

Submission # 27

The specific provisions of the proposal that my submission relates to are:

Page No	Reference (Issue, Objective, Policy, or Method)	Support/Oppose	Decision Sought What changes you would like to see	Give Reasons
			Please see separate submission letter	

Submission by Transpower NZ Limited on the Proposed Change 6 to NPS-DC to the Bay of Plenty Regional Policy Statement

6 September 2022

Keeping the energy flowing



Submission by Transpower New Zealand Ltd on Proposed Change 6 (NPS-UD) to the Bay of Plenty RPS

To **Proposed Change 6 (NPS-UD) to the RPS**
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Submission by Transpower New Zealand Limited on Proposed Change 6 (NPS-UD) to the Bay of Plenty RPS

Overview

Transpower New Zealand Ltd (“**Transpower**”) welcomes the opportunity to provide a submission on Proposed Change 6 NPS-UD (“**Proposed Change 6**”).

These comments have been prepared to assist the Council in ensuring the planning framework under Proposed Change 6 appropriately recognises and provides for the National Grid. Specifically, from Transpower’s perspective, the provisions of Proposed Change 6 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.

Within these comments, Transpower provides an overview of Transpower and its role and function, an overview of the National Grid assets within the Bay of Plenty Regional Council area, an overview of the statutory framework as it relates to the National Grid, the key issues for Transpower, and specific comments on Proposed Change 6 provisions on which the Bay of Plenty Regional Council (“**the Council**”) is seeking submissions.

Transpower’s Role and Function

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand’s National Grid, the high voltage 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 Paihia 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 11,000 km of transmission lines and 170 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 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 ensure 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. The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation. Transpower also directly connects electricity to some large industrial users.

Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient regional policy framework where it may affect the National Grid, including possible future changes.

Bay of Plenty Area Transmission Assets

Transpower's assets within and traversing the Bay of Plenty area comprise the following:

- Rapuni - Edgecumbe RI-EDG-110kV Transmissions lines on Single Circuit Pi Pole
- Rapuni - Edgecumbe B RI-EDG-B-110kV Transmissions lines on Single Circuit Pi Pole
- Tiamuri - Taruenga TI-TR-220kV Transmissions lines on Double Circuit Steel Tower
- Edgecumbe - Taruenga EDG-TR-220kV Transmissions lines on Double Circuit Steel Tower
- Hairini - Mt Maunganui HI-MTM-110kV Transmissions lines on Single Circuit Pi Pole
- Hairini - Mt Maunganui B HI-MTM-B-110kV Transmissions lines on Single Circuit Single Pole
- HI-MTM-B1 Cable Section HI-MTM-B1-CBL
- Hairini - Te Matai HI-TMI-110kV Transmissions lines on Single Circuit Single Pole
- Kawerau - Deviation W-DEV-220kV Transmissions lines on Double Circuit Steel Tower
- Ohauri - Edgecumbe OH-EDG-220kV Transmissions lines on Single Circuit Steel Tower
- Oere - Te Matai OE-TMI-110kV Transmissions lines on Single Circuit Pi Pole
- Owhata - Deviation OWH-DEV-110kV Transmissions lines on Double Circuit Steel Tower
- Taruenga - Deviation TR-DEV-110kV Transmissions lines on Double Circuit Steel Tower
- Taruenga - Deviation B TR-DEV-B-110kV Transmissions lines on Double Circuit Steel Tower
- Wairarua - Whirinaki WR-WHI-220kV Transmissions lines on Double Circuit Steel Tower
- Edgecumbe - Kawerau EDG-W-110kV Transmission lines on Single Circuit Pi Pole
- Edgecumbe - Kawerau B EDG-W-B-110kV Transmissions lines on Single Circuit Pi Pole
- Hairini - Tauranga HI-TG-W-110kV Transmissions lines on Double Circuit Steel Tower
- Hairini - Taruenga HI-TR-220kV Transmissions lines on double Circuit Steel Tower
- Rotorua - Taruenga ROT-TR-110kV Transmissions lines on Double Circuit Steel Tower
- Edgecumbe - Waiotahi B EDG-WAI-B-110kV Transmissions lines on Single Circuit Pi Pole
- Kawerau - Matahina W-MT-110kV Transmissions lines on Double Circuit Steel Tower

Note: the predominant line type is listed, however some lines are a mix of pole/tower types.

Edgecumbe, Kawerau, Waitimo, Matahina, Mt Maunganui, Oere, Owhata, Rotorua, Tauranga, Te Matai, Taruenga and Waiotaha substations with Matahina Lookout Communications and Poie Tee.

Attached as **Appendix 1** is a map of Transpower's assets within the Bay of Plenty area.

Statutory Framework

The National Grid is nationally and regionally significant infrastructure that is recognised in the RMA context by the National Policy Statement for Electricity Transmission and the Resource Management National Environmental Standards for Electricity Transmission Activities Regulations.

National Policy Statement on Electricity Transmission

The National Policy Statement for Electricity Transmission 2008 (“NPSET”) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to recognise the benefits of transmission, the effects of the National Grid and the need to appropriately manage activities and development close to the Grid. The NPSET only applies to the National Grid (the assets used or operated by Transpower).

The one single objective of the NPSET is as follows:

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.*

The NPSET policies give direction on how to achieve the objective, providing for the recognition of the benefits of transmission as well as the environmental effects of transmission, and the management of adverse effects on the transmission network. As such, the NPSET policies impose obligations on decision makers and Transpower itself.

Policy 1 of the NPSET provides that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit reference is made to the benefits of security of supply, efficient transfer of energy, development and use of new electricity generation, and enhanced supply.

Policies 2 to 9 relate to management of the environmental effects of transmission. In particular, Policy 2 states:

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

Policies 3 to 5 contain matters which decision-makers must consider, including technical and operational constraints, the route, site and method selection process, and operational requirements. Policy 6 seeks to reduce the existing adverse effects of transmission infrastructure where appropriate and Policies 7 and 8 relate to urban and rural environments. Policy 8 requires new Grid assets to ‘seek to avoid’ sensitive rural environments (rather than fully avoid them). Policy 8 is as follows:

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

Policy 9 specifically relates to health standards. Policies 2 to 9 are relevant to Proposed Change 6 as they provide the policy framework for managing the environmental effects of transmission and see to ensure provision for the ongoing operation and development of the National Grid.

Policies 10 and 11 of the NPSET provide guidance on the management of adverse effects of other activities on the transmission network. Policies 13 and 14 relate to the long-term strategic planning of transmission assets. Under Policy 14, regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

Sections 55, 61 and 62 of the Resource Management Act 1991 (RMA) require the Council to ensure its regional policy statement is prepared and amended in accordance with and 'gives effect' to the objectives and policies of the NPSET. This is a strong statutory direction and requires the Proposed Change 6 provisions to reflect the direction and intent of the NPSET.

Key Issues and Approach Sought

These comments have been prepared to assist the Council in ensuring the policy framework under Proposed Change 6 appropriately recognises and provides for the National Grid.

As highlighted in the NPSET (being a higher-level policy document) the three significant resource management issues relating to the National Grid are:

- a) Enabling and providing for the ongoing operation, maintenance, upgrading and development of the National Grid,
- b) Managing the adverse effects of the ongoing operation, maintenance, upgrading and development of the National Grid, and
- c) Inappropriate development, land use and subdivision in proximity to the National Grid which can compromise its operation maintenance, development and upgrade.

Transpower generally supports Proposed Change 6. Transpower understands that under the National Policy Statement (Urban Development), the Regional Policy Statement (RPS) must recognise and be 'responsive to plan changes that add significantly to development capacity and contribute to well-functioning urban environments'.

While Transpower is generally supportive, some specific amendments are sought to ensure Proposed Change 6 appropriately recognises the National Grid and provides for its ongoing operation, maintenance, upgrade and development. Specifically, Transpower seeks clarification of the relationship between the new urban development provisions and the operative RPS provisions and seeks recognition of the National Grid in order to give effect to the NPSET. To support clarity, Transpower seeks amendments to the draft wording to include specific reference to the National Grid.

Transpower would be happy to expand on any other points within these comments or provide further details or supporting information if required.

Specific comments on Proposed Change 6 (NPS-UD)

The following table outlines Transpower's specific comments on the Proposed Change 6 provisions (dated September 2022)

Where specific wording amendments are sought by Transpower, these are shown as **yellow bold** text.

It should be noted that Transpower reserves its right to amend/re-define its position and comments on Proposed Change 6 provisions as the RPS change progresses through the RMA Schedule 1 process.

Proposed Change 6 Provision	Support / Oppose / Amend	Comments / Reasons	Outcome sought
Part Two – Resource management issues, objectives and summary of policies and methods to achieve the objectives of the Regional Policy Statement			
Policies			
<p>Policy UG 6A:</p> <p>Policy UG 7A</p> <p>Policy UG 22B: Te Tiriti o Waitangi Principles</p>	<p>Amend</p>	<p>Transpower supports the inclusion of a clear statement within the Proposed Change 6 provisions that provides clarity for RPS users. Such information provides clarity and assists the interpretation and implementation of the RPS.</p> <p>Transpower considers that specific reference and acknowledgment of the significance of the National Grid needs to be provided alongside some of these new provisions for avoidance of any doubt that the National Grid is nationally and regionally significant.</p> <p>The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed.</p> <p>To ensure clarity, Transpower would support specific reference within the Change 6 provisions to the National Grid. As an alternative, Transpower would support references to nationally and regionally significant infrastructure.</p>	<p>Policy UG 6A: Sequencing of Efficient use of land and infrastructure for urban growth and development – western Bay of Plenty sub-region Manage urban development within each identified management area in a way that provides for: (a) The efficient use of land and infrastructure (including the National Grid) within the immediately preceding growth area stage before the development of the subsequent growth area stage as shown in Appendix C and Appendix D; and ... Explanation The servicing sequencing and timing of urban development within the urban limits for the western Bay of Plenty is critical to achieving integrated and sustainable growth management, including the National Grid. Each Large-scale urban growth (greenfield and brownfield) area in Appendix C and Appendix D and shown on Maps 5 to 15 (Appendix E) must be subject to detailed structure planning to address, among other matters, urban design, and provisions and funding of network infrastructure and funding of that infrastructure.</p> <p>Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth – urban environments ... (g) Ensuring that nationally sufficient infrastructure, including the National Grid, is protected to ensure the safe operation, maintenance, upgrade and development.</p> <p>Policy UG 22B: Te Tiriti o Waitangi Principles Ensure planning decisions provide for te Tiriti o Waitangi principles by: ... (g) To acknowledge that in limited circumstances the National Grid may have a functional need or operational need to locate in areas of importance to Māori. Extensive consultation will be undertaken if this is required. Explanation ...</p>

Submission # 27

Submission on Proposed Change 6 [NPS-D]
Transpower New Zealand Limited

September 2022

Proposed Change 6 Provision	Support / Oppose / Amend	Comments / Reasons	Outcome sought
		<p>With respect to the new policy, Te Tiriti o Waitangi Principles Transpower respects the importance of the matters identified. However, Transpower will likely need to locate the National Grid in areas that have Māori values or are significant areas. Transpower works hard to avoid these areas but it is not always possible. As such a policy pathway is required to enable a consenting route for National Grid assets. It is therefore suggested that the policy be amended to include provision for the National Grid where there is a functional need or operational need. Please note that the proposed wording is draft only, Transpower would be willing to work with the parties to refine this as appropriate.</p>	<p>Māori housing and associated activities including growth through papakāinga development on ancestral land both within and outside of existing and planned urban areas. Protection of marae from reverse sensitivity effects generated by incompatible uses or development that could constrain or inhibit cultural activities expected on a marae. However, some activities including the National Grid can have a functional need or operational need to be located in sensitive areas. While these are to be avoided if possible, there needs to be a path to consent for such activities/infrastructure with national or regional significance.</p>

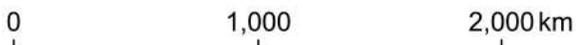
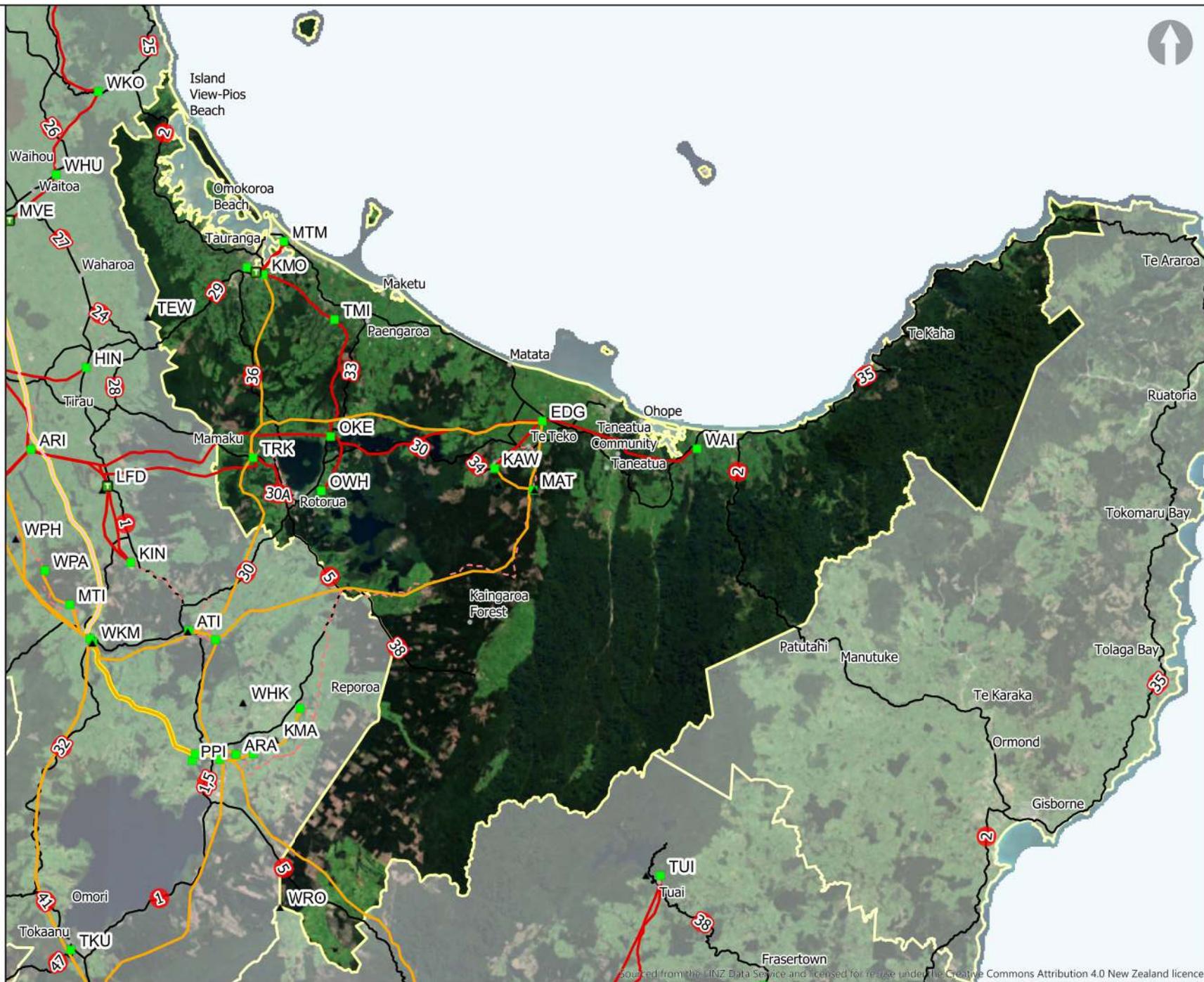
Appendix 1: Bay of Plenty Area National Grid Transmission Assets

Transpower Assets

Bay of Plenty Region

Legend

- Region
- Boundary
- NZ Roads
- Highways
- Transpower Assets**
- Cable Protection Zone
- Overhead Fibre Cable
- Underground Fibre Cables
- Site**
- ACSTN
- COMMS
- HVDC
- TEE
- Transmission Line**
- 0kV Overhead
- 11, 66kV Underground
- 11, 33, 66 kV Overhead
- 110kV Underground
- 110 kV Overhead
- 220kV Underground
- 220 kV Overhead
- 350 kV Overhead
- 350kV Submarine
- 400kV Overhead



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