

Further Submission by Transpower New Zealand Limited

- Proposed Waimakariri District Plan
- Proposed Variation 1: Housing Intensification (Medium Density Residential Standards)

21 November 2022

Keeping the energy flowing



Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To Waimakariri District Council ("the Council")

Name of person making further submission: Transpower New Zealand Limited ("Transpower")

This is a further submission in support of, and in opposition to, submissions on:

- **the proposed Waimakariri District Plan ("Proposed District Plan"); and**
- **Variation 1: Housing Intensification (Medium Density Residential Standards) to the Proposed District Plan ("Proposed Variation").**

Transpower has an interest in the Proposed District Plan and Proposed Variation that is greater than the interest the general public has, for reasons including the following:

- Transpower is the owner and operator of the National Grid and the National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 ("NPSET") and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA"). The Proposed District Plan must give effect to the NPSET and must not duplicate or conflict with the regulations in the NESETA. Transpower has an interest in ensuring that the Proposed District Plan meets these statutory obligations.
- Transpower has an interest as a landowner and/or occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.
- Transpower made an original submission on matters raised or affected by other submissions.

Transpower's further submissions

- In respect of the Proposed District Plan, Transpower's support of, or opposition to, a particular submission including the reason for Transpower's support or opposition and the relief sought are detailed in the table attached as Appendix A. The general reasons for Transpower's further submission are set out below. These reasons apply to each submission listed in Appendix A and are supplemented by specific reasons and relief in Appendix A.
- In respect of the Proposed Variation, Transpower's support of, or opposition to, a particular submission including the reason for Transpower's support or opposition and the relief sought are detailed in the table attached as Appendix B. The general reasons for Transpower's further submission are set out below. These reasons apply to each submission listed in Appendix B and are supplemented by specific reasons and relief in Appendix B.

General reasons and decisions sought in respect of submissions supported by Transpower

For each of the submissions identified as being supported by Transpower, they are supported to the extent that they:

- give effect to the NPSET;

- give effect to relevant provisions of the Canterbury Regional Policy Statement 2013 (July 2021) (“CRPS”);
- are consistent with and/or promote the outcomes sought by the NESETA;
- are the most appropriate means of exercising the Council’s functions in respect of section 32 of the RMA;
- enable people and communities to provide for their social, economic and cultural well-being and for their health and safety.

Transpower seeks that the submissions it supports be allowed to the extent that they achieve the matters set out above or such further alternate relief or amendments as may be necessary to achieve those matters.

General reasons and decisions sought in respect of submissions opposed by Transpower

For each of the submissions identified as being opposed by Transpower, they are opposed to the extent that they failed to achieve the matters set out above.

Transpower seeks that the submissions it opposes be disallowed to the extent that they fail to achieve the matters set out above or such further alternative relief or amendments as may be necessary to achieve those matters.

Transpower wishes to be heard in support of its further submissions.

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

Environmental Regulatory Team Leader, Transpower

Signature of person authorised to sign

on behalf of Transpower New Zealand Limited

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Appendix A – Transpower New Zealand Limited: Further Submission on Submissions Made on the Proposed Waimakariri District Plan

The following table sets out the decisions sought by Transpower in respect of submissions made on the Proposed District Plan, including the reasons for Transpower’s support or opposition in respect of the original submission. The Proposed District Plan text is shown without underlining; the relief sought in primary submission is shown as black underlined and ~~striketrough~~; and the further amendments sought by Transpower are shown in red double underlined and ~~double-striketrough~~.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Fulton Hogan Limited (Submission reference 41)				
41.7	<p>Definitions</p> <p>Definition of ‘Indigenous Vegetation’</p> <p>Amend the definition of 'indigenous vegetation clearance' as follows:</p> <p><i>“means the felling, clearing removal, or damage or disturbance of indigenous vegetation by activities including cutting, mob stocking, crushing, cultivation, irrigation, earthworks, chemical application, artificial drainage, stop banking, or burning, or any other activity in or directly adjacent to an area of indigenous vegetation that destroys or directly results in extensive failure of an area of indigenous vegetation.”</i></p>	Support	Transpower supports the relief sought on the basis that the revised definition provides greater clarity through the deletion of ‘clearance’ and ‘disturbance’ from the definition.	Allow the submission.
Chorus New Zealand Limited (“Chorus”), Spark New Zealand Trading Limited (“Spark”) and Vodafone New Zealand Limited (“Vodafone”) (Submission reference 62)				
62.36 and 62.62 to 62.75	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Matters of Discretion EI-MD3</p> <p>Amend EI-R2, EI-R4, EI-R7, EI-R8, EI-R9, EI-R11, EI-R12, EI-R13, EI-R14, EI-R15, EI-R16, EI-R17, EI-R36, EI-R40 by including EI-MD3 as a matter of discretion where permitted activity standards are not met.</p>	Support	Transpower agrees with the submission and considers that operational considerations should similarly be a matter of discretion when for electricity transmission infrastructure and the matter of discretion should be applied to all rules that relate to electricity infrastructure in the same manner.	Allow the submission by including EI-MD3 to all relevant rules that relate to electricity transmission infrastructure.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
62.46	ECO - Punaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity Matters of Discretion ECO-MD1 Amend ECO-MD1 by adding a further clause: "... <u>x. In respect of infrastructure, the extent to which the proposed infrastructure has a functional need or operational need for its location, and whether alternative locations or layout/methodology would be suitable.</u> "	Support	Transpower agrees with the submission and considers that the functional need and operational need of infrastructure is a relevant consideration in respect of indigenous vegetation clearance.	Allow the submission.
Kyleston Farms Ltd (Submission reference 70)				
70.1	LLRZ - Large Lot Residential Zone Rezone 90 Dixons Road, Loburn as Large Lot Residential Zone.	Neutral	<p>Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid and the submission has not considered the implications of this.</p> <p>Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p> <p>Transpower seeks that any decision to rezone the site to a provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "<i>avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be</i> 	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<i>operated, maintained, upgraded and developed</i> "; and therefore - achieves the purpose of the RMA.	
Alan and Margaret Fraser (Submission reference 123), Alison and Peter Batchelor (Submission reference 135), Anton and Deana Musson (Submission reference 137), Ron and Tracey Taylor (Submission reference 138), Leanne and Paul Strathern (Submission reference 139), Dianne and Geoff Grundy (Submission reference 140), Graeme and Lynne Wellington (Submission reference 141)				
123.1, 135.1, 137.1, 138.1, 139.1, 140.1, 141.1	Planning Maps Rezone 21 Fawcetts Road (Lot 2 DP 75032), 49 Fawcetts Road (Lot 1 DP 75032), 63 Fawcetts Road (Lot 1 DP 29067), 65 Fawcetts Road (Lot 2 DP 29067), 75 Fawcetts Road (Lot 3 DP 29067), 87 Fawcetts Road (Lot 4 DP 29067), 9 Boundary Road (Lot 5 DP 29067), 17 Boundary Road (Lot 6 DP 29067), 25 Boundary Road (Lot 10 DP 29067) from Rural Lifestyle Zone to Large Lot Residential Zone.	Neutral	Transpower does not support or oppose the relief sought, and acknowledges that the submission addresses the potential impact of the rezoning sought on the National Grid. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by " <i>avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed</i> "; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. Transpower considers that, given the transmission lines traverse the corner of the site subject to the submission, one option to achieve this would be to retain the Rural Lifestyle Zone over the area that is subject to the National Grid Yard.	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.
Rolleston Industrial Developments Limited (Submission reference 160)				

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
160.1	General Rezone Ohoka properties legally described as Lot 2 & 3 DP 318615, Lot 2 & Part Lot 1 DP 8301, Lot 2 DP 61732, Lot 1 DP 55849, Lot 2 DP55404, Part RS 2220, Lot 1 DP 318615 and Part Lot 1 DP 2267 General Residential Zone with a portion subject to an Education/Retirement Village Overlay, Large Lot Residential Zone, Local Centre Zone, and Open Space Zone (as indicated in map in Annexure B of submission) as per the pending private plan change request for this land.	Neutral	Transpower is a submitter on Proposed Private Plan Change 31. Transpower's submission seeks a range of relief in order to: - establish a clear and appropriate expectation of future land use in the vicinity of the National Grid; - provide greater clarity for plan users; - give effect to Policies 1, 2, 10 and 11 of the NPSET; - give effect to the Policy 4 of the NPSUD; - give effect to Policy 16.3.4(2) of the CRPS; - retain the existing considerations and obligations in the NESETA Regulations; - meet the requirements of section 32 and 75 of the RMA; and therefore - achieve the purpose of the RMA. For these reasons, Transpower seeks the same relief in respect of the Proposed District Plan.	If the submission is allowed: - retain the Rural Zone over the area of land that is traversed by the National Grid, including an appropriate buffer; - require Transpower to be consulted as part of any application for subdivision consent for the site; - include explicit direction landscape treatments in the vicinity of the National Grid must be designed and implemented to achieve compliance with NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 (including when planting reaches maturity).
New Zealand Pork Industry Board ("NZ Pork") (Submission reference 169)				
169.9	Definitions Definition of 'sensitive activity' Opposes the definition of 'sensitive activity' because it does not cover other activities that are sensitive to the effects of primary production, and are permitted in rural zones. Seeks that the definition be amended to cover other activities such as conservation activities, recreation activities, rural tourism, equestrian and ancillary activities and facilities, and farmers market.	Oppose	While Transpower acknowledges that the term 'sensitive activity' is used across a range of provisions in the Proposed District Plan, Transpower is concerned that the amendments proposed in the submission would have consequences for the National Grid, and particularly the way in which Policy 11 of the NPSET is given effect to. That is, the suggested amendments are inappropriately broad and inconsistent with the definition in the NPSET.	Disallow the submission.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (Submission reference 192)				
192.28	SD - Rautaki ahunga - Strategic directions Introduction Seeks minor amendments to improve consistency between the Strategic Directions and Urban Form and	Support in part	Subject to Transpower's primary submission, Transpower supports the proposed amendment to reference Parts 2 and 3 of the Proposed District Plan. Transpower does not consider that the amendment to reference resource	Allow the submission in part, but amending the relief sought as follows:

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	Development Chapters, and clarify that there are more detailed provisions in other Part 2 and Part 3 chapters as follows: <i>"For the purpose of District Plan development, including plan changes <u>and resource consents</u>, the strategic objectives in this chapter provide direction for the more detailed provisions contained in other <u>Part 2 and Part 3</u> chapters of the District Plan. ..."</i>		consents is necessary because the direction in respect of resource consents is given in the subsequent sentence of the introductory text.	<i>"For the purpose of District Plan development, including plan changes <u>and resource consents</u>, the strategic objectives in this chapter provide direction for the more detailed provisions contained in other <u>Part 2 and Part 3</u> chapters of the District Plan. ..."</i>
192.31	SD - Rautaki ahunga - Strategic directions Objectives SD-O3 Amend SD-O3 as follows: "... 2. infrastructure, including strategic infrastructure, critical infrastructure and regionally significant infrastructure: a. is able to operate efficiently and effectively; <u>while</u> ii. <u>managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity;</u> and b. is enabled, while <u>the benefits of new infrastructure development are recognised:</u> i. managing adverse effects on the surrounding environment, having regard to the social, cultural and economic benefit, functional need and operational need of the infrastructure; and ii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity; ..."	Oppose	Transpower does not support the amendment sought to Objective SD-O3 on the basis that the amendment deletes reference to infrastructure being 'enabled' in a manner that is inconsistent with, and does not give effect to the Objective of the NPSET and Policy 16.3.4 of the CRPS (insofar as SD-O3 relates to the National Grid).	Disallow the submission.
192.33	UFD - Ahuatanga auaha a taone - Urban form and development Amend Urban Form and Development introductory text as follows: <i>"For the purpose of District Plan development, including plan changes and resource consents, the</i>	Support	Transpower generally supports the amendments proposed in the submission to the extent that the amendments provide clarity and better set out how the various provisions in the Proposed District Plan work together.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><u>strategic direction UDF objectives and policies in this chapter must be given effect to through provide direction for the more detailed provisions contained in other Part 2 and Part 3 chapters of the District Plan. For the purpose of District Plan implementation, including the determination of resource consent applications:</u></p> <p><u>1. the strategic UFD objectives and policies may provide guidance for related objectives and policies in other chapters; and</u></p> <p><u>2. the relevant objectives and policies of the District Plan, including strategic objectives in this chapter, are to be considered together and no hierarchy exists between them."</u></p>			
192.41	<p>ECO - Punaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity</p> <p>Amend ECO-O1 as follows:</p> <p>"Overall, there is an increase in the quality and extent of indigenous biodiversity throughout the District, comprising:</p> <ol style="list-style-type: none"> 1. protected and restored SNAs; and 2. other areas of indigenous vegetation and habitat of indigenous fauna that are maintained or and where practicable enhanced." 	Support	Transpower generally supports the amendments proposed to Objective ECO-O1 to the extent that the amendments better reflect the high order direction given in the CRPS and the RMA.	Allow the submission to the extent that it is consistent with high order provisions and the RMA.
192.56	<p>ECO - Punaha hauropi me te rerenga rauropi taketake - Ecosystems and indigenous biodiversity</p> <p>Matters of Discretion ECO-MD1</p> <p>Amongst other matters, amendment ECO-MD1 to include the following:</p> <p><u>"12. the purpose for clearance and the effects of use for that purpose on remaining and adjacent indigenous biodiversity.</u></p>	Support in part	Transpower supports the addition of further clauses in ECO-MD1 and particularly notes that having the ability to consider the purpose of clearance allows the benefits of the activity that gives rise to the clearance to be considered.	Allow the submission to the extent that the two new clauses are included in ECO-MD1.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<u>13. the extent to which clearance maintains indigenous biodiversity.”</u>			
192.69	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P4 Amend Policy NATC-P4, clause (2) because it is not clear what minimising means in this context. The Policy should be consistent with NATC-P5 and NATC-P6 which does not use 'minimise' but uses avoid, remedy or mitigate.	Support	Transpower generally supports the submission on the basis that the use of 'minimise' is unclear and similarly considers that 'avoid, remedy or mitigate' is more appropriate in the context of Policy NATC-P4. Limited amendments are sought to confirm that the Policy is intended to address the effects of vegetation clearance.	Allow the submission by amending Policy NATC-P4(2) as follows: “ Avoid minimising remedy or mitigate the effects of in that order , indigenous vegetation clearance and medication, including where associated with ground disturbance and the location of structures near wetlands, and lakes and rivers and their margins; ...”
Waimakariri Irrigation Limited (“WIL”) (Submission reference 210)				
210.6	NH - Matepa mahorahora - Natural hazards Policies NH-P12 Considers it inappropriate that the policy requires that there are no practical alternatives, particularly in the case of existing below ground infrastructure. It would be inappropriate to have to prove that there are no practical alternatives to upgrades whenever undertaking those works. Seeks that Policy NH-P12(3) is amended to delete the requirement that there be no practical alternatives.	Support	Transpower supports the deletion of reference to 'no practical alternatives' and agrees with the submission that the Policy, as notified, could direct unusual and inefficient outcomes that are nevertheless 'practical alternatives'.	Allow the submission and amend Policy NH-P12 as follows: “3. there is a functional need or operational need for the infrastructure to be located in a high flood hazard or high coastal flood hazard area and there are no practical alternatives ; and ...”
210.15	SASM - Nga whenua tapu o nga iwi - Sites and areas of significance to Maori Matters of Discretion SASM-MD1 Seeks that SASM-MD1 is amended to replace “suitable” with “practicable”.	Support	Transpower supports the amendment proposed on the basis that the language is better understood and therefore, the amendment provides greater clarity to plan users.	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
210.16	SASM - Nga whenua tapu o nga iwi - Sites and areas of significance to Maori Matters of Discretion SASM-MD2 Seeks that SASM-MD2 is amended to replace "suitable" with "practicable".	Support	Transpower supports the amendment proposed on the basis that the language is better understood and therefore, the amendment provides greater clarity to plan users.	Allow the submission.
210.17	SASM - Nga whenua tapu o nga iwi - Sites and areas of significance to Maori Matters of Discretion SASM-MD3 Seeks that SASM-MD3 is amended to replace "suitable" with "practicable".	Support	Transpower supports the amendment proposed on the basis that the language is better understood and therefore, the amendment provides greater clarity to plan users.	Allow the submission.
210.28	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P2 Amend Policy NATC-P2 to include the following <i>"5. the absence of critical or regionally significant infrastructure."</i>	Support	Transpower supports the relief sought on to the extent that the presence of infrastructure is likely to diminish the natural character values of a water body.	Allow the submission.
210.29	NATC - Ahuatanga o te awa - Natural character of freshwater bodies Policies NATC-P3 Amend NATC-P3 as follows: <i>"Recognise the cultural significance of wetlands, lakes and rivers and their margins, to mana whenua, and manage the effects of land use activities through limiting the size, visual appearance, and location, to ensure they do not adversely affect taonga species, mahinga kai or customary harvesting, access, and other cultural values."</i>	Support	Transpower supports the submission because alternative methods are also relevant, particularly in respect of the National Grid and the direction given by Policy 4 of the NPSET. Further, it is noted that operational requirements may mean that limiting size, appearance and location cannot be achieved.	Allow the submission.
CSI Property Limited (Submission reference 212)				
212.1	Planning Maps – General Oppose Rural Lifestyle zoning for 149, 197, 243 and 287 Boys Road, 4,137, 150 and 228 Marsh Road, 2, 10,	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	24, 28, 32 and 34 Dunlops Road, 17 and 21 Gefkins Road, 109 Camside Road, and part of 65 Northbrook Road. Seek rezoning to General Residential Zone, with some commercial zoning as required to service that area."		<p>the National Grid and the submission has not considered the implications of this.</p> <p>Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p> <p>Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed", - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.
212.3	Planning Maps- General Rezone 301 Bradleys Road and rezone to General Residential Zone and Large Lot Residential Zone, with commercial zoning as required to service that area.	Neutral	<p>Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid and the submission has not considered the implications of this.</p> <p>Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p>	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p>Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	
Concept Services (Submission reference 230)				
230.7	<p>SUB - Wawahia whenua – Subdivision Policies SUB-P1</p> <p>The term 'avoid' is restrictive and unnecessary when a proposed subdivision would likely require consultation with Transpower, and a solution could be found where subdivision is appropriate.</p> <p>The term 'avoid' often implies an activity has an activity status of non-complying or prohibited, however SUB-R6 provides for subdivision within the National Grid Yard as restricted discretionary activity. Amending SUB-P1 would make it is more consistent with SUB-R6. Amend SUB-P1(3) as follows:</p> <p><i><u>"Avoids-Manages subdivision that has the potential to restrict the operation ... of the National Grid."</u></i></p>	Oppose	<p>Transpower does not support the relief sought on the basis that the amendments proposed do not give effect to the NPSET and Policy 16.3.4 of the CRPS.</p>	Disallow the submission.
Rick Allaway and Lionel Larsen (Submission reference 236)				
236.1	Planning Maps - General	Neutral	<p>Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by</p>	If the submission is allowed, ensure that the site can be

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Rezone 181, 201, 255, 257, 259, 261, 263, 265, 267, 271, 285, 305, 311, and 315 Lehman's Rd, Fernside from Rural Lifestyle Zone (RLZ) to Large Lot Residential Zone (LLRZ) with net site area density partly 1000m ² minimum with 1500m ² minimum average and partly 2500m ² minimum with 5000m ² minimum average, along with some higher density residential development. Or amend planning map to enable the submitter's alternative request to rezone the site Low Density Residential Zone; or General Residential Zone (GRZ); or LLRZ (either LLRZ density standards; or net site area density partly 1000m ² minimum with 1500m ² minimum average and partly 2500m ² minimum with 5000m ² minimum average), Low Density Residential Zone (1000m ² minimum and 1500m ² minimum average), or GRZ, along with some higher density residential development.		<p>the National Grid and the submission has not considered the implications of this and instead has suggested that this can be parked for the ODP/subdivision stage. Transpower does not agree and notes that the decisions on the Proposed District Plan must give effect to the NPSET and CRPS.</p> <p>Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p> <p>Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "<i>avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed</i>"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid (in turn, giving effect to the NPSET and CRPS).
Carter Group Property Limited (Submission reference 237)				
237.1	<p>Planning Maps -General</p> <p>Rezone Lot 2 & 3 DP 318615, Lot 2 & Part Lot 1 DP 8301, Lot 2 DP 61732, Lot 1 DP 55849, Lot 2 DP55404, Part RS 2220, Lot 1 DP 318615 and Part Lot 1 DP 2267 a combination of General Residential Zone (including</p>	Neutral	<p>Transpower is a submitter on Proposed Private Plan Change 31 that seeks a similar outcome for this site. Transpower's submission seeks a range of relief in order to:</p> <ul style="list-style-type: none"> - establish a clear and appropriate expectation of future land use in the vicinity of the National Grid; 	<p>If the submission is allowed:</p> <ul style="list-style-type: none"> - retain the Rural Zone over the area of land that is traversed by the National Grid, including an appropriate buffer;

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	an overlay providing for Educational facilities and retirement village activities), Large Lot Residential Zone, Local Centre Zone, and Open Space Zone.		<ul style="list-style-type: none"> - provide greater clarity for plan users; - give effect to Policies 1, 2, 10 and 11 of the NPSET; - give effect to the Policy 4 of the NPSUD; - give effect to Policy 16.3.4(2) of the CRPS; - retain the existing considerations and obligations in the NESETA Regulations; - meet the requirements of section 32 and 75 of the RMA; and therefore - achieve the purpose of the RMA. <p>For these reasons, Transpower seeks the same relief in respect of the Proposed District Plan.</p>	<ul style="list-style-type: none"> - require Transpower to be consulted as part of any application for subdivision consent for the site; - include explicit direction landscape treatments in the vicinity of the National Grid must be designed and implemented to achieve compliance with NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 (including when planting reaches maturity).
David Cowley (Submission reference 244)				
244.1	<p>Planning Maps - General</p> <p>Rezone the land outlined in red on Figure 1 which is 405 Bradleys Road, 547 Mill Road, 351 Bradleys Road, and 566 Mill Road (approximately 51ha) and any other neighbouring land as appropriate (including as outlined blue on Figure 1) from Rural Lifestyle Zone to Large Lot Residential Zone (LLRZ), with minimum lot size of 2,500m² and average lot size not less than 5000m².</p> <p>Alternatively, rezone to LLRZ, with minimum lot size 1000m² and average lot size not less than 2000m²; or a mix of the above zones, as appropriate."</p>	Neutral	<p>Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid and the submission has not considered the implications of this.</p> <p>Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations, including the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p> <p>Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan that enable and protect the National Grid (as amended by Transpower's submission); - gives effect to Policies 10 and 11 of the NPSET; - gives effect to Policy 16.3.4 of the CRPS by "<i>avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit</i> 	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p><i>the ability of the electricity transmission network to be operated, maintained, upgraded and developed</i>";</p> <ul style="list-style-type: none"> - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	
MainPower New Zealand Limited (Submission reference 249)				
249.98	<p>EI - Pungao me te hanganga hapori Energy and infrastructure</p> <p>Matters of Discretion EI-MD3</p> <p>Amend EI-MD3 as follows:</p> <p>" ...</p> <p><i>2. The extent to which placing infrastructure underground is unreasonable possible in terms of technical constraints, additional costs or environmental effects. ..."</i></p>	Oppose	<p>Transpower does not support the amendment proposed the EI-MD3 on the basis that assessing whether something is "possible" does not allow a judgement to be made about whether the 'possible' solution is an appropriate outcome. Transpower considers that a test of 'reasonableness' better allows the outcomes to be evaluated.</p>	Disallow the submission.
249.197	<p>SD - Rautaki ahunga - Strategic directions</p> <p>Introduction</p> <p>Seek changes to clarify the relationship between the Strategic Directions Chapter and other chapters in the Proposed District Plan as follows:</p> <p><i>"1. the SD may provides guidance for related objectives and policies in other chapters; and</i></p> <p><i>2. the relevant objectives and policies of the DP, including SD in this chapter, are to be considered together, with the SD having primacy over other objectives and policies of the District Plan. and no hierarchy exists between them."</i></p>	Oppose	<p>Transpower considers that the proposed amendments to clause (2) could have significant implications to the way in which the policy framework is understood. The submission suggests that the SD Chapter should have primacy, but does not consider whether the provisions have been developed (including through the section 32 of the RMA evaluation) with the hierarchy suggested.</p>	Disallow the submission.
Christchurch International Airport Limited (Submission reference 254)				
254.43	<p>SUB - Wawahia whenua – Subdivision</p> <p>Objectives SUB-O1</p> <p>Amend Objective SUB-O1 as follows:</p>	Support	<p>Transpower supports the relief sought in the submission and considers that, insofar as the relief relates to the National Grid, the amendments proposed give effect to the NPSET and Policy 16.3.4 of the CRPS.</p>	Allow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><i>"Subdivision design achieves an integrated pattern of land use, development, and urban form that:</i></p> <p>...</p> <p><i>3. supports protection of cultural and heritage values, conservation values; and</i></p> <p><i>4. supports community resilience to climate change and risk from natural hazards.; <u>and</u></i></p> <p><i><u>5. does not give rise to adverse effects on strategic infrastructure."</u></i></p>			
Waka Kotahi NZ Transport Agency (Submission reference 275)				
275.42	<p>EW - Ketuketu w henua – Earthworks</p> <p>Matters of Discretion EW-MD1</p> <p>Amend EW-MD1(12) as follows:</p> <p><i>"12. Any effects on the operation, maintenance, upgrade and development of the National Grid<u>critical infrastructure</u>;"</i></p>	Neutral	Transpower does not support or oppose the relief sought on the basis that the amendment proposed does not alter the 'matter' in respect of the National Grid.	Allow the submission.
275.43	<p>EW - Ketuketu whenua – Earthworks</p> <p>Matters of Discretion EW-MD8</p> <p>Amend EW-MD8 as follows:</p> <p>"</p> <p><i>g. any effects on the stability and life-supporting capacity of soil- <u>and</u></i></p> <p><i><u>h. any functional needs and operational needs of critical infrastructure."</u></i></p>	Support	Transpower supports the submission on the basis that there are situations where undertaking earthworks in or on an ONL or ONF is necessary in respect of the operational needs or functional needs of critical infrastructure (for instance, to maintain tower foundations or conductor clearances).	Allow the submission.
Doncaster Developments Limited (Submission reference 290)				
290.1	<p>Planning Maps - General</p> <p>Rezone 11.6ha at the northern end of Lehman's Road, Rangiora from Large Lot Residential Zone to General Residential Zone.</p>	Neutral	<p>Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid.</p> <p>While the submission acknowledges the presence of the transmission lines, Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land</p>	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p>uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations In the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p> <p>Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan, including as qualifying matters in the IPI, that enable and protect the National Grid (as amended by Transpower's submissions on the Proposed District Plan and the Proposed Variation); - gives effect to Policies 10 and 11 of the NPSET. Examples of the relevant National Grid provisions; - gives effect to Policy 16.3.4 of the CRPS by <i>"avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed"</i>; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	National Grid Yard and does not compromise the National Grid.
Horticulture New Zealand ("Hort NZ") (Submission reference 295)				
295.77	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Activity Rules - General (applicable to all energy and infrastructure) EI-R13</p> <p>Amend EI-R13 as follows:</p> <p><i>"Where:</i></p> <p>...</p> <p><u>3. there are no increased compliance requirements with NZECP34.2001 for landowners."</u></p>	Oppose	<p>Transpower does not support the relief sought because it is not clear how the addition of a tower or pole would place any obligation on a landowner in respect of NZECP34:2001. That is, if an infrastructure provider were to add a tower or pole the obligation to comply with NZECP34:2001 is with the infrastructure provider. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.</p>	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
295.78	<p>El - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Activity Rules - General (applicable to all energy and infrastructure) EI-R16</p> <p>Amend EI-R16 by adding the following additional clause:</p> <p><i><u>"7. there are no increased compliance requirements with NZECP34:2001 for landowners."</u></i></p>	Oppose	Transpower does not support the relief sought because it is not clear how an increase in voltage would place any obligation on a landowner in respect of NZECP34:2001. That is, if an infrastructure provider were to increase voltage of a line, the obligation to comply with NZECP34:2001 is with the infrastructure provider. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	Disallow the submission.
295.82	<p>El - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Matters of Discretion EI-MD6</p> <p>Amend EI-MD6(2) as follows:</p> <p><i><u>"2. Extent of compliance with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Including increased compliance requirements for landowners and occupiers."</u></i></p>	Oppose	Transpower does not support the relief sought because it is not clear how any activity would place any obligation on a landowner in respect of NZECP34:2001.	Disallow the submission.
295.83	<p>El - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Matters of Discretion EI-MD14</p> <p>Amend EI-MD14 as follows:</p> <p><i><u>"The extent of compliance, including increased compliance requirements for landowners and occupiers, with the relevant standard(s), and the extent of any effects of non-compliance with the relevant standard(s) including cumulative effects."</u></i></p>	Oppose	Transpower does not support the relief sought because it is not clear how any activity would place any obligation on a landowner in respect of NZECP34:2001.	Disallow the submission.
Malcolm Taylor (Submission reference 296)				
296.1	<p>Planning Maps – General</p> <p>Rezone the site at 1136-1160 Tram Road, 121-143 Wards Road and 490-494 No 10 Road from Rural Lifestyle Zone to Large Lot Residential Zone, to allow for allotment sizes in line with zoning of</p>	Neutral	<p>Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid.</p> <p>Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to</p>	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	adjoining areas to the south and east around Mandeville.		<p>develop the site given District Plan rules and other regulations in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act.</p> <p>Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that:</p> <ul style="list-style-type: none"> - is cognisant of the provisions in the proposed District Plan, including as qualifying matters in the IPI, that enable and protect the National Grid (as amended by Transpower's submissions on the Proposed District Plan and the Proposed Variation); - gives effect to Policies 10 and 11 of the NPSET. Examples of the relevant National Grid provisions; - gives effect to Policy 16.3.4 of the CRPS by "<i>avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed</i>"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	National Grid Yard and does not compromise the National Grid.
Kāinga Ora – Homes and Communities ("Kāinga Ora") (Submission reference 325)				
325.1	<p>SD - Rautaki ahunga - Strategic directions</p> <p>Introduction</p> <p>Seek changes to clarify the relationship between the Strategic Directions Chapter and other chapters in the Proposed District Plan as follows:</p> <p><i>"1. the SD may provides guidance for related objectives and policies in other chapters; and</i></p> <p><i>2. the relevant objectives and policies of the DP, including SD in this chapter, are to be considered together, with the SD having primacy over other</i></p>	Oppose	<p>Transpower considers that the proposed amendments to clause (2) could have significant implications to the way in which the policy framework is understood. The submission suggests that the SD Chapter should have primacy, but does not consider whether the provisions have been developed (including through the section 32 of the RMA evaluation) with the hierarchy suggested.</p>	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	objectives and policies of the District Plan and no hierarchy exists between them.			
325.154	SUB - Wawahia whenua – Subdivision Policies SUB-P1 "Amend SUB-P1(3) as follows: "Enable subdivision that: ... 3. manage avoids subdivision that restricts or <u>compromises</u> the operation, maintenance, upgrading and development of the National Grid;"	Oppose	Transpower does not support the replacement of "avoids" with "manages" in SUB-P1(3) because the amendment proposed does not give effect to the strong direction in the NPSET and Policy 16.3.4 with the later referring to "avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed" [emphasis added].	Disallow the submission
325.188	SUB - Wawahia whenua – Subdivision Matters of Control and Discretion SUB-MCD11 Amend SUB-MCD11 to only give effect to the provisions set out in the National Policy Statement on Electricity Transmission.	Oppose	Transpower does not support the relief sought on the basis that the submission does not explain how the amendments proposed confine SUB-MCD11 to matters relevant to the NPSET. Further, the submission does not consider the relevance of the CRPS (and Policy 16.3.4).	Disallow the submission
Lachlan James and Gloria Grace MacKintosh (Submission reference 380)				
380.1	Planning Maps General Seek Large Lot Residential Zone Overlay to apply to 194 Cones Road, Ashley.	Neutral	Transpower does not support or oppose the relief sought, however, it is noted that the subject land is traversed by the National Grid. Transpower is concerned that rezoning land in the vicinity of the National Grid for residential land uses may give rise to a misleading expectation in respect of the ability to develop the site given District Plan rules and other regulations In the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) and the Public Works Act. Transpower seeks that any decision to rezone the site to provide for residential uses be made in a manner that: - is cognisant of the provisions in the proposed District Plan, including as qualifying matters in the IPI, that enable and protect the National Grid (as amended by	If the submission is allowed, ensure that the site can be subdivided and developed in a manner that complies with the relevant rules and therefore avoids sensitive activities in the National Grid Yard and does not compromise the National Grid.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p>Transpower's submissions on the Proposed District Plan and the Proposed Variation);</p> <ul style="list-style-type: none"> - gives effect to Policies 10 and 11 of the NPSET. Examples of the relevant National Grid provisions; - gives effect to Policy 16.3.4 of the CRPS by "<i>avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed</i>"; - is consistent with Proposed District Plan provisions, including Objective SD-O3; and therefore - achieves the purpose of the RMA. 	
Federated Farmers of New Zealand Inc. (Submission reference 414)				
414.9	<p>Definitions</p> <p>Definition of National Grid Yard</p> <p>Amend the definition of 'National Grid Yard' to be consistent with NZECP34 Code of Practice for Electrical Safe Distances, particularly Section 2.4.1 around support structures. This definition and the yard widths are not consistent and unnecessarily onerous compared to the Code. Note that farmers will be overwhelmingly affected by regulation that exceeds the Code.</p>	Oppose	<p>Transpower opposes the relief sought. The purpose of the National Grid Yard is to give effect to the NPSET, as opposed to implementing NZECP34:2001. The National Grid Yard is measured from the centre line of a transmission line and the foundation of structures and is based on the position of conductors in everyday wind conditions.</p> <p>The identification of such a 'buffer' is a requirement of Policy 11 of the NPSET and is identified as a 'method' in respect of Policy 16.3.4 of the CRPS.</p> <p>Further, it is not clear how farmers will be affected, given that the extent of regulation is less than is currently included in the Operative District Plan.</p> <p>As a final matter, it is noted that the definition of 'National Grid Yard' is part of Transpower's nationally consistent approach to giving effect to the NPSET. In other jurisdictions the submitter has not opposed this approach. Transpower considers it would be useful to understand how Waimakariri District is distinguished from other (and neighbouring) jurisdictions.</p>	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
414.58 to 414.66	UFD - Ahuatanga auaha a taone - Urban form and development Amend Policies UFD-P1 to UFD-P10 by inserting the following additional clause 3: <i>"3. <u>Avoid where practicable any development on LUC 1-3 soils.</u>"</i>	Oppose	Transpower considers that the avoidance of any development on highly productive land goes beyond the direction given in the National Policy Statement for Highly Productive Land 2022. Transpower also notes that development on highly productive land does not always result in the loss of the ability to use that land for production. For these reasons, Transpower does not support the inclusion of an additional clause in the UFD Policies.	Disallow the submission.
414.68	EI - Pungao me te hanganga hapori - Energy and infrastructure Objectives EI-O3 Amend Objective EI-O3 as follows: <i>"Effects of other activities and development on energy and infrastructure: The safe, efficient and effective operation, maintenance, repair, renewal, upgrading and development of energy and infrastructure is not inappropriately constrained or compromised by activities and development, including by reverse sensitivity effects."</i>	Oppose	Transpower does not support the relief sought because, insofar as the Policy relates to the National Grid: - referring to the development and upgrading of the National Grid is consistent with the NPSET and Policy 16.3.4 of the CRPS; and - it is unclear how the Policy would compromise the Public Works Act processes.	Disallow the submission.
414.71	EI - Pungao me te hanganga hapori - Energy and infrastructure Policies EI-P6 Oppose as EI-P6 introduce additional stringency without justification where it goes beyond the constraints on surrounding land use in electricity transmission corridors provided in the NPSET. EI-P6 also introduces a term 'intensive farming activities' which is not defined in the plan. The requirement of the NPSET is only for activities to be reasonably managed to avoid reverse sensitivity effects on the electricity transmission network. The remaining policies cover the ground well, and the rules give	Oppose	Subject to the relief sought in Transpower's primary submission, Transpower opposes the relief sought and notes that the NPSET manages direct effects on the National Grid (particularly through Policy 10), as well as directing the regulation of sensitive activities in the vicinity of the National Grid.	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	effect to the NZ Electrical Code of Practice and are anticipated by the NPS-ET. EI-P5 manages the adverse effects of energy and infrastructure, and additional effects requiring management are beyond adverse effects has not been explained.			
414.73	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Activity Rules - General (applicable to all energy and infrastructure) Rule EI-R12</p> <p>Additions to poles or towers are often for an increase in line capacity or voltage which results in an increase in the corridor width adjacent to the line (under the NZECP34:2001). Whilst the width is limited in this instance to twice the width of the cross-arm (and no increase in height), there is no limitation on the number of times that this upgrade can occur thus, a stealth increase in corridor width could gradually occur without any landholder permission. Amend EI-R12 by limiting it to one event only as follows:</p> <p><u>"This rule can only be used once per pole on any given transmission line. Further upgrades require consent."</u></p>	Oppose	Transpower does not support the relief sought on the basis that the submission does not identify an adverse effect on the environment that is managed by the proposed clause. Where any electricity line is upgraded, the obligation is on the line owner/operator to maintain compliance with NZECP34. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	Disallow the submission.
414.74	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Activity Rules - General (applicable to all energy and infrastructure) EI-R13</p> <p>Additions to poles or towers are often for an increase in line capacity or voltage which results in an increase in the corridor width adjacent to the line (under the NZECP34:2001). Whilst the width is limited in this instance to twice the width of the cross-arm (and no increase in height), there is no limitation on the number of times that this upgrade can occur thus, a stealth increase in corridor width could gradually</p>	Oppose	Transpower does not support the relief sought on the basis that the submission does not identify an adverse effect on the environment that is managed by the proposed clause. Where any electricity line is upgraded, the obligation is on the line owner/operator to maintain compliance with NZECP34. If the submission is concerned with impacts on the ability to use a property in the future, this is addressed as a compensation and property related matter.	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	occur without any landholder permission. Amend EI-R13 by limiting it to one event only as follows: <i>"This rule can only be used once per pole on any given transmission line. Further upgrades require consent."</i>			
414.75	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure</p> <p>Activity Rules - General (applicable to all energy and infrastructure) EI-R16</p> <p>Oppose EI-R16 as this permitted activity rule allows for a doubling of the number of lines, and other substantial upgrades without landholder consultation. The plan fails to anticipate the effects that this will have on the transmission corridor. This is an ever increasing envelope, unsuited to a permitted activity rule which requires clearly defined effects. There is no limitation on the number of times that a line upgrade can be carried out. Amend EI-R16 by deleting the permitted activity rule, and replacing with a restricted discretionary rule.</p>	Oppose	<p>Transpower does not support the relief sought because:</p> <ul style="list-style-type: none"> - the submission does not describe the adverse effect on the environment that may be caused by the permitted activity; - the relief would not give effect to the NPSET (including Policy 2 and Policy 5); - the relief would be inconsistent with approaches to upgrading the National Grid in neighbouring jurisdictions; - a blanket resource consent requirement is significantly more stringent than the NESETA; - the proposed relief is not the most efficient or effective way to achieve the Objectives and purpose of the RMA. 	Disallow the submission.
414.76, 414.77 and 414.90	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - Electricity transmission and electricity distribution</p> <p>Rule EI-R24 and EI-R25 and Matter of Discretion EI-MD14</p> <p>There is no requirement for landholder consultation, even when a consent is triggered.</p>	Oppose	<p>Transpower does not support the inclusion of provisions that direct consultation with land owners. The provisions that relate to notification best address this in the context of the RMA.</p> <p>Further, in the context of the National Grid, the way in which Transpower interacts with landowners is directed by the Electricity Act in the first instance.</p>	Disallow the submission.
414.80 and 414.81	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure Activity Rules - Managing effects of activities and development on the National Grid</p> <p>Rule EI-R51</p> <p>Rules for National Grid must be consistent with NZECP34 and the National Policy Statement for Electricity Transmission, and not undermine</p>	Oppose	<p>Transpower opposes the relief sought and comments as follows:</p> <ul style="list-style-type: none"> - the submission fails to identify how the Rule is inconsistent with the NPSET; - easements are property related matters and cannot be regulated through a District Plan policy in retrospect; 	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	landowners' rights awarded by their legal easement agreements and other legislation. The National Grid corridor is located over private land, mostly farms. Transpower should have easement agreements for all their assets to have a direct relationship with the landowner and rights and obligation protected. Furthermore, Transpower already have protection via the Code of Practice for Electrical Safety Distances, and a NPS, which creates a distinctly uneven advantage over landowners.		<ul style="list-style-type: none"> - the NPSET and CRPS must be given effect to in the District Plan; - NZECP34:2001 is a regulation that relates to safe approach distances only and therefore does not address all potential effects of, and on, the National Grid; - the relief sought is inconsistent with Transpower's nationally consistent approach to giving effect to the NPSET (including in neighbouring jurisdictions) – giving rise to cross boundary issues; and - Transpower considers it would be useful to understand how Waimakariri District is distinguished from other (and neighbouring) jurisdictions, given the submitters position in these jurisdictions. 	
414.88	<p>EI - Pungao me te hanganga hapori - Energy and infrastructure Matters of Discretion</p> <p>Matter of Discretion EI-MD12</p> <p>Amend EI-MD12 as follows:</p> <p><i>"1. The extent of any impacts on the operation, maintenance, upgrading and development of the National Grid.</i></p> <p><i>2. The risk to the structural integrity of any affected National Grid support structure(s).</i></p> <p><i>3. The extent of any impact on the ability of the National Grid owner (Transpower NZ Ltd) to access the National Grid.</i></p> <p><i>4. The risk of electrical hazards affecting public or individual safety, and the risk of property damage."</i></p>	Oppose	<p>Transpower does not support the relief sought because:</p> <ul style="list-style-type: none"> - referring to the development and upgrading of the National Grid is consistent with the NPSET and Policy 16.3.4 of the CRPS; and - achieving access to the National Grid in the context of District Plan provisions is necessary to give effect to Policies 2, 5 and 10 of the NPSET. 	Disallow the submission.
Director-General of Conservation Tumuaki Ahurei (Submission reference 419)				
419.32	<p>SD - Rautaki ahunga - Strategic directions</p> <p>Objectives SD-O3</p> <p>Amend Objective SD-O3 as follows:</p> <p><i>"a. is able to operate efficiently and effectively; and</i></p>	Oppose	Transpower does not support the inclusion of reference to avoiding the loss of extent of natural inland wetlands and the loss of river extent because the proposed amendment fails to include the exception for specified infrastructure	Disallow the submission.

Submission Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><i>b. is enabled, while:</i></p> <p><i>i. managing adverse effects on the surrounding environment <u>including avoiding the loss of extent of natural inland wetlands and the loss of river extent and values; and</u></i></p> <p><i>ii. having regard to the social, cultural and economic benefit, functional need and operational need of the infrastructure; and</i></p> <p><i>iii. managing the adverse effects of other activities on infrastructure, including managing reverse sensitivity;"</i></p>		included in the National Policy Statement on Freshwater 2020.	
419.109	<p>NATC - Ahuatanga o te awa - Natural character of freshwater bodies</p> <p>Policies NATC-P6</p> <p>Amend Policy NATC-P6 as follows:</p> <p><i>"New and existing structures within and over freshwater bodies</i></p> <p><i><u>The loss of the extent of natural inland wetlands on the loss of river extent and values is avoided, when providing for new structures, and upgrades to existing structures, on the surface of freshwater where: ..."</u></i></p>	Oppose	Transpower does not support the inclusion of reference to avoiding the loss of extent of natural inland wetlands and the loss of river extent because the proposed amendment fails to include the exception for specified infrastructure included in the National Policy Statement on Freshwater 2020.	Disallow the submission.