

Environment Canterbury Land Use Recovery Plan Review

Comments from Transpower New Zealand Limited

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Keeping the energy flowing



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1 High Level Review Comments

Transpower New Zealand Limited (“Transpower”) welcomes the ability to provide comments on the Land Use Recovery Plan (“LURP”) in advance of its review by Environment Canterbury (“ECan”).

The National Grid is critical to the recovery and rebuild. In broad terms, Transpower considers that there is minimal coverage of the National Grid in the LURP and seeks that the review process better acknowledges the need to both enable and protect the National Grid through the recovery and rebuild phase.

2 Understanding of the LURP

Transpower acknowledges the LURP is a statutory document which directs the Christchurch City, Waimakariri and Selwyn District Councils to make changes to their district plans and the Canterbury Regional Council to make changes to the Canterbury Regional Policy Statement (and other instruments). The LURP took effect on 6 December 2011 and sets a policy and planning framework deemed necessary to:

- rebuild existing communities;
- develop new communities;
- meet the land use needs of business;
- rebuild and develop infrastructure needed to support these activities; and,
- take account of natural hazards and environmental constraints that may affect the rebuild and recovery.

The Christchurch Earthquake Recovery Act 2011 (CER Act) requires that any decisions on resource consents or notices of requirement, or changes to planning documents must not be inconsistent with the LURP.

3 Transpower New Zealand Ltd’s Interests

Transpower is the State Owned Enterprise that owns, operates, maintains and develops New Zealand’s high voltage transmission network - the National Grid. The transportation of electricity to and throughout the Canterbury region is critical to the rebuild and recovery and it is within this context that Transpower provides these comments on the effectiveness of the LURP. Transpower is of the opinion that the LURP needs to provide a framework which protects the National Grid from development which may compromise its efficiency or effectiveness while also enabling its operation, maintenance upgrading and development.

Transpower acknowledge that while the LURP is prepared under the CER Act (as opposed to the Resource Management Act 1991 (RMA)), it also needs to be not inconsistent with National Policy Statements (NPS), including the NPS for Electricity Transmission (NPSET). Under the RMA, Regional Policy Statements, Regional Plans and District Plans have been amended by the LURP, and are required to ‘give effect’ to the NPSET.

Transpower has a range of infrastructure and assets within the greater Christchurch metropolitan area that forms the focus for the LURP. This includes 220kV overhead lines, 110kV overhead lines, 66kV lines and substations.

Transpower is actively engaging in processes under the RMA in the Region (e.g. the Christchurch Replacement District Plan) which seek to achieve common goals in respect of the recovery and rebuild programme.

4 Review Comments

Transpower's review comments have focused on the high level and more strategic aspects of the LURP which provide the direction for residential and business land use matters to support recovery and rebuild.

4.1 Strategic Infrastructure

The term 'strategic infrastructure' is defined in the LURP¹ as:

*"Facilities, services and installations that are of importance beyond a local area and that sustain the community; includes horizontal infrastructure, transport networks, seaport, airport, railway, defence facilities, telecommunication facilities and **electricity transmission network**" (emphasis added).*

While the goals of the LURP include *having a range of affordable housing options connected to community and **strategic infrastructure** that provides for residents' participation in social, cultural and economic activities*², the term is only applied in the context of nationally significant transport infrastructure – Christchurch International Airport and Lyttleton Port.

The limited use and narrow focus of the term 'strategic infrastructure' is commented on below. First, however, Transpower wishes to acknowledge and support the inclusion of the 'electricity transmission network' in the LURP.

4.2 Section 4.1.1: Provide Housing Choice – Infill and Intensification

The LURP puts in place measures to promote infill and intensification and this is the focus of Section 4.1.1. Transpower considers there should be more recognition that while infill and intensification is required to support recovery, it needs to be managed in a way that does not compromise the safe, efficient and effective operation of strategic infrastructure. Existing strategic infrastructure, such as the transmission of electricity, is critical to the recovery and rebuild and needs appropriate protection.

It is envisaged that this protection will largely come from other planning documents (i.e. District Plans) as directed by Actions 1 – 14 of the LURP. However, Transpower considers that acknowledgement in the LURP (Volume 1) is also important to provide an overarching protective framework. For example, the LURP defines a 50dBA noise contour around the Christchurch International Airport on Figure 4 to address reverse sensitivity effects in the context of greenfield priority areas. Similar recognition of reverse sensitivity issues faced by the National Grid is also required.

¹ Page 45

² Section 2.0, page 11

4.3 Section 4.2.1: Greenfield Housing Development

Transpower has not investigated in detail the location of greenfield residential areas identified in the LURP for new residential subdivisions, but note that some of the areas identified include land which contains National Grid assets.

This being the case, and while noting the section is focused on enabling residential development (as opposed to constraints), Transpower considers that in addition to natural hazards and environmental constraints, existing infrastructure constraints should also be referenced.

4.4 Section 4.3: Providing for Business (Action 24)

It is noted that some of the areas identified as greenfield business areas in the LURP include land which contains National Grid assets.

While noting the section is focused on enabling commercial and industrial development (as opposed to constraints), Transpower considers that recognition should also be given to the constraints of such development. Action 24(viii) includes a reference to the Christchurch Airport and that an integrated approach to greenfield priority areas (business) located near the airport is required.

In the context of the function it plays in the recovery and rebuild, Transpower considers that similar recognition of the National Grid would be appropriate in Volume 1.

4.5 Section 4.4 – Delivering Infrastructure and Service

The LURP notes that well-functioning infrastructure is essential to recovery and on this basis requires that:

- repair and upgrading of roads and other infrastructure services are integrated with land use development
- transport networks and services are managed to support community and business needs while repairs and upgrading are underway; and,
- strategic freight transport networks are supported to function effectively.

Transportation networks are obviously essential to the recovery and rebuild; however, Transpower considers that the last bullet point should not be confined to just transport networks. Rather, it should more broadly refer to 'strategic networks'. This would remain inclusive of transportation networks, but also capture other strategic infrastructure which is critical for the recovery and rebuild (i.e. the National Grid).

4.6 Section 4.4.3 – Support Strategic Transport Networks and Freight

Section 4.4.3 provides commentary on the strategic transport networks and freight that are to be supported. This includes the roading network, rail network, Christchurch International Airport and Lyttleton Port. Transpower notes that, in the context of the Airport, noise is identified as having potential negative health and amenity effects on those that live nearby. On that basis, a reverse sensitivity instrument to prevent noise sensitive activities within the 50dBA Ldn contour is included both to:

- avoid adverse health and amenity effects on residents; and,
- enable the airport to safely and efficiently operate and to continue to develop and expand.

Transpower considers that there should be similar recognition for non-transport related strategic infrastructure and note that the commentary on the Airport provides a good platform for introducing Transpower's approach to corridor management.

4.6.1 Actions 36 – 39

Transpower considers that these actions should extend beyond just transport networks and include other strategic infrastructure, inclusive of the National Grid.

4.7 Amendments to Canterbury Regional Policy Statement (Action 44)

The LURP directed Environment Canterbury to amend the Regional Policy Statement; however, it is somewhat unclear as to whether the detailed planning provisions (i.e. the enforced changes to the Regional Policy Statement, Regional Plans and District Plans) are also subject to the review.

Transpower suspects they do and notes the following provisions included in the Regional Policy Statement:

Objective 6.2.1: Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

- (9) *integrates strategic and other infrastructure and services with land use development;*
- (10) *achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;*

Policy 6.3.5: Integration of land use and infrastructure

Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:

- (3) *Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;*
- (4) *Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A; and*
- (5) *Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.*

Transpower is of the opinion that the Chapter 6 RPS provisions, whilst reasonably generic, provide an adequate platform in the RPS for Transpower to both enable and protect its assets under the LURP framework. Transpower notes that other infrastructure, such as the Christchurch International Airport is specifically referenced and on that basis, Transpower considers that the National Grid should be referenced because of its importance to the recovery and rebuild.

Transpower considers that the reasonably generic provisions in the RPS should be complemented by coverage in Volume 1 of the LURP in accordance with its comments above. In other words, the fact

that Transpower considers the RPS is adequate does not render its omission in Volume 1 justified. Transpower considers that Volume 1 of the LURP is the 'go to' document when assessing the LURP and therefore needs to appropriately recognise the National Grid in the context of the recovery and rebuild.

It is noted that the Chapter 16 RPS provisions (outside the scope of the LURP review) would also apply which include:

Policy 16.3.4 – Reliable and resilient electricity transmission network within Canterbury

To encourage a reliable and resilient national electricity transmission network within Canterbury by:

- (1) *having particular regard to the local, regional and national benefits when considering operation, maintenance, upgrade or development of the electricity transmission network;*
- (2) *avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed;*
- (3) *enabling the operational, maintenance, upgrade, and development of the electricity transmission network provided that, as a result of route, site and method selection, where;*
 - (a) *The adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable, remedied or mitigated; and*
 - (b) *other adverse effects on the environment are appropriately controlled.*

5 Concluding Review Remarks

The National Grid is critical to the recovery and rebuild. In this context, Transpower considers it important that the National Grid's role in the recovery and rebuild is given appropriate acknowledgement in order to provide an overarching framework for its enablement and protection.

Transpower is happy to discuss any aspect of the contents of this letter and look forward to hearing from you in due course.