

12th October 2018

Environment Canterbury Regional Council
c/o Consents Hearings
PO Box 345
Christchurch 8140
Attn: Alison Cooper
Via Email: Hearings@ecan.govt.nz

Dear Alison,

RE: Hearing Statement by Transpower New Zealand Limited on Resource Consent Application (Ref: CRC190445) by Christchurch City Council for the Comprehensive Stormwater Network Discharge to Land and Water.

1. I am writing to confirm that Transpower New Zealand Limited (**Transpower**) will not be attending the hearing commencing Monday 5th November on the resource consent applications (Ref: CRC190445) by Christchurch City Council for the Comprehensive Stormwater Network Discharge to Land and Water. Instead, Transpower requests that this hearing statement is tabled at the hearing in support of Transpower's submission.
2. Transpower understands that Christchurch City Council is applying to Environment Canterbury for a Comprehensive Stormwater Network Discharge Consent (CSNDC), with a consent duration of 25 year sought. The application seeks consent to discharge water and contaminants to land and water, including coastal water, from all existing and future stormwater networks within Christchurch City and the settlements of Banks Peninsula.
3. Transpower operates a number of National Grid transmission lines and substations in the Christchurch City area; see the map in Appendix A.
4. As set out in its submission dated 29th August 2018, Transpower is concerned, given the nature of the consent application, that stormwater discharges could occur in close proximity to its transmission lines and/or support structures. This has potential to negatively affect the safe and efficient operation of National Grid infrastructure.

5. Transpower proposed in its submission conditions to address these concerns. Transpower considers that any potential adverse effects from the proposed comprehensive stormwater network discharge on its assets could be addressed through the condition sought in its submission; see Appendix B.

General comments on the Section 42A Report

6. Transpower has reviewed the Section 42A Officer's report (the **Report**), by Nick Reuther on behalf of Environment Canterbury Regional Council.
7. The Officer identifies a number of information gaps required to determine the application. The Officer concludes that the application can be granted if the applicant provides further information to address these uncertainties and/or adopts the recommendations made through the s42A report.
8. Given the number of changes recommended in the s42A report, the Officer does not include a draft set of recommended conditions. The report states that this is to allow for further discussions between Christchurch City Council and Environment Canterbury Regional Council prior to, and during, the hearing to finalise the recommended conditions.
9. The Officer's report acknowledges Transpower's submission in Appendix 9.
10. Effects on Transpower have not been assessed elsewhere in the Officer's report. Nor has the Officer considered the National Policy Statement on Electricity Transmission 2008 (NPSET), the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34: 2001) (NZECP) or the Electricity Act 1992 in the s42A report.
11. Transpower's proposed conditions are not referred to in the s42A report aside from in Appendix 9 (summary of submissions).

Specific relief sought by Transpower

12. In accordance with its submission dated 29th August 2018, Transpower reiterates that should the application be granted, Transpower requests that the conditions attached in Appendix B be imposed on the consent to ensure that the operation, maintenance, upgrade and development of the National Grid is not compromised by the proposed development of the stormwater network, or discharges to land near its infrastructure, and that the NPSET is given effect to.

Conclusion

13. The Officer has not considered NPSET in the s42A report. Policy 10 of the NPSET requires all decision makers (including on resource consent applications) *"to ensure that operation maintenance, upgrading, and development of the electricity transmission network is not compromised."*

14. In its consideration of resource consent CRC190445, the decision maker should consider the national significance of a reliable and secure electricity supply, and the need to manage the effects of third party development on the transmission network.
15. Subject to Transpower's requested conditions, see Appendix B, Transpower considers that any effects associated with the project on the National Grid can be adequately addressed and can be appropriately avoided, remedied or mitigated.
16. Please see Transpower's submission for further details about the basis for the relief sought by Transpower.

Should you require clarification on any of the matters in this hearing statement, please contact me on 021 020 29670 or via email sarah.shand@transpower.co.nz

Yours faithfully,



Sarah Shand
Environmental Planner
TRANSPOWER NZ LTD

Attachments:

1. *Map of Transpower assets in Christchurch City*
2. *Requested Conditions of Consent*

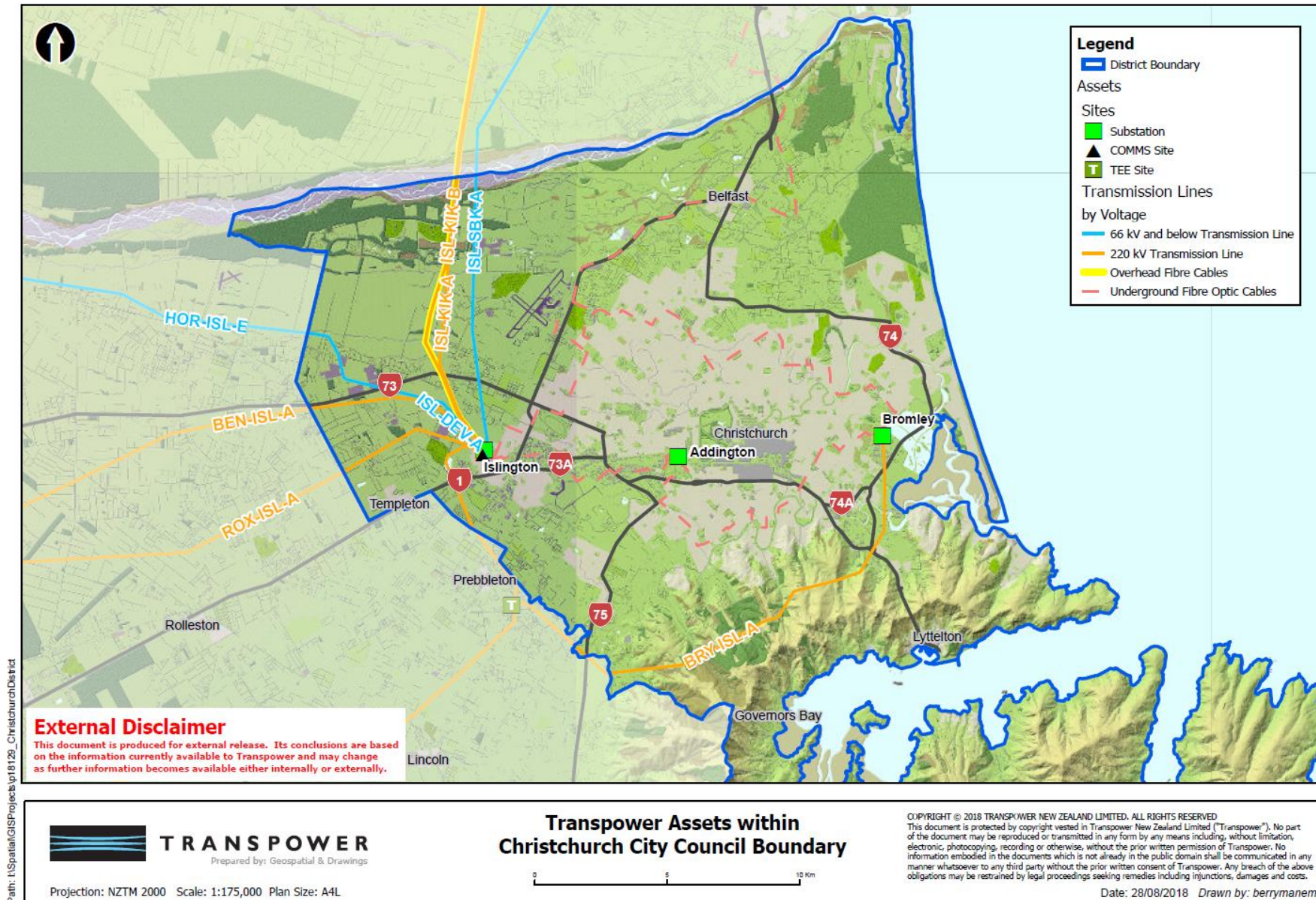
A copy of this hearing statement has also been served on Christchurch City Council:

Christchurch City Council
Attn: David Adamson
General Manager City Services

Delivered via email to: david.adamson@ccc.govt.nz

Appendix A

Aerial Map and list of Transpower's assets in Christchurch City



Appendix A

Aerial Map and list of Transpower's assets in Christchurch City

Transpower's Assets within Christchurch City

- *Benmore-Islington A (BEN-ISL-A) 220kV single circuit transmission line on steel towers*
- *Bromley-Islington A (BRY-ISL-A) 220kV double circuit transmission line on steel towers*
- *Hororata-Islington E (HOR-ISL-E) 66kV double circuit transmission line on single poles*
- *Islington-Deviation A (ISL-DEV-A) 66kV double circuit transmission line on steel towers*
- *Islington-Kikiwa A (ISL-KIK-A) 220kV single circuit transmission line on steel towers*
- *Islington-Kikiwa B (ISL-KIK-B) 220kV double circuit transmission line on steel towers*
- *Islington-Southbrook A (ISL-SBK-A) 66kV double circuit transmission line on steel towers*
- *Roxburgh-Islington A (ROX-ISL-A) 220kV single circuit transmission line on steel towers*
- *Addington Substation*
- *Bromley Substation*
- *Islington Substation*
- *South Island System Control Communications Site*
- *Southern Data Centre*

Appendix A

Aerial Map and list of Transpower's assets in Christchurch City

Access to the National Grid

Proposed condition: *The consent holder shall ensure that stormwater discharges are designed and managed to ensure Transpower's access to National Grid transmission lines, including support structures, is unaffected.*

Advice Note: *Transpower NZ Ltd has a right to access its existing assets under s23 of the Electricity Act 1992. Any development must not preclude or obstruct this right of access. It is an offence under s163D of the Electricity Act 1992 to intentionally obstruct any person in the performance of any duty or in doing any work that the person has the lawful authority to do under s23 of the Electricity Act 1992.*

Stormwater Discharges

Proposed Condition: *The consent holder must ensure that changes to the stormwater drainage patterns and runoff characteristics do not result in any adverse effects on the foundations of any National Grid support structure or any substation.*

NZECP Compliance

Proposed Condition: *All land use activities, including the construction of new stormwater discharge structures, earthworks, fences, any operation of mobile plant and/or persons working near exposed line parts shall comply with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) or any subsequent revision of the code.*