

Further Submission by Transpower New Zealand Limited

Proposed Plan Changes 23, 26 and 27 to the Mackenzie District Plan

1 March 2024

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, and in opposition to, submissions on: Proposed Plan Changes 23, 26 and 27 (“Proposed Plan Changes”) to the Mackenzie District Plan (“District Plan”).

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

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

Transpower’s further submissions

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

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

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

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

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

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

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

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

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

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



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

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Appendix A – Transpower New Zealand Limited: Further Submission on Submissions Made on Proposed Plan Changes 23, 26 and 27 to the Mackenzie District Plan

The following table sets out the decisions sought by Transpower in respect of submissions made on the Proposed Plan Changes, including the reasons for Transpower's support or opposition in respect of the original submission. The Proposed Plan Change text is shown without underlining; the relief sought in primary submission is shown as red underlined and ~~red strikethrough~~.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
PLAN CHANGE 23 – GENERAL RURAL ZONE, NATURAL FEATURES AND LANDSCAPES, NATURAL CHARACTER				
New Zealand Transport Agency (Submission number PC23.15)				
PC23.15 15.02	<p>Interpretation Definitions Sensitive Activity</p> <p>Supports the inclusion of the activities identified in the proposed condition. However, it is considered that it should also include the following:</p> <ul style="list-style-type: none"> . Hospitals, healthcare facilities and any elderly persons housing, and . Marae and places of worship <p>The above activities are subject to adverse effects from noise and they should be included in the definition to ensure any provisions related to address such effects.</p> <p>Amend the definition as follows:</p> <p><i>"Means any:</i></p> <p>...</p> <p><i>e. <u>Hospitals, healthcare facilities and any elderly persons housing, and</u></i></p> <p><i>f. <u>Marae and places of worship.</u>"</i></p>	Support	Transpower supports the submission on the basis that the relief sought is generally consistent with the definition of 'sensitive activities' in the NPSET.	Allow the submission.
New Zealand Pork (Submission number PC23.26)				
PC23.26 26.06	<p>Interpretation Definitions Sensitive Activity</p>	Support in part	Transpower does not oppose the relief sought but is concerned that, insofar as the definition is necessary to give effect to Policy 11 of the NPSET,	Allow the submission to the extent that any amendment is

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	Oppose the narrow definition of sensitive activity which does not cover other activities that are equally sensitive to the effects of rural production and could give rise to reverse sensitivity effects. Amend the definition to cover other activities that are equally sensitive to the effects of rural production. E.g., Home business, Rural tourism activity, Residential visitor accommodation, Conservation activity, Camping grounds, Conference facilities, Healthcare facilities.		any amendment to the definition is consistent with the definition of 'sensitive activities' in the NPSET.	consistent with the definition of 'sensitive activities' in the NPSET.
PC23.26 26.12	General Rural Zone Policies Policy GRUZ-P3 Support policy to avoid reverse sensitivity, but activities giving rise to reverse sensitivity effects extend beyond residential and activities, and the term 'non-farm development' is vague. Suggest that the policy instead references sensitive activities, which is defined in the plan. Amend as follows: <i>"Avoid reverse sensitivity effects of non-farm development and residential activity <ins>sensitive activities</ins> on lawfully established primary production activities, activities that have a direct relationship with or are dependent on primary production, existing renewable electricity generation activities and the Tekapo Military Training Area."</i>	Oppose	Subject to the relief sought in Transpower's primary submission, Transpower does not support the submission because the relief sought inappropriately narrows the Policy to only sensitive activities whereas (consistent with Policy 10 of the NPSET) activities that do not fall within the definition of a sensitive activity may still give rise to reverse sensitivity effects on the operation, maintenance, upgrade and development of the National Grid.	Disallow the submission.
PLAN CHANGE 26: RENEWABLE ELECTRICITY GENERATION AND INFRASTRUCTURE				
Chorus New Zealand Limited, Connexa Limited, Aotearoa Tower Group, One New Zealand Group Limited and Spark New Zealand Trading Limited (Submission number PC26.02)				
PC26.02 2.03	Infrastructure Introduction While the telecommunications companies preference is to have an out and out standalone chapter for network utilities which incorporates all overlays and other district wide matters, the rolling review structure for the Operative Mackenzie District Plan means that this is fraught. As such, the clear wording provided in the introduction to the Infrastructure Chapter about which other chapters in the Operative District Plan apply. Retain as notified.	Support	Consistent with Transpower's primary submission, Transpower supports the inclusion of clear wording to direct which provisions of the District Plan apply to infrastructure.	Allow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
PC26.02 2.27	<p>Infrastructure Rules New Rule</p> <p>A new rule, listed under the “all Infrastructure” subsection, which explicitly permits infrastructure within existing buildings should be included so it is abundantly clear such proposals are permitted. Amend as follows:</p> <p><i><u>All zones:</u></i> <i><u>Activity Status: PER</u></i> <i><u>Where:</u></i> <i><u>1. The infrastructure is located entirely within an existing building.</u></i></p>	Support	Transpower supports the relief sought and similarly considers that it is appropriate for infrastructure located within an existing building to be permitted on the basis that the activity would not have an adverse effect on the environment.	Allow the submission.
Director General of Conservation (Submission number PC26.03)				
PC26.03 3.03	<p>Infrastructure Entire Chapter</p> <p>There is no justification for limiting the applicability of the Ecosystem and Indigenous Biodiversity chapter to only the objective and rules, as policies and methods may also be relevant.</p> <p>Amend the Introduction as follows:</p> <p>“The provisions of other chapter in this District Plan do not apply to activities managed in this chapter, except as follows:... ...The objective and rules in Ecosystems and Indigenous Biodiversity...”</p>	Oppose	Transpower does not support the relief sought on the basis that the policies in the INF Chapter are intended to implement the Objective in the Ecosystems and Indigenous Biodiversity Chapter in a manner that is specific to infrastructure and that gives effect to the higher order planning instruments’ direction in respect of infrastructure. Further, it is considered problematic to introduce additional provisions to apply to infrastructure activities through a submission because submissions have been made on the Proposed Plan Changes on the understanding that certain provisions do not apply. A change in approach does not afford parties an opportunity to make submissions on the provisions that are relevant to the relief sought.	Disallow the submission.
PC26.03 3.05	Infrastructure Policies Policy INF-P5	Oppose	Transpower does not support the relief sought, insofar as the relief relates to the National Grid, because the amendments sought to clauses (2) and (3) do not give effect to the NPSET. That is, the NPSET does not have a requirement to minimise adverse effects on indigenous vegetation and	Disallow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>This policy adopts an effects management hierarchy approach, which is appropriate, but the drafting could better align with best practice.</p> <p>The policy would allow loss of significant indigenous vegetation and habitats and their values, which is inconsistent with s6(c) and s31(1)(b)(iii) of the RMA, the Objective and Clause 3.10 of the National Policy Statement for Indigenous Biodiversity (NPSIB), and Objective 9.2.3 and Policy 9.3.1 of the CRPS.</p> <p>Amend as follows, or words to like effect:</p> <p><i>"Avoid locating infrastructure in identified sensitive areas (outside the road reserve) or within an area of significant indigenous vegetation or significant habitat of indigenous fauna, unless:</i></p> <ol style="list-style-type: none"> <i>1. there is a functional or operational need for the infrastructure to be in that location;</i> <i>2. it is demonstrated through site, route or method selection, design measures and other management methods how significant adverse effects on the values of the sensitive or significant area have been avoided as far as practicable, and otherwise <u>minimised or remedied or mitigated</u>;</i> <i>3. where there are more than minor adverse effects that cannot be avoided, <u>minimised or remedied or mitigated</u>, regard is had to any offsetting or compensation; and</i> <i>4. Following application of 1. - 3. above, there are no <u>significant more than minor</u> residual adverse effects remaining, (except that this clause shall not apply to the national grid)."</i> 		<p>habitats, rather the NPSET has a generic direction to avoid, remedy or mitigate such effects. Further, the NPSIB does not apply to the National Grid and therefore any direction to minimise adverse effects in the NPSIB is not relevant or appropriate for the National Grid.</p>	

Helios Energy Limited (Submission number PC26.04)

PC26.04 4.03	<p>Interpretation</p> <p>Definitions</p> <p>Transmission Lines</p> <p>The definition does not take into account the transmission infrastructure (such as transmission lines) required from a solar farm to a substation, which may not be part of the National Grid.</p> <p>Amend as follows:</p>	Oppose	<p>Transpower does not support the submission on the basis that the relief sought is of no consequence to any provision in the Proposed Plan Change. That is, the term is used only in respect of the National Grid Yard and National Grid Subdivision Corridor provisions that only apply to the National Grid in any case. It is noted that the definition replicates the NESETA definition that</p>	Disallow the submission.
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Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<i>"a. means the facilities and structures used for, or associated with, the overhead or underground transmission of electricity <u>to and</u> in the national grid; and..."</i>		also relates only to the National Grid. For this reason, Transpower prefers that the notified definition be retained.	
Tekapo Landco Limited and Godwit Leisure Limited				
P26.05 5.03	Infrastructure Introduction The submitter supports the exclusion of earthworks rules for infrastructure activities as stated by "The provisions in the earthworks chapter do not apply to earthworks that form part of the activities managed in this chapter (unless specified within the rules in this chapter), but do apply to the construction of new roads and access tracks associated with any infrastructure"; however it is sought that this provision be made into a rule, and also referenced within the Earthworks Chapter. The exclusion of earthworks for infrastructure is supported however the wording is included in the 'Introduction' part of the Chapter and it is considered that this should be made into a 'Rule' in order to have legal effect.	Support	Transpower supports the submission and similarly considers that there is merit in including the direction in respect of provisions that apply to infrastructure as a rule in order to have legal effect.	Allow the submission.
Nova Energy Limited (Submission number PC26.06)				
P26.06 6.05	Interpretation Definitions Transmission Line This definition could also apply to the connection of transmission lines between electricity generation infrastructure and distribution networks, as well as the national grid. The additional wording is not required within the definition. Amend as follows: "a. means the facilities and structures used for, or associated with, the overhead or underground transmission of electricity <u>in the</u> <u>national grid</u> ; and b. includes transmission line support structures, telecommunication cables, and telecommunication devices to which paragraph a. applies; but	Oppose	Transpower does not support the submission on the basis that the relief sought is of no consequence to any provision in the Proposed Plan Change. That is, the term is used only in respect of the National Grid Yard and National Grid Subdivision Corridor provisions that only apply to the National Grid in any case. It is noted that the definition replicates the NESETA definition that also relates only to the National Grid. For this reason, Transpower prefers that the notified definition be retained.	Disallow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	c. does not include an electricity substation."			
NZ Transport Agency Waka Kotahi (Submission number PC26.08)				
P26.08 8.03	<p>Interpretation Definitions Sensitive Activity</p> <p>Supports the general intent of this definition. However, relief is sought to include hospitals, healthcare facilities and any elderly person housing or complex, as well as marae and places of worship in the list of sensitive activities.</p> <p>Hospitals, healthcare facilities and any elderly person housing or complex are included under the definition of 'noise sensitive activities' in the CRPS. Places of worship and maraes are generally susceptible to noise and should therefore also be included under this definition.</p> <p>Amend as follows:</p> <p><i>"means any:</i></p> <ul style="list-style-type: none"> <i>a. residential activity</i> <i>b. visitor accommodation</i> <i>c. community facility</i> <i>d. educational facility</i> <i>e. Hospitals, healthcare facilities and any elderly person housing or complex</i> <i>f. Marae and places of worship"</i> 	Support	<p>Transpower supports the submission on the basis that the relief sought is generally consistent with the definition of 'sensitive activities' in the NPSET.</p>	Allow the submission.
Te Rūnanga o Ngāi Tahu (Submission number PC26.12)				
P26.12 12.01	<p>Infrastructure Introduction</p> <p>While the introduction does acknowledge the impacts that infrastructure can have on Mana whenua values the introduction does not include the SASM chapter as a chapter that applies to these provisions however the infrastructure refers to matters covered in the SASM chapter.</p> <p>Amend as follows:</p>	Oppose	<p>Transpower does not support the relief sought on the basis that:</p> <ul style="list-style-type: none"> - it is understood that the provisions in the INF Chapter are intended to address the impact of infrastructure activities on SASM in a specific way; - it is problematic to introduce such a fundamental change through a submission such that the parties affected by the change do not have the 	Disallow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><i>The provisions in other chapters in this District Plan do not apply to activities managed in this chapter, except as follows:</i></p> <ul style="list-style-type: none"> • <i>Sites and Areas of Significance to Māori</i> • <i>Natural Hazards</i> • <i>Historical Heritage..."</i> 		opportunity to submit on the SASM provisions (given the Proposed Plan Change was notified with a clear understanding that these provisions do not apply to infrastructure).	
Royal Forest and Bird Protection Society of New Zealand Inc (Submission number PC26.13)				
P26.13 13.15	<p>Infrastructure</p> <p>Entire Chapter</p> <p>Forest & Bird has similar concerns with the wording and approach in the INF chapter that would override the objective and policies of the EIB chapter and that the scope of permitted and controlled activities is inappropriate to protect significant and outstanding natural areas and the need for appropriate discretion in RDIS rules for effects on ecological, natural landscape, features, and character.</p> <p>Amend the INF chapter to address concerns, including that the EIB chapter applies with respect to effects on indigenous biodiversity.</p>	Oppose	<p>Transpower does not support the relief sought on the basis that the policies in the INF Chapter are intended to implement the Objective in the Ecosystems and Indigenous Biodiversity Chapter in a manner that is specific to infrastructure and that gives effect to the higher order planning instruments' direction in respect of infrastructure. Further, it is considered problematic to introduce additional provisions to apply to infrastructure activities through a submission because submissions have been made on the Proposed Plan Changes on the understanding that certain provisions do not apply. A change in approach does not afford parties an opportunity to make submissions on the provisions that are relevant to the relief sought.</p>	Disallow the submission.
Genesis Energy Limited (Submission number P26.15)				
PC26.15 15.01	<p>Interpretation</p> <p>Definitions</p> <p>New Definition -Minimise</p> <p>The term "minimise" is used in INF-P4 and INF-P6 but is not defined in the plan change. Genesis seeks adoption of a new definition set out in the relief sought.</p> <p>Insert new definition as follows:</p> <p><i>"Minimise means:</i></p> <p><i>To reduce to the smallest amount reasonably practicable."</i></p>	Support	<p>Transpower does not oppose the proposed definition of "minimise". However, it is considered that the definition is not necessary to assist in understanding Policies INF-P4 and INF-P6 on the basis that the term is well understood.</p>	Allow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
PC26.15 15.38	<p>Infrastructure Objectives INF-O3</p> <p>Support the intent of Objective INF-O3 which seeks to ensure that the efficient operation, maintenance, upgrading and development of regionally significant infrastructure is not constrained or compromised by other activities; however, consider that infrastructure of local and national significance along with lifeline utility infrastructure should also be included alongside regionally significant infrastructure.</p> <p>Amend Objective INF-O3 as follows:</p> <p><i>"The efficient operation, maintenance, upgrading and development of <u>locally</u>, <u>regionally</u> or <u>nationally</u> significant infrastructure and <u>lifeline utility infrastructure</u> is not constrained or compromised by other activities."</i></p>	Support	Transpower supports the relief sought and considers that it is appropriate to also reference locally and nationally significant infrastructure, along with lifeline utilities, in the Objective.	Allow the submission.
PC26.15 15.44	<p>Infrastructure Policies Policy INF-P6</p> <p>Gensis generally supports the policy pathway provided by INF-P6 for the establishment of regionally significant infrastructure or lifeline utility infrastructure that has a functional or operational need to be located on highly productive land. However, Genesis considers that nationally significant infrastructure should also be included.</p> <p>Amend INF-P6 as follows:</p> <p><i>"Avoid locating infrastructure on Highly Productive Land, unless:</i></p> <ol style="list-style-type: none"> <i>1. it is small-scale and does not impact the productive capacity of the land; or</i> <i>2. it is regionally or nationally significant infrastructure or lifeline utility infrastructure and has a functional need or operational need to be located on the highly productive land;</i> <p><i>and..."</i></p>	Support	Transpower supports the relief sought and considers that it is appropriate to also reference nationally significant infrastructure in the Policy.	Allow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
Alpine Energy Limited (Submission number PC26.17)				
PC26.17 17.07	<p>Infrastructure</p> <p>Rules</p> <p>INF-R8</p> <p>Seeks 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.</p> <p>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.</p> <p>Amend as follows:</p> <p><i>"1. Where located within a Residential, <u>Rural Lifestyle</u>, Open Space, Commercial and Mixed Use, <u>Industrial</u> or Pukaki Village Zone:</i></p> <ul style="list-style-type: none"> <i>a. Any new lines must be located underground; or</i> <i>b. Any extension to an existing overhead line must involve no more than three additional support structures."</i> 	Support	<p>Transpower supports the submission to the extent that a requirement to underground all new lines is expensive. Transpower also notes undergrounding lines may not be the most appropriate in respect of operational constraints. That said, it is acknowledged that a consent pathway remains for overhead lines in the listed zones.</p>	Allow the submission.
Meridian Energy Limited (Submission number PC26.18)				
PC26.18 18.01	<p>Interpretation</p> <p>Definitions</p> <p>New Definition – Minimise</p>	Support	<p>Transpower does not oppose the proposed definition of "minimise". However, it is considered that the definition is not necessary to assist in</p>	Allow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>The term “minimise” is used in INF-P4 and INF-P6 but is not defined in the plan change. Seeks adoption of the definition of “minimise” set out its relief sought.</p> <p>Insert new definition as follows:</p> <p><i>“Minimise means: to reduce to the smallest amount reasonably practicable.”</i></p>		understanding Policies INF-P4 and INF-P6 on the basis that the term is well understood.	
PC26.18 18.13	<p>Infrastructure</p> <p>Objectives</p> <p>Objective INF-O3</p> <p>While Meridian generally supports INF-O3, Meridian considers that it should be extended to address locally, regionally and nationally significant infrastructure. With this, Meridian notes that the notified definition of regionally significant infrastructure does not include nationally significant infrastructure, and considers that specific reference to nationally significant infrastructure is needed in this objective.</p> <p>Amend Objective INF-O3 as follows:</p> <p><i>“The efficient operation, maintenance, upgrading and development of locally, regionally and nationally significant infrastructure is not constrained or compromised by other activities.”</i></p>	Support	Transpower supports the relief sought and considers that it is appropriate to also reference locally and nationally significant infrastructure in the Objective.	Allow the submission.
PC26.18 18.19	<p>Infrastructure</p> <p>Policies</p> <p>Policy INF-P6</p> <p>Generally supports INF-P6, but considers that nationally significant infrastructure should also be listed in condition 2 of this policy. It is possible that nationally significant infrastructure, that is not otherwise described in the definition of ‘regionally significant infrastructure’ or ‘lifeline utility infrastructure’, may have a functional need or operational need to be located on highly productive land.</p> <p>Amend INF-P6 as follows:</p> <p><i>“Avoid locating infrastructure on Highly Productive Land, unless:</i></p>	Support	Transpower supports the relief sought and considers that it is appropriate to also reference nationally significant infrastructure in the Policy.	Allow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p>1. <i>it is small-scale and does not impact the productive capacity of the land; or</i></p> <p>2. <i>it is regionally <u>or nationally</u> significant infrastructure or lifeline utility infrastructure and has a functional need or operational need to be located on the highly productive land; and...</i>"</p>			
Canterbury Regional Council (Submission number PC26.19)				
PC26.19 19.02	<p>Interpretation Definitions National Grid For consistency with national direction, use the NPSREG definition. Delete the definition and replace with: <i>"<u>The lines and associated equipment used or owned by Transpower to convey electricity.</u></i> <i>(National Policy Statement for Renewable Energy Generation Definition)"</i></p>	Oppose	<p>The definition included in the Proposed Plan Change replicates the definition in the NPSET. As such, the definition is consistent with national direction that relates to the National Grid. It is not clear why the submitter prefers the NPSREG definition.</p>	Disallow the submission.
PC26.19 19.04	<p>Interpretation Definitions Transmission Lines This definition is sourced from the NESETA, but the source has not been acknowledged. Add note to definition: <i>"<u>National Environmental Standards for Electricity Transmission Activities Definition</u>"</i></p>	Support	<p>Transpower supports including reference to the NESETA.</p>	Allow the submission.
PLAN CHANGE 27: SUBDIVISION, EARTHWORKS, PUBLIC ACCESS AND TRANSPORT				
Chorus New Zealand Limited, Connexa Limited, Aotearoa Tower Group, One New Zealand Group Limited and Spark New Zealand Trading Limited (Submission number PC27.6)				
PC27.06 6.04	<p>Earthworks Introduction Seek a similar statement to that found in the Infrastructure chapter that earthworks rules do not cover infrastructure activities. Amend as follows:</p>	Support	<p>Transpower supports the relief sought on the basis that the additional sentence provides greater clarity for plan users by setting out how the Proposed Plan Change manages earthworks associated with infrastructure activities.</p>	Allow the submission.

Reference	Provision and Relief Sought	Support/ Oppose	Reason	Allow/Disallow
	<p><i>"This earthworks chapter covers general earthworks provisions in all rural, residential, commercial and mixed use and industrial zones. Additional earthworks provisions may apply within overlays such as Outstanding Natural Landscapes and Sites and Areas of Significance to Māori. These earthworks provisions have been included in the respective Overlay chapters because they address the overlay related effects of earthworks on the identified values, characteristics, risks, or features. <u>The earthworks provisions within overlays apply in addition to the provisions of this chapter unless specified otherwise.</u> <u>The chapter does not cover earthworks associated with infrastructure activities, unless it is specified within the rules in the infrastructure chapter that earthworks provisions apply.</u>"</i></p>			