

Submission by Transpower New Zealand Ltd on Plan Change 6 to the Hamilton City District Plan

September 2019

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TRANSPOWER

**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED
ON PROPOSED PLAN CHANGE 6 TO THE HAMILTON CITY DISTRICT PLAN**

To:

Plan Change 6 Submissions
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The specific provisions of the proposed plan change that the submission relates to are:

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



Signature of submitter
[or person authorised to sign on behalf of the submitter.]

Date: 2 September 2019

SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON PROPOSED PLAN CHANGE 6 TO THE HAMILTON CITY OPERATIVE DISTRICT PLAN

Overview

This is a submission made by Transpower New Zealand Limited (“**Transpower**”) on Proposed Plan Change 6 (“**PC6**”) to the operative Hamilton City District Plan 2017.

This submission seeks to ensure PC6 appropriately recognises and provides for the National Grid. Specifically, from Transpower’s perspective, the provisions of PC6 need to ensure that it:

- Gives effect to the National Policy Statement on Electricity Transmission 2008 (“**NPSET**” or “**NPS**”);
- Recognises the need to sustainably manage the National Grid as a physical resource of national significance;
- Recognises the benefits of the National Grid at local, regional and national levels; and
- Provides for the effective operation, maintenance, upgrading and development of the National Grid.

In general, PC6 is supported by Transpower; particularly, the proposed changes to correct mapping errors in relation to the National Grid Yard and National Grid Corridor shown in the operative District Plan. The District Plan is required to appropriately recognise and provide for the National Grid consistent with the National Policy Statement on Electricity Transmission (NPSET) which, amongst other matters, requires district plans to identify transmission lines on planning maps.

It is understood that the proposed map changes are to ensure that the District Plan maps reflect updated National Grid data provided to Council by Transpower. This was an update to April 2011 data that was provided to Council and used to map the National Grid in the Proposed District Plan (PDP). No changes were made to the plan maps in relation to the National Grid during the PDP submissions and hearings process, meaning that the PDP maps continued to use the outdated 2011 data. Subsequently, and as a result of the proposed development in Tramway Road, Council has found that the National Grid and National Grid Corridor are incorrectly mapped in the (now operative) District Plan. It is understood that the corrections proposed to the Transmission Corridor shown on the plan maps forming part of PC6 align with the existing District Plan definition for ‘National Grid Corridor’ and ‘National Grid Yard’ and do not alter the physical location of the existing Transmission Lines.

Transpower supports the proposed map changes which provide for more accurate mapping of the Electricity Transmission Corridors (which includes Transmission Structures, Electricity Transmission Lines, National Grid Yard and National Grid Corridor). These mapping amendments will ensure that the District Plan is in accordance with the NPSET. It is noted the mapping corrections do not alter the National Grid provisions within the District Plan, rather are a minor amendment in terms of the location of the Electricity Transmission Corridors as identified on the District Plan planning maps.

Transpower notes Appendix 8 of the Section 32 Evaluation Report contains four plans which show the extent of change to the Electricity Transmission Corridors (which includes Transmission Structures, Electricity Transmission Lines, National Grid Yard and National Grid Corridor) at a larger scale for information purposes. Transpower understands the corrections relate to all the maps which form part of the Proposed Plan Change and identified within Appendix 17, and not only those contained within Appendix 8 to the Section 32 Evaluation.

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 generators directly to distribution companies and major industrial users, feeding electricity to the local networks that distribute electricity to homes and businesses. 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 12,000 km of transmission lines and 166 substations, supported by a telecommunications network of some 300 telecommunication sites, which 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's Statement of Corporate Intent for July 2019 to July 2022, states that:

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

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

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It has to be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient district plan where it may affect the National Grid, including possible future changes.

Hamilton City Transmission Assets

Transpower has a number of overhead and underground transmission line, substation and telecommunications assets within Hamilton City, comprising the following:

- Arapuni - Hamilton A 110kV transmission line (ARI-HAM-A)
- Arapuni - Hamilton B 110kV transmission line (ARI-HAM-B)
- Hamilton - Karapiro A 110kV transmission line (HAM-KPO-A)
- Hamilton - Waihou A 110kV transmission line (HAM-WHU-A)
- Hamilton Meremere B2 Cable Section 110kV transmission line (HAM-MER-B2-CBL-Z)
- Hamilton Meremere B1 Cable Section 110kV transmission line (HAM-MER-B1-CBL-Z)
- Hamilton - Meremere B 110kV transmission line (HAM-MER-B)
- Hamilton - Meremere A 110kV transmission line (HAM-MER-A)
- HAM-MER-A Cable Section 110kV transmission line (HAM-MER-A-CBL)

- Hamilton - Deviation A 220kV Transmission line (HAM-DEV-A)

The above lines are a mixture of towners, poles and underground cables.

Also included in the city is the Hamilton Substation.

Specific Comments

Transpower is broadly supportive of PC6. In particular, Transpower supports the proposed changes to correct mapping errors in relation to the Electricity Transmission Corridors. The District Plan is required to appropriately recognise and provide for the National Grid consistent with the National Policy Statement on Electricity Transmission (NPSET) which, amongst other matters, requires district plans to identify transmission lines on planning maps.

Transpower also supports the amendments proposed to Rule 4.4.5 (Height in Relation to Boundary) clause c) ii) which exempts the National Grid Corridor from the height control plan as this provides consistency with the National Grid provisions contained within Chapter 25.7 of the plan.

Specific comments are included in the table below and for the avoidance of doubt, include any consequential relief to the specific relief sought. Amendments suggested through this submission are shown as red underlined or strikethrough text.

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
Chapter 4: Residential Zones			
<p>4.4.5 Height in Relation to Boundary</p> <p>...</p> <p>c) The following exemptions apply to Rule 4.4.5(a):</p> <p>...</p> <p>ii. An aerial as permitted in Volume 1, Chapter 25.7 City-wide – Network Utilities and the Electricity National Grid Corridor may protrude through the height control plan; and ...</p>	Support	<p>Transpower supports the amendments proposed to Rule 4.4.5 (Height in Relation to Boundary) clause c) ii) which exempts National Grid Corridor protrusions from the height control plane. This proposed provision provides consistency with the National Grid provisions contained within Chapter 25.7 (Network Utilities and the Electricity National Grid Corridor) of the plan and Transpower supports the requirement to comply with the provisions in Chapter 25.7.</p>	<p>Retain Rule 4.4.5 c) ii) as proposed but correct the minor wording error as follows:</p> <p>ii. An aerial as permitted in Volume 1, Chapter 25.7 City-wide – Network Utilities and the Electricity National Grid Corridor may protrude through the height control plane; and ...</p>
Chapter 25: City-wide			
<p>25.2.4 Rules – General Standards</p> <p>25.2.4.1 Earthworks in All Zones</p> <p>...</p> <p>g) Earthworks must not cause malfunction or result in damage to network utilities, or change the cover over network utilities so as to create the potential for damage or malfunction.</p> <p>...</p>	Neutral	<p>Whilst not directly relevant to earthworks within the National Grid Yard (provided for in 25.2.4.2), Transpower notes the amendment to add a specific rule provision under 25.2.4.1 g) to ensure that earthworks in all zones do not cause malfunction or damage to network utilities or create the potential for damage or malfunction.</p>	<p>Retain Rule 25.2.4.1 clause g) as proposed on the basis that there are no changes proposed to Rule 25.2.4.2 (Earthworks within any National Grid Yard).</p>
Appendix 17 - Planning Maps			
<p>Plan Maps:</p> <p>Map 4B and A</p> <p>Map 10B and A</p> <p>Map 29B and A</p> <p>Map 38B and A</p> <p>Map 48B and A</p>	Support	<p>Transpower supports the proposed changes to correct mapping errors in relation to the Electricity Transmission Corridors (which includes Transmission Structures, Electricity Transmission Lines, National Grid Yard and National Grid Corridor). The District Plan is required to appropriately recognise and provide for the National Grid consistent with</p>	<p>Retain the planning maps within Appendix 17 of Proposed Plan Change 6 (specifically Maps 4A and B, 10A and B, 29A and B, 38A and B and 48A and B), as notified which show the amended location of the Electricity Transmission Corridors (which includes Transmission Structures, Electricity</p>

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
		<p>the National Policy Statement on Electricity Transmission (NPSET) which, amongst other matters, requires district plans to identify transmission lines on planning maps.</p> <p>In respect of the maps included within Appendix 8 to the Section 32 Evaluation, it appears they do not show the extent of all the minor location changes. It is also noted the first map within Appendix 8 shows the Electricity Transmission Corridor extending north of Radiata Street whereas the corridor beyond the urban edge is underground.</p>	<p>Transmission Lines, National Grid Yard and National Grid Corridor).</p> <p>Confirmation is sought from Council the maps shown in Appendix 8 to the Section 32 Evaluation do not show the full changes and instead the maps within Appendix 17 of the Proposed Plan Change are to be relied on.</p>

