



9 April 2025

Attention: Hearings Administrator
via email: pdp@timdc.govt.nz

Proposed Timaru District Plan – Hearing Stream F: Hazards and Risks (Natural Hazards only) – Other District-wide Matters

Transpower New Zealand Limited (“Transpower”) writes in relation to Hearing Stream F, being the hearing of submissions on the Proposed Timaru District Plan (“Proposed District Plan”) on Hazards and Risks (Natural Hazards only) - Other District-wide Matters, commencing on Tuesday 29 April 2025.

Transpower has reviewed the following reports prepared under Section 42A of the Resource Management Act 1991 (“Officers’ Reports” or “Officer’s Report”), as follows:

- ‘Officer’s Section 42A Report Natural Hazards; Coastal Environment; Drinking Water Protection’ (dated 25 March 2025);
- ‘Officer’s Section 42A Report Activities on the Surface of Water; Public Access; Versatile Soil’ (dated 24 March 2025); and
- ‘Officer’s Section 42A Report Earthworks; Relocated Buildings and Shipping Containers; Signs and Temporary Activities’ (dated 24 March 2025).

Transpower agrees with the recommendations in the Officers’ Reports that are relevant to Transpower’s submission. On this basis, Transpower has elected not to be heard or to file evidence in relation the parts of its submission that are being considered in Hearing Stream F, and instead records its position, including reasons, in respect of the relevant submission points in the table included as **Attachment A** to this letter.

Transpower respectfully requests that this letter, including Attachment A, be provided to Proposed District Plan Hearings Panel during Hearing Stream F in order to confirm its position in relation to the relevant submission points and the Officers’ Report recommendations.

Should the Proposed District Plan Hearings Panel have any questions or require clarification of any matter, please contact Rebecca Eng at environment.policy@transpower.co.nz or 09 590 7072.

Yours faithfully

Rebecca Eng
Technical Lead – Environmental Policy
TRANSPOWER NEW ZEALAND LIMITED

Attachment A: Transpower’s position in relation to the recommendations made in the Officers’ Reports for Hearing F

The following table sets out the relief sought in Transpower’s submission alongside the recommendations in the Officers’ Reports and Transpower’s position in relation to the Officers’ Report recommendations. The relief sought by Transpower in submissions is shown in red underline and ~~red strikethrough~~. Amendments either sought in the primary submission made by other parties or recommended in the Officers’ Reports are shown in black underline and ~~black strikethrough~~.

Submission reference and provision	Relief sought by Transpower	Officers’ Report Recommendation	Transpower’s Position
PART 2 – DISTRICT WIDE MATTERS			
HAZARDS AND RISKS			
NH – Natural Hazards			
159.60 NH – Natural Hazards Objective NH-O2 Regionally Significant Infrastructure	Support in part Amend Objective NH-O2 as follows: “ <u>Risk from natural hazards to</u> Regionally Significant Infrastructure is <u>managed by locating</u> located outside of high hazard areas where practicable.”	The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission be accepted and comments as follows: <i>“7.14.6 Regarding Transpower’s submission [159.60], I consider that the amended wording focusses the objective on risk, which is appropriate. I therefore recommend that this submission is accepted. “</i>	Transpower supports the Officer’s Report recommendation for the reasons given in the Officer’s Report and in Transpower’s submission.
159.61 159.62 NH – Natural Hazards Policy NH-P5 Subdivision and Regionally significant	Oppose Amend Policies NH-P5 and NH-P6 as follows: “NH-P5 Subdivision and Regionally significant Infrastructure in Liquefaction Awareness Areas Require subdivision and Regionally Significant Infrastructure in Liquefaction Awareness Areas to apply appropriate measures to avoid or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigate risks to people and property. “NH-P6 Subdivision and Regionally Significant Infrastructure in Earthquake Fault Awareness Areas	<u>NH-P5</u> The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted and comments as follows: <i>“7.19.7 Regarding the Transpower [159.61] submission, I agree there is overlap across these three policies for RSI. In response to Transpower’s [159.63] submission on NH-P11, I have recommended amending NH-P11 to clarify its</i>	Transpower supports the Officer’s Report recommendation for the reasons given in the Officer’s Report and in Transpower’s submission.

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
<p>Infrastructure in Liquefaction Awareness Areas</p> <p>Policy NH-P6 Subdivision and Regionally Significant Infrastructure in Earthquake Fault Awareness Areas</p>	<p>Require subdivision and Regionally Significant Infrastructure in the Earthquake Fault Awareness Areas overlay to be designed or located in a way that avoids or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigates risks to people and property."</p>	<p><i>application to high hazard areas and other hazard areas. Because of this, I consider that RSI need not be expressly included within NH</i></p> <p><i>P5. Noting my recommended amendments in response to ECan's submission, I recommend that this submission is accepted."</i></p> <p>It is recommended that the policy is amended (or replaced) as follows:</p> <p><i>"NH-P5 Subdivision and Regionally significant Infrastructure in Liquefaction Awareness Areas</i></p> <p>...</p> <p><u><i>Require the liquefaction risk in the Liquefaction Awareness Area Overlay to be identified and appropriately remedied or mitigated."</i></u></p> <p><u>NH-P6</u></p> <p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted and comments as follows:</p> <p><i>"7.20.5 Regarding the Transpower [159.62] submission, I agree there is overlap across these three policies for RSI. In response to Transpower's [159.61] and [159.63] submissions on NH-P5</i></p>	

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
		<p><i>and NH-P11 respectively, I have recommended amending NH-P5 to remove references to RSI and amend NH-P11 to clarify its application to high hazard areas and other hazard areas –</i></p> <p><i>i.e. it now covers all natural hazards. Because of this, I consider that RSI need not be included within NH-P6. I therefore recommend that this submission is accepted.”</i></p>	
<p>159.63</p> <p>NH- Natural Hazards</p> <p>Policy NH-P11 Regionally Significant Infrastructure in Natural Hazard Areas</p>	<p>Support in part</p> <p>Amend Policy NH-P11 as follows: “NH-P11 Regionally Significant Infrastructure in Natural <u>High</u> Hazard Areas Only allow Regionally Significant Infrastructure in Natural <u>High</u> Hazard Areas where:</p> <ol style="list-style-type: none"> 1. it has an operational need or functional need for the location and there are no feasible alternative locations; and 2. it is designed to maintain its integrity and function during and after a natural hazard event, or it is able to be readily re-instated after a natural hazard event; and 3. it is designed and located to ensure that it will not exacerbate the risks or potential adverse effects of the natural hazard on surrounding land.” 	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part and comments as follows:</p> <p><i>“7.24.6 Regarding the Transpower [159.63] submission, I agree that there is some misalignment between NH-P11 and NH-O2. However, the solution proposed by the submitter would remove all policy support for RSI in natural hazard areas other than high hazard areas, and earthquake fault and liquefaction areas. CRPS Policy 11.3.4 requires that new critical infrastructure (which is generally the same as RSI) “will be located outside high hazard areas unless there is no reasonable alternative. In relation to all areas, critical infrastructure must be designed to maintain, as far as practicable, its integrity and function during natural hazard events.” Given this higher order policy, I consider that NH-P11 requires amending to limit the “only allow” direction to high hazard areas as per the submitter’s submission and CRPS Policy 11.3.4. I therefore recommend that NH-P11 is amended as set out below and that this submission is accepted in part.”</i></p>	<p>Transpower supports the Officer’s Report recommendation for the reasons given in the Officer’s Report and in Transpower’s submission.</p>

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
		<p>Recommended amendments to the Policy are as follows: "Only allow Regionally Significant Infrastructure in Natural High Hazard Areas where:</p> <ol style="list-style-type: none"> 1. <u>is only allowed within high hazard areas where it has an operational need or functional need for the location and there are no feasible alternative locations; and</u> 2. <u>for other hazard areas:</u> <ol style="list-style-type: none"> a. <u>it is designed to maintain its integrity and function during and after a natural hazard event, or it is able to be readily re-instated after a natural hazard event; and</u> b. <u>it is designed and located to ensure that it will not exacerbate the risks or potential adverse effects of the natural hazard on surrounding land."</u> 	
<p>159.64 NH- Natural Hazards Rule NH- R5 Regionally Significant Infrastructure – maintenance, replacement and upgrading</p>	<p>Support in part Amend Rule NH-R5 so that the rule applies in the 'High Hazard Area' only.</p> <p>And amend Rule NH-R5 as follows: "NH- R5 Regionally Significant Infrastructure – maintenance, <u>repair</u>, replacement and upgrading</p> <p>and amend rule NH-R5 PER-2 as follows: "The above ground footprint <u>of any structure of the infrastructure</u> is not increased by more than 10%;</p>	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part and comments as follows: <i>"7.31.7 Regarding the Transpower [159.64] submission, I consider repair is within the scope of the existing rule. I consider an amendment to clarify the application of the rule and standard to individual sections of infrastructure is acceptable, however I prefer alternative wording. Accordingly, I recommend that this submission is accepted in part."</i></p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
159.65 NH – Natural Hazards Rule NH-R6 Regionally Significant Infrastructure – New	Support in part Amend Rule NH-R6 as follows: “NH-R6.1 <u>and NH-R6.2</u> does not apply if: 1. the infrastructure is below ground; or 2. above ground infrastructure <u>where any structure is</u> less than 10m ² and is not located within a high hazard area as determined under NH-S1; or 3. the structure is located within a road corridor. NH-R6.4 shall not apply to buildings and infrastructure <u>where any structure is</u> less than 10m ² in area.	The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part and comments as follows: <i>“7.32.10 Regarding the Transpower [159.65] submission, this is consistent with their previous submissions on NH-R5 which I recommended accepting. For the same reasons I recommend that this submission is accepted in part, noting that I am recommending to delete NH-R6.2.”</i>	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.
159.60 NH – Natural Hazards Objective NH-O2 Regionally Significant Infrastructure	Support in part Amend Objective NH-O2 as follows: <i>“Risk from natural hazards to</i> Regionally Significant Infrastructure is <u>managed by locating</u> located outside of high hazard areas where practicable.”	The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission be accepted and comments as follows: <i>“7.14.6 Regarding Transpower's submission [159.60], I consider that the amended wording focusses the objective on risk, which is appropriate. I therefore recommend that this submission is accepted. “</i>	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.
159.61 159.62 NH – Natural Hazards Policy NH-P5 Subdivision and Regionally significant Infrastructure in Liquefaction	Oppose Amend Policies NH-P5 and NH-P6 as follows: “NH-P5 Subdivision <u>and Regionally significant Infrastructure</u> in Liquefaction Awareness Areas Require subdivision <u>and Regionally Significant Infrastructure</u> in Liquefaction Awareness Areas to apply appropriate measures to avoid or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigate risks to people and property. “NH-P6 Subdivision <u>and Regionally Significant Infrastructure</u> in Earthquake Fault Awareness Areas	<u>NH-P5</u> The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted and comments as follows: <i>“7.19.7 Regarding the Transpower [159.61] submission, I agree there is overlap across these three policies for RSI. In response to Transpower's [159.63] submission on NH-P11, I have recommended amending NH-P11 to clarify its application to high hazard areas and other hazard</i>	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report.

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
<p>Awareness Areas Policy NH-P6 Subdivision and Regionally Significant Infrastructure in Earthquake Fault Awareness Areas</p>	<p>Require subdivision and Regionally Significant Infrastructure in the Earthquake Fault Awareness Areas overlay to be designed or located in a way that avoids or, where avoidance is not reasonably practicable due to the functional needs of the activity, mitigates risks to people and property."</p>	<p>areas. Because of this, I consider that RSI need not be expressly included within NH P5. Noting my recommended amendments in response to ECan's submission, I recommend that this submission is accepted."</p> <p>It is recommended that the policy is amended (or replaced) as follows: "NH-P5 Subdivision and Regionally significant Infrastructure in Liquefaction Awareness Areas ... <u>Require the liquefaction risk in the Liquefaction Awareness Area Overlay to be identified and appropriately remedied or mitigated."</u></p> <p><u>NH-P6</u> The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted and comments as follows: <i>"7.20.5 Regarding the Transpower [159.62] submission, I agree there is overlap across these three policies for RSI. In response to Transpower's [159.61] and [159.63] submissions on NH-P5 and NH-P11 respectively, I have recommended amending NH-P5 to remove references to RSI and amend NH-P11 to clarify its application to high hazard areas and other hazard areas – i.e. it now covers all natural hazards. Because of this, I consider that RSI need not be included within NH-P6. I therefore recommend that this submission is accepted."</i></p>	

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
<p>159.63 Hearing F NH- Natural Hazards Policy NH-P11 Regionally Significant Infrastructure in Natural Hazard Area</p>	<p>Support in part Amend Policy NH-P11 as follows: "NH-P11 Regionally Significant Infrastructure in Natural High Hazard Areas Only allow Regionally Significant Infrastructure in Natural High Hazard Areas where:</p> <ol style="list-style-type: none"> 1. it has an operational need or functional need for the location and there are no feasible alternative locations; and 2. it is designed to maintain its integrity and function during and after a natural hazard event, or it is able to be readily re-instated after a natural hazard event; and 3. it is designed and located to ensure that it will not exacerbate the risks or potential adverse effects of the natural hazard on surrounding land." 	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part and comments as follows: <i>"7.24.6 Regarding the Transpower [159.63] submission, I agree that there is some misalignment between NH-P11 and NH-O2. However, the solution proposed by the submitter would remove all policy support for RSI in natural hazard areas other than high hazard areas, and earthquake fault and liquefaction areas. CRPS Policy 11.3.4 requires that new critical infrastructure (which is generally the same as RSI) "will be located outside high hazard areas unless there is no reasonable alternative. In relation to all areas, critical infrastructure must be designed to maintain, as far as practicable, its integrity and function during natural hazard events." Given this higher order policy, I consider that NH-P11 requires amending to limit the "only allow" direction to high hazard areas as per the submitter's submission and CRPS Policy 11.3.4. I therefore recommend that NH-P11 is amended as set out below and that this submission is accepted in part."</i></p> <p>Recommended amendments to the Policy are as follows: "Only allow Regionally Significant Infrastructure in Natural High Hazard Areas where:</p> <ol style="list-style-type: none"> 1. <u>is only allowed within high hazard areas where it has an operational need or functional need for the location and there are no feasible alternative locations; and</u> 2. <u>for other hazard areas:</u> 	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
		<p><i>a. it is designed to maintain its integrity and function during and after a natural hazard event, or it is able to be readily re-instated after a natural hazard event; and</i></p> <p>3. <i>b. it is designed and located to ensure that it will not exacerbate the risks or potential adverse effects of the natural hazard on surrounding land."</i></p>	
<p>159.64 NH- Natural Hazards Rule NH- R5 Regionally Significant Infrastructure – maintenance, replacement and upgrading</p>	<p>Support in part Amend Rule NH-R5 so that the rule applies in the 'High Hazard Area' only.</p> <p>And amend Rule NH-R5 as follows: "NH- R5 Regionally Significant Infrastructure – maintenance, <u>repair</u>, replacement and upgrading</p> <p>and amend rule NH-R5 PER-2 as follows: "The above ground footprint <u>of any structure of the infrastructure</u> is not increased by more than 10%;</p>	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part and comments as follows: <i>"7.31.7 Regarding the Transpower [159.64] submission, I consider repair is within the scope of the existing rule. I consider an amendment to clarify the application of the rule and standard to individual sections of infrastructure is acceptable, however I prefer alternative wording. Accordingly, I recommend that this submission is accepted in part."</i></p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>
<p>159.65 NH – Natural Hazards Rule NH-R6 Regionally Significant Infrastructure – New</p>	<p>Support in part Amend Rule NH-R6 as follows: "NH-R6.1 <u>and NH-R6.2</u> does not apply if:</p> <ol style="list-style-type: none"> 1. the infrastructure is below ground; or 2. above ground infrastructure <u>where any structure is</u> less than 10m² and is not located within a high hazard area as determined under NH-S1; or 3. the structure is located within a road corridor. <p>NH-R6.4 shall not apply to buildings and infrastructure <u>where any structure is</u> less than 10m² in area.</p>	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part and comments as follows: <i>"7.32.10 Regarding the Transpower [159.65] submission, this is consistent with their previous submissions on NH-R5 which I recommended accepting. For the same reasons I recommend that this submission is accepted in part, noting that I am recommending to delete NH-R6.2."</i></p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
NATURAL ENVIRONMENT VALUES			
PA – Public Access			
159.82 PA – Public Access Policy PA-P4 Limiting Public Access	<p>Support Retain Policy PA-P4 as notified.</p>	<p>The Section 42A Report Public Access, Activities on the Surface of Water, and Versatile Soil recommends that the submission be accepted in part. The Report recommends the inclusion of an additional reason/area that might require public access to be limited as follows: <i><u>“h. dunes and estuaries and other sensitive natural areas: or...”</u></i></p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>
GENERAL DISTRICT WIDE MATTERS			
CE- Coastal Environment			
159.84 CE – Coastal Environment Policy CE-P10 Preserving the natural character of the coastal environment	<p>Support in part Amend Policy CE-P10 as follows: “Enable subdivision, use and development outside of areas of coastal high natural character that: <i>x. <u>is regionally significant infrastructure that can demonstrate that adverse effects are managed in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure and EI-Px Managing the effects of the National Grid.</u></i> 1. avoids significant adverse effects; and 2. avoids, remedies or mitigates any other adverse effects on the qualities that contribute to the natural character of the Coastal Environment; while recognising that: a. in rural zoned areas, buildings and structures for non-intensive primary production and residential activities may be appropriate depending on their size, scale and nature;</p>	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted and comments as follows: <i>“8.18.11 Regarding the Transpower [159.84] submission, I note that I have recommended amendments to EI-P2 and an additional EI-PX policy (in response to a separate Transpower's submission) in my EI, TRAN and SW s42A report. On this basis I am comfortable including a cross reference to these policies in CE-P10. Accordingly, I recommend that this submission is accepted.”</i></p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
	<p>b. for existing urban areas, development will likely be appropriate where it is consistent with the anticipated character and qualities of the zone; and</p> <p>c. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure."</p>		
<p>159.85 CE – Coastal Environment CE-P11 Preserve the natural character qualities of areas with coastal high natural character</p>	<p>Support in part Amend Policy CE-P11 as follows: "Only allow subdivision, use and development in areas of Coastal High Natural Character where: 9. for infrastructure, the development is in accordance with EI-P2 Managing adverse effects of Regionally Significant Infrastructure and other infrastructure <u>and EI-Px Managing the effects of the National Grid</u>; and ..."</p>	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted and comments as follows: <i>"8.19.8 Regarding the Transpower [159.85] submission, similar to [159.84], this submission refers to an additional cross reference – "EI-PX Managing the effects of the National Grid". I note that I have recommended amendments to EI-P2 and an additional EI-PX policy (in response to a separate Transpower's submission) in my EI, TRAN and SW s42A report. On this basis I am comfortable including a cross reference to these policies in CE-P11. Accordingly, I recommend that this submission is accepted."</i></p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>
<p>159.86 CE – Coastal Environment Policy CE-P13 Regionally Significant Infrastructure</p>	<p>Support Retain Policy CE-P13 as notified.</p>	<p>The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part on the basis of amendments in response to other submissions.</p>	<p>Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.</p>

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
in Coastal Hazard Areas			
159.87 Coastal Environment Rule CE- R8 Regionally Significant Infrastructure – New	Support Retain Rule CE-R8 as notified.	The Section 42A Report: Natural Hazards, Coastal Environment and Drinking Water Protection recommends that the submission is accepted in part on the basis of amendments in response to other submissions.	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.
EW – Earthworks			
159.88 EW- Earthworks Policy EW-P4 Infrastructure	Support Retain Policy EW-P4 as notified.	The Section 42A Report: Earthworks, Relocated Buildings and Shipping Containers, Signs and Temporary Activities recommends that the submission be accepted and that the Policy be retained.	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.
159.89 Hearing F EW – Earthworks Standard EW-S5	Support in part Delete Standard EW-S5 and include direction to Rule EI-R28.	The Section 42A Report: Earthworks, Relocated Buildings and Shipping Containers, Signs and Temporary Activities recommends that the submission be accepted in part and comments as follows: <i>"9.9.6 While I acknowledge that there is stronger policy direction in the PDP and NPSET in relation to the National Grid, the National Grid and the electricity transmission network are both identified as RSI in the CRPS. Mr. Willis, in his analysis of the EIT chapters (Hearing E), has also recommended that the electricity transmission network is</i>	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.

Submission reference and provision	Relief sought by Transpower	Officers' Report Recommendation	Transpower's Position
		<p><i>included in the definition of RSI. I therefore do not agree with Hort NZ [254.80] that there is no policy framework to support the inclusion of 66Kv electricity distribution lines in PDP. EW-P4 (Infrastructure), for example, is clear that all RSI is to be protected from the adverse effects of earthworks. EI-P3 (Adverse effects on RSI) also seeks for incompatible activities to be appropriately located to ensure they do not constrain the safe, effective and efficient operation, maintenance, repair, development or upgrading of any RSI or lifeline utility.</i></p> <p><i>9.9.7 Additionally, the New Zealand Electrical Code of Practice for Electrical Safe Distances 2001 (the Code) contains restrictions on excavation in relation to both the National Grid and other electricity distribution lines and does not distinguish between 66Kv and 110kv lines. The purpose of the Code, and the excavation setbacks, is to protect persons, property and equipment from harm or damage from electric hazards; to ensure any excavation does not compromise the structural integrity of the overhead electric line; and to ensure the support structure can be accessed for inspection and maintenance. I therefore recommend the submission point from Hort NZ [254.80] be rejected.</i></p> <p><i>9.9.8 I agree with Transpower [159.89] that there is potential overlap between EW-S5 and EI-R28 in respect of the National Grid, with both the rule and standard containing similar but slightly different earthwork controls. However, it is my understanding that EW-S5 and EI-R28 are intended to manage earthworks in proximity to different electricity distribution lines. I therefore do not agree with Transpower [159.89] that EW-S5 should be deleted in its entirety.</i></p>	

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		<p><i>9.9.9 EI-R28 applies to any earthworks within the National Grid Yard which is defined in the PDP as follows:</i></p> <ul style="list-style-type: none"> <i>a. the area of land located within 10m of either side of the centreline of an above ground 110Kv electricity line on single poles;</i> <i>b. the area within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is 110Kv or greater; and</i> <i>c. the area located within 12m in any direction from the outer visible edge of an electricity transmission pole or tower foundation, associated with a line which is 110Kv or greater.</i> <p><i>9.9.9 EW-S5, applies to any earthworks in proximity to other assets used or owned by Transpower that form part of the National Grid but are outside the National Grid Yard, including designated transmission lines less than 110Kv. EW-S5, also applies to other 66Kv electricity distribution lines not owned or operated by Transpower.</i></p> <p><i>9.9.10 Based on the above, I recommend amendments to EW-S5 to ensure the standard only applies to earthworks in proximity to 66Kv electricity distribution lines and does not capture earthworks within the National Grid Yard. I also recommend that a note for plan users is included in EW-S5 to make it clear that any earthworks undertaken within the National Grid Yard are to be assessed in EI-R28. I therefore recommend the submission from Transpower [159.89] be accepted in part.</i></p> <p><i>9.9.11 The above recommendations are anticipated to alleviate the concerns of Federated Farmers [182.177] as the 12m setback in EW-S5 only applies to National Grid support structures and does not apply to 66Kv transmission lines. I also note that Mr. Willis, in his</i></p>	

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		<p><i>analysis of the EIT provisions, has recommended that EI-R28 is amended to permit earthworks within the National Grid Yard, where earthworks or land disturbance is no greater than 300mm deep within 6 metres of the outer visible edge of a foundation of a National Grid transmission line tower or pole. I therefore recommend the submission point from Federated Farmers [182.177] be accepted in part."</i></p>	
SIGN – Signs			
159.90 SIGN – Signs Rule SIGN-R1 Official sign	Support Retain as Rule SIGN-R1 as notified	The Section 42A Report: Earthworks, Relocated Buildings and Shipping Containers, Signs and Temporary Activities recommends that the submission be accepted and that the Policy be retained.	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.
TEMP – Temporary activities			
159.91 TEMP - Temporary Activities Rules Note	Support Retain the 'Note' that accompanies the rules for temporary activities as notified.	The Section 42A Report: Earthworks, Relocated Buildings and Shipping Containers, Signs and Temporary Activities recommends that the submission be accepted and that the Policy be retained.	Transpower supports the Officer's Report recommendation for the reasons given in the Officer's Report and in Transpower's submission.