

31 Gilberthorpes Road Islington 8042 PO Box 21-154, Christchurch 8140 New Zealand P 64 3 590 7600 www.transpower.co.nz

25 November 2022

Mackenzie District Plan Review Hearings Panel Mackenzie District Council PO Box 52 Main Street FAIRLIE 7949

Attention: Charmaine Duffell, Admin Support Officer – District Plan

Mackenzie District Plan, Proposed Plan Change 20 Hearing – Further Submission: Transpower New Zealand Limited

Transpower New Zealand Limited ("Transpower") writes in relation to the hearing of submissions on Plan Change 20, commencing on 29 November 2022.

There are a limited number of submission points of relevance to Transpower that are being considered as part of Hearing 2 and, where relevant, Transpower generally agrees with the recommendations given in the Section 42A Report for this topic. On that basis, Transpower has not requested to be heard or filed evidence for Hearing 2. That said, Transpower is available to respond to any questions the Hearings Panel may have.

For completeness Transpower records its position in respect of the relevant matters in the table below.

Primary Submission	Transpower's Further Submission	Section 42A Report Recommendation	Transpower's Position
NZ Pork Seeks the inclusion of the following a new clause relating to reverse sensitivity in Objective UFD-O1.	Allow the submission subject to amendments to the proposed clause.	Considers that protection from reverse sensitivity should not explicitly be included in the Strategic Direction objectives and is more appropriate to include in other chapters in the District Plan.	Agrees with the Section 42A Report recommendation that reference to reverse sensitivity is not necessary.
Heritage New Zealand Pouhere Taonga 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.	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.	Does not consider an additional Objective relating to historic heritage is necessary.	Agrees with the Section 42A Report recommendation.



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Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited Seeks the retention of Objective ATC-O3.	Allow the submission	Recommends that the Objective be retained as notified.	The Section 42A Report recommendation is consistent with Transpower's further submission.
Royal Forest and Bird Protection Society of New Zealand Seeks that the Strategic Directions introduction be amended by replacing the paragraphs that sets out the role of the Strategic Directions Chapter.	Allow the submission	Recommends amendments to the introductory text to clarify the role of the Strategic Directions provisions.	The recommended amendments provide greater clarity and are consistent with the outcome sought in Transpower's further submission.
Royal Forest and Bird Protection Society of New Zealand Seeks that Objective NE- O1 is amended and a new Objective is included.	Allow the submission to the extent that the Objective would benefit from removing ambiguity and more direct alignment with the RMA and CRPS.	Recommends amendments to Objective NE-O1	The recommended amendments to Objective NE-O1 are consistent with the outcome sought in Transpower's further submission.
Genesis Energy Limited Seeks that the introduction to Chapter: ATC – A Thriving Community be amended to refer to existing and new renewable electricity generation.	Allow the submission	Recommends a number of amendments to the introduction text.	The recommended amendments to the Introduction are consistent with the outcome sought in Transpower's further submission.
Genesis Energy Limited Seeks that Objective ATC-O4 be replaced with a new Objective.	Allow the submission subject to further amendments to the wording of the proposed Objective.	Recommends that Objective ATC-O4 be retained as notified.	If the notified version is retained, the detailed amendments in Transpower's further submission are unnecessary.
Genesis Energy Limited Seeks the inclusion of the following a new clause relating to reverse sensitivity in Objective UFD-O1.	Allow the submission subject to amendments to the proposed clause.	Considers that protection from reverse sensitivity should not explicitly be included in the Strategic Direction objectives and is more appropriate to include in other chapters in the District Plan.	Agrees with the Section 42A Report recommendation that reference to reverse sensitivity is not necessary.



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Primary Submission	Transpower's Further	Section 42A Report	Transpower's Position
	Submission	Recommendation	
Opuha Water Limited Seeks that the introduction to Chapter: ATC – A Thriving Community be amended to refer to infrastructure being maintained and upgraded	Allow the submission	Recommends a number of amendments to the introduction text.	The recommended amendments to the Introduction are consistent with the outcome sought in Transpower's further submission.
Pukaki Tourism Holdings Limited Partnership and Pukaki Village Holdings Limited Seeks that Objective NE- O1 is amended to that the list of values in not inclusive.	Allow the submission.	Recommends amendments to Objective NE-O1.	The recommended amendments to Objective NE-O1 are consistent with the outcome sought in Transpower's further submission.
Meridian Energy Limited Seeks that the introduction to Chapter: ATC – A Thriving Community be amended to refer to existing and new renewable electricity generation.	Allow the submission	Recommends a number of amendments to the introduction text.	The recommended amendments to the Introduction are consistent with the outcome sought in Transpower's further submission.
Meridian Energy Limited Seeks that Objective ATC-O4 be replaced with a new Objective.	Allow the submission subject to further amendments to the wording of the proposed Objective.	Recommends that Objective ATC-O4 be retained as notified.	
Meridian Energy Limited Seeks the inclusion of the following a new clause relating to reverse sensitivity in Objective UFD-O1.	Allow the submission subject to amendments to the proposed clause.	Considers that protection from reverse sensitivity should not explicitly be included in the Strategic Direction objectives and is more appropriate to include in other chapters in the District Plan.	Agrees with the Section 42A Report recommendation that reference to reverse sensitivity is not necessary.
Waka Kotahi NZ Transport Agency Supports the approach proposed for cross boundary issues	Allow the submission.	Recommends that the direction regarding cross boundary matters be retained as notified.	Agrees with the Section 42A Report recommendation.
Waka Kotahi NZ Transport Agency Supports the inclusion of the definition of infrastructure from the RMA.	Allow the submission	Recommends that the definition of 'infrastructure' be retained.	Agrees with the Section 42A Report recommendation.

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Canterbury Regional Council Seeks that clause (2) of Objective ATC-O1 be amended to include reference to how effects are managed or, alternatively, include a new Objective.	Disallow the submission because the amendments not necessary in the context of the matters addressed by the Objective.	Recommends that the submission be rejected because the amendments largely repeats s5(2)(c) of the RMA and are not necessary.	Agrees with the Section 42A Report recommendation.
Canterbury Regional Council Seeks that Objective ACT-O3 is replaced one of two possible new objective.	Allow the submission subject to further amendments to the new objectives.	Recommends that Objective ACT-O3 is retained as notified.	Agrees with the Section 42A Report recommendation.
Canterbury Regional Council Seeks that Objective ATC-O4 is deleted or, alternatively, replaced.	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 further amendments.	Recommends that Objective ATC-O4 be retained as notified.	If the notified version is retained, the detailed amendments in Transpower's further submission are unnecessary.
Canterbury Regional Council Seeks the inclusion of a new objective relating to natural hazards in ATC-A Thriving Community.	Allow the submission subject to further amendments that refine the relief to better give effect to Policy 11.3.1 and 11.3.4 of the CRPS	Recommends amendment to Objective ATC-O5 to refer to natural hazards.	The Objective, as recommended for amendment, is consistent with the relief sought in Transpower's further submission.
Canterbury Regional Council Seeks that Objective NE- O1 is amended.	Allow the submission in respect of some of the amendments proposed.	Recommends amendments to Objective NE-O1.	The recommended amendments to Objective NE-O1 are consistent with the outcome sought in Transpower's further submission.
Nova Energy Limited Seeks that Objective ATC-O3 be amended to refer to existing and future infrastructure.	Allow the submission subject to the deletion of "appropriate".	Recommends that Objective ATC-O3 be retained as notified.	Agrees with the Section 42A Report recommendation.
Nova Energy Limited Seeks that Objective ATC-O4 be amended to refer to existing and future infrastructure.	Allow the submission subject to the deletion of "appropriate".	Recommends that Objective ATC-O4 be retained as notified.	If the notified version is retained, the detailed amendment in Transpower's further



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Primary Submission	Transpower's Further Submission	Section 42A Report Recommendation	Transpower's Position
			submission is unnecessary.

Transpower requests that this letter be tabled at the Plan Change 20 hearing in order to confirm its position in relation to its submission points and the Section 42A Report recommendations.

Should the hearings panel have any questions or require clarification of any matter, please contact Ainsley McLeod, Transpower's planning consultant on +64 27 215 0600 or <u>ainsley@amconsulting.co.nz</u>.

Yours sincerely Transpower New Zealand Limited