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Subject: Chapter 6 CRPS Submission
Date: Wednesday, 3 February 2021 11:29:58 am
Attachments: [Proposed Change 1 to Chapter 6 of the CRPS Transpower Submission.pdf](#)

Kia ora

Please find attached a submission made by Transpower New Zealand Limited on Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement.

Please acknowledge receipt in due course.

Nga mihi
Ainsley

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Submission by Transpower New Zealand Limited

Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement

3 February 2021

Keeping the energy flowing



Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To the Canterbury Regional Council (Environment Canterbury) ("the Council")

Name of submitter: Transpower New Zealand Limited ("Transpower")

This is a submission on a change proposed to the following policy statement ("the proposal"):

Canterbury Regional Policy Statement ("CRPS"): Proposed Change 1 to Chapter 6.

Transpower could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to are:

The proposal in its entirety, and particularly the extent to which the proposal gives effect to the National Policy Statement on Electricity Transmission 2008 ("NPSET").

Transpower's submission is:

Background: The National Grid

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid, that carries electricity across the country. The National Grid connects power stations, owned by electricity generating companies, to substations feeding the local networks that distribute electricity to homes and businesses. The National Grid is critically important, and nationally significant, infrastructure that is necessary for a reliable and secure supply of electricity throughout the country and that, in turn, supports national and regional growth.

The National Grid extends from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 12,000 kilometres of transmission lines and cables and more than 160 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

Transpower's Statement of Corporate Intent for 1 July 2020, states that:

"Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- as grid owner, to reliably and efficiently transport electricity from generators to distributors and large users; and*
- as system operator, to operate a competitive electricity market and deliver a secure power system."*

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the

National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. A key part of this is connecting new renewable energy generation to the National Grid – Transpower expects demand for electricity to increase over time as New Zealand transitions to a zero-carbon economy, and Transpower is uniquely placed to help enable that transition.

The Resource Management Act 1991 (“RMA”) and the National Grid

The national significance of the National Grid is recognised, in an RMA context, by the NPSET. Transpower’s submission is concerned with giving effect to the NPSET.

The NPSET confirms the national significance of the National Grid and provides policy direction in relation to:

- recognising the benefits of the National Grid;
- managing the adverse effects on the environment of the National Grid;
- managing the adverse effects of third parties on the National Grid; and
- long term strategic planning for transmission assets.

The single Objective of the NPSET is:

“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

In terms of the proposal, the management of adverse effects of other activities on the National Grid is particularly relevant and addressed by Policies 10 and 11 of the NPSET that require:

- decision-makers, to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised (Policy 10); and
- local authorities to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent (Policy 11).

Section 62(3) of the RMA requires a regional policy statement to give effect to a national policy statement and the proposal therefore must give effect to the NPSET. Further, future reporting on, and decision on, the proposal must also be made with consideration of the NPSET (clauses 83(1) and 84(1) of Schedule 1 to the RMA).

It is acknowledged that Policy 16.3.4 of the operative CRPS gives effect to Policies 10 and 11 of the NPSET and the proposal does not amend this Policy.

Transpower’s submission

Transpower understands that the purpose of the proposal is to identify new urban housing development areas in Rolleston, Rangiora and Kaiapoi in a manner that implements, in part, ‘Our

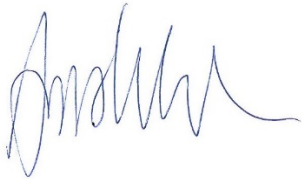
Space 2018–2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga’ and gives effect to the National Policy Statement on Urban Development 2020.

‘Map A – Greenfield Priority Areas’, that forms part of the proposal, identifies Future Development Areas in Rangiora, Kaiapoi and Rolleston. No National Grid assets are located in the identified Future Development Areas and Transpower does not have any immediate plans to develop new infrastructure in those Areas. The National Grid is closest to an identified Future Development Area at the western extent of Rangiora at more than 200 metres away.

Based on the location of the Future Development Areas, Transpower supports the proposal and considers that the proposal achieves the outcome sought by the NPSET and therefore, alongside operative Policy 16.3.4, gives effect to Policies 10 and 11 of the NPSET.

Transpower seeks the following decision from the Minister for the Environment:

That the proposal is approved as notified.



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

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