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To: [Mailroom Mailbox](#)
Cc: ["Joanne.Moore@transpower.co.nz"; Anna Cameron](mailto:Joanne.Moore@transpower.co.nz)
Subject: pCARP Further Submissions on behalf of Transpower New Zealand Limited [KS-KSNational.FID286510]
Date: Friday, 10 July 2015 10:47:22 a.m.
Attachments: [Further Submissions of Transpower New Zealand Limited on submissions to the Proposed Canterbury Air Regional Plan.pdf](#)

We **attach** for lodgement a copy of Further Submissions by Transpower New Zealand Limited.

Please do not hesitate to contact me if you have any queries.

Kind regards,

Nicky

Nicky McIndoe

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Further Submission on Proposed Canterbury Air Regional Plan

**Form 6: Further Submissions in support of, or in opposition to,
submission on a Publicly Notified Proposed Policy Statement or
Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991**

Return your signed further submission by 5.00pm Friday 10 July 2015 to:

Freepost 1201 Proposed Canterbury Air Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

FOR OFFICE USE ONLY

Submitter ID:

File No:

Full Name: _____ **Phone (Hm):** _____
Organisation*: Transpower New Zealand Limited **Phone (Wk):** 04 915 0818
* the organisation that this further submission is made on behalf of
Postal Address: _____ **Phone (Cell):** _____
_____ **Postcode:** _____
Email: nicky.mcindoe@kensingtonswan.com **Fax:** _____

Contact name and postal address for service of person making further submission (if different from above):

Nicky McIndoe, Kensington Swan, PO Box 10246, Wellington 6143

Only certain people can make further submissions. Please tick the option that applies to you:

- ☐ I am a person representing a relevant aspect of the public interest; or
☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
☐ I am the local authority for the relevant area.

- ☐ I do not wish to be heard in support of my further submission; or
☒ I do wish to be heard in support of my further submission; and if so,
☐ I would be prepared to consider presenting your further submission in a joint case with others making a similar submission at any hearing

Service of your further submission:

Please note: any person making a further submission must **serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury**. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____ **Date:** 10 July 2015

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

Further submissions of Transpower New Zealand Limited on submissions to the Proposed Canterbury Air Regional Plan

	Submission	Relief sought by submitter	Position of further submitter	Reason for support/opposition
1	pCARP – 1065 Horticulture New Zealand	Insert a definition for “reverse sensitivity” as follows: <u>Reverse sensitivity – means the vulnerability of an existing lawfully established activity to complaint from other activities located in the vicinity which are sensitive to adverse environmental effects that may be lawfully generated by the existing activity, thereby creating the potential for the operation of the existing activity to be constrained.</u>	Support	The phrase “reverse sensitivity” is used in the pCARP (see for example, policy 6.8). Transpower supports the definition suggested by Horticulture New Zealand because it will add clarity to the Plan.
2	pCARP – 2687 Meridian Energy Limited	Amend the definition of “emergency electricity generation” as follows: Means the use of internal combustion generators to generate electricity at times when National Grid electricity supply is not available due to a failure of either the National Grid or the local distribution network <u>or to provide for electricity to facilitate a Black Start.</u> This definition applies to the generation of electricity used on site and not distributed via the grid.	Support	Transpower supported the notified version of “emergency electricity generation” because Transpower uses diesel powered large scale internal combustion devices for this purpose. Transpower supports the extension of the definition to also encompass the provision of electricity to facilitate a “Black Start” (being the process of restoring a power station without relying on the National Grid).
3	pCARP – 715 Fonterra Co-operative Group Limited	Amend policy 6.10 as follows: All activities that discharge into air apply, at least the best practicable option so that cumulative effects are minimised.	Support	Transpower’s submission supported the notified version of policy 6.10. However, Transpower agrees that the amendment sought by Fonterra clarifies the policy, and on that basis, supports it.

	Submission	Relief sought by submitter	Position of further submitter	Reason for support/opposition
4	pCARP – 758 Lyttelton Port Company Limited	Amend policy 6.19 as follows: Enable discharges of contaminants into air associated with large scale, industrial and trade activities and nationally and regionally significant infrastructure in locations ...	Oppose	Transpower opposes the submission because Transpower supports the recognition in policy 6.19 of the need to enable discharges associated with nationally and regionally significant infrastructure.
5	pCARP – 2572 Christchurch City Council	Amend policy 6.23 as follows: <u>Electricity networks will manage the supply of power in case of either emergency or excess demand on the network through use of embedded or temporary generation. Use of generators will be limited to the duration of the emergency or reduction [in] peak load on the network and testing and maintenance.</u>	Oppose	Transpower is an electricity network operator, but it does not generate any electricity. Therefore, Transpower is not able to manage the supply of power through the use of embedded or temporary generation. Accordingly, Transpower opposes the new suggested policy.
6	pCARP – 2725 and 2731 Meridian Energy Limited	Amend rule 7.24 as follows: The discharge of contaminants into air, for the purpose of emergency electricity generation, maintenance and peak electricity network load management, from the combustion of diesel, petrol, liquefied petroleum gas or compressed natural gas in any stationary large scale natural combustion device with a net energy output capacity up to and including <u>1MW within a Clean Air Zone; or up to and including 2MW outside a Clean Air Zone</u> 3kW is a permitted activity provided the following conditions are met: 1. For any device with a net energy output capacity up to and including 300kW ... 2. For any device with a net energy output capacity up to and including 300kW ... <u>2A. For any device with a net energy output of 301kW to 2MW the discharge ...</u> Delete rule 7.25 as a result of the above amendment.	Support	Transpower supports the amendments sought by Meridian because they would remove the requirement to obtain a controlled activity resource consent for emergency generation with a capacity between 300kW and 2MW. The effects of such an activity are well known so that they can be regulated using permitted activity standards. There is no environmental benefit from requiring a controlled activity consent for this activity.

	Submission	Relief sought by submitter	Position of further submitter	Reason for support/opposition
7	pCARP – 3024 Canterbury Aggregate Producers Group	The submitter seeks the deletion of rule 7.37 and the replacement of it with a new permitted activity rule for mineral extraction activities.	Oppose	Transpower opposes the rule sought because it would permit all discharges of dust associated with mineral extraction activities within a property boundary. The National Grid can be affected by dust, and therefore could be adversely affected by mineral extraction activities taking place on properties which the National Grid traverses.
8	pCARP – 3025 Canterbury Aggregate Producers Group	The submitter seeks that rule 7.38 be deleted and be replaced with a new restricted discretionary activity rule relating to mineral extraction activities.	Oppose	Transpower opposes the new rule because it would restrict the Council's discretion to discharges occurring beyond the boundary of the site. If National Grid lines are located within a site they could be adversely affected by dust discharges associated with mineral extraction activities, and therefore it is important the Council is not prevented from considering these effects when considering a resource consent application. Further, the proposed rule would prevent the Council publicly notifying any application, or serving notice on affected persons (unless there are special circumstances). Accordingly, the proposed rule would prevent Transpower being able to submit on mineral extraction activities which could adversely affect the National Grid.

	Submission	Relief sought by submitter	Position of further submitter	Reason for support/opposition
9	pCARP – 1248 Mrs Carey Barnett – Alastair and Carey Barnett	The submitter seeks a new section in schedule 3 setting out what information regarding smoke management must be provided in Farm Environment Plans.	Oppose in part	The National Grid could be affected by the burning of material including crop stubble. Therefore, Transpower could support the provision sought by the submitter as long as subparagraph 5 is amended to state “... Transit New Zealand if the burn is close to a state highway, <u>Transpower New Zealand if the burn is close to any National Grid line or substation, New Zealand Fire Service ...</u> ” In addition, Transpower seeks that subparagraph 6(f) is amended to state “notify any neighbours <u>or infrastructure operators</u> that might be affected that you are going to burn”.