



TRANSPOWER

Keeping the energy flowing

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Kāpiti Coast District Council
Proposed Plan Change 1L Consultation
By email c/- district.planning@kapiticoast.govt.nz

Submission on Proposed Plan Change 1L Open Space zoning of Council-owned sites

This is a submission by Transpower New Zealand Limited (“Transpower”) on proposed Plan Change 1L in relation to two proposed sites, being Albizia Grove and Ngārara Road, to be re-zoned to Open Space. Both sites are traversed by the same National Grid Transmission Line, the Bunnythorpe - Haywards A (BPE-HAY-A) 220 kV overhead single circuit transmission line on steel towers. The information on the Council website and in the accompanying documentation indicate that no changes are proposed to the wording of the objectives, policies, or rules in the District Plan, it is only the planning maps that will be altered.

It is acknowledged that these are Council owned sites and that they are effectively already used for open space reserve purposes. However, two of the 16 sites proposed to be re-zoned contain or are traversed by National Grid assets. As such, Transpower is interested in how the re-zoning may impact on the National Grid. It is noted that no wording changes are proposed to the District Plan and the Section 32 report states (pages 11 and 13) that;

*... will not affect the ability of national grid infrastructure to be maintained or operated, nor will it affect any provisions relevant to the management of effects associated with the national grid. And
The rezoning is not expected to create any incompatibility with operation and maintenance of the national grid.*

Transpower acknowledges the above statements, however notes that the wording is ‘not expected to create any incompatibility’ provides a degree of uncertainty. Transpower would like confirmation that there will be **no** impact on the function of the National Grid and the ability to operate, maintain, develop and upgrade the network as a result of the re-zoning of the sites.

Albizia Grove Site

The new open space reserve area is centrally located, without direct access to Park Avenue. The BPE-HAY A transmission line crosses over the site, with a transmission tower just to the south of the new reserve area. On the Transpower map image only the centre line of the Transmission Line is shown (in yellow) – there will be conductors on both sides of the identified centre line.



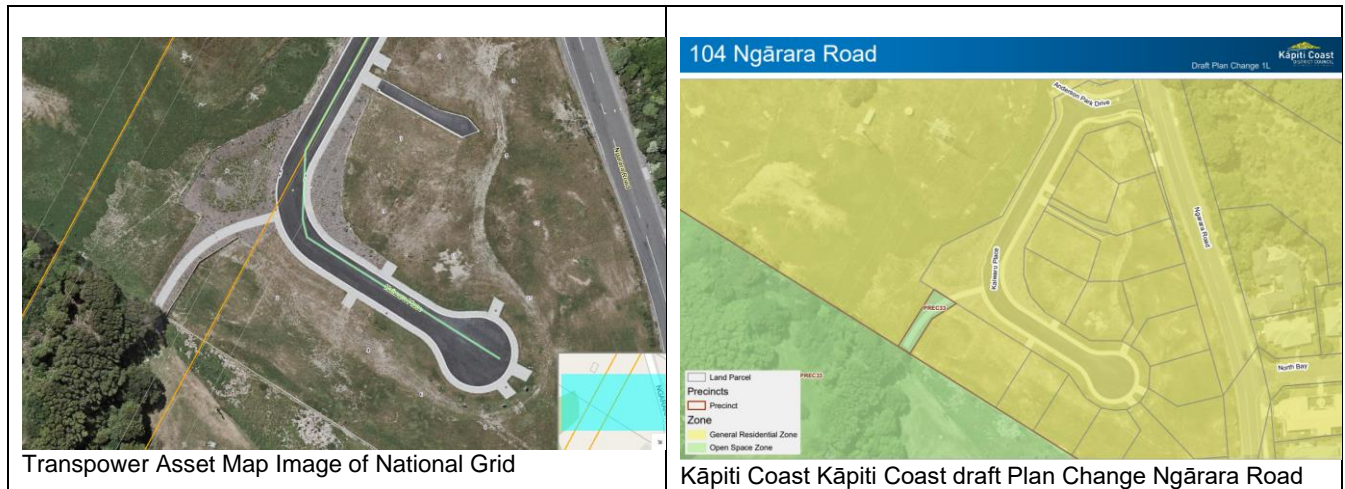
Transpower Asset Map Image of National Grid



Kāpiti Coast Kāpiti Coast draft Plan Change Albizia Grove

Ngārara Road Site

The new open space reserve area provides formed access to the adjacent reserve. The BPE-HAY A transmission line crosses over the site. It is noted that it is the outer conductor that is over the site. There are no towers or poles on this site.



Transpower and the National Grid

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand’s high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. The National Grid connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses. The National Grid is critically important, and nationally significant, infrastructure that is necessary for a reliable and secure supply of electricity throughout the country and that, in turn, supports national and regional growth.

The National Grid extends from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 kilometres of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower’s role and function is determined by the State-Owned Enterprises Act 1986, the company’s Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions. 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. A key part of this is connecting new renewable energy generation to the National Grid – Transpower expects demand for electricity to increase over time as New Zealand transitions to a zero-carbon economy, and Transpower is uniquely placed to help enable that transition.

The need to operate, maintain, upgrade and develop the National Grid is a matter of national significance that is recognised in an RMA context by the National Policy Statement on Electricity Transmission 2008 (“NPSET”). In the context of Kāpiti Coast District, the NPSET has been given effect to in the District Plan (particularly within Part 2 District-Wide Matters Infrastructure). It is noted that no changes are proposed to the existing provisions in the District Plan, just the planning maps.

Transpower’s Submission

Transpower is grateful to have the opportunity to provide a submission on proposed Plan Change 1L Open Space zoning of Council-owned sites. Transpower supports the principle of the re-zoning. However, under the NPSET it is a matter of national significance that the operation, maintenance, upgrading and development of the National Grid is protected. Any changes to the zoning close to the National Grid needs to be carefully considered being mindful of any unintended consequences of the changes in zoning.

Transpower requests that confirmation is provided that there will be **no** implications of changing the zone that apply to the National Grid for these two sites. Proactive management through appropriate planning provisions such as zoning and rules for the National Grid corridor is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid and gives effect to the NPSET.

Transpower welcomes that opportunity to be involved further in the process.

Yours faithfully

TRANSPOWER NZ LTD

A handwritten signature in blue ink, appearing to read 'Trudi Burney', is positioned above the printed name and title.

Trudi Burney
Senior Environmental Planner

Resource Management (Forms, Fees, and Procedure) Regulations
2003
Form 5

Submission on notified proposal for plan change

Clause 6 of Schedule 1, Resource Management Act 1991

To: Kāpiti Coast District Council

Name of submitter: Transpower New Zealand Limited
[full name]

This is a submission on the following change proposed to the Operative Kapiti Coast District Plan 2021 (the proposal): [name of plan change]

Plan Change 1L

Trade Competition

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

[*Select one]

*I am/am not** 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 effects of trade competition.

[*Delete entire paragraph if you could not gain an advantage in trade competition through this submission]

[**Select one]

The specific provisions of the proposal that my submission relates to are: [give details]

Please refer to letter

My submission is: [include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

Please refer to letter

Contact Details

Electronic address for service of submitter: environment.policy@transpower.co.nz

Telephone: 03 590 7126

Postal address (or alternative method of service under section 352 of the Resource

Management Act 1991): 31 Gilberthorpes Road, Islington 8042 Christchurch

Contact person: Trudi Burney, Senior Environmental Planner

[name and designation, if applicable]

Note to person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.