

From: [Jess Bould](#)
To: [Mailroom Mailbox](#)
Subject: PC4 pLWRP Further Submission
Date: Tuesday, 17 November 2015 11:45:53 a.m.
Attachments: [NZ1-11667868-PC4 pLWRP Transpower Further Submission Final.pdf](#)

Good morning,

Please find attached a further submission on behalf of Transpower New Zealand Limited.

Many thanks,

Jess

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Further Submission by Transpower New Zealand Limited

Plan Change 4 Canterbury Land and Water Regional Plan

17 November 2015

Keeping the energy flowing



Further submission in support of, and in opposition to, submissions on Plan Change 4 Canterbury Land and Water Regional Plan

To Canterbury Regional Council (the Council)

Name: Transpower New Zealand Limited (Transpower)

This is a further submission in support of, and in opposition to, a number of submissions on Proposed Plan Change 4 to the Canterbury Land and Water Plan (PC4)

Transpower has an interest in PC4 that is greater than the interest that the general public has, for reasons including the following:

- Transpower has an interest as a landowner and occupier in respect of existing and future infrastructure which is potentially affected (directly or indirectly) by the relevant submissions; and
- In respect of many submissions, Transpower made an original submission on matters raised or affected by those submissions.

Transpower's further submission

Transpower's support of, or opposition to, a particular submission including the reasons for Transpower's support or opposition and the relief sought are identified in the detailed table included in Schedule 1 (attached). The general reasons for Transpower's further submission are set out below. These reasons apply in respect of the each submission identified in Schedule 1 and are also supplemented by the more specific reasons and relief in Schedule 1.

General reasons in respect of submissions supported by Transpower

For each of the submissions identified in Schedule 1 as being supported by Transpower, they are supported because, and to the extent to which, they:

- Give effect to the National Policy Statement on Electricity Transmission 2008 (NPSET);
- Are consistent with, and/or promote the outcomes sought by, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA);
- Enable people and communications to provide for their social, economic, and cultural well-being and for their health and safety;
- Will sustain the potential of the National Grid, being a physical resource of national significance;
- Enable the protection of Transpower's infrastructure and operations in the region;
- Are the most appropriate means of exercising Council's functions in respect of section 32 of the RMA; and
- Are consistent with the outcomes sought in Transpower's original submission.

Transpower seeks that the submissions it supports be allowed to the extent that they achieve the matters set out above or such further alternative 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 Schedule 1 as being opposed by Transpower, they are opposed because, and to the extent to which, they fail 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.

If others make a similar submission, Transpower will consider presenting a joint case with them at a hearing.

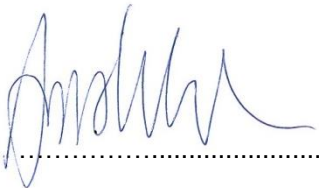
Address for service of further submitter: c/- Beca Limited
PO Box 13960
Armagh Street
Christchurch 8141

Telephone: +64 3 371 3661

Mobile: +64 27 215 0600

Email: ainsley.mcleod@beca.com

Contact person: Ainsley McLeod, Technical Director – Planning



A handwritten signature in blue ink, appearing to read 'Ainsley McLeod', is written over a horizontal dotted line.

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

Date 17 November 2015

Schedule 1: Transpower New Zealand Limited – Further Submission

Submitter	Plan Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Definitions				
Forest and Bird (52265)	Definition of vegetation clearance (PC4 LWRP-116) - Delete (b); retain (f) and (g) Forest and Bird oppose clause (b) as they consider the exemption to be too broad and does not recognise the effects of clearance for structures and utilities.	Oppose	The implications of not being exempt from clearing vegetation from structures and utilities would restrict access for maintenance requirements which may potentially compromise operation, create risk in relation to fire hazard and does not give effect to Policy 2 of the NPSET.	Disallow
Rangitata Diversion Race Management Limited (56706)	Definition of vegetation clearance If definition is retained, amend to provide for repair and upgrade of network utilities and regionally and nationally significant infrastructure.	Support	The submission is generally consistent with the relief sought in Transpower's submission.	Allow
Policies				
Whitewater New Zealand (65910)	New Policy to support 4.86 (PC4 LWRP-169) Insert a new policy to say ' Key recreation sites are protected through avoiding activities within the beds and margins of lakes, rivers, hapua, wetlands, coastal lakes and lagoons that may damage recreation sites, and where these activities cannot be avoided, the use of best practicable options to minimise all impacts and retain or restore key features are utilised.'	Support in part	Transpower's submission acknowledges that there may be instances where not all effects can be avoided and the approach to adopt the best practicable option approach in this instance is generally supported by Transpower.	Allow
Meridian Energy Limited (53960)	Policy 4.85A (PC4 LWRP-8) Amend Policy 4.85A, including the reference to only restricting (not preventing) encroachment of activities into the beds of lakes and rivers.	Support	The submission is generally consistent with the relief sought in Transpower's submission.	Allow
Rangitata Diversion Race Management Limited (56706)	Policy 4.85A (PC4 LWRP-365) Amend policy 4.85A to include upgrading and establishment of nationally and regionally significant infrastructure.	Support	The submission is generally consistent with the relief sought in Transpower's submission.	Allow

Submitter	Plan Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Rules				
Waimakariri District Council (53284)	Rule 5.96 (PC4 LWRP-214) Retain condition 1 (and 2) which includes a permitted activity condition requiring the discharge not being from, into or onto contaminated , or potentially contaminated, land.	Oppose in part	Transpower's considers that discharge from contaminated or potentially contaminated land should be enabled as a permitted activity, provided there is an interceptor system in place. This is relevant to discharges from Transpower's substation sites.	Disallow and amend the rule to allow discharges to land from contaminated sites provided there is an interceptor system in place prior to the discharge.
Ellesmere Sustainable Agriculture Inc (52210)	Rule 5.141 PC4 LWRP-51 Delete the amendment to condition 2 of Rule 5.141 which restricts temporary discharges associated with activities (including maintenance under Rule 5.139)	Support	The reason for Transpower's support is that the proposed amendments in the context of maintenance do not take an approach that is consistent with the establishment of structures under Rule 5.135. For instance, support structures may be constructed all year, but cannot be maintained between 1 March and 1 June.	Allow