

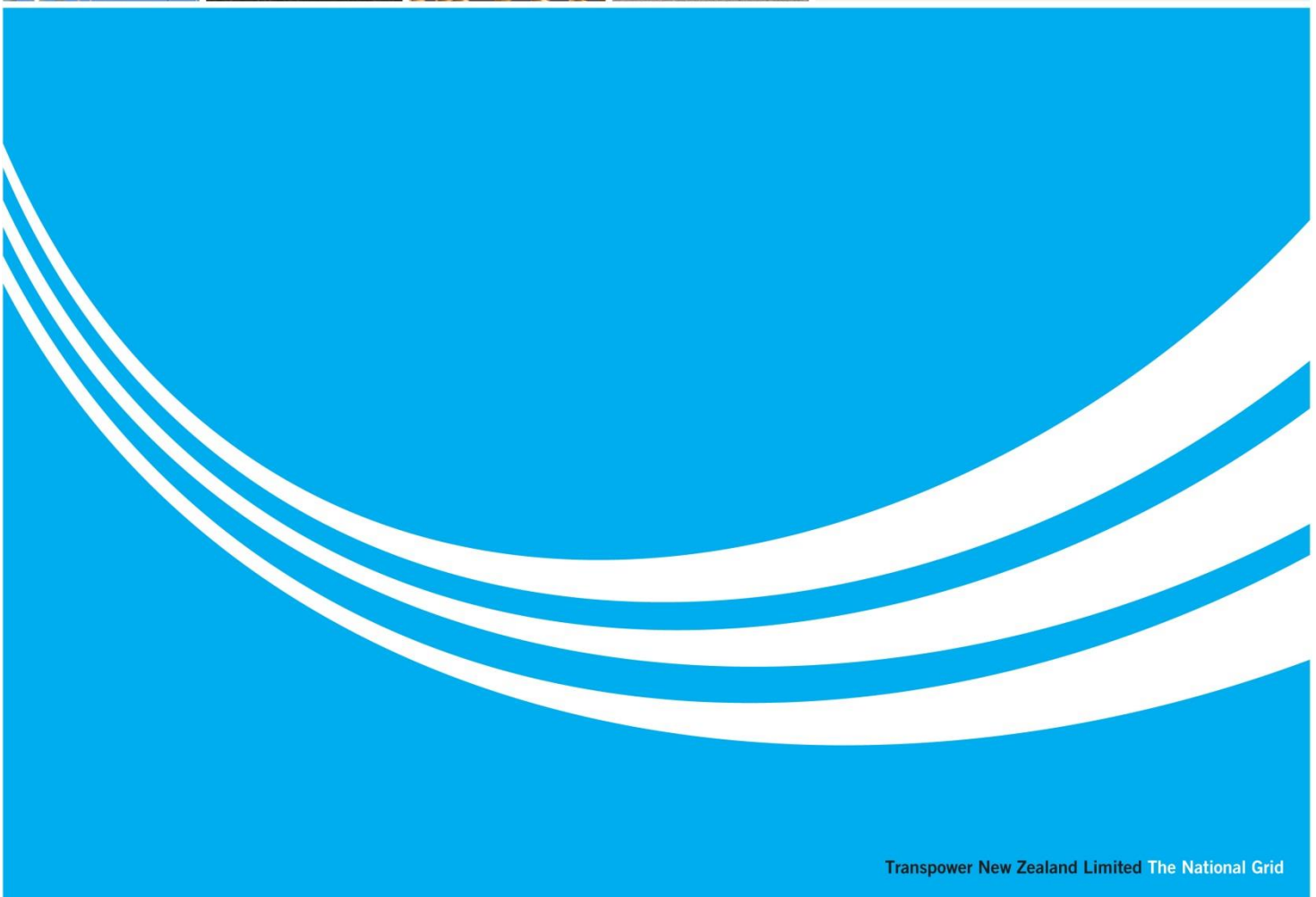
Appendix 2 – Further submission by Transpower New Zealand Limited on the Proposed Queenstown Lakes District Plan – Stage 2

Further Submission by Transpower New Zealand Limited

Proposed Queenstown Lakes District Plan: Stage 2

27 April 2018

Keeping the energy flowing



Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

Clause 8 of Schedule 1, Resource Management Act 1991

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 Stage 2 (Proposed Plan).

Transpower is making this further submission 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 Appendix 1 (attached). The general reasons for Transpower's further submission are set out below. These reasons apply in respect of each submission identified in Appendix 1 and are also supplemented by the more specific reasons and relief in Appendix 1.

General reasons in respect of submissions supported by Transpower

Transpower is supportive of the submissions identified in Appendix 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 communities 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 Council's 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

Transpower opposes the submissions identified in Appendix 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.



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

Date: 27 April 2018

Address for service of further submitter: c/- Beca Limited
PO Box 5005
Dunedin 9058

Telephone: +64 3 477 3105

Mobile: +64 27 702 5408

Email: aileen.craw@beca.com

Contact person: Aileen Crow, Senior Planner

Appendix 1: Transpower New Zealand Limited: Further Submission on Submissions made on the Proposed Queenstown Lakes District Plan Stage 2

Submitter	Provision and Submission Summary	Support / Oppose	Reason	Accept / Reject
Chapter 24: Wakatipu Basin				
Chorus New Zealand Limited (2194.7); Vodafone New Zealand Limited (2478.7) and Spark New Zealand Limited (2195.7)	Amend Policy 24.2.4.6 as follows, and move (and renumber as required) to sit under either Objective 24.2.1 or Objective 24.2.2: <i>"Ensure that other For utilities, including regionally significant infrastructure, ensure that these are located and operated to maintain landscape character and visual amenity values to the extent practicable, having regard to the important functional and locational constraints of these activities."</i>	Support in part	Transpower generally supports the submissions made by the three submitters on the basis that the relief sought appropriately recognises that it may not always be possible for regionally significant infrastructure to maintain landscape character and visual amenity values. However, Transpower seeks that Council accept Transpower's original relief sought as the proposed wording is more consistent with the NPSET, particularly Policies 3 and 8. In terms of the submission point requesting that the policy be moved to sit under either Objective 24.2.1 or Objective 24.2.2, Transpower supports this submission and seeks that the Policy be moved to sit under Objective 24.2.1 which aims to ensure that "Landscape and visual amenity values are protected, maintained and enhanced".	Accept the submission , subject to the relief sought in Transpower's original submission
Chapter 25: Earthworks				
Queenstown Airport Corporation (2618.2)	Retain Policy 25.2.2.1 QAC recognises that earthworks are a necessary part of subdivision and development and as such, support the social and economic wellbeing of the community. QAC therefore considers that it is appropriate for such benefits to be recognised in the Proposed Plan. QAC is concerned however, that poorly managed earthworks can give rise to a range of adverse effects, including potentially significant and adverse effects for aircraft on approach or departure from Queenstown and Wanaka Airports. QAC therefore supports the inclusion of provisions in the Proposed Plan which give consideration to the effects of earthworks on the	Support in part	Transpower generally supports the submission but considers that any additional provisions would need to appropriately recognise the importance of Nationally and Regionally Significant Infrastructure, such as the National Grid, and the necessity of earthworks for the development, upgrade and maintenance of this infrastructure. This is appropriately recognised under notified Policy 25.2.2.1 and thus gives effect to the Objective and Policy 2 of the NPSET.	Reject in part

	operation and safety of Queenstown and / or Wanaka Airports.			
Queenstown Airport Corporation (2618.2)	<p>Retain Policy 25.2.2.2</p> <p>QAC recognises that earthworks are a necessary part of subdivision and development and as such, support the social and economic wellbeing of the community. QAC therefore considers that it is appropriate for such benefits to be recognised in the Proposed Plan.</p> <p>QAC is concerned however, that poorly managed earthworks can give rise to a range of adverse effects, including potentially significant and adverse effects for aircraft on approach or departure from Queenstown and Wanaka Airports. QAC therefore supports the inclusion of provisions in the Proposed Plan which give consideration to the effects of earthworks on the operation and safety of Queenstown and / or Wanaka Airports.</p>	Support in part	Transpower generally supports the submission but considers that any additional provisions would need to appropriately recognise the importance of Nationally and Regionally Significant Infrastructure, such as the National Grid, and the necessity of earthworks for the development, upgrade and maintenance of this infrastructure. This is appropriately recognised under notified Policy 25.2.2.2 and thus gives effect to the Objective and Policy 2 of the NPSET.	Reject in part
Federated Farmers New Zealand (2540.54)	<p>Amend the definition of 'Earthworks' as follows (shown in red):</p> <p><i>"Means the disturbance of land surfaces by the removal or <u>deposition on or change to the profile of land.</u></i></p> <p><i><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, but does not include the cultivation of farm land or the digging of holes for the erection of posts, planting of trees or other vegetation, 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 offal pits and the erection of posts or poles or the planting of trees.</u></i></p>	Oppose in part	<p>Transpower opposes the submission point in part as Transpower considers that some of the specific activities (namely the digging of holes for post and planting trees) requested for exclusion can have an effect on the National Grid and therefore these activities should be subject to the National Grid corridor rules. Furthermore, if these activities are excluded then a regulatory gap is created as these activities would not be captured by the earthworks rules in the 'Energy and Utilities' chapter of the Plan.</p> <p>Transpower therefore seek that this submission be rejected and that Transpower's relief sought in its submission on the definition of "Earthworks" in Stage 2 be retained.</p>	Reject in part