



TRANSPOWER

Keeping the energy flowing

PC51 - Sub 1

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23 August 2016

Whanganui District Council
PO Box 637
Whanganui

Attention: Leayne Huirua
leayne.huirua@whanganui.govt.nz

Dear Leayne,

**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON WHANGANUI
DISTRICT COUNCIL PROPOSED PLAN CHANGE 51: MISCELLANEOUS
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE
MANAGEMENT ACT 1991**

1. Transpower **opposes** the proposed Whanganui District Plan Change 51 **in part**.
2. The reasons for the submission by Transpower are set out below.
3. Transpower **wishes to be heard** in support of this submission and would not consider presenting a joint case at the hearing.
4. Transpower could not gain an advantage in trade competition through this submission.

Transpower New Zealand Limited ("Transpower") is the State Owned Enterprise that plans, builds, maintains and operates New Zealand's high voltage transmission network (the National Grid) which links generators to distribution companies and major industrial users. The National Grid, which extends from Kaikohe in the North Island down to Tiwai in the South Island, transports electricity throughout New Zealand.

The National Grid comprises some 12,000 km of transmission lines and 167 substations. This is supported by a telecommunications network of some 300 telecommunication sites that link together the components that make up the National Grid. Transpower's assets within the Whanganui District include:

- Brunswick-Bunnythorpe A (BRK-BPE A) 220kV transmission line on double circuit steel towers;
- Brunswick-Stratford A (BRK-SFD A) 220kV transmission line on double circuit steel towers;
- Brunswick-Stratford B (BRK-SFD B) 220kV transmission line on double circuit steel towers;
- Whanganui-Stratford A (WGN-SFD A) 110kV transmission line on single circuit pi poles; and
- Bunnythorpe-Whanganui B (BPE-WGN B) 110kV transmission line on double circuit steel towers.

In addition, Transpower operates substations at Brunswick and Whanganui. A map showing the location of these National Grid assets in Whanganui is attached.

The importance of Transpower's assets and function have been recognised at a national level through the Resource Management Act's (RMA) instruments of the National Policy Statement on Electricity Transmission (NPSET) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA). A District Plan (including proposed plan change) is required to give effect to the NPSET (section 75(3) RMA).

The Whanganui District Council has already given effect to the NPSET in part within the District Plan through Plan Change 36 – Chapter 3 Rural Environment.¹ Transpower lodged an appeal on Plan Change 36, which is now resolved and recorded in a consent order dated December 2015.²

Transpower has reviewed Proposed Plan Change 51 and **opposes** the proposed definition of "structure". The agreed National Grid Yard rules control activities and structures within 12 metres of the National Grid conductors and support structures. Specifically, operative rules 3.4.1(l) and 3.8.1(l) permit certain "structures" within 12 metres of National Grid towers and poles. The "structures" that are permitted include fences provided they are less than 2.5m in height and at least 5m from a National Grid tower or pole. Fences can locate within 5m of towers or poles where they meet the specified requirements of NZECP34:2001.

The proposed definition of "structure" in notified Plan Change 51, would have the effect of making fences, walls and retaining walls below the heights listed in the definition exempt from the National Grid Yard controls in Chapter 3, Rural Environment. This is because retaining walls less than 1.5m in height and fences and walls less than 1.8m in height are not considered to be 'structures' under the proposed definition and therefore would be excluded from rules 3.4.1(l) and 3.8.1(l). This does not give appropriate effect to Policy 10 of the NPSET in Transpower's submission. Policy 10 states:

*"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.**"*

(emphasis added)

Walls, retaining walls and fences even at low heights, should not be allowed to locate too close to National Grid poles and towers because they could compromise access for routine or emergency maintenance work or create electrical hazard risks. This would undermine the District Plan's implementation of the NPSET in relation to structures.

Transpower therefore seeks that the definition is amended to state that the exclusions do not apply in relation to the National Grid Yard. See Schedule 1 for the specific relief sought.

Please contact me on (09) 590 7072 or environment.policy@transpower.co.nz if you have any queries or should you require clarification of any matter.

Yours faithfully
TRANSPOWER NZ LTD



Rebecca Eng
Senior Environmental Planner

¹ Part operative 21 May 2016

² Consent Order dated 21 December 2015 (Environment Court Reference ENV-2015-WLG-000039).

Schedule 1: Transpower New Zealand Limited –Submission – Transpower relief shown as underlined and blue

Clause/Section	Title	Support/Oppose	Relief Sought	Amendment	Reason
Chapter 2	Definitions: “Structure”	Oppose	Amend	<p>Structure: means any building, equipment, device or other facility made by people and which is fixed to land and includes any raft. Excluding <u>(other than within the National Grid Yard): any fence or wall (other than a retaining wall) located within 1 metre of a property boundary,</u></p> <ul style="list-style-type: none"> a. <u>Any retaining wall less than 1.5m in height measured from the lowest adjoining ground level.</u> b. <u>Any fence or wall (other than a retaining wall) less than 1.8 metres in height measured from the lowest adjoining ground level within 1 metre of a property boundary.</u> c. <u>Any pool or tank which is less than 1.0m in height measured from the lowest adjoining ground level.</u> d. <u>Play equipment and letterboxes.</u> 	As notified, the definition would have the effect of making fences, walls and retaining walls below the heights listed in the definition exempt from the National Grid Yard controls in Chapter 3, Rural Environment. In addition to other matters, the National Grid Yard rules seek to control structures relative to their horizontal distance from National Grid support structures, including fences less than 1.8 metres in height. If not appropriately managed, the location of some structures can compromise the safe and efficient operation, maintenance, upgrading and development of the National Grid. This would undermine the District Plan’s implementation of the NPSET in relation to structures.

