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Subject: Chapter 6 CRPS submission
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Attachments: [Orion Submission on plan change to CRPS.pdf](#)

Tēnā koe

Please find attached a submission lodged on behalf of Orion New Zealand Limited on Plan Change 1 to the Canterbury Regional Policy Statement.

I would be grateful if you could please acknowledge receipt.

Ngā mihi
Amy

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**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Canterbury Regional Council

Name of submitter: Orion New Zealand Limited (*Orion*)

- 1 This is a submission on Plan Change 1 to Chapter 6 of the Canterbury Regional Policy Statement (the **proposal / PC1**):
- 2 Orion could not gain an advantage in trade competition through this submission.
- 3 Orion's submission relates to the whole proposal. The general and specific reasons for Orion's relief are set out in full in **Annexure A**.
- 4 Orion seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would deal with Orion's concerns set out in this submission.

Signed for and on behalf of Orion New Zealand Limited by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner

12 February 2021

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ANNEXURE A

Introduction to Orion

- 5 Orion owns and operates the electrical distribution network that provides power to central Canterbury. Orion is one of the largest electricity distribution networks in New Zealand, supplying services to more than 204,000 homes and businesses. Orion's core purpose is to consistently deliver a safe, resilient and cost-effective power supply, and promote the safe and efficient use of electricity. Orion's network runs through various different types of environments and it requires constant maintenance, upgrade and further development.
- 6 Broadly, the electricity distribution network comprises a number of assets: underground cables, overhead lines, substations, transformers, kiosks, electricity structures (poles/pylons, earth rods and associated buildings) and access tracks. Orion is responsible for the establishment, operation, maintenance and upgrade of these assets and the network.
- 7 Electricity distribution networks are essential in the provision of safe, resilient, and cost effective power supply in our communities and the promotion of the safe and efficient use of electricity. The distribution network and its assets are significant infrastructure in a local, regional, and even national sense (being that they play a key role in distributing electricity from the larger transmission network, or National Grid) and are of strategic importance. The electricity distribution network also plays a key role in New Zealand's climate change adaptation and mitigation policy and will be critical for achieving a transition to a low emissions economy.

Orion's general position on the proposal

- 8 Orion, for the most part, supports the proposal to change the Canterbury Regional Policy Statement (*RPS*). Orion's primary concern is ensuring that there will be effective integration and protection of infrastructure in the proposed Future Development Areas (*FDAs*). Orion will play a central role in developing and integrating the necessary electricity distribution network in these areas.
- 9 Orion supports the inclusion of provisions in PC1 that provide for the need to integrate any development in the FDAs with the availability of infrastructure and the planning for delivery of infrastructure. It is important that PC1 and the RPS generally ensure that any new development is integrated with existing infrastructure (particularly critical and strategic infrastructure, such as the electricity distribution network) in an effective manner. Coordination and forward planning will be crucial in this endeavour.
- 10 Alongside provisions for integration of development and infrastructure, it is also important to ensure continued policy direction for the avoidance of reverse sensitivity effects on strategic infrastructure.

Integration of new infrastructure

- 11 Any urban development in the proposed FDAs will require extensive development of new infrastructure and in particular an extension of the electricity distribution network. This will likely involve the development, maintenance and upgrading of electricity distribution assets such as underground cables, overhead lines,

substations, and transformers. Orion will be responsible for the establishment and the integration of any new infrastructure with the existing network. Orion is concerned to ensure that the establishment and integration of any new infrastructure can be undertaken as effectively and efficiently as possible.

- 12 Policy 6.3.5 is an important policy in the RPS. That policy recognises that infrastructure should not be compromised by urban growth and intensification, and provides direction for the integration of land use and infrastructure. The proposed changes in PC1 must not displace the current policy direction that development is appropriately integrated with infrastructure.

Protection of infrastructure

- 13 The supply of electricity is critical to the Canterbury region. Both businesses and the larger community rely on the availability of electricity to function. It is of the utmost importance to provide for the protection of strategic infrastructure such as the electricity distribution network in the RPS.
- 14 In order to effectively operate the electricity distribution network, Orion has numerous sub-transmission and distribution lines, substations and other network assets near residential areas including where the proposed FDAs are located. Orion will also need to expand its network gradually in the future to continue to meet demand for servicing as communities grow.
- 15 This means that over time, residential developments will likely encroach on critical network infrastructure. The operation, maintenance and development of electricity distribution network infrastructure can create noise and other disturbances to sensitive activities, such as residential activities, in close proximity. This gives rise to the potential for reverse sensitivity effects to adversely impact on Orion's operations. It is critical that the amendments in Plan Change 1 retain an appropriate balance between enabling development in FDAs while ensuring that this development is done in a way that protects strategic infrastructure.
- 16 Orion proposes that Policy 6.3.12 make reference to protection of infrastructure, as well as integration. New development should be enabled in a way that protects infrastructure from adverse effects.

Relief

- 17 For the reasons explained above, Orion seeks the following relief:
- 17.1 Orion proposes a further amendment to Policy 6.3.7 to include a reference to Policy 6.3.5, as follows (underlined and shown in red): "Subject to Policy 5.3.4, Policy 6.3.5, and Policy 6.3.12, residential greenfield priority area development shall occur in accordance with Map A".
- 17.2 Orion proposes that Policy 6.3.12 be amended as follows (underlined and shown in red): "The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5".

- 17.3 Orion supports the reference to Policy 6.3.5 in proposed Policy 6.3.12(3) and seeks that it is retained.