

**Appendix 1 – Submission by Transpower New Zealand Limited on the
Proposed Queenstown Lakes District Plan – Stage 2**

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23 February 2018

Keeping the energy flowing



Form 5

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

Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council ("Council")
Name of submitter: Transpower New Zealand Limited ("Transpower")
This is a submission on: The Proposed Queenstown Lakes District Plan – Stage 2 ("PQLDP Stage 2")

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

The specific provisions of the PQLDP Stage 2 that this submission relates to are:

The PQLDP Stage 2 in its entirety and insofar as it relates to the National Grid, particularly the extent to which the PQLDP Stage 2 gives effect to the National Policy Statement on Electricity Transmission 2008 ("NPSET").

The specific details of Transpower's submission, and decisions sought in relations to the provisions of the PQLDP Stage 2, are set out in the following table.

Transpower's submission is:

Executive Summary

The National Grid is nationally (and regionally) significant infrastructure which is recognised within the Resource Management Act 1991 ("RMA") context by the NPSET and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA").

The PQLDP is required, among other things, to:

- (a) give effect to the provisions of the NPSET; and
- (b) not be in conflict with, nor duplicate, the provisions of the NESETA.

Transpower acknowledges Council's intent to meet these obligations and supports the general approach taken.

However, Transpower considers some amendments to the PQLDP Stage 2 are required in order to:

- (a) ultimately give effect to the proposed Otago Regional Policy Statement (at the time appeals are resolved and the Policy Statement becomes operative);
- (b) give effect to the NPSET;
- (c) achieve the purpose of the RMA;
- (d) represent the most appropriate means of exercising Council's functions having regard to the efficiency and effectiveness of the provisions relative to other means; and
- (e) discharge Council's duty under section 32 of the RMA.

This submission outlines necessary amendments to the PQLDP Stage 2 to meet these statutory requirements.

Background: The National Grid and Transpower's Assets in the Queenstown Lakes District

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network (the National Grid) that carries electricity across the country. It connects power stations, owned by electricity generating companies, to

substations feeding the local networks that distribute electricity to homes and businesses. The role of the National Grid is to enable New Zealand to achieve its international and local aspirations.¹ 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 national and regional economic growth.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. Transpower also provides a direct connection to some large industrial users (e.g. the Tiwai Point aluminium smelter). These users may be a considerable distance from the point of generation and as such, Transpower's assets traverse all regions.

The National Grid extends from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 12,000km of transmission lines and cables and around 170 substations. The National Grid also includes a telecommunications network of approximately 300 telecommunication sites. The telecommunications network connects and controls the various components of the National Grid (including substations).

Transpower's 30 year strategy for future development of the National Grid is set out in 'Transmission Tomorrow'. This document outlines the view that there will be an on-going role for the National Grid, and that the lines and substations Transpower owns and operates will be required into the future. As such, it is important that the existing transmission corridors are protected and maintained. Equally, it is important that where new infrastructure is required, this is recognised and provided for.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, and the Electricity (Hazards from Trees) Regulations 2003.

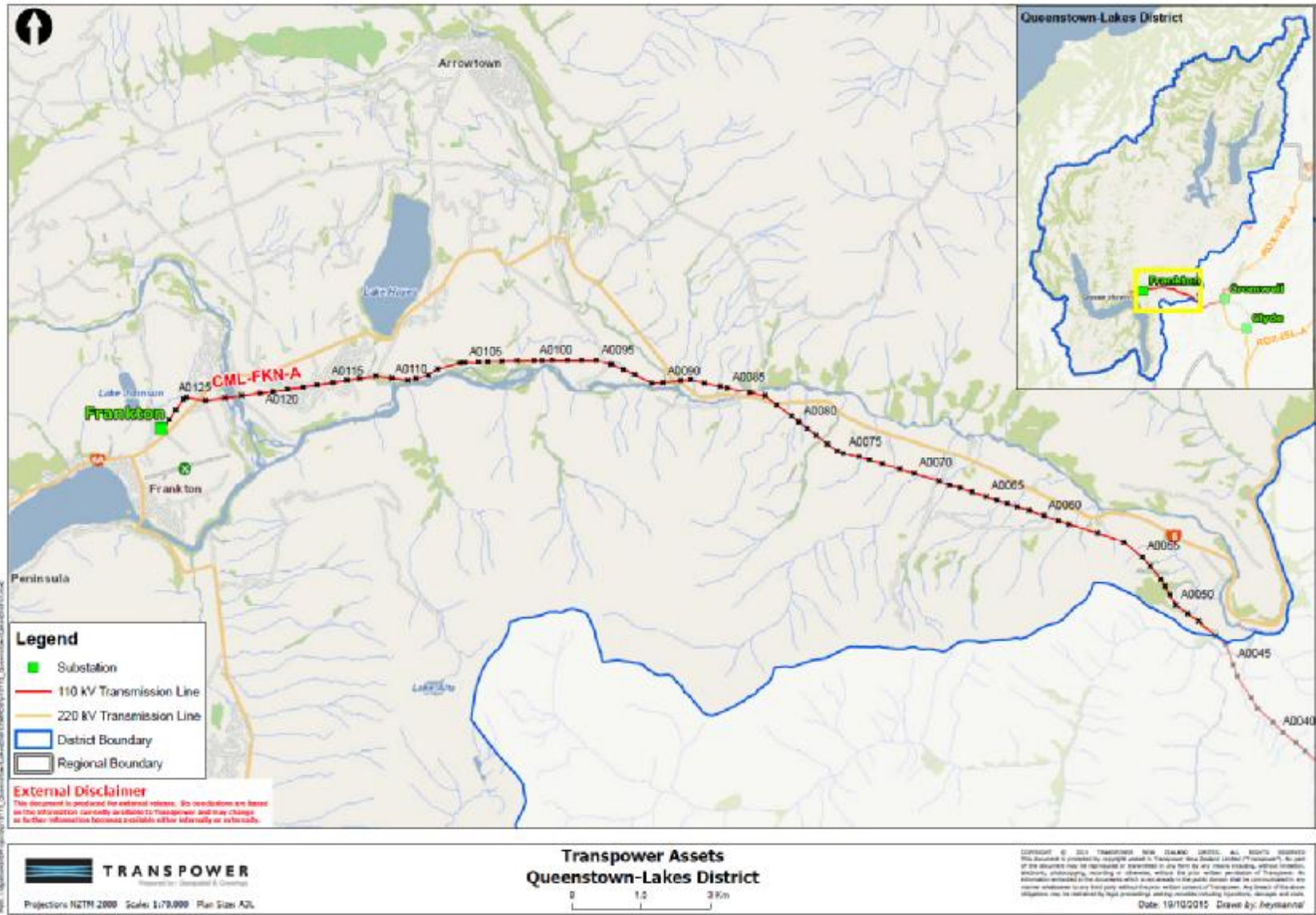
Transpower's interest in the PQLDP Stage 2 is because Transpower owns and operates a number of assets within, and traversing the Queenstown Lakes District. These assets include transmission lines, substations and associated infrastructure. These assets supply electricity to the Queenstown Lakes District as well as transmit electricity across the broader Otago Region and the rest of New Zealand.

Transpower's assets within the Queenstown Lakes District consist of the following:

- Cromwell - Frankton A (CML-FKN-A) 110kV overhead transmission line on double circuit steel towers; and
- Frankton Substation located at 93 Frankton-Ladies Mile Highway, Frankton. The substation has a total site area of 2.4559 hectares.

The following map shows the location of the National Grid assets within the Queenstown Lakes District.

¹ Transpower's Statement of Corporate Intent for July 2012 to June 2015.



The Resource Management Act 1991 and the National Grid

The national significance of the National Grid is recognised, in an RMA context, by the NPSET and the NESETA. These documents apply only to the National Grid, and do not apply to local electricity distribution networks, nor lines owned and operated by generators. Much of Transpower's submission is focused on the requirements of these documents.

National Policy Statement on Electricity Transmission 2008

The NPSET was gazetted on 13 March 2008 and confirms the national significance of the National Grid and provides policy direction in relation to:

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

A key reason for introducing the NPSET in 2008 was to resolve the inconsistencies that resulted from the variable provision for the National Grid in RMA plans and policy statements. This variance was despite the fact that the National Grid is largely the same across the country. In promoting the NPSET, central government accepted the importance and benefits of a nationally consistent approach to decisions on transmission activities. The preamble of the NPSET highlights that the National Grid has particular physical characteristics and operational/security requirements that create challenges for its management under the RMA, and it is important there are consistent policy and regulatory approaches by local authorities.

The RMA amendment to Regulation 10 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003,² by inserting section 2(i) further acknowledges the importance of the National Grid by requiring Transpower to be served notice of applications for resource consents or for review of resource consent conditions that may affect the National Grid.

The single Objective of the NPSET is as follows:

“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.”*

The NPSET Objective is supported by fourteen Policies. In a general sense these policies address the following:

- Policy 1: Recognising the benefits of the National Grid;
- Policy 2: Recognising and providing for the effective operation, maintenance, upgrading and development of the National Grid;
- Policies 3 to 5: Weighing the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;

² Resource Management (Forms, Fees, and Procedure) Amendment Regulations (No 2) 2006

- Policies 10 and 11: Managing adverse effects on the National Grid and providing for “buffer corridors”;
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Section 75(3) of the RMA requires a district plan to give effect to a NPS. The Supreme Court recently considered what is meant by the phrase “give effect to” in the context of the New Zealand Coastal Policy Statement 2010 (“NZCPS”) and held that:

“Give effect to” simply means “implement”. On the face of it, it is a strong directive, creating a firm obligation on the part of those subject to it ... There is a caveat, however. The implementation of such a directive will be affected by what it relates to, that is, what must be given effect to. A requirement to give effect to a policy which is framed in a specific and unqualified way may, in a practical sense, be more prescriptive than a requirement to give effect to a policy which is worded at a higher level of abstraction.”

The Supreme Court held that the requirement to ‘give effect to’ the NZCPS is intended to constrain decision-makers. Transpower submit that this applies equally to the NPSET in the context of decisions relating to electricity transmission. Similarly, the observation that the “NZCPS is a carefully expressed document whose contents are the result of a rigorous process of formulation and evaluation. It is a document which reflects particular choices” applies to the NPSET.

Council must determine how to give effect to the NPSET, and similarly any future Hearings Panel must consider the NPSET in decisions on submissions. It is noted that the NPSET, along with further supporting documents, including an implementation guide, are available on the Ministry for the Environment website.³

Giving effect to the NPSET will ensure that:

- the National Grid is able to be safely, effectively and efficiently operated, maintained, upgraded and developed providing a reliable, safe and secure supply of electricity to the District and beyond; and
- the adverse effects of development in proximity to the National Grid are appropriately managed and are reduced, minimised or avoided depending upon the context in which the development occurs.

Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The NESETA came into effect on 14 January 2010 and sets out a national regulatory framework for activities related to existing National Grid lines, including the operation, maintenance and upgrading of such lines. The NESETA specifies permitted electricity transmission activities (subject to standards) and resource consent requirements where these activities do not meet the standards.

The NESETA only applies to the National Grid lines that existed at 14 January 2010 and does not apply to new transmission lines or substations. As with the NPSET, the NESETA does not apply to electricity distribution lines.

Under section 44A of the RMA, local authorities are required to ensure that there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The provisions of the NESETA are therefore of particular relevance to the PQLDP Stage 2.

³ <http://www.mfe.govt.nz/rma/central/transmission>

Proposed Otago Regional Policy Statement

Otago Regional Council (ORC) released its decisions on the Proposed Otago Regional Policy Statement (PRPS) on 1 October 2016. Appeals are currently outstanding. The PRPS must give effect to the NPSET under section 62(3) of the RMA whilst the PQLDP must give effect to the PRPS under section 75(3)(c) of the RMA.

Transpower's Submission

Transpower generally supports many provisions included in the PQLDP Stage 2, such as:

- those provisions that give effect to the NPSET, or are consistent with the NESETA;
- objectives and policies that recognise the importance of regionally significant infrastructure, such as the National Grid;
- objectives and policies that seek to address adverse effects on regionally significant infrastructure, such as the National Grid;
- those provisions that recognise the specific need for, and needs of, infrastructure and/or utilities; and
- the inclusion of a definition for 'regionally significant infrastructure'.

Notwithstanding this general support, Transpower's detailed submission (including the matters set out in the following table) highlights areas where provisions need to be added, amended or deleted to fully give effect to the NPSET and meet the requirements of section 32 of the RMA. Some of the requested changes are as a result of Transpower's evolving approach to the management of activities near the National Grid as it works with Councils around the country on various plan review and plan change processes to give effect to the NPSET.

Enabling National Grid Activity

While the NESETA manages and regulates transmission lines that were built before 14 January 2010, it does not manage or regulate substations. Further, the construction of new lines in the future to satisfy electricity demand and any network security or reconfiguration requirements cannot be ruled out. Therefore, the PQLDP needs to contemplate and provide an enabling framework for the development of the National Grid as a matter of national significance.

In light of Policies 1 -9 of the NPSET, which provide an enabling framework for the National Grid, the provisions of the PQLDP need to ensure:

- the sustainable management of the National Grid as a physical resource of national significance is recognised;
- the NPSET is given effect to;
- the benefits of the National Grid at a local, regional and national level are recognised;
- appropriate provision for the effective operation and maintenance of the network, including ensuring that transmission lines can be accessed as part of subdivision and development;
- that the National Grid can be upgraded and developed in order to meet network requirements such as growth in energy demand, and that there may be technical and operational requirements of the network that dictate route, site and method selection; and
- appropriate provision for the planning and development of new transmission assets.

Stage 1 Submission and Evidence

It is noted that the relief sought in this submission is consistent with, and builds on, the relief sought by Transpower's submission on Stage 1 of the PQLDP, as addressed in the expert evidence that was subsequently filed. For completeness and consistency, Transpower relies on this evidence as reasons for this submission and considers that the following forms part of Transpower's submission:

- Chapters 1 – Introduction and 5 – Tangata Whenua, Tabled Statement of Evidence of Aileen Crow dated 3 March 2016;
- Chapters 3 – Strategic Directions; 4 – Urban Development; and 6 – Landscapes, Statement of Evidence of Aileen Crow dated 29 February 2016;
- Chapters 3 – Strategic Directions; 4 – Urban Development; and 6 – Landscapes, Statement of Evidence of Andrew Renton dated 29 February 2016;
- Chapters 3 – Strategic Directions; 4 – Urban Development; and 6 – Landscapes, Legal submissions of Andrew Beatson and Natasha Garvan dated 16 March 2016;
- Chapters 21 – Rural; 23 – Gibbston Character Zone; and 33 – Indigenous Vegetation and Biodiversity - Statement of Evidence of Aileen Crow dated 21 April 2016;
- Chapters 21 – Rural; 23 – Gibbston Character Zone; and 33 – Indigenous Vegetation and Biodiversity - Statement of Evidence of Andrew Renton dated 21 April 2016;
- Chapters 21 – Rural; 23 – Gibbston Character Zone; and 33 – Indigenous Vegetation and Biodiversity – Legal submissions of Andrew Beatson and Natasha Garvan dated 24 May 2016;
- Chapter 27 – Subdivision – Statement of Evidence of Ainsley McLeod dated 15 July 2016;
- Chapter 30 – Energy and Utilities, Statement of Evidence of Ainsley McLeod dated 2 September 2016;
- Chapter 30 – Energy and Utilities, Statement of Evidence of Andrew Renton dated 2 September 2016; and
- Chapter 2 – Definitions, Correspondence from Jess Bould, dated 8 March 2017.

Conclusion

In summary, Transpower's submission generally seeks the following:

- amendments to provisions to protect the National Grid from adverse effects, including reverse sensitivity effects. This would give effect to Policies 10 and 11 of the NPSET;
- amendments to provisions to reflect the approach in Policy 8 of the NPSET in seeking to avoid areas of high amenity rather than avoiding in all instances;
- amendments to better describe the relationship between the earthworks rules and the NESETA; and
- clarification of the earthworks definition and what this includes or excludes.

Transpower New Zealand Limited seeks the following decision from the local authority:

Amend the PQLDP Stage 2 to make all required changes, including the specific amendments set out in the following table; and such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

Transpower wishes **to be heard in support of its submission.**

Due to the specific interests of Transpower in the context of the National Grid, Transpower will not consider presenting a joint case with others at a hearing.



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

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Transpower New Zealand Limited: Submission on the Proposed Queenstown Lakes District Plan – Stage 2, Decisions Sought

The following table sets out the decisions sought by Transpower, including specific amendments to the provisions of the PQLDP Stage 2 and further reasons for these amendments. These amendments are shown in [red](#).

PQLDP Provision	Support / Oppose	Submission / Reasons	Decision Sought
Chapter 24: Wakatipu Basin			
Objective 24.2.4	Support in part	Transpower supports Objective 24.2.4 to the extent that the Objective recognises the relationship between subdivision and development and infrastructure. However, Transpower seeks an amendment to the Objective to ensure that subdivision and land use development in the Wakatipu Basin Rural Amenity Zone does not compromise Transpower's existing Cromwell – Frankton A 110kV overhead transmission line. This amendment is necessary to give effect to Policy 10 of the NPSET.	Amend Objective 24.2.4 as follows: “Subdivision and land use development maintains and enhances water quality, ecological quality, and recreation values while ensuring the efficient provision of infrastructure and the protection of the National Grid .”
Policy 24.2.4.6	Support in part	Transpower generally supports Policy 24.2.4.6 because it recognises that regionally significant infrastructure, such as the National Grid, has functional and locational constraints associated with it. This goes some way to giving effect to Policy 3 of the NPSET. However, the NPSET policy approach, in Policy 8, is to “seek to avoid” areas of high amenity, rather than “maintaining” landscape character and visual amenity values. Transpower therefore seeks amendments to Policy 24.2.4.6 to recognise the national significance of the National Grid and the fact that it may not always be possible for regionally significant infrastructure to maintain landscape character and visual amenity values. The amendments proposed are necessary to properly give effect to Policies 3 and 8 of the NPSET.	Amend Policy 24.2.4.6 as follows: “Ensure that other utilities including regionally significant infrastructure are located and operated to avoid, remedy or mitigate potential adverse effects on the maintain landscape character and visual amenity values, having regard to the important functional, and locational and technical constraints of these activities.”
Section 24.3.2 - New Advice Note	Support	Transpower seeks that a new advice note be included within Chapter 24 that directs users of the plan to Chapter 30: Energy and Utilities in relation to earthworks, buildings, structures and National Grid sensitive activities undertaken within the National Grid Yard. The proposed advice note is consistent with the notified wording in both Standard 25.3.3.11 within Chapter 25: Earthworks and Advice Note 38.8.2.8 of Chapter 38: Open Space and Recreation.	Add a new Advice Note as follows: “ The following activities are managed in Chapter 30 Energy and Utilities: a. Earthworks, buildings, structures and National Grid sensitive activities undertaken within the National Grid Yard; b. Earthworks for the placement of underground electricity cables or lines; and c. Earthworks in the Electricity Distribution Corridor. ”

PQLDP Provision	Support / Oppose	Submission / Reasons	Decision Sought
Schedule 24.8: 18 – Morven Eastern ‘Foothills’	Support in part	<p>Transpower supports the description on the Morven Eastern Foothills area as it provides an overall description of the existing environment and potential opportunities and constraints for further development of the area.</p> <p>However, Transpower considers that within the section titled ‘Potential landscape issues and constraints associated with additional development’, the presence and close proximity of the National Grid within this area should be stated as this needs to be identified as a potential constraint to further development in the area. Transpower notes that other areas include infrastructure as constraints such as airport noise buffer and proximity of popular walkway / cycleway route.</p>	<p>Amend the section ‘Potential landscape issues and constraints associated with additional development’ to include:</p> <p>“Close proximity to Transpower’s National Grid - Cromwell – Frankton A (CML-FKN-A) 110kV overhead transmission line.”</p>
Schedule 24.8: 25 – Shotover Country Margins	Support in part	<p>Transpower supports the description on the Shotover Country Margins area as it provides an overall description of the existing environment and potential opportunities and constraints for further development of the area.</p> <p>However, Transpower considers that within the section titled ‘Potential landscape issues and constraints associated with additional development’, the presence and close proximity of the National Grid within this area should be stated as this needs to be identified as a potential constraint to further development in the area. Transpower notes that other areas include infrastructure as constraints such as airport noise buffer and proximity of popular walkway / cycleway route.</p>	<p>Amend the section ‘Potential landscape issues and constraints associated with additional development’ to include:</p> <p>“Close proximity to Transpower’s National Grid - Cromwell – Frankton A (CML-FKN-A) 110kV overhead transmission line.”</p>
Chapter 25: Earthworks			
Section 25.1: Purpose	Support in part	<p>Transpower generally supports Section 25.1 as it recognises that earthworks are important for the continued use and development of rural and urban land, and an integral part of the development and maintenance of infrastructure. However, as the ‘Purpose’ statement has a role in setting out the broad approach of, and context for, the provisions that follow in Chapter 25, Transpower considers that it requires amendment to be consistent with the terminology used in the NPSET. The proposed amendments will also ensure components of infrastructure use and development are captured.</p>	<p>Amend Section 25.1 as follows:</p> <p>“Earthworks are often a necessary component of the use and development of rural and urban land, and are often an integral part of the installation development, operation and maintenance and upgrading of infrastructure.”</p>

PQLDP Provision	Support / Oppose	Submission / Reasons	Decision Sought
Policy 25.2.2.1	Support	Transpower supports Policy 25.2.2.1 as it not only recognises the necessity of earthworks for the wellbeing of people and the community, but it also recognises the importance of Nationally and Regionally Significant Infrastructure, such as the National Grid. The Policy, as notified, gives effect to the Objective and Policy 1 of the NPSET.	Retain Policy 25.2.2.1 as notified.
Policy 25.2.2.2	Support	Transpower generally supports Policy 25.2.2.2 as it aims to ensure that earthworks do not adversely affect infrastructure, such as the National Grid, thereby giving effect to Policy 10 of the NPSET.	Retain Policy 25.2.2.2 as notified.
Advice Note 25.3.3.10	Support	Transpower supports Advice Note 25.3.3.10 as it establishes the role of the NESETA as it relates to existing transmission lines and earthworks. That said, Transpower is concerned that the Advice Note does not clearly state that the NESETA only relates to operation, maintenance, upgrading, relocation or removal of National Grid transmission line(s) that were operating or able to be operated on, or prior to, 14 January 2010 and remain part of the National Grid. However, given the direction provided in Chapter 30: Energy and Utilities, Transpower considers that the Advice Note adequately sets out the role of the NESETA, therefore reflecting sections 43B and 44A of the RMA and Regulation 4 of the NESETA.	Retain Advice Note 25.3.3.10 as notified.
Advice Note 25.3.3.11	Support	Transpower supports the wording in Advice Note 25.3.3.11 as it directs users of the plan to Chapter 30: Energy and Utilities in relation to earthworks undertaken within the National Grid Yard as well as earthworks undertaken for the placement of underground electricity cables or lines. In this regard, Transpower's support is on the basis that the exemptions in the General Rules in 25.3.4 do not apply to the Chapter 30 provisions for earthworks in the National Grid Yard.	Retain Advice Note 25.3.3.11 as notified.
25.3.4.5 General Rules	Support	Transpower supports Rule 25.3.4.5(n)(i) as it states that earthworks where the NESETA prevail are exempt from the earthworks rules contained in Tables 25.1 to 25.3.	Retain Rule 25.3.4.5 (n) (i) as notified.
Definition – Earthworks	Support	Transpower generally supports the altered definition of earthworks to the extent that it is consistent with the relief sought by Transpower as part of the PQLDP Stage 1 process where	Amend the definition of 'Earthworks' as follows: "Means the disturbance of land surfaces by the removal or <u>deposition on or change to the profile of</u>

PQLDP Provision	Support / Oppose	Submission / Reasons	Decision Sought
		<p>Transpower sought that the definition of earthworks not exclude 'the cultivation of land, digging of holes for ofal pits and the erection of posts or poles or the planting of trees'. These activities have not been excluded in the definition of the earthworks, which Transpower supports as these are activities that should be subject to the National Grid corridor rules rather than exempt from them.</p> <p>Transpower seeks a minor amendment to include the deposition and removal of 'rock or soil' as well as cleanfill to ensure that these activities are clearly captured within the definition.</p>	<p><u>land.</u></p> <p><u>Earthworks includes excavation, filling, cuts, root raking and blading, firebreaks, batters and the formation of roads, access, driveways, tracks and the deposition and removal of cleanfill, rock or soil, depositing of material, excavation, filling or the formation of roads, banks, and tracks. Excludes the cultivation of land and the digging of holes for ofal pits and the erection of posts or poles or the planting of trees."</u></p>
New definition – Regionally Significant Infrastructure	Support	<p>Transpower supports the proposed definition for Regionally Significant Infrastructure to the extent that it includes 'electricity transmission infrastructure forming the National Grid'. The proposed definition not only gives effect to the NPSET and the Proposed Otago Regional Policy Statement (specifically Policy 3.5.1), but the proposed wording also reflects the definition that was proposed by Transpower in our original submission on the QLDP Stage 1 (dated 23 October 2015).</p>	Retain the definition for Regionally Significant Infrastructure as notified.
Chapter 29: Transport			
Rule 29.3.3.5	Support	<p>Transpower supports General Rule 29.3.3.5 because the Rule makes it clear that activities within roads are still subject to the district-wide provisions that apply to all land within the district, such as the rules within Chapter 30: Energy and Utilities that relate to activities undertaken within the National Grid Yard.</p> <p>Activities within roads should be subject to the National Grid corridor rules that were set out in Transpower's original submission on Stage 1 of the PQLDP in order to protect the National Grid from potentially adverse effects, and to give effect to Policy 10 of the NPSET.</p>	Retain Rule 29.3.3.5 as notified.
Chapter 38: Open Space and Recreation			
Advice Note 38.8.2.8	Support in part	<p>Transpower supports the advice note as it directs users of the plan to Chapter 30: Energy and Utilities in relation to earthworks undertaken within the National Grid Yard as well as earthworks undertaken for the placement of underground electricity cables or lines.</p> <p>However, Transpower considers that amendments to clause a) are required in order to make it clear that it is not only earthworks</p>	<p>Amend Advice Note 38.8.2.8 as follows:</p> <p>"The following activities are managed in Chapter 30 Energy and Utilities:</p> <ol style="list-style-type: none"> a. Earthworks, <u>buildings, structures and National Grid sensitive activities</u> undertaken within the National Grid Yard; b. Earthworks for the placement of

PQLDP Provision	Support / Oppose	Submission / Reasons	Decision Sought
		<p>within the National Grid Yard that would direct plan users to Chapter 30, but also buildings, structures and National Grid sensitive activities. In addition, Transpower's proposed amendments ensure consistency with the notified wording in Standard 25.3.3.11 within Chapter 25: Earthworks.</p>	<p>underground electricity cables or lines; and c. Earthworks in the Electricity Distribution Corridor."</p>
Stage 2 Planning Maps			
<p>Stage 2 Planning Maps - notes</p>	Support	<p>The notes on the Stage 1 Planning Maps make it clear that the annotations notified in the Stage 1 planning maps, such as the identified National Grid transmission lines, support structures and substation, apply to both Stage 1 and Stage 2. Transpower's submission on the Stage 1 Planning Maps therefore applies to the Stage 2 Planning Maps.</p> <p>Transpower assumes that the Stage 1 and 2 planning maps will be combined when the decisions are released on the PQLDP, therefore the Stage 2 planning maps will eventually contain the identification of the National Grid transmission lines, support structures and substation.</p> <p>Policy 12 of the NPSET requires that the National Grid be identified on Planning Maps.</p>	<p>Retain the Stage 2 Planning Maps as notified.</p>

