

Further Submission by Transpower NZ Limited on the Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement

10 February 2023

Keeping the energy flowing



Further Submission # FS10

Further Submission on Proposed Change 6 (NPS-UD)
Transpower New Zealand Limited

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Further 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**
Toi Moana Bay of Plenty Regional Council
PO Box 364
Whakatāne 3158

By email: rpschange6@boprc.govt.nz

Address for Service and Correspondence

Transpower New Zealand Limited
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Form 6

Further submission in support of, or in opposition to, submission on notified
proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To Bay of Plenty Regional Council (“the Council”)

Name of person making further submission: Transpower New Zealand Limited
 (“Transpower”)

**This is a further submission in support of, and in opposition to, submissions on the
proposed Freshwater Planning Instrument Part of the Proposed Bay of Plenty Change
6 (NPS-UD) Regional Policy Statement (“Proposed RPS”).**

Transpower has an interest in the Proposed RPS Change 6 that is greater than the interest
the general public has, for reasons including the following:

- Transpower is the owner and operator of the National Grid and the National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 (“NPSET”) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”). The Proposed RPS must give effect to the NPSET. Transpower has an interest in ensuring that the Proposed RPS meets this statutory obligation.
- Transpower has an interest as a landowner and/or occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.
- Transpower made an original submission on matters raised or affected by other submissions.

Overview

Transpower New Zealand Ltd (“Transpower”) welcomes the opportunity to provide a further submission on Proposed Change 6 NPS-US (“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;

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- 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.

Key Issues and Approach Sought

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'.

Further to Transpower's submission we make the following Further Submission to ensure that Proposed Change 6 appropriately recognises the National Grid and provides for its ongoing operation, maintenance, upgrade and development.

Specific comments on Proposed Change 6 (NPS-UD)

The following table outlines Transpower's Further Submission on the Proposed Change 6 provisions.

Transpower wishes to be heard in support of its further submission.

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.



Signature of person authorised to sign on behalf of Transpower New Zealand Limited

Date:	10 February 2023
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Contact person:	Trudi Burney

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Original Submission	Proposed Change 6 Provision	Support / Oppose / Amend	Outcome sought	Comment
	Issues, Objectives and Policies			
Kāinga Ora Submitter #05	Policy UG7A (a) Policy UG7Ax	Support in part	Kainga Ora requests inclusion of FDS alongside HBA. Request inclusion of housing choice and equitable for public transport. Request that well is replaced with adequate (in UG7Ax (c)).	Transpower is generally supportive of the Kainga Ora submission but does wonder if HBA is still required (UG7A(a)). Refer to Submission #11. Transpower is neutral on these changes.
Federated Farmers Submitter #06	Policy UG7A	Support	Federated Farmers make a general submission and note that there are often conflicts with urban areas and the rural surrounds. Reverse Sensitivity is one of the main factors raised, and the need to maintain existing protections.	Transpower agrees with these comments and notes the importance of retaining existing protections.
Tauranga City Council Submitter #09	2.8 and 2.8.1 Objective 25 UG5A UG6A UG7A, UG7A, UG9B, UG13B UG14 B UG18B UG20B	Support in part	It is noted that the City Council makes a number of submission points. Transpower is generally neutral in regards to these. However, agrees with some of the specific wording proposed.	Transpower agrees with comments and updates to the wording, including the changes to the western Bay of Plenty sub-region. This also includes reference to integration with existing development and transport. Transpower notes that TCC propose the deletion of UG5BA, while Transpower is generally supportive it is concerned that something needs to take its place. This could be UG6A? UG14B is particularly supported by Transpower as it relates to infrastructure as is UG18B.

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Bell Road Partnership Ltd Submitter #11	2.8.1 UG7A UG18B	Support/ Oppose	This submission makes a number of comments with reasons, while not directly relevant to Transpower, they do raise some good points.	Transpower notes that generally correct interpretation of various plans and what should be included. Transpower is generally supportive. However, Transpower does not agree with the recommendation for UG18B. Transpower considers that any change could impact on Transpower's interests.
Fonterra Submitter #15	UG7A new (g)	Support	Fonterra are generally supportive, but have requested a number of changes.	Transpower requests that this be amended to be 'on lawfully established activities'. It does not need to be specific to industrial or rural production.
Forest and Bird Protection Society of New Zealand Inc Submitter #17	UG5A UG6A UG7A UG7Ax UG9B UB14B UB19B	Support/ Oppose	The submission includes a number of points. Of relevance to Transpower are the need to reinstate a version of UG5A to explain why western Bay of Plenty sub-region not needed.	<p>Transpower requests that selective changes are made in regards to this submission.</p> <p>Transpower does not support the deletion of UG5A. Unless there is a clear replacement, either as a new UG5A or some other policy.</p> <p>Transpower supports the need for infrastructure to support development in UG6A.</p> <p>Transpower is generally neutral in regards to UG7A.</p> <p>Transpower is generally neutral in regards to UG7Ax, on the grounds that there will be no adverse impact on Transpower. However, if there are any potential implications to Transpower then we would not be neutral.</p> <p>Transpower is supportive of UG9B.</p> <p>Transpower has concerns in regards to UB14B and UB19B in relation to the words proposed. Transpower does not support changing urban activities with residential activities. Urban activities are more encompassing, and not replaceable by residential activities.</p>

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Horticulture New Zealand Submitter #18	UG7A and UB14B	Generally Support	HortNZ request an amendment to the wording to ensure that highly productive land is avoided from urban development.	Transpower generally agrees. Transpower wants to make sure that this does not exclude the need to locate National Grid infrastructure on rural land. Urban development could include infrastructure unless otherwise excluded.
KiwiRail Holdings Limited Submitter #20	Issue 2.8.1 Objective 25 UG6A UG7A UG7Ax UG10B UG13B UG14B	Support	KiwiRail requests a number of changes to provide clarity to the wording of the RPS.	Transpower are generally supportive of the submission, including the provision to ensure that infrastructure is provided for. No suggested changes are recommended.
Waka Kotahi NZ Transpower Agency Submitter #31	Issue 2.8.1 UG7A UG13B 3.2.1 (Directive Methods), Method 18 (Structure plans for land use changes)	Generally Support		Transpower are generally supportive of the changes requested by Waka Kotahi. They align with the corporate direction of Transpower.