

Further Submission by Transpower New Zealand Limited

Mackenzie District Plan: Proposed Plan Change 20 – Strategic Chapters

3 October 2022

Keeping the energy flowing



TRANSPOWER



Form 6

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

Clause 8 of Schedule 1, Resource Management Act 1991

To Mackenzie District Council (“the Council”)

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

This is a further submission in support of (or in opposition to) a number of submissions on a change proposed to the following existing plan) (“the proposal”):

Proposed Plan Change 20 (Strategic Chapters) to the Mackenzie District Plan (“Proposed Plan Change”).

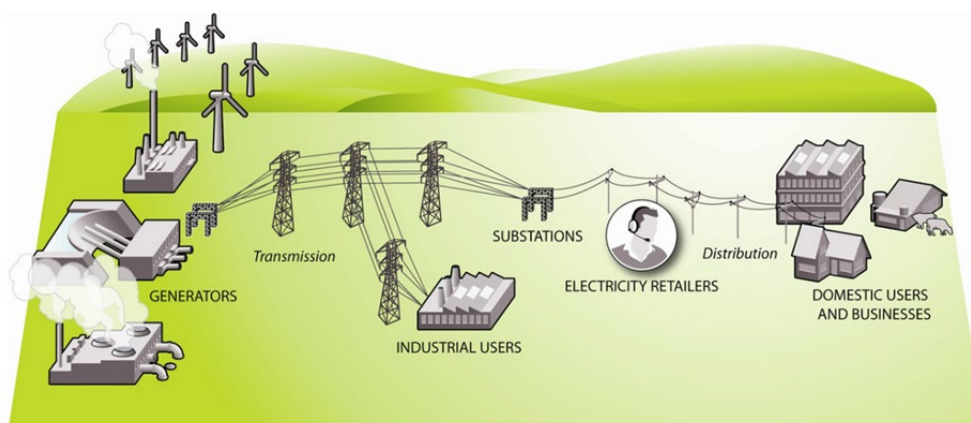
Transpower has an interest in the Proposed Plan Change that is greater than the interest the general public has, for reasons including the following:

- Transpower is the owner and operator of the National Grid. The National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 (“NPSET”) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”). The Proposed Plan Change must give effect to the NPSET. The NPSET confirms that the need to operate, maintain, develop and upgrade the National Grid is a matter of national significance. Transpower has a significant interest in ensuring that the Proposed Plan Change meets these statutory obligations.
- Transpower has an interest as a landowner and occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.

About Transpower

Transpower is the state-owned enterprise that plans, builds, maintains, owns and operates New Zealand’s high voltage electricity transmission network, known as the National Grid. The National Grid connects power stations, owned by electricity generating companies, directly to major industrial users and distribution companies feeding electricity to the local networks that, in turn, distribute electricity to homes and businesses. The role of Transpower is illustrated in Figure 1.

Figure 1: Role of Transpower in New Zealand’s Electricity Industry (Source: MBIE)



The National Grid stretches over the length and breadth of New Zealand from Kaikohe in the North Island to Tiwai Point in the South Island and comprises some 11,000 kilometres of transmission lines and cables and

more than 170 substations, supported by a telecommunications network of some 300 telecommunication sites that help link together the components that make up the National Grid.

Transpower's role and function is determined by the State-Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

It is important to note that Transpower's role is distinct from electricity generation, distribution or retail. Transpower provides the required infrastructure to transport electricity from the point of generation to local lines distribution companies, which supply electricity to everyday users. These users may be a considerable distance from the point of generation.

Transpower's Statement of Corporate Intent for 1 July 2022, states that:

“Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- as grid owner, to reliably and efficiently transport electricity from generators to distributors and large users; and

- as system operator, to operate a competitive electricity market and deliver a secure power system.”

In line with this role, Transpower needs to efficiently operate, maintain and develop the network to meet increasing demand and to seek security of supply, thereby contributing to New Zealand's economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

As the economy electrifies in pursuit of the most cost efficient and renewable sources, the base case in Transpower's 'Whakamana I Te Mauri Hiko' predicts that electricity demand is likely to increase around 55% by 2050. 'Whakamana I Te Mauri Hiko' suggests that meeting this projected demand will require significant and frequent investment in New Zealand's electricity generation portfolio over the coming 30 years, including new sources of resilient and reliable grid connected renewable generation. In addition, new connections and capacity increases will be required across the transmission system to support demand growth driven by the electrification of transport and process heat. Simply put, New Zealand's electricity transmission system is the infrastructure on which New Zealand's zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

The National Grid has operational requirements and engineering constraints that dictate and constrain where it is located and the way it is operated, maintained, upgraded and developed. Operational requirements are set out in legislation, rules and regulations that govern the National Grid, including the Electricity Act 1992, the Electricity Industry Participation Code, the New Zealand Electrical Code of Practice for Electrical Safe Distances ("NZECP 34:2001") and the Electricity (Hazard from Trees) Regulations 2003.

Transpower therefore has a significant interest in the development of an effective, workable and efficient District Plan where it may affect the National Grid, including in respect of existing assets, and the development of new assets, within Mackenzie District. It should be noted that Transpower cannot foresee all future development of the National Grid, particularly as it has an obligation to connect new electricity generation development to the National Grid, and such development can be located almost anywhere.

National Grid Assets in Mackenzie District

Transpower owns and operates a number of assets within, and traversing Mackenzie District. These assets supply electricity to Mackenzie District, as well as transmit electricity to the rest of New Zealand, and include around 320 kilometres of transmission lines, five substations, communications cables and associated equipment and include the following:

- Benmore – Haywards A (BEN-HAY-A) 350kV HVDC overhead transmission line on towers;
- Benmore – Islington A (BEN-ISL-A) 220kV overhead transmission line on towers;
- Benmore – Twizel A (BEN-TWZ-A) 220kV overhead transmission line on towers;
- Christchurch – Twizel A (CHH-TWZ-A) 220kV overhead transmission line on towers;
- Ohau A – Twizel A (OHA-TWZ-A) 220kV overhead transmission line on towers;
- Roxburgh – Twizel A (ROX-TWZ-A) 220kV overhead transmission line on towers;
- Tekapo A – Timaru A (TKA-TIM-A) 110kV overhead transmission line on poles (including pi poles);
- Tekapo B – Deviation A (TKB-DEV-A) 220kV overhead transmission line on towers;
- Twizel – Deviation A (TWZ-DEV-A) 220kV overhead transmission line on towers;
- Albury Substation;
- Ohau A Substation;
- Tekapo A Substation;
- Tekapo B Substation;
- Twizel Substation; and
- Two communications sites (Mt Mary and Tekapo A).

The map attached as **Appendix A** shows the location of National Grid assets in Mackenzie District.

Statutory Framework and the National Grid

The national significance of the National Grid is recognised, in an RMA context, by the NPSET and the NESETA. These documents apply only to the National Grid, and do not apply to local electricity distribution networks, nor lines owned and operated by electricity generators.

National Policy Statement on Electricity Transmission 2008

The NPSET was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and provides policy direction to ensure that decision makers under the RMA:

- recognise the benefits of the National Grid;
- manage the adverse effects on the environment of the National Grid;
- manage the adverse effects of third parties on the National Grid; and
- facilitate long term strategic planning for transmission assets.

The NPSET sets a clear directive on how to provide for National Grid resources (including future activities) when drafting planning documents and therefore councils have to work through how to make appropriate provision for the National Grid in their plans, in order to give effect to the NPSET.

A key reason for introducing the NPSET in 2008 was to resolve the inconsistencies that resulted from the variable provision for the National Grid in RMA plans and policy statements. This variance was despite the fact that the National Grid is largely the same across the country. In promoting the NPSET, central government accepted the importance of, and benefits of, a nationally consistent approach to decisions on transmission activities. The preamble of the NPSET highlights that the National Grid has particular physical characteristics and operational/security requirements that create challenges for its management under the RMA, and it is important there are consistent policy and regulatory approaches by local authorities.

The single Objective of the NPSET is:

“To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network.”*

The NPSET's Objective is implemented by fourteen policies. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. In a general sense these policies address the following:

- Policy 1: Recognising the benefits of the National Grid;
- Policy 2: Recognising and providing for the effective operation, maintenance, upgrading and development of the National Grid;
- Policies 3 to 5: Weighing the management of environmental effects against the operational constraints, site/route selection approach, and the requirements of existing assets;
- Policies 6 to 8: Reducing, minimising and avoiding adverse effects in differing contexts;
- Policy 9: Potential health effects;
- Policies 10 and 11: Managing adverse effects on the National Grid and providing for "buffer corridors";
- Policy 12: Mapping the National Grid; and
- Policies 13 and 14: Long-term development and planning for transmission assets.

Sections 55 and 75(3) of the RMA require the Council to give effect to the objectives and policies of the NPSET in the District Plan. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

Giving effect to the NPSET will ensure that:

- the National Grid is able to be safely, effectively and efficiently operated, maintained, upgraded and developed to provide a reliable, safe and secure supply of electricity to Gore and beyond; and
- the adverse effects of development in proximity to the National Grid are appropriately managed and are reduced, minimised or avoided depending on the context in which the development occurs.

Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The NESETA came into effect on 14 January 2010 and sets out a national regulatory framework for activities related to existing National Grid lines, including the operation, maintenance and upgrading of such lines. The NESETA specifies permitted electricity transmission activities (subject to standards) and sets out resource consent requirements where these activities do not meet the standards. The NESETA only applies to the Transpower's National Grid lines that existed on 14 January 2010 and does not apply to new transmission lines or new or existing substations. In the context of Plan Change 20, the NESETA has limited relevance, with the exception of being identified as a National Environmental Standard that is 'in force'.

Canterbury Regional Policy Statement 2013

Section 75(3) of the RMA also requires a Proposed Plan Change to give effect to a regional policy statement. The operative Canterbury Regional Policy Statement ("CRPS") (republished in July 2021) includes the following Policy 16.3.4 that is specific to the National Grid and must be given effect to:

"16.3.4 Reliable and resilient electricity transmission network within Canterbury

To encourage a reliable and resilient national electricity transmission network within Canterbury by:

- 1. having particular regard to the local, regional and national benefits when considering operation, maintenance, upgrade or development of the electricity transmission network;*
- 2. avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed;*
- 3. enabling the operational, maintenance, upgrade, and development of the electricity transmission network provided that, as a result of route, site and method selection, where;*

- a. *the adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable, remedied or mitigated; and*
- b. *other adverse effects on the environment are appropriately controlled.”*

Transpower’s further submission

Transpower understands that the Proposed Plan Change is part of a broader District Plan review process. It is noted that this review process will include a review of the network utility/infrastructure section of the District Plan, that in turn will encompass further provisions required to fully give effect to the NPSET. The relationship between Plan Change 20 and the future network utilities/infrastructure provisions is not entirely clear to Transpower, including whether there is an intended hierarchy in provisions, with Strategic Direction Objectives having an overarching role.

That said, this further submission is made on the basis that the need to operate, maintain, develop and upgrade the electricity transmission network is a matter of national significance that must be addressed at a strategic level in the District Plan in a manner that gives effect to the NPSET and the CRPS.

In this further submission, Transpower’s support of, or opposition to, a particular submission including the reason for Transpower’s support or opposition and the relief sought are detailed in the table attached as **Appendix B**. The general reasons for Transpower’s further submission are set out below. These reasons apply to each submission listed in **Appendix B** and are supplemented by specific reasons and relief in **Appendix B**.

General reasons in respect of submissions supported by Transpower

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

- give effect to the NPSET;
- give effect to the CRPS, and particularly Policy 16.3.4;
- are the most appropriate means of exercising the Council’s functions in respect of section 32 of the RMA; and
- achieve the sustainable management purpose of the RMA, including by enabling people and communities to provide for their social, economic and cultural well-being and for their health and safety.

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

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

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

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

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

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



Signature of person authorised to sign
on behalf of Transpower New Zealand Limited

Date: **3 October 2022**

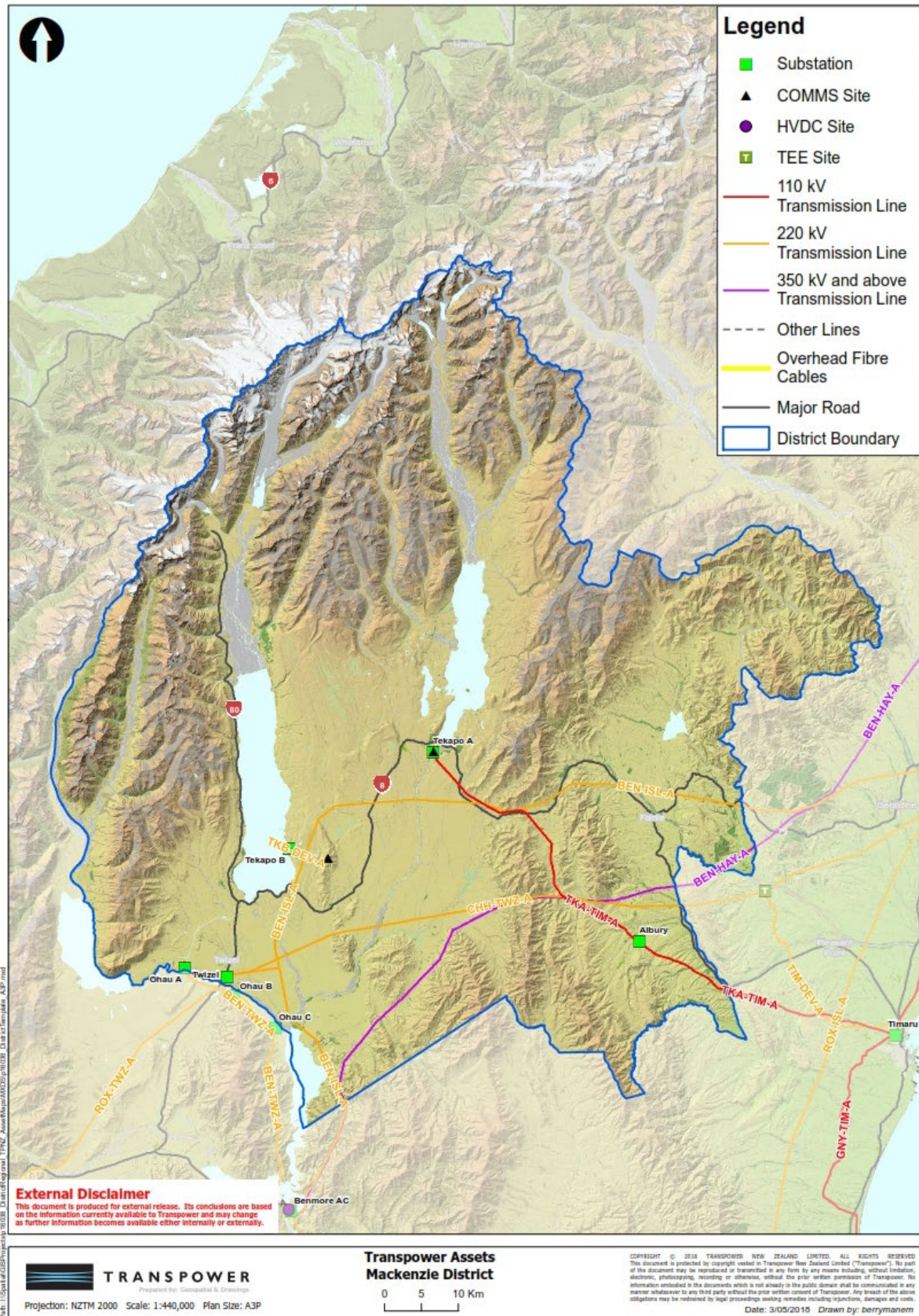
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Appendix A: National Grid Assets in Mackenzie District



Appendix B – Transpower New Zealand Limited: Further Submission on Submissions Made on Proposed Plan Change 20 (Strategic Changes) to the Mackenzie District Plan

The following table sets out the decisions sought by Transpower, including the reasons for Transpower’s support or opposition and the specific amendments to the provisions of the Proposed Plan change as a result. The Proposed Plan Change text is shown without underlining; the relief sought in primary submission is shown as black underline and ~~black strikethrough~~; and the amendments sought by Transpower are shown in red double underline and ~~red double strikethrough~~.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
NZ Pork				
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: UFD - Urban Form and Development Objective UFD-O1: Urban Form and Development	Seeks the inclusion of the following clause in Objective UFD-O1: <i>“The District’s townships and settlements grow and develop in a consolidated way that: ... <u>6. responds to the rural/urban interface to maintain primary production and avoid reverse sensitivity effect.”</u></i>	Support in part	Transpower supports the relief sought by NZ Pork to the extent that the relief recognised the potential for reverse sensitivity effects at the rural urban interface. Transpower is of the view that effects are not limited to reverse sensitivity effects, but urban growth can also result in direct adverse effects on existing, lawfully established activities. Transpower considers the new clause could be revised to reflect this.	Allow the submission subject to the following revisions to the clause sought in the primary submission: <i>“The District’s townships and settlements grow and develop in a consolidated way that: ... <u>6. responds to the rural/urban interface to ensure that the ability for existing lawfully established activities to continue to operation and develop is not compromised maintain primary production and avoid reverse sensitivity effect.”</u></i>
Heritage New Zealand Pouhere Taonga				
Part 2 – District-Wide Matters Section: Strategic Direction New Strategic Objective	The Strategic Direction chapter should identify the resource management issues, including matters of national and regional importance, that are of particular importance to the Mackenzie District.	Support in part	Transpower supports the submission made by Heritage New Zealand Pouhere Taonga and agrees that the Strategic Directions chapter should address matters of national and regional importance. Transpower considers this should include those matters in section 6 of the RMA; matters identified as nationally significant in national policy statements; and	Allow the submission and amend the plan change to ensure that all matters of national importance and all matters of national significance are addressed in Strategic Directions Objectives.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			matters identified as regionally significant in the CRPS.	
Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited				
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: ATC – A Thriving Community Objective ATC-O3: Infrastructure	Supports, and seeks the retention of Objective ATC-O3.	Support	Transpower supports the primary submission and similarly agrees that recognising such infrastructure in the Strategic Direction section is appropriate.	Subject to Transpower’s further submission elsewhere, allow the submission.
Royal Forest and Bird Protection Society of New Zealand				
Part 2 – District-Wide Matters Section: Strategic Direction Introduction	Seeks that the second sentence of the Strategic Direction Introduction be amended as follows: <i>“For the purposes of preparing, changing, interpreting, and implementing the District Plan, all other objectives and policies in all other chapters of this District Plan are to be read and achieved in a manner consistent with these Strategic Directions. There is no hierarchy between the stated Objectives. No one Strategic Objective has primacy over another strategic objective, and the Strategic Objectives should be read as a whole.</i> <u>For the purpose of plan implementation (including in the determination of resource consent application and notices of requirement):</u> <u>a. The strategic objectives in this chapter may provide guidance on what the related objectives and policies in other chapters of the Plan are seeking to achieve in relation to the Strategic Issues;</u> <u>b. The relevant objective and policies of the plan (including Strategic Objectives and</u>	Support	Transpower considers that it is critical that the Proposed Plan change clearly states the purpose of the Strategic Direction objectives so that there is no ambiguity in future RMA planning approval processes, including in respect of whether there is any hierarchy within the Proposed District Plan. Transpower’s view is that there should be no hierarchy between provisions, except where very explicit direction is given. Transpower considers that the relief sought in the primary submission provides greater clarity and direct, when compared to the notified text. On that basis, Transpower supports the submission.	Allow the submission.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<i><u>Strategic Policies in this Chapter) are to be considered together and no fixed hierarchy exists between them.”</u></i>			
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: NE - Natural Environment Objective NE-O1: Natural Environment	Seeks that Objective NE-O1 is amended as follows, including the addition of a further Objective: <i>“The values of the natural environment that make the District unique, contribute to its character, identity and wellbeing, and or have significant or outstanding intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i> <i>1. mahika kai resources;</i> <i>2. night sky darkness;</i> <i>3. outstanding natural features and landscapes;</i> <i>4. significant indigenous biodiversity; and</i> <i>5. water bodies and their margins”</i>	Support in part	Transpower supports the primary submission to the extent that the submission seeks to remove ambiguity and seeks to better align the Objective with the RMA and CRPS. Transpower also agrees that without the outcome of Plan Change 18 (Indigenous Biodiversity) and visibility of the District Plan provisions as a whole it is difficult to gauge the level of detail necessary in the Objective. Similarly, Transpower does not oppose the new Objective subject to the direction or outcomes given in the Objective being consistent with the provisions in the RMA, national policy statements and the CRPS.	Allow the submission to the extent that the Objective would benefit from removing ambiguity and more direct alignment with the RMA and CRPS.
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: NE - Natural Environment New Objective	Insert a new Objective as follows: <u>NE-O2</u> <u>Across the District:</u> <i>1. mahika kai resources are protected and enhanced;</i> <i>2. night sky darkness is protected, and enhanced;</i> <i>3. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity across the district and significant indigenous vegetation and habitats are protected;</i> <i>4. the natural character of freshwater bodies including wetlands is preserved or enhanced, or restored where degradation has occurred;</i>			

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><u>5. outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected;</u></p> <p><u>6. people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the western ranges, and within urban environments;</u></p> <p><u>7. land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater; and</u></p> <p><u>8. the mauri of ecosystems and indigenous biodiversity is safeguarded and freshwater is managed in a way that gives effect to “Te Mana o te Wai.”</u></p>			
Genesis Energy Limited				
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community Introduction</p>	<p>Seeks that the fourth paragraph of the introduction is amended as follows:</p> <p><i>“There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, as well as development of new infrastructure is important to the well-being of the community of Mackenzie, Canterbury and nationally. This includes the contribution that <u>existing and new</u> renewable electricity generation and</i></p>	Support	<p>Transpower generally supports the amendment sought in the primary submission because, as it relates to the National Grid, the contemplation of future infrastructure is consistent with the Objective of the NPSET that refers to:</p> <p><i>“... facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations ...”</i>.</p>	Allow the submission.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<i>transmission assets located in the District make to the nation.”</i>			
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: ATC – A Thriving Community Objective ATC-O4 Renewable Electricity	Seeks that Objective ATC-O4 be replaced as follows: <u>“Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u> <u>a) are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u> <u>b) are provided for, including their development, operation, maintenance and upgrade;</u> <u>c) are protected from reverse sensitivity effects; and</u> <u>d) provide for the current and future energy needs of the District’s communities and economy.”</u>	Support in part	Transpower does not oppose the inclusion of further detail in Objective ATC-O4 as proposed in the primary submission. However, Transpower seeks further refinements to the relief sought to better reflect the policy direction in CRPS policy 16.3.4 in respect of: <ul style="list-style-type: none"> - ‘enabling the operation, maintenance, upgrade and development of the National Grid; - ‘avoiding’ activities that may impact the National Grid (being direct effects, not just reverse sensitivity effects); and - Recognising the regional and national contribution of the National Grid. 	Allow the submission subject to the following further amendments: <u>“Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u> <u>a) are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u> <u>b) are enabled provided for, including their development, operation, maintenance and upgrade;</u> <u>c) are protected from adverse effects of other activities, including reverse sensitivity effects; and</u> <u>d) provide for the current and future energy needs of the District, region and nation’s communities and economy.”</u>
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: UFD - Urban Form and Development Objective UFD-O1: Urban Form and Development	Seeks the following amendment to Objective UFD-O1: <u>“The District’s townships and settlements grow and develop in a consolidated way that:</u> ... 4. <u>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</u> 5. <u>responds to the needs of the community, including diversity in housing and business opportunities-; <u>and</u></u> 6. <u>protects significant infrastructure and activities in the District from reverse sensitivity effects.”</u>	Support in part	Transpower generally supports the addition of a further clause in Objective UFD-O1 that address the effects of growth and development on significant infrastructure. However, Transpower notes that adverse effects are not limited to reverse sensitivity effects and seeks a further refinement to the relief in the primary submission to give effect to Policy 10 and 11 of the NPSET, and Policy 16.3.4 of the CRPS.	Allow the submission, subject to the following amendment: <u>“The District’s townships and settlements grow and develop in a consolidated way that:</u> ... 4. <u>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</u> 5. <u>responds to the needs of the community, including diversity in housing and business opportunities-; <u>and</u></u> 6. <u>protects significant infrastructure and activities in the District from adverse effects, including reverse sensitivity effects.”</u>

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Opuha Water Limited				
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: ATC – A Thriving Community Introduction	Seeks that the fourth paragraph of the introduction is amended as follows: <i>“There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, <u>be maintained and upgraded</u> as well as development of new infrastructure is important to the well-being of the community of <u>the Mackenzie District, the Canterbury Region</u> and nationally. This includes the contribution that renewable electricity generation and transmission assets located in the District make to the nation.”</i>	Support	Transpower supports the amendments to the Introduction sought in the primary submission on the basis that, insofar as the text relates to the National Grid, the amendments are consistent with, and give effect to, the NPSET.	Allow the submission.
Pukaki Tourism Holdings Limited Partnership and Pukaki Village Holdings Limited				
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: NE - Natural Environment Objective NE-01: Natural Environment	Seeks that Objective NE-01 is amended as follows: <i>“The values of the natural environment that make the District unique contribute to its character, identity and wellbeing, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with <u>The associated values are: ...”</u></i>	Support	Transpower supports the amendment sought in the primary submission on the basis that the revised wording provides greater certainty in terms of the values that are provided for in the Objective.	Allow the submission.
Meridian Energy Limited				
Part 2 – District-Wide Matters Section: Strategic Direction	Seeks that the fourth paragraph of the introduction is amended as follows: <i>“There is a range of locally, regionally and nationally important infrastructure located within the District. Infrastructure is necessary</i>	Support	Transpower generally supports the amendment sought in the primary submission because, as it relates to the National Grid, the contemplation of future infrastructure is	Allow the submission.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Chapter: ATC – A Thriving Community Introduction	<i>to support the functioning of the community, both within and beyond the District, but its establishment and operation can have adverse effects. While needing to appropriately manage its effects, the continued ability for this infrastructure to operate, as well as development of new infrastructure is important to the well-being of the community of Mackenzie, Canterbury and nationally. This includes the contribution that <u>existing and new renewable electricity generation and transmission assets located in the District make to the nation.</u></i>		consistent with the Objective of the NPSET that refers to: <i>“... facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations ...”</i> .	
Part 2 – District-Wide Matters Section: Strategic Direction Chapter: ATC – A Thriving Community Objective ATC-O4 Renewable Electricity	Seeks that Objective ATC-O4 be replaced as follows: <i>“<u>Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u></i> <i>a) <u>are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u></i> <i>b) <u>are provided for, including their development, operation, maintenance and upgrade;</u></i> <i>c) <u>are protected from reverse sensitivity effects; and</u></i> <i>d) <u>provide for the current and future energy needs of the District’s communities and economy.</u>”</i>	Support in part	Transpower does not oppose the inclusion of further detail in Objective ATC-O4 as proposed in the primary submission. However, Transpower seeks further refinements to the relief sought to better reflect the policy direction in CRPS policy 16.3.4 in respect of: - ‘enabling the operation, maintenance, upgrade and development of the National Grid; - ‘avoiding’ activities that may impact the National Grid (being direct effects, not just reverse sensitivity effects); and Recognising the regional and national contribution of the National Grid.	Allow the submission subject to the following further amendments: <i>“<u>Renewable electricity generation activities, including the nationally significant Waitaki Power Scheme, and the electricity transmission network:</u></i> <i>a) <u>are recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u></i> <i>b) <u>are enabled provided for, including their development, operation, maintenance and upgrade;</u></i> <i>c) <u>are protected from adverse effects of other activities, including reverse sensitivity effects; and</u></i> <i>d) <u>provide for the current and future energy needs of the District, region and nation’s communities and economy.”</u></i>
Part 2 – District-Wide Matters Section: Strategic Direction	Seeks the following amendment to Objective UFD-O1: <i>“<u>The District’s townships and settlements grow and develop in a consolidated way that:</u></i>	Support in part	Transpower generally supports the addition of a further clause in Objective UFD-O1 that address the effects of growth and development on significant infrastructure. However, Transpower notes that adverse	Allow the submission, subject to the following amendment: <i>“<u>The District’s townships and settlements grow and develop in a consolidated way that:</u></i>

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Chapter: UFD - Urban Form and Development Objective UFD-O1: Urban Form and Development	... 4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 5. <i>responds to the needs of the community, including diversity in housing and business opportunities; <u>and</u></i> 6. <i><u>protects significant infrastructure and associated activities in the District from reverse sensitivity effects.</u></i>		effects are not limited to reverse sensitivity effects and seeks a further refinement to the relief in the primary submission to give effect to Policy 10 and 11 of the NPSET, and Policy 16.3.4 of the CRPS.	... 4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 5. <i>responds to the needs of the community, including diversity in housing and business opportunities; <u>and</u></i> 6. <i><u>protects significant infrastructure and associated activities in the District from <u>adverse effects, including reverse sensitivity effects.</u></u></i>
Waka Kotahi NZ Transport Agency				
Part 1 – Introduction and General Provisions Section: How the District Plan Works Chapter: Cross Boundary Matters	The submission supports the approach proposed for cross boundary issues, and the recognition that Mackenzie District Council adjoins the boundary of several Councils (Westland, Waitaki, Waimate, Ashburton and Timaru) and is located within the Canterbury Region. The submission recognises that the state highways connect many road users through these districts and a consistent approach to consenting provides more certainty in the operation and maintenance of the network.	Support	Transpower supports the primary submission for similar reasons. The National Grid is located in most districts and all regions of New Zealand. As such the continuity and consistency of regulation is vital to the efficient and effective operation, maintenance, upgrading and development of the National Grid. This is recognised in the Preamble to the NPSET that states: <i>“The transmission network is an extensive and linear system which makes it important that there are consistent policy and regulatory approaches by local authorities.”</i>	Allow the submission and, in particular, retain clause (2) as follows: <i>“2. Ensuring, where appropriate, that there is an appropriate degree of consistency across and integration between this District Plan and the plans of adjoining territorial authorities, as well as the CRPS and regional plans. This will ensure that the region’s resources are managed in a coordinated and integrated manner; and ...”</i>
Part 1 – Introduction and General Provisions Section: Interpretation Chapter: Definitions	Supports the adoption of the definition of ‘infrastructure’ from the RMA	Support	Transpower also supports the adoption of the RMA definition of ‘infrastructure’ that includes <i>“facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person—</i>	Allow the submission.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p>(a) uses them in connection with the generation of electricity for the person's use; and</p> <p>(b) does not use them to generate any electricity for supply to any other person: ..."</p>	
Canterbury Regional Council				
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community</p> <p>ATC-O1: Live, work, play and visit</p>	<p>Seeks that clause (2) of Objective ATC-O1 is amended as follows:</p> <p><i>“Activities that are important to the community’s social, economic and cultural well-being, including appropriate economic development opportunities, are provided for, while ensuring adverse environmental effects are managed appropriately; and’, ...”</i></p> <p>Or alternatively seeks a new Strategic Objective as follows:</p> <p><i>“Avoid significant adverse effects on the environment and avoid, remedy or mitigate other adverse effects”.</i></p>	Support in part	<p>Transpower supports the primary submission to the extent that Transpower agrees that the District Plan should include objectives in respect of the management of effects on the environment (beyond those matters listed in Objective NE-O1). However, Transpower does not support the alternate relief proposed in the submission, being the avoidance of significant adverse effects, on the basis that neither the RMA, CRPS or the NPSET (insofar as this Objective relates to the National Grid) require all significant adverse effects to be avoided. In this regard, it is noted that the NPSET Preamble anticipates the National Grid having significant adverse effects as follows:</p> <p><i>“These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant.”</i></p>	Disallow the relief on the basis that the amended and replacement Objective are not necessary in the context of the matters addressed by the Objective, and because the approach to effects in the alternate new Objective is inappropriate and inconsistent with the RMA, NPSET and CRPS.
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community</p> <p>ATC-O3: Infrastructure</p>	<p>Seeks that Objective ACT-O3 is replaced with either of the following:</p> <p><i>“The importance of regionally significant infrastructure is recognised and provided for without major constraints from other activities, while managing its adverse effects.”</i></p> <p><i>“Regionally significant infrastructure is provided for without major constraints from other activities, while managing its adverse effects.”</i></p>	Support in part	<p>To the extent that Objective ACT-O3 applies to the National Grid, Transpower generally supports the relief sought in the primary submission to the extent that the proposed replacement Objectives seeks to ‘capture’ concepts that are embedded in CRPS provisions.</p> <p>Transpower seeks limited amendments to the proposed replacement Objectives to better reflect Policy 16.3.4 that relates to the National</p>	<p>Subject to the relief sought by Transpower in relation to other submissions, allow the submission subject to the following further refinements:</p> <p><i>“The importance of regionally significant infrastructure is recognised and provided for without major constraints from other activities, while <u>controlling or managing its adverse effects.</u>”</i></p> <p><i>“Regionally significant infrastructure is provided for without major constraints from</i></p>

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p>Grid (although it is noted that this may be better addressed in Objective ATC-O4).</p> <p>Transpower acknowledges that confining the Objective to regionally significant infrastructure does not have any implications for Transpower, because the National Grid is nationally (and therefore regionally) significant.</p> <p>Provide greater direction when compared to the Objective as notified.</p> <p>Transpower supports the Objective referencing the 'management' of adverse effects of regionally significant infrastructure on the basis that this amendment suggests that implementing provisions should set apart the management of the effects of infrastructure from the management of the effects of activities more generally. Such an approach is consistent with Policy 16.3.4 of the CRPS and the NPSET, however, it is noted that the effects addressed by this Objective are directed to be 'controlled' by Policy 16.3.4.</p>	<p><i>other activities, while <u>controlling or managing its adverse effects.</u></i></p>
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community</p> <p>ATC-O4: Renewable Electricity</p>	<p>Seeks that either Objective ATC-O4 is deleted or alternatively replaced with the following:</p> <p><i><u>“Important renewable electricity generation and electricity transmission assets are provided for without major constraints from other activities, while managing their adverse effects.”</u></i></p>	Oppose	<p>Transpower opposes the deletion of Objective ATC-O4 and considers that it is more appropriate to set electricity generation and transmission apart from other regionally significant infrastructure in a manner that is consistent with their distinct treatment in the CRPS.</p> <p>In terms of the replacement Objective, while the primary submission acknowledges Policy 16.3.4 of the CPRS, Transpower is of the view that the Objective does not correctly reflect this policies or the direction given in the CRPS including as follows:</p>	<p>Disallow the submission insofar as it seeks the deletion of the Objective. Should the submission be allowed in respect of the replacement Objective, allow the submission subject to the amendments set out below that further refine the relief to better give effect to Policy 16.3.4 of the CRPS:</p> <p><u>“ATC-O4: Renewable Electricity and Electricity Transmission</u></p> <p><u>The operation, maintenance, upgrade and development of Important renewable electricity generation and electricity transmission assets is enabled while are provided for without major constraints from</u></p>

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
			<p>- CRPS policy 16.3.4 directs that the operation, maintenance, upgrade and development of the National Grid is ‘enabled’ as opposed to ‘provided for’;</p> <p>- CRPS Objective 16.2.1 and Policy 16.3.4 require that activities that limit the ability of the National Grid to be operate, maintained, upgraded or developed be ‘avoided’ as opposed to having ‘major constraints’;</p> <p>- adverse effects (other than on significant resources) are directed to be ‘controlled’.</p>	<p><u>other activities are avoided, while managing and their adverse effects are controlled.</u>”</p>
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community</p> <p>New Objective</p>	<p>Seeks the inclusion of the following new Objective:</p> <p><u>“Natural hazard risks are addressed so that:</u></p> <p><u>1. areas subject to natural hazard risk are identified;</u></p> <p><u>2. development is avoided in areas where the risks of natural hazards to people, property and critical infrastructure are assessed as being unacceptable; and</u></p> <p><u>3. for other areas, natural hazard risks are appropriately mitigated.”</u></p>	Support in part	<p>Transpower does not oppose the inclusion of a new Objective in respect of natural hazard risks, while acknowledging that the Council may prefer to address natural hazards in subsequent plan changes that form part of the District Plan review.</p> <p>That said, Transpower is concerned that the new Objective promoted in the primary submission is blunt in its direction to avoid development and fails to reflect the more nuanced approach in Policies 11.3.1 and 11.3.4 of the CRPS, particularly in respect of critical infrastructure.</p>	<p>Allow the submission subject to the amendments set out below that further refine the relief to better give effect to Policy 11.3.1 and 11.3.4 of the CRPS:</p> <p><u>“Natural hazard risks are addressed so that:</u></p> <p><u>1. areas subject to natural hazard risk are identified;</u></p> <p><u>2. development is avoided in areas where the risks of natural hazards to people, and property and critical infrastructure are assessed as being unacceptable;</u></p> <p><u>x. new critical infrastructure is located outside of high hazard areas unless there is no practicable alternative; and</u></p> <p><u>3. for other areas, natural hazard risks are appropriately mitigated.”</u></p>
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: NE - Natural Environment</p> <p>Objective NE-01: Natural Environment</p>	<p>Seeks that Objective NE-01 be amended as follows:</p> <p><u>“NHE-01 Natural and Historic Environment</u></p> <p><u>The important values of the natural and historic environment, including those that make the District unique, contribute to its character, identity and wellbeing, and have</u></p>	Support in part	<p>Transpower supports the statement in the primary submission as follows:</p> <p><u>“...While protection is often sought as the primary management method for these resources within the CRPS, in many cases, a level of use and development is allowed for where it is deemed appropriate, and adverse effects can be avoided or mitigated.”</u></p>	<p>Allow the submission to the extent that the submission:</p> <ul style="list-style-type: none"> - inserts “important”; - inserts “including those”; and - deletes “and have significant intrinsic values”.

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><i>significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i></p> <ol style="list-style-type: none"> 1. mahika kai resources; 2. night sky darkness; 3. outstanding natural features and landscapes; 4. significant indigenous biodiversity; and 5. water bodies and their margins; 6. historic heritage.” 		Therefore, Transpower generally supports the amendments proposed to better reflect the position taken in the primary submission and, insofar as the Objective relates to the National Grid, Transpower considers these amendments give effect to the approach to effects in the NPSET.	
Nova Energy Limited				
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community</p> <p>ATC-O3: Infrastructure</p>	<p>Seeks that Objective ATC-O3 be amended as follows:</p> <p><i>“The importance of <u>existing and appropriate future</u> infrastructure to the District and beyond is recognised and provided for.”</i></p>	Support in part	<p>Transpower generally supports the amendment sought in the primary submission because, insofar as the Objective relates to the National Grid, the contemplation of future infrastructure is consistent with the Objective of the NPSET that refers to:</p> <p><i>“... facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations ...”</i>.</p> <p>Transpower does not consider that the use of “appropriate” in the Objective is necessary or helpful on the basis that what may or may not be appropriate as an outcome is not clear.</p>	<p>Allow the submission to the extent that it introduces the concept of future infrastructure and subject to following further amendment:</p> <p><i>“The importance of <u>existing and appropriate future</u> infrastructure to the District and beyond is recognised and provided for.”</i></p>
<p>Part 2 – District-Wide Matters</p> <p>Section: Strategic Direction</p> <p>Chapter: ATC – A Thriving Community</p> <p>ATC-O4: Renewable Electricity</p>	<p>Seeks that Objective ATC-O4 be amended as follows:</p> <p><i>“The local, regional and national benefits of the District’s <u>existing and appropriate future renewable electricity generation and electricity transmission assets</u> are recognised and their</i></p>	Support in part	Subject to the relief sought by Transpower in respect of other submissions, Transpower generally supports the amendment sought in the primary submission because, insofar as the Objective relates to the National Grid, the contemplation of future infrastructure is consistent with the Objective of the NPSET that refers to:	Subject to the relief sought by Transpower in relation to other submissions, allow the submission to the extent that it introduces the concept of future infrastructure and subject to following further amendment:

Provision	Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><i>development, operation, maintenance and upgrade provided for."</i></p>		<p><i>"... facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations ..."</i>.</p> <p>Transpower does not consider that the use of "appropriate" in the Objective is necessary or helpful on the basis that what may or may not be appropriate as an outcome is not clear.</p>	<p><i>electricity transmission assets are recognised and their development, operation, maintenance and upgrade provided for."</i></p>