



Closing
date for further
submissions:
Friday 29 October
2021

Further Submission Form In support of, or in opposition to, submission/s on the
Central Hawkes District Proposed District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

To submit electronically please go to: www.chbdc.govt.nz/districtplanreview

1. Further Submitter details: (mandatory information)		
Full name of individual/organisation making further submission:	Transpower New Zealand Limited	
Contact person (if different from above):	Rebecca Eng	
Email address for service:	Environment.Policy@transpower.co.nz	
Postal address for service:	PO Box 17215, Greenlane, Auckland	
Preferred method of contact:	<input checked="" type="checkbox"/> Email <input type="checkbox"/> Post	Postcode 1546
Phone numbers:	Daytime 09 590 7072	Mobile
2. Eligibility to make a further submission: (for information on this section go to RMA Schedule 1, clause 8)		
I am:	<input type="checkbox"/> A person representing a relevant aspect of the public interest; In this case, also specify below the grounds for saying that you come within this category; or <input checked="" type="checkbox"/> A person who has an interest in the proposal greater than the interest that the general public has. In this case, also specify below the grounds for saying that you come within this category; or	
My reasons for selecting the category ticked above are:		
Transpower NZ Ltd is the owner and operator of the National Grid. The need to operate, maintain, develop and upgrade the National Grid is identified as a matter of national significance under the National Policy Statement on Electricity Transmission 2008. Transpower also has an interest as a landowner and occupier.		
3. Request to be heard at a hearing		
<input checked="" type="checkbox"/> Yes, I wish to be heard at the hearing in support of my further submission; or		
<input type="checkbox"/> No, I do not wish to be heard at the hearing in support of my further submission		
4. Joint submission		
If others make a similar submission, I will consider presenting a joint case with them at the hearing <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5. Joint submission		
<input checked="" type="checkbox"/> I have filled in the table on the next page with details of my further submission.		
<input checked="" type="checkbox"/> I have added <u>21</u> further pages/sheets that form part of my further submission.		
<input checked="" type="checkbox"/> I understand that I am responsible for serving a copy of my further submission on the original submitter(s) within 5 working days after it is served on Council.		
6. Joint submission (a signature is not required if you make your submission by electronic means)		
Signature of further submitter (or person authorised to sign on their behalf)		
Signature: (type name if submitting electronically)	Date: 9 November 2021	

7. Return this form no later than 5pm Friday 29 October 2021 by:

- Delivery to Central Hawkes Bay District Council office on Ruataniwha Street Waipawa or the Waipawa Library
- Post to Central Hawkes District Council, 28/32 Ruataniwha Street, Waipawa 4210
- Email to districtplan@chbdc.govt.nz

2. Important notes to person making a further submission:

A. Content of further submission

A further submission must be limited to a matter in support of, or in opposition to, an original submission. A further submission cannot introduce new matters that were not raised in original submissions.

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least one of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the further submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

B. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on Council (See table on following page).

C. Privacy Information

Council will make all further submissions, including name and contact details, publicly available on Council's website. Personal information will also be used for the administration of the submission process and will be made public.



Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
Spark New Zealand Trading Limited S118.002	General Approach	Retain the 'General Approach' section as proposed.	Support	Transpower supports the General Approach statement, and reference to Network Utilities as they assist in plan interpretation and clarification.	The whole of the submission point be allowed.
Federated Farmers of New Zealand S121.241	National Grid Sub division Corridor Definition	Amend the definition of 'National Grid Subdivision Corridor' as follows: <i>'the area measured either side of the centreline of above ground National Grid line as follows:</i> <i>a. 14m for 110Kv national grid lines on single poles</i> <i>b. 32m for 110Kv transmission lines on towers...'</i> And correct the accompanying diagram.	Oppose	Transpower acknowledges the only towers on the Fernhill-Woodville A and B lines are those associated with crossing rivers. There are four such river crossings, resulting in eight towers. Given such towers exist, it is appropriate the subdivision setback remain at 32m for those towers, noting the setback acts as a restricted discretionary activity trigger for resource consent. In relation to the diagram, the definition itself is independent of the diagram and the text stands. The diagram provides a visual aid to interpret and apply the National Grid Yard and Corridor definitions.	The whole of the submission point be disallowed.
Horticulture New Zealand S81.021	National Grid Yard Definition	Replace the definition of 'National Grid Yard' as follows: <i>'the area located within 12m in any direction from the outer visible edge of a National Grid support structure foundation or the area located within 10m either side of the centreline of an overhead 110kV National Grid line on single poles or the area located within 12m either side of the centreline of any overhead National Grid line on pi-poles or towers (including tubular steel towers where these replace steel lattice towers). The National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated by Transpower New Zealand. The measurement of setback distances from National Grid lines shall be taken from the centerline of the transmission line and from the outer edge of any support structure. The centerline at any point is a straight line between the centre points of the two support structures at each end of the span.</i>	Oppose	The only difference between the definition as notified and that sought by Horticulture NZ is that the submitter seeks a 10m setback in any direction from a National Grid single pole or pi-pole, whereas the notified version requires 12m. Transpower opposes the relief sought. The "National Grid Yard" setback is based on the position of the conductors in normal everyday wind conditions, as well as space to allow the support structures and conductors to be accessed and provide sufficient space for most (but not all) maintenance activities. A 12m setback around each support structure is also sought for access, maintenance and safety purposes. The approach proposed within the Proposed District Plan reflects the nationwide transmission corridor approach.	The whole of the submission point be disallowed.

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
		<p><i>The area located within:</i> <i>- 12m in any direction from the visible outer edge of a National Grid tower; or</i> <i>- 10m in any direction from a National Grid single pole or pi-pole; or</i> <i>- the area located within 10m either side of the centreline of any overhead 110kV National Gridline on single or pi-pole; or</i> <i>the area located within 12m either side of the centre line of any overhead National Grid line on towers.'</i></p>			
<p>Federated Farmers of New Zealand</p> <p>S121.242</p>	<p>National Grid Yard Definition</p>	<p>Amend the definition of 'National Grid Yard' asfollows: <i>'For the 110kv Fernhill-Woodville A, and the 110kv Fernhill-Woodville B:</i> <i>- the area located within 12m in any direction from the outer visible edge of a National Grid support structure foundation tower, and 8m from a National Grid pole,</i> <i>- or the area located within 10m either side of the centreline of an overhead 110Kv National Grid line on single poles or the area located within 12m either side of the centreline of any overhead National Grid line on pi-poles or towers (including tubular steel towers where these replace steel lattice towers).</i> <i>The National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated by Transpower New Zealand. The measurement of setback distances from National Grid lines shall betaken from the centerline of the transmission line and from the outer edge of any support structure. structures at each end of the span.'</i> <i>The centerline at any point is a straight line between the centre points of the two support structures at each end of the span.'</i></p>	<p>Oppose</p>	<p>The submitter seeks amendment to the setback from a pole support structure from 12m to 8m. Transpower opposes the relief sought. The“National Grid Yard” setback is based on the position of the conductors in normal everyday wind conditions, as well as space to allow the support structures and conductors to be accessed and provide sufficient space for most (but not all) maintenance activities. A 12m setback around each support structure is also sought for access, maintenance and safety purposes. The approach proposed within the Proposed District Plan reflects the nationwide transmission corridor approach. The submitter has referred to NZECP34 as the basis for establishing setbacks from pole support structures. Transpower does not support reliance on NZECP alone to give effect to the NPSET. NZECP34 also applies to all electricity lines and is not specific to the National Grid. As such it does not recognise the significance of the National Grid. Furthermore, the scope and purpose of NZECP34 is confined to safety. It is the Code of Practice that sets minimum safe distances to primarily protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards, and is focused only on minimum</p>	<p>The whole of the submission point be disallowed.</p>

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				<p>safety standards. As such, the 8m referred to in NZECP34 provides guidance on safety distances only and does not provide for access, operation, maintenance and development relating to the Transmission Network, or distances to manage the adverse effects of third party activities. To go closer than 12m to the support structures does not allow sufficient space for access, operation, maintenance and development.</p> <p>Minimum safety requirements in the Code do not seek to protect the integrity of the National Grid from the effects of third parties. Nor does it provide for all access, workspace, step and touch hazards where activities or infrastructure cause restrictions or create unsafe situations, especially during work activities on either Transpower's assets or works by a member of the public under or near a line.</p> <p>On this basis, reliance on NZECP34 and the request to provide an 8m setback from support structures does not give effect to or achieve the requirements of the NPSET "to operate, maintain, develop and upgrade the National Grid".</p>	
<p>Kāinga Ora - Homes and Communities S129.016</p>	<p>NU-I3</p>	<p>Amend NU-I3 as follows: <i>'Effects of Other Activities on Network Utilities</i> Where not appropriately managed, Anew subdivision, land use and development may impact on the safe and efficient functioning of network utilities.</p> <p><i>Explanation</i> Where not appropriately managed, Anew subdivision, land use and development in close proximity to existing network utilities can have the potential to constrain or compromise the efficient or effective operation, maintenance and development of those network utilities. In some instances, this can compromise health and safety through the location of sensitive activities close to network</p>	<p>Oppose</p>	<p>While Transpower understands the intent of the submission point and relief sought, it does not consider the amendment necessary or required. The associated policies and rules provide the framework for considering appropriateness.</p>	<p>The whole of the submission point be disallowed.</p>

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		<i>utilities, and through activities not adhering to safe clearances or safe distances from network utilities e.g. from electricity transmission networks (including the National Grid), high pressure gas network, overhead lines and cables, navigational aids, road and railway corridors etc.'</i>			
Horticulture New Zealand S81.052	NU-O3	Amend NU-O3 as follows: <i>'The safety, maintenance, upgrade or development of network utilities is, to the extent reasonably possible, not compromised by incompatible subdivision, land use or development, including the potential for reverse sensitivity effects.'</i>	Oppose	Transpower concurs with the submitter that the objective "is rather absolute". Such an approach is supported as it gives effect to the NPSET. Policy 10 directs activities to be managed, not qualifying the extent to which operation, maintenance, upgrading and development of the National Grid can be compromised. The relief sought is opposed on the basis it changes the policy directive from a clear directive to ensure network utilities are not compromised, to a subjective assessment in that it introduces consideration of "to the extent reasonably possible". It does not give effect to Policy 10 of the NPSET.	The whole of the submission point be disallowed.
Kāinga Ora - Homes and Communities S129.023	NU-P3	Delete NU-P3. <i>Avoid significant adverse effects and remedy or mitigate other adverse effects of upgrades to, and the development of new, network utilities on the values and attributes of areas identified in the District Plan as:</i> <i>1. High Natural Character Areas (in CE SCHED7); and</i> <i>2. Significant Amenity Features (in NFL SCHED6);</i>	Support in part	In its submission Transpower sought a specific policy framework to give effect to the NPSET. Should this relief not be granted, Transpower supports the relief sought by Kāinga Ora for deletion of the policy. As noted by the submitter, "the terms 'high natural character areas' and 'significant amenity features' are not defined within the plan, and it is presumed that these areas do not meet the threshold for consideration as 'outstanding natural landscapes and features'. Given the lack of clarity around what constitutes a 'high natural character area' or a 'significant amenity feature', it is unclear to what degree the plan should have regard to these matters within an RMA context".	The submission point be allowed if the relief sought in Transpower's submission on NU-P3 is not granted.

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Department of Conservation S64.024	NU-P4	Retain NU-P4.	Neutral	In its submission Transpower supported NU-P4. As such, the submission point by the Department of Conservation is supported. However, it is not clear how the policy “appropriately reflect Policy 8 of NPS-ET” (as stated in the reasoning for the submission point).	No specific relief sought.
Horticulture New Zealand S81.053	NU-P5	Amend NU-P5 as follows: <i>'To ensure that the adverse effects of subdivision, use and development, do not, to the extent reasonably possible, protect network utilities from the adverse effects of subdivision, use and development that may constrain or compromise the safe, effective, secure and efficient operation, maintenance, upgrading and development of network utilities, and the safety and amenity values of people and the community, including by:</i> ...'	Oppose	Specific to the National Grid, Transpower opposes the relief sought on the basis it changes the policy directive from a clear directive to 'protect' network utilities, to a subjective assessment in that it introduces consideration of “to the extent reasonably possible”. Such a policy directive is not supported as it does not give effect to the NPSET.	The whole of the submission point be disallowed.
Horticulture New Zealand S81.055	NU-P5	Amend NU-P5(6) as follows: '... <i>6. managing land use development (including sensitive activities) buildings, structures and subdivision near within the National Grid subdivision corridor, within the National Grid Yard, or around a designated National Grid substation.</i> ...'	Support	Transpower supports the relief sought. The amendment sought reflects that sought in Transpower's submission.	The whole of the submission point be allowed.
Department of Conservation S64.025	NU-R3	Amend NU-R3 to include 'Permitted' standard to specify the construction of new network utilities where outside of any ONFL, SNA, SASM, HNCA or SAF. Where within one of the above overlay's activity should be 'Restricted Discretionary' with appropriate matters of discretion.	Neutral	Rule NU-R3 is specific to network utilities within the National Grid Yard. Transpower acknowledges the concerns of the submitter but is neutral on the relief sought.	No specific relief sought.
Horticulture New Zealand	NU-R3	Clarify that 'reticulation and storage of water for irrigation purposes carried out by a network utility operator' is provided as a permitted activity within the National Grid Yard by either	Support	Subject to the retention of other National Grid specific rules within the plan, Transpower has no objection to the deletion of the wording as shown in the submission.	The whole of the submission point be

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S81.057		<p>NU-R3 or NU-R4. For example, delete from NU-R3 as follows: <i>'NU-R3 Construction of new network utilities, and upgrading of existing network utilities (that are not regulated by an NES) - within the National Grid Yard (other than for the reticulation and storage of water for irrigation purposes carried out by a network utility operator)</i> All Zones 1. Activity Status: PER Where the following activity conditions are met: a. d. The activity is located a minimum distance of 12 metres from the outer visible foundation of any National Grid support structure and associated stay wire, unless it: i. ... ii. is a network utility (other than for the reticulation and storage of water for irrigation purposes) or any part of electricity infrastructure undertaken by a network utility operator that connects to the National Grid; and</p>			allowed.
Kāinga Ora - Homes and Communities S129.062	ECO-Ecosystems and Indigenous Biodiversity	<p>Kāinga Ora seeks amendments to address the below matters:</p> <ol style="list-style-type: none"> 1. Appropriate differentiation is needed between trimming versus clearance activities in relation to indigenous vegetation and habitat, the function each of these activities plan, and the likely discrepancies in adverse effects. 2. Simplification and consolidation of assessment matters so as to provide greater certainty about the likely adverse effects requiring mitigation. 3. Kāinga Ora opposes reference to terms 'high natural character areas' and 'significant amenity features' in that these terms are not defined within the plan, and it is presumed that these areas do not meet the threshold for consideration as 'outstanding natural landscapes and features.' Given the lack of clarity around what constitutes a 'high natural character 	Support in part	<p>Transpower concurs with the submission regarding lack of clarity as to what constitutes a 'high natural character area' or a 'significant amenity feature'. The submission point is therefore supported.</p>	The submission point be allowed in part in so far as it relates to clarity sought as to what constitutes a 'high natural character area' or a 'significant amenity feature'.

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		area' or a 'significant amenity feature,' it is unclear to what degree the plan should have regard to these matters within an RMA context.			
Royal Forest and Bird Protection Society NZ S75.030	ECO-O2	Amend ECO-O2 as below: <i>'Maintain and enhance indigenous biodiversity within Central Hawke's Bay District.'</i>	Oppose	Transpower opposes the directive to 'enhance' indigenous biodiversity given there is no higher order policy directive to require enhancement of any non-significant indigenous vegetation.	The whole of the submission point be disallowed.
Kāinga Ora - Homes and Communities S129.090 S129.092 S129.093 S129.094 S129.095	SUB-R1 SUB-R3 SUB-R4 SUB-R5 SUB-R6	Amend SUB-R1 as follows: <i>'Subdivision not otherwise provided for All Zones</i> <i>1. Activity Status: CON</i> <i>Where the following conditions are met:</i> <i>a. Compliance with SUB-S1 or SUB-SX.</i> <i>...</i> <i>e. The land being subdivided is not located within an identified natural hazard area in the planning maps.</i> <i>Matters over which control is reserved:</i> <i>...</i> <i>2. Activity status where compliance with condition SUB-R1(1)(c) is not achieved: RDIS Matters over which discretion is restricted:</i> <i>...</i> <i>And in relation to non-compliances to SUB-R1(1)(b), SUB-R1(1)(c), SUB-R1(1)(d), and/or SUB-R1(1)(e), those matters below relevant to the non-compliance(s):</i> <i>k. SUB-AM16</i> <i>l. SUB-AMX</i> <i>m. SUB-AMY</i> <i>n. Whether alternative means of physical access to any national grid support structures and/or gas transmission</i>	Oppose	Transpower opposes the amendment seeking deletion of the non-complying activity status where compliance with the SUB-S4(2) and SUB-S4(3) National Grid Subdivision Corridor standards is not achieved. The specific activity status sought by the submitter is not clear from the amendments provided. The rationale for the deletion of the non-complying activity status is "risks and adverse effects of subdividing in such areas are generally well understood and can be clearly defined." It is not clear how the submitter proposes such matters be addressed given it also seeks deletion of the assessment matters in AM17 (submission point S129.121). Transpower opposes deletion of the non-complying activity status. The purpose of the subdivision provisions within the proposed plan are to manage subdivision in the National Grid Corridor to ensure that the long-term maintenance, operation, upgrading and development of the National Grid is not compromised. Subdivision is the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through	The submission point be disallowed in part in so far as it relates to SUB-R1(1)(d)

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		<p>network is available.</p> <p>3. Activity status where compliance with condition SUB-R1(1)(a) and/or SUB-R1(1)(b) is not achieved: DIS</p> <p>Activity status where compliance with condition SUB-R1(1)(d) is not achieved: NC'</p>		<p>the creation of reserves and/or open space where buffer corridors are located).</p> <p>The proposed plan provides for subdivision within the National Grid Subdivision Corridor as a restricted discretionary activity where a building platform is able to be accommodated outside the National Grid Yard, and access to support structures is provided. The restricted discretionary activity status for subdivision provides an appropriate incentive to design subdivision layouts that meet the standards. Importantly, it also provides for Transpower input into the subdivision proposal process and provides the ability for council to decline an application. Additionally, the activity classification provides clear guidance for applicants and the Council to ensure the design of subdivision manages the effects of the network on the future use of the subdivided land and the effects of that land use on the network. Specific examples where development has occurred that poses a risk to the secure and efficient operation of the National Grid include:</p> <ul style="list-style-type: none"> (a) Support structures being ring fenced by dwellings creating risks, compromising access and the ability to maintain and develop the line; (b) Development being surrounded by transmission lines restricting vehicle access to the line and support structures to undertake maintenance works; and (c) Earthworks around support structures. <p>A non-complying activity status sends a clear directive and gives effect to Policy 10 and Policy 11 of the NPSET.</p>	
<p>Federated Farmers of New Zealand</p> <p>S121.070</p>	<p>SUB-S4</p>	<p>Amend SUB-S4(2) and (3) as follows:</p> <p><i>'Subdivision of land within the National Grid Subdivision Corridor</i></p> <p>2. ...</p>	<p>Oppose</p>	<p>The relief sought in the submission point is opposed. While it is acknowledged a rural subdivision is different than that within an urban area, rural subdivisions can still compromise the National Grid.</p> <p>The purpose of the subdivision provisions within the</p>	<p>The whole of the submission point be disallowed</p>

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		<p>3. The layout of allotments and any enabling earthworks must ensure that physical access is maintained to any National Grid support structures located on the allotments, including any balance area.¹</p> <p>And rural subdivision that can meet the standard of a building site away from the National Grid Yard should have the same activity status as a normal rural subdivision.</p>		<p>proposed plan are to manage subdivision in the National Grid Corridor to ensure that the long-term maintenance, operation and development of the National Grid is not compromised. Subdivision is the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located).</p> <p>The proposed plan provisions provide for subdivision within the National Grid Subdivision Corridor as a restricted discretionary activity where a building platform is able to be accommodated outside the National Grid Yard, and access to support structures is provided. The restricted discretionary activity status for subdivision provides an appropriate incentive to design subdivision layouts that meet the standards. Importantly, it also provides for Transpower input into the subdivision proposal process and provides the ability for council to decline an application. Additionally, the activity classification provides clear guidance for applicants and the Council to ensure the design of subdivision manages the effects of the network on the future use of the subdivided land and the effects of that land use on the network. Specific examples where development has occurred that poses a risk to the secure and efficient operation of the National Grid include:</p> <ul style="list-style-type: none"> (a) Support structures being ring fenced by dwellings creating risks, compromising access and the ability to maintain and develop the line; (b) Development being surrounded by transmission lines restricting vehicle access to the line and support 	

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				structures to undertake maintenance works; and (c) Earthworks around a support structure. A non-complying activity status sends a clear directive and gives effect to Policy 10 and Policy 11 of the NPSET.	
Kāinga Ora - Homes and Communities S129.102	SUB-S4	<p>Delete SUB-S4(2), (3), (4) and (5).</p> <p><i>2. The subdivision of land in any zone within the National Grid Subdivision Corridor must be able to demonstrate that all resulting allotments are capable of accommodating a building platform for the likely principal building(s) and any building(s) for a sensitive activity outside of the National Grid Yard, other than where the allotments are for roads, access ways or network utilities.</i></p> <p><i>3. The layout of allotments and any enabling earthworks must ensure that physical access is maintained to any National Grid support structures located on the allotments, including any balance area.</i></p> <p><i>4. The subdivision of land in any zone containing the Gas Transmission Network must be able to demonstrate that all resulting allotments are capable of accommodating a building platform for the likely principal building(s) and any building(s) for a sensitive activity that is at least 20m from the Gas Transmission Pipeline and 30m from above-ground equipment forming part of the Gas Transmission Network.</i></p> <p><i>5. The layout of allotments and any enabling earthworks must ensure that physical access is maintained to the Gas Transmission Network where it is located on the allotments, including any balance area.</i></p>	Oppose	<p>The submission point is opposed.</p> <p>The purpose of the subdivision provisions within the proposed plan are to manage subdivision in the National Grid Corridor to ensure that the long-term maintenance, operation and development of the National Grid is not compromised, thereby giving effect to the NPSET.</p> <p>Transpower does not accept the proposition by the submitter that the “provisions are likely to unnecessarily hinder development where potential adverse effects could otherwise be managed”. It is not clear how the submitter proposes such matters be addressed given it also seeks deletion of the assessment matters in AM17 (submission point S129.121).</p> <p>Subdivision is the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located).</p> <p>The proposed plan provisions provide for subdivision within the National Grid Subdivision Corridor as a restricted discretionary activity where a building platform is able to be accommodated outside the National Grid Yard, and access to support structures is provided. The restricted discretionary activity status for subdivision provides an appropriate incentive to design subdivision layouts that meet the standards. Importantly, it also provides for Transpower input into the subdivision</p>	The submission point be disallowed in part in so far as it relates to SUB-S4(2), (3)

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				<p>proposal process and provides the ability for council to decline an application. Additionally, the activity classification provides clear guidance for applicants and the Council to ensure the design of subdivision manages the effects of the network on the future use of the subdivided land and the effects of that land use on the network. Specific examples where development has occurred that poses a risk to the secure and efficient operation of the National Grid include:</p> <p>(a) Support structures being ring fenced by dwellings creating risks, compromising access and the ability to maintain and develop the line;</p> <p>(b) Development being surrounded by transmission lines restricting vehicle access to the line and support structures to undertake maintenance works; and</p> <p>(c) Earthworks around support structures</p> <p>A non-complying activity status sends a clear directive and gives effect to Policy 10 and Policy 11 of the NPSET.</p>	
<p>Kāinga Ora - Homes and Communities</p> <p>S129.121</p>	<p>SUB-AM17</p>	<p>Delete SUB-AM17.</p>	<p>Oppose</p>	<p>The submission point and relief sought is opposed. The matters within SUB-AM17 provide a clear set of assessment matters and are supported.</p>	<p>The whole of the submission point be disallowed</p>
<p>Federated Farmers of New Zealand</p> <p>S121.087</p>	<p>EW-R5</p>	<p>Amend EW-R5 as follows:</p> <p><i>'Earthworks and vertical holes within the National Grid Yard</i></p> <p><i>All Zones</i></p> <p><i>1. Activity Status: PER</i></p> <p><i>Where the following conditions are met:</i></p> <p><i>a. From National Grid poles, the earthworks must be no</i></p>	<p>Oppose</p>	<p>Rule EW-R5 provides standards in which manage earthworks within proximity of the National Grid. In its submission Transpower supported the content of EW-R5 as notified.</p> <p>The submitter seeks amendment to the rule on the basis of consistency with NZECP34 (specifically Section 2.2 of the Code). While Transpower understands the concerns of the submitter as to consistency between the code and the</p>	<p>The whole of the submission point be disallowed</p>

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
		<p><i>deeper (measured vertically) than 300mm within 2.2m of the pole; and 750 mm between 2.2m and 5m of the pole, or</i></p> <p><i>b. From National Grid towers, the earthworks must be no deeper (measured vertically) than 300mm within 6m of a tower; and 3m between 6m and 12m of a tower 300mm within 12m of the outer visible edge of any National Grid support structure foundation, except under the following circumstances:</i></p> <p><i>i. ...</i></p> <p><i>ii. ...</i></p> <p><i>iii. vertical holes not exceeding 500mm in diameter, provided they:</i></p> <p><i>a. are not exceeding 500 mm diameter and are more than 1.5m from the outer edge of the pole support structure or stay wire, or</i></p> <p><i>b. are a post hole for a farm fence or artificial crop protection or crop support structures and are more than 6m5m from the visible outer edge of a tower support structure foundation.</i></p> <p><i>...'</i></p>		<p>district plan, Transpower does not support amendment to Rule EW-R5 based solely on NZECP34.</p> <p>At a general level, Transpower supports the provision of standards specific to earthworks on the basis such activities can compromise the National Grid and are a form of development contemplated by the NPSET. Specifically, uncontrolled earthworks can undermine the support structures or generate dust. This can result in the build-up of material on the National Grid lines and increase the wear on the equipment reducing its useable lifespan. Excavations or mounding mid-span can increase risks by reducing the clearance between the ground and conductors. Excavated areas or piles of earthworks soil can also restrict Transpower's ability to access and locate the heavy machinery required to maintain support structures around the lines, and may lead to potential tower failure and significant constraints on the operation of the lines, such as power outages. For these reasons, Transpower seeks control on earthworks near the National Grid. The provision of a rule framework achieves Policies 2 and 10 of the NPSET in that it protects the integrity of the National Grid and the ability to operate it. With respect to the NZECP34, it applies to all electricity lines and is not specific to the National Grid. As such it does not recognise the significance of the National Grid. Furthermore, the scope and purpose of NZECP34 is confined to safety. It is the Code of Practice that sets minimum safe distances to primarily protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards and is focused only on minimum safety standards. It is Transpower's position that the minimum safety requirements in the Code alone do not protect the integrity of the National Grid from the effects of earthworks.</p>	

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				<p>In determining appropriate setback distances for earthworks from National Grid support structures, a common assumption made is that compliance with NZECP is sufficient to ensure the Grid is not compromised. The example below illustrates this is not the case and that NZECP34:2001 on its own does not give effect to the NPSET and Policy 10. Figure 1 illustrates earthworks that have been undertaken on a property that are technically compliant with NZECP34:2001. As a result of the earthworks in vicinity of the pole structure, Transpower's ability to operate and maintain the network has been compromised. The batter slope may become unstable as a result of erosion and slipping. Access to the site is now severely restricted and there is no ability for Transpower to operate heavy plant on the elevated platform. Ongoing engineering checks will be required to monitor the effects of erosion and to check the stability of the foundations.</p>  <p><i>Figure 1. NZECP34 compliant earthworks around a pole on ARI-HAM-A 110kV</i></p>	

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<p>Kāinga Ora - Homes and Communities</p> <p>S129.126</p>	<p>EW-R5</p>	<p>Amend EW-R5 as follows:</p> <p><i>'Earthworks and vertical holes within the National Grid Yard All Zones</i></p> <p><i>1. Activity Status: PER</i></p> <p><i>Where the following conditions are met:</i></p> <p><i>a. The earthworks must be no deeper (measured vertically) than 300mm within 612m of the outer visible edge of any National Grid support structure foundation, except under the following circumstances:</i></p> <p><i>...'</i></p>	<p>Oppose</p>	<p>Rule EW-R5 provides standards which manage earthworks within proximity of the National Grid. In its submission Transpower supported the content of EW-R5. The submitter seeks amendment to the rule without any justification or explanation other than "6 metres is a more appropriate buffer from the national grid support structure foundation within which earthworks limitations apply".</p> <p>Based on the information provided, Transpower does not accept this reasoning, or the relief sought.</p> <p>At a general level, Transpower supports the provision of standards specific to earthworks on the basis such activities can compromise the National Grid and are a form of development contemplated by the NPSET. Specifically, uncontrolled earthworks can undermine the support structures or generate dust. This can result in the build-up of material on the National Grid lines and increase the wear on the equipment reducing its useable lifespan. Excavations or mounding mid-span can increase risks by reducing the clearance between the ground and conductors. Excavated areas or piles of earthworks soil can also restrict Transpower's ability to access and locate the heavy machinery required to maintain support structures around the lines, and may lead to potential tower failure and significant constraints on the operation of the lines, such as power outages. For these reasons, Transpower seeks control on earthworks near the National Grid. The provision of a rule framework achieves Policies 2 and 10 of the NPSET in that it protects the integrity of the National Grid and the ability to operate it.</p> <p>It is not clear why the submitter proposes 6m. If it is based on NZECP34 applies to all electricity lines and is not specific to the National Grid. As such it does not recognise the significance of the National Grid. Furthermore, the</p>	<p>The whole of the submission point be disallowed</p>

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
				scope and purpose of NZECP34 is confined to safety. It is the Code of Practice that sets minimum safe distances to primarily protect persons, property, vehicles and mobile plant from harm or damage from electrical hazards, and is focused only on minimum safety standards. It is Transpower's position that the minimum safety requirements in the Code alone do not seek to protect the integrity of the National Grid from the effects of earthworks. In determining appropriate setback distances for earthworks from National Grid support structures, a common assumption made is that compliance with NZECP is sufficient to ensure the Grid is not compromised. This is not the case.	
Horticulture New Zealand S81.091	EW-S6	Amend EW-S6 to clearly state that 'ancillary rural earthworks' are a permitted activity.	Oppose	<p>Transpower acknowledge the concerns of the submitter that ancillary rural earthworks such as cultivation and road and track maintenance should be provided for as permitted activity consistent with NZECP:2001. However, notwithstanding cultivation is excluded from the definition of earthworks under the PDP, such activities are permitted where they comply with the standards within Rule EW-R5. Specifically Rule EW-R5.1(a)(ii) provides for such activities where the standards within EW-S6 are met. The standards within EW-S6 are as follows:</p> <ol style="list-style-type: none"> 1. <i>The earthworks must not compromise the stability of a National Grid support structure, and</i> 2. <i>The earthworks must not result in a reduction in ground-to-conductor clearance distances of less than: 6.5m (measured vertically) from a 110kV National Grid transmission line, and</i> 3. <i>The earthworks must not result in the permanent loss of vehicular access to any National Grid support structure.</i> <p>On the basis ancillary rural earthworks such as cultivation and road and track maintenance meet the standards, the</p>	The whole of the submission point be disallowed

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
				activity is permitted. Based on the above and the current definition of 'earthworks' no amendment is considered necessary to Rule EW-R5.	
Rayonier Matarki Forests S85.016	EW-S6	Amend EW-S6 to exclude earthworks and land disturbance activities that relate to the NES-PF.	Support	Given there are no existing established forests within the Central Hawke's Bay, existing underneath transmission lines, Transpower has no objection to the relief sought.	The whole of the submission point be allowed
Federated Farmers of New Zealand S121.097	EW-S6	Amend EW-S6 as follows: <i>'Earthworks and Vertical Holes within the National Grid Yard All Zones</i> <i>1. The earthworks must not compromise the stability of a National Grid support structure, and</i> <i>2. The earthworks must not result in a reduction in ground-to-conductor clearance distances specified in Table 4 of NZECP34, of less than: 6.5m (measured vertically) from a 110kV National Grid transmission line, and</i> <i>3. The earthworks must not result in the permanent loss of vehicular access to any National Grid support structure.'</i>	Oppose	Rule EW-R5 provides standards in which manage earthworks within proximity of the National Grid. In its submission Transpower supported the content of R5. The submitter seeks amendment to the rule to: a) reference NZEPC34 in relation to conductor clearance distances and b) remove the access standard. At a general level, Transpower supports the provision of standards specific to earthworks on the basis such activities can compromise the National Grid and are a form of development contemplated by the NPSET. Specifically, uncontrolled earthworks can undermine the support structures or generate dust. This can result in the build-up of material on the National Grid lines and increase the wear on the equipment reducing its useable lifespan. Excavations or mounding mid-span can increase risks by reducing the clearance between the ground and conductors. Excavated areas or piles of earthworks soil can also restrict Transpower's ability to access and locate the heavy machinery required to maintain support structures around the lines, and may lead to potential tower failure and significant constraints on the operation of the lines, such as power outages. For these reasons, Transpower seeks control on earthworks	The whole of the submission point be disallowed

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
				<p>near the National Grid. The provision of a rule framework achieves Policies 2 and 10 of the NPSET in that it protects the integrity of the National Grid and the ability to operate it.</p> <p>With respect to sought deletion of reference to 6.5m and instead cross reference to NZECP, Transpower is not opposed to the outcome but supports a metric measurement as it is more readily understood than NZECP.</p> <p>With respect to the access requirement, Transpower has had instances in the past where access to a support structure is severed and there is no ability as is proposed by the submitter for "The Network Utility Operator will just have to travel to the structure using a different route". Figure 1 illustrates earthworks that have been undertaken on a property that are technically compliant with NZECP34:2001. As a result of the earthworks in vicinity of the pole structure, Transpower's ability to operate and maintain the network has been compromised. The batter slope may become unstable as a result of erosion and slipping. Access to the site is now severely restricted and there is no ability for Transpower to operate heavy plant on the elevated platform. Ongoing engineering checks will be required to monitor the effects of erosion and to check the stability of the foundations.</p>	

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				 <p data-bbox="1288 619 1892 678"><i>Figure 1. NZECP34 compliant earthworks around a pole on ARI-HAM-A 110kV</i></p>	
<p data-bbox="78 683 264 742">New Zealand Defence Force</p> <p data-bbox="78 783 264 810">S29.014</p>	<p data-bbox="271 683 394 710">TEMP-R3</p>	<p data-bbox="400 683 1111 742">Retain TEMP-R3 as notified, with the following modifications:</p> <p data-bbox="400 783 1111 810"><i>'Temporary military training activities</i></p> <p data-bbox="400 815 1111 842"><i>All Zones</i></p> <p data-bbox="400 847 1111 874"><i>1. Activity Status: PER</i></p> <p data-bbox="400 879 1111 906"><i>Where the following conditions are met:</i></p> <p data-bbox="400 911 1111 938"><i>a. Limited to:</i></p> <p data-bbox="400 943 1111 1070"><i>i. a period of 31 days, excluding set-up or pack-down activities, which can occur up to one week prior to commencement and up to one week following completion of the temporary military training activity.</i></p> <p data-bbox="400 1075 1111 1102"><i>b. Compliance with:</i></p> <p data-bbox="400 1107 1111 1134"><i>i. NOISE-S1 (measurement and assessment of noise); and</i></p> <p data-bbox="400 1139 1111 1235"><i>ii. NOISE-S5(31), NOISE-S5(32), NOISE-S5(33), and NOISE-S5(34) and NOISE-S5(35) (noise limits specific to temporary military training activities).</i></p> <p data-bbox="400 1240 1111 1267"><i>c. Compliance with:</i></p> <p data-bbox="400 1272 1111 1299"><i>i. EW-S1 (slope);</i></p> <p data-bbox="400 1303 1111 1331"><i>ii. EW-S2 (extent of earthworks);</i></p> <p data-bbox="400 1335 1111 1362"><i>iii. EW-S3 (vertical extent of earthworks);</i></p> <p data-bbox="400 1367 1111 1394"><i>iv. EW-S4 (site reinstatement);</i></p> <p data-bbox="400 1399 1111 1426"><i>v. EW-S5 (control of silt and sediment);</i></p>	<p data-bbox="1117 683 1261 742">Oppose in part</p>	<p data-bbox="1267 683 1928 742">Transpower's concerns with the submission point only relate to the reference to EW-S6.</p> <p data-bbox="1267 746 1928 874">Transpower understands the New Zealand Defence Force are not disputing the need to comply with the standard, rather than reference within TEMP-R3 is not required.</p> <p data-bbox="1267 879 1928 1166">Related to concerns raised in its original submission regarding linkages between the plan chapters and various plan provisions, Transpower is not clear if rule EW-S6 will be otherwise captured by 'Temporary military training activities'. The rule linkages are ambiguous and open to interpretation. If EW-S6 is otherwise captured and would apply, Transpower has no concerns with deletion from TEMP-R3. However if not, it opposes the submission point and seeks retention of the reference.</p>	<p data-bbox="1935 683 2121 1038">The submission point be disallowed in part in so far as it relates to <i>vi. EW-S6 (earthworks within the National Grid Yard)</i></p>

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
		<p>vi. EW-S6 (earthworks within the National Grid Yard); and vii. EW-S8 (electrical safety distances); d. No permanent structures must shall be constructed, unless otherwise permitted by the plan.'</p>			
Horticulture New Zealand S81.129	GRUZ-S13	Amend GRUZ-S13(3)(b) as follows: 'Setback from National Grid Yard and National Grid Substation ... 3. Around National Grid support structures: buildings and structures permitted under clause 2 above must be setback at least 12m from a tower, or 8m from a pole, forming part of a National Grid support structure, except where the building or structure is: a. ... b. an artificial crop protection structure or crop protection support structure between 8m and 12m from a pole support structure and any associated stay wire, that: i. ...	Support	Notwithstanding the relief sought in Transpower's original submission, the amendment to refer to 'crop support' as opposed to 'crop protection' structure is supported.	The whole of the submission point be allowed
Federated Farmers of New Zealand S121.199	GRUZ-S13	Delete GRUZ-S13(1).	Support	In its submission Transpower sought deletion of GRUZ-S13(1). This was on the basis of the 12ha minimum lot size for subdivision within the zone and that there are no sensitive activities within proximity of the site.	The whole of the submission point be allowed
Federated Farmers of New Zealand S121.200 S121.230	GRUZ-S13 RPROZ-15	Delete GRUZ-S13(2)(b). and Delete RPROZ-S15(2)(b). ... 2. Under the National Grid conductors (wires): a. on all sites within any part of the National Grid Yard, all buildings and structures must: i. if for an existing sensitive activity, not involve an increase in the building height or footprint where alterations and additions to existing buildings occur; or	Oppose	Transpower opposes the submission point. While the submitters raises concerns with the access component of the standard, and that compliance is required with NZECP34, Transpower remains of the opinion clause b. is appropriate and warranted. With respect NZECP34, Transpower's position is that reliance on NZECP alone to give effect to the NPSET is not appropriate. NZECP34 also applies to all electricity lines and is not specific to the National Grid. As such it does not recognise the significance of the National Grid. The	The whole of the submission point be disallowed

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
		<p><i>ii. be a fence less than 2.5m high; or</i></p> <p><i>iii. be an uninhabitable farm building or structure for primary production activities (but not a milking/dairy shed (excluding ancillary structures), enclosed protective canopies made from impermeable material, commercial greenhouses, or intensive primary production buildings); or</i></p> <p><i>iv. be an uninhabited horticultural building or structure (but not a commercial greenhouse).</i></p> <p><i>b. all buildings or structures permitted by a. must comply with the following conditions:</i></p> <p><i>i. demonstrate that safe electrical clearance distances required by NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are maintained under all National Grid line operating conditions.</i></p> <p><i>ii. not permanently physically impede existing vehicular access to a National Grid support structure.</i></p>		<p>requirement for a clearance distance is a crucial component of the corridor approach as infringements to the required clearance can endanger safety and affect the operation of the Grid.</p> <p>With regards to access, it is important Transpower is readily access support structures for operational and maintenance requirements, including responding to emergency faults.</p>	
<p>Horticulture New Zealand</p> <p>S81.174</p>	<p>RPROZ-S15</p>	<p>Amend RPROZ-S15(3)(b) as follows: <i>'Setback from National Grid Yard and National Grid Substation</i> ... <i>3. Around National Grid support structures: buildings and structures permitted under clause 2 above must be setback at least 12m from a tower, or 8m from a pole, forming part of a National Grid support structure, except where the building or structure is:</i></p> <p><i>a. ...</i></p> <p><i>b. an artificial crop protection structure or crop protection support structure between 8m and 12m from a pole support structure and any associated stay wire, that:</i></p> <p><i>i. ...</i></p>	<p>Support</p>	<p>Notwithstanding the relief sought in Transpower's original submission, the amendment to refer to 'crop support' as opposed to 'crop protection' structure is supported.</p>	<p>The whole of the submission point be allowed</p>

Central Hawke's Bay District Plan – Further Submission by Transpower NZ Ltd

Submitter Name/ Number and Point	Plan Provision	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	Transpower Position	Summary of Reasons The reasons for Transpower's support or opposition are	Transpower seeks that the whole or part of the submission be allowed /disallowed
Federated Farmers of New Zealand S121.229	RPROZ-S15	Delete RPROZ-S15(1).	Support	In its submission Transpower sought deletion of RPROZ-S15(1). This was on the basis of the 12ha minimum lot size for subdivision within the zone and that there are no sensitive activities within proximity of the site.	The whole of the submission point be allowed