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Taupō District Council
 Private Bag 2005
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Via email: crobinson@taupo.govt.nz floodhazard@taupo.govt.nz

Dear Sir/Madam

**Taupō District Plan
 PROPOSED PLAN CHANGE 34 – FLOOD HAZARD**

**Submitter Reference: Transpower NZ Ltd (OS22 and Further
 Submitter reference FS26)**

Transpower New Zealand Limited (“Transpower”) is the State Owned Enterprise that plans, builds, maintains and operates New Zealand’s high voltage transmission network (the National Grid) which links generators to distribution companies and major industrial users. The National Grid, which extends from Kaikohe in the North Island down to Tiwai in the South Island, transports electricity throughout New Zealand.

The National Grid comprises some 12,000 km of transmission lines and 167 substations. This is supported by a telecommunications network of some 300 telecommunication sites that link together the components that make up the National Grid.

Transpower’s assets within the Taupō District include:

- Aratiatia - Wairakei A 220kV single circuit transmission line on towers;
- Atiamuri - Tarukenga A 220kV double circuit transmission line on towers;
- Brownhill - Whakamaru North A 400kV double circuit transmission line on towers;
- Bunnythorpe - Whakamaru A 220kV single circuit transmission line on towers;
- Bunnythorpe - Whakamaru B 220kV single circuit transmission line on towers;
- Bunnythorpe - Wairakei A 220kV single circuit transmission line on towers (BPE-WRK A);
- Maraetai - Whakamaru A 220kV single circuit transmission line on towers;

- Maraetai - Whakamaru B 220kV single circuit transmission line on towers;
- Maraetai - Waipapa A 220kV single circuit transmission line on towers;
- Ohakuri - Edgecumbe A 220kV single circuit transmission line on towers;
- Ohaaki - Wairakei A 220kV double circuit transmission line on towers;
- Otahuhu - Whakamaru A 220kV single circuit transmission line on towers
- Otahuhu - Whakamaru B 220kV double circuit transmission line on towers;
- Otahuhu - Whakamaru C 220kV double circuit transmission line on towers;
- Poihipi - Te Mihi A 220kV single circuit transmission line on towers;
- Rangipo - Deviation A 220kV double circuit transmission line on towers;
- Te Mihi - Deviation A 220kV single circuit transmission line on towers;
- Wairakei - Whirinaki A 220kV double circuit transmission line on towers;
- Wairakei - Whakamaru A 220kV single circuit transmission line on towers;
- and
- Wairakei - Whakamaru C 220kV double circuit transmission line on towers.

In addition, Transpower operates substations at Tokaanu, Rangipo, Whakamaru, Whakamaru North, Te Mihi, Atiamuri, Wairakei, Poihipi, Maraetai, Nga Awa Purua, Ohakuri, Ohaki, and Aratiatia.

The only existing Transpower assets within the flood hazard areas identified and subject to Plan Change 34 are at Hatepe where the 220kV BPE-WRK A line traverses the Hinemaiaia River (noting there are no National Grid support structures located within the river or identified flood area). The Transpower assets at Tokaanu are not within the identified flood hazard areas. However, while Transpower has limited existing assets directly subject to Plan Change 34, it does have wider interests in the plan change to ensure the proposed plan change recognises and provides for any new National Grid infrastructure that is required to be located in the flood areas. Such recognition would be consistent with the National Policy Statement for Electricity Transmission 2008 (“NPSET”) in particular Policy 3 which acknowledges the National Grid is subject to technical and operational requirements and these can include locational constraints.

Section 42A Officers Report Recommendations and Transpower’s Response

The following comments are specific to the recommendations on submission points sought by Transpower.

Recommendations supported

Submission Reference: OS22.4 – OS22.12

Plan Provision: Flood Hazard Area 4e.9.1-4e.9.8

s.42A Report: Issue 5, Section 8

In its submission Transpower sought deletion of the following text from rules 4e.9.1 - 4e.9.8: “(excluding those associated with infrastructure)”.

Transpower accepts the recommendation by the reporting officer to reject the submission point on the basis that the rules will need to be able to be read independently and stand-alone given anticipated e-plan requirements.

Submission Reference: OS22.13 – OS22.15

Plan Provision: Flood Hazard area rules 4e.9.13-4e.9.15

s.42A Report: Issue 5, Section 9

In its submission Transpower supported rules 4e.9.13 - 4e.9.15.

Transpower supports the officer recommendation for the retention of the rules as they appropriately recognise the requirements of subdivision for infrastructure.

Submission Reference: OS22.1

Plan Provision: Flood Hazard area rules “Infrastructure” 4e.9.16-4e.9.18.

s.42A Report: Issue 5, Section 6

In its submission Transpower sought deletion of the statement “The provisions of the National Environmental Standards for Telecommunication Facilities (“NESTF”) prevail over the following Infrastructure rules” before rule 4e.9.16 and replace it with a clearer statement of intent for the purpose of these rules.

The submission is accepted in part by the reporting officer in that while the statement is not deleted, it is amended. On the basis the recommended amendment address Transpower concerns, Transpower accepts the officer recommendation. As recommended, it is now clear the NESTF only applies where applicable.

Submission Reference: OS22.16

Plan Provision: Flood Hazard area rules “Infrastructure” 4e.9.16

s.42A Report: Issue 5, Section 11

In its submission Transpower sought the retention of rule 4e.9.16.

Transpower supports the officer recommendation for the retention of the rule as it appropriately recognises the operation, maintenance and upgrade of the National Grid as required by the objective of the National Policy Statement on Electricity Transmission (“NPSET”).

Submission Reference: OS22.2

Plan Provision: Flood Hazard area rules “Infrastructure” 4e.9.16 note

s.42A Report: Issue 5, Section 8

In its submission Transpower sought retention of the note under rule 4e.9.16 that states “For rule 4e.9.16 electricity transmission activities mean part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.”

Transpower supports the officer recommendation for the retention of the note

as it provides clarity and will assist in plan interpretation and application.

Submission Reference: OS22.3

Plan Provision: Flood Hazard area rules “Infrastructure” 4e.9.18

s.42A Report: Issue 5, Section 11

In its submission Transpower sought amendment to rule 4e.9.18 as follows: Any new above ground infrastructure (and buildings that enclose them), in any flood hazard area, that ~~does~~ is not permitted by ~~comply~~ with rule 4e.9.18 is a restricted discretionary activity with the matters of discretion restricted to:...

Transpower supports the officer recommendation to accept the submission point and amend the rule as sought in the Transpower submission. The amendment will assist in plan interpretation.

Further Submission Points

Transpower lodged eight further submission points (FS26.1 – FS26.8). Having read and considered the s42A reporting officer recommendations on the submission points, Transpower accepts the reporting officer recommendations.

Hearing Appearance

Given the support given to the relevant officer recommendations relating to Proposed Plan Change 34 – Flood Hazard, Transpower does not propose to present evidence on these matters at the hearing. However, if the Hearing Panel considers it useful for Transpower to appear before it to explain and answer any questions on the above we would be more than happy to do so.

Transpower requests this letter be tabled at the hearing in support of its submission points and the Section 42A Report recommendations as outlined above.

Transpower wishes to express its appreciation for the due consideration given by the reporting officer to Transpower’s submission points.

Should you require clarification of any matter, please contact Rebecca Eng at Transpower (09 590 7072), or on the following email: Rebecca.Eng@transpower.co.nz

Yours faithfully



Rebecca Eng
Senior Environmental Planner