed as a discretionary activity across all zones under rule NU-R29.

#### **Protecting the National Grid**

Objectives, policies, and rules that protect the National Grid (referred to as 'transmission lines') from being compromised by inappropriate subdivision, use and development are located across the District Plan. In general, objectives and policies that seek to protect the National Grid are located in the NU – Network Utilities and the SUB-GEN – General Subdivision Provisions sections of the District Plan, whereas the rules that regulate land use and development near the National Grid are located within each individual zone section of the District Plan.

Objective NU-O1 is the principal objective that seeks to protect the National Grid by ensuring that the functions and operations of regionally significant infrastructure are not compromised by other activities. Objective SUB-GEN-O6 seeks a similar outcome in relation to subdivision around regionally significant network utilities.

This objective is supported by the following policies:

- NU-P3, which requires new subdivision, use and development to avoid, remedy or mitigate
  potential adverse effects (including reverse sensitivity effects) on regionally significant
  network utilities;
- NU-P4 and SUB-GEN-P10, which require management of subdivision and development within close proximity to existing high voltage (110kV or greater) electricity lines, to protect both the electricity transmission network and the community.

With the exception of earthworks, rules for buildings, structures and subdivision near the National Grid are located in zone-specific sections of the District Plan. In general, the following rules apply to subdivision, use and development near the National Grid:

- Buildings and structures between 12 and 20 metres of a transmission line are a restricted discretionary activity (see for example rule GRZ-R16);
- Buildings and structures within 12 metres of a transmission line are a non-complying activity (see for example rule GRZ-R23);
- Earthworks within 12 metres of transmission lines are a permitted activity under rule EW-R1, subject to standard EW-S10. Earthworks that do not meet this standard are a restricted discretionary activity under rule EW-R9;
- Subdivision to create building platforms within 20 metres of a transmission line is a restricted-discretionary activity (see for example rule SUB-RES-R6).

#### Transpower's position on the operative District Plan

Transpower considers that the operative District Plan does not fully give effect to the NPSET. In particular, Transpower considers that:

- Objectives and policies do not sufficiently recognise the need to avoid reverse sensitivity effects on the National Grid (consistent with policy 10 of the NPSET).
- Objectives and policies do not give sufficiently clear direction to decision-makers so that
  resource consent applications for sensitive activities within buffer corridors around the
  National Grid will generally not be granted (consistent with policy 11 of the NPSET).
- The buffer corridors identified in the operative District Plan definition of transmission lines are not consistent with Transpower's engineering-based approach to identifying appropriate buffer corridors and managing activities within those corridors. In particular, the restriction on buildings and structures within 12-20m of a transmission line does not reflect Transpowers current engineering based approach and Transpower does not support restrictions for land beyond 12m. The 20 metre buffer corridor for subdivision in the operative District Plan is not

- consistent with the 32 or 37 metre buffer corridors that are appropriate to manage subdivision near 110kV and 220kV transmission lines.
- Provisions that manage subdivision, use and development are housed within separate zone sections of the District Plan, rather than being managed on a district-wide basis. This situation risks creating inconsistent management regimes for the subdivision, use, and development of land near the National Grid throughout the district.
- The National Grid is not clearly identified in the District Plan maps in accordance with the National Planning Standards.

As it relates to the rural zones that are the subject of PC50, some of these matters have been addressed through the notified version of PC50, and others are further addressed through this submission. Transpower acknowledges the efforts made by Council to give effect to the NPSET through the limited scope provided by PC50.

However, beyond PC50, Transpower's position is that the entire District Plan must be reviewed (including the Earthworks rules) in order for it to fully give effect to the NPSET, and to ensure that there is consistent management of subdivision, use and development near the National Grid throughout the district. Such a review is particularly applicable given the proposed residential rezoning of land and the application of the operative transmission line provisions to that rezoned land.

#### **Summary of Transpower's submission on PC50**

Transpower's detailed submission on PC50 is set out in **Appendix 1**. In summary, Transpower:

- generally supports the proposed definitions that relate to the National Grid, but seeks some amendments (including consequential amendments to the definition of transmission lines) to improve plan implementation and interpretation;
- generally supports the national grid subdivision corridor approach adopted by PC50 (including the associated definition, subdivision rules, and standards);
- generally supports the national grid yard approach adopted by PC50 (including the associated definition, land use rules, and standards), but seeks amendments to improve plan implementation and interpretation;
- seeks that rules and standards for use and development within the national grid yard are added to the Rural Production Zone, on the basis that the Masterton to Upper Hutt 110kV overhead transmission line traverses this zone;
- seeks amendments to policies that enable or restrict certain activities in each zone to recognise the need to not compromise the safe and efficient operation, maintenance, upgrading and development of the National Grid;
- seeks amendments to zone-specific infrastructure policies to recognise the safe and efficient maintenance, upgrading and development of transmission lines, in addition to their operation;
- generally opposes the rezoning of specified areas of land under or near the National Grid to General Residential Zone, at least until the management regime for subdivision, use and development of land near the National Grid within the General Residential Zone is amended to be consistent with the regime promoted for rural zones under PC50;
- seeks that objectives and policies that seek to protect highly productive land are amended to recognise the need to provide for specified infrastructure, as defined under the National Policy Statement for Highly Productive Land 2022 ('NPS-HPL');
- Seeks that the District Plan maps are amended to clearly identify the National Grid in a manner that gives effect to the National Planning Standards.

The relief sought by Transpower is set out under the "relief sought" column of the table in Appendix 1. Where Transpower seeks specific amendments to the text of PC50, the following text conventions have been used:

Text convention	Description	
Black text underlined	Text of PC50 as notified.	
Red text underlined	Text sought to be added by Transpower through its submission on PC50.	
Red text struck through	Text sought to be deleted by Transpower through its submission on PC50.	

For the avoidance of doubt, the relief sought in Appendix 1 includes any consequential amendments that may be required to give effect to the relief sought (even if these consequential amendments have not been specified in the submission).

### Appendix 1 – Submission table

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought			
3.1 De	.1 Definitions						
1.	National grid has the same meaning as given in the National Policy Statement on Electricity Transmission 2008 as set out below. It is identified as the "National Grid" on the planning maps. means the assets used or owned by Transpower NZ Limited	Support	Transpower supports the proposed definition of national grid because it is consistent with the NPSET.  Transpower supports the reference in the definition to the identification of the National Grid on the planning maps, however it is noted that the planning maps do not currently identify the National Grid. To address this, Transpower seeks a consequential amendment to the planning maps to identify the National Grid (see submission point 32).  Transpower also considers that a consequential amendment to the definition of transmission line so that it is clear that transmission lines include the National grid (see submission point 6).  Transpower preference is also that the term has capital letters, providing consistency across the provisions in that in some places capital are used, but not in all references.	Retain as notified but capitalise the term and its use in the plan change.  National &Grid			
2.	National grid subdivision corridor	Amend	The provision of a National Grid Subdivision Corridor definition is supported on the basis that it gives effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the National Grid Yard and National Grid Subdivision Corridor supported by Transpower for the National Grid.  Notwithstanding this, Transpower submits that minor amendments to the definition text are necessary to:  Recognise that only 110kV and 220kV transmission lines on towers traverse the district; and  Improve clarity of interpretation.	Amend as follows:  National gGrid sSubdivision cCorridor  means the area measured either side of the centreline of the above ground "National Ggrid" transmission line as follows:  1. 16m for the 110kV lines on pi poles.  21. 32m for the 110 kV transmission lines on towers.  32. 37m for the 220 kV transmission lines on towers.  The National Grid Subdivision Corridor does not apply to underground cables or any transmission line (or sections of lines) that are designated by Transpower. The measurement of setback distances from National Gridlines the National Grid			

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			The addition of a diagram is also sought to provide clear direction to District Plan users on how the National Grid Subdivision Corridor is to be measured.  The inclusion of a specific definition of National Grid Subdivision Corridor for the rural zones under PC50 requires consequential amendment to the operative District Plan definition of <i>transmission lines</i> (see submission point 6), to ensure that the diagram under that definition (which is outdated but still applies to the operative District Plan zones that are not part of PC50) does not apply to the National Grid provisions being introduced to the rural zones under PC50.  Transpower preference is also the term have capital letters.	shall be taken from the centreline of the transmission line-and the outer edge of any support structure as shown in the diagram below. The centreline at any point is a straight line between the centre points of the two support structures at each end of the span.    Authors Grid   12m   1
3.	<u>National grid γard</u>	Amend	The provision of a National Grid Yard definition is supported on the basis that it gives effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the National Grid Yard and subdivision corridor approach promoted by Transpower for the National Grid.  Notwithstanding this, Transpower submits that minor amendments to the definition text are necessary to improve clarity of interpretation.  The addition of a diagram is also sought to provide clear direction to District Plan users on how the National Grid Yard is to be measured.  The inclusion of a specific definition of National Grid Yard for the rural zones under PC50 requires consequential amendment to the operative District Plan definition of <i>transmission lines</i> (see submission point 6), to ensure that the diagram under that definition (which is outdated but still applies to the operative District Plan zones that are not part of PC50) does not apply to the National Grid provisions being introduced to the rural zones under PC50.	Amend as follows:  National gGrid yYard  means the area located within:  1. 12 metres in any direction from the outer visible edge of a "National Ggrid" support structure foundation; and  2. 12 metres either side of the centreline of any overhead "National Ggrid" transmission line.  The National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.  The measurement of setback distances from the "National Ggrid" lines shall be taken from the centreline of the transmission line and the outer edge of any support structure as shown in the diagram below. The centreline at any point is a straight line between the centre points of the two support structures at each end of the span.

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			Transpower preference is also the term have capital letters.	National Grid Subdivision Comport*  National Grid Yard*  12m 12m 12m 12m 12m 12m Pole  Steel Tower/ Pole  Steel Tower/ Pole
4.	Sensitive activities	Amend	Transpower supports including a definition of sensitive activities within the District Plan and recognises that the definition applies in relation to a range of activities in the rural environment (not just the National Grid).  However, as drafted, it is not clear that the definition applies to activities that are sensitive to the operation, maintenance, upgrading and development of the National Grid, particularly within the National Grid Yard and National Grid Subdivision Corridor. Transpower considers that amendment to the definition is necessary in order to ensure that its application to the National Grid is clear.  The amendment sought by Transpower is consistent with giving effect to policies 10 and 11 of the NPSET.	Amend as follows:  Sensitive activities  means activities which are more sensitive to noise, dust, spray, residue, odour or visual effects of nearby activities, or activities which are sensitive to the operation, maintenance, upgrading, and development of the National Grid, including  a. residential activities;  b. visitor accommodation;  c. educational facilities;  d. medical facilities
5.	Specified infrastructure  Note: this definition was not included in notified PC50.	Amend	There are several provisions in PC50 that seek to give effect to the NPS-HPL, and Transpower seeks that these provisions are amended to appropriately recognise the need to provide for specified infrastructure, as defined in the NPS-HPL.  As a consequential amendment to submission points 7 and 8, Transpower considers that it is necessary to include the NPS-HPL definition of <i>specified infrastructure</i> within the District Plan.	Add a new definition as follows:  Specified infrastructure  has the same meaning as set out in the National Policy Statement for Highly Productive Land 2022:  means any of the following:  (a) infrastructure that delivers a service operated by a lifeline utility:  (b) infrastructure that is recognised as regionally or nationally significant in a National Policy Statement, New Zealand Coastal Policy Statement, regional policy statement or regional plan:

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
6.	Transmission line	Amend	As noted in submission point 1, Transpower considers that	(c) any public flood control, flood protection, or drainage works carried out:  (i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941; or  (ii) for the purpose of drainage, by drainage districts under the Land Drainage Act 1908  Amend as follows:
			because the <i>national grid</i> is now a separately defined term, consequential amendment to the definition of <i>transmission line</i> is necessary to ensure that it is clear that District Plan provisions that apply to <i>transmission lines</i> also apply to the <i>national grid</i> but that the setbacks within the definition (of <i>transmission line</i> ) do not apply to the areas subject to PC50.  As noted in submission points 2 and 3, the diagram under the current definition is outdated and is not consistent with the definition of <i>national grid subdivision corridor</i> or <i>national grid yard</i> .  However, Transpower recognises that until the National Grid provisions in the District Plan are comprehensively reviewed, the setbacks within the diagram will continue to apply within operative District Plan zones that are outside the scope of PC50. To ensure that the diagram in this definition is not applied in a manner that is contrary to the new definitions of <i>national grid subdivision corridor</i> and <i>national grid yard</i> , consequential amendment to the definition of <i>transmission line</i> is necessary to ensure that the setbacks described within the diagram are not applied in the rural zones.	Transmission line  has the same meaning as in section 3 of the Resource  Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 and includes the  National Grid (as defined).  Tower support structure  Note: The measurement of setback distances from electricity transmission lines shall be taken from the centre line of the electricity transmission line and from the outer edge of any support structure. The centre line at any point is a straight line

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
SHR-RI	JR – Subdivision in Rural Zones			between the centre points of the two support structures at each end of the span. The diagram above depicts setback distances.  The diagram above does not apply to the application of this definition within the General Rural, Rural Lifestyle or Rural Production Zones (refer instead to the definitions of National Grid Subdivision Corridor and National Grid Yard).
7.	SUB-RUR-O1  Protection of rural productivity	Amend	Transpower considers that this objective does not give full effect to the NPS-HPL because it does not appropriately recognise the need to provide for <i>specified infrastructure</i> (as defined in the NPS-HPL).  Clauses 3.8 and 3.9 of the NPS-HPL provide consenting pathways for subdivision and land use consents for specified infrastructure on highly productive land. Transpower considers that amendment to objective SUB-RUR-O1 is necessary in order that that this objective does not frustrate the consenting pathways for specified infrastructure that are available under the NPS-HPL.	Amend as follows:  SUB-RUR-O1 Protection of rural productivity  The productive capacity of highly productive land is protected from fragmentation, except where this provides for specified infrastructure.
8.	SUB-RUR-P6 Productive capacity of highly productive land	Amend	Transpower considers that this policy does not give effect to the NPS-HPL because it does not appropriately recognise the need to provide for <i>specified infrastructure</i> (as defined in the NPS-HPL).  Clauses 3.8 and 3.9 of the NPS-HPL provide consenting pathways for subdivision and land use consents for specified infrastructure on highly productive land. Transpower considers that amendment to objective SUB-RUR-P6 is necessary in order that this policy does not frustrate the consenting pathways for specified infrastructure that are available under the NPS-HPL.	Amend as follows: <u>SUB-RUR-P6 Productive capacity of highly productive land</u> <u>Restrict the fragmentation of highly productive land in a way</u> <u>that diminishes the productive capacity of the land, except</u> <u>where this provides for specified infrastructure.</u>
9.	SUB-RUR-R7-R8  Restricted discretionary activity	Support	Transpower supports the proposed amendments to the rule on the basis that they give effect to policies 10 and 11 of the NPSET.  A restricted discretionary activity status for subdivision that demonstrates a building platform outside the National Grid	Retain as notified with minor amendments as follows:  - amend the reference to National Grid Subdivision Corridor to have capital letters  - retain 'the' within clause 2 as highlighted below

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
	General Rural Rural Production Settlement Rural Lifestyle Development Area 2  Subdivision of land within the National Grid Subdivision Corridor which creates building platforms within 32m of high voltage (110k or greater) electricity transmission lines as shown on comply with the Planning Maps *(refer to the definition of transmission line) standards in SUB-RUR-S6  In addition Matters over which discretion is restricted:  1. The extent to which the subdivision allows for the ongoing efficient operation, maintenance, upgrading and development of the National Grid, including the ability for continued reasonable access for inspections, maintenance and upgrading.  2. The location of any complying future building platform as it relates to the matters listed in SUB-RUR-R1, Council National Grid Yard will restrict its discretion to, and may impose conditions on: 3. The extent to which the subdivision design manages potential conflicts with existing		Yard, and where vehicle access to support structures is maintained, provides an appropriate incentive to design subdivision layouts that avoid building sites within the National Grid Yard. Subdivision is considered the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) on potential activities, are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). The provision of a restricted discretionary activity status would be consistent with that secured across multiple district plan reviews across New Zealand.	2. The location of any complying future building platform as it relates to the matters listed in SUB-RUR-R1, Council National Grid Yard will restrict its discretion to, and may impose conditions on:  - insert a 's' at the end of assets within clause 9 as shown in red below  9. The extent to which the subdivision design and consequential development will minimise the potential adverse reverse sensitivity on and amenity and nuisance effects of earthworks, dust generation and construction activities, including provision of appropriate separation distances, managing on the risks to structural integrity, and safety risks associated with the use of mobile machinery National Grid assets.

Sub.	Specific Plan Change Provisions	Support/	Submission	Relief sought
point		Oppose/		
#		Amend		
	lines by locating allows for			
	sensitive activities to be roads			
	and reserves under setback from			
	the route of the line.The extent			
	to which maintenance and			
	inspections of transmission lines			
	are affected including access.			
	The extent to which potential			
	adverse effects including risk or			
	injury, property damage and			
	visual impact are mitigated			
	through the location of building			
	platforms and landscaping			
	National Grid.			
	4. The outcome nature and			
	location of any consultation with			
	vegetation to be planted in the			
	affected utility operator.			
	Separation distances between			
	trees and conductors and the			
	location and mature size vicinity			
	of trees planted near the			
	transmission lines National Grid			
	and how such landscaping will			
	impact on the operation,			
	maintenance, upgrade and			
	development (including access)			
	of the National Grid.			
	5. Compliance The ability of			
	future development to comply			
	with the NZECP 34:2001 New			
	Zealand Electrical Code of			
	Practice for Electrical Safe			
	Distances 2001 (NZECP 34:2001).			
	•			

Sub.	Specific Plan Change Provisions	Support/	Submission	Relief sought
point		Oppose/		
#		Amend		
	6. Measures necessaryThe risk			
	of electrical hazards affecting			
	public or individual safety, and			
	the risk of property damage.			
	7. The outcome of any			
	consultation with the owner and			
	operator of the National Grid.			
	8. <u>The risk</u> to <del>avoid, remedy or</del>			
	mitigate the structural integrity			
	of the National Grid.			
	9. The extent to which the			
	subdivision design and			
	consequential development will			
	minimise the potential adverse			
	reverse sensitivity on and			
	amenity and nuisance effects-of			
	earthworks, dust generation and			
	construction activities, including			
	provision of appropriate			
	separation distances, managing			
	on the risks to structural			
	integrity, and safety risks			
	associated with the use of			
	mobile machinery National Grid			
	asset.			
	Restriction of notification Note:			
	Subject to sections 95A(2)(b),			
	95A(2)(c), 95A(4) and 95C of the			
	Act,If a resource consent			
	application is made under this			
	rule, <u>Transpower</u> will be			
	precluded from public			
	notification under section			
	95A,considered an affected			
	person in accordance with			

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
	Section 95E of the Act and limited notification will be served on Transpower New Zealand Limited as notified of the only affected party under section 95B application, where written approval is not provided.  (Restricted discretionary activity)			
10.	SUB-RUR-S6 All zones  Standards for subdivision within the national grid subdivision corridor  1. it is demonstrated that all resulting allotments, except allotments for access or public work, are capable of accommodating a building platform for the likely principal building(s) and any building(s) for sensitive activities wholly outside the national grid yard (other than where the allotments are for roads, accessways and network utilities); and  2. the layout of allotments and any enabling earthworks shall ensure that physical access is maintained to any national grid support structures located on the allotments, including any balance area.	Support	Transpower supports the proposed standards on the basis that they give effect to policies 10 and 11 of the NPSET.	Retain as notified (but amend the reference to National Grid Subdivision Corridor to have capital letters).

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
11.	SUB-RUR-R17 All zones  Subdivision within the National Grid Subdivision Corridor which does not comply with SUB-RUR-S6  Non-complying activity	Support	Transpower supports the proposed rule on the basis that it gives effect to policies 10 and 11 of the NPSET.  The default non-complying activity status is supported on the basis it is considered the most effective means of giving effect to the NPSET's objective of managing the adverse effects of the network and managing the adverse effects of other activities on the network. In particular, a non-complying activity status:  (a) Most appropriately recognises and provides for the effective operation, maintenance, upgrading and development of the network, as required by NPSET Policy 2;  (b) Is the best method to manage other activities to ensure the operation, maintenance, upgrading, and development of the network is not compromised, as required by Policy 10.  (c) Recognises the policy directive within Policy 11 to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for.	Retain as notified.
	- General Rural Zone			
12.	GRUZ-P1 Appropriate activities	Amend	Transpower considers that an additional clause is necessary to recognise that activities are only enabled in locations that do not compromise the safe and efficient operation, maintenance, and upgrading of the National Grid.  Transpower considers this is necessary to give effect to policy 10 of the NPSET, and to provide further policy direction for activities that breach standard GRUZ-S13.	Amend as follows:  GRUZ-P1 Appropriate activities  Enable activities that are compatible with the purpose of the General rural zone, while ensuring that their design, scale and is appropriate to the rural environment, including:  1. farming activities and rural industry and ancillary activities;  2. rural residential activities;  3. small scale commercial activities which support or are ancillary to farming activities and residential activities, including visitor accommodation, farm stay, rural produce retail and home businesses;  4. rural tourism which contributes to the vitality and resilience of the District's economy; or  5. passive recreation activities.

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
13.	GRUZ-P5 Infrastructure	Amend	Policy 2 of the NPSET requires that decision-makers "recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network". Transpower considers that policy GRUZ-P5 needs to be amended to refer to maintenance, upgrading and development, in addition to operation, so that the policy gives effect to policy 2 of the NPSET.  Transpower also considers that the amendment is necessary to ensure that the policy is consistent with policies NU-P5 and NU-P6, which seek to enable, amongst other matters, the efficient maintenance and upgrading of network utilities.	where they:  1. provide for varying forms, scale, and separation of buildings and structures, including additions and alterations  2. manage the density and location of residential development;  3. ensure adequate infrastructure is available to service the activity, including on-site servicing where reticulated services are not available;  4. will not compromise the efficiency of the transport network;  5. will not compromise the safe and efficient operation, maintenance, and upgrading, of the National Grid;  56. manage reverse sensitivity effects on sensitive activities; and 67. minimise adverse effects on the environment.  Amend as follows:  GRUZ-P5 Infrastructure  To ensure that transport networks, transmission lines and other regionally significant network utilities are able to be operated, maintained, upgraded, and developed safely and efficiently.
14.	GRUZ-P6 Intensive farming	Amend	Transpower considers that an additional clause is necessary to recognise that intensive farming is restricted to locations that do not compromise the safe and efficient operation, maintenance, and upgrading of the National Grid.  Transpower considers this is necessary to give effect to policy 10 of the NPSET, and to provide further policy direction for intensive farming that breaches standard GRUZ-S13.	Amend as follows:  GRUZ-P6 Intensive farming  Restrict intensive farming to where it can be demonstrated that:  1. the site design, layout and scale of the activity is compatible with the character and amenity values of the General rural zone;

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
15.	GRUZ-R5  Buildings  One family flat in conjunction and structures, including additions and alterations complying with:	Support	Transpower supports the rule on the basis that it incorporates standard GRUZ-S13 (Buildings or structures within the National Grid Yard) as a permitted activity standard.	2. there is adequate three waters and transport infrastructure available to service the activity;  3. the activity will not compromise the efficiency and safety of the transport network;  4. the activity will not compromise the safe and efficient operation, maintenance, and upgrading, of the National Grid;  45. areas of indigenous vegetation are retained; and  56. there are measures to internalise effects and avoid conflict and potential reverse sensitivity effects on sensitive activities.  Retain as notified.
	1. GRUZ-S1; 2. GRUZ-S2; 3. GRUZ-S3; 4. GRUZ-S4; 5. GRUZ-S5; 6. GRUZ-S13; 7. GRUZ-S14; a residential unit and 8. NOISE-S7 (Permitted activity)			
16.	GRUZ-S13	Amend	The proposed land use rules are specific to the National Grid Yard which is identified on the planning maps and further defined in the Definitions.	Amend as follows:

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
	Buildings or structures within the national grid yard		The inclusion of a specific suite of provisions is consistent with the approach adopted across New Zealand and gives effect to the NPSET. Transpower generally supports the proposed standard and considers that it appropriately gives effect to policies 10 and 11 of the NPSET.  Within Rural zones, Transpower is satisfied that there are some activities that are appropriate within the National Grid Yard due to their nature and small scale, and because they will not compromise the operation, maintenance or any upgrade of the network itself. Certain structures (such as rural hay barns, pump sheds and implement sheds) are less problematic within 12m of the line (noting that they will still need to be set back 12m from National Grid support structures) on the basis they are unlikely to "build out" a line. The notified provisions allow for paddocks, fencing (as high as deer fences), landscaping and small sheds, and larger farm buildings in proximity to conductors not used for intensive farming purposes. Grazing, cropping, and car parking activities are not restricted.  Conversely, examples of development that has severely restricted or blocked Transpower's ability to effectively access its assets include dairy sheds, piggeries, poultry sheds and commercial hothouses and glass houses, as well as sensitive activities. These activities can cover an extensive area of land, and it may be expensive to disrupt or require these activities to be relocated while Transpower carries out work on its transmission assets.  While the standard is generally supported, Transpower considers the following amendments to the standard are necessary to improve District Plan interpretation and administration:  • Transpower considers amendments are required to the chapeau so that it adopts appropriate syntax for a standard. In addition to this, Transpower considers that the reference to "sites where under-build within the National Grid Yard did not exist at October 2023"	GRUZ-S13 Buildings or structures within the National Grid yYard  On sites where under build within the national grid yard did not exist at October 2023 and where the proposed building or structure Buildings and structures must maintains the safe electrical distances required by NZECP34:2001 in all National Ggrid line operating conditions, and does must not permanently physically impede existing vehicular access to a National Ggrid support structure, provided that:  1. within the National Ggrid Yyard:  a. eny it is an alteration or addition to an existing building or structure for a sensitive activity that does not involve an increase in the building height or footprint, or an accessory building for a sensitive activity that is no more than 2.5m in height and no more than 10m² in area; or b. it is a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); or  c. it is a non-habitable building or structure for farming activities in rural zones (but not including any building for intensive farming, commercial greenhouses or milking/dairy sheds, although ancillary buildings associated with these uses are permitted); or d. it is a yard for milking/dairy sheds; or e. it is an artificial crop protection structure or crop support structure (excluding commercial greenhouses and PSA structures); or f. it is a fence less than 2.5m in height above ground level;

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			makes the application of the standard unclear. The National Grid Yard standard should apply to all buildings and structures, regardless of whether there are existing buildings on the site located within the National Grid Yard. The reference to existing activities is more for activities in urban areas where there are existing transmission activities.  It is appropriate to amend standard 1.a to provide for small accessory buildings within the National Grid Yard, where they comply with NZECP34:2001.  Several minor amendments to standard 1 are sought to improve interpretation of the standard and reflect the current yard approach.  Standard 3 should be deleted on the basis that it is not applicable within the district. All transmission lines that traverse the district are on tower support structures, and there are no transmission lines that are on pi-pole support structures.	2. around the Neational Gerid support structures, the building or structure is at least 12m from the outer visible edge of any Neational Gerid support structure foundation and associated stay wire, and does not physically impede existing vehicular access to a Neational Gerid support structure unless it is one of the following:  a. a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes);  b. a fence no greater than 2.5m high above ground level and no closer than 6m to the nearest Neational Gerid support structure; or  c. a building or structure where Transpower has given written approval in accordance with clause 2.4.1 of NZECP34:2001;  3. around national grid support structures, an artificial crop protection or crop support structure between 8m and 12m from a pi-pole support structure (but not a tower) and any associated guy wire (but not a tower), that:  a. is not more than 2.5m high above ground level; b. is removable or temporary, to allow a clear working space 12m from the pole when necessary for maintenance and emergency repair purposes; c. allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; and d. meets the requirements of the NZECP34:2001 for separation distances from the conductor.

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
17.	GRUZ-R30  Buildings or structures within the national grid yard that does not meet GRUZ-S13  (Non-complying activity)	Support	Transpower supports non-complying activity status for buildings or structures within the National Grid Yard that do not meet standard GRUZ-S13, on the basis that this gives effect to policies 10 and 11 of the NPSET.	Retain as notified (but amend the reference to National Grid Yard to have capital letters)
18.	GRUZ - Non-complying activity rule – Sensitive Activities	New rule	Transpower notes the GRUZ does not include a sensitive activities rule (as is provided for RLZ-R26). Transpower supports the provision of a non-complying activity status rule for sensitive activities within the National Grid Yard, on the basis that this gives effect to policies 10 and 11 of the NPSET. While the likelihood for sensitive activities is more limited given the zoning, there remains the potential and this is required to be managed.	Add a non-complying activity rule to the table of non-complying activities in the GRUZ, for sensitive activities within the National Grid Yard, to reflect that provided in Rule RLZ-R26.
RPROZ	- Rural Production Zone			
19.	RPROZ-P1 Appropriate activities	Amend	Transpower considers that an additional clause is necessary to recognise that activities are only enabled in locations that do not compromise the safe and efficient operation, maintenance, and upgrading of the National Grid.  Transpower considers this is necessary to give effect to policy 10 of the NPSET, and to provide further policy direction for activities that breach the National Grid Yard standard sought by Transpower under submission point 23.	Amend as follows:  RPROZ-P1 Appropriate activities  Enable activities that are maintain the productive capacity of highly productive land in the Rural production zone, while ensuring that their design, scale and intensity is appropriate to the rural environment, including:  1. farming activities and ancillary activities;  2. rural residential activities;  3. farm stay, rural produce retail and home businesses which support or are ancillary to farming activities and residential activities; or  4. passive recreation activities:  where they:  1. provide for varying forms, scale, and separation of buildings and structures, including additions and alterations

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
				2. manage the density and location of residential development;
				3. ensure adequate infrastructure is available to service the activity, including on-site servicing where reticulated services are not available;
				4. will not compromise the efficiency of the transport network;
				5. will not compromise the safe and efficient operation, maintenance, and upgrading, of the National Grid;
				56. manage reverse sensitivity effects on sensitive activities;
				67. minimise adverse effects on the environment; and
				78. do not compromise the productive capacity of highly productive land.
20.	RPROZ-P4	Amend	Policy 2 of the NPSET requires that decision-makers "recognise	Amend as follows:
	Infrastructure		and provide for the effective operation, maintenance, upgrading and development of the electricity transmission	RPROZ-P4 Infrastructure
			network". Transpower considers that the policy needs to be amended to refer to maintenance, upgrading and development, in addition to operation, so that the policy gives effect to policy 2 of the NPSET.	To ensure that transport networks, transmission lines and other regionally significant network utilities are able to be operated, maintained, upgraded, and developed safely and efficiently.
			Transpower also considers that the amendment is necessary to ensure that the policy is consistent with policies NU-P5 and NU-P6, which seek to enable, amongst other matters, the efficient maintenance and upgrading of network utilities.	
21.	RPROZ-P8	Amend	Transpower supports recognition of highly productive land but	Amend as follows:
	Inappropriate activities	would support recognition of activities provided for within the NPS-HPL, including specified infrastructure (as defined in the	RPROZ-P8 Inappropriate activities	
			NPS-HPL).	<u>Limit activities which:</u>
			Clauses 3.8 and 3.9 of the NPS-HPL provide consenting pathways for subdivision and land use consents for specified infrastructure on highly productive land. Transpower supports amendment to objective SUB-RUR-P6 to recognise the	1. are incompatible with the purpose, character and amenity values of the Rural production zone;

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			consenting pathways for specified infrastructure that are available under the NPS-HPL.	2. will result in the loss of productive capacity of highly productive land, except where the activity provides for specified infrastructure;  3. may generate reverse sensitivity effects and/or conflict with permitted activities in the zone; or  4. will result in development of an urban scale or amenity.
22.	RPROZ-R2 Buildings and structures (Permitted activity)	Amend	The Masterton to Upper Hutt 110kV overhead transmission line traverses the Rural Production Zone in the area around Kaitoke and Pakuratahi. In order to give effect to policies 10 and 11 of the NPSET, it is necessary to include appropriate standards and rules for development within the National Grid Yard within the Rural Production Zone.  Consequential amendment to rule RPROZ-R2 is necessary to refer to the National Grid Yard standard sought by Transpower under submission point 23.	Amend rule RPROZ-R2 to refer to the new National Grid Yard standard sought by Transpower under submission point 23
23.	Rural Production Zone – Standards for permitted activities	Amend	The Masterton to Upper Hutt 110kV overhead transmission line traverses the Rural Production Zone in the area around Kaitoke and Pakuratahi. In order to give effect to policies 10 and 11 of the NPSET, it is necessary to include appropriate standards and rules for development within the National Grid Yard within the Rural Production Zone.  Transpower seeks that a National Grid Yard standard is added to the table of standards for permitted activities in the Rural Production Zone. The standard should be the same as the National Grid Yard standard proposed for the General Rural Zone (GRUZ-S13), including the amendments sought by Transpower under submission point 16.	Add a National Grid Yard standard to the table of to the table of standards for permitted activities in the Rural Production Zone. The standard should be the same as the National Grid Yard standard proposed for the General Rural Zone (GRUZ-S13), including the amendments sought by Transpower under submission point 16.
24.	Rural Production Zone - Non- complying activity rules	Amend	The Masterton to Upper Hutt 110kV overhead transmission line traverses the Rural Production Zone in the area around Kaitoke and Pakuratahi. In order to give effect to policies 10 and 11 of the NPSET, it is necessary to include appropriate standards and	Add a non-complying activity rule to the table of non-complying activities in the Rural Production Zone, for buildings and structures that do not meet the National Grid Yard standard sought by Transpower under submission point 23.

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			rules for development within the National Grid Yard within the Rural Production Zone.  Consistent with rule GRUZ-R30 proposed for the General Rural Zone, Transpower seeks a non-complying activity rule to be added for buildings and structures that do not meet the National Grid Yard standard sought by Transpower under submission point 23. Refer submission point 17.	
25.	Rural Production Zone - Non- complying activity rule – Sensitive Activities	New rule	Transpower notes the RRZ zone does not include a sensitive activities rule (as is provided for RLZ-R26). Transpower supports the provision of a non-complying activity status rule for sensitive activities within the National Grid Yard, on the basis that this gives effect to policies 10 and 11 of the NPSET. While the likelihood for sensitive activities is more limited given the zoning, there remains the potential and this is required to be managed. Refer submission point 18.	Add a non-complying activity rule to the table of non-complying activities in the Rural Production Zone, for sensitive activities within the National Grid Yard, to reflect that provided in Rule RLZ-R26. Refer submission point 18.
RLZ – R	ural Lifestyle Zone			
26.	RLZ-P1 Appropriate activities	Amend	Transpower considers that an additional clause is necessary to recognise that activities are only enabled in locations that do not compromise the safe and efficient operation, maintenance, and upgrading of the National Grid.  Transpower considers this is necessary to give effect to policy 10 of the NPSET, and to provide further policy direction for activities that breach standard RLZ-S10.	Amend as follows:  RLZ-P1 Appropriate activities  Enable activities that are compatible with the purpose of the Rural lifestyle zone, while ensuring that their design, scale and intensity is appropriate to the rural environment, including:  1. farming activities and ancillary activities;  2. rural residential activities;  3. small scale commercial or non-residential activities which support or are ancillary to farming activities and residential activities, including visitor accommodation, farm stay, rural produce retail and home businesses;  4. educational facilities, educational activities and early childhood centres;

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
				5. rural tourism which contributes to the vitality and resilience of the District's economy; or
				6. passive recreation activities;
				where they:
				1. support the social, economic and cultural needs of the community;
				2. provide for varying forms, scale, and separation of buildings and structures, including additions and alterations
				3. manage the density and location of residential development;
				4. ensure adequate infrastructure is available to service the activity, including on-site servicing where reticulated services are not available;
				5. will not compromise the efficiency of the transport network;
				6. will not compromise the safe and efficient operation, maintenance, upgrading and development of the National Grid;
				67. manage reverse sensitivity effects on sensitive activities;
				<del>78</del> . minimise adverse effects on the environment.
27.	RLZ-P3	Amend	Policy 2 of the NPSET requires that decision-makers "recognise	Amend as follows:
	Infrastructure		and provide for the effective operation, maintenance, upgrading and development of the electricity transmission	RLZ-P4 Infrastructure
			network". Transpower considers that the policy needs to be amended to refer to maintenance, upgrading and development, in addition to operation, so that the policy gives effect to policy 2 of the NPSET.	To ensure that transport networks, transmission lines and other regionally significant network utilities are able to be operated, maintained, upgraded, and developed safely and efficiently.
			Transpower also considers that the amendment is necessary to ensure that the policy is consistent with policies NU-P5 and NU-P6, which seek to enable, amongst other matters, the efficient maintenance and upgrading of network utilities.	

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
28.	Buildings and structures, including alterations and additions except in the native bush — no development area of the Berketts farm structure plan complying with:  1. RLZ-S1; 2. RLZ-S2; 3. RLZ-S3; 4. RLZ-S3; 6. RLZ-S5; 6. RLZ-S1; 7. RLZ-S11; and 8. NOISE-S7 Permitted activity	Support	Transpower supports the rule on the basis that it incorporates standard RUZ-S10 (Buildings or structures within the National Grid Yard as a permitted activity standard.	Retain as notified.
29.	RLZ-S10  Buildings or structures within the national grid yard	Amend	Transpower generally supports the proposed standard and considers that it appropriately gives effect to policies 10 and 11 of the NPSET. However, Transpower considers the following amendments to the standard are necessary to improve District Plan interpretation and administration:  • Transpower considers amendments are required to the chapeau so that it adopts appropriate syntax for a standard. In addition to this, Transpower considers that the reference to "sites where under-build within the National Grid Yard did not exist at October 2023" makes the application of the standard unclear. The National Grid Yard standard should apply to all buildings and structures, regardless of whether there	Amend as follows:  RLZ-S10 Buildings or structures within the National gGrid yYard  On sites where under build within the national grid yard did not exist at October 2023 and where the proposed building or structure Buildings and structures must maintains the safe electrical distances required by NZECP34:2001 in all Nnational Ggrid line operating conditions, and does must not permanently physically impede existing vehicular access to a Nnational Ggrid support structure, provided that:  1. within the National Grid Yard:  a. any it is an alteration or addition to an existing building or structure for a sensitive activity that does

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			are existing buildings on the site located within the National Grid Yard.  It is appropriate to amend standard 1.a to provide for small accessory buildings within the National Grid Yard, where they comply with NZECP34:2001.  Several minor amendments to standard 1 are sought to improve interpretation of the standard.  Standard 3 should be deleted on the basis that it is not applicable within the district. All transmission lines that traverse the district are on tower support structures, and there are no transmission lines that are on pi-pole support structures.	not involve an increase in the building height or footprint, or an accessory building for a sensitive activity that is no more than 2.5m in height and no more than 10m² in area; or  b. it is a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); or  c. it is a non-habitable building or structure for farming activities in rural zones (but not including any building for intensive farming, commercial greenhouses or milking/dairy sheds, although ancillary buildings associated with these uses are permitted); or  d. it is a yard for milking/dairy sheds; or  e. it is an artificial crop protection structure or crop support structure (excluding commercial greenhouses and PSA structures); or  f. it is a fence less than 2.5m in height above ground level;  And  2. around the Neational Gerid support structures, the building or structure is at least 12m from the outer visible edge of any Neational Gerid support structure foundation and associated stay wire, and does not physically impede existing vehicular access to a Neational Gerid support structure unless it is one of the following:  a. a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes);

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
30.	RLZR24-R25	Support	Transpower supports non-complying activity status for buildings or structures within the National Grid Yard that do not	b. a fence no greater than 2.5m high above ground level and no closer than 6m to the nearest Nnational Garid support structure; or  c. a building or structure where Transpower has given written approval in accordance with clause 2.4.1 of NZECP34:2001;  3. around national grid support structures, an artificial crop protection or crop support structure between 8m and 12m from a pi-pole support structure (but not a tower) and any associated guy wire (but not a tower), that:  a. is not more than 2.5m high above ground level; b. is removable or temporary, to allow a clear working space 12m from the pole when necessary for maintenance and emergency repair purposes; c. allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; and d. meets the requirements of the NZECP34:2001 for separation distances from the conductor.  Retain as notified (but amend the reference to National Grid Yard to have capital letters)
	Buildings or structures within 12m of high voltage (110kV or greater) electricity transmission lines as shown on the Planning Maps *(refer to the definition of transmission line) national grid yard that does not meet RLZ-S10 and buildings or structures in the native bush — no development area in Appendix 3 - Berketts farm structure plan.		buildings or structures within the National Grid Yard that do not meet standard RLZ-S10, on the basis that this gives effect to policies 10 and 11 of the NPSET.	Yard to have capital letters)

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
	Non complying			
31.	Sensitive activities within the national grid yard, including:  1. Any new building for a sensitive activity;  2. Any addition to an existing building that involves an increase in the building envelope or height for a sensitive activity;  3. Any change of use of an existing building to a sensitive activity; or  4. The establishment of any new sensitive activity.	Support	Transpower supports non-complying activity status for sensitive activities within the National Grid Yard, on the basis that this gives effect to policies 10 and 11 of the NPSET.	Retain as notified (but amend the reference to National Grid Yard to have capital letters).
Plannii	ng maps			
32.	District Plan maps generally	Amend	The operative District Plan maps currently identify the National Grid as high voltage lines under the District Plan Hazards layer. This is not consistent with standard 13 (mapping standard) and Table 20 of the National Planning Standards, which requires that the national grid is separately identified and labelled as the national grid.  Clear identification of the National Grid in the District Plan maps will improve the clarity of the planning maps for District Plan users looking to understand the spatial application of the National Grid provisions. It is also necessary to give effect to the proposed definition of national grid, which states that the National Grid "is identified as the "National Grid" on the planning maps".  Given the operative District Plan uses the term 'transmission lines' and PC50 uses the term 'National Grid', it is	Amend the District Plan maps to identify the National Grid as a separate layer on the District Plan maps, in accordance with standard 13 (mapping standard) and Table 20 of the National Planning Standards. Given the operative District Plan uses the term 'transmission lines' and PC50 uses the term 'National Grid', it is recommended the reference be 'National Grid / transmission lines'.

Sub. point	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
			recommended the reference be 'National Grid / transmissions lines'.	
33.	Rezoning of the following properties in Riverstone Terraces to General Residential Zone:  • 137 Kirton Drive (Lot 2 DP 502501)  • 66 Riverstone Drive (Lot 74 DP 458127)  • 68 Riverstone Drive (Lot 75 DP 458127)  • 70 Riverstone Drive (Lot 76 DP 458127)  Refer map 3.1 in Appendix 4 for scope of submission.	Oppose	A notable extent of the area proposed to be rezoned as General Residential Zone is located within close proximity to the National Grid (refer map 3.1 in Appendix 4).  Transpower does not necessarily oppose the rezoning but wishes to ensure the National Grid/transmission line provisions are applied to the rezoned land, noting that the operative District Plan provisions would apply to the land to be rezoned General Residential. For information purposes, the maps attached as Appendix 4 show the proposed rezoned areas, the National Grid line and the following setbacks:  - The 12m setback (being a NC activity within the operative District Plan and under PC50)  - The 12-20 setback (being an RDA within the operative District Plan that applies to the residential zone, and also manages subdivision within the operative District Plan)  - The 32m setback (being the National Grid Subdivision Corridor within PC50)	Ensure the National Grid/transmission line provisions are applied to the rezoned land.
34.	Rezoning of the following properties in Totara Park to General Residential Zone:  Part of 27 Colorado Road (Lot 500 DP573035)  Part of 4 Colorado Road (Lot 1002 DP 573035)  Refer map 3.2 in Appendix 4 for scope of submission.	Oppose	Refer to submission point 33.	Ensure the National Grid/transmission line provisions are applied to the rezoned land.

Sub. point #	Specific Plan Change Provisions	Support/ Oppose/ Amend	Submission	Relief sought
35.	Rezoning of the following properties in Birchville to General Residential Zone:	Oppose	Refer to submission point 33.	Ensure the National Grid/transmission line provisions are applied to the rezoned land.).
	<ul> <li>Part of 150 Gillespies</li> <li>Road (Lot 2 DP 52807)</li> </ul>			
	<ul> <li>Part of 136 Fairview</li> <li>Drive (Lot 2 DP</li> <li>496016)</li> </ul>			
	Refer map 3.3 in <b>Appendix 4</b> for scope of submission.			

Appendix 2 – National Policy Statement on Electricity Transmission	2008
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# NATIONAL POLICY STATEMENT

# on Electricity Transmission

Issued by notice in the Gazette on 13 March 2008

# CONTENTS

# Preamble

- Title
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- 5. Objective
- 6. Recognition of the national benefits of transmission
- 7. Managing the environment effects of transmission
- 8. Managing the adverse effects of third parties on the transmission network
- 9. Maps
- 10. Long-term strategic planning for transmission assets

newzealand.govt.nz

# Preamble

This national policy statement sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.

In accordance with section 55(2A)(a) of the Act, and within four years of approval of this national policy statement, local authorities are to notify and process under the First Schedule to the Act a plan change or review to give effect as appropriate to the provisions of this national policy statement.

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act. These include:

- Transporting electricity efficiently over long distances requires support structures (towers or poles), conductors, wires and cables, and sub-stations and switching stations.
- These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant.
- The transmission network is an extensive and linear system which makes it important that there are consistent policy and regulatory approaches by local authorities.
- Technical, operational and security requirements associated with the transmission network
  can limit the extent to which it is feasible to avoid or mitigate all adverse environmental
  effects.
- The operation, maintenance and future development of the transmission network can be significantly constrained by the adverse environmental impact of third party activities and development.
- The adverse environmental effects of the transmission network are often local while the benefits may be in a different locality and/or extend beyond the local to the regional and national making it important that those exercising powers and functions under the Act balance local, regional and national environmental effects (positive and negative).
- Ongoing investment in the transmission network and significant upgrades are expected
  to be required to meet the demand for electricity and to meet the Government's objective
  for a renewable energy future, therefore strategic planning to provide for transmission
  infrastructure is required.

The national policy statement is to be applied by decision-makers under the Act. The objective and policies are intended to guide decision-makers in drafting plan rules, in making decisions on the notification of the resource consents and in the determination of resource consent applications, and in considering notices of requirement for designations for transmission activities.

However, the national policy statement is not meant to be a substitute for, or prevail over, the Act's statutory purpose or the statutory tests already in existence. Further, the national policy statement is subject to Part 2 of the Act.

For decision-makers under the Act, the national policy statement is intended to be a relevant consideration to be weighed along with other considerations in achieving the sustainable management purpose of the Act.

This preamble may assist the interpretation of the national policy statement, where this is needed to resolve uncertainty.

## 1. Title

This national policy statement is the National Policy Statement on Electricity Transmission 2008.

# 2. Commencement

This national policy statement comes into force on the 28th day after the date on which it is notified in the *Gazette*.

# Interpretation

In this national policy statement, unless the context otherwise requires: **Act** means the Resource Management Act 1991.

**Decision-makers** means all persons exercising functions and powers under the Act.

Electricity transmission network, electricity transmission and transmission activities/ assets/infrastructure/resources/system all mean part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.

National environmental standard means a standard prescribed by regulations made under the Act.

**National grid** means the assets used or owned by Transpower NZ Limited. **Sensitive activities** includes schools, residential buildings and hospitals.

# 4. Matter of national significance

The matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity transmission network.

# 5. Objective

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:

- · managing the adverse environmental effects of the network; and
- managing the adverse effects of other activities on the network.

# 6. Recognition of the national benefits of transmission

## POLICY 1

In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:

- i) maintained or improved security of supply of electricity; or
- ii) efficient transfer of energy through a reduction of transmission losses; or
- iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or
- iv) enhanced supply of electricity through the removal of points of congestion.

The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.

# 7. Managing the environmental effects of transmission

## POLICY 2

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

## POLICY 3

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.

## POLICY 4

When considering the environmental effects of new transmission infrastructure or major upgrades of existing transmission infrastructure, decision-makers must have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.

## POLICY 5

When considering the environmental effects of transmission activities associated with transmission assets, decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

## POLICY 6

Substantial upgrades of transmission infrastructure should be used as an opportunity to reduce existing adverse effects of transmission including such effects on sensitive activities where appropriate.

#### POLICY 7

Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.

## POLICY 8

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

#### POLICY 9

Provisions dealing with electric and magnetic fields associated with the electricity transmission network must be based on the International Commission on Non-ioninsing Radiation Protection *Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz)* (Health Physics, 1998, 74(4): 494-522) and recommendations from the World Health Organisation monograph *Environment Health Criteria* (No 238, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.

# 8. Managing the adverse effects of third parties on the transmission network

## POLICY 10

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

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).

# 9. Maps

## POLICY 12

Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.

# 10.Long-term strategic planning for transmission assets

## POLICY 13

Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

## POLICY 14

Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

## Explanatory note

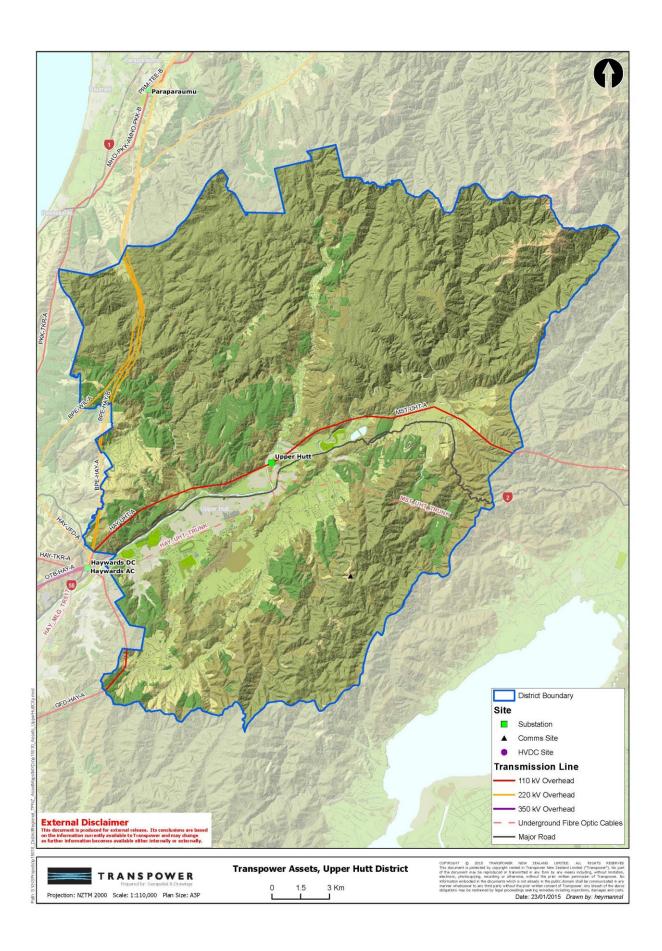
This note is not part of the national policy statement but is intended to indicate its general effect

This national policy statement comes into force 28 days after the date of its notification in
the *Gazette*. It provides that electricity transmission is a matter of national significance under the

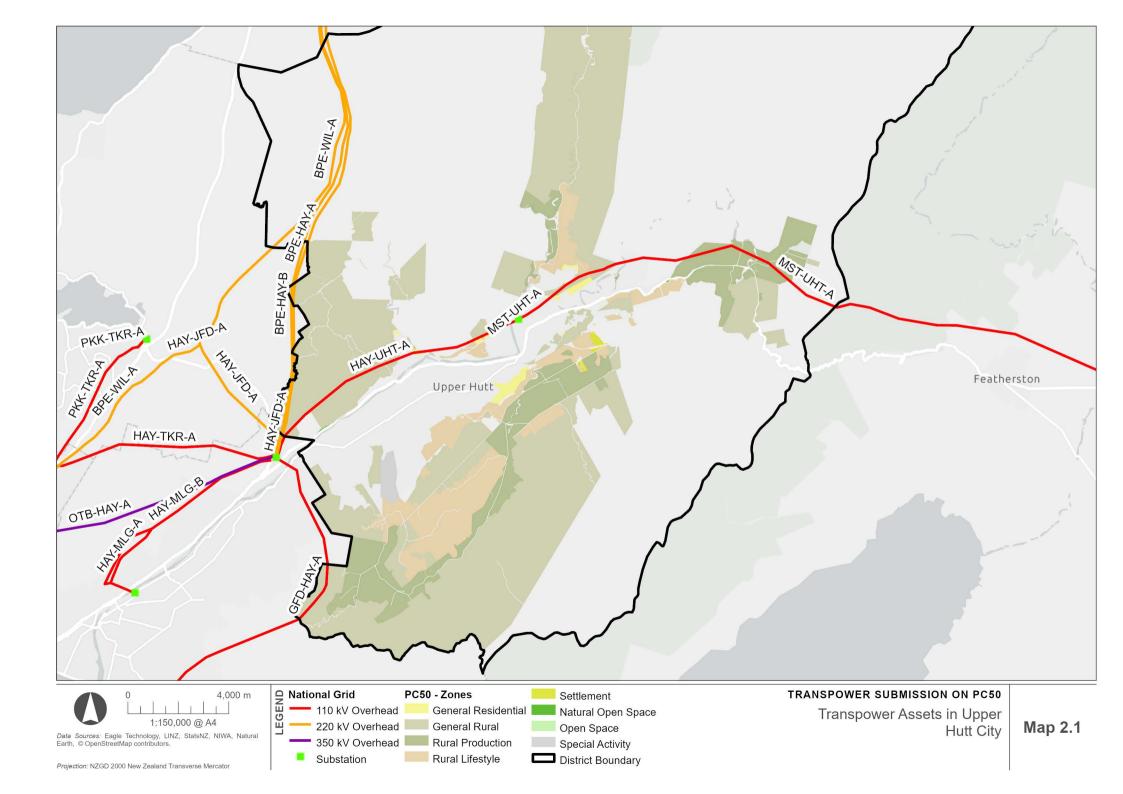
Resource Management Act 1991 and prescribes an objective and policies to guide the making of resource management decisions.

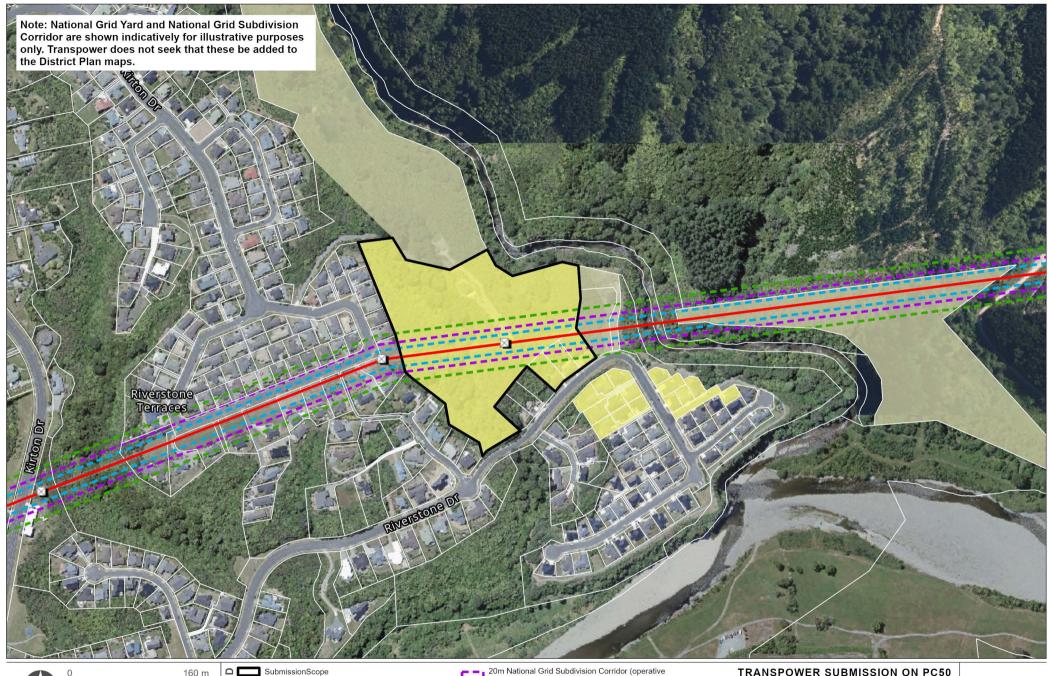
The national policy statement requires local authorities to give effect to its provisions in plans made under the Resource Management Act 1991 by initiating a plan change or review within four years of its approval.

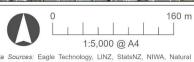
# **Appendix 3 – Map of Transpower Assets in Upper Hutt City**



Appendix 4 – Maps sho	wing Transpower su	ibmissions on pro	oposed rezoning







Data Sources: Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

Double Circuit Steel Tower 110 kV Overhead Tali National Grid Yard (12m)

20m National Grid Subdivision Corridor (operative corridor that applies to the General Residential Zone)

32m National Grid Subdivision Corridor (proposed PC50 corridor, only proposed to apply to the rural zones)

PC50 - Zones

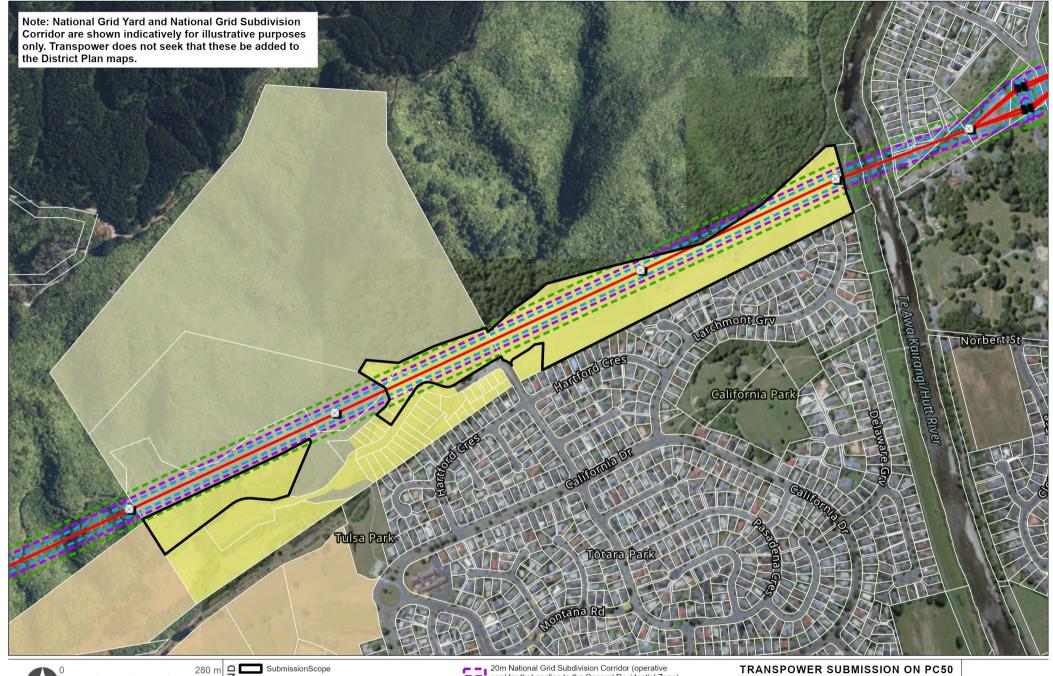
General Residential General Rural

# TRANSPOWER SUBMISSION ON PC50 Rezone to General Residential Zone

Note: National Grid Yard shown indicatively only. Yard shown in these drawings does not include additional extent of yard setback from the edge of National Grid structures.

Map 3.1

Riverstone Terraces





Information New Zealand, GEBCO, Community maps contributors

280 m SubmissionScope

Double Circuit Stee
Termination Double Circuit Steel Tower 110 kV Overhead ■ National Grid Yard (12m)

20m National Grid Subdivision Corridor (operative corridor that applies to the General Residential Zone)

32m National Grid Subdivision Corridor (proposed PC50 corridor, only proposed to apply to the rural zones)

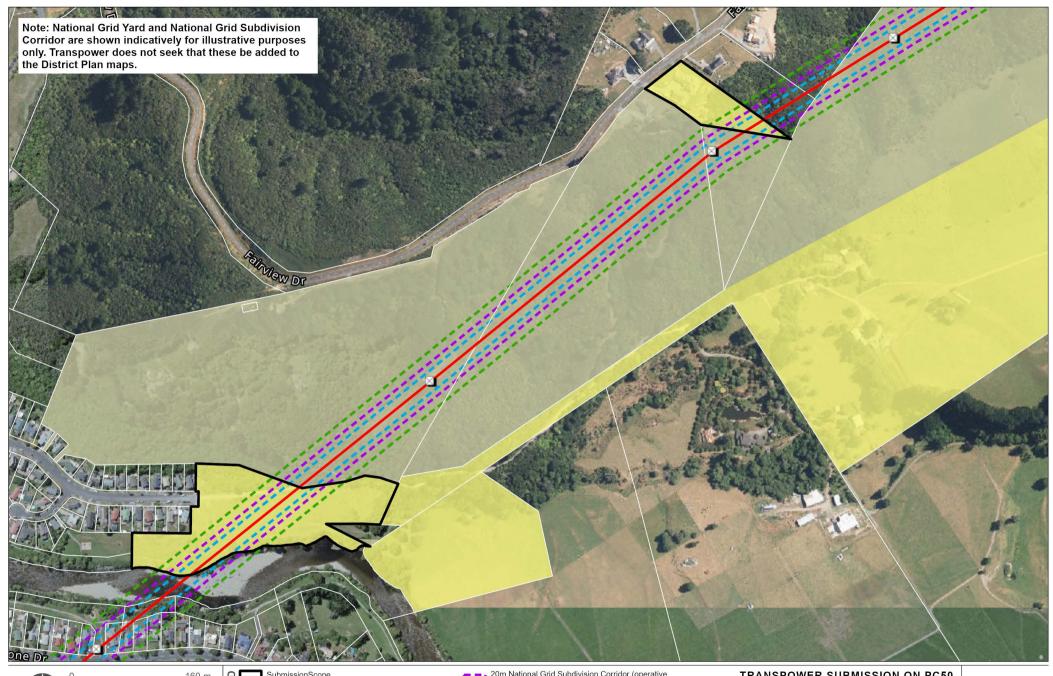
PC50 - Zones

General Residential General Rural

# Rezone to General Residential Zone Totara Park

Map 3.2

Note: National Grid Yard shown indicatively only. Yard shown in these drawings does not include additional extent of yard setback from the edge of National Grid structures.





Data Sources: Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

Information New Zealand, GEBCO, Community maps contributors

SubmissionScope

Double Circuit Steel Tower

110 kV Overhead

National Grid Yard (12m)

20m National Grid Subdivision Corridor (operative corridor that applies to the General Residential Zone)

32m National Grid Subdivision Corridor (proposed PC50 corridor, only proposed to apply to the rural zones)

PC50 - Zones

General Residential
General Rural

# TRANSPOWER SUBMISSION ON PC50 Rezone to General Residential Zone Birchville

Map 3.3

Note: National Grid Yard shown indicatively only. Yard shown in these drawings does not include additional extent of yard setback from the edge of National Grid structures.