SUBMISSION ON THE PROPOSED WAIMAKARIRI DISTRICT PLAN

(Clause 6 First Schedule Resource Management Act 1991)

TO:	District Plan Submissions Waimakariri District Council Private Bag 1005 Rangiora 7440 *Submission lodged by email – developmentplanning@wmk.govt.nz*
SUBMISSION ON:	The proposed Waimakariri District Plan
SUBMISSION BY:	MainPower New Zealand Limited
TRADE COMPETITION STATEMENT:	MainPower New Zealand Limited could not gain an advantage in trade competition through this submission.
SUBMITTER ADDRESS:	MainPower New Zealand Limited PO Box 346 Rangiora 7440 Attention: Sarah Barnes *Please note the different address for service below.*

INTRODUCTION

1. These submissions are made by MainPower New Zealand Limited (MainPower).

2. MainPower makes submissions in support and in opposition to elements of the proposed Waimakariri District Plan (the District Plan).

STATEMENT OF INTEREST AND BACKGROUND

3. MainPower New Zealand Limited own and operate the electricity distribution network in the North Canterbury and Kaikoura regions. The network covers an area of some 11,180 square kilometres (covering the Waimakariri, Hurunui and Kaikoura districts) and supplies line services to approximately 40,000 customers.

4. The distribution network is used to convey electricity from the national grid (owned and operated by Transpower New Zealand Limited) to property boundaries, from which

electricity retailers provide electricity to individual properties. Their distribution assets include:

a. 66kV sub-transmission overhead lines and cables
b. 33kV sub-transmission overhead lines and cables
c. 22kV sub-transmission overhead lines and cables
d. 11kV sub-transmission overhead lines and cables
e. Substations/transformers/switching stations/kiosks
f. Electricity structures (poles/pylons, earth rods and associated buildings)
g. Access tracks

5. The electricity sub-transmission network is identified as critical infrastructure, regionally significant infrastructure and is an essential lifeline service. Its significance is recognised in various planning documents, including the Regional Policy Statement (2013).

SUBMISSION SUMMARY

6. MainPower's overarching goal through the District Plan process is the development of a District Plan which ensures it can build, operate, maintain and upgrade its critical network infrastructure in a safe, efficient and effective manner. MainPower wishes to assist in the facilitation of the transition to a decarbonized economy, and therefore, it is essential that it is able to build and maintain its network.

7. MainPower wishes to acknowledge the collaborative approach of the Council during the pre-notification consultation period. During that time, MainPower and Council officers were able to work together on issue identification and resolution. While it was not always possible to reach agreement on all matters, it allowed many areas of potential contention to be addressed and has, as a result, narrowed the scope of submissions that MainPower is making. That said, however, a number of provisions that MainPower understood were agreed with the Council during pre-notification consultation have not been carried over to the notified version of the District Plan.

8. MainPower's submissions are founded on a desire to protect its network and keep the community safe by simplifying rules and, where applicable, reducing reliance on resource consenting as a means of achieving environmental outcomes. MainPower seeks additions, amendments and deletions to various District Plan provisions to ensure the rules are effective, and provide greater clarity and certainty around the application and interpretation of the proposed provisions. The submissions, including the specific relief sought, are included in the tables attached as **Appendix One**.

9. MainPower is submitting on the Planning Maps and the following chapters of the District Plan:
   - Definitions
   - Designations
   - Earthworks
   - Ecosystems and indigenous biodiversity
   - Energy, infrastructure and transport
   - Historic heritage
   - Natural character of freshwater bodies
   - Natural hazards

- Noise
- Notable trees
- Sites and areas of significance to Māori
- Strategic directions
- Subdivision
- The following zone chapters in relation to inserting corridor protection provisions:
    - General residential zone
    - Large lot residential zone
    - General rural zone
    - Rural lifestyle zone
    - General industrial zone
    - Open space zone
    - Settlement zone
    - Sport and active recreation zone
    - Natural open space zone

10. While MainPower's submissions in **Appendix One** cover a broad range of topics, some key issues are highlighted below:

- <u>The Strategic Directions (SD) Chapter</u>
  MainPower is supportive of the SD Chapter, insofar as it relates to the electricity distribution network. It is considered, however, that amendments are required to recognise the issue of reverse sensitivity effects on MainPower's Significant Electricity Distribution Lines ('SEDL" as defined in the District Plan) and to properly recognise the significant role of important infrastructure in the district. MainPower's submission proposes an amendment to Strategic Objective SD-O3 to address this issue.

- <u>Significant Electricity Distribution Line Corridor Protection</u>
  In the notified Plan, rules relating to corridor protection are located within the Energy and Infrastructure Chapter. MainPower's strongly held view is that such rules should be located within the relevant zone chapters, as this will ensure they are accessible, recognisable and will reduce the likelihood of the provisions being missed when development proposals are considered. In essence, the corridor protection provisions manage the use, development and protection of resources in each relevant zone and apply directly to the land use activities that are regulated in the zone. The corridor protection provisions should not be considered as being any different from any other zone rule that impacts on building/structure form or location. In addition to this general point, a number of rule amendments are also proposed in MainPower's submission.

- <u>The Energy and Infrastructure (EI) Chapter</u>
  Amendments are proposed to improve rule clarity and interpretation, and to better reflect the manner in which rules address the various elements of the MainPower's network.

- <u>The relationship between the EI Chapter and other District Plan Chapters</u>
  MainPower holds a general concern that the Plan lacks clarity as to the rule relationships between the EI Chapter and other Chapters. To resolve this concern, MainPower's submission proposes that the Council insert cross-referencing and

notes into all relevant rules in the various district-wide chapters to confirm that, with regard to network utilities, the rules in the EI Chapter apply. Alternatively, to directly cross-reference to any rule requirements or rules which are outside of the EI Chapter, but which apply to network utilities. MainPower considers that all rules which apply to regulate the activities of network utility operators should be contained in the EI Chapter, or clearly signalled and explicitly cross-referenced if they are to be located in other parts of the plan.

RELIEF

11. MainPower seeks the following decision from the Council:
    a. grant the relief as set out above and in **Appendix One** below; and/or
    b. grant any other consequential or similar relief that is necessary to deal with MainPower's concerns and the issues raised in this submission.

HEARING

12. MainPower wishes to be heard in support of its submissions.

13. If others make a similar submission, MainPower will consider presenting a joint case with them at the hearing.

Submission signed for and on behalf of MainPower New Zealand Limited

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26 November 2021

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Attention: Melanie Foote

ATTACHMENTS:

Appendix One: Submissions on Plan Provisions

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 1 – Part 2 District Wide Matters – Coastal Environment

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant coastal environment provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the coastal environment chapter. This is to ensure that plan users can navigate to the relevant parts of the coastal environment chapter with ease. As currently structured network utility operators and other plan users are required to	**Insert** appropriate hyperlinks from the EI chapter to the relevant coastal environment rules contained in the coastal environment chapter.

General Submission	Submission	Relief Sought
	read the whole coastal hazard chapter to determine what rules are applicable or not.	

CE – Objectives	Submission	Relief Sought
CE-04 **Activities in the coastal environment**	MainPower **supports** the objective as it appropriately recognises that not all use and development compromises values in the coastal environment.	**Adopt** CE-O4 as notified.

CE – Policies	Submission	Relief Sought
CE-P2 **Preservation of natural character**	MainPower **supports** this policy. It is important to protect natural character in the coastal environment. However, MainPower seeks clarity as to what is meant by "areas adjoining the CMA" in clause 1. Does this refer to land covered by the Coastal Environment Overlay? And if not, what extent of land is intended to be covered by that phrase? The policy wording also go further than the wording provided for under the New Zealand	**Amend** CE-P2 to clarify the matters raised in this submission.

CE – Policies	Submission	Relief Sought
	Coastal Policy Statement by using the words 'avoid'.	
CE-P7 **Infrastructure in the coastal environment**	MainPower **supports** the policy as it appropriately recognises that infrastructure and other physical works occur in the coastal environment. However, MainPower seeks clarification about the final part of this policy, which as drafted does not allow for *any* adverse effects on coastal natural character areas. This does not appear to match with the hierarchy set out in Policy P2, which sets out areas in which all effects are to be avoided, and areas where significant adverse effects are to be avoided, and other adverse effects may be avoided, remedied or mitigated. It is possible that the continued operation, maintenance, upgrade or development of critical infrastructure in the coastal environment may necessitate some adverse effects in situations where those effects are less than minor, or where they do not occur in areas of outstanding natural character.	**Amend** CE-P7 to better align with the hierarchy set out in P2.

CE - Proposed Plan Reference	Submission	Relief Sought
CE-R3 **Any building or structure**	MainPower **supports** the rule as notified.	**Adopt** CE-R3 as notified.

CE – Matters of discretion	Submission	Relief Sought
CE-MD1 **Buildings and structures**	MainPower **supports** the matter of discretion however seeks to add an additional clause to recognise the functional or operational need of critical infrastructure to locate in the coastal environment.	Amend ECO-MD1 as follows: **Buildings and structures** 1. The extent of indigenous vegetation clearance. 2. Measures to minimise any adverse effects on sensitive habitats such as dunes, rivers, lakes or wetlands. 3. The extent to which the proposal will integrate into, and be sympathetic to the landscape, including the scale, form, design and finish (materials) proposed and mitigation measures such as planting. 4. Mitigation measures to minimise the tsunami risk to people and property. 5. The extent to which the proposal would compromise existing public access to the CMA. 6. The use of natural elements such as landforms and vegetation within the site to mitigate the visibility of the proposal. 7. Where Te Ngāi Tūāhuriri Rūnanga has been consulted, the outcome of that consultation, and how the development or activity responds to, or incorporates the outcome of that consultation. 8. <u>Where there is a functional or operational need to locate critical infrastructure, or carry out maintenance, repair and upgrade of existing critical infrastructure, within the coastal environment.</u>

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 1 – Part 1 Introduction and General Provisions - Definitions

Term	Submission	Relief Sought
Ancillary infrastructure equipment	MainPower **supports** the definition of 'ancillary infrastructure equipment' however seeks to include 'telemetry equipment' as part of the definition.	**Amend** the definition of 'ancillary infrastructure equipment' as follows: means equipment that must be installed with the main components of infrastructure to enable its operation, including (but not limited to): telemetry equipment, valves, fittings, meters, pipework, power distribution units, microwave units, DC and surge arrestors, cable trays, cables, mounts, fibre access terminals, ducting, cable loops, combiner/junction boxes, remote radio units, pole- or tower-mounted amplifiers, lightning surge units, filters, or similar types of equipment required to support its operation, but excluding antennas, self-contained power units or generators.
'Critical infrastructure', 'Regionally Significant Infrastructure',	MainPower **opposes** the use of the multiple terms used for infrastructure in the plan i.e. 'infrastructure', 'regionally significant infrastructure', 'critical infrastructure' and	**Replace** the terms Critical infrastructure', 'Regionally Significant Infrastructure', and 'Strategic Infrastructure' with a new defined term 'Important Infrastructure'. This will require consequential changes throughout the plan.

Term	Submission	Relief Sought
'Infrastructure' and 'Strategic Infrastructure'	strategic infrastructure'. MainPower prefers to rationalise the terms use and proposes that the term 'important infrastructure' be used in the Proposed Waimakariri District Plan. This rationalisation simplifies and streamlines the terminology for plan users.	
Insert a new definition: Important Infrastructure	MainPower proposes a **new** definition 'important infrastructure' to rationalise the terms 'critical infrastructure, 'regionally significant infrastructure' and 'strategic infrastructure'.	**Insert** the following new definition: Important Infrastructure Those necessary facilities, services, and installations which are critical or of significance to either New Zealand, Canterbury, or Waimakariri. This may include but are not limited to: a. Strategic transport network b. Christchurch International Airport c. Telecommunication networks d. National, regional and local electricity generation activities undertaken by a Electricity Operator as defined by the Electricity Act 1992 e. Electricity distribution networks f. Electricity transmission networks g. Public and community wastewater collection, treatment and disposal networks h. Public and community land drainage infrastructure i. Public and community stormwater infrastructure j. Public and community potable water and fire fighting supply systems k. Public and community-scale irrigation and stockwater infrastructure

Term	Submission	Relief Sought
		l. Gas storage and distribution infrastructure m. Bulk fuel supply infrastructure including terminals, and pipelines n. Ports including inland ports o. New Zealand Defence Force facilities p. Emergency Services facilities q. Public healthcare institutions
Insert a new definition: "Electricity Cabinets and Kiosks"	MainPower proposes a **new** definition of electricity cabinets and kiosks. This equipment is small-scale and is necessary to operate the distribution network. But it has several specific features (including the fact that the equipment is not always enclosed in a casing) which make a separate definition more appropriate than the proposed generic 'infrastructure cabinet' definition, which does not capture all relevant MainPower distribution assets.	**Insert** the following new definition: **Electricity Cabinets and Kiosks** In relation to electricity distribution, means equipment affixed to, or within, the ground that is necessary to operate part of a utility or infrastructure network, including any casing.
Electricity Distribution	MainPower supports this definition, however, seeks to amend the definition to provide further clarity.	**Amend** the definition of 'electricity distribution' as follows: means the conveyance of electricity via electricity distribution lines, cables, support structures ~~poles, pi-poles, towers~~, substations, transformers, switching stations, kiosks, cabinets, and ancillary buildings and structures, including communication equipment, by a network utility operator. This includes MainPower New Zealand Limited assets shown on the planning maps.
Electricity Distribution Line	MainPower supports this definition however seeks to add a further clause to provide clarity.	**Amend** the definition of 'Electricity Distribution Line' as follows:

Term	Submission	Relief Sought
		means the lines and associated support structures ~~poles, pi-poles and towers~~ utilised by a network utility operator to distribute electricity. This includes MainPower New Zealand's Limited assets shown on the planning maps.
High Flood Hazard Areas	MainPower supports the definition of 'high flood hazard as this replicates part of the definition provided in the Canterbury Regional Policy Statement.	**Adopt** the definition of high flood hazard as notified.
Height in relation to infrastructure	MainPower **supports** this definition.	**Adopt** the definition of 'height in relation to infrastructure' as notified.
Infrastructure Building	MainPower **supports** this definition.	**Adopt** the definition of 'infrastructure building' as notified.
Infrastructure Cabinet	MainPower seeks to **amend** the definition of 'infrastructure cabinet to exclude electricity cabinets and kiosks.	**Amend** the definition of Infrastructure cabinet as follows: means a casing around equipment that is necessary to operate part of infrastructure, but is not an infrastructure building, electricity cabinet or kiosk.
Non- critical infrastructure	MainPower **supports** the definition of 'non-critical infrastructure'.	**Adopt** the definition of 'non-critical infrastructure as notified.
Pi-pole	MainPower **supports** this definition.	**Adopt** the definition of 'pi-pole' as notified.
Poles	MainPower **supports** this definition.	**Adopt** the definition of 'poles' as notified.
Temporary Infrastructure	MainPower **supports** this definition.	**Adopt** the definition of 'temporary infrastructure' as notified.
Towers	MainPower **supports** this definition.	**Adopt** the definition of 'tower' as notified.

Term	Submission	Relief Sought
Upgrading	MainPower **supports** this definition in relation to the application to the Natural Hazards chapter but consider they may be scope for a wider application of the definition across the plan given the term is widely used in the EI chapter for example.	**Adopt** the definition of upgrading as notified.

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Note: Proposed additions are underlined and deletions strikethrough

Table 3 – Part 3 – Designations and Planning Maps

Reference	Submission	Relief Sought
MPNZ-4 **Kaiapoi Substation**	MainPower **supports** the inclusion of the Kaiapoi Substation designation in the proposed Plan, but **opposes** the spatial extent of the designation shown on the planning maps. MainPower lodged a notice for the existing Kaiapoi substation designation to be rolled over from the operative District Plan to the proposed Plan, without modification. The spatial extent of the designation in the operative Plan planning maps is shown in blue in Image 1 below. **Image 1 – Operative District Plan**	**Correct** the boundaries of the designation for the Kaiapoi substation to align with Image 1 provided.

Reference	Submission	Relief Sought
	The Council has incorrectly plotted the boundaries of the designation on the <u>proposed</u> Plan planning maps, as shown in blue in Image 2 below. This needs to be corrected. **Image 2 – Proposed District Plan**	

Reference	Submission	Relief Sought
MPNZ – 9 **Rangiora North Zone Substation**	MainPower **supports** the inclusion of the Rangiora North Zone Substation designation in the proposed Plan, but **opposes** the spatial extent of the designation boundaries shown on the planning maps, as they are incorrect. Image 3 below shows the boundaries of the designation as marked on the proposed Plan planning maps. The plan attached as Annexure 1 illustrates the correct boundaries. **Image 3 Proposed District Plan**	**Correct** the boundaries of the designation for the Rangiora North Zone Substation to align with the plan attached as Annexure 1.

Annexure 1 Rangiora North Substation Designation Plan

Appendix One – Submission Details

General Relief Sought
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Note: Proposed additions are **underlined** and deletions ~~**strikethrough**~~

Table 4 – Part 2 District Wide Matters – Earthworks

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant earthworks provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the earthworks chapter. This is to ensure that plan users can navigate to the relevant parts of the earthworks chapter with ease. As currently structured network utility operators and other plan users are required to read the whole earthworks chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to relevant earthworks rules contained in the earthworks chapter.

General Submission	Submission	Relief Sought
New Rule: **Exemption for works subject to a building consent**	MainPower proposes a **new rule** to allow for earthworks subject to a building consent within 2m of the outer wall of a building.	**Insert** a new Rule as follows: **EW-RX** **Earthworks subject to a Building Consent** **All Zones** **Activity status:** PER 1. Earthworks that are or will be subject to a building consent. **Where:** a. It occurs within 2m of the outer edge of the exterior wall of the building. **Activity status when compliance not achieved:** Refer to activity rules to determine activity status and matters of discretion.
New: Rule **Earthworks adjacent to a major electricity distribution line**	MainPower seeks to **insert** corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone.	**Insert** the following new rule: **Earthworks adjacent to a major electricity distribution line** **Activity Status: PER** Where: 1. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line

General Submission	Submission	Relief Sought
		2. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
		• earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from **Trees**) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances.

EW-Objective	Submission	Relief Sought
EW-O1 **Earthworks**	MainPower **supports** the objective as it recognises earthworks adjacent to electricity infrastructure is a risk to the safety of people and has the potential to undermine the stability of support structures.	**Retain** EW-O1 as notified.

EW – Policies	Submission	Relief Sought
EW-P1 **Enabling earthworks**	MainPower **supports** the policy as it recognises that earthworks adjacent to infrastructure has the potential to destabilise support structures and compromise operational function.	**Retain** EW-P1 as notified.
EW-P2 **Earthworks within Flood Assessment Overlays**	MainPower **supports** the policy but notes it does not provide for earthworks associated with the maintenance, repair or upgrade of existing infrastructure or the operational or functional need for new infrastructure.	**Amend** EW-P2 as follows: Allow earthworks within the Urban Flood Assessment Overlay and Non-Urban Flood Assessment Overlay where: 1. the earthworks do not increase the flooding risk to the site or neighbouring sites through the displacement of flood waters; 2. the earthworks associated with proposed subdivision, development or use do not increase the risk to life or property; and 3. the ability to convey flood waters is not impeded as a result of the earthworks. 4. <u>the earthworks are associated with development, maintenance, repair, upgrade of critical infrastructure and have an operational or functional need to locate within a Flood Assessment Overlay.</u>

<table>
<tr><th>EW – Proposed plan provisions</th><th>Submission</th><th>Relief Sought</th></tr>
<tr>
<td>EW-R8

Earthworks for underground infrastructure</td>
<td>MainPower supports this rule but seeks to amend the rule to include all permitted infrastructure in the EI chapter.

MainPower undertakes earthworks as a general function of their daily activities e.g., trenching of underground cables, installation of new or replacement of existing poles, access track formation and maintenance and installation or replacement of cabinets. The majority of those earthworks are undertaken within road corridors and such activities should be permitted without a consenting burden.</td>
<td>Amend Rule EW-R8 as follows:

<table>
<tr><td>EW-R8</td><td colspan="2">Earthworks for ~~underground~~ infrastructure

This rule does not apply to any treatment plants, pump stations, canals, infiltration basins, open raw water storage ponds/lakes and treated water reservoirs provided for under EW-R11.</td></tr>
<tr><td>All Zones</td><td>Activity status: PER

Where:

1. the activity is a permitted activity in the EI Chapter. ~~under EI-R10~~.</td><td>Activity status when compliance not achieved: RDIS

Matters of discretion are restricted to:

• EW-MD1 - Activity operation, scale, form and location
• EW-MD6 - Coastal environment and hazards
• EW-MD7 - Water bodies, vegetation and fauna

• TREE-MD1 - Pruning, root protection area, trunk and crown, removal
• TREE-MD2 - Extent of benefit or need for the activity or works
• EI-MD3 Operational considerations</td></tr>
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EW – Proposed plan provisions	Submission	Relief Sought
EI-R11 **Earthworks not subject to Rules EW-R1 to EW-R10**	MainPower **supports** EI-R11 on the basis that amended EW-R8 activities (as per relief sought above) are not required to comply with EW-S1 to s7.	**Retain** EW-R11 as notified.

Earthworks Standards	Submission	Relief Sought
EW-S1- EW-S7	MainPower **supports** EW-S1-EW-S7 on the basis that infrastructure will not be required to comply with EW-S1-S7.	**Retain** EW-S1-S7 as notified.

EW-Matters of Discretion	Submission	Relief Sought
EW-MD1 **Activity operation, scale, form and location**	MainPower **supports** EW-MD1 however seek to amend clause 12 to include reference to 'the electricity distribution network.	**Amend** EW-MD1 as follows: **Activity operation, scale, form and location** **EW-MD1** 1. Location, volume and area of earthworks. 2. The operational need or functional need for the earthworks in the location.

EW-Matters of Discretion	Submission	Relief Sought
		3. Any effects on the natural character and amenity values of the site and surrounding area. 4. Any effects on archaeological sites, heritage values or the heritage setting of the site or within the surrounding area. 5. Any disturbance of culturally significant sites and any proposed mitigation measures. 6. Any effects on the health and structural integrity of any notable tree and any effects on the values that have been identified for the notable tree. 7. Public health and safety including contingency provisions for emergency response. 8. Mitigation including fencing, planting and landscaping. 9. Effects on soil quality. 10. Final contour and ground level resulting from excavation or filling. 11. Vehicle movements associated with earthworks. 12. Any effects on the operation, maintenance, upgrade and development of the National Grid and the electricity distribution network. 13. Any constraint on the future development potential of the site or surrounding sites.
EW-MD6 **Natural hazards**	MainPower **supports** EW0MD6 as notified.	**Retain** EW-MD6 as notified.
EW-MD6	MainPower **supports** EW-MD6 but seeks to amend the assessment matter to include a	**Amend** EW-MD6 as follows:

EW-Matters of Discretion	Submission	Relief Sought
Coastal environment and hazards	clause recognising the operational and functional need of infrastructure.	**EW-MD6** **Coastal environment and hazards** 1. Any increase in sedimentation in the coastal environment. 2. The extent to which the proposal will maintain, preserve or enhance the natural character attributes of the coastal environment. 3. Any effects from the clearance of vegetation, or disturbance of habitat in the coastal environment. 4. Any effects on the nature, form and resilience of the sandy beach, dunes or rocky shoreline including the protection they provide from coastal inundation. 5. Any effects on the functioning of coastal processes. 6. Any positive or adverse effects on risk to life, property and the environment posed by coastal hazards. 7. The extent to which earthworks would remedy or mitigate coastal hazard or be compatible with existing coastal hazard mitigation works or structures. 8. The extent to which the earthworks will restrict or enable public access and enjoyment of the coastal environment. 9. The extent to which earthworks restrict public access to and along the CMA and water bodies with high values. 10. The extent to which the earthworks will be supervised by either a Chartered Professional Engineer with experience in coastal processes or a professional Engineering Geologist (IPENZ registered). 11. Any effects on culturally significant sites. 12. <u>The operational need or functional need for earthworks in the location.</u>

EW-Matters of Discretion	Submission	Relief Sought
EW-MD7 **Waterbodies, vegetation and fauna**	MainPower **supports** EW-MD7 but seeks to amend the assessment matter to include a clause recognising the operational and functional need of infrastructure.	**Amend** EW-MD6 as follows: **EW-MD7** **Water bodies, vegetation and fauna** 1. The extent to which the disturbance of the soil, including disturbance of contaminated land, adversely affects areas of significant indigenous vegetation and significant habitats of indigenous fauna. 2. Any removal of, or disturbance to, indigenous vegetation. 3. Any effects on the natural character and water quality of any water body. 4. The extent to which the earthworks will restrict public access and enjoyment of the margin of any water body. 5. The extent to which the habitat of trout, salmon, and indigenous aquatic species, may be adversely affected by any disturbance on the margin of the water body. 6. Fencing, planting and landscaping. 7. The extent to which the land use will adversely affect wahi taonga and mahinga kai. 8. For ngā wai, the matters specified in SASM-MD3 Nga Wai. 9. The operational need or functional need for earthworks in the location.
EW-MD8 **Outstanding natural features and landscapes**	MainPower **supports** EW-MD8 as notified.	**Retain** EW-MD8 as notified.

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Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 5 – Part 2 District Wide Matters – Ecosystems and indigenous biodiversity

ECO – General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant ecosystems and indigenous biodiversity provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the ecosystems and indigenous biodiversity chapter. This is to ensure that plan users can navigate to the relevant parts of the ecosystems and indigenous biodiversity chapter with ease. As currently structured network utility operators and other plan users are required to read the whole ecosystems and indigenous biodiversity chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to the relevant ecosystems and indigenous biodiversity rules.

ECO – Policies	Submission	Relief Sought
ECO – New Policy	MainPower seek to insert two new policies to support small scale indigenous vegetation clearance activities provided for in ECO-R1.	**Insert** two new policies into ECO-Policies as follows: **<u>ECO-Policy A</u>** <u>Provide for small scale, low impact indigenous vegetation clearance where it will enable the continued use and the maintenance of existing critical infrastructure.</u> **<u>ECO-Policy B</u>** <u>Recognise that locational, operational and technical requirements for new, or upgrades to, critical infrastructure operated by network utilities operators may necessitate the removal of indigenous vegetation and habitats of indigenous fauna within ECO overlay areas.</u>
ECO-P2 **Protection and restoration of SNAs**	MainPower **supports** ECO-P2 as notified.	**Adopt** ECO-P2 as notified.
ECO-P5 **Offsetting residual effects**	MainPower **supports** ECO-P5 as notified.	**Adopt** ECO-P5 as notified.
ECO-P7 **Indigenous biodiversity in the coastal environment**	MainPower **supports** the policy in principle but notes there is no acknowledgement of the need to maintain, repair or upgrade existing infrastructure our any operational or functional requirements for new infrastructure.	**Amend** ECO-P7 as follows: **Indigenous biodiversity in the coastal environment** 1. Avoid adverse effects of activities on: a. indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists;

ECO – Policies	Submission	Relief Sought
		b. taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened; c. indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare; d. habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare; e. areas containing nationally significant examples of indigenous community types; and f. areas set aside for full or partial protection of indigenous biological diversity under other legislation; and g. <u>Ensure the siting of new critical infrastructure protects the ecological and indigenous values within coastal areas, taking into account the functional and operational need for the siting of critical infrastructure while also recognising and providing for the maintenance, repair and upgrade of existing critical infrastructure.</u> 2. Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on: a. areas of predominantly indigenous vegetation in the coastal environment; b. habitats in the coastal environment that are important during the vulnerable life stages of indigenous species; c. indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, eelgrass and saltmarsh;

ECO – Policies	Submission	Relief Sought
		d. habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes; e. habitats, including areas and routes, important to migratory species; and f. ecological corridors, and areas important for linking or maintaining biological values identified under this policy. g. Ensure the siting of new infrastructure protects the ecological and indigenous values within coastal areas, taking into account the functional and operational need for the siting of infrastructure while also recognising and providing for the maintenance, repair and upgrade of existing infrastructure.

ECO - Proposed Plan Reference	Submission	Relief Sought
ECO-R1 **Indigenous vegetation clearance within any mapped SNA or unmapped SNA**	MainPower **supports** the rule in principle but has concerns regarding the references to unmapped SNA's. MainPower considers all SNA's should be appropriately mapped to provide certainty. In addition, there is no provision for the trimming / removal of indigenous vegetation as a permitted activity when required for the maintenance, repair, upgrade or operation of critical infrastructure which is otherwise provided for under the Electricity	**Amend** Rule ECO-R1 as follows: **Indigenous vegetation clearance within any mapped SNA ~~or unmapped SNA~~** **Activity status: PER** Where: 1. within any mapped SNA **~~or unmapped SNA~~**, the indigenous vegetation clearance is: a. required for maintenance, repair or replacement purposes and is: a. within an existing access track; or b. within 3m of an existing building; or

ECO - Proposed Plan Reference	Submission	Relief Sought
	(Hazards from Trees) Regulations. Within this context, it is also necessary that vegetation clearance adjacent to critical infrastructure needs to be increased to 3m (as opposed to 2m) to ensure adequate operational clearance.	c. within 2m of an existing fence, existing gate, existing fire pond, existing stock yard, existing trough, or existing water tank; d. within ~~2~~3m of existing critical infrastructure, regionally significant infrastructure, strategic infrastructure or lifeline utility. b. for the purpose of protecting, maintaining, restoring or accessing the SNA's ecological values where it involves: a. carrying out activities in accordance with a registered protective covenant under the Reserves Act 1977, Conservation Act 1987 or Queen Elizabeth the Second National Trust Act 1977; b. carrying out activities in accordance with a Reserve Management Plan approved under the Reserves Act 1977; c. carrying out activities by or on behalf of the Crown in accordance with a Conservation Management Plan prepared under the Conservation Act 1987; or d. erecting a fence; c. for biosecurity purposes and is undertaken by, or on behalf of, the District Council, the Regional Council or Crown, or their nominated agent; d. for the purpose of harvesting indigenous vegetation that was planted for the purpose of plantation forestry; e. for the purpose of customary harvesting; f. expressly authorised under the NESF; or

ECO - Proposed Plan Reference	Submission	Relief Sought
		g. for the purpose of forming a walking or cycling access track where: a. the track has a maximum width of 2m; and b. the area of indigenous vegetation clearance is a maximum of 1% of the total area of the SNA on that site, or a maximum of 50m2 from the SNA on that site, whichever is lesser; and c. does not involve the clearance of any tree with a trunk greater than 15cm in diameter when measured 1.4m above ground.
ECO-R2 **Indigenous vegetation clearance outside of any mapped SNA or unmapped SNA**	MainPower **supports** the rule in principle but has concerns around the uncertainty relating to unmapped SNA's and proposes references to unmapped areas be deleted. Clause 1 is a repetition of the rule title and is unnecessary. Furthermore, Clauses 3 and 8 are overly complex and can be simplified to enable the removal of indigenous vegetation as a permitted activity when associated with the maintenance, repair, upgrade or replacement of critical infrastructure.	**Adopt** Rule ECO-R2 as follows: **Indigenous vegetation clearance outside any mapped SNA ~~or unmapped SNA~~** **Activity status: PER** **Lower Plains Ecological District; High Plains Ecological District** Where: ~~1. the indigenous vegetation is not within any mapped SNA or unmapped SNA: and~~ 2. the indigenous vegetation clearance is not within 75m of a lake, 20m of the bank of a river, or 50m of any wetland, unless the clearance is expressly authorised under the NESF; and 3. the indigenous vegetation clearance is: a. required for maintenance, repair, upgrade or replacement purposes ~~and is~~ of critical infrastructure:

ECO - Proposed Plan Reference	Submission	Relief Sought
		~~i. within an existing access track; or~~ ~~ii. within 3m of an existing building; or~~ ~~iii. within 2m of an existing fence, existing gate, existing fire pond, existing stock yard, existing trough, or existing water tank;~~ b. for the purpose of protecting, maintaining, restoring, and accessing ecological values and involves: i. carrying out activities in accordance with a registered protective covenant under the Reserves Act 1977, Conservation Act 1987 or Queen Elizabeth the Second National Trust Act 1977; ii. carrying out activities in accordance with a Reserve Management Plan approved under the Reserves Act 1977; iii. carrying out activities by or on behalf of the Crown in accordance with a Conservation Management Plan prepared under the Conservation Act 1987; or iv. erecting a fence; c. is for the purpose of customary harvesting; d. for biosecurity purposes and is undertaken by, or on behalf of, the District Council, Regional Council or Crown, or their nominated agent; e. of indigenous vegetation which has been planted and/or is managed as part of a domestic garden or has been planted for amenity purposes or as a shelterbelt;

ECO - Proposed Plan Reference	Submission	Relief Sought
		f. for the maintenance, repair, or replacement of existing flood protection works administered by the Regional Council or District Council; g. for the purpose of harvesting indigenous vegetation that was planted for the purpose of plantation forestry; h. of the indigenous understorey to plantation forest, and is incidental to permitted or otherwise authorised plantation forest clearance; or i. required for the purpose of maintaining improved pasture. **Oxford Ecological District; Torlesse Ecological District; Ashley Ecological District Where:** 4. the indigenous vegetation is not within any mapped SNA ~~or unmapped SNA~~: and 5. the indigenous vegetation clearance is not within 75m of a lake, 20m of the bank of a river, or 50m of any wetland, unless the clearance is expressly authorised under the NESF; and 6. the indigenous vegetation clearance is not on land above 900m in altitude; and 7. the indigenous vegetation clearance of indigenous vegetation shall be a maximum of 100m^2 or 10% of the total area of the site, whichever is lesser, on any site in any continuous five year period and the indigenous vegetation does not comprise any species or habitats listed in ECO-SCHED3 that are naturally occurring; 8. the indigenous vegetation clearance is: a. required for maintenance, repair, upgrade or replacement purposes ~~which is~~ of critical infrastructure: ~~i. within an existing access track; or~~

ECO - Proposed Plan Reference	Submission	Relief Sought
		~~ii. within 3m of an existing building; or~~ ~~iii. within 2m of an existing fence, existing gate, existing fire pond, existing stock yard, existing trough, or existing water tank;~~ b. required for the purpose of maintaining improved pasture; or c. for the maintenance, repair, or replacement of existing flood protection works administered by the Regional Council or District Council; d. for the purpose of protecting, maintaining, restoring, or accessing ecological values and involves: i. carrying out activities in accordance with a registered protective covenant under the Reserves Act 1977, Conservation Act 1987 or Queen Elizabeth the Second National Trust Act 1977; ii. carrying out activities in accordance with a Reserve Management Plan approved under the Reserves Act 1977; iii. carrying out activities by or on behalf of the Crown in accordance with a Conservation Management Plan prepared under the Conservation Act 1987; or iv. erecting a fence; e. for the purpose of customary harvesting; f. for biosecurity purposes and is undertaken by, or on behalf of, the District Council, the Regional Council or Crown, or their nominated agent; g. of indigenous vegetation which has been planted and/or is managed as part of a domestic garden or has been planted for amenity purposes or as a shelterbelt; h. for the purpose of harvesting indigenous vegetation that was planted for the purpose of plantation forestry; or

ECO - Proposed Plan Reference	Submission	Relief Sought
		i. of the indigenous understorey to plantation forest, and is incidental to permitted or otherwise authorised plantation forest clearance.

ECO – Matters of discretion	Submission	Relief Sought
ECO-MD1 Indigenous vegetation clearance	MainPower **supports** the matter of discretion however seeks an additional clause to recognise the technical or operational need for critical infrastructure to clear indigenous vegetation.	Amend ECO-MD1 as follows: **Indigenous vegetation clearance** 1. The extent to which the proposal adequately identifies indigenous biodiversity values including whether any naturally occurring species that are threatened, at risk, or reach their national or regional distribution limits in the District, or any naturally uncommon ecosystems listed in ECO-SCHED3 are present and if so, how they will be protected or managed. 2. The extent to which the proposal will achieve no net loss of indigenous biodiversity values identified as significant. 3. The actual or potential effects on indigenous biodiversity or ecological values, including intrinsic values, expected to occur as a result of the proposal, including those on ecosystem connectivity, function, and integrity and species diversity.

ECO – Matters of discretion	Submission	Relief Sought
		4. Any potential for avoiding, remedying, mitigating or otherwise offsetting or compensating for adverse effects on indigenous vegetation and habitats of indigenous fauna. 5. Any conditions to ensure obligations in respect of indigenous biodiversity endure, including beyond any changes of ownership (wholly or partially) of the landholding and review of conditions. 6. Where the clearance is within an ONL, ONF, SAL, ONC, VHNC, HNC, or any natural character of scheduled freshwater body setback, whether the indigenous vegetation proposed to be cleared contributes to the values of these areas and the degree to which the proposed clearance would adversely affect these values. 7. The relevance and quality of a Biodiversity Management Plan, if provided. 8. The extent of adverse effects on indigenous biodiversity in the coastal environment. 9. The extent to which, if any, the health of any indigenous vegetation and/or habitat of indigenous fauna is improved. 10. The extent to which, if any, the spatial extent of any indigenous vegetation and/or habitat of indigenous fauna is increased. 11. Adverse effects on Ngāi Tahu cultural values including mahinga kai and other customary uses, and access for these purposes. 12. <u>The functional or operational need for critical infrastructure to undertake vegetation clearance.</u>

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 1 – Part 2 District Wide Matters – Energy, Infrastructure

EI- General Submission	Submission	Relief Sought
Introduction and EI Chapter Structure	MainPower **opposes** the use of the multiple terms used for infrastructure in the plan i.e. 'regionally significant infrastrastructure', 'critical infrastructure' and strategic infrastructure'. MainPower prefers that the term 'important infrastructure' be used in the Proposed Waimakariri District Plan as this simplifies and streamlines the terminology for plan users.	**Amend** as required throughout the PDP to replace 'critical infrastructure', 'regionally significant infrastructure' and 'strategic infrastructure' with 'important infrastructure.

EI- General Submission	Submission	Relief Sought
	MainPower proposes a definition of 'Important Infrastructure' as per Mainpower's definitions submission Table 2.	
EI Chapter Structure	MainPower seeks that a rule list be inserted into the EI Chapter along with a hyperlink to each rule to make it easier for plan users to locate relevant rules.	**Insert** a rule list into the EI Chapter along with a hyperlink to each rule.
Other potentially relevant District Plan provisions.	MainPower **opposes** how the EI chapter links to the other district plan provisions. MainPower seeks that all relevant provisions applicable to the activities of Network Utility Operators be consolidated and located as far as possible in a single part of the plan. In addition, MainPower seeks that internal hyperlinks are placed into the EI chapter of the eplan to ensure plan users are able to navigate to other parts of the plan mentioned with ease. This provides clarity and certainty for all plan	**Insert/Amend** as follows: How this Chapter works and o~~O~~**ther potentially relevant District Plan provisions.** The Energy and Infrastructure chapter is designed to work in the following way: As required by the National Planning Standards unless relating specifically to a Special Purpose Zone, the 'Energy, Infrastructure and Transport' heading has been created to be self-contained for all energy, transport and infrastructure works and activities. Under the National Planning

EI- General Submission	Submission	Relief Sought
	users as to which rules apply. The current approach of listing the chapters that may apply is inadequate. Rule EI-R2 contains hyperlinks to the earthworks chapter and is a good example of how this could apply throughout the EI Chapter. **Reasons for Submission** From a plan usability perspective network utility operators and other plan users should not be expected to review the whole plan to determine which rules are applicable to their activities. The National Planning Standards dictate the plan structure and require provisions relating to energy and infrastructure that are not specific to a Special Purpose zone chapter or section "*must be located in one or more chapters under the Energy, Infrastructure and Transport heading*". The Planning standards go on to say this "*may*" include provisions relating to the management of reverse sensitivity effects between	Standards, it is permitted to have more than one chapter covering these matters under the 'Energy, Infrastructure and Transport' heading. In this Plan, energy and infrastructure matters are contained in a separate chapter to transport matters. The Energy and Infrastructure chapter is designed to work in the following way: 1. Except where hyperlinked this chapter sets out all provisions for energy and infrastructure activities. 2. Where a rule from another chapter has been hyperlinked within this chapter, the relevant associated objectives and policies also apply when assessing an application for resource consent. 3. Where an activity is within an Overlay, the associated objectives and policies from the relevant chapter for that overlay also apply when assessing an application for resource consent.

EI- General Submission	Submission	Relief Sought
	infrastructure and other activities. The current structure of the EI Chapter and the need to review most other plan provisions to determine what rules apply to the activities of network utility operators does not align with the planning standards directions.	~~As well as the provisions in this chapter, other District Plan chapters that contain provisions that may also be relevant to Energy and Infrastructure include:~~ • ~~Transport: the Transport rules apply to all activities and activities are subject to compliance with all relevant Transport rules. The application of the transport provisions is discussed further in the Transport rules.~~ • ~~Natural Hazards: this chapter contains provisions that may be relevant to managing the risk to energy and infrastructure from natural hazards.~~ • ~~Historic Heritage: this chapter contains provisions relevant to protecting places with heritage values, such as historic heritage buildings or other structures or their heritage settings.~~ • ~~Notable Trees: this chapter contains provisions relevant to matters such as protecting the root protection area or the trimming or removal of notable trees.~~ • ~~Sites and Areas of Significance to Māori: this chapter contains provisions relevant to protecting SASM from adverse effects.~~ • ~~Ecosystems and Indigenous Biodiversity: this chapter contains provisions that control SNAs and the clearance of areas of indigenous vegetation across the District.~~

EI- General Submission	Submission	Relief Sought
		• ~~Natural Character of Freshwater Bodies: this chapter contains provisions regarding activities within natural character of scheduled freshwater bodies setbacks.~~ • ~~Natural Features and Landscapes: this chapter contains provisions for activities within ONL, ONF, and SAL.~~ • ~~Subdivision: this chapter contains provisions that may be relevant to subdivision for energy and infrastructure.~~ • ~~Earthworks: this chapter contains provisions that may be relevant to earthworks for energy and infrastructure such as volume, depth and location.~~ • ~~Any other District wide matter that may affect or relate to the site.~~ • ~~Zones: the zone chapters contain provisions about what activities are anticipated to occur in the zones.~~
Corridor protection provisions **Rule EI-R54, EI-R55 and EI-R56**	MainPower seeks those provisions related to managing reverse sensitivity effects under EI-R54, EI-R55, EI-R56 and proposed new rule (structures near major electricity distribution lines) should be located in the relevant zone chapters where they will be easier for plan users	**Primary Relief:** **Relocate** EI-R54, EI-R55 and EI-R56 into the relevant zone chapters. The relevant zone chapters are: • General Residential zone • Large lot residential zone • General rural zone

EI- General Submission	Submission	Relief Sought
	to identify. That relief requires consequential amendments to the EI Chapter and all other relevant zone chapters for which major electricity distribution lines are located within. Submissions to this effect have been made on the relevant zone chapters. As an alternative relief to locating the corridor protection provisions within the relevant zone chapters MainPower may accept appropriate hyperlinks within the relevant zone chapters linking plan users back to the EI Chapter. However, it is noted that Mainpower's strong preference is to locate the corridor protection provisions within the relevant zone chapters. It is noted that MainPower is seeking changes to the corridor protection rules (EI-R54, EI-R55, EI-R56 and the new porposed rule relating to	• Rural lifestyle zone • General industrial zone • Open space zone • Settlement zone • Sport and active recreation zone • Natural open space zone **Delete** Rule EI-R54, EI-R55 and EI-R56 from the EI chapter. **Alternative relief:** **Insert** appropriate hyperlinks/rule into each of the applicable zone chapters to link back to the Rule EI-R54, EI-R55, EI-R56 and new proposed rule relating to structures near major electricity distribution lines.

EI- General Submission	Submission	Relief Sought
	structures near major electricity distribution lines.	

EI- Objectives and Policies	Submission	Relief Sought
EI-01 **Provision of energy and infrastructure**	MainPower **supports** Objective EI-01 but seeks to amend the objective to provide more clarity.	**Reword** Objective EI-01 as follows: **Provision of energy and infrastructure** Across the District: 1. is efficient, effective, resilient, safe; and ~~and~~ sustainable energy and infrastructure including critical infrastructure, strategic infrastructure and regionally significant infrastructure, is developed and maintained to benefit the social, economic, cultural and environmental well-being of the District, including in response to future needs such as increased sustainability and to recognise practical, technical and operational requirements. ~~changing techniques and technology~~; 2. there is increased renewable energy for national, regional and local use; and **3.** there is greater renewable electricity generation, including small scale or community scale renewable electricity generation, with generation surplus able to be supplied to the electricity distribution network.
EI-02 **Adverse effects of energy and infrastructure**	MainPower **supports** Objective EI-02 but seeks to amend this objective to recognise practical, technical and operational requirements.	**Amend** Objective EI-02 as follows:. **EI-O2** **Adverse effects of energy and infrastructure**

EI- Objectives and Policies	Submission	Relief Sought
		Adverse effects of energy and infrastructure on the qualities and characteristics of surrounding environments and community well-being are avoided, remedied or mitigated. ~~,~~while having regard to the social and economic benefits, technical and operational requirements of important infrastructure.
EI-03 **Effects of other activities and development on energy and infrastructure**	MainPower **supports** Objective EI-03 however seeks to amend the wording to provide more clarity.	**Amend** Objective EI-03 as follows: **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 constrained or compromised by activities and development, including by reverse sensitivity effects and incompatible activities.
EI-P1 **Recognising the benefits of, and providing for, energy and infrastructure**	MainPower **supports** Policy EI-P1 but seeks to add further clarity to recognise the functional and operational need of important infrastructureto locate in a particular area.	**Amend** EI-P1 as follows: **EI-P1** **Recognising the benefits of, and providing for, energy and infrastructure** Recognise the local, regional or national benefits of energy and infrastructure through: 1. enabling the operation, maintenance, repair, renewal, removal and minor upgrade of energy and infrastructure;

EI- Objectives and Policies	Submission	Relief Sought
		2. acknowledging that important infrastructure can have a functional or operational need to locate in a particular area; 3. providing for more than minor or significant upgrades to existing, and the development of new, energy and infrastructure; 4. providing for energy and infrastructure that serves as a lifeline utility during an emergency, including critical infrastructure, strategic infrastructure and regionally significant infrastructure; 5. providing for the effective, safe, secure and efficient electricity transmission, including on the National Grid, electricity distribution, and supply of fuel and energy; 6. providing for the effective, reliable and future-proofed communication networks and services; 7. providing for the effective, resilient, efficient and safe water supply, wastewater system and stormwater infrastructure; and community scale irrigation/stockwater; 8. enabling energy and infrastructure that has a particular focus on the utilisation of renewable resources and which contribute to sustainable use of natural and physical resources; 9. enabling feasibility investigations into renewable energy including for renewable electricity generation; 10. providing for renewable energy and renewable electricity generation including small scale or community scale renewable electricity generation; and 11. the provision of an adequate supply of water for firefighting in accordance with SNZ PAS 4509:2008 New

EI- Objectives and Policies	Submission	Relief Sought
		Zealand Fire Service Firefighting Water Supplies Code of Practice.
EI-P2 **Availability, provision and adequacy or, and connection to, energy and infrastructure.**	MainPower **supports** Policy EI-P2.	**Retain** EI-P2 as notified.
EI-P3 **New Technologies and techniques**	MainPower **supports** Policy EI-P3.	**Retain** EI-P3 as notified.
EI-P4 **Environmentally sustainable outcomes**	MainPower **supports** Policy EI-P4	**Retain** EI-P4 as notified.
EI-P5 **Manage adverse effects of energy and infrastructure**	MainPower **supports** Policy EI-P5. However notes than biodiversity offsets should not be applicable small scale network utility projects where there are no residual effects.	**Retain** EI-P5 as notified.

EI- Objectives and Policies	Submission	Relief Sought
EI-P6 **Effects of other activities and development on energy and infrastructure**	MainPower **supports** this Policy but seeks to amend the wording to provide further clarity.	**Amend** Policy EI-P6 as follows: Avoid ~~Manage~~ adverse effects of other activities and development on energy and infrastructure, including by the following: 1. ensuring such effects do not compromise or constrain access to or the safe, effective and efficient operation, maintenance, repair, replacement, upgrading and development of energy and infrastructure; and 2. with regards to the National Grid and major electricity distribution lines, in addition to (1) above, by ensuring that: a. safe buffer distances are identified in the District Plan for managing the effects of incompatible activities and development on the National Grid and major electricity distribution lines including support structures; b. sensitive activity and development that may compromise the National Grid and major electricity distribution lines, including those associated with intensive farming activities, are excluded from establishing within identified safe buffer distances; c. changes to existing activities within identified safe buffer distances do not further constrain or restrict the operation, maintenance, repair, upgrading and development of the National Grid and major electricity distribution lines; and 3. ensuring buildings, other structures and vegetation do not obstruct or otherwise adversely affect radiocommunication pathways, either individually or cumulatively, including for radiocommunication associated with critical infrastructure, strategic infrastructure, regionally significant infrastructure, a

EI- Objectives and Policies	Submission	Relief Sought
		lifeline utility, and for emergency purposes and day to day operations of an emergency service.

EI- Activity Rules – General	Submission	Relief Sought
EI- R1 **Maintenance or removal of existing infrastructure and ancillary vehicle access tracks.**	MainPower **supports** Policy EI-R1.	**Retain** EI-R1 as notified.
EI-R2 **Construction of new, or widening or extension of existing, vehicle tracks ancillary to infrastructure**	MainPower **supports** Rule EI-R2 as this provides a hyperlink to the relevant earthworks rules.	**Retain** EI-R2 as notified.
EI-R3 **Ancillary infrastructure equipment**	MainPower **supports** Rule EI-R3 but has sought to include telemetry equipment under the	**Retain** EI-R3 as notified.

EI- Activity Rules – General	Submission	Relief Sought
	definition of 'ancillary infrastructure equipment' as part of the definition submission in Table X,	
EI-R4 **Customer connection between a building, other structure, site, and infrastructure**	MainPower **supports** Rule EI-R4.	**Retain** EI-R4 as notified.
EI-R5 **Meteorological and environmental sensing and monitoring equipment, and navigational aid**	MainPower **supports** this rule as notified.	**Retain** Rule EI-R5 as notified:
EI-R6 **Trimming or removal of trees and vegetation**	MainPower **supports** Rule EI-R6.	**Retain** EI-R6 as notified.
EI-R7	MainPower **supports** Rule EI-R7 on the	**Retain** EI-R7 as notified.

EI- Activity Rules – General	Submission	Relief Sought
Freestanding pole in the road corridor	understanding that this rule anticipates poles that are a part of a electricity distribution line.	
EI-R8 **Installation of new infrastructure within an existing building**	MainPower **supports** Rule EI-R8.	**Retain** EI-R8 as notified.
EI-R9 **Use of temporary infrastructure**	MainPower **supports** Rule EI-R9. MainPower understands that the rule, as worded, would allow temporary electricity generation equipment as well as temporary overhead lines, for example, to be permitted to operate for longer than 12 months if that were required. Further	**Amend** EI-R9 as follows: . **EI-R9** **Use of temporary <u>and transportable</u> infrastructure** *This rule does not apply to new permanent emergency or back-up electricity generation provided for in EI-R36; or installation, maintenance, repair, upgrading or removal of new infrastructure for assessing a site or technology for suitability for renewable electricity generation provided for in EI-R39.* **All Zones** **Activity status: PER** Where: 1. the temporary infrastructure shall operate for a maximum of 12 months from the **Activity status when compliance not achieved: RDIS** **Matters of discretion are restricted to:** • EI-MD4 - Health and safety • <u>EI-MD3 – Operational considerations</u>

EI- Activity Rules – General	Submission	Relief Sought
	MainPower understands that this rule also relates to and permits temporary electricity generation activities that may be transportable.	commencement of the works or activity, or until the works or activity or a stage of the works or activity for which the temporary infrastructure is required is complete, whichever is greater, at which time the temporary infrastructure shall be removed from the site. • ~~EI-MD14 - Extent of effects~~
EI-R10 **Installation of new infrastructure, or upgrading of existing infrastructure, underground**	MainPower **supports** Rule EI-R10 as notified.	**Retain EI-R10** as notified.
EI-R11 **Relocation of infrastructure**	MainPower **supports** Rule EI-R11 as notified.	**Retain** EI-R11 as notified.
EI-R12	MainPower supports Rule EI-R12 but seeks to amend	**Amend** EI-R12 as follows: **EI-R12 Replacement of a pole or tower <u>(except where provided for under EI-R7)</u>**

EI- Activity Rules – General	Submission	Relief Sought		
Replacement of a pole or tower	the wording to provide more flexibility. When MainPower replace towers and poles the replacement structures will often be taller than the original pole or tower in order to comply with modern design standards and network requirements. These are often linked to safety requirements.	**All Zones**	**Activity status: PER** Where: 1. a pole shall not be replaced with a tower; 2. a replacement pole or tower does not exceed the height of the original pole or tower by more than 40 percent, measured from the top of the foundation. ~~3. a replacement pole or tower shall not exceed the height in relation to infrastructure of the replaced pole or tower;~~ 4. the diameter or width of a replacement pole shall not exceed twice that of the replaced pole at its widest point; 5. a single pole may be replaced with a pi-pole or H pole for safety or structural reasons and the width of of the Pi pole or H pole must not exceed three times that of the replaced pole at its widest point (including the cross-arm) ;	**Activity status when compliance not achieved: RDIS** **Matters of discretion are restricted to:** • EI-MD3 Operational considerations • ~~EI-MD14 - Extent of effects~~

EI- Activity Rules – General	Submission	Relief Sought
		6. the footprint of a replaced tower shall not exceed the width of the tower by more than 25%; and 7. a replaced pole or tower shall be removed once its replacement is in place and is operational.
EI-R14 **Replacement of an antenna**	MainPower **supports** EI-R14	**Retain** EI-R14 as notified.
EI-R13 **Addition to pole or tower**	MainPower **supports** Rule EI-R13 and the ability to mount equipment on support structures, however, proposes amendments to the rule to provide further clarity and provide more flexibility.	**Amend** EI-R13 as follows: **EI-R13** **Addition <u>of equipment</u> to a pole or tower** **All Zones** **Activity status: PER** Where: 1. <u>Equipment mounted on a support structure does not exceed a volume of 2m^3.</u> ~~2. the combined diameter or width of the existing pole or tower plus the addition (at its widest point) shall not exceed twice that of the existing pole or tower (at its widest point); and~~ **Activity status when compliance not achieved: RDIS** **Matters of discretion are restricted to:** • <u>EI-MD2 Amenity values, location and design</u> • <u>EI-MD3 Operational Considerations</u> • ~~EI-MD14 - Extent of effects~~

EI- Activity Rules – General	Submission	Relief Sought
		3. Equipment mounted on a support structure does not exceed the height of the existing pole or tower. ~~4. the combined height in relation to infrastructure of the existing pole or tower plus the addition shall not exceed that of the existing pole or tower.~~
EI-R15 **Replacement of an infrastructure cabinet or infrastructure building**	MainPower **supports** this rule but seeks amendments to provide more clarity and flexibility to upgrade and replace existing infrastructure cabinets, kiosks and infrastructure buildings.	Amend EI-R15 as follows: **EI-R15** **Replacement of an infrastructure cabinet, electricity cabinet and kiosk or infrastructure building unless provided for under new rule EI-X 'Electricity Cabinets and kiosks'.**

EI- Activity Rules – General	Submission	Relief Sought		
		All Zones	**Activity status: PER** Where: 1. the replacement shall not increase the footprint or the height of the existing infrastructure cabinet, electricity cabinet and kiosk or infrastructure building by more than 30%; and 2. the replacement infrastructure cabinet, electricity cabinet or infrastructure building is within 5m of the location of the original structure. ~~3. outside a road corridor, where an existing infrastructure building is located in or adjoining Residential Zones, Special Purpose Zone (Kāinga Nohoanga), or Special Purpose Zone (Pines Beach and Kairaki Regeneration), the replacement infrastructure building shall comply with the building internal boundary setback and where specified the height in relation to boundary for the zone or adjoining zone in accordance with Appendix APP3.~~	**Activity status when compliance not achieved: RDIS** **Matters of discretion are restricted to:** • EI-MD2 Amenity values, location and design • EI-MD3 Operational considerations ~~• EI-MD14 - Extent of effects~~
EI-R16	MainPower support this rule but seek wording be amended to provide	**Amend** EI-R16 as follows: **EI-R16**	**Upgrading and expansion of above-ground network utilities ~~lines, ducts, cables and pipes~~**	

EI- Activity Rules – General	Submission	Relief Sought		
Upgrading above-ground lines, ducts, cables and pipes	further clarity around the relationship with EI-R24 which deals with new overhead llines and supporting poles and towers. The word "addition" is defined but only references buildings. The definition should be amended so it applies to the context of this rule, or a different word should be chosen for this rule. **Reason for submission:** Where upgrading and expansion parameters in EI-R16 are not met the network infrastructure can no longer be said to	**All Zones**	**Activity status: PER** 1. Upgrading or expansion of existing above ground network utilities, except where provided for under Rule EI-24 Where: 2. upgrading is by: a. ~~the addition of~~ adding wires, cables, circuits or conductors; b. the re-conductoring of the line with higher capacity conductors; c. the re-sagging of conductors; d. ~~the addition of~~ installing longer or more efficient insulators; e. ~~the addition of~~ adding cross arms; f. the bundling of lines (in the absence of cross arms); g. ~~the addition of~~ installing earth wires (which may contain telecommunication lines, earthpeaks and lightning rods); h. the~~ir~~ replacement of any of the above; 3. the diameter of a replacement conductor or line shall not exceed the diameter of the existing conductor or line, or 50mm, whichever is greater; 4. additional conductors or lines: a. shall not increase the number of conductors or lines by more than 100%; and	**Activity status when compliance not achieved: ~~RDIS~~ CON** **Matters of discretion are restricted to:** • EI-MD3 Operational considerations • ~~EI-MD14 - Extent of effects~~

EI- Activity Rules – General	Submission	Relief Sought
	be being upgraded. Rather, it is more appropriate to describe the asset as 'new'. This should be reflected in the activity status that the asset is subjected to hence a controlled activity status has been proposed. As notified, the plan may create anomalous outcomes where a RDIS consent is required to upgrade a network asset, while a brand new asset in the same location would be a permitted activity. By treating upgrades that that do not comply with EI-R16 as "new activities"	b. shall each have a maximum diameter of 50mm; 5. additional cross arms shall not exceed the length of an existing cross arm by more than 100%, up to a maximum of 4m; 6. the bundling of lines (in the absence of cross arms) shall not exceed 100mm in total; and 7. the diameter of a replacement above-ground duct or pipe shall not exceed the diameter of the existing above-ground duct or pipe by more than 300mm.

EI- Activity Rules – General	Submission	Relief Sought
	anomalies of this kind can be avoided.	
EI-17 **Installation of new mid-span poles**	MainPower **supports** Rule EI-R17.	**Retain** EI-R17 as notified.
EI-R18 **Attachment of pipes, cables, conductors or lines, to bridges, tunnels or culverts**	MainPower **supports** Rule EI-R18 on the basis that MainPower can have as many clusters of earth peaks, conduits, ducts or pipes as required, as long as the clusters do not include more than two conduits, ducts or pipes.	**Retain** EI-R18 as notified.
EI-R19 **New infrastructure cabinet**	MainPower <u>supports</u> this rule on the proviso that electricity cabinets and kiosks are separated out	**Amend** EI-R19 as follows: **EI-R19 New infrastructure cabinet** **All Zones** — **Activity status: PER** — **Activity status when complian achieved: RDIS**

EI- Activity Rules – General	Submission	Relief Sought	
	to a separate more permissive rule.	1. New infrastructure cabinet, except where provided for under Rule EI-XX. Where: 2. a new infrastructure cabinet is located underground; or 3. a new above-ground infrastructure cabinet shall not exceed the following: a. when located in the road corridor adjoining: i. Residential Zones: 1. maximum height in relation to infrastructure: 1.8m; and 2. maximum floor area (excluding plinths or foundations): 1.4m^2; ii. all other zones: 1. maximum height in relation to infrastructure: 2m; and 2. maximum floor area (excluding plinths or foundations): 2m^2; b. when located outside the road corridor in: i. Residential Zones: 1. maximum height in relation to infrastructure: 2m; and	**Matters of discretion are restricted to:** • EI-MD1 - Historic heritage and the natural environment • EI-MD2 - Amenity values, location and design • EI-MD3 - Operational consideration

EI- Activity Rules – General	Submission	Relief Sought
		2. maximum floor area (excluding plinths or foundations): 2.5m^2; ii. all other zones: 1. maximum height in relation to infrastructure: 2.5m; and 2. maximum floor area (excluding plinths or foundations): 5m^2; and 4. a new infrastructure cabinet shall not be located in the following areas (except where located in a road corridor): a. the root protection area of a notable tree; and b. SNAs.
New EI Rule **Activity Rules – Electricity transmission and electricity distribution.** **Electricity Cabinets and kiosks**	MainPower seeks to **insert** a new rule relating to electricity distribution cabinets and kiosks. An area of 13m^2 is sought as, typically, Mainpower's easements for such	**Insert** a new rule as follows: **EI-RXX** **Electricity cabinets and kiosks** **All Zones** **Activity status: PER** Where: 1. The electricity cabinet and kiosk does not exceed: a. 2m in height b. 13m^2 in area **Activity status when compliance not achieved: CON** **Matters of discretion are restricted to:**

EI- Activity Rules – General	Submission	Relief Sought
	equipment are 13m^2 in area so MainPower seek flexibility to install equipment to the full extent of the easement. Although typically, such equipment ranges in size from 3m^2 to 10m^2 in area to allow for a walkaround area for serving and maintnence of the equipment. MainPower would like to retain flexibility without having a consenting burden for such equipment.	2. The electricity cabinet and kiosk is not located in the following areas (except where located in a road corridor): a. The root protection area of a notable tree; and b. SNA's • EI-MD1 - Historic heritage and the natural environment • EI-MD2 - Amenity values, location and design • EI-MD3 - Operational consideration
EI-R20 **New infrastructure building**	MainPower seek to amend EI-R20 such that this rule does not apply to equipment covered under the proposed new rule	**Amend EI-R20 as follows:** **EI-R20** **New infrastructure building** **All Zones** **Activity status: PER** **Activity status when compliance not achieved: RDIS**

EI- Activity Rules – General	Submission	Relief Sought		
	above or EI-R25. Amendments to the rule are proposed to reflect this.		1. <u>New infrastructure building (except where covered by Rule EI-XX and Rule EI-R25)</u> Where: 2. a new infrastructure building located in the road corridor shall comply with the following: a. maximum floor area (excluding plinths or foundations): 10m^2; and b. maximum height in relation to infrastructure: 3m; 3. a new infrastructure building located outside the road corridor shall comply with the following: a. maximum height in relation to infrastructure: 5.5m; b. maximum floor area (excluding plinths or foundations): 30m^2; c. in or adjoining Residential Zones, Special Purpose Zone (Kāinga Nohoanga), or Special Purpose Zone (Pines Beach and Kairaki Regeneration), shall comply with building height in relation to boundary and internal boundary	**Matters of discretion are restricted to:** • EI-MD1 - Historic heritage and the natural environment • EI-MD2 - Amenity values, location and design • EI-MD3 - Operational considerations

EI- Activity Rules – General	Submission	Relief Sought
		setbacks for the zone or adjoining zone; and 4. a new infrastructure building shall not be located in the following areas (except where located in a road corridor): a. the root protection area of a notable tree; b. SASM; c. SNAs; d. ONF, ONL and SAL; and e. areas of ONC, VHNC and HNC.
EI-R22 **Activities that generate electric and magnetic fields**	MainPower **supports** EI-R22.	**Retain** EI-R22 as notified.
EI-R23 **Construction of new vehicle access tracks ancillary to infrastructure which are located in specified sensitive environments**	MainPower **supports** EI-R23	**Retain** EI-R22 as notified.

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought
EI- R24 **New overhead transmission lines and electricity distribution lines and supporting poles and to wers**	MainPower **supports** EI-R23	**Retain** EI-R22 as notified.
EI-R25 **Transformers, substations, switching stations, and energy storage batteries (not enclosed within a building)**	MainPower supports EI-R25 however seeks to amend the rule to provide more clarity. As per Mainpower's general submission linkages are required from the EI chapter to any other relevant chapter rules applicable to the activities under this rule.	**Amend** EI-R25 as follows: **EI-R25** **Transformers, substations, switching stations, and energy storage batteries (not enclosed within a building)** *This rule does not include new permanent emergency or back-up electricity generation provided for in EI-R36.* **All Zones** **Activity status: PER** 1. <u>The establishment of a new, or expansion of any existing substation, switching station or energy storage</u> **Activity status when compliance not achieved: RDIS**

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought	
	MainPower notes that 'transformers' are referred to in multiple rules. While transformers can be installed as part of both electricity cabinets and kiosks as well within substations the rules could be rationalised to improve plan usability.	batteries (not enclosed within a building). Where: 2. The activity does not exceed an area of: a. 300m^2 in the General Rural Zone b. 40m^2 in any other zone. ~~3. new transformers, substations, switching stations, and energy storage batteries are ancillary to electricity transmission and electricity distribution;~~ ~~4. the activity shall comply with the following when located in the road corridor:~~ ~~a. maximum floor area (excluding plinths or foundations): 10m^2;~~ ~~b. maximum height in relation to infrastructure: 3m;~~ ~~5. the activity shall comply with the following when located outside the road corridor:~~ ~~a. maximum height in relation to infrastructure: 5.5m;~~	**Matters of discretion are restricted to:** • EI-MD1 - Historic heritage and the natural environment • EI-MD2 - Amenity values, location and design • EI-MD3 - Operational considerations

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought
		~~b. maximum floor area (excluding plinths or foundations): 30m²;~~ ~~c. in or adjoining Residential Zones, Special Purpose Zone (Kāinga Nohoanga), or Special Purpose Zone (Pines Beach and Kairaki Regeneration), shall comply with building height in relation to boundary and internal boundary setbacks for the zone or adjoining zone; and~~ 6. the activity shall not be located in the following areas (except where located in a road corridor): a. the root protection area of a notable tree; b. SASM; c. SNAs; d. ONF, ONL and SAL; e. areas of ONC, VHNC and HNC; f. natural character of scheduled freshwater bodies setbacks; and g. places adjoining the coastal marine area.

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought
EI-R27 **New radiocommunication and telecommunication facilities attached to buildings**	MainPower **supports** EI-R27.	**Retain** Rule EI-R27 as notified.
EI-R35 **Transformers, substations, switching stations, and energy storage batteries (not enclosed within a building)**	MainPower **opposes** EI-R35 as it is a direct duplication of EI-R25.	**Delete** Rule EI- R35
EI-R36 **New permanent emergency or back-up electricity generation**	MainPower **supports** Rule EI-R36 but seeks amendments to the matters of discretion.	**Amend** EI-R36 as follows: **EI-R36** **New permanent emergency or back-up electricity generation** *This rule does not apply to temporary portable or transportable electricity generation provided for in EI-R9.* **All Zones** **Activity status: PER** **Activity status when compliance not achieved: RDIS**

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought
		Where: 1. new permanent emergency or back-up electricity generation (including any associated energy storage batteries): a. is not the primary electricity supply to the site; and b. shall comply with the built form standards for the relevant zone or overlay. **Matters of discretion are restricted to:** • EI-MD3- Operational considerations • ~~EI-MD14 - Extent of effects~~
EI- R39 **New infrastructure for assessing a site or technology for suitability for renewable energy**	MainPower **supports** Rule EI-R39 as notified.	**Retain** EI-R39 as notified.

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought
including renewable electricity generation		
EI-R40 **New solar cell(s) for small scale or community scale renewable electricity generation**	MainPower supports this Rule EI-R40.	**Retain** EI-R40 as notified.
EI-R48 **Requirement to provide water supply for firefighting**	MainPower **support** Rule EI-R48 but seek clarification as to whether the rule applies to network utility infrastructure which meet the definition of a building. MainPower seeks appropriate exemptions	**Amend EI-R48 as follows:** **EI-R48** **Requirement to provide water supply for firefighting** **All Zones** **Activity status: PER** Where: 1. provision for sufficient water supply and access to water supplies for firefighting is available to all buildings (excluding accessory buildings and <u>infrastructure buildings</u> that are not habitable buildings) via the District Council's reticulated water supply (where available) in accordance with **Activity status when compliance not achieved: RDIS** **Matters of discretion are restricted to:** • EI-MD11 - Requirement to provide water supply for firefighting

EI – Activity Rules – Electricity generation and electricity distribution	Submission	Relief Sought		
	to provide clarity as to which network utility infrastructure is intended to be captured by this rule.		the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice; or 2. where a reticulated water supply compliant with SNZ PAS 4509:2008 is not available, or the only supply available is the controlled restricted rural type water supply which is not compliant with SNZ PAS 4509:2008, water supply and access to water supplies for firefighting shall be in accordance with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	**Notification** An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified only to Fire and Emergency New Zealand where the consent authority considers this is required, absent its written approval.

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
EI-R54 **Earthworks adjacent to a 66kV or 33kV electricity distribution line**	MainPower support this rule as it ensures the major electricity distribution lines are protected from earthworks and land disturbance activities within the vicinity of these lines. The 66kv and 33kv electricity lines are mapped on the planning maps and collectively referred to as 'major electricity distribution lines'. This terminology	**Amend** EI-R54 as follows: **EI-R54 Earthworks adjacent to a major ~~66kV or 33kV~~ electricity distribution line** **All Zones** **Activity Status: PER** Where: 1. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 2. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity **Activity status when compliance not achieved: ~~RDIS~~ NC** **~~Matters of discretion are restricted to:~~** ~~• EI-MD13 - Major electricity distribution lines~~ **Notification** An application for a non-complying ~~restricted discretionary~~ activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
	should also be used within the rules for consistency. **Reasons for Submission:** It is acknowledged that these rules generally are consistent with the New Zealand Electrical Code of Practice (NZECP 34: 2001) for Electrical Safe Distances ('the code of practice') however the code of practice does not provide sufficient protection from earthworks activities adversely interfering with	distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and ~~3. earthworks shall not exceed 3m in depth between 6m and 10m from the visible outer edge of a foundation of a 66kV or 33kV electricity distribution line pole or tower;~~ c.earthworks shall not destabilise a major ~~66kV or 33kV~~ electricity

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
	the support structures and associated foundations of Major Electricity Distribution Lines. By duplicating the requirements of the code of Practice in the Proposed District Plan Rules, MainPower and Council are able to improve safety and avoid significant costs, time and effort associated with remedial works required or rectifying damage that has occurred.	distribution line pole or tower; and a. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to:

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
	MainPower are seeking the same consistent approach as adopted in the Christchurch and Hurunui District Plans and proposed in the Selwyn District Plan for Orion and MainPower.	• earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which ~~a dispensation~~ prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; ~~• vertical holes not exceeding 500mm in diameter provided they:~~ ~~○ are more than 1.5m from the visible outer edge of a pole or stay wire; or~~ ~~○ are a post hole for a farm fence or horticultural structure more than 6m from the visible outer edge of a tower.~~ **Advisory Notes** • ~~66kV/33kV~~ major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
		activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances.
EI-R55 **Network utilities within 10m of the centre line of a 66kV or 33kV electricity distribution line**	MainPower **supports** EI-R55 but seeks a minor amendment to provide consistency with terminology used.	**Amend** EI-R55 as follows: **EI-R55** **Network utilities within 6~~10~~m of the centre line of a major ~~66kV or 33kV~~ electricity distribution line** **All Zones** **Activity status: PER** Where: 1. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note**

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
		• ~~66kV/33kV~~ major electricity distribution lines are shown on the planning map.
EI-R56 **Activities and development (other than earthworks or network utilities) adjacent to a 66kV or 33kV electricity distribution line**	MainPower supports RI-R56 but seeks to amend the rule to provide further clarity	**Amend EI-R56 as follows:** **EI-R56** **Activities and development (other than earthworks or network utilities) adjacent to a ~~66kV or 33kV~~ major electricity distribution line** **All Zones** **Activity status: NC** Where: 1. activities and development adjacent to a major ~~66kV or 33kV~~ electricity distribution line involve the following: a. new sensitive activity and new buildings (~~excluding accessory buildings~~) within 6 ~~10~~m of the centreline of a ~~66kV or 33kV~~ **Activity status when compliance not achieved: N/A**

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
		major electricity distribution line or within ~~10~~6m of the foundation of a support structure ~~visible outer edge of a foundation of an associated pole or tower;~~ or b. complies with the requirements of NZECP34:2001. ~~c. new fences more than 2.5m high and within 5m of the visible outer edge of a foundation for a 66kV or 33kV electricity distribution line, pole or tower.~~ **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
		only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • ~~66kV/33kV~~ major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances.
New rule for insertion in to relevant zone chapters:	MainPower seek a new rule be **inserted** into the relevant zone chapters to	**Insert** a new EI Rule EI-XX as follows: **EI-RXX** **Structures near a ~~66kV or 33kV~~ major electricity distribution line** **All Zones** **Activity status: NC** **Activity status when compliance not achieved: NC**

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
Structures near major electricity distribution lines	address structures near major electricity distribution lines.	1. The establishment of a new, or expansion of an existing structure: Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001

Activity Rules- Managing effects of activities and development on major electricity distribution lines.	Submission	Relief Sought
		Notification An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Matters of Discretion	Submission	Releif Sought
EI-MD1 **Historic heritage, cultural values and the natural environment**	MainPower **supports** EI-MD1.	**Retain** EI-MD1 as notified.
EI-MD2	MainPower **supports** EI-M21 however seek to add	**Amend EI-MD2 to include a new clause as follows:**

Matters of Discretion	Submission	Releif Sought
Amenity values, location and design	and additional clause to align with EI—MD1 (2)	The extent to which infrastructure has a functional need or operational need for its location, the practicality of avoidance, and the viability of alternative locations, routes, sites, structures and construction methods.
EI-MD3 **Operational considerations**	Mainpower **supports** EI-MD3.	**Amend EI-MD3 as follows:** **Operational considerations** 1. The extent to which the location and scale of structures proposed are necessary to meet the operational need or functional need of the infrastructure and the customers infrastructure serves. 2. The extent to which placing infrastructure underground is ~~unreasonable~~ possible in terms of technical constraints, additional costs or environmental effects. 3. The extent to which there is any risk to, and effects on, the operation, maintenance, upgrading and development of the infrastructure. 4. The extent to which buildings, other structures or vegetation obstruct or otherwise adversely affect radiocommunication pathways, either individually or cumulatively, and the extent to which such adverse effects can be avoided, remedied or mitigated.
EI-MD5 **Electricity generation**	MainPower supports this assessment matter but seeks to add an additional clause to acknowledge the locational constraints faced by infrastructure.	**Amend EI-MD5 to include a new clause as follows:** The extent to which infrastructure has a, locational, functional or operational need for its location, the practicality of avoidance, and the viability of alternative locations, routes, sites, structures and construction methods.

Matters of Discretion	Submission	Releif Sought
EI-MD6 **Electricity transmission and** **electricity distribution**	MainPower **supports** this assessment matter.	**Retain** EI-MD6 as notified.
EI-MD9 **Construction of new, or widening or extension of existing, vehicle access tracks ancillary to infrastructure**	MainPower **supports** this assessment matter.	**Retain** EI-MD6 as notified.
EI-MD10 **Relocation of existing infrastrcuture**	MainPower **supports** this assessment matter.	**Retain** EI-MD6 as notified.
EI-MD13 **Major electricity distribution lines**	MainPower seeks that the activity status for rules linking to this matters of discretion be a non-complying activity. Therefore this matter of	**Delete EI-MD13**

Matters of Discretion	Submission	Releif Sought
	discretion ought to be deleted.	
EI-MD14 **Extent of effects**	MainPower object to this catch all assessment matter as it provides no certainty to plan users as to what Council's discretion relates to.	**Delete EI-MD14** ~~**EI-MD14**~~ ~~**Extent of effects**~~ ~~1. The extent of compliance with the relevant standard(s), and the extent of any effects of non-compliance with the relevant standard(s) including cumulative effects.~~

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 7 – Part 2 District Wide Matters – Historic Heritage

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant historic heritage provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the historic heritage chapter. This is to ensure that plan users can navigate to the relevant parts of the historic heritage chapter with ease. As currently structured network utility operators and other plan users are required to read the whole historic heritage chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to the relevant historic heritage rules contained in the historic heritage chapter.

HH - Objective	Submission	Relief Sought
HH-O1 **Contribution to the District**	MainPower recognises the importance of historic values to the community and **supports** the objective as notified.	**Adopt** Objective HH-O1 as notified

HH – Policies	Submission	Relief Sought
HH-P7 **Siting of Infrastructure**	MainPower **supports** the objective as notified but seeks an amendment to recognise and provide for the continued operation of existing infrastructure as well as upgrading, maintenance and repair.	**Amend** HH-P7 as follows: **Siting of infrastructure** Ensure the siting of new infrastructure protects the heritage values of historic heritage listed in HH-SCHED2, taking into account the functional need or operational need for the siting of the infrastructure while also recognising and providing for the maintenance, repair and upgrade of existing infrastructure**.**

HH- Activity Rules	Submission	Relief Sought
HH-R3 **Construction of a structure, building or addition to a building within any historic heritage setting listed**	MainPower **supports** the rule in principle but notes there is no provision to provide for customer connections to electricity.	**Amend** Rule HH-R3 as follows: **Activity status: PER** Where: 1. any structure or building or addition to a building is less than $10m^2$ in GFA and 2m in height;

in HH-SCHED2.		2. the activity is necessary for the maintenance, repair and replacement of an existing car park, accessway, driveway or paved area <u>or installation of a customer electricity connection and associated infrastructure</u>**.**
HH-R5 **Alteration of or addition to historic heritage item listed in HH-SCHED2**	MainPower **supports** the rule as notified, in particular identifying any non-compliance as a restricted discretionary activity, and any notification being limited to HNZPT in respect to sites on the New Zealand Heritage List where the consent authority considers this is required, absent of its written approval.	**Adopt** Rule HH-R5 as notified.

HH – Matters of discretion	Submission	Relief sought
HH-MD1 **Adverse effects on heritage values**	MainPower **supports** the matter of discretion as notified as it recognises the functional and operational need of infrastructure.	**Adopt** HH-MD1 as notified.

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~.

Table 8 – Mapping

District Plan Mapping	Submission	Relief Sought
Major electricity distribution lines setbacks	MainPower seek that the Major Electricity Distribution setback corridor be **deleted** from the planning maps and to rely on the mapping of the actual Major Electricity Distributions Lines only. MainPower are concerned that the GIS mapping of the setback corridor may not be accurate. If the mapping is inaccurate, then this may be confusing and misleading for plan users. What is more, the setback varies depending on the activity at issue, and so it is not simply a matter of drawing a generic corridor over the mapped lines. It is preferable to state the relevant setback distances clearly	**Delete** the major electricity distribution setback corridor from the planning maps,

District Plan Mapping	Submission	Relief Sought
	and specifically in the Plan rules and allow landowners to measure the setbacks accurately in respect of their own property, rather than purport to show the setback on the maps. This approach is consistent with The Christchurch District Plan and Proposed Selwyn District Plan where just the lines are mapped.	
Major electricity distribution lines mapping	MainPower seek that a more distinct colour be used to map the Major Electricity Distribution Lines as currently the lines are mapped with a pale grey colour which is not clear for plan users to identify easily.	**Amend** the planning map layer illustrating the Major Electricity Distribution Lines to a more conspicuous colour.
Major electricity distribution lines mapping	MainPower support the mapping of the Major Electricity Distribution Lines on the Planning Maps.	**Adopt** the Major Electricity Distribution Lines Planning Map layer.

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 1 – Area Specific Matters – GRZ General Residential Zone

General Submission	Submission	Relief Sought
General Residential Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the General Residential Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities. Policy - Separation of incompatible activities

General Submission	Submission	Relief Sought
		Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
General Residential zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones. MainPower have a strong preference that corridor protection rules be located appropriately within the	**Insert** the following new rule: **Earthworks adjacent to a major electricity distribution line** **Activity Status: PER** Where: 1. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 2. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
	relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator

General Submission	Submission	Relief Sought
		(other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from **Trees**) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** — **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Where: 1. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 1. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Notification** **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** — **Activity status when compliance not achieved: NC** 1. The establishment of a new, or expansion of an existing structure:

General Submission	Submission	Relief Sought
		Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Table 2 – Area Specific Matters – LLRZ Large Lot Residential Zone

General Submission	Submission	Relief Sought
Large Lot Residential Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the Large Lot Residential Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities. Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
Large Lot Residential Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought	
	Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones. MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property.	3. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 4. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances,	**Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
	In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must

General Submission	Submission	Relief Sought
		comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** - Where: 2. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		2. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances.

General Submission	Submission	Relief Sought
		Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Notification An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Table 3 – Area Specific Matters – GRUZ General Rural Zone

General Submission	Submission	Relief Sought
General Rural Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the General Rural Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities.

General Submission	Submission	Relief Sought
		Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
General Rural Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones.	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: 5. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 6. Meet the following requirements: **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is

General Submission	Submission	Relief Sought
	MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. required, absent its written approval. **Exemptions** This rule does not apply to:

General Submission	Submission	Relief Sought
		• earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line**

General Submission	Submission	Relief Sought
		Activity status: PER Where: 3. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 3. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		Notification An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** — **Activity status when compliance not achieved: NC** 1. The establishment of a new, or expansion of an existing structure:

General Submission	Submission	Relief Sought
		Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought

Table 4 – Area Specific Matters – RLZ Rural Lifestyle Zone

General Submission	Submission	Relief Sought
Rural Lifestyle Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the Rural Lifestyle Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities.

General Submission	Submission	Relief Sought
		Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
Rural Lifestyle Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones.	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: 7. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 8. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
	MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track;

General Submission	Submission	Relief Sought
		• earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** — **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Where: 4. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 4. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Notification** **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought

Table 5 – Area Specific Matters – GIZ General Industrial Zone

General Submission	Submission	Relief Sought
General Industrial Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the General Industrial Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities. Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects,

General Submission	Submission	Relief Sought
		from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
General Industrial Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones. MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: 9. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 10. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
	applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances;

General Submission	Submission	Relief Sought
		Advisory Notes • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** Where: 5. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note**

General Submission	Submission	Relief Sought
		• Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 5. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Activity status when compliance not achieved: N/A** **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes**

General Submission	Submission	Relief Sought
		• Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Table 6 – Area Specific Matters – OSZ Open Space Zone

General Submission	Submission	Relief Sought
Open Space Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the Open Space Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities. Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
Open Space Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: 11. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly

General Submission	Submission	Relief Sought	
	easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones. MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	12.Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions**	notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
		This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances.

General Submission	Submission	Relief Sought
		Insert the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** Where: 6. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 6. activities and development adjacent to a major electricity distribution line involve the following: **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule:

General Submission	Submission	Relief Sought	
		Structures near a major electricity distribution line **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification**	**Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Table 7 – Area Specific Matters – STEZ Settlement Zone

General Submission	Submission	Relief Sought
Settlement Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the Settlement Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities.

General Submission	Submission	Relief Sought
		Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
Settlement Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones.	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: 13. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 14. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
	MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track;

General Submission	Submission	Relief Sought
		• earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** — **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Where: 7. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 7. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Notification** **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Table 8 – Area Specific Matters – SARZ Sport and Active Recreation Zone

General Submission	Submission	Relief Sought
Sport and Active Recreation Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the Sport and Active Recreation Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities. Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.

General Submission	Submission	Relief Sought
Sport and Active Recreation Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone. Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones. MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property.	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: 15. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 16. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and **Activity status when compliance not achieved: NC** **Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
	In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances, unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes**

General Submission	Submission	Relief Sought
		• Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** - Where: 8. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note** • Major electricity distribution lines are shown on the planning map.

General Submission	Submission	Relief Sought
		Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: 8. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Activity status when compliance not achieved: N/A** **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map.

General Submission	Submission	Relief Sought
		• Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Table 9 – Area Specific Matters – NOSZ Natural Open Space Zone

General Submission	Submission	Relief Sought
Natural Open Space Zone	MainPower seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines operated by MainPower within the Natural Open Space Zone.	**Insert** the following new objective and policy: Objective: The operation and security of critical infrastructure, strategic infrastructure and regionally significant infrastructure is not compromised by other activities. Policy - Separation of incompatible activities Protect critical infrastructure, strategic infrastructure and regionally significant infrastructure by avoiding adverse effects, including reverse sensitivity effects, from incompatible activities by avoiding buildings, structures and any sensitive activities that may compromise the operation of Electricity Distribution Lines within an identified buffer corridor.
Natural Open Space Zone	MainPower seeks to insert corridor protection rules relating to Electricity Distribution Lines into the General Residential Zone chapter rules as lines are located within or immediately adjacent to that zone.	**Insert** the following new rule: **Earthworks adjacent to major electricity distribution line** **Activity Status: PER** Where: **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought	
	Provisions relating to corridor protection for MainPower's Electricity Distribution Lines do not fall easily into the National Planning Standards framework because while they relate to infrastructure, they restrict land use activities and subdivision, and apply to specific zones. MainPower have a strong preference that corridor protection rules be located appropriately within the relevant zone chapters. From a usability perspective, it is most logical to include land use constraints associated with Electricity Distribution Lines in the applicable zone chapters where they are clearly visible to land owners who may check the plan to determine rules affecting their property. In addition to the above, MainPower is of the view the width of the corridor protection is excessive and can be reduced to 6m.	17. Earthworks shall be setback at least 6m from the centreline of the Major Electricity Distribution Line as shown on the planning maps or; 18. Meet the following requirements: a. be no deeper than 300mm within 2.2m of the foundation of the major electricity distribution line support structure; and b. be no deeper than 0.75m between 2.2m and 6m from the foundation of the major electricity distribution line support structure; and c. earthworks shall not destabilise a major 66kV or 33kV electricity distribution line pole or tower; and d. earthworks shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 in NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances,	**Notification** An application for a non-complying activity under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

General Submission	Submission	Relief Sought
		unless the requirements of Clause 2.2.3 of NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances are met. **Exemptions** This rule does not apply to: • earthworks undertaken as part of agricultural or domestic cultivation; or repair, sealing or resealing of a road, footpath, driveway or vehicle access track; • earthworks that are undertaken by a network utility operator or their approved contractor on behalf of the network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); • earthworks for which prior written consent has been granted by the relevant electricity distribution line operator under the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances; **Advisory Notes** • Major electricity distribution lines are shown on the planning maps. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must

General Submission	Submission	Relief Sought
		comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Insert** the following new rule: **Network utilities within 6 of the centre line of a major electricity distribution line** **Activity status: PER** - Where: 9. the network utility complies with the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. **Activity status when compliance not achieved: NC** **Advisory Note** • Major electricity distribution lines are shown on the planning map. Insert the following new rule: **Activities and development (other than earthworks or network utilities) adjacent to a major electricity distribution line** **Activity status: NC** Where: **Activity status when compliance not achieved: N/A**

General Submission	Submission	Relief Sought
		9. activities and development adjacent to a major electricity distribution line involve the following: a. new sensitive activity and new buildings within 6m of the centreline of a major electricity distribution line or within 6m of the foundation of a support structure; or b. complies with the requirements of NZECP34:2001. **Notification** An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval. **Advisory Notes** • Major electricity distribution lines are shown on the planning map. • Vegetation to be planted around electricity distribution lines should be selected and managed to ensure that it will not breach the Electricity (Hazards from Trees) Regulations 2003. • The NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances contains restrictions on the location of activities and development in relation to electricity distribution lines. Activities and development in the vicinity of these lines must comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances.

General Submission	Submission	Relief Sought
		Insert the following new rule: **Structures near a major electricity distribution line** **Activity status: NC** 1. The establishment of a new, or expansion of an existing structure: Where: 2. The structure is within 6m of the centreline of a major electricity distribution line as shown on the planning maps; or 3. The structure is within 6m of the foundation of a support structure of a major electricity distribution line as shown on the planning maps, or 4. Complies with the requirements of NZECP34:2001 **Activity status when compliance not achieved: NC**

General Submission	Submission	Relief Sought
		Notification An application under this rule is precluded from being publicly notified, but may be limited notified only to the relevant electricity distribution line operator where the consent authority considers this is required, absent its written approval.

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 10 – Part 2 District Wide Matters – Natural character of freshwater bodies

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant natural character of freshwater bodies provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the natural character of freshwater bodies provisions chapter. This is to ensure that plan users can navigate to the relevant parts of the natural character of freshwater bodies chapter with ease. As currently structured network utility operators and other plan users are required to read the whole natural character of freshwater bodies chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to the relevant natural character of freshwater bodies rules.

Objective	Submission	Relief Sought
NATC-01, 02 and 03	MainPower **supports** objectives 01, 02 and 03 as notified.	**Adopt** NATC-01, 02, and 03 as notified.

NATC – Policies	Submission	Relief Sought
NATC-P5 **Structures within surface freshwater body setbacks**	MainPower **supports** the policy but seeks further clarity.	**Amend** NATC-P5 as follows: Enable activities <u>(including the maintenance, repair, upgrade, development and operation of critical infrastructure)</u> that have a functional need or operational need to be located within the freshwater body setbacks, provided that adverse effects on natural character values are avoided, remedied or mitigated.
NATC-P6 New and existing structures within and over freshwater bodies	MainPower **supports** the policy but seeks further clarity.	**Amend** NATC-P6 as follows: Provide for new structures, and upgrades to existing structures, on the surface of freshwater where: 1. public access to, and along, the freshwater body is maintained; 2. the structure<u>, or any critical infrastructure,</u> has a functional need or operational need to be located on the surface of freshwater; 3. the structure does not compromise the use of the surface of freshwater for existing users; 4. the structure does not disturb the habitat of indigenous species or hinder passage of migratory fish species; 5. the structure avoids creating new, or exacerbating existing natural hazards, or river or stream bank erosion; and 6. any adverse effects to the natural character and cultural values, associated with freshwater bodies are avoided, remedied or mitigated in order to preserve those values.

NATC - Proposed Plan Reference	Submission	Relief Sought
NATC-R7 **Addition to an existing building or structure**	MainPower **supports** the rule as notified.	**Adopt** Rule NATC-R7 as notified.
NATC-R8 **New structures within and over freshwater bodies**	MainPower supports this rule and the requirement for a RDIS consent.	**Adopt** NATC-R8 as notified.
NATC-R9 **New building or structure**	MainPower **supports** this rule as notified.	**Adopt** NATC-R8 as notified.

Activity Standards	Submission	Relief Sought
NATC-S1 **Setback standards for the natural character of freshwater bodies**	MainPower **supports** NATC-S1 as notified.	**Adopt** NATC-S1 as notified.
NATC-S2 **Building and structure reflectivity**	MainPower **supports** NATC-S2 as notified.	**Adopt** NATC-S2 as notified.

NATC – Matters of discretion	Submission	Relief Sought
NATC-MD2 **Maintaining and enhancing public access**	MainPower **supports** NATC-MD2	**Adopt** NATC-MD2 as notified.
NATC-MD4 **Buildings, structures and impervious surfaces within freshwater body setbacks**	MainPower **supports** this matter of discretion as notified in principle. MainPower, however, seeks to provide further clarity by adding a further matter of discretion around the functional and operational need to locate in the setback and the ability to carry out maintenance, repair, upgrade and development of critical infrastructure.	**Adopt** NATC-MD4 as follows: 1. <u>The functional and operational need of critical infrastructure to locate within setbacks or for a network utility to carry out maintenance, replacement, repair and upgrade.</u>
NATC-MD5 **Structures within and over freshwater bodies**	MainPower **supports** the matter of discretion, however, seeks an additional clause to ensure consideration is given to the functional an operational need of critical infrastructure to locate over freshwater bodies.	**Amend** NATC-MD5 as follows: **Structures within and over freshwater bodies** 1. The extent to which the location and size of the structure will impede flood waters or restrict navigation. 2. The extent to which the structure compromises amenity values, ecological, cultural, or recreational values, including any natural character values associated with the surface of water, including: a. minimisation of the footprint; b. visual appearance of the structure and whether design features are sympathetic with the surrounding landscape; and

NATC – Matters of discretion	Submission	Relief Sought
		c. any impacts upon īnanga spawning locations. 3. The extent to which the structure would create new, or exacerbate existing flood risk, or stream bank erosion. 4. The extent to which the structure would compromise public access to, or along the freshwater body. 5. The technical, functional or operational need for the structure to be located within or over the freshwater body. 6. Where Te Ngāi Tūāhuriri Rūnanga has been consulted, the outcome of that consultation, and how the development or activity responds to, or incorporates the outcome of that consultation. 7. <u>For critical infrastructure, any functional or operational need to locate over a freshwater body.</u>

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are **underlined** and deletions ~~**strikethrough**~~

Table 11 – Part 2 District Wide Matters – Natural features and landscapes

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant natural features and landscape provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the natural features and landscapes chapter. This is to ensure that plan users can navigate to the relevant parts of the natural features and landscapes chapter with ease. As currently structured network utility operators and other plan users are required to read the whole	**Insert** appropriate hyperlinks from the EI chapter to the relevant natural features and landscapes rules contained in the natural features and landscapes chapter.

General Submission	Submission	Relief Sought
	natural features and landscapes chapter to determine what rules are applicable or not.	

NFL – Policies	Submission	Relief Sought
NFL-P1 **Protect Outstanding Natural Features**	MainPower **supports** this policy, but while the policy seeks to recognise and protect identified outstanding natural features and landscapes, it does not acknowledge instances where it is necessary to both locate important infrastructure within those areas as a result of functional or operational need or to also undertake maintenance and repair of infrastructure. Therefore, MainPower seek to **amend** this policy to recognise this.	**Amend** NFL-P1 as follows: Recognise the values of the outstanding natural features identified in NFL-APP1 and protect them from the adverse effects of activities and development by: 1. avoiding use and development that detracts from the very high biophysical values and high sensory and associative values identified in NFL-APP1 for the Waimakariri River; 2. avoiding use and development that detracts from the very high biophysical and sensory values, and high associative values of the Ashley River/Rakahuri Saltwater Creek Estuary identified in NFL-APP1, including on: a. coastal physical processes; b. ecological habitat and indigenous biodiversity; and c. the experience of the elements and processes of (a) and (b); 3. enabling community scale erosion and flood control structures where adverse impacts on the values are mitigated; 4. avoiding any significant loss of indigenous vegetation;

NFL – Policies	Submission	Relief Sought
		5. avoiding activities such as plantation forestry, woodlots, shelterbelts, mining and quarrying activities and large buildings or groups of buildings or other structures which create adverse effects on the identified values; 6. providing for existing rural production where this does not detract from the identified values; and 7. enabling conservation activities and non-motorised recreation activities~~.~~; and 8. recognise that, due to locational, operational and technical requirements, network utilities may need to be located within areas with natural environment values.
NFL-P3 **Protect Outstanding Natural Landscapes**	MainPower **supports** this policy, but while the policy seeks to recognise and protect identified outstanding natural features and landscapes, it does not acknowledge instances where it is necessary to both locate important infrastructure within those areas as a result of functional or operational need or to also undertake maintenance and repair of infrastructure. Therefore, MainPower seek to **amend** this policy to recognise this.	**Amend** NFL-P3 as follows: Recognise the values of the outstanding natural landscapes identified in NFL-APP1 and protect them from the adverse effects of activities and development by: 1. avoiding use and development that detracts from the very high biophysical values and high sensory and associative values of the Puketeraki Range and Oxford Foothills identified in NFL-APP1, in particular on the: a. exposed alpine environments; b. sheltered densely forested slopes and gullies of the Oxford Hills; c. indigenous vegetation; and d. recreational values;

NFL – Policies	Submission	Relief Sought
		2. avoiding use and development in areas which have no capacity to absorb change, including near ridgelines, and mitigating adverse effects through bulk, location and design controls in other areas; 3. avoiding any significant loss of indigenous vegetation; 4. avoiding activities such as plantation forestry, shelterbelts, mining and quarrying activities which create adverse effects on the identified values; 5. providing for existing rural production where this does not detract from the identified values; and 6. enabling conservation activities and non-motorised recreation activities~~.~~; and 7. recognise that, due to locational, operational and technical requirements, network utilities may need to be located within areas with natural environment values.
NFL-P4 **Maintain Significant Amenity Landscapes**	MainPower **supports** this policy, but while the policy seeks to recognise and protect identified outstanding natural features and landscapes, it does not acknowledge instances where it is necessary to both locate important infrastructure within those areas as a result of functional or operational need or to also undertake maintenance and repair of infrastructure. Therefore, MainPower seek to **amend** this policy to recognise this.	**Amend** NFL-P4 as follows: Recognise the values of the significant amenity landscapes identified in NFL-APP1 and maintain them by: 1. managing adverse effects of use and development on the moderate-high biophysical values and high sensory and associative values of the Ashley River/Rakahuri identified in NFL-APP1, in particular on the: a. braided river system; b. indigenous fauna and vegetation; c. the wilderness and natural environment; and d. recreational values;

NFL – Policies	Submission	Relief Sought
		2. enabling community scale erosion and flood control structures where adverse impacts on the values are mitigated; 3. avoiding any significant loss of indigenous vegetation; 4. avoiding incompatible activities, including plantation forestry, shelterbelts, mining and quarrying activities, and large buildings or groups of buildings or other structures which create unacceptable adverse effects on the identified values; 5. mitigating through bulk, location and design controls the adverse effects of other uses and development in areas which have no capacity to absorb change; 6. providing for non-motorised recreation activities and conservation activities; and 7. providing for existing rural production where this does not detract from the identified values~~.~~; and 8. recognise that, due to locational, operational and technical requirements, network utilities may need to be located within areas with natural environment values.

NFL - Proposed Plan Reference	Submission	Relief Sought
NFL-R5 **Structures and buildings**	MainPower **supports** the rule however seeks an amendment to provide for the replacement, maintenance and repair, and realignment of existing utility poles as a permitted activity.	**Amend** Rule NFL-R5 as follows: **NFL-R5** **Structures and buildings**

NFL - Proposed Plan Reference	Submission	Relief Sought		
		This rule does not apply to structures and buildings provided for under NFL-R1 to NFL-R4, NFL-R8, or natural hazards mitigation structures for flooding.		
		Waimakariri River ONF **Puketeraki Range & Oxford Foothills ONL** **Ashley River / Rakahuri SAL**	**Activity status: PER** Where: 1. each individual structure or building shall have a maximum footprint of 10m^2, except that this shall not apply to post and rail or wire fences which are more than 75% visually transparent. 2. The structure is an existing utility pole, line or cable that is, realigned, replaced, maintained,	**Activity status when compliance not achieved in the Puketeraki Range and Oxford Foothills ONL: RDIS** **Matters of discretion are restricted to:** • NFL-MD1 - New buildings and structures, additions to buildings and access tracks **Activity status when compliance not achieved in the Waimakariri River ONF and Ashley River / Rakahuri SAL: NC**

NFL - Proposed Plan Reference	Submission	Relief Sought
		repaired or upgraded. **Ashley River / Rakahuri Saltwater Creek Estuary ONF** **Activity status: NC** **Activity status when compliance not achieved: N/A**
NFL-R6 **Access tracks and parking areas**	MainPower notes that EI-R2 covers construction of new, or widening or extension of existing, vehicle access tracks ancillary to infrastructure in all zones. On this basis it is understood that Rule NFL-R6 would not be applicable to network utilities as this would be a duplication.	MainPower **seeks clarification** be provided that this rule is not applicable as the matter is covered by EI-R2.

NFL – Matters of discretion	Submission	Relief Sought
NFL-MD1 **New buildings and structures, additions to buildings and access tracks**	MainPower **supports** the matter of discretion as notified as this provides for consideration of the functional and operational need for the location of infrastructure.	**Adopt** NFL-MD1 as notified.

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are **underlined** and deletions ~~**strikethrough**~~

Table X – Part 2 District Wide Matters – Natural Hazards

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant natural hazards provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the natural hazards chapter. This is to ensure that plan users can navigate to the relevant parts of the natural hazards chapter with ease. As currently structured network utility operators and other plan users are required to read the whole	**Insert** appropriate hyperlinks from the EI chapter to relevant natural hazards rules contained in the natural hazards chapter.

General Submission	Submission	Relief Sought
	natural hazards chapter to determine what rules are applicable or not to network utilities.	

NH - Objective	Submission	Relief Sought
NH-01 **Risk from natural hazards**	MainPower **supports** Objective NH-01 as notified.	**Retain** NH-01 as notified.
NH-O2 **Infrastructure in natural hazard overlays**	MainPower **supports** the objective as clause 3 provides the ability to locate critical infrastructure in a high flood hazard area if there is a functional or operational need. MainPower also strongly supports the objective enabling existing infrastructure to be upgraded, maintained and replaced.	**Retain** NH-02 as notified: **NH-O2** **Infrastructure in natural hazard overlays** For infrastructure within natural hazard overlays: 1. existing infrastructure can be upgraded, maintained and replaced; 2. new non-critical infrastructure _does not increase the risk to life or property from natural hazard, including coastal hazard, events and is designed to maintain its integrity and ongoing function during and after natural hazard events, or is easily replaced; 3. critical infrastructure is avoided in high flood hazard areas and high coastal flood hazard areas, unless there is a functional need or operational need for the location or route.

NH - Objective	Submission	Relief Sought
NH-O3 **Natural hazard mitigation**	MainPower **supports** the objective as adverse effects on infrastructure will be avoided or mitigated.	**Retain** NH-O3 as notified.
NH-O4 **Natural defences**	MainPower **supports** the objective as notified	**Retain** NH-O4 as notified:

NH- Policies	Submission	Relief Sought
NH-P1 **Identification of natural hazards and a risk-based approach**	MainPower supports this NH-P1.	**Retain** NH-P1 as notified.
NH-P10 **Maintenance and operation of existing infrastructure**	MainPower **supports** policy NH-P10 as notified.	**Retain** NH-P10 as notified
NH-P11 **New below ground infrastructure and upgrading of infrastructure**	MainPower **supports** the policy as notified.	**Retain** NH-P11 as notified.

NH- Policies	Submission	Relief Sought
outside of high hazard areas		
NH-P12 **New below ground infrastructure and upgrading of infrastructure within high flood hazard areas**	MainPower **supports** the policy as notified.	**Retain** NH-P12 as notified.
NH-P13 **New above ground critical infrastructure and upgrading of critical infrastructure within high flood hazard areas**	MainPower **supports** the policy as notified.	**Retain** NH-P13 as notified.
NH-P14 **New infrastructure and upgrading of infrastructure within fault overlays**	MainPower **supports** the policy in principle but seeks amendments to specifically recognise the operational and functional need of critical infrastructure to locate in identified fault avoidance areas.	**Amend** NH-P14 as follows: **New infrastructure and upgrading of infrastructure within fault overlays** Within the fault overlays: 1. provide for new and upgrading of existing ~~**not**~~ **non** critical infrastructure below and above ground in the Ashley Fault Avoidance Overlay where: a. it does not increase the risk to life or property from a natural hazard event; and

NH- Policies	Submission	Relief Sought
		b. it does not result in a reduction in the ability of people and communities to recover from a natural hazard event; 2. avoid new and upgrading of existing critical infrastructure below and above ground in the Ashley Fault Avoidance Overlay unless there is no reasonable alternative **<u>or there is an operational need or functional need</u>**, in which case the infrastructure must be designed to: a. maintain, as far as practicable, its integrity and ongoing operation during and after natural hazard events; or b. be able to be reinstated in a timely manner; 3. enable small scale critical infrastructure and other infrastructure in the Fault Awareness Overlay, while ensuring that larger critical infrastructure does not increase the risk to life or property from natural hazard events unless: a. there is no reasonable alternative **<u>or there is an operational or functional need</u>**, in which case the infrastructure must be designed to maintain, as far as practicable, its integrity and ongoing operation during and after natural hazard events; or b. be able to be reinstated in a timely manner.
NH-P19 **Other Natural Hazards**	MainPower **supports** Policy NH-P19 as notified.	**Retain** NH-P19 as notified.

NH – Proposed Plan Reference	Submission	Relief Sought
NH-R4 **Below ground infrastructure and critical infrastructure**	MainPower **supports** the rule as notified.	**Retain** Rule NH-R4 as notified.
NH-R6 **Above ground critical infrastructure**	MainPower **supports** the rule in principle but has concerns there will be a consenting burden in relation to above ground linear infrastructure. As such MainPower are of the view that there should be a permitted activity pathway for both new overhead electricity distribution lines and support structures. On this basis a new rule has been proposed below to separate out above ground linear critical infrastructure. Amendments are proposed to NH-R6 to ensure the permitted footprint area in clause 'c' reflects the size of the typical easement area for Mainpower's cabinets and kiosks. MainPower are also concerned that a FFL certificate may be required for all infrastructure when this is not necessary for poles or towers etc.	**Amend** NH-R6 as follows: **Above ground critical infrastructure** (not covered by new rule Rule NH-RX) **Activity status: PER** Where: 1. if located with**in** the Fault Awareness Overlay, new critical infrastructure or an extension to existing infrastructure has a footprint of less than 100m^2; and 2. if located within a Flood Assessment Overlay or the Kaiapoi Fixed Minimum Finished Floor Level Overlay: a. the profile, contour or height of the land is not permanently raised by more than 0.25m when compared to natural ground level; and b. the infrastructure is located on a site outside of high flood hazard area as stated in a Flood Assessment Certificate issued in accordance with NH-S1; or c. new infrastructure or an extension to existing infrastructure: i. has a footprint of less than **~~10~~13m^2**; or

NH – Proposed Plan Reference	Submission	Relief Sought
	Further clarification is required around this.	ii. is located above ground level, excluding any support base, towers or poles, at an elevation higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with NH-S1; or iii. has a finished floor level equal to or higher than the minimum finished floor level as stated in a Flood Assessment Certificate issued in accordance with NH-S1; and d. new buildings, or extensions to existing buildings that increase the footprint of the existing infrastructure, are not located within an overland flow path as stated in a Flood Assessment Certificate issued in accordance with NH-S1.
Insert a new rule: **Above ground linear critical infrastructure and support structures**	MainPower seeks to **insert** a new Rule to cover above ground linear critical infrastructure and support structures. From a network operational perspective MainPower have an obligation irrespective of any land management and planning requirements of the local authority. Thus, when a customer premises is already located within or adjacent to a particular land management area, it is not an option for MainPower to simply avoid installing network in that area because that land has been classified in a particular way. In these situations, where the installation of network	**Insert** the following new rule: **NH-R4** **Above ground linear critical infrastructure and support structures** **Fault Awareness Overlay** **Urban Flood Assessment Overlay** **Activity status: PER**

NH – Proposed Plan Reference	Submission	Relief Sought
	cannot be avoided, equipment is designed and reinforced to reflect the particular environment. For example, a more heavy duty pole is used.	**Kaiapoi Fixed Minimum Finished Floor Level Overlay** **Non-Urban Flood Assessment Overlay**
NH-R14 **New and upgrading of above ground and below ground critical infrastructure**	MainPower **supports** the rule in principle but considers it is overly restrictive where it applies to the linear above and below ground infrastructure and associated support structures. MainPower may have a functional and operational need to locate in the Ashley Fault Avoidance Overlay where there may be a customer connection required for example. In the event of an earthquake, the aforementioned assets can be readily re-established during an emergency event. This was illustrated during the Canterbury Earthquake sequence of 2010-11.	**Amend** NH-R14 as follows: **Activity status: DIS** Where: 1. the critical infrastructure involves any of the following: a. electricity substations, **~~networks~~**, and transmission and distribution installations, including the National Grid **~~and the electricity distribution~~ network**; b. supply and treatment of water for public supply; c. stormwater and sewage treatment and disposal systems; d. radiocommunication and telecommunication installations and networks; e. strategic road and rail networks; petroleum storage and supply facilities;

NH – Proposed Plan Reference	Submission	Relief Sought
NH-R17 **Above ground critical infrastructure**	MainPower **supports** the rule in principle but seeks the footprint to be increased to 13m² so that the typical cabinet and kiosk used by MainPower can be accommodated without the burden of requiring a resource consent. MainPower have specific design criteria that are followed when constructing infrastructure in areas subject to flooding therefore the assets are always constructed at a height to minimise the impact of flooding.	**Amend** Rule NH-R17 as follows: **Activity status: PER** Where: 1. the profile, contour or height of the land is not permanently raised by more than 0.25m when compared to natural ground level; and a. new infrastructure or an extension to existing infrastructure has a footprint of less than **~~10~~13**m²; or b. any new building that is identified as being subject to 0.29m or less of coastal flooding as stated in a Coastal Flood Assessment Certificate and has finished floor level equal to or higher than the minimum finished floor level as stated in a Coastal Flood Assessment Certificate issued in accordance with NH-S2; or c. if not a building, new infrastructure, excluding any support base, towers or poles, is located above ground level at an elevation higher than the minimum floor level as stated in a Coastal Flood Assessment Certificate issued in accordance with NH-S2. **Activity status where compliance is not achieved: for NH-R17 (1), NH-R17 (1)(a) and NH-R17 (1)(c): RDIS** **Matters of discretion are restricted to:** • NH-MD3 - Natural hazards and infrastructure

NH – Proposed Plan Reference	Submission	Relief Sought
		• EI-MD3 **Activity status where compliance is not achieved for NH-R17 (1)(b): RDIS (see NH-R17 (2))**
NH-R18 **Below ground infrastructure and critical infrastructure**	MainPower **supports** the rule as notified.	**Adopt** the rule as notified.

NH – Proposed Natural Hazard Standard	Submission	Relief Sought
NH-S1 **Flood Assessment Certificate**	MainPower **supports** NH-S1 and the requirement for a flood hazard certificate. However, the drafting of the rule is unclear and results in confusion as to how the need for a flood assessment certificate will be determined and applied to network utilities.	**Adopt** NH-S1 as notified.

NH – Proposed Natural Hazard Standard	Submission	Relief Sought
	Main Power seeks that any process requiring a flood hazard certificate is efficient and costs are transparent.	
NH-S2 Coastal Flood Assessment Certificate	MainPower **supports** this NH standard however seeks to ensure the CFAC will not be required for infrastructure such as poles and towers and the like.	**Adopt** NH-S1 as notified subject to further clarification sought.

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General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 13 – Part 2 District Wide Matters – Notable Trees

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant notable tree provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the notable trees chapter. This is to ensure that plan users can navigate to the relevant parts of the notable trees chapter with ease. As currently structured network utility operators and other plan users are required to	**Insert** appropriate hyperlinks from the EI chapter to the relevant notable tree rules contained in the notable trees chapter.

General Submission	Submission	Relief Sought
	read the whole notable trees chapter to determine what rules are applicable or not.	

TREE – Policy	Submission	Relief Sought
TREE-P4 **Maintenance of notable trees**	MainPower **supports** Policy TREE P4 as notified particularly clause 3 which recognises it may be necessary to mitigate adverse effects of a notable tree on critical infrastructure.	**Retain** Policy Tree P4 as notified.
TREE-P5 **Removal of notable trees**	MainPower **supports** the policy as notified, particularly clause 4 which recognises the need to avoid adverse effects on the ongoing provision of infrastructure.	**Retain** TREE-P5 as notified.
Insert a new policy	MainPower proposes a **new policy** to provide for limited physical works to and around notable trees for cultivation, maintenance, safety purposes, or network utilities.	**Insert** a new policy as follows: **TREE- P6** Provide for limited physical works to and around trees listed in TREE-SCHED1, for cultivation, maintenance, safety purposes, or network utilities where those works are required due to locational, technical or operational requirements.

TREE – Proposed Plan Reference	Submission	Relief Sought
TREE-R2 **Gardening or earthworks within any root protection area of any Notable Tree**	MainPower **supports** the rule on the basis that it provides for the use of trenchless methods.	**Adopt** TREE-R2 as notified.
TREE-R3 **Overhead lines work or maintenance to any Notable Tree**	MainPower **supports** the rule as notified. It is essential to provide for maintenance or works to trees to maintain public safety and security of electricity supply.	**Adopt** TREE-R3 as notified.
TREE-R6 **Removal of any Notable Tree that is unsafe**	MainPower **supports in part** the rule as notified, particularly provision to remove a damaged tree that poses a significant risk to critical infrastructure. It is, however, unclear what constitutes a 'severe event' as set out in clause 2. This term needs to be further clarified for plan users.	Clarify the term / use of 'severe event' at clause 2, but otherwise, **Adopt** TREE-R6 as notified.

TREE – Matters of discretion	Submission	Relief Sought
TREE-MD1 **Pruning, root protection area,**	MainPower **supports** the matter of discretion in principle but notes there are no assessment	**Amend** NFL-MD1 as follows: 1. The character and degree of modification, damage, or destruction of the values of the tree, including the cultural significance of taonga species.

TREE – Matters of discretion	Submission	Relief Sought
trunk and crown, removal	matters relating to the maintenance, repair, upgrade or installation of new network utilities.	2. The extent to which the activity will or may adversely affect the health or structural integrity or visual appearance of the tree. 3. The extent to which the activity will be undertaken in a manner consistent with accepted arboricultural standards, practices and procedures. 4. The duration and frequency of the activity and the effect on the tree. 5. The resilience of the tree, in relation to structural soundness and health and any irreversible effect on the tree. 6. The scope for the tree to recover from, or compensate for, any effects from pruning, work in the root protection area or modification of the trunk and crown. 7. In relation to a listed group of trees, the extent to which the activity will or may adversely affect the health or structural integrity of the wider group or undermine its unity, setting or other collective significance. 8. The extent to which any proposed compensation for the removal of the tree mitigates the loss of the tree and its values. 9. <u>The need for the activity to undertake any maintenance, repair, upgrade of existing network utilities or the operational and functional need of network utilities.</u>
TREE-MD2 Extent of benefit or need for the activity or works	MainPower **supports** the matter of discretion but notes there are no assessments matters relating to the maintenance, repair, upgrade or installation of new network utilities.	**Amend** TREE-MD2 as follows: 1. The need for the activity to deal with an emergency situation, or to avoid significant risk of effects on human health and safety, or adverse effects on infrastructure, including critical infrastructure. 2. The extent of benefits associated with the use and development of the site for activities anticipated by the zoning for the site. 3. The extent of benefits associated with the infrastructure, whether there is a functional need or operational need for that location and whether there are any practical alternatives.

TREE – Matters of discretion	Submission	Relief Sought
		4. The extent to which the activity will or will not enhance amenity values beyond that achievable by arboricultural or property management alternatives. 5. The significance of the tree and extent of loss of notable tree values and amenity values within and beyond the site. 6. <u>The need for the activity to undertake any maintenance, repair, upgrade of existing network utilities or the operational and functional need of network utilities.</u>

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General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table X – Part 2 District Wide Matters – Sites and Areas of Significance to Māori

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant Sites and Areas of Significance to Māori provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the Sites and Areas of Significance to Māori chapter. This is to ensure that plan users can navigate to the relevant parts of the Sites and Areas of Significance to Māori chapter with ease. As currently structured network utility operators and other plan users are required to read the whole Sites and Areas of Significance to Māori chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to the relevant sites and areas of significance to Māori rules contained in the sites and areas of significance to Māori chapter.

SASM – Proposed Plan Reference	Submission	Relief Sought
Insert a new Policy	MainPower seeks to include a **new** policy which recognises the operational and functional need to locate critical or important infrastructure within Site and Areas of Significance to Māori where there is no other reasonable alternative.	**Insert** a new policy as follows: <u>Recognise that critical infrastructure may have an operational and functional need to locate within areas and site of significance to Māori where there are no other reasonable alternatives.</u>
SASM-R4 **Earthworks and land disturbance associated with other activities**	MainPower **supports** this rule on the basis that clause 'f' would allow MainPower to undertake earthworks (to land previously disturbed and to the depth already disturbed) associated with the maintenance, repair, upgrade or operation of existing infrastructure. MainPower also supports clause 'h', which enables works for customer connections pursuant to EI-R4. MainPower support the need for a RDIS consent for earthworks within the cultural overlay areas where such activities fall outside the permitted activity standards.	**Adopt Rule** SASM-R4 as notified.

SASM – Matters of discretion	Submission	Relief sought
SASM-MD1 **Wahi tapu and wahi taonga**	MainPower **supports** the matter of discretion as notified in that it recognises the functional and operational need of infrastructure.	**Adopt** SASM-MD1 as notified
SASM-MD2	MainPower **supports** the matter of discretion as notified in that it recognises the functional and operational need of infrastructure.	**Adopt** SASM-MD2 as notified

Nga turanga tupuna		
SASM-MD3 **Nga wai**	MainPower **supports** the matter of discretion as notified in that it recognises the functional and operational need of infrastructure.	**Adopt** SASM-MD2 as notified

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General Relief Sought
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Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 15 – Part 2 District wide matters – SD – Rautaki ahunga -Strategic Directions

Section/subsection/Provision	Submission	Relief Sought
Interpretation and application of this chapter	MainPower **opposes** this section in part. The interpretative notes for this chapter state that (our emphasis): For the purpose of District Plan implementation, including the determination of resource consent applications: 1. the SD may provide guidance for related objectives and policies in other chapters; and	**Amend** as follows: *1. the SD ~~may~~ provides guidance for related objectives and policies in other chapters; and* *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.~~*

Section/subsection/Provision	Submission	Relief Sought
	2. the relevant objectives and policies of the DP, including SD in this chapter, are to be considered together and no hierarchy exists between them. MainPower seeks changes to clarify the relationship between the SD Chapter and other chapters in the proposed Plan. In MainPower's view the Strategic Directions Chapter should have primacy over the other objectives and policies in other chapters of the Plan.	
SD-01 **Natural environment**	MainPower **supports** this objective.	**Retain** Objective SD-01 as notified.
SD-02 Urban Development	MainPower **supports** this objective.	**Retain** Objective SD-02 as notified.
SD-03 **Energy and infrastructure**	MainPower **supports** this objective however seeks to amend SD-03 to provide more clarity and prescription. MainPower **opposes** the use of the multiple terms used for infrastructure in the plan i.e. 'infrastructure', 'regionally	**Amend** Objective SD-03 as notified: **SD-03** **Energy and infrastructure**

Section/subsection/Provision	Submission	Relief Sought
	significant infrastrastructure', 'critical infrastructure' and strategic infrastructure'. MainPower prefers that the term 'important infrastructure' be used in the Proposed Waimakariri District Plan as this simplifies and streamlines the terminology for plan users. MainPower proposes a definition of 'Important Infrastructure' as per Mainpower's definitions submission Table X.	Across the District: 1. improved accessibility and multi-modal connectivity is provided through a safe and efficient transport network that is able to respond to technology changes and contributes to the well-being and liveability of people and communities; 2. the infrastructure needs of the community are fulfilled recognising the social, economic, environmental and cultural benefits that infrastructure provides. 3. Infrastructure~~: including strategic infrastructure, critical infrastructure~~ a. is able to operate efficiently and effectively; and b. is enabled, while: 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 reverse sensitivity effects and conflict between incompatible activities, including avoiding development which would limit the

Section/subsection/Provision	Submission	Relief Sought
		operation or development of existing and/or consented important infrastructure~~, regionally significant infrastructure and critical infrastructure.~~ ~~the adverse effects of other activities on infrastructure, including managing reverse sensitivity.~~ iii. avoiding adverse effects on the electricity distribution network and major electricity distribution lines, including by identifying a buffer corridor within which buildings, excavations and sensitive activities will generally not be provided for. 4. the nature, timing and sequencing of new development and new infrastructure is integrated and coordinated; and **5.** encourage more environmentally sustainable outcomes as part of subdivision and development, including though the use of energy efficient buildings, green infrastructure and renewable electricity generation.
SD-04 **Rural land**	MainPower **supports** this objective.	**Retain** Objective SD-04 as notified.

Section/subsection/Provision	Submission	Relief Sought
SD-06 **Natural hazards and resilience**	MainPower **supports** this objective however seeks additional text to recognise that important infrastructure in some instance have a technical and operational need to locate in areas subject to natural hazards.	**Retain** Objective SD-06 as notified. **Natural hazards and resilience** The District responds to natural hazard risk, including increased risk as a result of climate change, through: 1. avoiding subdivision, use and development where the risk is unacceptable; and 2. mitigating other natural hazard risks. 3. <u>Ensuring important infrastructure is only located within areas of significant natural hazard risk where there is no reasonable alternative and the important infrastructure is designed so as not to exacerbate natural hazard risk to people and property.</u>

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General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are **underlined** and deletions ~~**strikethrough**~~

Table X – Part 2 District Wide Matters – Subdivision

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant subdivision provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the subdivision chapter. This is to ensure that plan users can navigate to the relevant parts of the subdivision chapter with ease. As currently structured network utility operators and other plan users are required to read the whole subdivision chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to the relevant subdivision rules contained in the subdivision chapter.

Objective	Submission	Relief Sought
SUB-O2 **Infrastructure and transport**	MainPower **supports** the objective as notified as it encourages the	**Amend** SUB-O2 as follows:

Objective	Submission	Relief Sought
	efficient and sustainable provision of infrastructure.	Subdivision is designed and located in a way that supports the Efficient and sustainable provision, use and maintenance of infrastructure; and a legible, accessible, well connected transport system for all transport modes.

Policies	Submission	Relief Sought
SUB-P1 **Design and amenity**	MainPower **supports** SUB-P1 as clause 2 seeks to minimise reverse sensitivity effects on infrastructure.	**Adopt** SUB-P1 as notified.
SUB-P3 **Sustainable design**	MainPower **supports** SUB-P3 as it recognises the need to maintain the design capacity of infrastructure. Further clarity is proposed to ensure that subdivision design recognises the need to integrate with the electricity network.	**Amend** SUB-P3 as follows: Ensure that subdivision design: 1. maximises solar gain, including through: a. road and block layout; and b. allotment size, dimension, layout and orientation; 2. in Residential Zones, Commercial and Mixed Use Zones, and Open Space and Recreation Zones, supports walking, cycling and public transport; and 3. promotes: a. water conservation, b. on-site collection of rainwater for non-potable use, c. water sensitive design, and d. the treatment and/or attenuation of stormwater prior to discharge, and 4. recognises the need to maintain the design capacity of infrastructure within the public network and avoid causing flooding of downstream properties. 5. Recognises the need to integrate with electricity distribution network infrastructure to ensure new development is adequately serviced.

Policies	Submission	Relief Sought
SUB-P6	MainPower **supports** Policy SUB-P6 as notified.	**Adopt** SUB-P6 as notified.
SUB-P8 **Infrastructure**	MainPower **supports** the policy as notified.	**Adopt** SUB-P8 as notified**.**

SUB – Activity Rules	Submission	Relief Sought
SUB-R2 **Subdivision**	MainPower **supports** SUB-R1 as it provides for an exemption for unstaffed infrastructure allotments. MainPower understands this rule to exempt unstaffed infrastructure sites from complying with S2-S18.	**Adopt** SUB-R1 as notified.
New Rule **SUB-RX** **Subdivision and Major Electricity Distribution Lines**	MainPower seeks the **insertion** of a new corridor protection rule relating to subdivision in the vicinity of major electricity distribution lines.	**Insert a new rule as follows:** **SUB-RX** **Subdivision and Major Electricity Distribution Lines** All zones **Activity status: RDIS** Where: 1. the subdivision is within 24m of the centreline of the major electricity distribution lines as shown on the planning maps and: **Activity status when compliance with SUB-RX not achieved: NC**

SUB – Activity Rules	Submission	Relief Sought
		a. A building square for the principal building(s) and any building(s) for sensitive activities, is positioned at least 6m from the: i. Centreline of the major electricity distribution lines as shown on the planning maps; and ii. Foundation of any support structure of any major electricity distribution line as shown on the planning maps. **Matters of discretion are restricted to:** • Matters of control listed in SUB-MCDX – Effects on Major Electricity Distribution Lines

SUB – Activity Rules	Submission	Relief Sought
		Notification An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified only to MainPower New Zealand Limited, where the consent authority considers this is required, absent its written approval.

SUB – Subdivision standards	Submission	Relief Sought
SUB-S1 **Allotment sizes and dimensions**	MainPower supports SUB-S1 as allotments for unstaffed infrastructure are exempt from the minimum allotment site sizes.	**Adopt SUB-S1 as notified.**
SUB-S14 **Structures and buildings**	MainPower **supports** the rule in its notified form as it ensures any new allotment will be provided with an appropriate electricity supply and connection.	**Adopt** SUB-S14 as notified.

SUB – Subdivision standards	Submission	Relief Sought
SUB-S2-S18 **Subdivision standards**	MainPower seeks appropriate exemptions for network utility sites as required under these subdivision standards.	**Insert** appropriate exemptions to SUB-S2-S18 as required.

SUB – Matters of discretion	Submission	Relief Sought
SUB-MCD1 **Allotment area and dimensions**	MainPower **supports** the matter of control and discretion as notified.	**Adopt** SUB-MCD1 as notified.
SUB-MCD2 **Subdivision design**	MainPower **supports** the matter of control and discretion as notified, particularly clause 4 requiring consideration of how design will minimise reverse sensitivity effects on infrastructure.	**Adopt** SUB-MCD2 as notified.
SUB-MCD6 **Infrastructure**	MainPower **supports** the matters of discretion as notified however seeks an additional clause around the need for future subdivisions to identify on survey plans all existing electricity distribution lines and cables.	**Amend** SUB-MCD6 as follows: **SUB-MCD6** **Infrastructure** 1. The quantity, security and potability of the water and means, location and design of supply, including; a. for fire-fighting purposes; and b. the location, scale, construction and environmental, including public health, effects of water supply infrastructure and the adequacy of existing supply systems outside the subdivision.

SUB – Matters of discretion	Submission	Relief Sought
		2. The means, design, scale, construction and standard of stormwater infrastructure (including soakage areas and the means and location of any outfall). 3. The effectiveness and effects of any measures proposed for mitigating the effects of stormwater runoff, including the control of water-borne contaminants, litter and sediments. 4. The location, scale, construction and environmental effects of stormwater infrastructure, and whether or not the proposal requires on-site or area wide stormwater detention (either individually or collectively) to achieve stormwater neutrality or to meet any condition of regional network discharge consents. 5. Capacity of the stormwater drainage network. 6. The effect of the subdivision on water quality. 7. The extent to which the design of the stormwater infrastructure necessitates specific landscape treatment to mitigate any adverse effects on amenity values. 8. The means, design and standard of sewage treatment and disposal where a public reticulated wastewater system is not available. 9. The location, scale, construction, maintenance and environmental effects of the proposed wastewater system. 10. The adequacy and standard of electricity supply and connectivity to communication infrastructure including phone, internet and broadband. 11. <u>The integration of existing electricity infrastructure (including electricity distribution lines and cables), including whether that existing infrastructure will be adequately identified on approved survey plans and protected by necessary easements as required.</u>
New matters of control and	MainPower seeks to **insert** new of matters of control and discretion in	**Insert** new matters of control and discretion as follows:

SUB – Matters of discretion	Submission	Relief Sought
discretion in relation to major electricity distribution lines.	relation to the proposed new rule relating to effects on major electricity distribution lines.	SUB-MCDX Effects on major electricity distribution lines 1. The nature of the consent notice or other mechanism proposed to ensure that sensitive activities are established at a distance or in a position that does not adversely affect the existing major electricity distribution lines. 2. The extent to which the subdivision allows for earthworks, buildings and structures to comply with the safe distance requirements of the NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances. 3. The degree to which the subdivision design, including the location of roads and reserves, recognises and provides for existing electricity distribution lines so that reasonable access to the lines is maintained.

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 1 – Part 2 District wide matters – UFD – Urban Form and Development

Objectives	Submission	Relief Sought
UFD-O1 **Feasible development capacity for residential activities**	MainPower **supports** Policy UFD-O1 as notified.	**Retain** UFD-O1 as notified.
UFD-O2 **Feasible development capacity for commercial**	MainPower **supports** Policy UFD-O2 as notified.	**Retain** UFD-O2 as notified.

Objectives	Submission	Relief Sought
activities and industrial activities		

Policies	Submission	Relief Sought
UFD-P1 Density of residential development	MainPower **supports** Policy UFD-P1 as notified.	**Retain** UFD-P1 as notified.
UFD-P2 Identification/location of New Residential Development Areas	MainPower **supports** Policy UFD-P2 but seeks an additional clause that is applicable to both clause 1 and 2 to ensure infrastructure delivery is aligned with development.	**Amend** UFD-P2 to include the following new clause: 'provides for development of new residential development areas in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas'
UFD- P3 Identification/location and extension of Large Lot Residential Zone areas	MainPower **supports** Policy UFD-P3 but seeks an additional clause that is applicable to both clause 1 and 2 to ensure	**Amend** UFD-P3 to include the following new clause: 'provides for development of new large lot residential zone areas in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas'

Policies	Submission	Relief Sought
	infrastructure is delivery is aligned with development.	
UFD-P4 Identification/location and extension of Town Centre Zones	MainPower **supports** Policy UFD-P4 but seeks an additional clause to ensure infrastructure delivery is aligned with development.	**Amend** UFD-P4 to include the following additional clause: **UFD-P4** **Identification/location and extension of Town Centre Zones** Provide for the extension of existing Town Centres and locate and develop new commercial activities to implement the urban form identified in the Future Development Strategy, WDDS or Town Centre Plans, <u>in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas.</u>
UFD-P5 Identification/location and extension of Industrial Zones	MainPower **supports** Policy UFD-P5 but seeks an additional clause to ensure infrastructure is aligned with development.	**Amend** UFD-P5 to include the following additional clause: **UFD-P5** **Identification/location and extension of Industrial Zones** Provide for the extension of existing Industrial Zones and locate and develop new industrial activities to implement the urban form identified in the Future Development Strategy or WDDS, <u>whilst providing for the development of industrial zones in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas.</u>
UFD-P6	MainPower **supports** Policy UFD-P6 but seeks an additional clause to ensure	**Amend** UFD-P6 to include the following additional clause: **UFD-P6** **Mechanism to release Residential Development Areas**

Policies	Submission	Relief Sought
Mechanism to release Residential Development Areas	infrastructure is aligned with development.	The release of land within the identified new development areas of Kaiapoi, North East Rangiora and South East Rangiora occurs in an efficient and timely manner via a certification process to enable residential activity to meet short to medium-term feasible development capacity and achievement of housing bottom lines, whilst providing for development of residential development areas in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas'
UFD-P7 **Mechanism to provide additional Commercial and Mixed Use Zones**	MainPower **supports** Policy UFD-P7 but seeks an additional clause to ensure infrastructure is aligned with development.	**Amend** UFD-P7 to include the following additional clause: **UFD-P7** **Mechanism to provide additional Commercial and Mixed Use Zones** If proposed, ensure any plan change to create new, or expanded existing Commercial and Mixed Use Zones: 1. improve commercial self-sufficiency within the town and the Waimakariri District; 2. are commensurate to the population growth forecast for the town subject to the plan change; 3. consider and address any adverse effects that might undermine other town centres and local centres in the District; and 4. address any development capacity shortfall as identified in the Future Development Strategy or WDDS. 5. is informed through the development of an ODP. 6. provides for development in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas.

Policies	Submission	Relief Sought
UFD-P8 **Mechanism to provide additional Industrial Zones**	MainPower **supports** Policy UFD-P8 but seeks an additional clause to ensure infrastructure is aligned with development.	**Amend** UFD-P8 to include a new additional clause. **UFD-P8** **Mechanism to provide additional Industrial Zones** If proposed, ensure any plan change to create new, or expanded existing Industrial Zones: 1. manages adverse effects at the interface between Industrial Zones and arterial roads, Rural Zones, Residential Zones and Open Space and Recreation Zones, through methods such as building setbacks and landscaping; 2. provides for development of greenfield areas in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas; and 3. locates new Industrial Zones in locations adjacent to existing urban environments where it can be efficiently serviced by infrastructure. 4. is informed through the development of an ODP. 5. <u>provides for development of industrial zones in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas'</u>
UFD-P9 **Unique purpose and character of the Special**	MainPower **supports** Policy UFD-P9 but seeks an additional clause to ensure	**Amend** UFD-P9 to include an additional clause as follows: **UFD-P9** **Unique purpose and character of the Special Purpose Zone (Kāinga Nohoanga)**

Policies	Submission	Relief Sought
Purpose Zone (Kainga Nohoanga)	infrastructure is aligned with development.	Support a mix of development on Māori Land within the Special Purpose Zone (Kāinga Nohoanga) that: 1. enables Te Ngāi Tūāhuriri Rūnanga to fully occupy and use land in accordance with the principles and purposes for which the land was originally set aside; 2. will occur over generations and take place in different parts of the zone, and occur at different times; and 3. connects to reticulated infrastructure where available, but recognises that as public reticulated infrastructure is not available to all parts of the zone, alternative forms of onsite independent individual and communal infrastructure will be required. 4. <u>provides for development of Special Purpose Zone (Kainga Nohoanga) zones in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas'</u>
UFD-P10 **Managing reverse sensitivity effects from new development**	MainPower **supports** Policy UFD-P10 as notified however seeks to amend the policy to provide further clarity.	**Amend** UFD-P10 as follows: **Managing reverse sensitivity effects from new development** Within Residential Zones and new development areas in Rangiora and Kaiapoi: 1. avoid residential activity <u>and development</u> that has the potential to limit the efficient and effective operation<u>, maintenance, repair, development</u> and upgrade of ~~critical infrastructure, strategic infrastructure, and regionally significant infrastructure~~<u>, important infrastructure</u> including avoiding noise sensitive activities within the Christchurch Airport Noise Contour, unless within an existing Residential Zone;

Policies	Submission	Relief Sought
		2. minimise reverse sensitivity effects on primary production from activities within new development areas through setbacks and screening, without compromising the efficient delivery of new development areas.

Appendix One – Submission Details

General Relief Sought
MainPower seeks the amendments to the Proposed Waimakariri District Plan as detailed in the tables that follow, and including any alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Note: Proposed additions are underlined and deletions ~~strikethrough~~

Table 19 – Part 2 District Wide Matters – Noise

General Submission	Submission	Relief Sought
Plan Structure	MainPower, as part of the EI Chapter submission, **opposes** how the EI Chapter links to the other district plan provisions. MainPower seeks that all relevant noise provisions applicable to the activities of network utility operators be appropriately hyperlinked from the EI Chapter back to the noise chapter. This is to ensure that plan users can navigate to the relevant parts of the noise chapter with ease. As currently structured network utility operators and other plan users are required to read the whole noise chapter to determine what rules are applicable or not.	**Insert** appropriate hyperlinks from the EI chapter to the relevant noise rules contained in the noise chapter.

NOISE – Objective	Submission	Relief Sought
NOISE-O2 **Reverse sensitivity**	MainPower **supports** the objective as notified.	**Adopt** Noise-O2 as notified.

NOISE – Policy	Submission	Relief Sought
NOISE-P2 **Limited duration noise effects**	MainPower **supports** the objective as notified as it provides for temporary noise effects for a limited duration, including the use of generators during emergency situations.	**Adopt** NOISE-P2 as notified.

NOISE – Proposed Plan Reference	Submission	Relief Sought
NOISE-R9 **Temporary activities**	MainPower **supports** rule NOISE-R9	**Adopt** NOISE R9 as notified.
NOISE-R11 **Use of generators for emergency purposes**	MainPower **supports** rule NOISE-R11 as notified and understands that both generators and mobile equipment to supply electricity for emergency purposes are covered by this rule.	**Adopt** NOISE-R11 as notified.

NOISE – Matters of discretion	Submission	Relief Sought
NOISE-MD1 **Noise**	MainPower **supports NOISE** MD1 as notified.	**Adopt** NOISE-MD1 as notified.