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Upper Hutt City Council
 Private Bag 907
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 Via email: planning@uhcc.govt.nz

Dear Sir/Madam

HEARING REPORT: PROPOSED PLAN CHANGE 42: MANGAROA AND PINEHAVEN FLOOD HAZARD EXTENTS

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| Submitter Reference: Transpower NZ Ltd (24) |
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Transpower New Zealand Ltd (“**Transpower**”) is the state-owned enterprise that owns and operates the National Grid – the transmission network – that carries high voltage electricity around the country. It connects power stations owned by generating companies to substations feeding the local networks that distribute electricity to homes and businesses, with some intensive electricity users directly connecting to the National Grid. The National Grid comprises towers, poles, lines, cables and substations, and stretches and connects the length and breadth of the country; with two national control centres (in Hamilton and Wellington). The National Grid is supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that comprise the National Grid.

The following National Grid assets are within or traverse the Upper Hutt district boundaries:

- Bunnythorpe – Haywards A (BPE-HAY A) 220kV single circuit line on towers;
- Bunnythorpe – Haywards B (BPE-HAY B) 220kV single circuit line on towers;
- Haywards – Upper Hutt A (HAY-UHT A) 110kV double circuit line on towers;
- Masterton – Upper Hutt A (MST-UHT A) 110kV double circuit line on towers;
- Bunnythorpe – Wilton A (BPW-WIL A) 220kV double circuit line on towers;
- Gracefield – Haywards A (GFD HAY A) 110kV single circuit line on towers;
- Mount Climie (MCL) communications site;
- Upper Hutt Substation (UHT) (Akatarawa Road);
- Haywards – Upper Hutt (HAY_UHT_Trunk) underground fibre optic cables; and
- Masterton – Upper Hutt (MST_UHT_Trunk) underground fibre optic cables.

While Transpower has no existing assets within the flood extent areas identified and subject to PC42, its interests in the proposed plan change is to ensure the proposed plan change recognises and provides for any new National Grid Infrastructure that is required to be located in the flood areas. Such recognition would be consistent with the National Policy Statement for Electricity Transmission 2008 (“NPSET”) in particular Policy 3 which acknowledges the National Grid is subject to technical and operational requirements and these include locational constraints.

Section 42A Officers Report Recommendations and Transpower’s Response

The following comments are specific to the recommendations on submission points sought by Transpower. For ease of reference, the submission points on specific plan provisions are grouped as assessed in the S42A Report.

Recommendations supported

Policies 14.4.4, 16.4.18 and 16.4.19

UHCC s.42A Report: Page 23, paragraph 116

In its submission Transpower supported the retention of these provisions as currently drafted. The officer recommendation to accept this submission is supported, noting that the wording of some of these provisions has been amended in response to other submissions received.

Objective 16.2.1

UHCC s.42A Report: Page 33, paragraph 207

In its submission Transpower sought a minor wording change to clarify the intent of this objective and give reference to new network utilities. The proposed amendment to the wording recommended by the officer is supported and addresses Transpower’s concerns.

Definition – Network Utilities Structure

UHCC s.42A Report: Page 35, paragraph 220

Transpower notes the unintended omission of a definition of Network Utilities Structure in the notified definitions chapter and supports the officer recommendation that this term be reinserted in the plan.

Objectives 14.3.2, 16.3.4 and 16.3.5 and Policy 14.4.3

UHCC s.42A Report: Page 37, paragraphs 235 and 236

UHCC s.42A Report: Page 41, paragraph 262

Transpower supports the officer’s recommendation to amend the wording of Objective 16.3.5 as it achieves the outcomes sought in its submission to recognise new network utilities, and clarifies that Chapters 16 and 30 prevail over Chapters 14 and 33 in relation to the development and operation of new network facilities in flood hazard extents.

Table 23.1 – Earthworks within the Pinehaven Flood Hazard Extent and Mangaroa Flood Hazard Area

UHCC s.42A Report: Page 47, paragraph 294

In its submission Transpower sought clarification that the earthworks rules in the table are not applicable to network utilities or alternatively, if they do apply, that

the activity status is altered to restricted discretionary or discretionary. Although the officer's recommendation is to reject this submission Transpower accepts the recommendation based on the wider policy framework that applies to network utilities, coupled with the fact that the proposed non-complying activity status relates solely to the Stream/River Corridor, or earthworks are otherwise provided for in the road corridor. In particular, Transpower notes that earthworks associated with network utilities outside this corridor would be treated as either a restricted discretionary or discretionary activity.

Rule 30.8a

UHCC s.42A Report: Page 49, paragraph 305

Transpower supports the officer recommendation on the basis that it does not apply to assets that it owns and operates, and that the proposed wording does not imply or create an expectation that its services will be undergrounded.

Rule 30.13a

UHCC s.42A Report: Page 50, paragraph 313

In its submission Transpower sought, as a matter of discretion, more explicit consideration of the benefits associated with locating local, regional or national network utilities in particular locations. Transpower considers that the wording in the officer's recommendation achieves this and supports the amendment proposed.

Table 33.1

UHCC s.42A Report: Page 52, paragraph 321

Transpower supports the officer's recommendation to include an explanatory note at the bottom of Table 33.1 along with the proposed wording of the note. It considers that this amendment achieves the outcome sought in its submission, and clarifies that Chapters 16 and 30 prevail over Chapters 14 and 33 in relation to the development and operation of new network facilities in flood hazard extents.

Hearing Appearance

Given the support given to the relevant officer recommendations relating to Proposed Plan Change 42, Transpower does not propose to present evidence on these matters at the hearing. However, if the Hearings Panel consider that it useful for Transpower to appear before it to explain and answer any questions on the above we would be more than happy to do so.

Transpower requests this letter be tabled at the hearing in support of its submission points and the Section 42A Report recommendations as outlined above.

Transpower wish to express its appreciation of the collaborative process adopted by the council planners in discussing and addressing the matters raised in Transpower's submission.

Should you require clarification of any matter, please contact Rebecca Eng at Transpower (09 590 7072), or on the following email: Rebecca.Eng@transpower.co.nz

Yours faithfully

A handwritten signature in blue ink, appearing to read 'RENG'. The signature is stylized and cursive.

Rebecca Eng
Senior Environmental Planner