

*Daniel Hamilton
Tel: 0
Email:*

30 November 2018

Greater Christchurch Partnership
PO Box 73012
Christchurch 8154

Delivered via email to: ourspace@greaterchristchurch.org.nz

To whom it may concern,

TRANSPOWER FEEDBACK ON 'OUR SPACE 2018-2048: Greater Christchurch Settlement Pattern Update

Transpower New Zealand Limited (Transpower) appreciates the opportunity to make a submission on the Greater Christchurch Settlement Pattern Update. Transpower understands that there is a critical need to ensure sufficient developable land is available to meet housing and business demand in accordance with the National Policy Statement on Urban Development Capacity 2016 (NPSUDC).

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 comprises some 12,000 km of transmission lines and around 170 substations. There are a number of Transpower's high voltage transmission lines and substations within the Greater Christchurch area.

National Significance of the National Grid

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 2008 (NPSET) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA).

NPSET Section 4 sets out that "*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.*"

The objective of the NPSET is:

“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 recognises that unrestricted housing development under and near to the National Grid, can constrain the operation, maintenance, upgrade and development of the National Grid. Policy 11 of the NPSET protects the National Grid by requiring a buffer corridor within which it can be expected that housing (and other sensitive activities) will generally not be provided for in plans and/or given resource consent. Policy 10 of the NPSET requires decision-makers, to the extent reasonably possible, to manage activities to avoid reverse sensitivity effects on the National Grid and to ensure that operation, maintenance, upgrading and development of the National Grid is not compromised.

The rationale for these NPSET policies is that where housing is located too close to National Grid support structures, lines and substations it creates safety hazards, restricts Transpower’s access for maintenance, upgrade and emergency repair work, and creates or contributes to reverse sensitivity impacts (for example where occupants complain about the noise of a line or substation or their visual effects).

Local authorities have been giving effect to the NPSET in their regional policy statements and regional and district plans since 2008. Environment Canterbury’s Regional Policy Statement 2013 and the Christchurch City Council’s Replacement District Plan have given effect to the NPSET. The Selwyn and Waimakariri District Plans have not yet given effect to the NPSET but both councils have been engaging constructively with Transpower as they work on their next generation district plans.

Despite the fact that the National Grid is infrastructure of national significance and recognised as such in the NPSET, the NPSUDC does not explicitly require local authorities to give effect to Policies 10 and 11 of the NPSET when releasing constraints on housing. However, Policy PB3(a) of the NPSUDC states:

“The assessment under policy PB1 shall estimate the sufficiency of development capacity provided by the relevant local authority plans and proposed and operative regional policy statements, and Long-Term Plans and Infrastructure Strategies prepared under the Local Government Act 2002, including:

(a) *the cumulative effect of all zoning, objectives, policies, rules and overlays and existing designations in plans, and the effect this will have on opportunities for development being taken up.”*

In this instance, the proposed future development areas are subject to provisions in the Canterbury Regional Policy Statement and district plans that directly affect the opportunities for development being taken up, in the form of the (existing and future) National Grid corridor provisions. The extent to which the requirements of Policy PB3(a) have been executed is not clear from the information contained in the Greater Christchurch Settlement Pattern Update document. Transpower’s submission draws the Greater Christchurch Partnership’s attention to this matter for its strategic planning and recommends changes to the text which confirm that the National Grid has been taken in to account as part of housing capacity assessments.

Transpower wishes to stress that it does not want to prevent development from occurring – but simply seeks that the assessments confirm and demonstrate that the National Grid has been taken in to account under Policy PB3(a). This will ultimately enable development that is designed in a way that takes the National Grid transmission lines, cable and substations in to account. There are numerous ways in which development can occur near transmission lines appropriately and safely and without compromising Transpower’s requirements. Subdivision offers an opportunity to design a development to provide the buffer corridor required by the NPSET, and also to ensure allotments are of a sufficient size and alignment to allow buildings to be safely constructed. Failing to take the lines into account at appropriate stages can increase development costs, with redesign being necessary.

Transpower seeks the following changes to Our Space 2018-2048:

Specific relief sought		
Section / page	Relief	Reason
General comment	Update the document to acknowledge whether (or not) the requirements of Policy PB3(a) of the NPSUDC have been completed.	There are National Grid corridor provisions in the Christchurch Replacement District Plan, and Transpower is working closely with Waimakariri and Selwyn District Councils in relation to National Grid corridor provisions as those councils work towards their next generation district plan.

Specific relief sought		
Section / page	Relief	Reason
4. Our Challenges 4.1 Key growth issues for Greater Christchurch	Update to include the need to for urban growth and transport planning to be carefully integrated with infrastructure.	Figure 3 (on page 5) says infrastructure must be comprehensively integrated with land use planning, but the key growth issues for Greater Christchurch (pages 15 and 16) do not mention anything about the need for urban growth to be integrated with critical infrastructure, such as the National Grid.
Whole document	Update the maps in the document to show the location of the National Grid transmission lines and substations.	None of the maps in the document include the National Grid transmission lines or substations. Given that these are nationally significant assets (as recognised by the NPSET) and development in the vicinity of them must be carefully planned and managed, they should be included in the maps.

Should you require clarification of any matter, please contact me (03 590 6926) or via email daniel.hamilton@transpower.co.nz

Yours faithfully,



Daniel Hamilton
Environmental Regulatory Team Leader