

**Submission by Transpower New Zealand Limited**

**Proposed Plan Change 1 – Minor Improvements to the  
Partially Operative Second Generation Dunedin City District  
Plan 2024**

**18 December 2024**

*Keeping the energy flowing*



## Form 5

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

*Clause 6 of Schedule 1, Resource Management Act 1991*

To Dunedin City Council ("the Council")

**Name of submitter:** Transpower New Zealand Limited ("Transpower")

**This is a submission on a change proposed to the following proposed variation to a proposed plan ("the proposal"):**

Proposed Plan Change 1 – Minor Improvements to the Partially Operative Second Generation Dunedin City District Plan 2024 ("2GP" and "Proposed Plan Change")

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

**The specific provisions of the proposal that my submission relates to are:**

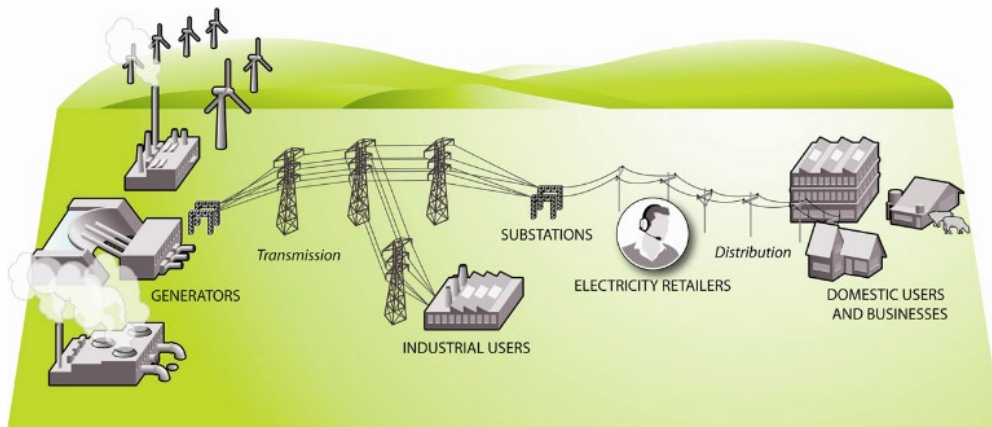
The provisions listed in **Attachment A** to this submission.

**Transpower's submission is:**

*Background: The National Grid*

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand's high voltage electricity transmission network, known as the National Grid. The National Grid connects power stations, owned by electricity generating companies, directly to major industrial users and distribution companies feeding electricity to the local networks that, in turn, distribute electricity to homes and businesses. The role of Transpower is illustrated in **Figure 1** by the 'Transmission' and 'Substations' components."

*Figure 1: Role of Transpower in New Zealand's Electricity Industry (source: MBIE)*



The National Grid stretches over the length and breadth of New Zealand from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 kilometres of transmission lines and cables and more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local

lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's Statement of Corporate Intent for 1 July 2024, states that:

*"Transpower is central to the New Zealand electricity industry. We connect generators to distribution companies and large users over long distances, providing open access and helping to balance supply and demand. The nature and scope of the activities we undertake are:*

- as grid owner, we own, build, maintain, replace, and enhance the physical infrastructure that connects those who generate and those who need electricity to live, work and play across the country; and*
- as system operator, through a service provided under contract to the Electricity Authority under the Electricity Industry Participation Code, we operate the electricity market, managing supply and demand for electricity in real time to ensure that the power system remains stable and secure."*

In line with these objectives, Transpower needs to efficiently operate, maintain and develop the network to meet increasing demand and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

Transpower has an interest in the Proposed Plan Change in respect of the extent to which the proposed new and amended provisions impact Transpower's ability to operate, maintain, upgrade and develop the National Grid. Transpower's submission therefore supports those provisions that continue to protect the National Grid from sensitive activities and those that enable activities associated with the operation, maintenance, upgrade and development of the National Grid.

#### The National Grid in Dunedin City

Transpower owns and operates assets within, and traversing Dunedin City. These assets supply electricity to Dunedin City and beyond and include the following:

- Halfway Bush-Roxburgh A 110kV double circuit steel tower transmission line (HWB-ROX A);
- Gore-Halfway Bush A 110kV single circuit pi pole transmission line (GOR-HWB A);
- North Makarewa-Three Mile Hill A 220kV double circuit steel tower transmission line (NMA-TMH A);
- Halfway Bush-South Dunedin A 220kV double circuit steel tower transmission line (HWB-SDN A);
- Roxburgh-Three Mile Hill A 220kV double circuit steel tower transmission line (ROX-TMH A);
- Berwick 110kV substation National Grid injection point connecting the Waipori Power Scheme to the National Grid;
- Three Mile Hill 220kV substation interconnecting the Halfway Bush and South Dunedin Substations with the rest of the 220kV network;
- Halfway Bush 220/110/33kV substation National Grid exit point for the supply of electricity to Dunedin customers; and
- South Dunedin 220/33kV substation National Grid exit point for the supply of electricity to Dunedin customers.

These assets are shown on the 2GP planning maps.

#### The Resource Management Act 1991 ("RMA") and the National Grid

The national significance of the National Grid is recognised, in an RMA context, by the NPSET. Transpower's submission on the Proposed Plan Change is concerned with ensuring the statutory requirement to give effect to the NPSET (section 75(3) of the RMA) is met insofar as is relevant in the context of the provisions of the Proposed Plan Change.

The NPSET confirms the national significance of the National Grid and provides policy direction in relation to:

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

The single Objective of the NPSET is:

*“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:*

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Section 75(3) of the RMA also requires the Proposed Plan Change to give effect to a regional policy statement. The Otago Regional Policy Statement (“ORPS”) is partially operative. Policies that are particularly relevant to the relief sought by Transpower are, Policy 4.3.1: Managing infrastructure activities; Policy 4.3.3: Functional needs of infrastructure that is nationally or regionally significant; Policy 4.4.4: Efficient transport of electricity and Policy 4.3.6 that is specific to providing for the National Grid. More recently decisions have been made on the Proposed Otago Regional Policy Statement. The provisions relevant to the National Grid are subject to appeal.

Transpower’s submission

Transpower’s submission generally supports proposed amendments to the 2GP in the Proposed Plan Change that are relevant to the operation, maintenance, upgrade and development of the National Grid.

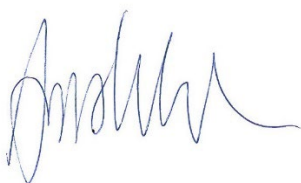
**Attachment A** includes Transpower’s detailed submission in respect of the Proposed Plan Change.

**Transpower seeks the following decision from the local authority:**

Retain or amend the provisions of the Proposed Plan Change as set out in **Attachment A** and such further alternative or consequential relief as may be necessary to fully give effect to this submission.

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

**Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.**



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

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**Electronic address for service:** ainsley@amconsulting.co.nz  
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## Attachment A: Transpower New Zealand Limited: Submission on Proposed Plan Change 1 to the Partially Operative Second Generation Dunedin City District Plan 2024

The following table sets out the decisions sought by Transpower and the reasons for Transpower’s support for, or opposition to, the notified provisions of the Proposed Plan Change.

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
<p><b>Change TA4</b></p> <p>Definition of ‘Construction’</p> <p>Definition of ‘Operation, repair, minor upgrading and maintenance of existing network utilities’</p> <p>Definition of ‘Underground or internal network utilities’</p> <p>Rule 4.3.2.2</p> <p>Rule 5.3.2.2</p> <p>Rule 5.3.2.3</p> <p>Rule 4.5.3.4</p> <p>Rule 5.5.12</p> <p>Rule 5.7.3.Y</p> <p>Policy 5.2.1.3</p>	<p><b>Support</b></p>	<p>Transpower understands that the purpose of Change TA4 is to address construction related activities that may require storage of related materials (e.g. gravel for road maintenance or pipes for stormwater upgrades), tools, machinery, and relocatable site offices on sites other than where the activity is occurring by:</p> <ul style="list-style-type: none"> <li>• adding the use or storage of materials, equipment, or relocatable site offices (either on-site or off-site) to the definitions of ‘operation, repair, minor upgrading and maintenance of existing network utilities’, ‘underground or internal network utilities’, and ‘operation, repair and maintenance of the roading network’, and ‘construction’;</li> <li>• managing associated adverse effects through new performance standards to restrict the duration and frequency of these activities when undertaken off-site; and</li> <li>• including new assessment rules and policies.</li> </ul> <p>Transpower generally supports Change TA4 and considers that, insofar as the provisions relate to the development of the National Grid, Change TA4 gives effect to the NPSET (and particularly Policies 1, 2 and 5) because the provisions recognise and provide for the development of the National Grid.</p>	<p><b>Retain</b> the following provisions as notified:</p> <ul style="list-style-type: none"> <li>• Definition of ‘Construction’</li> <li>• Definition of ‘Operation, repair, minor upgrading and maintenance of existing network utilities’</li> <li>• Definition of ‘Underground or internal network utilities’</li> <li>• Rule 4.3.2.2</li> <li>• Rule 5.3.2.2</li> <li>• Rule 5.3.2.3</li> <li>• Rule 4.5.3.4</li> <li>• Rule 5.5.12</li> <li>• Rule 5.7.3.Y</li> <li>• Policy 5.2.1.3</li> </ul>

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
<p><b>Change Earth1</b></p> <p>Definition of ‘construction’</p> <p>Definition of ‘earthworks’</p> <p>Definition of ‘temporary activities’</p>	<b>Support</b>	<p>Transpower understands that the purpose of Change Earth1 is to, amongst other matters, address the absence of rules for geotechnical investigations.</p> <p>Transpower supports the inclusion of provisions that enable geotechnical investigations on the basis that, insofar as the provisions relate to the development of the National Grid, Change Earth1 gives effect to the NPSET (and particularly Policies 1, 2 and 5) because the provisions recognise and provide for the development of the National Grid.</p> <p>That said, Transpower notes that the National Planning Standards direct that district plans include a mandatory definition of ‘earthworks’ and, as such, it is suggested that the outcome sought in Change Earth1 may require refinement so that compliance with the National Planning Standards mandatory direction is achieved.</p>	<b>Retain</b> the definitions of ‘construction’, ‘earthworks’ and ‘temporary activities’ as notified or alternatively, in the case of the ‘earthworks’ definition make amendments to the 2GP provisions that achieve an outcome that enables geotechnical investigations throughout the city.
<p><b>Change D16</b></p> <p>1.4.1 Definitions</p> <p>‘National Grid Sensitive Activities’</p> <p>‘Healthcare’</p>	<b>Support</b>	<p>Transpower understands that the proposed change to the definition of ‘National Grid Sensitive Activities’ is a consequence of proposed changes to provide a refined approach to healthcare activities in Dunedin. Transpower supports this consequential amendment to the definition on the basis that the definition remains consistent with the definition of ‘sensitive activities’ in the NPSET.</p>	<b>Retain</b> the amendment to the definition of ‘National Grid Sensitive Activities’ and the new definition of ‘Healthcare’ as notified.
<p><b>Change CP8</b></p> <p>A. Plan Overview and Strategic Directions</p> <p>2. Strategic Directions</p> <p>2.4 Dunedin is a Memorable City with a Distinctive Built and Natural Character</p> <p>Policy 2.4.1.8</p>	<b>Support</b>	<p>Transpower understands that the proposed change to the Policy is to achieve greater consistency within the 2GP. Transpower does not oppose the proposed change on the basis that the exemption for utilities (and now infrastructure) is retained.</p>	<p><b>Retain</b> the amendment to Policy 2.4.1.8 as notified:</p> <p><i>“Require subdivision to be designed to ensure any <u>existing or</u> future land use or development is able to meet the performance standards in the zone, <u>provide for a wastewater disposal area away from water bodies where in an unreticulated area, <del>or</del> and, where in a structure plan mapped area, reflects the requirements of the structure plan mapped area performance standards, unless:</u></i></p> <ol style="list-style-type: none"> <li><i>a resource consent is approved for a development that does not meet the performance standard and the subdivision is intended for and capable of providing for that approved development; or</i></li> <li><i>the resultant site is required for <u>infrastructure, reserves, access, protection of biodiversity or heritage, or another purpose specified in the shape performance standard for the zone.</u>”</i></li> </ol>

Provision	Support/ Oppose	Submission/Reasons	Decision Sought
			<i><del>i. a Scheduled ASBV; or</del></i> <i><del>ii. a QEII covenant; or</del></i> <i><del>iii. a reserve; or</del></i> <i><del>iv. an access; or</del></i> <i><del>v. utility; or</del></i> <i><del>vi. a road."</del></i>