



Timaru District Council
2 King George Place
Timaru 7910
Phone: 03 687 7200

Further submission in support of, or in opposition to, submission on the Proposed Timaru District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Further submissions close on **Friday 4 August 2023 at 5pm**

To: **Timaru District Council**

This is a further submission in support of, or in opposition to, a submission on the **Proposed Timaru District Plan**.

Full name of person making further submission:

Fabia Fox

Organisation name and contact (if representing a group or organisation):

Alpine Energy Limited

Only certain persons can make a further submission. Please select the option that applies.

I am:

- a person representing a relevant aspect of the public interest;
- a person who has an interest in the proposal that is greater than the interest the general public has;
- the local authority for the relevant area.

Please explain why you come within the category selected above:

As a Lifeline Utility provider, and the owner of the electricity distribution network across the Timaru District

Alpine Energy's interest is greater than the interest the general public has

Hearing options

I wish to be heard in support of my further submission? Yes No

If others make a similar further submission, I will consider presenting a joint case with them at a hearing.

Yes No

Signature: Fabia Fox Date: 11/08/2023

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - A signature is not required if you submit this form electronically. By entering your name in the box above you are giving your authority for this application to proceed.

Electronic address for service of person making further submission: fabia.fox@alpineenergy.co.nz

Telephone: 0274693702

Postal address (or alternative method of service under section 352 of the Act):

PO Box 530, Timaru 7940

Contact person: *[name and designation, if applicable]:* Fabia Fox, Regulatory and Sustainability Manager

You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Council)

Yes No

Further submissions close on Friday 4 August 2023 at 5pm.

Name of person making further submission: **Alpine Energy Limited**

| This further submission is in relation to the original submission of: <i>Enter the name of the original submitter as per the SoDR. E.g. Timaru District Council</i> | This further submission is in relation to the original submission Number: <i>enter the unique submission number as per the SoDR. E.g. 42.45</i> | The particular parts of the original submission I/we support /oppose are: | My/our position on the original submission is: <i>Support or oppose</i> | The reasons for my/our support/ opposition to the original submission are: | Allow or disallow the original submission (in full or in part) | Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point |
|--|--|--|--|---|--|--|
| Timaru District Council | 42.14; | Considers there is an inconsistent use of terminology in the EI section. For example, the objectives and policies refer to regionally significant infrastructure, lifelines utilities and other infrastructure. However, the implementing rules and standards refer to infrastructure and network utilities interchangeably. Greater certainty is required for plan users. | Support | This will provide greater certainty to Alpine Energy Limited and the application of rules to meet objectives and policies | Allow in full | As amended by the submitter |
| Kianga Ora | 229.14 | Considers the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid | Oppose | Lifeline Utilities, including the National Grid, and significant distribution lines require protection from adverse effects, including reverse sensitivity. | Disallow | Alpine Energy supports alignment with NPSET and retaining the objectives, policies and rules relating to the protection of regionally significant infrastructure and lifeline utilities, and seeks further protection for significant distribution lines by way of an amendment to include a new rule protecting 33kV electricity distribution lines. Alpine Energy proposes that activities and development adjacent to 33kV electricity lines are a discretionary activity where: a. New sensitive activity and new buildings (excluding accessory buildings) within 10m of the centreline of a 33kV electricity distribution line or within 10m of the visible outer edge of a foundation or an associated pole or tower; and b. New fences more than 2.5m high within 5m of the visible outer edge of a foundation for a 33kV electricity distribution line, pole or tower. And that the storage of hazardous substances near 33kV electricity distribution lines is non-compliant where: a. The activity is within 10m from the centreline of a 33kV electricity distribution line. Alpine Energy proposes a notification requirement for non complaint activities: a. Any application arising shall not be subject to public notification but may be limited notified only to the relevant electricity distribution line operator, unless their written approval is provided. |
| Radio New Zealand Limited | 152.27 | Support amendments that refer to lifeline utilities and the risks of reverse sensitivity effects | Support | Lifeline utilities, including electricity distribution networks require protection from adverse effects including reverse sensitivity | Allow in full | As amended by the submitter |
| Timaru District Council | 42.15 | Considers it is appropriate for the introduction to refer to "Lifelines Utilities" in addition to Regionally Significant Infrastructure and other infrastructure. A typographical error should be corrected. | Support | Alpine Energy Limited is not included in the definition of 'Regionally Significant Infrastructure' in the PDP. We have submitted seeking this be amended to recognise the regional significance and criticality of the electricity distribution network as a lifeline utility. Amending the introduction to include 'Lifeline Utilities' as submitted by TDC will, in part, achieve this. | Allow in full | As amended by the submitter |

| This further submission is in relation to the original submission of: <i>Enter the name of the original submitter as per the SoDR. E.g. Timaru District Council</i> | This further submission is in relation to the original submission Number: <i>enter the unique submission number as per the SoDR. E.g. 42.45</i> | The particular parts of the original submission I/we support /oppose are: | My/our position on the original submission is: <i>Support or oppose</i> | The reasons for my/our support/ opposition to the original submission are: | Allow or disallow the original submission (in full or in part) | Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point |
|--|--|---|--|---|--|--|
| Timaru District Council | 42.16 | Considers it is appropriate for the introduction to refer to "Lifelines Utilities" in addition to Regionally Significant Infrastructure and other infrastructure. A typographical error should be corrected. | Support | Alpine Energy Limited is not included in the definition of 'Regionally Significant Infrastructure' in the PDP. We have submitted seeking this be amended to recognise the regional significance and criticality of the electricity distribution network as a lifeline utility. Amending the introduction to include 'Lifeline Utilities' as submitted by TDC will, in part, achieve this. | Allow in full | As amended by the submitter |
| Connexa | 176.35 | Considers the title of the objective should include lifeline utilities, given they are provided for in the body of the objectives. | Support | Lifeline utilities to be recognised in the title to align with content of objectives | Allow in full | As amended by the submitter |
| Timaru District Council | 42.17 | Amend title to include lifeline utilities | Support | Lifeline utilities to be recognised in the title to align with content of objectives | Allow in part | As amended by the submitter |
| Transpower New Zealand Limited | 159.33 | The submitter does not support the objective in so far as it relates to the National Grid. The reasons include: 1. The requirement to avoid adverse effects is overly onerous and not consistent with the NPSET nor Policy 16.3.4 of the CRPS. 2. It is more stringent than the approach to other infrastructure. 3. The requirement to achieve all relevant objectives in underlying zones is overly onerous and inconsistent with sections 104 and 171 of the RMA. 4. The requirement to avoid adverse effects does not give effect to provisions of the CRPS, including Policy 5.3.9 or the requirement to facilitate the operation and development of the National Grid in the objective of the NPSET | Support | Alignment with NPSET | Allow in full | As amended by the submitter |

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|--|--|---|--|---|--|---|
| Alpine Energy Limited | 55.7 | Considers there is an inconsistent use of terminology in the EI section. For example, the objectives and policies refer to regionally significant infrastructure, lifelines utilities and other infrastructure. However, the implementing rules and standards refer to infrastructure and network utilities interchangeably. Greater certainty is required for plan users. | Oppose | Alpine Energy Limited's submission opposing the EI-O4 was an error in the submission form. Alpine Energy Supports the EI-O4, as it recognises that the efficient operation, maintenance, repair, upgrading or development of Regionally Significant Infrastructure and Lifeline Utilities should not be constrained or compromised by the adverse effects of subdivision, use and development, including reverse sensitivity. | Disallow in part | Disallow the stated "opposition", and allow the submission summary point included in the submission. Alpine Energy Limited seeks to amend our original submission to change "oppose" to "support" for EI-O4 |
| Kainga Ora | 245.44 | EI-O4 - Considers that the objective should reflect the NPSET, that seeks that activities are managed 'to the extent reasonably possible (e.g. Policy 10). | Oppose | Regionally Significant Infrastructure and Lifeline Utilities should not be constrained or compromised by the adverse effects of subdivision, use and development, including reverse sensitivity. Limiting the Objective only to the operation, maintenance and repair of infrastructure, and not the upgrading or development, fails to recognise the impact of growth requirements, especially as a result of decarbonisation through electrification and the need to protect new regionally significant and lifeline utility infrastructure from adverse effects. | Disallow | Disallow the amendment proposed |
| Timaru District Council | 42.19 | EI-P2 Related to submission on Objective EI-O2. Considers Policy E1-P2 should be to cover the situation where there are no alternative sites, routes or methods for the proposed infrastructure, e.g., due to design or locational constraints. Amend EI-P2.2 to include a further sub-clause such as "the extent to which viable alternative sites, routes or methods are available" or similar. | Support | Alpine Energy Limited supports this amendment as it recognises that locational constraints on infrastructure can prohibit viable alternatives and it is appropriate for the policy to consider the extent to which viable alternative sites, routes or methods are available. | Allow in full | As amended by the submitter |
| Transpower New Zealand Limited | 159.49 | EI-P1 support the submission to amend the policy to allow the establishment of electricity transmission infrastructure | Support | To deliver on the EI-P1 (6), to allow large scale renewable generation, the policy should also support the establishment of electricity transmission and distribution networks to achieve the benefits of the renewable generation | Allow in full | As amended by the submitter, with a further amendment: x. allowing the establishment of new and the development of development of electricity distribution assets |
| Timaru District Council | 42.19 | EI-P2 The policy should cover the situation where there are no alternative sites, routes or methods for the proposed infrastructure, e.g. due to design or location constraints | Support | To implement EI-O2, the policy should allow for such situations as they apply to electricity distribution networks | Allow in full | As amended by the submitter |

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|--|--|---|--|--|--|---|
| Radio New Zealand Limited | 152.32 | EI-P2 Alpine Energy supports the amendment to refer to lifeline utilities | Support | To be consistent with other provisions within the PDP | Allow in full | As amended by the submitter |
| Timaru District Council | 42.20 | EI-P3 Amend title to include lifeline utilities | Support | Recognising lifeline utilities within this policy aligns with the objectives | Allow in full | To give effect to the objective, and the amended policy (as submitted) Alpine Energy further submits that as lifeline utilities, significant distribution lines require greater protection than is currently allowed in the PDP. Alpine Energy proposes an amendment to include a new rule protecting 33kV electricity distribution lines. Alpine Energy proposes that activities and development adjacent to 33kV electricity lines are a discretionary activity where: a. New sensitive activity and new buildings (excluding accessory buildings) within 10m of the centreline of a 33kV electricity distribution line or within 10m of the visible outer edge of a foundation or an associated pole or tower; and b. New fences more than 2.5m high within 5m of the visible outer edge of a foundation for a 33kV electricity distribution line, pole or tower. And that the storage of hazardous substances near 33kV electricity distribution lines is non-compliant where: a. The activity is within 10m from the centreline of a 33kV electricity distribution line. Alpine Energy proposes a notification requirement for non complaint activities: a. Any application arising shall not be subject to public notification but may be limited notified only to the relevant electricity distribution line operator, unless their written approval is provided. |
| Royal Forest and Bird Protection Society | 156.67 | EI- R11 Oppose submission to not permit new overhead lines within the coastal environment | Oppose | This amendment would hamper Alpine Energy's ability to provide cost-effective electricity infrastructure to the Timaru community | Oppose | Disallow the amendment proposed |
| Connexa; Chorus New Zealand; Vodafone New Zealand Limited; Spark New Zealand Trading Limited | 176.51; 208.51; 209.51; 210.51 | EI-R13 Support extending new overhead lines to commercial and mixed use zone | Support | These zones tend to have larger buildings which comfortably assimilate overhead lines. | Allow in full | As amended by the submitter |
| Connexa; Chorus New Zealand; Vodafone New Zealand Limited; Spark New Zealand Trading Limited | 176.55; 208.55; 209.55 210.55 | EI-R17 Footprint of network utilities should be consistent with the underlying zone provisions in the manner that setback and height in relation to boundary is under PER-1 | Support | Consistency with other rules | Allow in full | As amended by the submitter |
| Royal Forest and Bird Protection Society | 156.64 | EI-R2 Oppose the amendment to not permit upgrading of underground infrastructure in the coastal environment | Oppose | The amendment will hamper and increase the cost of maintaining lifeline utility assets and is inconsistent with EI-P1 | Oppose | Disallow the amendment proposed |
| Transpower New Zealand Limited | 159.4 | EI-R2 Support the rule, but not that it is more stringent than EI-R3 providing for new underground infrastructure | Support | Consistency with other rules | Support | As amended by the submitter |

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|--|--|---|--|---|--|--|
| Royal Forest and Bird Protection Society | 156.65 | EI-R3 Oppose the amendment to not permit upgrading of infrastructure in the coastal environment | Oppose | The amendment will hamper and increase the cost of maintaining lifeline utility assets and is inconsistent with EI-P1 | Oppose | Disallow the amendment proposed |
| Transpower New Zealand Limited | 159.86 | CE-P13 Support the policies relating to Regionally Significant Infrastructure in Coastal Hazard Areas, and submit that this be extended to include Lifeline Utilities, recognising that there are functional and operational needs for lifeline utilities in the coastal environment | Support | Consistency with Objectives and Policies in the Energy and Infrastructure Section of the PDP that recognise the equal status of Regionally Significant Infrastructure and Lifeline Utilities. Further, Regionally Significant Infrastructure, including the Port of Timaru, is reliant the electricity distribution network as a lifeline utility | Allow | Amend CE-P13 as follows: CE-P11 Regionally Significant Infrastructure and Lifeline Utilities in Coastal Hazard Areas |
| Connexa | 176.84 | CE-R7 Support the rule relating to maintenance and upgrading of Regionally Significant Infrastructure in Coastal Hazard Areas, and submit that this be extended to include Lifeline Utilities, recognising that there are functional and operational needs for lifeline utilities in the coastal environment and maintenance and upgrading of these utilities is of equal importance to that of Regionally Significant Infrastructure | Support | Consistency with Objectives and Policies in the Energy and Infrastructure Section of the PDP that recognise the equal status of Regionally Significant Infrastructure and Lifeline Utilities. Further, Regionally Significant Infrastructure, including the Port of Timaru, is reliant the electricity distribution network as a lifeline utility, and the maintenance and upgrading of existing lifeline utility assets should be recognised accordingly within the rule | Allow | Amend CE-R7 as follows: CE-R7 Regionally Significant Infrastructure and Lifeline Utilities - maintenance and upgrade |
| Transpower New Zealand Limited | 159.87 | CE-R8 Support the rule relating to new Regionally Significant Infrastructure in Coastal Hazard Areas, and submit that this be extended to include Lifeline Utilities, recognising that there are functional and operational needs for lifeline utilities in the coastal environment and maintenance and upgrading of these utilities is of equal importance to that of Regionally Significant Infrastructure | Support | Consistency with Objectives and Policies in the Energy and Infrastructure Section of the PDP that recognise the equal status of Regionally Significant Infrastructure and Lifeline Utilities. Further, Regionally Significant Infrastructure, including the Port of Timaru, is reliant the electricity distribution network as a lifeline utility, and the maintenance and upgrading of existing lifeline utility assets should be recognised accordingly within the rule | Allow | Amend CE-R8 as follows: CE-R8 Regionally Significant Infrastructure and Lifeline Utilities - New |

From: [Fabia Fox](#)
To: [PDP](#)
Subject: [Potential Impersonation] - RE: Alpine Energy Limited Further Submissions to PDP
Date: Tuesday, 22 August 2023 3:36:56 pm
Attachments: [image005.png](#)
[image006.jpg](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[bluelogo\(002\)_303301db-bbfa-4294-9583-bf31cedd3081.jpg](#)
[picture2_937c8feb-2410-4fe0-a6bd-4c7fec25079e.png](#)
[picture3_f77a5e1d-45f4-496d-911a-15a03b75b9b2.png](#)
[picture1_a2ea0dfa-c03a-4e37-b6f6-8c7a8cc4267d.png](#)
[TDC PDP Submission - Further Submission Table for multiple submission points.pdf](#)
[TDC PDP Submission - Further Submission Table for multiple submission points.xlsx](#)

This message was sent from outside the company by someone with a display name matching a user in your organisation. Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

Hi Jane

Thanks for the email. Sorry about that, something funny is happening with the text wrap there. Certainly left that proposal as a bit of a cliff hanger!

Please find attached the Excel and a new and improved PDF.

Any other issues please let me know.

Fabia Fox / Regulatory & Sustainability Manager
T 0800 661177 P 027 469 3702 W alpineenergy.co.nz
24 Elginshire Street, Washdyke | PO Box 530, Timaru

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We are a member of the Utilities Disputes complaints scheme. If you have raised a complaint that we have not managed to resolve, you can contact [Utilities Disputes](#) for resolving complaints, this is a free and independent service. This communication may contain information that is confidential and subject to legal privilege. If you have received this email in error, please notify us immediately and permanently delete this communication. If you are not the intended recipient any disclosure, dissemination, distribution, copying, retention, or other use is prohibited. Please consider the environment before printing this email.

From: PDP <pdp@timdc.govt.nz>
Sent: Tuesday, August 22, 2023 2:31 PM
To: Fabia Fox <Fabia.Fox@alpineenergy.co.nz>
Subject: Alpine Energy Limited Further Submissions to PDP

Hello Fabia,

Thank you for your further submission. Could you please forward the further submission table in Excel format as it appears one or two of the rows have cut off in the PDF document for e.g Timaru District Council – 42.20 – last column ends as follows –“ a. Any application arising shall not be subject to public notification but...” Thank you.

regards

Jane



Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: Fabia Fox <Fabia.Fox@alpineenergy.co.nz>

Sent: Friday, August 11, 2023 4:49 PM

To: PDP <pdp@timdc.govt.nz>

Subject: [Potential Impersonation] - Alpine Energy Limited Further Submissions to PDP

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Kia ora PDP Team

Please find attached Alpine Energy Limited's further submission to the Proposed Timaru District Plan.

Any questions on the submission, please let me know.

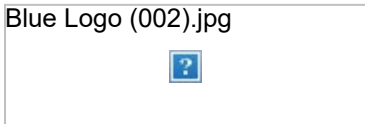
Kind regards, and happy Friday

Fabia Fox / Regulatory & Sustainability Manager

T [0800 661177](tel:0800661177) **P** [027 469 3702](tel:0274693702) **W** alpineenergy.co.nz

24 Elginshire Street, Washdyke | PO Box 530, Timaru

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