

8 November 2022

District Plan Review
Gore District Council
PO Box 8
GORE 9740

Via email: draftdistrictplan@goredc.govt.nz

Dear Sir/Madam,

RE: FEEDBACK ON THE DRAFT GORE DISTRICT PLAN

PowerNet Limited ("PowerNet") appreciates the opportunity to provide feedback to the Gore District Council ("Council") on the Draft Gore District Plan ("Draft Plan"), and advise on its intention to roll over its designations.

PowerNet is an electricity network management company, first established in 1994 by network owners Electricity Invercargill Limited ("EIL") and The Power Company Limited ("TPCL") to develop, manage and maintain their electricity network assets such as lines, poles, cables, substations and other equipment, in a cost-effective way. PowerNet is a network utility operator. Network utility operators are defined in the Resource Management Act 1991 ("the Act") and specifically include electricity operators or electricity distributors for the purpose of line function services.

The electricity network owned by PowerNet in the Gore District comprises high voltage (HV) power lines (above and below ground) which distribute electricity to local zone substations where the voltage is reduced before distribution through medium voltage (MV) power lines (overhead and underground).

The comments on the Draft Plan set out planning provisions for the management of PowerNet's lines network which PowerNet seeks to be incorporated into the Gore District Plan. The purpose of the proposed provisions is to protect the lines network from reverse sensitivity effects and activities that may damage or adversely impact upon the conveyance of electricity. Similar provisions are now included in other district plans around the country, and they provide:

- Recognition of the electricity distribution lines network in the District Planning Maps;

- The inclusion of new definitions to define the Electricity Distribution Network, and definitions to define a corridor protection area beneath the lines: Electricity Distribution Yard;
- New rules that set out permitted activities within the Yard.

The provisions proposed for the management of PowerNet's network are set out in Attachment 1 to this letter. This attachment also includes comments on other provisions of the Infrastructure Chapter of the Draft Plan.

Designations

PowerNet¹ has **four** designations in the Gore District Plan, which are described in the table below:

Table 1: PowerNet's designations in the Gore District Plan.

The Power Company Designations	D25 North Gore	D26 South Gore	D27 Mataura	Waikaka
Designated Purpose	Network Utility – electricity substation purposes	Network Utility – electricity substation purposes	Network Utility – electricity substation purposes	Network Utility – electricity substation purposes
Subject of Designation	North Gore Substation	South Gore Substation Lot 1 DP 14629	Mataura Substation Sec 1 SO 7222	Waikaka Substation
Locality Legal description	57 Reaby Road, Gore, Sec 1 SO 7870	7A Oreti Street, Gore	52 Old Coach Road, Mataura	Section 109 Block 14 Chatton Survey District
Conditions	None	None	None	Yes – See below*

* Conditions attached to the Waikaka Substation Designation:

1. The height of any new structures (excluding overhead line support structures/poles and communications equipment masts) associated with the reception, transformation and distribution of electrical power must not exceed 12 metres.

¹ The Requiring Authority is The Power Company Limited. The Power Company Limited is a subsidiary of PowerNet. No changes to the name of the requiring authority of these designations is sought.

2. *The strength of electric and magnetic fields generated by infrastructure located at the site must comply with NZS 2772.1:1999 Radiofrequency Fields Part 1: Maximum exposure levels 3 kHz –300 GHz (“the New Zealand Standard”).*
3. *Any new noise generating equipment installed after 18 April 2019 must not exceed the following noise limits, measured at or within the notional boundary² of any residential building not on the same site and that is lawfully established on 18 April 2019:*

<i>Between the hours of 7:00 am and 10:00 pm</i>	<i>55 dBA Leq</i>
<i>Between the hours of 10:00 pm and 7:00 am the following day</i>	<i>40 dBA Leq</i>
<i>Between 10:00pm on any night and 7:00am the following day</i>	<i>75 BA Lmax</i>

All measurements must be undertaken in accordance with NZS 6801:1991 “Measurement of Sound” (or subsequent amendments).
4. *Where existing site noise already exceeds the levels in condition 3 above, then any new noise generating equipment (excluding any electricity equipment required for emergency backup power generation) must cumulatively in combination with any other noise generating equipment on the site not result in any increase in existing noise levels received at any other property.*
5. *Where existing site noise already exceeds the levels in condition 3, or where the installation of noise generating equipment results in an increase in noise from the site, an Outline Plan shall be submitted to the Gore District Council, together with a report from an appropriately qualified and experienced acoustics engineer confirming the existing noise levels and predicted new noise levels.*
6. *Construction noise must comply with the New Zealand Standard for Acoustics –Construction Noise (NZS 6803: 1999).*
7. *The existing three-metre-wide landscaping strip along the southern boundary of the site must be retained and maintained.*

PowerNet requests that the following designations are rolled over without amendment:

- North Gore Substation;
- South Gore Substation; and
- Mataura Substation.

PowerNet requests that the designation for Waikaka Substation is rolled over. However, it seeks changes to the conditions of the designation, as set out below:

1. *The height of any new structures (excluding overhead line support structures/poles and communications equipment masts) associated with the reception, transformation and distribution of electrical power must not exceed 12 metres.*
2. *The strength of electric and magnetic fields generated by infrastructure located at the site must comply with NZS 2772.1:1999 Radiofrequency Fields Part 1: Maximum exposure levels 3 kHz –300 GHz (“the New Zealand Standard”).*

² ‘Notional boundary’ in respect of a residential activity means a line 20 meters from the façade of the building or the legal boundary of the site on which the building is located where the boundary is closer to the building than 20 metres.

3. Any new noise generating equipment installed after 18 April 2019 must not exceed the following noise limits, measured at or within the notional boundary³ of any residential building not on the same site and that is lawfully established on 18 April 2019:

Between the hours of 7:00 am and 10:00 pm	55 dBA Leq
Between the hours of 10:00 pm and 7:00 am the following day	40 dBA Leq
Between 10:00pm on any night and 7:00am the following day	75 BA Lmax

All measurements must be undertaken in accordance with NZS 6801:1991 “Measurement of Sound” (or subsequent amendments).

4. Where existing site noise already exceeds the levels in condition 3 above, then any new noise generating equipment (excluding any electricity equipment required for emergency backup power generation) must cumulatively in combination with any other noise generating equipment on the site not result in any increase in existing noise levels received ~~at any other property boundary~~ measured at or within the notional boundary⁴ of any residential building not on the same site and that is lawfully established on 18 April 2019.
- ~~5. Where existing site noise already exceeds the levels in condition 3, or where the installation of noise generating equipment results in an increase in noise from the site, an Outline Plan shall be submitted to the Gore District Council, together with a report from an appropriately qualified and experienced acoustics engineer confirming the existing noise levels and predicted new noise levels.~~
6. Construction noise must comply with the New Zealand Standard for Acoustics –Construction Noise (NZS 6803: 1999).
7. The existing three-metre-wide landscaping strip along the southern boundary of the site must be retained and maintained.

PowerNet is aware that the changes to conditions for the Waikaka designation will require alteration via a formal process.

Infrastructure Chapter of the Draft Plan

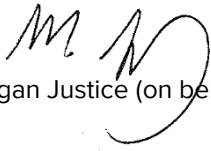
PowerNet’s feedback on the Draft Plan Infrastructure Chapter is relatively high level, and seeks primarily to ensure some corridor protection is provided for PowerNet’s important lines network. PowerNet’s feedback on the Draft Plan is set out in **Attachment 1** to this document. As provisions for ‘Ecosystems and Indigenous Biodiversity’ and ‘Natural Features and Landscapes’, and associated mapping, are not included in the Draft Plan, PowerNet reserves the right to comment on these provisions when they become available.

If the Council has any questions or requires further information in relation to these comments, please contact the undersigned.

³ ‘Notional boundary’ in respect of a residential activity means a line 20 meters from the façade of the building or the legal boundary of the site on which the building is located where the boundary is closer to the building than 20 metres.

⁴ ‘Notional boundary’ in respect of a residential activity means a line 20 meters from the façade of the building or the legal boundary of the site on which the building is located where the boundary is closer to the building than 20 metres.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'M J' with a large, sweeping flourish at the end.

Megan Justice (on behalf of PowerNet Limited)

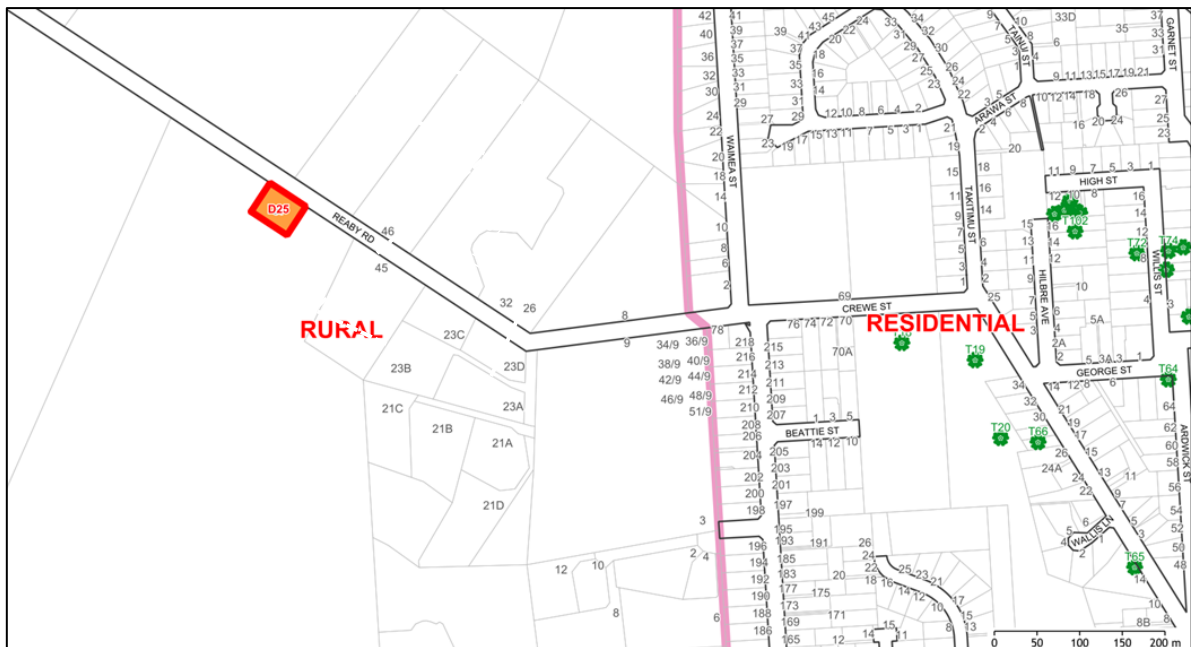


Figure 1: Operative District Plan Map of D25 – North Gore

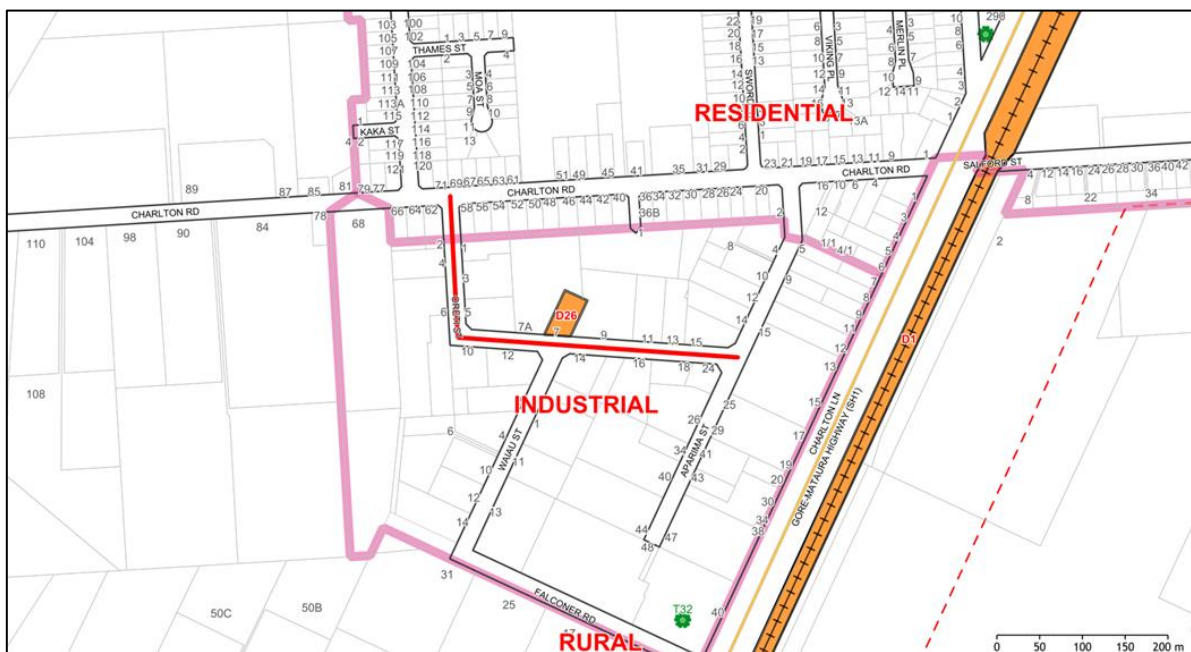


Figure 2: Operative District Plan Map of D26 – South Gore

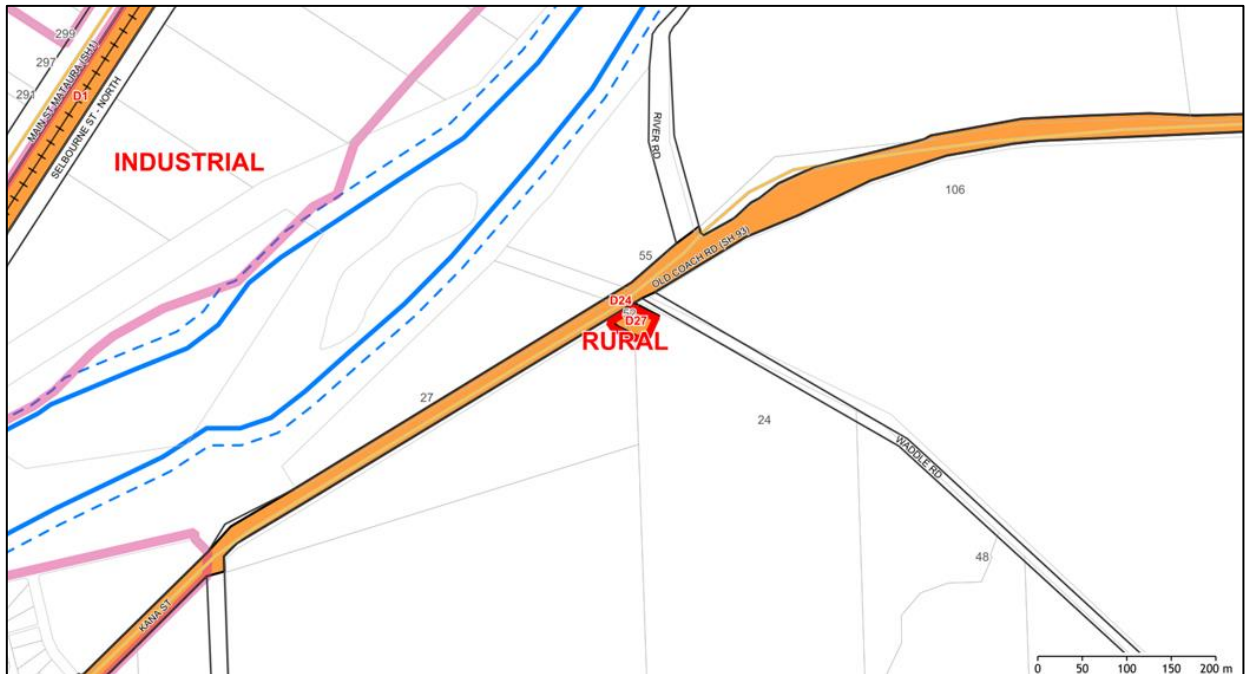


Figure 3: Operative District Plan Map of D27 – Mataura

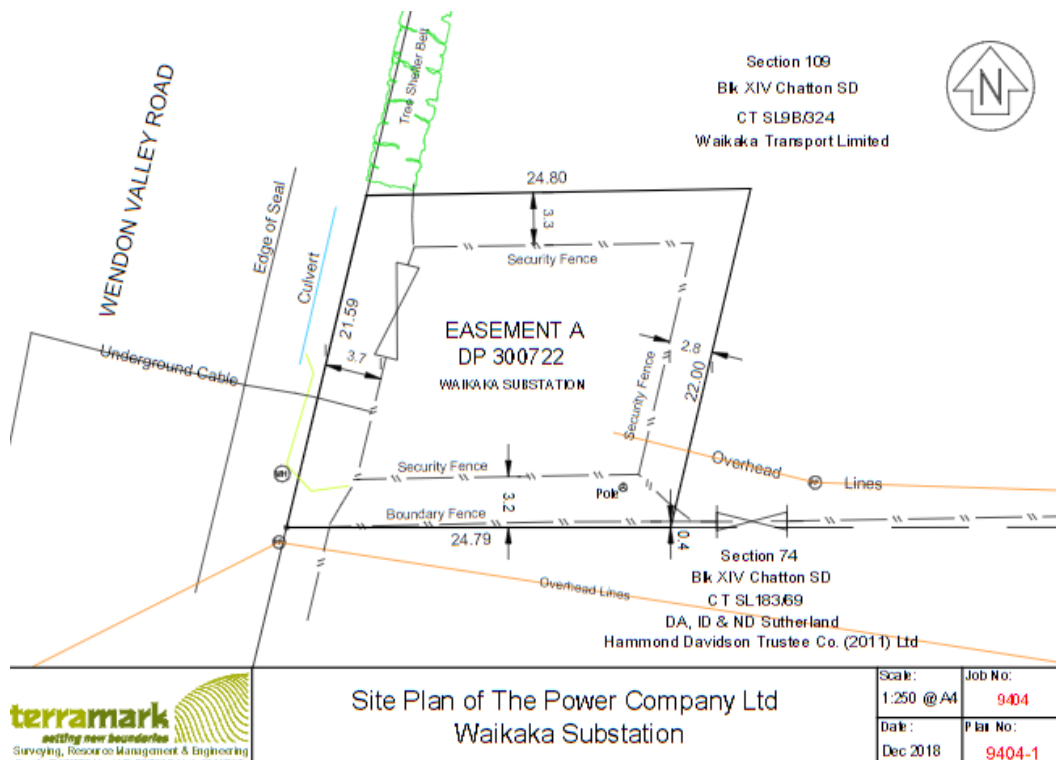


Figure 4: Map of Waikaka Designation