

Further Submission by Transpower New Zealand Limited
Proposed Otago Regional Policy Statement

12 November 2021

Keeping the energy flowing



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 Otago 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, a number of submissions on the proposed Selwyn District Plan.

Transpower has an interest in the Proposed Otago Regional Policy Statement (“Proposed ORPS”) 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 ORPS must give effect to the NPSET. Transpower has an interest in ensuring that the Proposed ORPS 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.

Transpower’s further submission

Transpower’s support of, or opposition to, a particular submission including the reason for Transpower’s support or opposition and the relief sought are detailed in the table attached as Appendix A. The general reasons for Transpower’s further submission are set out below. These reasons apply to each submission listed in Appendix A and are supplemented by specific reasons and relief in Appendix A.

General reasons and decisions sought in respect of submissions supported by Transpower

For each of the submissions identified in Appendix A as being supported by Transpower, they are supported to the extent that they:

- give effect to the NPSET;
- are the most appropriate means of exercising the Council’s functions in respect of section 32 of the RMA;
- enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.

Transpower seeks that the submissions it supports be allowed to the extent that they achieve the matters set out above or such further alternate relief or amendments as may be necessary to achieve those matters.


General reasons and decisions sought in respect of submissions opposed by Transpower

For each of the submissions identified in Appendix A as being opposed by Transpower, they are opposed to the extent that they failed to achieve the matters set out above.

Transpower seeks that the submissions it opposes be disallowed to the extent that they fail to achieve the matters set out above or such further alternative relief or amendments as may be necessary to achieve those matters.

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: **12 November 2021**

Electronic address for service: **ainsley@amconsulting.co.nz**

Telephone: **+64 27 215 0600**

Postal address: **8 Aikmans Road, Merivale, Christchurch 8014**

Contact person: **Ainsley McLeod**

Appendix A – Transpower New Zealand Limited: Further Submission on Submissions Made on the Proposed Otago Regional Policy Statement

The following table sets out the decisions sought by Transpower, including the reasons for Transpower’s support or opposition and the specific amendments to the provisions of the Proposed ORPS as a result.

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|---------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Blackthorn Lodge Glenorchy Limited (submission number 00119) | | | | |
| 00113.014 | <p>LF – Land and freshwater LF – FW – M7</p> <p>Amend as follows:</p> <p>[...]</p> <p>(2) include provisions to avoid, <u>remedy or mitigate</u> the adverse effects of activities on the significant and outstanding values of outstanding water bodies,</p> <p>(3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the subdivision, use or development of <u>urban development land</u>, and</p> <p>[...]</p> | Support | Transpower supports the relief sought on the basis that requiring provisions to be included in district plans that ‘avoid’ adverse effects is contrary to the NPSET (insofar as the provisions relate to the National Grid). | Allow the submission. |
| 00119.035 | <p>TERP – Definitions</p> <p>Add a definition of ‘minimise’ as follows:</p> <p>“reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning”.</p> | Neutral | Transpower does not oppose the inclusion of a definition of ‘minimise’ but suggests that the consequences (intended or unintended) must be understood before such a definition is included. That is, consideration should be given to whether applying the definition to all situations in the Proposed ORPS where the term is used is consistent with the anticipated outcome, or whether the definition would change the outcome. Transpower notes that minimise could also mean ‘make less’, as opposed to ‘reduce to the smallest amount’. | Disallow the submission until all consequences (intended and unintended) are understood. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Trojan Holdings Limited (submission number 00206) | | | | |
| 00206.009 | <p>TERP – Definitions</p> <p>Insert a definition for ‘minimise; as below:</p> <p>“Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning”.</p> | Neutral | <p>Transpower does not oppose the inclusion of a definition of ‘minimise’ but suggests that the consequences (intended or unintended) must be understood before such a definition is included. That is, consideration should be given to whether applying the definition to all situations in the Proposed ORPS where the term is used is consistent with the anticipated outcome, or whether the definition would change the outcome. Transpower notes that minimise could also mean ‘make less’, as opposed to ‘reduce to the smallest amount’.</p> | <p>Disallow the submission until all consequences (intended and unintended) are understood.</p> |
| Fonterra Co-operative Group Limited (submission number 00213/00233) | | | | |
| 00213.005 | <p>TERP – Definitions</p> <p>Insert new definition of Reverse sensitivity as follows, or words to similar effect:</p> <p><u>“means the potential for the operation of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment of other activities which are sensitive to the adverse environmental effects being generated by the pre – existing activity.”</u></p> | Support | <p>Transpower supports the inclusion of a definition of ‘reverse sensitivity’ as proposed.</p> | <p>Allow the submission.</p> |
| 00213.009 | <p>TERP - Definitions</p> <p>Replace the definition of ‘Sensitive activities’ with the following:</p> <p><u>includes the following:</u></p> <p>(1) <u>residential activity</u></p> <p>(2) <u>visitor accommodation</u></p> <p>(3) <u>community facility</u></p> <p>(4) <u>educational facility</u></p> <p>(5) <u>health care facility</u></p> | Neutral | <p>Transpower does not oppose replacing the definition of ‘sensitive activities’ but notes that it is important for the definition to be consistent with the NPSET so that provisions in the Proposed ORPS that relate to the National Grid appropriately give effect to the NPSET.</p> | <p>Allow the submission, subject to any replacement definition being consistent with the NPSET.</p> |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| WAI Wānaka (submission number 00222) | | | | |
| 00222.021 | SRMR – Significant resource management issues for the region SRMR – 17 Refer to the National Policy Statement for Indigenous Biodiversity | Oppose | Transpower does not support the inclusion of reference to the draft National Policy Statement for Indigenous Biodiversity on the basis that the NPS is yet to be gazetted and, as such, the content is not confirmed and it does not have legal weight. | Disallow the submission. |
| Kāi Tahu ki Otago / Aukaha (submission number 00226) | | | | |
| 00226.243 | EIT – Energy, infrastructure and transport EIT – INF – P16 Amend clause 5 as follows: “(5) minimising the adverse effects of the electricity transmission network on urban amenity, and avoiding adverse effects on town centres, <u>areas of significance to mana whenua such as wāhi tūpuna</u> , areas of high amenity or recreational value and existing sensitive activities. | Oppose | Transpower opposes the relief sought on the basis that the NPSET does not require the ‘avoidance’ of areas of significance to mana whenua. Transpower further notes that, given the linear nature of the National Grid (and the need to transmit electricity between two distant locations), it may not be possible to avoid the ‘areas’ of significance. | Disallow the submission. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated (submission number 00230) | | | | |
| 00230.002 | GEN – General Submission The RPS should be amended throughout to remove the term environmental limits and replace it with the outcome sought (e.g. ‘to maintain and restore ecosystem health and indigenous biodiversity’) unless it is clear that there is a specific environmental limit which cannot be breached for that particular objective policy or method. | Support | Transpower supports the submission and agrees with the statement included in the submission, as follows: <i>“While ‘environmental limits’ may be defined in the future through subsequent plans or provision under the proposed framework for the Natural and Built Environment Act, this has yet to occur and until it does the term has little effect.”</i> | Allow the submission. |
| 00230.003 | GEN – General Submission In relation to the use of effects management hierarchies, seek consistent amendments throughout the RPS to place the emphasis on avoiding the effects in the first place. | Oppose | Transpower opposes the submission to the extent that the relief sought incorrectly gives priority to the avoidance of adverse effects. This is not consistent with section 5 of the RMA and, to the extent that the relief is relevant to the National Grid, does not give effect to the approach to effects management in the NPSET. | Disallow the submission. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|---------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Otago Fish & Game Council and the Central South Island Fish & Game Council (submission number 00231) | | | | |
| 00231.017 | TERP - Definitions Insert definition: “Minimise means to reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.” | Neutral | Transpower does not oppose the inclusion of a definition of ‘minimise’ but suggests that the consequences (intended or unintended) must be understood before such a definition is included. That is, consideration should be given to whether applying the definition to all situations in the Proposed ORPS where the term is used is consistent with the anticipated outcome, or whether the definition would change the outcome. Transpower notes that minimise could also mean ‘make less’, as opposed to ‘reduce to the smallest amount’. | Disallow the submission until all consequences (intended and unintended) are understood. |
| Te Rūnanga o Ngāi Tahu (submission number 00234) | | | | |
| 00234.017 | CE – Coastal environment CE – O5 Renumber and amend as follows: “CE – O5 O6 – Activities in the coastal environment <u>To enable activities to locate in the coastal environment due to functional or operational need, or to provide for the cultural, social or economic wellbeing of people or their health and safety, provided: A activities in the coastal environment:</u> (1) <u>any adverse effects on Ngāi Tahu on cultural values, including adverse effects on customary fisheries including mātaītai reserves and taiāpure, are avoided;</u> (2) <u>any other adverse environmental effects are avoided, remedied or mitigated;</u> (3) <u>efficient use is made of space occupied in the coastal marine area,</u> (4) <u>activities are of a scale, density and design compatible with their location and the need to manage adverse effects; and,</u> (5) <u>are only provided for within appropriate locations and limits, and</u> | Oppose | Transpower does not support the relief sought on the basis that the amended provisions would require the National Grid to ‘avoid’ adverse effects in a manner that is inconsistent with the NPSET. | Disallow the submission to the extent that that relief requires the National Grid to avoid adverse effects. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| | <u>public access</u> to and along the coastal marine area, including for customary uses <u>including mahika kai and kaimoana gathering is maintained or enhanced, except where public access needs to be restricted for reasons of health and safety or ecological or cultural sensitivity.</u> " | | | |
| Horticulture New Zealand (submission number 00236) | | | | |
| 00236.080 | EIT – Energy, infrastructure and transport EIT – INF – P16 Clarify what ‘electricity transmission infrastructure’ EIT – INF – P16 applies to. Amend EIT – INF – P16 (5) by adding “and highly productive land” | Oppose | Subject to the relief sought in Transpower’s submission, Transpower opposes the relief sought on the basis that the amendments are not consistent with NPSET and it is not clear how production is reduced by transmission infrastructure. | Subject to Transpower’s submission, disallow the submission. |
| Federated Farmers of New Zealand (submission number 00239) | | | | |
| 00239.004 | HPSW – Statutory Context Amend as follows or similar: “The regional policy statement must give effect to higher order national direction instruments, including National Environmental Standards (NES) , National Policy Statements (NPS), and the New Zealand Coastal Policy Statement (NZCPS), and should be written to comply with the National Planning Standards <u>and to not duplicate or conflict with National Environmental Standards (NES).</u> ” | Support | Transpower supports the submission and agrees that the text, as notified, is technically inaccurate. | Allow the submission. |
| 00239.130 | EIT – Energy, infrastructure and transport EIT – INF – P16 Amend as follows: - Define or clarify the term ‘electricity transmission infrastructure’ - Amend EIT – INF – P16(5) as follows or similar: “(5) minimising the adverse effects of the electricity transmission network <u>on existing land uses and</u> urban amenity, and avoiding adverse effects on town centres, areas of high amenity or recreational value, <u>highly productive soils, and</u> existing sensitive activities.” | Oppose | Subject to the relief sought in Transpower’s submission, Transpower opposes the relief sought on the basis that the amendments are not consistent with NPSET and the submission does not include any evidence to suggest that the National Grid would have an adverse impact on highly productive soils. | Subject to Transpower’s submission, disallow the submission. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| 00239.194 | <p>GEN – General Submission</p> <p>Note that the application of the Te Mana o Te Wai hierarchical approach across all chapters of the RPS is going beyond the intent of the NPSFM 2020.</p> | Support | Transpower supports the submission and considers that the Proposed ORPS inappropriately applies the Te Mana o Te Wai hierarchical approach across all chapters of the RPS and, as such, goes beyond the intent of the NPSFM 2020 and, where relevant to the National Grid, does not give effect to the approach to effects management in the NPSET. | Allow the submission. |
| Port of Otago Limited (submission number 00301) | | | | |
| 00301.007 | <p>TERP - Definitions</p> <p>Amend the definition of ‘regionally significant infrastructure’ as follows:</p> <p>“means: <u>all infrastructure identified as nationally significance infrastructure.</u> (2) roads classified as being of regional importance in accordance with the One Network Road Classification...”</p> | Support | Transpower supports the relief sought and agrees that all nationally significant infrastructure should also be confirmed as regionally significant so that the various policies and methods similarly apply. | Allow the submission. |
| Waka Kotahi NZ Transport Agency (submission number 00305) | | | | |
| 00305.005 | <p>TERP – Definitions</p> <p>Include a definition of Reverse Sensitivity, and we suggest the following, or similar, definition, which is taken from the Partially Operative Otago RPS 2018 as follows:</p> <p>“The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the established activity.”</p> | Support | Transpower supports the inclusion of a definition of ‘reverse sensitivity’ as proposed. | Allow the submission. |
| 00305.020 | <p>LF – Land and freshwater LF – VM – O2</p> <p>Amend the objective to cross reference provisions in other chapters of the RPS that provide for modification of waterbodies as a result of infrastructure works</p> <p>OR</p> <p>Include a new specific provision, to recognise that, at times, it may be necessary to undertake infrastructure</p> | Support | Transpower supports the relief sought and considers that it is appropriate to recognise that it may be necessary to undertake infrastructure works in waterbodies. This is particularly the case of linear infrastructure such as the National Grid. It is considered that the amendments sought, insofar as | Allow the submission. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| | works that may modify the shape and behaviour of waterbodies. | | they relate to the National Grid, are necessary to give effect to the NPSET. | |
| 00305.021 | LF – Land and freshwater LF – VM – O5 Amend the objective to cross reference provisions in other chapters of the RPS that provide for modification of waterbodies as a result of infrastructure works, or include a new specific provision, to recognise that, at times, it may be necessary to undertake infrastructure works that may modify the shape and behaviour of waterbodies. | Support | Transpower supports the relief sought and considers that it is appropriate to recognise that it may be necessary to undertake infrastructure works in waterbodies. This is particularly the case of linear infrastructure such as the National Grid. It is considered that the amendments sought, insofar as they relate to the National Grid, are necessary to give effect to the NPSET. | Allow the submission. |
| Meridian Energy Limited (submission number 00306) | | | | |
| 00306.012 | TERP – Definitions Amend as follows: “Upgrade means activities to bring existing structures up to current standards or to improve the functional characteristics of structures, provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity. Within the footprint of authorised renewable electricity generation activities, upgrade also means increasing the generation or transmission capacity, or the efficiency or security of regionally significant infrastructure; and replacing ancillary structures” | Neutral | Transpower does not oppose the inclusion of a definition of ‘upgrade’ but suggests that the consequences (intended or unintended) must be understood before such a definition is included. | Disallow the submission until all consequences (intended and unintended) are understood. |
| 00306.064 | EIT – Energy, infrastructure and transport EIT–INF – General Insert a guidance note before Objective EIT – INF – O4 as follows: “ <u>The EIT – INF provisions of this RPS do not apply to infrastructure that is part of renewable electricity generation activities. The EIT – EN provisions of this RPS apply to infrastructure that is part of renewable electricity generation activities.</u> ” | Neutral | Transpower does not oppose the relief sought but notes that the definition of ‘renewable electricity generation activities’ in the NPSREG includes parts of the National Grid. Transpower is concerned that the relief sought may inadvertently result in parts of the National Grid not being subject to the EIT-INF provisions. Transpower seeks that any exclusion for REG does not exclude the National Grid. | Allow the submission subject to any exclusion not also excluding the National Grid. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| 00306.095 | EIT – Energy, infrastructure and transport EIT – INF – General Clarify that the EIT – INF sub – chapter of the pORPS21 does not apply to renewable electricity generation activities by inserting the following <u>“The EIT – INF provisions of this RPS do not apply to infrastructure that is part of renewable electricity generation activities. The EIT – EN provisions of this RPS apply to infrastructure that is part of renewable electricity generation activities.”</u> | Neutral | Transpower does not oppose the relief sought but notes that the definition of ‘renewable electricity generation activities’ in the NPSREG includes parts of the National Grid. Transpower is concerned that the relief sought may inadvertently result in parts of the National Grid not being subject to the EIT-INF provisions. Transpower seeks that any exclusion for REG does not exclude the National Grid. | Allow the submission subject to any exclusion not also excluding the National Grid. |
| Christchurch International Airport (submission number 00307) | | | | |
| 00307.003 | SRMR – Significant resource management issues for the region SRMR – I4 Include discussion of the risk that incompatible urban growth can pose for significant infrastructure. Urban growth and infrastructure provision and planning should be done hand – in – hand, whilst supporting the recognition in SRMR – I4 that urban growth is a significant resource management issue, in particular the recognition that urban development can lead to reverse sensitivity effects and impacts on infrastructure if not appropriately managed and located. | Support | Transpower supports the relief sought in the submission on the basis that the amendment is, insofar as it relates to the National Grid, consistent with the issues addressed by Policies 10 and 11 of the NPSET. | Allow the submission. |
| Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand (submission number 00310) | | | | |
| 00310.003 | SRMR – Significant resource management issues for the region Add a new Significant Resource Management Issue that addresses the need to operate, maintain, develop and upgrade infrastructure. Initial drafting to include: <u>“The operation, maintenance, upgrade and development of infrastructure is essential to enabling people and communities to provide for their social, cultural and economic well – being and necessary to support safe, responsive and resilient communities. Infrastructure are</u> | Support | Consistent with the relief sought in Transpower’s submission, Transpower supports the inclusion of a new issue in the SRMRs to address the need to operate, maintain, upgrade and develop regionally significant infrastructure. | Allow the submission in a manner that is consistent with Transpower’s submission. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| | <u>often also lifeline utilities and must be able to function to the fullest possible extent in emergencies.”</u> | | | |
| Trustpower Limited (submission number 00311) | | | | |
| 00311.003 | TERP - Definitions Retain definition and ensure that clause (3) of the definition is retained. AND Specify that Regionally Significant Infrastructure also includes Nationally Significant Infrastructure. | Support | Trustpower supports the relief sought and agrees that all nationally significant infrastructure should also be confirmed as regionally significant so that the various policies and methods similarly apply. | Allow the submission. |
| Queenstown Airport Corporation (submission number 00313) | | | | |
| 00313.004 | IM – Integrated management IM – P1 Delete | Support | Trustpower supports the submission and agrees that <i>“the ordinary principles of interpretation should apply to the PORPS. In this circumstance clauses 1, 2 and 3 do not further assist with interpretation. Clause 4 results in IM-O1 to IM-O4 being paramount and it is unclear what this will mean in implementation.”</i> | Allow the submission. |
| Aurora Energy Limited (submission number 00315) | | | | |
| 00315.015 | SRMR – Significant resource management issues for the region Add a new significant resource management issue addressing the extent to which the aspirations, challenges and resource management issues are supported by a well – functioning electricity distribution network, suggested drafting as follows: <u>“SRMR – IX Resilient electricity supply is critical to the health, wellbeing and prosperity of Otago, particularly in adapting to climate change. Statement Electricity supply is essential to our way of life. It supports community wellbeing, health, safety and economic prosperity. It also has a critical role to play in adapting to</u> | Support | Consistent with the relief sought in Trustpower’s submission, Trustpower supports the inclusion of a new issue in the SRMRs to address the need to operate, maintain, upgrade and develop regionally significant infrastructure. | Allow the submission in a manner that is consistent with Trustpower’s submission. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------|----------------|
| | <p><u>climate change by supporting communities to become less reliant on fossil fuels for heating and transport. As such there will be a need for electricity network providers to undertake significant development and upgrades to support the communities needs in the future.</u></p> <p><u>Context</u></p> <p><u>Otago’s electricity supply comprises electricity generation (primarily from hydro – electricity generation); transmission through the National Grid; distribution from grid – exit points to zone substations, electricity sub – transmission infrastructure and finally through the distribution network to consumers.</u></p> <p><u>The electricity distribution network connects Otago to electricity supply. As such, faults in the network can have a direct impact on the health and safety and wellbeing of people and communities. The importance of electricity distribution to the community is reinforced by its identification as a lifeline utility. Electricity distribution providers have obligations to plan and prepare for significant natural hazard events to ensure that supply is able to be maintained and/or reinstated as soon as practicable.</u></p> <p><u>Climate change will have adverse effects on these network providers by increasing the risks to the infrastructure due to increasing storm intensity, increasing temperatures etc. This will occur in conjunction with increasing demands on the network due to population growth and greater reliance on electricity. Providers will need to adapt to other changes including more small – scale community electricity generation (such as in home solar). and should be avoided by providing a framework for the operation, maintenance, upgrade and development of that infrastructure.</u></p> <p><u>Impact Snapshot</u></p> | | | |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------|----------------|
| | <p><u>Environmental</u></p> <p><u>The distribution network has adverse effects on the environment which need to be appropriately managed. However, the management of the distribution network is limited by its functional and operational needs which often dictate where it can be located in the environment.</u></p> <p><u>The development, operation, maintenance and upgrade of the distribution network can be constrained or adversely affected by the establishment of incompatible activities around the network which can give rise to reverse sensitivity effects.</u></p> <p><u>Economic</u></p> <p><u>The distribution network is critical to the economic wellbeing of people and communities. Faults in the distribution network arising from natural hazards; adverse effects from climate change and incompatible activities increase the risk of network faults.</u></p> <p><u>Failing to proactive manage incompatible activities in proximity to the distribution network may require those activities to be dis – established and cause unintended economic loss.</u></p> <p><u>A lack of integrated management and long – term strategic planning for land – use activities can delay urban growth and land use changes reliant on an electricity supply.</u></p> <p><u>Social</u></p> <p><u>Incompatible activities can have adverse effects on the distribution network and may give rise to reverse sensitivity effects. This is particularly the case where urban expansion and intensification seeks to locate near the distribution network to a degree that can create risks to the health and safety and wellbeing of people. To avoid those risks, it is appropriate to manage incompatible activities near the distribution network, including primarily</u></p> | | | |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p><u>electricity sub – transmission infrastructure and significant electricity distribution infrastructure.</u></p> <p><u>Where the electricity network is not resilient enough it can exacerbate the adverse effects and consequences of adverse weather events and natural hazards which can impact on communities already affected by these events.”</u></p> <p>OR</p> <p>Amend the SRMR to include a new issue that addresses the need to operate, maintain, develop and upgrade regionally significant infrastructure.</p> <p>Aurora Energy welcomes the opportunity to work with the Council and other infrastructure providers to develop this text and in doing so, acknowledges that the new issue does not need to be exclusive to the distribution network, but may also relate to other important infrastructure and should recognise the critical role of electricity supply in achieving New Zealand’s carbon zero future.</p> | | | |
| 00315.046 | <p>EIT – Energy, infrastructure and transport EIT – INF – P10</p> <p>Amend as follows:</p> <p>“Decision making on the allocation or use of natural and physical resources must take into account <u>the functional and operational</u> needs of nationally and regionally significant infrastructure.”</p> | Support | Transpower supports the relief sought and considers that the amendment provides greater clarity and, insofar as the Policy relates to the National Grid, is generally consistent with Policy 3 of the NPSET. | Allow the submission. |
| Network Waitaki Limited (submission number 00320) | | | | |
| 00320.002 | <p>TERP – Definitions</p> <p>Rationalise the definitions that relate to the electricity infrastructure and make consequential changes to the wording in the relevant provisions for the following definitions</p> <ul style="list-style-type: none"> • Additional infrastructure • Distribution network • Electricity sub – transmission infrastructure | Support | Transpower supports the submission and agrees that there is a lack of clarity in respect of the various definitions that relate to electricity infrastructure. As set out in Transpower’s submission amendments to the Proposed ORPS are necessary to clearly distinguish the National Grid to facilitate the Proposed ORPS properly giving effect to the NPSET. | Allow the submission and make amendments sought in Transpower’s submission to clearly distinguish the National Grid (and related provisions). |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> Specified infrastructure Other infrastructure | | | |
| 00320.010 | <p>TERP – Definitions</p> <p>Replace all instances of the term “electricity transmission network” with “electricity distribution network”.</p> | Oppose | Transpower opposes the deletion of “electricity transmission network” but considers that the Proposed ORPS is not clear in respect of which provisions relate to the National Grid as opposed to other electricity infrastructure. As set out in Transpower’s submission, amendments to the Proposed ORPS are necessary to clearly distinguish the National Grid to facilitate the Proposed ORPS properly giving effect to the NPSET. | Disallow the submission and instead make amendments sought in Transpower’s submission to clearly distinguish the National Grid (and related provisions). |
| 00320.024 | <p>EIT – Energy, infrastructure and transport EIT – INF – P11</p> <p>Delete or amend as follows:</p> <p>“ Except as provided for by ECO – P4, a <u>Allow</u> for the operation and maintenance of existing nationally and regionally significant infrastructure. while:</p> <p>(1) ——— avoiding, as the first priority, significant adverse effects on the environment, and</p> <p>(2) ——— if avoidance is not practicable, and for other adverse effects, minimising adverse effects.”</p> | Support | To the extent that Policy EIT-P11 may apply to the National Grid, Transpower supports the relief sought on the basis that the NPSET does not direct that effects of operation and maintenance activities should be avoided in the first instance. | Allow the submission. |
| Wayfare Group Limited (submission number 00411) | | | | |
| 00411.015 | <p>TERP – Definitions</p> <p>Insert a new definition of ‘minimise’ as follows:</p> <p>“Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.”</p> | Neutral | Transpower does not oppose the inclusion of a definition of ‘minimise’ but suggests that the consequences (intended or unintended) must be understood before such a definition is included. That is, consideration should be given to whether applying the definition to all situations in the Proposed ORPS where the term is used is consistent with the anticipated outcome, or whether the definition would change the outcome. Transpower notes that minimise could also mean ‘make less’, as opposed to ‘reduce to the smallest amount’. | Disallow the submission until all consequences (intended and unintended) are understood. |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| Wise Response Society Inc (submission number 00509) | | | | |
| 00509.092 | <p>LF – Land and freshwater LF – LS – M12</p> <p>Amend as follows:</p> <p>“Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</p> <p>(1) manage land use change by:</p> <p>...</p> <p>(b) prohibiting minimising the removal of tall tussock grasslands, and</p> <p>(2) provide for and promote encourage the creation and enhancement of vegetated riparian margins and constructed wetlands, and maintain these where they already exist, and</p> <p>...</p> <p><u>(4) Actively promote changes in land use that improve the sustainable and effective use fresh water, reduce the need for chemical inputs and that are consistent with national net zero carbon goals and</u></p> <p><u>(5) implementation of policies LF – LS – P16 to LF–LF–P22.”</u></p> | Oppose | Transpower does not support the use of the term ‘prohibit’ in this ‘method’ on the basis that it may direct a response in district plans that is inappropriately stringent and would not promote the integrated management of resources. | Disallow the submission. |
| PowerNet Limited (submission number 00511) | | | | |
| 00511.002 | <p>TERP – Definitions</p> <p>Rationalise the definitions that relate to the electricity infrastructure and make consequential changes to the wording in the relevant provisions for the following definitions</p> <ul style="list-style-type: none"> • Additional infrastructure • Distribution network • Electricity sub – transmission infrastructure • Specified infrastructure • Other infrastructure | Support | Transpower supports the submission and agrees that there is a lack of clarity in respect of the various definitions that relate to electricity infrastructure. As set out in Transpower’s submission amendments to the Proposed ORPS are necessary to clearly distinguish the National Grid to facilitate the Proposed ORPS properly giving effect to the NPSET. | Allow the submission and make amendments sought in Transpower’s submission to clearly distinguish the National Grid (and related provisions). |

| Submission Reference | Provision and Relief Sought | Support/ Oppose | Reason | Allow/Disallow |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 00511.010 | TERP – Definitions Replace all instances of the term “electricity transmission network” with “electricity distribution network”. | Oppose | Transpower opposes the deletion of “electricity transmission network” but considers that the Proposed ORPS is not clear in respect of which provisions relate to the National Grid as opposed to other electricity infrastructure. As set out in Transpower’s submission amendments to the Proposed ORPS are necessary to clearly distinguish the National Grid to facilitate the Proposed ORPS properly giving effect to the NPSET. | Disallow the submission and instead make amendments sought in Transpower’s submission to clearly distinguish the National Grid (and related provisions). |
| 00511.024 | EIT – Energy, infrastructure and transport EIT – INF – P11 Delete or amend as follows: “ Except as provided for by ECO – P4, a Allow for the operation and maintenance of existing nationally and regionally significant infrastructure. while: (1) avoiding, as the first priority, significant adverse effects on the environment, and (2) if avoidance is not practicable, and for other adverse effects, minimising adverse effects.” | Support | To the extent that Policy EIT-P11 may apply to the National Grid, Transpower supports the relief sought on the basis that the NPSET does not direct that effects of operation and maintenance activities should be avoided in the first instance. | Allow the submission. |

RPS

From: Ainsley McLeod <ainsley@amconsulting.co.nz>
Sent: Wednesday, 17 November 2021 12:00 p.m.
To: RPS
Subject: PORPS Further Submission - Transpower New Zealand Limited
Attachments: Transpower Otago Regional Policy Statement Further Submission (Final) 2.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Further Submission

Hi there

It has come to my attention that I had odd footers and an incorrect page break in the further submission filed on Friday.

Would it be possible to replace the earlier version with this document? No words have changed and this is the version served on submitters.

Many thanks
Ainsley

Ainsley McLeod

Director // Planner
Ainsley McLeod Consulting
Mobile +64 27 215 0600
ainsley@amconsulting.co.nz

