

Response ID ANON-URZ4-5FQB-3

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 14:15:21

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
Transpower New Zealand Limited

2 Contact person

Contact person name:  
Jo Mooar

3 What is your job title

Job title:  
Senior Corporate Counsel

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
Waikoukou  
22 Boulcott Street  
PO Box 1021  
Wellington

7 Is your address for service different from your postal address?

No

Organisation:  
Transpower New Zealand Limited

Contact person:  
Jo

Phone number:  
s 9(2)(a)

Email address:  
s 9(2)(a)

Job title:  
Senior Corporate Counsel

Please enter your service address:  
  
Waikoukou, 22 Boulcott Street, PO Box 1021, Wellington

Section 1: Project location

Site address or location

Add the address or describe the location:

See the attached map. The majority of the works would occur inside the red hatched line, and line relocation being outside this area across to the existing tower. Access to the project site may be via town belt land adjacent to the site.

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CPK indicative construction footprint.pdf was uploaded

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Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

CPK Records of Title combined.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

92 and 96 Nairn Street – Channary Nguon  
67 Brooklyn Road – The Student Christian Movement Investment Trust Incorporated  
Eastern side of Brooklyn Road (as shown on attached plans) – Wellington City Council (WCC)

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Transpower is the owner of Central Park substation, held in Certificate of Title WN38A/542. Transpower would need to acquire 92/96 Nairn Street and 67 Brooklyn Road before the works could be undertaken. Transpower is in discussions with the owners of these properties about acquiring the properties. Transpower may also need to obtain a licence or other access right to make use of the town belt land. We are soon to have discussions with WCC regarding the use of the town belt land.

## Section 2: Project details

What is the project name?

Please write your answer here:

Central Park Resilience Project

What is the project summary?

Please write your answer here:

This project is to develop a secondary indoor substation in proximity to the Central Park substation, with line connections to the existing substation and line. Associated works will include site preparation, including demolition of dwellings, vegetation removal, earthworks, and establishing access for construction.

What are the project details?

Please write your answer here:

The purpose of the project is to increase resilience and reliability of electricity supply to Wellington City. The existing Central Park Substation supplies much of Wellington's City Centre, and all of the southern and eastern Wellington. It also supplies the central business district, the government precinct, Wellington Regional Hospital, Wellington Domestic and International Airports, as well as the City's principal sewage and wastewater treatment plants, a network of water storage and pumping facilities, telecommunication systems, and refuelling services. A failure at the Central Park Substation would have a significant impact.

The existing Substation is vulnerable to a high impact low probability event, such as an earthquake or fire. The City could be left without electricity for extended periods (estimated to be 7-10 days), should an event occur. The Project, with its secondary substation, would address these issues.

The project objective is:

To designate a site for the construction, operation, maintenance, upgrade, development, and protection of a new 110kV/33kV secondary substation and associated transmission grid connections in a way that secures the long-term resilient and reliable supply of electricity to Wellington City and provides operational flexibility to allow future local and regional demand for electricity to be met.

The project would involve:

Relocation of the conductors from existing tower 29 on the Central-Park-Wilton 110kV line (CPK-WIL B line) to a new steel pole termination structure at the secondary substation site. At this stage, strengthening of the existing structure is not anticipated to be necessary.

Construction of the secondary substation, including cut and fill and retaining walls. The substation equipment will include transformers and circuit breakers, switchboards, secondary systems, and feeder cables. The equipment will be housed indoors, in a purpose-built building. Both permanent and temporary access to the site may be via the Town Belt land/road reserve off Brooklyn Road, and via the existing maintenance accessway to the existing substation.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Construction activities on site will be split into earthworks, civil works and electrical works. Construction works are expected to take approximately 12 months, broken down as follows:

- 1 month for site establishment
- 1 month for earthworks
- 5 months for civil works
- 4 months for electrical works
- 1 month for site dis-establishment.

NOTE - Transpower has sought that the project be on the A List.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act approvals are required. It is possible that an archaeological authority may be required under the Heritage New Zealand Pouhere Taonga Act and a permit under the Wildlife Act. Approval for permanent and temporary use of the Town Belt, under the Town Belt Act may also be required.

It is too early to determine whether acquisition under the Public Works Act would need to be accessed.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Wellington City Council and Wellington Regional Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No applications have been made for the same or similar project.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

No, Transpower is seeking all necessary approvals for its project. The broader resilience project will involve works by WE\*, as it takes electricity from the substation.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Transpower anticipates that the following high level timeline for key milestones:

Funding confirmed: October 2024

Procurement. October 2024

Detailed design to be carried out in the first half of 2025

Site works commence: Third quarter of 2025

Works completed: end of the first quarter of 2027

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Wellington City Council (WCC)

Port Nicholson Block Settlement Trust – for Taranaki Whaanui

Te Runanga o Toa Rangatira Inc

Owners of properties referred to in section 2.

Owners and occupiers of the properties adjoining the project site.

Renouf Tennis Club and any occupiers of the wider complex

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Given the early stage of the project, limited consultation and engagement has occurred. A milestone of the project – preferred site identification - has only recently been completed through a multi-criteria analysis. Because the outcome of that is the development of a site directly adjacent to the existing site, the public and community impact will be limited.

The project has also been informed by discussions with WCC. Transpower met with WCC to discuss possible use of land held under the Town Belt Act for the satellite substation. WCC advised that use of Town Belt land would not be possible when other alternatives existed. As a result, Town Belt land was excluded from the short-listed options, with the exception of the small developed portion of land referred to above.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

No processes have been undertaken under the Public Works Act. As discussed in response to section 2, Transpower has engaged with some neighbouring landowners in relation to acquisition of their land.

#### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Port Nicholson Block (Taranaki Whānui ki te Upoko o te Ika) Area of Interest as shown in its Treaty settlement includes the geographical location of the project. However, there are no relevant provisions in this settlement or statutory acknowledgement areas that apply to the project.

The Ngāti Toa Rangatira Area of Interest as shown in its Treaty settlement includes the geographical location of the project. However, there are no relevant provisions in this settlement or statutory acknowledgement areas that apply to the project.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

No. The project is not located in the Ngāti Porou rohe.

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

There are no identified parcels of Māori land or marae within the vicinity of the Central Park substation. There is a wāhi tapu site on the southern side of Nairn Street. This is Ngā Kumikumi Ngakinga which is a clearing in the bush, considered Category B – of medium significance in the Wellington City Council proposed district plan. This site is some distance from the proposed construction works (being separated from the proposed construction works by the existing substation and Nairn Street).

NOTE - in relation to the question immediately below - the project is not on land returned under the Treaty. However, the substation land (RT WN38A/542) has a memorial noting that the land is a right of first refusal property for Port Nicholson Block iwi, if the land is ever surplus. None of the properties to be acquired have such a memorial.

NOTE - in relation to 2 questions down - we have answered "no." However, "not applicable" is more appropriate.

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

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## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Given the stage of the project, an assessment of environmental effects has not been undertaken. However, experts have been involved in the site selection process. At this stage, we anticipate that adverse effects of the project will include both temporary and permanent effects. Temporary effects during construction will include earthworks (between approximately 3000-4000m<sup>2</sup>), noise from construction activities and traffic closures on Brooklyn Road and potentially adjoining streets. These effects will be managed, including through use of construction hours and construction and traffic management plans. Permanent effects are anticipated to include removal of vegetation, including indigenous vegetation, operational noise from the site, visual effects/urban design effects due to the sites urban location, stormwater/drainage effects. The main means of avoiding and mitigating these temporary and permanent effects is through the site selection process. For Transpower's preferred site, the choice of indoor substation avoids or mitigates the permanent effects. Stormwater and drainage effects will be managed onsite.

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## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The National Policy Statement on Electricity Transmission 2008 (NPSET) confirms the national significance of the Grid. The NPSET objective is to: "Recognise the national significant 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 requires decision-makers to recognise and provide for the national, regional and local benefits of electricity transmission, to recognise and provide for the effective operation and development of the network while managing the environmental effects. Policy 3 and 4 are relevant to this consideration. When considering the adverse effects of a project, decision-makers must consider the constraints imposed by the technical and operational requirements of the network (policy 3) and the extent that adverse effects have been avoided, remedied and mitigated through the site, route and method selection process (policy 4). The project area is constrained, due to its proximity to the built environment and the Town Belt. The Central Park Substation site is also constrained. Transpower has carried out a robust alternatives assessment, that has determined a secondary substation in the vicinity of the existing site to be preferred. In doing so, the adverse effects of the project have been avoided and reduced. Policy 7 of the NPSET provides that: "Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities." Through the alternatives process Transpower has avoided and/or minimised the adverse effects on the environments covered by policy 7. It is also proposed that the secondary substation be indoors, further minimising the effects on the neighbouring environment. Further, the existing sensitive activities will be removed from the lots proposed to be acquired. The project is consistent with the NPSET. The National Policy Statement on Urban Development Capacity (NPSUD) is also relevant, as it addresses urban environments. Objective 1 of the NPSUD is "well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future." Objective 4 recognises that New Zealand's urban environments, including their amenity values, develop and change over time in response to diverse and changing needs of people, communities and future generations. The project, being focussed on a resilient electricity supply to Wellington City, is critical to the wellbeing of people and communities. The amenity of the area will change, with the increased infrastructure, and removal of several houses. However, overall, we consider that the project is consistent with the NPSUD. The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA) provides a nationally consistent rule framework for works on National Grid lines existing at 14 January 2010. It does not apply to substations.

The NESETA specifies the resource consent requirements for the works on tower 29 and the relocation of the conductor (wires). The NESETA does not include objectives and policies.

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) applies to works in substations. The NES Soil provides a nationally consistent rule framework for the development of land affected by contaminants in soil. The NES Soil manages the human health effects of contaminants in soil, and regional rules relating to discharges of contaminants may also apply. The NES Soil may be triggered if any ancillary earthworks occur on the existing site.

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

At this stage of the project, we anticipate that processing via the fast-track process will result in more timely and cost-efficient way than usual processes. This is particularly the case given approval is likely under more than one legislative regime.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

We have no visibility of the number of projects that will apply to make use of the fast-track process, and so it is difficult to answer this question. We assume, given the importance of this Project to the ongoing resilience of the electricity supply to the Wellington CBD, that it is the type of project that could be efficiently processed via the fast-track process.

Has the project been identified as a priority project in a:

Other

Please explain your answer here:

The need for enhanced resilience at the Central Park site has been identified as one of the priorities for the Wellington Lifelines Group's Regional Resilience Project. (See Protecting Wellington's Economy Through Accelerated Infrastructure Investment Programme Business Case, prepared for the Wellington Lifelines Regional Resilience Project (Wellington Region Emergency Management Office), 4 October 2019.)

In addition, WE\* have included the project in their 2024 10 Year Asset management Plan – as follows:

"The evaluation of solutions with Transpower on the options to manage the single point of supply risk of the Central Park grid exit point in Brooklyn. The project is now moving ahead with Transpower establishing a project team to deliver the project by February 2027;"

It is also referred to in the Wellington Regional Investment Plan <https://wrlc.org.nz/wp-content/uploads/2024/03/WRIP-Final.pdf>

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The project will facilitate the delivery of nationally and regionally significant infrastructure. The Central Park Substation supplies much of Wellington's City Centre, and all of the southern and eastern Wellington. It also supplies the central business district, the government precinct, Wellington Regional Hospital, Wellington Domestic and International Airports, as well as the City's principal sewage and wastewater treatment plants, a network of water storage and pumping facilities, telecommunication systems, and refuelling services. A failure at the Central Park Substation would have a significant impact.

The existing Substation is vulnerable to a high impact low probability event, such as an earthquake or fire. Such an event could leave the City without electricity for extended periods (estimated to be 7-10 days). The Project, with its secondary substation, would address these issues.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

Yes, the increased resilience at the Central Park site will contribute to the ongoing functioning of the urban environment. See answer to previous question.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

See answer 2 questions above.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The project will support climate change mitigation by providing a more resilient electricity supply to Wellington City, and its surrounding suburbs. A more resilient electricity supply will also enable electrification, including of industrial processes and the transport fleet.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

Yes - see answer to question about whether the project is of national or regional significance.

Will the project address significant environmental issues?

No

Please explain your answer here:

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

It is difficult to determine whether the project is consistent with the various local and regional planning documents without a full planning assessment of each document, which will follow as part of the substantive application.

However, we note that the project is not named in any local or regional planning document. However, all local and regional planning documents contain objectives and policies in relation to enabling regional and nationally significant infrastructure, including the National Grid. See answer to question above about the regional and national significance of the project.

Anything else?

Please write your answer here:

Does the project include an activity which would make it ineligible?

No

If yes, please explain:

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The project will be affected by climate change, in the sense that there will be more frequent and extreme weather events in all parts of the country. Other than these generic effects, we are not aware of any specific effects in relation to the Project Area.

One of the reasons for the project is to make the site more resilient in the face of high impact low probability event, including earthquakes. We are not aware of any reason why the preferred site for the secondary substation would be impacted to a greater extent than elsewhere in the project area or Wellington more generally.

We further note that Transpower is a lifeline utility under the Civil Defence and Emergency Management Act 2002. Accordingly, in an emergency event, Transpower is required to continue functioning to the greatest extent possible, both during and after the event. Transpower designs all new infrastructure to withstand emergency events in accordance with international best practice, high design specifications and Transpower's civil defence responsibilities. All components of the secondary substation are designated to withstand all natural hazards, including a 1:2500 earthquake event and significant storm events that are likely to occur during the design life of the site.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

The only known compliance/enforcement actions within the last 14 years are:

Auckland Council – July 2011 – Abatement and Infringement Notice – for works in the bed of a waterbody (removal of a culvert) without appropriate erosion and sediment controls and works methodology. No further enforcement action was taken.

Waikato Regional Council – December 2013 – Infringement Notice for use of land (earthworks) contravening a regional rule. No further enforcement action taken.

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## Declaration

Do you acknowledge your submission will be published on [environment.govt.nz](http://environment.govt.nz) if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Jo Mooar

Important notes