

Submission on a Change to the Tasman Resource Management Plan

Return your submission by the advertised closing date to:

Manager, Policy
Tasman District Council
Private Bag 4, Richmond 7050 OR
189 Queen Street, Richmond OR
Fax 03 543 9524 OR Email steve.markham@tasman.govt.nz

Cover Sheet

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Submitter No.

174

Note:

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Submitter Name: Transpower New Zealand Limited
(organisation/individual)

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Date: 14-Mar-2016

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PO Box 10170
The Terrace
Wellington 6143

Signature: _____

NOTE: A signature is not required if you make your submission by electronic means.

Total number of pages submitted (including this page): _____

IMPORTANT – Please state:

This submission relates to Change No.: 60

Change Title/Subject:

Proposed Change 60: Rural Land Use and
Subdivision Policy Review

I/we wish to be heard in support of my/our submission.

I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Please attach this cover sheet to your supplementary sheet(s) outlining your submission request(s).

To: Tasman District Council

Submission by Transpower New Zealand Limited to
Proposed Plan Change 60: Rural Land Use and Subdivision
Policy Review to the Operative Tasman Resource
Management Plan

14 March 2016

Keeping the energy flowing



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**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON
PROPOSED PLAN CHANGE 60 TO
THE OPERATIVE TASMAN RESOURCE MANAGEMENT PLAN:
RURAL LAND USE AND SUBDIVISION POLICY REVIEW**

Clause 6 of First Schedule, Resource Management Act 1991

To: Manager, Policy
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Email: steve.markham@tasman.govt.nz

NAME OF SUBMITTER: Transpower New Zealand Limited
(Note address for service below)

1.0 INTRODUCTION

1.1 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 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. The national control centres (located in Wellington and Hamilton) operate a network of some 300 telecommunication sites that link together the components that make up the National Grid.

1.2 Transpower's role is to ensure that the National Grid continues to meet the needs of its users both in the short and in the long term. In its 30 year strategy for future development, entitled 'Transmission Tomorrow' Transpower outlines the view that there will be an on-going role for the National Grid and the associated lines and substations. In order for this to occur, it is crucial that development under the lines and around other National Grid infrastructure is appropriately managed to ensure continued access to and protection of these assets. Where new infrastructure is required it is important that this is recognised and provided for.

- 1.3 The unique role that Transpower plays in the provision of electricity throughout New Zealand means that its electricity infrastructure is considered a significant physical resource under the Resource Management Act 1991 (RMA) that must be sustainably managed. In turn, adverse effects on that infrastructure must be avoided, remedied or mitigated.
- 1.4 These adverse effects can occur as a result of development within close proximity to the National Grid, and include (but are not limited to):
 - health and safety effects;
 - reverse sensitivity effects;
 - restricting access to infrastructure for required maintenance or upgrades; and
 - direct effects of third party activities on the National Grid.
- 1.5 It is also acknowledged that the National Grid infrastructure, due to its linear nature and sheer scale, can have adverse effects on the environment. The relevant requirements are prescribed by the National Policy Statement on Electricity Transmission ("**NPSET**"), which is discussed below.
- 1.6 Released in March 2008, the NPSET confirms the national significance of the National Grid as a resource and the need to appropriately manage activities and development close to it. Under the RMA, the Tasman Resource Management Plan ("**TRMP**") must give effect to a national policy statement and regional policy statement under s55 and s75(3), respectively.
- 1.7 Tasman District Council's ("**TDC**" or "**the Council**") Proposed Plan Change 60 ("**PC60**") applies to areas which are traversed by National Grid infrastructure, and does not respond to statutory requirements under the Resource Management Act 1991 ("**RMA**" or "**the Act**") relating to electricity infrastructure and to the NPSET.
- 1.8 PC60 affects areas across the District in close proximity to National Grid infrastructure. In this context, the infrastructure affected by the plan change comprises National Grid assets (lines and substations). A detailed map

showing the specific area affected by PC 60 is included in **Attachment 1**, and includes:

- Kikiwa Substation;
- Murchison Substation;
- 110kV Kikiwa-Stoke B line (KIK-STK B);
- 110kV Blenheim-Kikiwa A line (BLN-KIK A);
- 110kV Inangahua-Kikiwa B line (IGH-KIK B);
- 220 kV Kikiwa-Stoke A line (KIK-STK A);
- 220 kV Inangahua-Kikiwa A line (IGH-KIK A);and
- 220 kV Islington-Kikiwa A and B lines (ISL-KIK-A and ISL-KIK-B)

1.9 These assets predominantly traverse the Rural 2 and Conservation Zones of the TRMP, though the National Grid transmission lines run through a number of smaller areas of Rural 1 Zone, including to the south of Wakefield. To the southeast of Richmond, the National Grid transmission lines traverse an area of Rural 2 Zone which is also deferred Rural Residential Zone.

1.10 Both the Kikiwa and Murchison substations are designated, and are also located within the Rural 2 Zone.

2.0 THE STATUTORY CONTEXT

- 2.1 Before providing the detail of Transpower's decisions requested on PC60, it is relevant to outline the statutory context from which Transpower's submission is based.

National Policy Statement on Electricity Transmission 2008

- 2.2 The NPSET provides a platform to direct decision-makers in the management of the effects of and on the electricity transmission network. The NPSET includes one 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:

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

- 2.3 To implement this objective, the NPSET contains 14 policies that provide guidance to decision-makers exercising functions under the RMA. **Policy 1** directs decision-makers to recognise and provide for the benefits of electricity transmission at national, regional and local levels, while **Policies 2 - 9** guide the management of the environmental effects of transmission. **Policies 10 and 11** seek that decision-makers, and specifically local authorities, manage adverse effects on the transmission network which may result from third parties. **Policy 12** requires district councils to identify the electricity network on their planning maps. **Policy 13** requires decision makers to recognise the designation process as facilitating long-term planning of the infrastructure and **Policy 14** is directed towards regional councils.
- 2.4 Policies 2, 10 and 11 of the NPSET are of particular relevance to managing the activities of others around the National Grid infrastructure.
- 2.5 The preamble to the NPSET makes it clear that decision-makers are to be guided by the NPSET when drafting plan rules and that it should be taken into account during the hearing and decision-making process. Further, s75(3)(a) of the Act requires any District Plan to give effect to the NPSET. This is a strong

direction. Under the NPSET, all Councils are to have given effect to the NPSET within 4 years of its approval. The period for giving effect to the NPSET ended on 10 April 2012.

Tasman Regional Policy Statement

- 2.6 The Tasman Regional Policy Statement (“**RPS**”) became operative on 1 July 2001. It contains the broad issues, objectives and policies for the Tasman District.
- 2.7 The RPS does not specifically refer to the NPSET, and was made operative before the NPSET’s gazettal. The RPS does, however, contain a number of broad provisions relating to electricity infrastructure under Section 5 – Urban Development, and Section 12 – Other Significant Resource Management Issues.
- 2.8 The following objectives and policies are considered most relevant to the NPSET:

Objective 5.6

Avoidance, remedying or mitigation of the adverse effects of the form and location of urban development on efficient transmission and use of all forms of energy.

Objective 12.1

The use and development of natural and physical resources for the generation and distribution of energy, in a manner which is efficient and which avoids, remedies or mitigates any adverse effects on the environment.

Policy 12.1

The Council will seek to provide for the continuation of energy generation, transmission, or use opportunities, while avoiding, remedying or mitigating the adverse effects of such actions on natural, heritage and amenity values of resources.

- 2.9 Under s55 and s75(3)(c) of the RMA, the TRMP is required to give effect to the Tasman RPS.

Operative TRMP

- 2.10 Transpower acknowledges that there are some provisions within the Operative District Plan which provide for the management of subdivision and land use activities near National Grid infrastructure, though these provisions:
- 3.1.1 pre-date the NPSET;
 - 3.1.2 are out of date in that they relate to assets in parts of the District which have been divested by Transpower; and/or
 - 3.1.3 are limited to the Richmond East Development Area only.
- 2.11 In this way, the operation, maintenance, development and upgrading of the majority of Transpower assets within the Tasman District are not provided for under the TRMP. Nor are these assets afforded appropriate protection from inappropriate subdivision, use and development.
- 2.12 There are also provisions in the TRMP relating to the protection of transmission lines in the Richmond West Development Area. Transpower notes that these lines were divested to Network Tasman on 1 December 2014. These provisions, therefore, include incorrect references and the plan change has not corrected these.

Draft Plan Change 54

- 2.13 Transpower provided feedback to TDC on draft Plan Change 54, being the working title for the PC60. The primary message from Transpower in that feedback was that any rural land use and subdivision plan change should implement the NPSET.
- 2.14 Transpower notes that the TDC document "*Assessment of Feedback, July 2015*" gave no material consideration to the feedback provided by Transpower on the draft plan change. Furthermore, this lack of consideration of feedback

has been carried through to the approach taken to the NPSET in PC60, which does not give effect to the NPSET.

Proposed Plan Change 60

2.15 The Council's Report on Assessment of Alternatives under Section 32 of the RMA states that *"Plan change 60 is the outcome of the Council's review of the rural land use and subdivision objectives and provisions of the Tasman Resource Management Plan (the Plan)."*¹

2.16 Transpower considers that any review of rural land use and subdivision should consider and give effect to the NPSET to the extent relevant for the rural zones. This is an express requirement under s75(3) of the RMA. To this end, and given the finding above that the operative TRMP does not give effect to the NPSET, the plan change should include objectives, policies, rules and other methods to implement the NPSET as it relates to the National Grid in Tasman's rural areas. This is particularly relevant as the NPSET has not been given effect to by way of any other plan change since its gazettal in 2008.

2.17 While Transpower acknowledges previous discussions with TDC, which have indicated that that a plan change to give effect to the NPSET is in early developmental stages, there is a high level of uncertainty regarding the timing and content of such a plan change.

2.18 In the interim, and given that the majority of the National Grid infrastructure which transverses the Tasman region is located within one or other of the rural zones, it is most appropriate to include suitable provisions that give effect to the NPSET through PC60. This will ensure that the national significance of the National Grid is recognised, and that any adverse effects of other activities in the rural area on the National Grid are sufficiently managed as envisaged by the NPSET.

¹ Report on Assessment of Alternatives under Section 32 of the Resource Management Act, *Rural Land Use & Subdivision Policy Review – Proposed Plan Change 60, January 2016*, page 7.

- 2.19 Transpower's submission to PPC60 is certainly within scope, given that it is "on the plan change", noting that PC60 is described as the Rural Land Use and Subdivision Policy Review.
- 2.20 As **both the operative and proposed Plan fail to give effect to the NPSET**, Transpower generally seeks that PC60 be amended to include provisions to give effect to the NPSET.
- 2.21 Specific provisions are sought through this submission within Chapter 2 (Meanings of Words), Chapter 7 (Rural Environment Effects), Chapter 16 (General Rules around Subdivision), Chapter 17 (Zone Specific Rules), and Chapter 18 (Special Areas Rules). It is noted that these provisions are not the only alternative for giving effect to the NPSET through this plan change, and there may be merit in considering other means of implementing Transpower's relief through alternative objectives, policies, rules and other methods.

3.0 GENERAL POSITION ON THE PROPOSED PLAN CHANGE & FORMAT OF RELIEF SOUGHT

- 3.1 Transpower **opposes** the proposed plan change insofar as it does not give effect to the NPSET and fails to appropriately recognise and protect National Grid transmission infrastructure within the District's rural areas.
- 3.2 Transpower considers that **amendments to the plan change provisions are required** to ensure that the NPSET and RPS are implemented as directed by the RMA.
- 3.3 Broadly, Transpower does not oppose the new provisions introduced by PC60 – particularly those provisions which seek to more effectively manage future subdivision, use and development in rural zones. However, Transpower notes that the operative Rural Zones contain no provisions to manage subdivision and land use in proximity to the National Grid. To this end, **both the operative and proposed Plan fail to give effect to the NPSET**.

- 3.4 It is critical that PC60 is amended to ensure that there will be consistent and effective implementation of the NPSET across all rural zones, which are the subject of the propose Plan Change.
- 3.5 Transpower seeks that the NPSET is given effect through the table of provisions included as **Attachment 2** to this document.
- 3.6 Transpower's general relief is provided immediately below, followed by more specific relief organised by the relevant Chapters of PC60 and the TRMP.

Relief Sought: General

1. That PC60 is **amended** to ensure that (in the Rural Zones):
 - the National Policy Statement for Electricity Transmission 2008 is fully given effect to in the Tasman Resource Management Plan;
 - the Regional Policy Statement is given effect to as it relates to the management of effects on the effective operation, maintenance and development of the National Grid; and
 - the National Grid (including transmission lines and substations) is protected from adverse effects (including reverse sensitivity effects) of subdivision, land use and development in proximity to electricity transmission infrastructure, including through use of appropriate objectives, policies, rules and other methods in the District Plan.
2. That any other consequential amendments are made to the issues, objectives, policies, rules and other methods necessary to give effect to the relief sought in this submission, including consequential amendments relating to divested lines now held by Network Tasman.

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4.0 DECISIONS REQUESTED ON SPECIFIC PROVISIONS

- 4.1 Without derogating from the general relief set out in section 3 above, Transpower's decisions requested on the plan change provisions are detailed in **Attachment 2**.
- 4.2 These proposed amendments are provided as one option for achieving Transpower's relief sought; however, Transpower notes that there may be other means of drafting provisions to achieve this same outcome. To this end, Transpower welcomes opportunities to confer with the Council and/or other interested parties if desired.

Relief Sought: Amendments to plan change provisions

3. That the plan change is amended by adopting the proposed changes to TRMP Chapters 2, 7, 16, 17 and 18 set out in **Attachment 2**, including any consequential amendments to the Plan's issues, objectives, policies, rules or other methods; or
4. Such similar relief as the scope of Transpower's decisions requested is otherwise achieved.

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- 5.0 **Transpower wishes to be heard in support of this submission.**
- 6.0 **If others make a similar submission, Transpower would not be prepared to consider presenting a joint case at any hearing.**
- 7.0 **Transpower could not gain an advantage in trade competition through this submission.**
- 8.0 **Transpower is directly affected by an effect of the subject matter of the submission that —**
- (A) **adversely affects the environment; and**
- (B) **does not relate to trade competition or the effect of trade competition.**

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ATTN: Rhedyn Law

Approved for release by:

Rebecca Eng

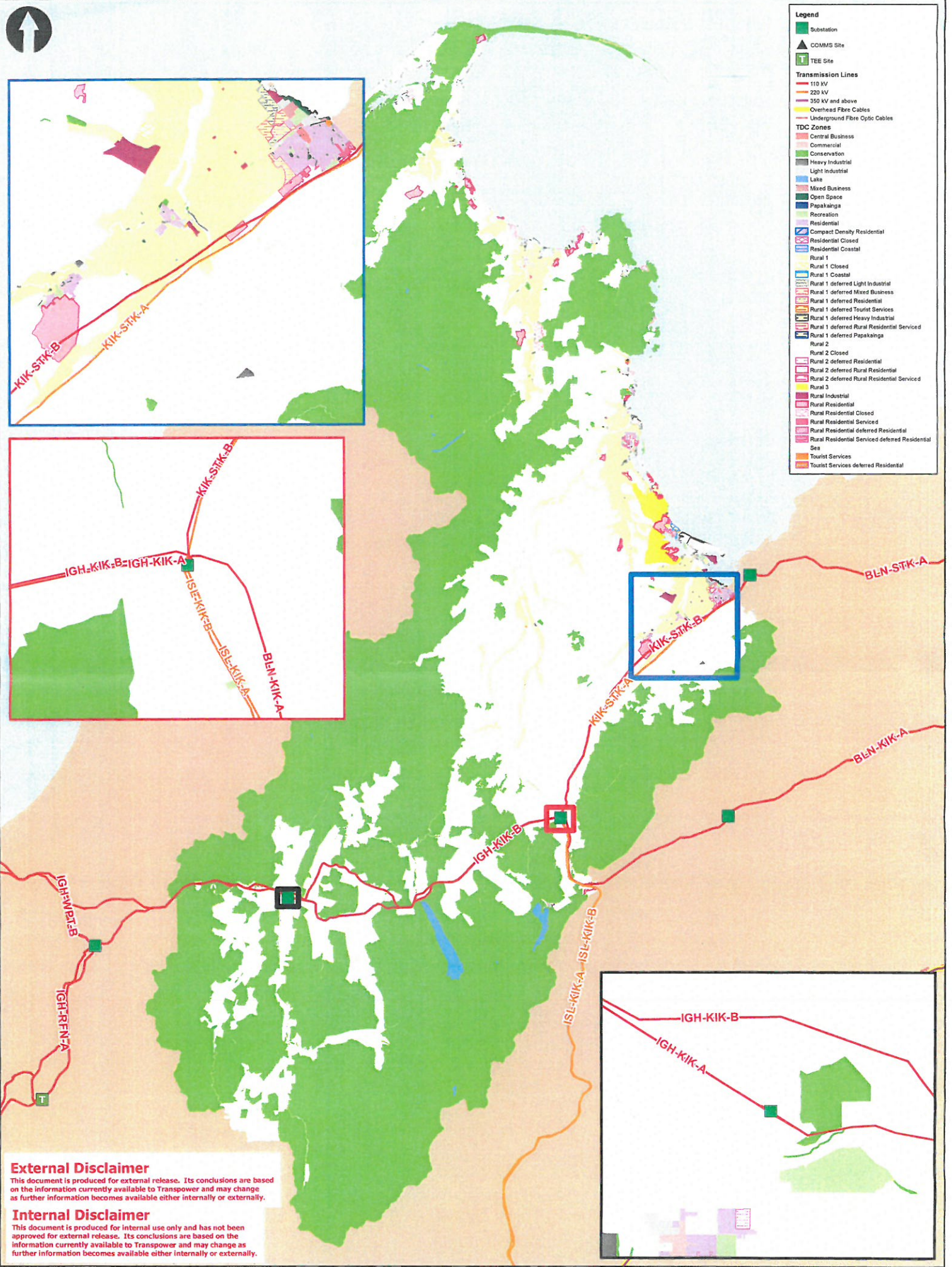
Environmental Planner

Transpower New Zealand Limited

Attachments

Attachment 1: Map of National Grid Assets in Tasman District

Attachment 2: Proposed Amendments to Plan Change 60 Provisions



Legend

- Substation
- COMMS Site
- TEE Site
- Transmission Lines
 - 110 kV
 - 220 kV
 - 350 kV and above
 - Overhead Fibre Cables
 - Underground Fibre Optic Cables
- TDC Zones
 - Central Business
 - Commercial
 - Conservation
 - Heavy Industrial
 - Light Industrial
 - Lake
 - Mixed Business
 - Open Spaces
 - Papakahoa
 - Recreation
 - Residential
 - Compact Density Residential
 - Residential Closed
 - Residential Coastal
 - Rural
 - Rural 1 Closed
 - Rural 1 Coastal
 - Rural 1 deferred Light Industrial
 - Rural 1 deferred Mixed Business
 - Rural 1 deferred Residential
 - Rural 1 deferred Tourist Services
 - Rural 1 deferred Heavy Industrial
 - Rural 1 deferred Rural Residential Serviced
 - Rural 1 deferred Papakahoa
 - Rural 2
 - Rural 2 Closed
 - Rural 2 deferred Residential
 - Rural 2 deferred Rural Residential
 - Rural 2 deferred Rural Residential Serviced
 - Rural 3
 - Rural Industrial
 - Rural Residential
 - Rural Residential Closed
 - Rural Residential deferred Residential
 - Rural Residential Serviced deferred Residential
 - Sea
 - Tourist Services
 - Tourist Services deferred Residential

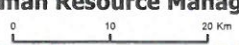
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**Notification of Change 60
 (Rural Land Use and Subdivision)
 to the Tasman Resource Management Plan**



Projection: NZTM 2000 Scale: 1:34,542 Plan Size: A3P



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Date: 24/02/2016 Drawn by: hurstg

Attachment 2

^{TWO} Appendix One – Submission Details

General Relief Sought


1. That PC60 is amended to ensure that (in the Rural Zones):
 - the NPSET 2008 is fully given effect to in the TRMP; (1)
 - the RPS is given effect to as it relates to the management of effects on the effective operation, maintenance and development of the National Grid; (2)
 - the National Grid (including transmission lines and substations) is protected from adverse effects (including reverse sensitivity effects) of subdivision, land use and development in proximity to electricity transmission infrastructure, including through the use of appropriate objectives, policies, rules and other methods (3)
2. Any other consequential amendments are made to the issues, objectives, policies, rules and other methods necessary to give effect to the relief sought in this submission. (4)

Guide to Annotated Provisions

Notified Plan change text shown in **Red underline or strikethrough**
 Transpower amendments shown as double underlined or ~~double strikethrough~~

Chapter 2: Meaning of Words

Provision	Submission & Reasons	Decision Requested
Submission 3: New defined term – National Grid	Transpower's submission seeks the inclusion of new policies, rules and methods to ensure the plan change gives effect to the NPSET. Providing a Plan definition for the term "National Grid" will assist the administration of the proposed policies, rules and methods and the TRMP generally.	Amend Chapter 2 of the TRMP by adding the following new term and definition: <u>National Grid - means the same as in the National Policy Statement on Electricity Transmission 2008.</u>
Submission 4: New defined term – National Grid Subdivision Corridor	Transpower's submission seeks the inclusion of new policies, rules and methods to ensure the plan change gives effect to the NPSET. Providing a Plan definition for the term "National Grid Subdivision Corridor" will assist the administration of the proposed policies, rules and	Amend Chapter 2 of the TRMP by adding the following new term and definition: <u>National Grid Subdivision Corridor - means the area measured</u>

Provision	Submission & Reasons	Decision Requested
	<p>methods and the TRMP generally.</p>	<p>either side of the centreline of above ground National Grid line as follows:</p> <ul style="list-style-type: none"> • 32m for the 110kV transmission lines • 37m for the 220kV transmission lines
<p>Submission 5: New defined term – National Grid Yard</p>	<p>Transpower's submission seeks the inclusion of new policies, rules and methods to ensure the plan change gives effect to the NPSET. Providing a Plan definition for the term "National Grid Yard" will assist the administration of the proposed policies, rules and methods and the TRMP generally.</p>	<p>Amend Chapter 2 of the TRMP by adding the following new term and definition:</p> <p><u>National Grid Yard (shown in red in diagram below) – means the area located 12 metres in any direction from the outer edge of a National Grid support structure.</u></p>  <p>LEGEND</p> <ul style="list-style-type: none"> — Centreline ● Single Pole ■ Pi Pole ■ Tower <p>Not to scale</p>
<p>Submission 6: New defined term – Sensitive activities</p>	<p>Transpower's submission seeks the inclusion of new objectives, policies, rules and methods to ensure the plan change gives effect to the NPSET. Providing a Plan definition for the term "Sensitive Activity" will assist the administration of the proposed policies, rules and methods and the TRMP generally.</p>	<p>Amend Chapter 2 of the TRMP by adding the following new term and definition:</p> <p><u>Sensitive activities – means residential activities, day care facilities, educational facilities, elderly persons housing, and hospitals.</u></p>

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Provision	Submission & Reasons	Decision Requested
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Chapter 7: Rural Environment Effects

Provision	Submission & Reasons	Decision Requested
<p>Submission 7: Amend Chapter 7 Introduction</p>	<p>Transpower considers that appropriate amendments are required to Chapter 7 (including to the chapter introduction) to implement the NPSET across the rural zone.</p>	<p>Amend Chapter 7 by addition the following text to 7.0 Introduction bullet point 3:</p> <ul style="list-style-type: none"> managing the effects of activities in rural areas, including cross boundary and reverse sensitivity effects, <u>effects on the National Grid</u>, and effects on rural character and amenity values (under Objectives 7.4.2 and 7.4.2A).
<p>Submission 8: New Issue, Objective, Policies and Methods</p>	<p>Transpower considers that issues, objectives and policies must be introduced to implement the NPSET across the rural zones. The intent of the additions proposed is to provide an appropriate framework for the avoidance, mitigation and management of effects of the National Grid through proposed rules and other methods.</p> <p>Transpower notes that the proposed amendments could be incorporated into existing provisions in Chapter 7; however, given that the proposed provisions apply across a different context than the existing provisions, it is considered that the simplest amendment is via a self-contained suite of provisions.</p>	<p>Amend Chapter 7 of the TRMP by adding the following new title, issues, objective, policies and methods:</p> <p><u>7.4A The National Grid in Rural Areas</u></p> <p><u>7.4A.1 Issue</u></p> <p><u>New subdivision, use and development could adversely affect the safe and efficient functioning of the National Grid.</u></p> <p><u>7.4A.2 Objective</u></p> <p><u>7.4A.2.1 Avoid the establishment of land use activities that could adversely affect (including through reverse sensitivity) the operation, maintenance, upgrading and development of the National Grid</u></p> <p><u>7.4A.3 Policy</u></p> <p><u>7.4A.3.1 To manage the effects of subdivision, development</u></p>

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Provision	Submission & Reasons	Decision Requested
		<p>and land use on the safe, effective and efficient operation, maintenance, upgrading and development of the National Grid by ensuring that:</p> <ul style="list-style-type: none"> (a) <u>areas are identified in the Plan to establish safe buffer distances for managing subdivision and land use development near the National Grid;</u> (b) <u>sensitive activities and large-scale structures are excluded from establishing within National Grid Yards and are appropriately managed around substations;</u> (c) <u>subdivision is managed around the National Grid to avoid subsequent land use from restricting the operation, maintenance, upgrading and development of the National Grid; and</u> (d) <u>changes to existing activities within a National Grid Yard and around National Grid substations do not further restrict the operation, maintenance, upgrading and development of the National Grid.</u> <p>7.4A.3.2 <u>To take into account the following when considering proposals for subdivision and development within the National Grid Corridor:</u></p> <ul style="list-style-type: none"> (a) <u>the extent to which the proposal may restrict or inhibit the operation, access, maintenance or upgrading of the National Grid;</u> (b) <u>any potential cumulative effects that may restrict the operation, access, maintenance, or upgrade of the National Grid; and</u> (c) <u>the nature of any proposal located near to an existing or planned National Grid infrastructure (including substations), and the potential for reverse sensitivity effects or adverse safety risks.</u> <p>7.4A.3.3 <u>To promote the design of subdivisions and land use development or redevelopment in a manner that enables the efficient use of land within the identified</u></p>

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Provision	Submission & Reasons	Decision Requested
		<p><u>National Grid Yard and around substations without introducing sensitive activities or structures that would inhibit the operation, access, maintenance, or upgrade of National Grid infrastructure.</u></p> <p>7.4A.20 Methods of Implementation</p> <p>7.4A.20.1 Regulatory</p> <p>(a) <u>Identification of the National Grid (transmission lines) on the Planning Maps.</u></p> <p>(b) <u>Rules to restrict new buildings, earthworks, sensitive activities and subdivision in proximity to the National Grid (high voltage transmission lines) through the use of setbacks and buffer areas.</u></p>

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Chapter 16.3: Subdivision

Provision	Submission & Reasons	Decision Requested
<p>Submission 9: 16.3.5.1 Controlled Subdivision (Rural 1 and Rural Coastal Zones).</p>	<p>Transpower considers the rule approach under PC60 for subdivision in the Rural 1 zone does not implement the NPSET.</p> <p>Presently, the only provisions applying in the Rural 1 Zone to manage potential effects of subdivision on electricity transmission infrastructure relate to the Richmond West Development Area (under controlled activity condition [o]). The infrastructure traversing this area was divested by Transpower in 2014 and as such the lines are now 'distribution lines,' and not 'transmission lines.'</p> <p>There are other parts of the District where existing National Grid transmission lines intercept the Rural 1</p>	<p>Add new controlled activity condition '(oo)' under Clause 16.3.5.1 as follows:</p> <p>Electricity Transmission Distribution Corridor</p> <p>(o) In the Richmond West Development Area, any land to be subdivided is located at least 12 metres from the centre of any electricity transmission <u>distribution</u> line as shown on the planning maps.</p> <p>National Grid Subdivision Corridor</p> <p>(oa) Any land to be subdivided is not within the <u>National Grid Subdivision Corridor</u></p>

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Provision	Submission & Reasons	Decision Requested
	<p>Zone; however, there are no conditions on subdivision in these areas to manage adverse effects of subdivision on the National Grid. In this respect, neither the operative Plan, nor PC60 give effect to the NPSET.</p> <p>Moreover, the existing controlled activity subdivision approach is not the most appropriate means of giving effect to the NPSET.</p> <p>Accordingly, amendments to Rule 16.3.5.1 are required. The relief sought is to include a new controlled activity standard for subdivision in the Rural 1 Zone outside the Richmond West Development Area; however, alternative drafting solutions may be appropriate to achieve the same environmental outcome.</p> <p>Transpower notes that the amendments proposed to the term "Electricity Transmission Corridor" to "Electricity Distribution Corridor" is a consequential amendment to provide differentiation between the National Grid and those distribution lines divested to Network Tasman.</p>	<p style="text-align: right;">12</p>
<p>Submission 10: New Restricted Discretionary Subdivision Rule 16.3.5.2 (Rural 1 Zone – Richmond West)</p>	<p>Consistent with the submission above, Transpower considers that controlled activity status for subdivision of land within the National Grid Subdivision Corridor does not give effect to the NPSET.</p> <p>Accordingly, a new restricted discretionary rule is proposed, subject to any subdivision in the corridor nominating a building platform for principal buildings outside of the National Grid Yard.</p> <p>Transpower considers that a non-notification clause will result in the efficient implementation of this rule, whilst identification of Transpower as an affected party will ensure the NPSET is effectively implemented by future</p>	<p style="text-align: right;">13</p> <p>Add a new restricted discretionary rule 16.3.5.3B for subdivision of land within the National Grid Subdivision Corridor as follows:</p> <p><u>16.3.5.3B Restricted Discretionary Subdivision (Rural 1 Zone – National Grid Subdivision Corridor)</u></p> <p><u>Subdivision in the Rural 1 Zone that does not comply with condition (a) of rule 16.3.5.1 is a restricted discretionary activity, if it meets the following condition:</u></p> <p>(a) <u>All allotments shall identify a building platform for the principal building and any other building for a sensitive activity, to be located outside the National Grid Yard.</u></p>

Provision	Submission & Reasons	Decision Requested
	<p>applications.</p>	<p><u>A resource consent is required. Consent may be refused or conditions imposed, only in respect of the following matters to which Council has restricted its discretion:</u></p> <ol style="list-style-type: none"> <u>(1) any impacts on the operation, maintenance, upgrade and development of the National Grid;</u> <u>(2) the ability of future development to comply with NZECP34:2001;</u> <u>(3) technical details of the characteristics and risks on and from the National Grid infrastructure;</u> <u>(4) the ability of the applicant to provide a complying building platform;</u> <u>(5) the location, design and use of any proposed building platform or structure as it relates to the National Grid transmission line(s);</u> <u>(6) the risk of electrical hazards affecting public or individual safety, and the risk of property damage; and</u> <u>(7) the nature and location of any vegetation to be planted in the vicinity of National Grid Lines.</u> <p><u>Notification Criteria</u></p> <p><u>In respect of any application made pursuant to this rule, the application will be decided without public notification, unless special circumstances exist.</u></p> <p><u>Transpower New Zealand Ltd shall be considered an affected party, unless written approval is provided by it.</u></p>
<p>Submission 11: Proposed Non-complying Subdivision Rule 16.3.5.5A</p>	<p>Consistent with the previous submission points above, Transpower considers that subdivision within the National Grid Corridor that does not identify building platforms for principal buildings or other buildings for sensitive activities is (generally) contrary to the aim of the NPSET (particularly Policies 10 and 11 of the NPSET).</p>	<p>Amend proposed non-complying subdivision Rule 16.3.5.5A as follows:</p> <p><u>16.3.5.5A Non-Complying Subdivision</u></p>