

## Jimmy Sygrove

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**From:** letstalk@mackenzie.govt.nz <notifications@engagementhq.com>  
**Sent:** Friday, 26 January 2024 3:55 pm  
**To:** jsygrove@rationale.co.nz; Charmaine Duffell  
**Subject:** Anonymous User completed Submission Form - Plan Change 26: Renewable Electricity Generation and Infrastructure

**CAUTION:** This email originated from outside Mackenzie District Council. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Anonymous User just submitted the survey Submission Form - Plan Change 26: Renewable Electricity Generation and Infrastructure with the responses below.

**Full Name**

Fabia Fox

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**Contact person (if different from above)**

Fabia Fox

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**Email address**

fabia.fox@alpineenergy.co.nz

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**Postal Address**

24 Elginshire Street

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**Phone number**

0274693702

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**Do you believe you could gain an advantage in trade competition through this submission?**

No

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**Are you directly affected by an effect or the subject matter that adversely affects the environment and does not relate to trade competition of the effects of trade competition?**

Yes

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**The specific provisions of the proposal that my submission relates to are as follows:**

Definition of Electricity Distribution Corridor INF-O3 – Adverse Effects on Infrastructure INF-P1 – Benefits of Infrastructure INF-P5 – Infrastructure in Sensitive or Significant Areas INF-P10 – Managing Activities in the Electricity Distribution Corridor INF-R2 – Upgrading Above Ground Infrastructure INF-R8 – New Lines and Associated Support Structures Including Towers and Poles INF-R28-31 - Activities in the Electricity Distribution Corridor RG-01 – General Output

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**I support/oppose these provisions:  
(include whether you support or oppose in full or in part)**

Definition of Electricity Distribution Corridor - Support INF-O3 – Support in part INF-P1 – Support INF-P5 – Support INF-P10 – Support INF-R8 – Support in part INF-R28-31 - Support REG-01 – Support

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**The reason(s) for my submission are:  
(state in summary your reasons, and whether you seek any amendments)**

Please see attached the supporting document for the full submission details including reasons and amendments sought

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**I seek the following decision from the Mackenzie District Council: (give precise details)**

Please see attached the supporting document for the full submission details including decisions sought

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**Do you wish to be heard in support of your submission?**

I do

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**If others make a similar submission would you be prepared to consider presenting a joint case with them at any hearing?**

I would not

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**If you have any additional supporting information as part of this submission please attach it here.**

[https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/29040581162e559bfdef4e809f6598dc7bebbffe/original/1706237661/331ff3db42e6ed3f940b9e543f002a85\\_Alpine\\_Energy\\_Submission\\_to\\_Mackenzie\\_District\\_Plan\\_Review\\_Plan\\_Change\\_26.docx?1706237661](https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/29040581162e559bfdef4e809f6598dc7bebbffe/original/1706237661/331ff3db42e6ed3f940b9e543f002a85_Alpine_Energy_Submission_to_Mackenzie_District_Plan_Review_Plan_Change_26.docx?1706237661)

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# Alpine Energy Limited Submission

## Mackenzie District Plan Review Stage Three

### Plan Change 26

*Note: this document support the submission made to Plan Change 26 by Alpine Energy Limited through the online submission form.*

#### General

##### Definition of Electricity Distribution Corridor

Alpine Energy Limited supports the inclusion of this definition.

**Reason:** This definition aligns with other recently reviewed District Plans and has been tested for accuracy and appropriateness through these processes.

**Decision Sought:** Retain definition as proposed.

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#### Infrastructure

##### INF-O3 – Adverse Effects on Infrastructure

Alpine Energy Limited supports this objective in part.

**Reason:** As a Lifeline Utility, Alpine Energy Limited supports the Plan's objective that 'efficient operation maintenance, upgrading and development of regionally significant infrastructure is not constrained or compromised by other activities.' We seek an amendment to this objective as reflected below in red.

'The efficient operation maintenance, upgrading and development of regionally significant infrastructure **and lifeline utility infrastructure** is not constrained or compromised by other activities.'

This aligns with INF-P5 and INF-P7 which recognises lifeline utility infrastructure alongside regionally significant infrastructure.

**Decision Sought:** Amend INF-O3 as below:

'The efficient operation maintenance, upgrading and development of regionally significant infrastructure **and lifeline utility infrastructure** is not constrained or compromised by other activities.'

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##### INF-P1 – Benefits of Infrastructure

Alpine Energy Limited supports this objective.

**Reason:** This policy enables Alpine Energy Limited to plan, and operate, maintain, repair, upgrade and develop the electricity distribution network in an effective, safe and affordable way to support our communities, while mitigating any adverse effects caused by the infrastructure and activities associated with it.

**Decision Sought:** Retain policy as proposed.

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## **INF-P5 – Infrastructure in Sensitive or Significant Areas**

Alpine Energy Limited supports this policy.

**Reason:** Alpine Energy Limited supports the recognition of the benefits provided by lifeline utility infrastructure and look forward to working with Mackenzie District Council to demonstrate our site, route and method selection, design measures and management methods will avoid as far as practicable significant adverse effects on sensitive and/or significant areas.

We note that Plan Change 18 as notified introduced rules that would affect the vegetation management operations of Alpine Energy Limited as follows:

Indigenous vegetation clearance is permitted if it is within 2m of, and for the purpose of the maintenance of repair of farm infrastructure such as fence lines, vehicle tracks, stockyards etc.

- Indigenous vegetation clearance is permitted within the Farm Base Area
- Indigenous vegetation clearance within an area of improved pasture is a permitted activity provided the clearance is not within the following:
- Within an area of significant indigenous vegetation or significant habitat of indigenous fauna.
- Above 900m in altitude.
- Within 75m of a lake, 20m of the bank of a river, or 50m of any wetland.

Alpine Energy Limited is aware that Plan Change 18 is subject to Environment Court appeals, which have been resolved through mediation and the mediated outcomes have been addressed by draft consent documentation that has been filed with the Environment Court. However, Alpine Energy Limited understands the finalised Consent Orders have not been released by the Environment Court at this time.

Following the issue of the Consent Orders, Council will be required to amend the notified version of Plan Change 18 to reflect the mediated outcome. Alpine Energy Limited expects that some alignment with other District Plan chapters, including those subject to the plan changes currently notified, will be required. Alpine Energy Limited expects that Council will attend to this as part of its final “mop-up” stage of the District Plan Review.

Alpine Energy Limited’s submission on Plan Change 26 is therefore made without prejudice to any submission that it may make in relation to any future plan change(s) promulgated to align provisions in chapters of the Mackenzie District Plan that have already been reviewed and subject to stand alone plan changes with the updated Plan Change 18 provisions as directed by the Consent Orders.

**Decision Sought:** Retain policy as proposed.

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## INF-P10 – Managing Activities in the Electricity Distribution Corridor

Alpine Energy Limited supports this policy.

**Reason:** This policy aligns with other recently reviewed District Plans in Canterbury and across the motu. This policy will support the higher order objectives within the Plan, particularly INF-O3.

Encroachment on existing and future significant electricity distribution line corridors has the potential to add risk to electricity security of supply and reliability. The 33kV lines proposed to be covered by this policy and accompanying rules, are critical to the supply of electricity to Twizel, Tekapo, Fairlie and Aoraki/Mount Cook communities. If these lines are compromised, it is difficult to provide an alternative electricity supply to customers quickly. The proposed rules will help minimise the risk to critical infrastructure and enable Alpine Energy to continue to provide safe and reliable electricity within the Mackenzie District.

The inclusion of the National Policy Statement on Renewable Electricity Generation (NPS-REG) in this Plan Change recognises the importance of future renewable electricity infrastructure within the Mackenzie District. Our 33kV distribution lines will play an essential role in connecting new energy resources to local and national networks. This policy will future-proof the Plan for the evolving energy system. Considering the implementation of the NPS-REG, we submit that ensuring the protection of significant electricity distribution infrastructure is as critical as protecting the National Grid infrastructure.

**Decision Sought:** Retain policy as proposed.

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## INF-R2 – Upgrading Above Ground Infrastructure

Alpine Energy Limited supports these rules.

**Reason:** We support the proposed rules for the realignment, reconfiguration, relocation, and replacement of above ground infrastructure. These rules enable cost effective management, including the maintenance and upgrading of the overhead lines portion of the network.

We note that, while more aesthetically pleasing, the requirement to underground lines imposes considerable additional cost on the operation, maintenance, and development of the electricity distribution network. This cost is ultimately borne by the community through electricity lines charges or customers through connection charges. We urge Council to consider this in relation to any potential amendments imposing further requirements to underground existing lines to these and future plan changes.

**Decision Sought:** Retain rules as proposed.

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## INF-R8 – New Lines and Associated Support Structures Including Towers and Poles

Alpine Energy Limited supports in part.

**Reason:** We are seeking an amendment to this rule to permit the installation of new overhead lines and structures in Rural Lifestyle and Industrial zones.

A requirement to underground all new lines and extensions of more than three structures in these zones could add significant cost to customers seeking to connect to the electricity distribution network, and to all Mackenzie District electricity consumers through the

increased cost to underground significant parts of our expanding network across a growing District.

The undergrounding of new lines in Rural Lifestyle and Industrial zones is out of step with other Canterbury District Plans.

We acknowledge the role of objectives and policies requiring further compliance for new lines within ONL and ONF overlays. We look forward to working with Mackenzie District Council to avoid and mitigate any adverse effects on ONL and ONF from the essential distribution infrastructure required to support district wide development, and to achieve objectives including REG-O1 – to maintain or increase output from renewable electricity generation in the District.

**Decision Sought:** Alpine Energy Limited seeks an amendment to INF-R8:1 to remove Rural Lifestyle and Industrial Zones from the rule as indicated below:

1. Where located within a Residential, ~~Rural Lifestyle~~, Open Space, Commercial and Mixed Use, ~~Industrial~~ or Pukaki Village Zone:
    - a. Any new lines must be located underground; or
    - b. Any extension to an existing overhead line must involve no more than three additional support structures.
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#### **INF-R28, INF-R29, INF-R30, INF-R31 – Activities in the Electricity Distribution Corridor**

Alpine Energy Limited supports these rules.

**Reason:** These rules align with other recently reviewed District Plans in Canterbury and across the motu. These rules will support the higher order objectives within the Plan, particularly INF-O3.

Encroachment on existing and future significant electricity distribution line corridors has the potential to add risk to electricity security of supply and reliability. The 33kV lines covered by INF-P10 and these accompanying rules, are critical to the supply of electricity to Twizel, Tekapo, Fairlie and Aoraki/Mount Cook communities. If these lines are compromised, they are difficult to replace with an alternative electricity supply quickly. The proposed rules will help minimise the risk to critical infrastructure and enable Alpine Energy to continue to provide safe and reliable electricity within the Mackenzie District.

The inclusion of the National Policy Statement on Renewable Electricity Generation (NPS-REG) in Plan Change 26 recognises the importance of future renewable electricity infrastructure within the Mackenzie District. Our 33kV distribution lines will play an essential role in connecting these energy resources to local and national networks. This policy will future-proof the Plan for the evolving energy system. Considering the implementation of the NPS-REG, we submit that ensuring the protection of significant electricity distribution infrastructure is as critical as protecting the National Grid infrastructure.

**Decision Sought:** Retail rules as proposed.

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## Renewable Electricity Generation

### REG-01 - General Output

Aline Energy Limited supports this objective.

**Reason:** Alpine Energy Limited supports the objective to increase renewable electricity generation within the Mackenzie District and look forward to working with Council and other key stakeholders to support the distribution of increased renewable electricity to local communities.

We urge Council to consider the importance of electricity distribution infrastructure to achieving the higher order outcomes sought by the NPS-REG when making decisions relating to policies and rules for electricity distribution infrastructure.

**Decision Sought:** Retain objective as proposed.