

**Appendix B – Further Submission by Transpower New Zealand Limited**

**Proposed Queenstown Lakes District Plan – 18 December 2015**

# Further Submission by Transpower New Zealand Limited

## Proposed Queenstown Lakes District Plan

18 December 2015

*Keeping the energy flowing*



## **Further submission by Transpower New Zealand Ltd on the Proposed Queenstown Lakes District Plan**

**To** Queenstown Lakes District 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 the Proposed Queenstown Lakes District Plan (Proposed Plan).**

Transpower is making this further submission (refer attached table) in accordance with Clause 6, Schedule 1 of the Resource Management Act 1991.

Transpower has an interest in the Proposed Plan 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/or
- 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

Transport is supportive of the submissions identified in Schedule 1 insofar as they are generally consistent with the outcomes sought in its original submissions, including 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;
- Recognise the National Grid as a physical resource of national importance and the need to enable its safe, effective and efficient operation, maintenance, upgrade and development;
- Are the most appropriate means of exercising Councils functions in respect of section 32 of the RMA, and
- Enable the protection of Transpower's infrastructure and operations in the Queenstown Lakes District.

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

Transport opposes the submissions identified in Schedule 1 to the extent they are generally inconsistent with, and fail to achieve, the outcomes sought in its original submissions, and 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.**

**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.**

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

**Date:** 18 December 2015

## Schedule 1: Transpower New Zealand Limited – Further Submission

Submitter	Proposed Plan Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
<b>Chapter 2 - Definitions</b>				
Aurora Energy Limited (635.1)	<p>Seeks a new definition of 'Critical Electricity Line' as follows:</p> <p><i><u>"Electrical lines throughout the region that are not covered by National Policy Statement on Electricity Transmission and that are or have the potential to be crucial to the region's quality, reliability and security of electrical supply. These electricity lines are crucial because they contribute to the social and economic wellbeing and health and safety of the region and are lines that:</u></i></p> <p><i><u>Supply essential public services; or</u></i></p> <p><i><u>Supply large industrial or commercial electricity consumers; or</u></i></p> <p><i><u>Supply high number of consumers; or</u></i></p> <p><i><u>Are difficult to replace with an alternative electricity supply if they are compromised.</u></i></p> <p><i><u>Specified distances from Critical Electricity Lines are to be measured from a point directly below the centerline of the line or cluster of lines, as shown in Fig 1 below.</u></i></p> <p><i><u>Fig 1 [see original submission]</u></i></p> <p><i><u>While only critical electricity lines are identified on the planning maps, works in close proximity to all electric lines can be dangerous. Compliance with NZECP 34:2001 as amended from time to time is mandatory for buildings, earthworks, and when using machinery or equipment within close proximity to any electric lines."</u></i></p>	Neutral, but oppose terminology	<p>Transpower does not support nor oppose Aurora's submission that the Proposed Plan should recognise and protect the electricity distribution network. However, Aurora's submission seeks that the Proposed Plan includes both a 'critical electricity line corridor', which excludes the National Grid, and an 'electricity distribution line corridor'.</p> <p>Transpower understands that Aurora is trying to differentiate between strategic electricity distribution lines (critical electricity lines) and the rest of the electricity distribution network. However, providing two protection corridors for the electricity distribution network, particularly when there is also a protection corridor / yard for the National Grid, is unnecessary and may be confusing to users of the plan, particularly when a 'critical electricity line' does not include the National Grid, which is critical not only for the Queenstown Lakes District but also the entire country.</p> <p>Transpower therefore seeks that Council does not use the term 'critical electricity lines' within the Proposed Plan. If Council accepts the relief sought in Aurora's submission, Transpower suggests that protection of strategic electricity distribution lines is provided by way of an 'electricity distribution line corridor'. This would encompass a definition, which Transpower has drafted and provided further in this document, identification on the planning maps and specific provisions separate from the National Grid provisions.</p> <p>The remainder of the electricity distribution network would be covered under the 'electricity distribution'</p>	<b>Disallow the term 'critical electricity line' and if Council accepts Aurora's relief sought, amend Aurora's proposed definition for 'electricity line distribution corridor' and the associated definitions, rules and maps, as per the relief sought by Transpower below</b>

			<p>definition proposed by Aurora, with protection provided by way of compliance with NZECP 34:2001, as stated in Aurora's submission.</p> <p>This approach, including the proposed terminology, is consistent with that provided in the Proposed Otago RPS and other District Plans throughout New Zealand.</p>	
Aurora Energy Limited (635.3)	<p>Seeks a new definition for 'Electricity Distribution' as follows:</p> <p><i><u>"Means the conveyance of electricity via electricity distribution lines, cables, support structures, substations, transformers, switching stations, kiosks, cabinets and ancillary buildings and structures, including communication equipment, by a network utility operator. For the avoidance of doubt, this includes, but is not limited to Aurora Energy Limited assets shown on the planning maps."</u></i></p>	Support	<p>Transpower supports the inclusion of an 'electricity distribution' definition as this will ensure that users of the plan easily understand the difference between the electricity distribution network and the National Grid. The term is consistent with the Proposed Otago RPS as well as other District Plans throughout New Zealand.</p>	<b>Allow</b>
Aurora Energy Limited (635.4)	<p>Seeks a new definition for "Electricity Distribution Line Corridor" as follows:</p> <p><i><u>"Means a buffer area around electricity distribution lines, support structures and substations operated by a network utility operator. For the avoidance of doubt, this applies to Aurora Energy Limited's assets shown on the planning maps."</u></i></p>	Neutral, but oppose terminology	<p>As stated earlier, Transpower does not support nor oppose Aurora's submission that the Proposed Plan should recognise and protect the electricity distribution network. However, Transpower does not support the inclusion of the term 'critical electricity line' for the reasons stated above. If Council accepts Aurora's relief sought, Transpower suggests that Council provides protection of Aurora's strategic assets by way of the 'electricity distribution line corridor' definition proposed by Aurora.</p> <p>Transpower has therefore suggested amendments to this definition to ensure it is a 'corridor' definition that will provide protection of strategic electricity distribution lines from adverse effects, including reverse sensitivity effects.</p> <p><i><u>"Electricity Distribution Line Corridor"</u></i>  <i><u>Means a buffer area around electricity distribution lines, support structures and substations that are or have the potential to be crucial to the region's quality, reliability</u></i></p>	<b>Allow</b> , but amend the definition as per the relief sought by Transpower

			<p><del>and security of electrical supply, operated by a network utility operator. For the avoidance of doubt, this applies to Aurora Energy Limited's assets shown on the planning maps.</del></p> <p><del>Specified distances from the Electricity Distribution Line Corridor are to be measured from a point directly below the centerline of the electricity distribution line or cluster of lines, as shown in Fig 1 below.</del></p> <p><del>Fig 1 [see original submission]</del></p> <p><del>While only the electricity distribution line corridor is identified on the planning maps, works in close proximity to all electric lines can be dangerous. Compliance with NZECP 34:2001 as amended from time to time is mandatory for buildings, earthworks, and when using machinery or equipment within close proximity to any electric lines."</del></p>	
Aurora Energy Limited (635.5)	<p>Seeks the following amendments to the definition of "Minor Upgrading":</p> <p><u><i>"means an increase in the carrying capacity, efficiency or security of transmission and distribution lines utilising the existing support structures or structures of a similar scale, intensity and character and includes:</i></u></p> <ul style="list-style-type: none"> <li>- <u><i>Addition of a single service support structure for the purpose of providing a service connection to a site, except in the Rural zone;</i></u></li> <li>- <u><i>The addition of up to three-four new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone;</i></u></li> <li>- <u><i>Replacement of conductors or lines provided they do not exceed 30mm in diameter or the bundling together of any wire, cable or similar conductor provided that the bundle does not exceed 30mm in diameter;</i></u></li> <li>- <u><i>Re-sagging of existing lines;</i></u></li> <li>- <u><i>Replacement of insulators provided they are less or similar in length; and</i></u></li> <li>- <u><i>Addition of lightning rods, earth-peaks and earth-wires.</i></u></li> </ul>	Support in part	<p>Transpower generally support Aurora's submission as the proposed amendments are very similar to Transpower's proposed submission. Transpower agrees with Aurora that the focus of the definition is unduly restrictive and should be widened to ensure that activities associated with routine maintenance are not unnecessarily restricted by the requirement to obtain resource consent.</p> <p>Transpower seeks Council accept Transpower's original submission as it is consistent with the NPSET and NESETA and has been used in other District Plans throughout New Zealand.</p>	<b>Allow</b> , subject to the relief sought in Transpower's original submission

	<ul style="list-style-type: none"> <li>- <u>The addition of circuits and conductors.</u></li> <li>- <u>The re-conducting of the line with higher capacity conductors.</u></li> <li>- <u>The re-sagging of conductors.</u></li> <li>- <u>The bonding of conductors.</u></li> <li>- <u>The addition of longer or more efficient insulators.</u></li> <li>- <u>The addition of earth wires that may contain telecommunication lines, earth peaks and lightning rods.</u></li> <li>- <u>Support structure replacement within the same or immediately adjacent location within the existing alignment of the distribution corridor.</u></li> <li>- <u>The replacement of existing cross-arms with cross-arms of an alternative design.</u></li> <li>- <u>An increase in support structure height required to comply with the New Zealand Electrical Code of Practice 34:2001 by not more than 15% of the base height of the support structure and where the base height is defined as the height of the structure at date of public notification of the District Plan.”</u></li> </ul>			
Vodafone NZ (179.5) and Spark Trading NZ Limited (191.4)	<p>Seeks the following amendments to the definition of “Minor Upgrading”:</p> <ul style="list-style-type: none"> <li>“- <i>Addition of a single service support structure for the purpose of providing a service connection to a site, except in the Rural zone;</i></li> <li>- <i>The addition of up to three new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone;</i></li> <li>- <i>Replacement of conductors or lines provided they do not exceed 30mm in diameter or the bundling together of any wire, cable or similar conductor provided that the bundle does not exceed 30mm in diameter;</i></li> <li>- <i>Re-sagging of existing lines;</i></li> <li>- <i>Replacement of insulators provided they are less or similar in length; and</i></li> <li>- <i>Addition of lightning rods, earth peaks and earth-wires.</i></li> </ul>	Support in part	<p>The definition, as drafted in the Proposed Plan, appears to only relate to the electricity transmission and distribution networks rather than all network utilities. Transpower seeks that the definition remains focussed on electricity transmission and distribution activities as this is consistent with the NPSET, NESETA and other District Plans. In addition, restricting the definition to electricity transmission and distribution activities will ensure consistency with the relevant rules.</p> <p>However, Transpower does support the submitters’ amendments to the extent that they are seeking greater clarity and enablement of minor upgrading.</p> <p>If Council accepts the relief sought by the submitters, Transpower suggests that Council provides a new definition for telecommunication activities based these submissions. Transpower seeks that Council accept Transpower’s original relief sought in regards to the</p>	<p><b>Allow</b>, but provide the relief sought via a new definition for telecommunications activities, and amend ‘minor upgrading’ as per the relief sought in Transpower’s original submission</p>



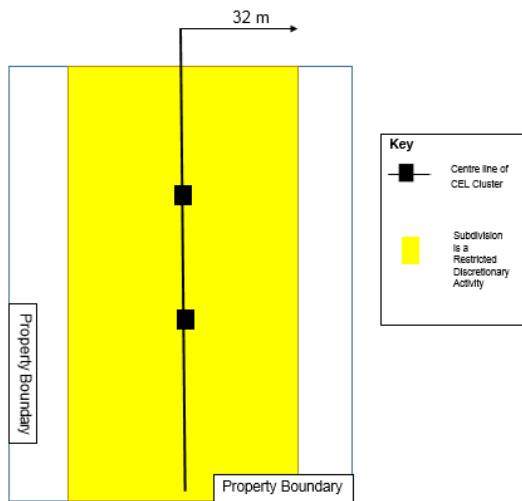
	<p><u>- An increase by no more than 30% in any dimension for utility poles, structures, or cabinets or antenna.</u></p> <p><u>- Addition of lines and ancillary equipment to existing poles.”</u></p>		'minor upgrading' definition.	
Aurora Energy Limited (635.6)	<p>Seeks a new definition for “Regionally Significant Infrastructure as follows:</p> <p><u>“Regionally significant infrastructure is:</u></p> <p><u>(1) Strategic land transport network and arterial roads</u></p> <p><u>(2) Queenstown Airport</u></p> <p><u>(3) Wanaka Airport</u></p> <p><u>(4) Telecommunication facilities</u></p> <p><u>(5) Electricity generation, transmission and distribution networks</u></p> <p><u>(6) Sewage collection, treatment and disposal networks</u></p> <p><u>(7) Community land drainage infrastructure</u></p> <p><u>(8) Community potable water systems</u></p> <p><u>(9) Established community-scale irrigation and stockwater infrastructure</u></p> <p><u>(10) Transport hubs</u></p> <p><u>(11) Bulk fuel supply infrastructure including terminals, wharf lines and pipelines.</u></p> <p><u>(12) Life line utilities as defined in the Civil Defence and Emergency Management Act.”</u></p>	Support in part	<p>Transpower supports Aurora’s submission but seeks that the three stages of electricity supply, being generation, transmission and distribution, be separate within the definition, as requested in Transpower’s original submission. Transpower’s proposed definition is consistent with Policy 3.5.1 of the Proposed Otago RPS.</p> <p>In addition, Transpower seeks that the definition better reflect the regionally significant infrastructure located within the District, which does not include bulk fuel supply infrastructure. Transpower also notes that the term ‘transport hubs’ are not used within the Proposed Otago RPS or the Proposed Plan.</p> <p>In order to ensure consistency with the Proposed Otago RPS whilst also tailoring the definition to the regionally significant infrastructure located within the District, Transpower seeks Council accept the definition proposed in Transpower’s original submission.</p>	<b>Allow</b> , subject to the relief sought in Transpower’s original submission
Aurora Energy Limited (635.9)	<p>Seeks the following amendments to the definition of “Utility”:</p> <p><u>“Means the systems, services, structures and networks necessary for operating and supplying essential utilities and services to the community including but not limited to:</u></p> <p><u>- substations, transformers, lines and necessary and incidental structures and equipment for the transmission and distribution of electricity;</u></p> <p>....</p> <p><u>Utility does not include structures or facilities used for</u></p>	Support	<p>Transpower supports Aurora’s submission and considers that substations should be provided for within the ambit of the definition as they are a key aspect of the electricity transmission and distribution networks. However, Transpower also seeks Council accept Transpower’s original relief sought in relation to this definition.</p>	<b>Allow</b> , subject to the relief sought in Transpower’s original submission

	<i>electricity generation (excluding temporary emergency generators), the manufacture and storage of gas, or the treatment of sewage.”</i>			
Aurora Energy Limited (635.7)	Seeks a new definition for “Support Structure” as follows:  <i>“Means a utility pole or tower that forms part of the electricity distribution network or National Grid that supports conductors as part of an electricity distribution line or transmission line. This includes any ancillary equipment, such as communication equipment or transformers, used in the conveyance of electricity.”</i>	Support	Transpower supports the inclusion of a definition for support structures as the term is referred to within other definitions of the Proposed Plan, such as the definition for ‘minor upgrading’. Transpower seeks minor amendments to the definition to ensure that all poles and towers, irrespective of its physical construction, is included (i.e. a steel monopole that is part of the National Grid).	<b>Allow</b> , subject to the following amendments:  <i>“Means a utility pole or tower, <u>irrespective of its physical construction</u>, that forms part of the electricity distribution network or National Grid ...</i>

### Chapter 3 – Strategic Direction

Aurora Energy Limited (635.15)	Seeks the following amendment to Policy 3.2.4.6.1:  <i>“That subdivision and / or development be designed so as to: a. avoid <u>significant</u> adverse effects on the water quality of lakes, rivers and wetlands in the District, <u>where it is practicable to do so</u>; and b. <u>avoid, remedy or mitigate other adverse effects on the water quality of lakes, rivers and wetlands in the District.</u>”</i>	Support	Transpower supports the proposed amendments as they are consistent with the recent King Salmon Case where the Court stated that the word ‘avoid’ means ‘not allowing’ or ‘preventing the occurrence of’. In this instance, this policy would not allow any adverse effects on the water quality of lakes, rivers or wetlands in the District, even if it is temporary.  The proposed wording is also not consistent with section 6 of the RMA which aims to protect wetlands, lakes and rivers from inappropriate subdivision, use and development.	<b>Allow</b>
Aurora Energy Limited (635.16 and 635.17)	Seeks the inclusion of the following new Objective and Policy under 3.2.5 Goal – Our distinctive landscapes are protected from inappropriate development:  <b><u>“Objective xxxx</u></b> <i><u>Recognise that Regionally Significant Infrastructure has specific location and technical constraints.</u></i>  <b><u>Insert New Policy xxx</u></b>	Support in part	Transpower supports Aurora’s submission to include an additional objective and policy for regionally significant infrastructure as the proposed provisions are consistent with Policies 3.5.1 and 3.5.2 of the Proposed Otago RPS. The proposed provisions will also give effect to Policies 1 and 3 of the NPSET.  Transpower seeks minor amendments to the proposed provisions to ensure consistency with the NPSET and the Proposed Otago RPS.	<b>Allow</b> , subject to the following further amendments:  <b><u>“Objective xxxx</u></b> <i><u>Recognise that Regionally Significant Infrastructure has specific locational,</u></i>

	<u>Manage potential effects of Regionally Significant Infrastructure on the surrounding environment, having regard to the economic benefits and technical and operational needs of such infrastructure.”</u>			<del>and technical, and operational constraints.</del> <b>Insert New Policy xxx</b> <i>Manage potential effects of Regionally Significant Infrastructure on the surrounding environment, having regard to the economic benefits and locational, technical and operational requirements needs of such infrastructure.”</i>
Aurora Energy Limited (635.42)	<p>Insert a New Rule as follows:</p> <p><u>Rule xxx</u> <u>Restricted Discretionary Activity - Subdivision</u> <u>1. Subdivision within 32m of the centre line of a Critical Electricity Line, or within 32m from the designation boundary of a substation shall be a restricted discretionary activity.</u></p>	Neutral, but oppose terminology	<p>As stated earlier, Transpower does not oppose nor support Aurora’s submission that the Proposed Plan should recognise and protect the electricity distribution network.</p> <p>However, Transpower seeks that the terminology used within the Proposed Plan is consistent with the Proposed Otago RPS and other District Plans throughout New Zealand.</p> <p>For these reasons, if Council accepts the relief sought in Aurora’s submission, Transpower suggests that Council provides a protection corridor for Aurora’s network by using the term ‘electricity distribution line corridor’, as described earlier. Transpower does not generally oppose the new rule proposed by Aurora, but seeks the terminology be altered to ‘electricity distribution line corridor’, if Council accepts the relief sought by Aurora.</p>	<b>Allow, subject to Transpower’s relief to delete the term ‘critical electricity line’ and instead use the term ‘electricity distribution line corridor’</b>



Classification of Subdivision in Vicinity of Critical Electricity Lines

When considering any restricted discretionary activity under Rule xxx, discretion will be restricted to:

the safe and efficient operation and maintenance of the electricity supply network, including:

The use, design and location of buildings; and

The mature size, growth rate, location, and fall zone of any associated tree planting, including landscape planting and shelterbelts; and

Compliance with NZECP 34:2001; and

Effects on public health and safety; and

Effects on access to CEL's, designated substations and associated infrastructure for maintenance purposes.

For restricted discretionary activities under Rule xxx the relevant network utility operator will be considered an affected party under s 95E of the Resource Management Act, 1991.

Chapter 30 – Energy and Utilities				
Aurora Energy Limited (635.51)	<p>Seeks the following amendments to Policy 30.2.6.4:</p> <p><i>“Provide for the sustainable, secure and efficient use and development of the electricity transmission <u>and distribution</u> networks, including within the transmission line corridor, the Critical Electricity Line corridor, and to protect activities from the adverse effects of the electricity transmission and <u>distribution</u> networks, including by:</i></p> <ul style="list-style-type: none"> <li>• <i>Controlling the proximity of buildings, structures and vegetation to existing transmission <u>and Critical Electricity Line corridors</u></i></li> <li>• <i>Discouraging sensitive activities from locating within or near to the electricity transmission National Grid Yard to minimise potential reverse sensitivity effects on the transmission network</i></li> <li>• <i>Managing subdivision within or near to electricity transmission <u>and Critical Electricity Line corridors</u> to achieve the outcomes of this policy to facilitate good amenity and urban design outcomes</i></li> <li>• <i>Not compromising the operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.”</i></li> </ul>	Neutral, but oppose terminology	<p>As stated earlier, Transpower does not oppose nor support Aurora’s submission that the Proposed Plan should recognise and protect the electricity distribution network.</p> <p>However, if Council accepts the relief sought in Aurora’s submission, Transpower suggests that to avoid confusion and duplication, Council use the term ‘electricity distribution line corridor’ rather than the term ‘critical electricity line corridor’. In addition, Transpower seeks that protection of the electricity distribution network is separate from protection provided to the National Grid, particularly as the National Grid is afforded special protection under the NPSET.</p> <p>Transpower therefore seeks different, individual policies for the two corridors, if Council accepts the relief sought in Aurora’s submission.</p>	<b>Disallow</b> , and if Council accepts Aurora’s submission, insert a new policy for the electricity distribution line corridor
Aurora Energy Limited (635.61)	<p>Seeks the following amendment to Rule 30.4.10:</p> <p><i>“Buildings (that are not for National Grid Sensitive Activities), Structures and Earthworks within National Grid <u>and Critical Electricity Lines</u> Corridors (subject to compliance with Rules 30.5.10, and 30.5.11 <u>and Rule xxxx relating specifically to Critical Electricity Lines.</u>)”</i></p>	Oppose in part	<p>As stated above, Transpower seeks the deletion of ‘critical electricity lines’ within the Proposed Plan and if Council accepts Aurora’s relief sought, Transpower seeks the term be replaced with ‘electricity line distribution corridor’.</p> <p>In terms of Rule 30.4.10, Transpower oppose Aurora’s suggested amendments as Transpower consider that the National Grid should be afforded its own rule due to the protection provided to the National Grid under the NPSET. Transpower therefore seek that Transpower’s original relief sought on Rule 30.4.10 be accepted, and if Council accepts the relief sought in Aurora’s submission, a new rule for the ‘electricity distribution</p>	<b>Disallow</b> , and if Council accept Aurora’s submission, Transpower seeks that Council insert a new rule for the electricity distribution line corridor

			line corridor' be inserted into the plan to provide protection for Aurora's strategic assets.	
Aurora Energy Limited (635.70 and 635.71)	Seeks the inclusion of new rules for Critical Electricity Lines (Land Use)  [See original submission for the proposed rules relating to land use within a critical electricity line corridor.]	Neutral, but oppose terminology	As stated earlier, Transpower does not oppose nor support Aurora's submission that the Proposed Plan should recognise and protect the electricity distribution network.  Transpower does not oppose nor support the new rules sought for the electricity distribution network, but if Council accepts the relief sought in Aurora's submission, Transpower suggests that the term 'critical electricity line' be deleted and replaced with the term 'electricity distribution line corridor'. The reasons for the relief sought have been discussed earlier in this document.	<b>Allow</b> , but if Council accepts Aurora's submission, Transpower seeks Council delete the term 'critical electricity line' and replace with the term 'electricity distribution line corridor'
Vodafone NZ (179.28); Spark Trading NZ Limited (191.26) and Chorus New Zealand Limited (781.26)	Replace all the Rules for Utilities, Buildings and Structures within National Grid Corridors with the following (except Flood Protection Rules 3.4.18 – 30.4.21 and National Grid Rules 30.4.10 – buildings and structures in National Grid Yard) – see original submission.  Seek deletion of Rules 30.4.9 (minor upgrading), 30.4.11-12 (lines and support structures), and 30.5.11 (earthworks in the National Grid Yard).	Neutral, but oppose terminology	Transpower does not oppose the inclusion of rules for other utilities, particularly telecommunication activities, as this provides additional clarity. Transpower particularly supports Vodafone's submission that the utility rules prevail over all other chapters within the District Plan.  However, Transpower seeks that Council accept Transpower's original relief sought in relation to the National Grid rules as Transpower's proposed rules are more appropriate as well as being more consistent with the NPSET and NESETA.  Transpower also seeks that proposed Rule 30.4.9 by the submitters should be deleted as it is not qualified or relative to electricity transmission.	<b>Allow</b> , subject to the relief sought in Transpower's original submission
<b>Planning Maps</b>				
Aurora Energy Limited (635.86)	Seeks the inclusion of electricity distribution lines that fall within the proposed Critical Electricity Lines definition on the District Planning Maps	Neutral, but oppose terminology	As stated earlier, if Council accepts Aurora's submission regarding a protection corridor, Transpower seeks that the term 'critical electricity lines' within the District Plan be deleted and replaced with the term 'electricity distribution line corridor'. This would ensure consistency with the Proposed Otago RPS and other District Plans throughout New Zealand.	<b>Allow</b> , but delete the term in the legend 'subtransmission lines' and instead refer to the lines as 'electricity distribution line'

		<p>Transpower supports the identification of the electricity distribution line corridor on the planning maps but considers the proposed label of 'subtransmission lines' to be misleading and confusing as electricity transmission lines are referred to as the National Grid and thus afforded special protection under the NPSET.</p>	<p>corridor'</p>
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