

Chapter: EI – Energy and Infrastructure

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
100.4	EI – Energy and Infrastructure	EI-R29 New open drains, or extension or expansion of existing, systems, open drains and channels, pipes, water reservoirs, storage ponds and other	General	<p><i>EI-R29 It is unclear where this rule applies, it is currently written as applying to the National Grid. This rule should only be within the 12m footprint of support structures, therefore the National Grid Yard.</i></p> <p><i>Policy 10 of the National Policy Statement for Electricity is the relevant policy provision for non-sensitive rural activities, and it does not provide for this type of restriction.</i></p> <p><i>We oppose this rule.</i></p>	
100.5	EI – Energy and Infrastructure	EI-R35 The reticulation and storage of water for irrigation purpose	General	<p><i>EI-R35 Oppose. The reticulation and storage of water should only be an issue where the water channels permanently obstruct existing vehicular access to the National Grid. As National Grid lines cross lakes and harbours across the country, a farm storage pond is extremely unlikely to present a problem.</i></p> <p><i>We seek an exemption for irrigation within the National Grid Yard;</i></p> <p><i>Irrigation equipment used for primary production purposes that does not permanently obstruct existing vehicular access to a National Grid support structure is permitted.</i></p>	

		s within the National Grid Yard			
143.30	EI – Energy and Infrastructure	General		<p><i>Energy and Infrastructure</i></p> <ul style="list-style-type: none"> Regionally significant infrastructure is to be provided for, whilst ensuring adverse effects are avoided, remedied or mitigated as much as possible across the district. Policies and methods seek to align with national instruments (e.g. National Policy Statement on Electricity Transmission), while ensuring enabling a permitted activity and consenting framework for maintenance and operation, and consenting framework for new infrastructure. <p><i>Energy and Infrastructure</i></p> <ul style="list-style-type: none"> Provisions are supported in principle at this stage. National Grid Corridors or Yards should be mapped as overlays to provide clarity to land owners. 	<ul style="list-style-type: none"> National Grid Corridors or Yards should be mapped as overlays on District Plan maps.
158.13	EI – Energy and Infrastructure	General		<p>1. We are unclear the extent to which this chapter is intended (or not) to provide for the Port as regionally significant infrastructure. By definition the Port is defined as infrastructure, but the rules of this chapter do not appear to provide for it, other than possibly EI-R1.</p>	
68.15	EI – Energy and Infrastructure	General	General	<p>This section needs better layout under the energy, communications, water, sewage, storm-water, and transport headings.</p> <p>Also it needs to be clear that when talking about regional infrastructure, this is also including national and district infrastructure.</p>	
145.27	EI – Energy and Infrastructure	Introduction	The Infrastructure and Energy	support	retain

			chapter contains dis		
118.4	EI – Energy and Infrastructure	Introduction	General	<p>█ generally supports the Introduction to the Energy and Infrastructure provisions and in particular reference to giving effect to the National Policy Statement on Electricity Transmission. █ seeks further amendments to the Introduction to better reflect the relationship of the District Plan provisions with the National Environmental Standards on Electricity Transmission Activities 2009 (NESETA) as follows:</p> <p>“... Are consistent with:</p> <ol style="list-style-type: none"> 4. the National Environmental Standards on Electricity Transmission Activities 2009 (NESETA); and 5. the National Environmental Standards for Telecommunications Facilities 2016 (NESTF). <p>Notwithstanding any other rules in the District Plan, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 apply to the operation, maintenance, upgrading, relocation or removal of National Grid transmission lines that were operating or able to be operated on, or prior to, 14 January 2010 and remain part of the National Grid. In this case of conflict with any other provision in the District Plan, the NESETA prevails.”</p>	
80.3	EI – Energy and Infrastructure	Objective	Effective, resilient, efficient and safe regionally significant infrastructure that: provides essential and secure services, including in emergency	<p>█ supports the intent of this objective, presuming the Draft Plan is amended to recognise radiocommunication networks and/or lifeline utilities as regionally significant infrastructure.</p>	<p>If it is not, then it seeks amendment of this objective to recognise the benefits of lifeline utilities as well as regionally significant infrastructure.</p>

83.3	EI – Energy and Infrastructure	Objective	Effective, resilient, efficient and safe regionally significant infrastructure that: provides essential and secure services, including in emergency	██████████ are in general support Objective EI-01.	Retain Objective EI-01 and associated provisions.
86.4	EI – Energy and Infrastructure	Objective	EI-01 Regionally significant infrastructure	<i>It is appropriate that regionally significant infrastructure contributes to the economy, enables people and communities and aligns with development.</i>	Retain the EI-01 as drafted.
96.5	EI – Energy and Infrastructure	Objective	EI-01 Regionally significant infrastructure	██████████ supports the recognition of regional significant infrastructure, especially that which provides an ‘essential and secure service’ especially in ██████████ emergencies. <i>While ██████████ and other ██████████ facilities are not included under ‘Regionally Significant Infrastructure’, the provision that this infrastructure will provide an ‘essential and secure services, including in emergencies’, makes it relevant for ██████████</i>	
108.2	EI – Energy and Infrastructure	Objective	EI-01 Regionally significant infrastructure	<i>Objective Ei-01</i> ██████████ supports the recognition in the objective of the important contribution that established community-scale irrigation and stock-water infrastructure makes to the economy.	
118.5	EI – Energy and	Objective	EI-01 Regionally significant	██████████ supports Objective EI-01 and seeks its retention as drafted.	

	Infrastructure		infrastructur e				
145.28	EI – Energy and Infrastr ucture	Objectiv e	EI-O1 Regionally significant infrastructur e	<i>support</i>	retain		
158.7	EI – Energy and Infrastr ucture	Objectiv e	EI-O1 Regionally significant infrastructur e	1. ██████ <i>generally supports objective EI-01.</i>	Retain		
49.78	EI – Energy and Infrastr ucture	Objectiv e	EI-O2 Adverse effects of regionally significant	<table border="1"> <tr> <td>Query</td> <td>█████ supports efforts to avoid adverse effects of infrastructure on the identified characteristics and values of the overlay it is located within. We question if this goes far enough as important individual heritage items may not be included within an overlay.</td> </tr> </table>	Query	█████ supports efforts to avoid adverse effects of infrastructure on the identified characteristics and values of the overlay it is located within. We question if this goes far enough as important individual heritage items may not be included within an overlay.	
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49.173	EI – Energy and Infrastr ucture	Objectiv e	EI-O2 Adverse effects of regionally significant	<table border="1"> <tr> <td>Query</td> <td>█████ supports efforts to avoid adverse effects of infrastructure on the identified characteristics and values of the overlay it is located within. We question if this goes far enough as important individual heritage items may not be included within an overlay.</td> </tr> </table>	Query	█████ supports efforts to avoid adverse effects of infrastructure on the identified characteristics and values of the overlay it is located within. We question if this goes far enough as important individual heritage items may not be included within an overlay.	
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43.29	EI – Energy and Infrastr ucture	Objectiv e	EI-O2 Adverse effects of regionally significant	<p><i>Amend clause (1) to read:</i></p> <p><i>are avoided on the identified characteristics and values of the overlay it is located within, unless they can be appropriately remedied or mitigated, or unless there is a functional or operational need for the infrastructure to be located within the overlay.</i></p>			

				<p>Also consider separating regionally significant infrastructure from other infrastructure, as the effects that can be tolerated for each may differ.</p> <p>This approach would be more consistent with the Canterbury Regional Policy Statement (CRPS).</p>	
108.3	EI – Energy and Infrastructure	Objective	EI-O2 Adverse effects of regionally significant	<p>Objective Ei-02</p> <p>██████████ acknowledges the objective of managing adverse effects of regionally significant infrastructure and other infrastructure.</p>	
118.6	EI – Energy and Infrastructure	Objective	EI-O2 Adverse effects of regionally significant	<p>██████████ does not support Objective EI-02 in so far as it relates to the National Grid because:</p> <ol style="list-style-type: none"> 1. It is not clear whether the Objective relates to new regionally significant infrastructure or whether the Objective also relates to the effects of existing infrastructure (and any maintenance or upgrading activities), 2. The requirement that adverse effects are avoided in overlays is overly onerous and, in terms of the National Grid does not give effect to the “seek to avoid” requirement in Policy 8 of the National Policy Statement on Electricity Transmission. Further, the requirement to avoid is not consistent with Policy 16.3.4 of the Canterbury Regional Policy Statement. 3. The requirement to achieve all relevant objectives in underlying zones is overly onerous and inconsistent with the way in which sections 104 and 171 of the RMA direct the consideration of applications for resource consent or notices of requirement for designations. 4. The requirement to avoid adverse effects does not give effect to provisions of the Canterbury Regional Policy Statement, including Policy 5.3.9 or the requirement to facilitate the operation and development of the National Grid in the objective of the National Policy Statement on Electricity Transmission. <p>██████████ supports the following alternate drafting:</p>	

				<p><i>“The adverse effects of regionally significant infrastructure and other infrastructure:</i></p> <ol style="list-style-type: none"> <i>1. are avoided on the identified characteristics and values of the overlay[explicitly set out the overlays section 6 of RMA overlays only] it is located within where it is practicable to do so having regard to the operational needs and functional needs of that infrastructure; and</i> <i>2. are avoided, remedied or mitigated to achieve the relevant objectives for the underlying zone in other areas.”</i> 	
145.29	EI – Energy and Infrastructure	Objective	EI-O2 Adverse effects of regionally significant	<p><i>Seek amendment – adverse effects on overlays should be avoided unless there is a functional or operational need which means the infrastructure cannot be located elsewhere, and this should be recognised in the objective, and sets up Policy EI-P2.</i></p>	<p>Amend to read:</p> <p>The adverse effects of regionally significant infrastructure and other infrastructure:</p> <ol style="list-style-type: none"> 1. are avoided on the identified characteristics and values of the overlay it is located within unless the functional need and operational of the infrastructure requires location in the overlay, and there is no alternative location available; and 2. are avoided, remedied or mitigated to

					achieve the relevant objectives for the underlying zone in other areas.
158.8	EI – Energy and Infrastructure	Objective	EI-O2 Adverse effects of regionally significant	<p>1. Objective EI-O2 is potentially problematic. It seeks that adverse effects are ‘avoided on the identified characteristics and values of the overlay’ that the regionally significant infrastructure is located within. ■■■ is subject to multiple overlays, notably including the Coastal Environment, it may not be possible to “avoid” adverse effects on some identified characteristics and values of overlays, again notably including the Coastal Environment.</p>	
80.4	EI – Energy and Infrastructure	Objective	EI-O3 Adverse effects on regionally significant	<p>■■■ supports the need to protect regionally significant infrastructure from inappropriate subdivision and land use (again, presuming the Draft Plan is amended to recognise its facilities as Regionally Significant Infrastructure).</p>	<p>If that request is not forthcoming, ■■■ seeks amendment as follows:</p> <p>Regionally significant infrastructure and lifeline utilities is are protected from adverse effects of subdivision, use and development so that the efficient operation, maintenance, repair or upgrading of regionally significant infrastructure is and lifeline utilities are not constrained</p>

					or compromised by sensitive activities.			
96.6	EI – Energy and Infrastructure	Objective	EI-O3 Adverse effects on regionally significant	<i>Included in the definition of Regionally Significant Infrastructure is ‘community potable water systems. Ensuring that these systems are not overused is imperative to maintaining this infrastructure for general use and for in emergencies. Subdivision in particular should account for the adverse effects on the use of a water supply network.</i>				
118.7	EI – Energy and Infrastructure	Objective	EI-O3 Adverse effects on regionally significant	<p>██████ generally supports Objective EI-O3 but (insofar as the Objective relates to the National Grid) seeks the following amendments in order to give effect to Policy 10 of the National Policy Statement on Electricity Transmission by recognising that the National Grid may be compromised by activities that are not “sensitive activities”:</p> <p><i>“Regionally significant infrastructure is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development so that the efficient operation, maintenance, repair, or upgrading or development of regionally significant infrastructure is not constrained or compromised by sensitive activities.”</i></p>				
141.82	EI – Energy and Infrastructure	Objective	EI-O3 Adverse effects on regionally significant	<table border="1"> <tr> <td>EI-O3 Adverse effects on regionally significant infrastructure (RSI)</td> <td>Oppose in part</td> <td>An objective of ‘protect’ gives a very high priority to RSI over other activities. While RSI is important to the district there needs to be a balance in the recognition that is given. ████████ recognises that both land use and infrastructure is important for the region to enable communities to provide for their social and economic wellbeing. It does not seek that RSI is protected.</td> </tr> </table>	EI-O3 Adverse effects on regionally significant infrastructure (RSI)	Oppose in part	An objective of ‘protect’ gives a very high priority to RSI over other activities. While RSI is important to the district there needs to be a balance in the recognition that is given. ████████ recognises that both land use and infrastructure is important for the region to enable communities to provide for their social and economic wellbeing. It does not seek that RSI is protected.	Amend EI-O3 as follows: Ensure that sensitive activities and adverse effects of subdivision use and development do not constrain or compromise the efficient operation, maintenance, repair or upgrading of regionally significant infrastructure.
EI-O3 Adverse effects on regionally significant infrastructure (RSI)	Oppose in part	An objective of ‘protect’ gives a very high priority to RSI over other activities. While RSI is important to the district there needs to be a balance in the recognition that is given. ████████ recognises that both land use and infrastructure is important for the region to enable communities to provide for their social and economic wellbeing. It does not seek that RSI is protected.						

145.30	EI – Energy and Infrastructure	Objective	EI-O3 Adverse effects on regionally significant	<i>Support</i>	
158.9	EI – Energy and Infrastructure	Objective	EI-O3 Adverse effects on regionally significant	1. <i>Objective EI-03, pertaining to reverse sensitivity effects, is generally supported. We assume that the absence of a hyperlink to the “sensitive activities” definition is deliberate?</i>	
83.11	EI – Energy and Infrastructure	Objective	Regionally significant infrastructure is protected from adverse effects of subdivision, use and development so that the efficient operation, maintenance	<p>██████████ support the intent of Objectives EI-O3 and Policy EI-P3 but note that in line with the definition of reverse sensitivity, it is not just new or sensitive activities that may cause reverse sensitivity effects but could be a range of activities, including intensification of existing activities.</p> <p>To this effect ██████████ seek that the words ‘by sensitive activities’ in EI-O3 are deleted.</p>	
80.5	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	██████ supports the intent of this policy to recognise the benefits of regionally significant infrastructure.	<p>If its request to be recognised as such is accepted, then it supports this policy in full.</p> <p>If it is not, then it seeks amendment of this policy to</p>

									recognise the benefits of lifeline utilities as well as regionally significant infrastructure.
96.7	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	<p><i>Included in the definition of Regionally Significant Infrastructure is ‘community potable water systems. Ensuring that these systems are not overused is imperative to maintaining this infrastructure for general use and for in emergencies. Subdivision in particular should account for the adverse effects on the use of a water supply network.</i></p> <p><i>Retain as notified</i></p>					
108.4	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	<p>██████████ supports the policy.</p>					
118.8	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	<p>██████████ generally supports Policy EI-P1 but (insofar as the Objective relates to the National Grid) seeks the following additional clause (similar to that included for renewable electricity generation) in order to fully give effect to the Objective and Policy 2 of the National Policy Statement on Electricity Transmission that require the establishment of the National Grid to be facilitated and require decisionmakers to recognise and provide for the development of the National Grid:</p> <p><i>“X. providing for the establishment of new, and the development of, National Grid assets.”</i></p> <p><i>Such an amendment is also necessary to give effect to Policy 16.3.4 of the Canterbury Regional Policy Statement.</i></p>					
141.83	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	EI-P1 Recognising the benefits of RSI	Support in part	Policy point 1 refers to ‘minor upgrade’ but the term is not defined. ██████████ seeks to ensure that minor upgrade is limited to the scale and intensity of the current activity.			Define minor upgrade to refer to retaining the scale and intensity of the existing activity.

145.31	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	<i>support</i>		retain
158.10	EI – Energy and Infrastructure	Policies	EI-P1 Recognising the benefits of regionally	1. <i>Objective EI-03, pertaining to reverse sensitivity effects, is generally supported. We assume that the absence of a hyperlink to the “sensitive activities” definition is deliberate?</i>		
83.4	EI – Energy and Infrastructure	Policies	Recognise the benefits of regionally significant infrastructure by: enabling the operation, maintenance, repair, minor upgrade, or removal of region	██████████ <i>are in general support of Policy EI-P1.</i>		Retain Policy EI-P1 and associated provisions.
49.81	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	Support ██████ supports the wording of this policy		
49.164	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	Support ██████ supports the wording of this policy		

72.12	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<p>Clause 1(f) allows for new open drains for agricultural and horticultural activities where the adverse effects can be minimised. █████ cautions the continued promotion or acceptance of open drains. Open drains are known to be very inefficient in transporting water due to large losses of water both to the ground and via evaporation. Therefore, more water is needed in the drain in order for the full amount deemed necessary to reach its destination. Climate change is predicted to bring long hot and dry springs and summers and it is important that water is used efficiently in order to balance the needs of the environment and communities, including needs for drinking water.</p>	
96.8	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<p>█████ supports this policy as drafted, as it supports and recognises the significance of important infrastructure to the community.</p> <p>Retain as notified.</p>	
102.8	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<p>█████ notes that objective EI-O1 provides for effective, resilient, efficient and safe regionally significant infrastructure (RSI) that enables people and communities to provide for their health, safety and wellbeing. █████ further notes Policy EI-P1 recognises the benefits of RSI by recognizing the functional or operational needs of RSI.</p> <p>In light of this, █████ support the inclusion of established community-scale irrigation and stock water infrastructure in the definition of RSI as this is appropriate in the context of both the benefit and potential risk of such infrastructure. However, we consider that the dDP should better differentiate between community-scale irrigation and water infrastructure and new storage of water for agricultural and horticultural activities which may occur at the farm scale and is therefore correctly excluded from the definition of regionally significant infrastructure. In particular, █████ consider EI-P2 is misguided in clause (f) which captures all new storage of water for agricultural and horticultural activities under a policy which seeks to manage adverse effects of regionally significant infrastructure. We recommend that this policy applies to community-scale infrastructure and that farm scale storage of water is addressed separately and more appropriately in the General Rural Zone policy and rule framework.</p>	
108.5	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<p>█████ supports:</p> <ul style="list-style-type: none"> the recognition in the policy, that there are functional and operational needs of rural water infrastructure networks (including the impact of not operating or upgrading it and the complexity and connectedness of the network and services); and 	

- that this will be part of the consideration of any new activities that it may seek to undertake in future.

█ suggests however, that the wording of 1(f) creates an extremely high threshold that would be difficult for any new works to meet, and is inconsistent with the treatment of urban water distribution networks. █ seeks either:

- the removal of 1 (f) which would result in new open drains, ponds and structures for the reticulation and storage of water for agriculture and horticulture activities being covered under 1 (g) of the policy; or
- rewording 1 (f) by:
 - amending the wording 'Only allowing' to 'Allowing'; and
 - clearly identifying the environmental outcome the policy is seeking to achieve; or
- rewording 1(f) to apply only to areas of significant natural landscapes (if this is the issue that Council is seeking to address).

Reasons:

1 The use of the word minimised is contradictory, and when considered as part of a discretionary resource consent under draft Rule EI-R29, effectively sets a threshold more consistent with a non-complying activity rather than a discretionary one.

The current wording of 1 (f) states:

Provide for regionally significant infrastructure and other infrastructure where any adverse effects are appropriately avoided, remedied or mitigated, by only allowing new open drains, ponds and structures for the reticulation and storage of water for agricultural and horticultural activities where the adverse effects can be minimised;

One of the principles applied by NZ courts when considering appeals on the issue of how a district plan policy was considered when assessing a resource consent

application, is - *Words mean what they plainly say. That that language is important, as are differences in wording.*

The plain definition is generally taken as the dictionary definition. The Dictionary definition of *minimise* is to reduce to the smallest possible amount or degree. Arguably this is not dis-similar to a de-minimus argument, as if the 'no more than minor effect' requirement of non-complying activities under Section 104D of the Act

This is reinforced by the use of the term *only allowing*, compared to the other parts of (1), where the language used is requiring, controlling, avoiding.

As such the current wording of 1(f) will potentially be read to mean not allowing any new works unless every potentially adverse effect is either avoided or reduced to a degree where they have little or no effect. I.e a very high threshold for a discretionary activity. Even if this is not the intent of Council, over time the current wording could give rise to such interpretations over time by both submitters and Council decision makers.

2 It is not possible to avoid adverse effects by minimising them.

3 The Resource Management Act 1991 does not differentiate between the ownership of water supply distribution assets, or between rural and urban networks. Under the definition of network utility operator, it defines both as *a person who undertakes or proposes to undertake the distribution of water for supply (including irrigation)*.

It is not apparent what potential adverse effects Council is therefore seeking to address through 1(f) of the policy. In particular, what outcome is sought to be achieved and what adverse effects of a new water infrastructure for agriculture and horticulture purposes require significantly more control in the policy and rules than urban water networks. Specifically why Rule EI-R29 requires a discretionary consent, when construction of new urban underground water supply is

				<p>permitted under Rule EI-R24 and new urban above ground water infrastructure a restricted discretionary activity under Rule EI-R28.</p> <p>Arguably differentiation on the effects of water supply networks is generally between the potential effects of underground, in-ground and overground networks, in the context of their location, with construction effects requiring potentially more consideration in dense urban areas because of the disruptive effect they can have on the already built environment.</p> <p>Without context of the potential adverse effects that Council is seeking to address, it is difficult to see why water supply for horticulture and agriculture requires a higher level of scrutiny than urban ones, nor their different treatment is consistent with Objective EI-02.</p> <p>4 Water supply infrastructure for horticulture and agriculture, including races, storage ponds and their associated facilities is integral to the rural environment. An environment that has already been modified by farming activity. In stating this, [REDACTED] recognises that there are some areas of natural significance where it may be appropriate to restrict some activities. In such cases this can be outlined in the policy rather than applying a blanket approach to the water supply networks for agriculture and horticulture.</p>	
118.9	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<p>[REDACTED] does not support Policy EI-P2 because (insofar as the Policy related to the National Grid):</p> <p>1. The requirement to avoid adverse effects in clause (1)(a) on certain values is overly onerous and, in terms of the National Grid, does not give effect to the “seek to avoid” requirement in Policy 8 of the National Policy Statement on Electricity Transmission. Further, the requirement to avoid is not consistent with Policy 16.3.4 of the Canterbury Regional Policy Statement. Practice in recent district plans has been to develop a specific policy to manage effects of the National Grid that explicitly prevails over other policies. This approach allows for the more nuanced “seek to avoid” requirement (and the Policy 16.3.4 direction) to be given effect to. [REDACTED] welcomes any opportunity to work with the Council to develop such an approach. In addition, [REDACTED] notes that this Policy appears to be more onerous than the suite of policies that apply more</p>	

				<p><i>generally to activities in the various overlays and NFL-R3. A policy approach that provides a ‘pathway’ for the National Grid in overlay areas is necessary to give effect to the NPSET.</i></p> <p><i>2. Requiring network utilities to be located underground in new areas of urban development is overly onerous and does not give effect to the NPSET. Clause (1)(d) appears to imply that if there is any new urban development near the National Grid, there would be a need for the transmission lines (and substation?) to be located underground. It is not clear who would be responsible for this costly work, whether it is an absolute requirement and whether the Policy allows for a consideration of its technical feasibility or ability to secure project funding. Recent examples of development in Timaru have demonstrated that development can occur in the vicinity of transmission lines without the need for undergrounding.</i></p> <p><i>In addition, ████████ notes that the other district-wide and zone Policies include a range of “avoid” and “only allow” provisions that may also apply to regionally significant infrastructure. These policies include directions in respect of adverse effects and the appropriateness of an activity in a particular area or zone that conflict (or are inconsistent) with Policy EI-P2. ████████ seeks that the relationship between this Policy and other policies is considered and that in all cases the need for regionally significant infrastructure to locate in different areas or zones is appropriately recognised.</i></p>			
141.84	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	EI-P2 Managing adverse effects of RSI and other infrastructure	Support in part	<p>Clause f) relates to the reticulation and storage of water for agricultural and horticultural activities where the adverse effects can be minimised. Some adverse effects may be able to be remedied. It should be clear that the RSI infrastructure for irrigation is established community scale irrigation infrastructure. There is no definition for ‘infrastructure’ in the Plan. The definition for infrastructure in the RMA includes:</p>	<p>Amend EI-P2 f)</p> <p>Providing for new open drains, storage ponds and structures for the reticulation and storage of water for rural production activities</p>

				<p><i>a water supply distribution system, including a system for irrigation.</i></p> <p>Therefore, it is unclear what scale of reticulation and storage Policy EI-P2 is seeking to regulate – is it only community scale or on-property scale.</p> <p>The lead in to the policy seeks that adverse effects are avoided remedied or mitigated so inclusion so ‘minimised’ is not needed</p>	
145.32	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<i>support</i>	retain
158.11	EI – Energy and Infrastructure	Policies	EI-P2 Managing adverse effects of regionally	<p>1. <i>Objective EI-03, pertaining to reverse sensitivity effects, is generally supported. We assume that the absence of a hyperlink to the “sensitive activities” definition is deliberate?</i></p>	
80.6	EI – Energy and Infrastructure	Policies	EI-P3 Adverse effects on regionally significant	<p>█ <i>supports the need to protect regionally significant infrastructure from adverse effects.</i></p> <p>█ <i>considers EI-P3 does not go far enough to protect from reverse sensitivity and proposes the following amendment (presuming the Draft Plan is amended to recognise its facilities as Regionally Significant Infrastructure):</i></p> <p>2. <i>for other regionally significant infrastructure, ensure new sensitive activities are appropriately located or designed so they do not compromise or constrain the safe, effective and efficient operation, maintenance,</i></p>	

				<p>repair or upgrading of any regionally significant infrastructure including the avoidance of reverse sensitivity effects on existing activities.</p> <p>If [REDACTED] Facilities are not recognised as regionally significant infrastructure, then it seeks amendment of this policy to recognise lifeline utilities as well as regionally significant infrastructure.</p>				
118.10	EI – Energy and Infrastructure	Policies	EI-P3 Adverse effects on regionally significant	<p>[REDACTED] generally supports Policy EI-P3, but seeks amendments to:</p> <p>1. clause (1)(a), as follows, to better reflect [REDACTED] preferred approach to the management of subdivision near the National Grid (as reflected in, and as a consequence of, feedback elsewhere):</p> <p>“a. avoiding incompatible activities, subdivision and development, including the establishment or expansion of activities sensitive to transmission lines in the National Grid Yard and avoiding subdivision, use and development that may compromise the operation, maintenance, repair, upgrading, renewal, or development of the National Grid Corridor; and ...”</p> <p>2. clause (1)(e), as follows, to properly give effect to Policy 10 of the National Policy Statement on Electricity Transmission that includes a requirement to avoid reverse sensitivity effects on the National Grid:</p> <p>“e. limiting managing activities, as far as reasonably practicable, to avoid the potential for reverse sensitivity effects on the National Grid; and ...”</p>				
141.85	EI – Energy and Infrastructure	Policies	EI-P3 Adverse effects on regionally significant	<table border="1"> <tr> <td>EI-P3 Adverse effects on RSI</td> <td>Oppose</td> <td> <p>The policy seeks to ‘protect’ the National Grid. This is inconsistent with higher order documents including the NPSET which has a policy to ‘recognise and provide for’ the National Grid.</p> <p>The NPSET seeks that incompatible activities are avoided to the extent reasonably practicable. This caveat should be included in EI-P3. Sensitive activities have a different threshold in</p> </td> </tr> </table>	EI-P3 Adverse effects on RSI	Oppose	<p>The policy seeks to ‘protect’ the National Grid. This is inconsistent with higher order documents including the NPSET which has a policy to ‘recognise and provide for’ the National Grid.</p> <p>The NPSET seeks that incompatible activities are avoided to the extent reasonably practicable. This caveat should be included in EI-P3. Sensitive activities have a different threshold in</p>	<p>Amend EI-P3 1) as follows:</p> <p>Recognise and provide for the safe and efficient operation, maintenance, upgrading, removal and development of the National Grid by:</p>
EI-P3 Adverse effects on RSI	Oppose	<p>The policy seeks to ‘protect’ the National Grid. This is inconsistent with higher order documents including the NPSET which has a policy to ‘recognise and provide for’ the National Grid.</p> <p>The NPSET seeks that incompatible activities are avoided to the extent reasonably practicable. This caveat should be included in EI-P3. Sensitive activities have a different threshold in</p>						

				<p>the NPSET so should be listed as a separate point in the policy.</p> <p>Access provisions should be limited to within the National Grid Yard or Corridor. It is not the role of the district plan to require access across private property to the National Grid – that is between [REDACTED] and the landowners.</p>	<p>a) Avoiding, to the extent reasonably practicable, incompatible subdivision use and development in the National Grid Yard and National Grid Corridor,</p> <p>b) Avoiding the establishment of sensitive activities in the National Grid Yard</p> <p>Ensuring that access to the National Grid is retained within the National Grid Yard and Corridor.</p>
145.33	EI – Energy and Infrastructure	Policies	EI-P3 Adverse effects on regionally significant	<i>Seek amendment – Policy should be rebalanced so that all RSI is provided for in 1, with national grid specific requirements folding in after that – i.e. start with the broad intent and then focus.</i>	<p>Suggested amendment is as follows:</p> <p>Ensure new sensitive activities are appropriately located or designed so they do not compromise or constrain the safe, effective and</p>

					<p>efficient operation, maintenance, repair or upgrading of any regionally significant infrastructure.</p> <p>Protect the safe and efficient operation, maintenance, upgrading, removal and development of the National Grid by: avoiding incompatible activities, subdivision and development, including the establishment or expansion of activities sensitive to transmission lines in the National Grid Yard and National Grid Corridor; and</p> <p>providing security of supply and/or maintaining the integrity of</p>
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					<p>National Grid assets; and</p> <p>maintaining ongoing access to conductors and support structures for maintenance and upgrading works; and minimising exposure to health and safety risks from the National Grid; and</p> <p>limiting, as far as practicable, potential for reverse sensitivity effects on the National Grid; and</p> <p>for other regionally significant infrastructure, ensure new sensitive activities are appropriately located or designed so they do not compromise or constrain the safe, effective</p>
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					and efficient operation, maintenance, repair or upgrading of any regionally significant infrastructure.		
158.12	EI – Energy and Infrastructure	Policies	EI-P3 Adverse effects on regionally significant	1. We support clause (2) of Policy EI-P3.	Retain		
83.12	EI – Energy and Infrastructure	Policies	Protect the safe and efficient operation, maintenance, upgrading, removal and development of the National Grid by: avoiding incompatible activities,	<p>██████████ support the intent of Objectives EI-O3 and Policy EI-P3 but note that in line with the definition of reverse sensitivity, it is not just new or sensitive activities that may cause reverse sensitivity effects but could be a range of activities, including intensification of existing activities.</p> <p>To this effect ██████████ seek EI-P3(2) is amended to apply to new or modified activities rather than just new sensitive activities.</p>			
49.16	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-41 The installation and upgrading of large-scale renewable electricity	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’	
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			generation activities		
49.100	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-41 The installation and upgrading of large	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.40	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R42 New electricity generation from a non-renewable source, except as provided for in EI-R22	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.143	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R42 New electricity generation from a non	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.47	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R36 Installation, maintenance, repair, upgrading and removal of new utility equipment for investigating	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’

			a site for suitability for renewable elec		
49.107	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R36 Installation, maintenance, repair, up	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.3	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R37 The installation, maintenance, upgrading and removal of a solar cell or an array of solar cells for small scale renewable electricity generat	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.153	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R37 The installation, maintenance, upgrad	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’

49.76	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R38 The installation, maintenance, upgrade	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
49.126	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R38 The installation, maintenance, upgrade	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
49.55	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R39 The installation, maintenance, upgrade	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
49.130	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R39 The installation, maintenance, upgrade	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
49.58	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R40 Solar hot water systems All	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	

49.133	EI – Energy and Infrastructure	Renewable Electricity Generation	EI-R40 Solar hot water systems All	<table border="1"> <tr> <td data-bbox="638 199 831 320"> Query </td> <td data-bbox="831 199 1807 320"> In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’ </td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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102.9	EI – Energy and Infrastructure	Rules		<p>██████ further recommend that provisions relating to water storage facilities are included in the Rural Zone provisions and in taking E1-29 to apply to all new water storage, ██████ seek that the Council review the Discretionary Activity Status afforded to new water storage for agricultural and horticultural activities.</p> <p><i>Water is necessary to any farming practice and has a major impact on farming productivity and viability. In an environment where water resourcing is becoming increasingly scarce and considering the direction of national regulation to pare back water allocation, we support the safe and efficient storage of water on farm and do not consider a blanket Discretionary Activity Status afforded to such initiatives, irrespective of scale, is appropriate risk-based or responsible management of a finite resource. As we saw over the last summer with much of the country, it is not always possible to destock animals in a drought. In Northland, stock drinking water had to be trucked into some properties, which was problematic when it coincided with New Zealand’s largest city also experiencing water shortages. Competition for drinking water resources will only increase with increasing effects of climate change.</i></p> <p><i>Stock drinking water is critical for basic animal welfare need. We strongly recommend that the Council assist farmers in making their systems more resilient against climate change and regulatory reductions in water availability.</i></p> <p><i>We propose a permitted activity pathway is provided for small scale water storage facilities with conditions relating to location, size, and other factors relating to safety and hazard mitigation. ██████ note that Freshwater Farm Plans will take into consideration related factors, including overland flow pathways and topography; and therefore farmers will already have the knowledge and tools available to them to inform a suitable location.</i></p>			
102.10	EI – Energy and	Rules		<p>██████ have concerns over the inclusion of provisions relating to storage of water for agricultural and horticultural activities in Part 2 District Wide Matters and in the Energy, Infrastructure and</p>			

	Infrastr ucture			<p><i>Transport chapter (EI) and in particular, EI-R29, EI-R27. It is important that farmers who will be affected by provisions like these are aware of them, and the structure of the dDP can facilitate that.</i></p> <p><i>Farmers are rarely impacted by infrastructure policy and are not likely to read the EI chapter. These provisions would be more appropriately located in Part 3 Area Specific Matters under Rural Zones as it is concerned with activities which relate solely to these zones and will be more intuitive to farmers and growers. Alternatively, a provision could be included in the GRUZ chapter which directs readers to the EI provisions to facilitate ease of use.</i></p>			
145.49	EI – Energy and Infrastr ucture	Rules	Note: For certain activities, consent may be requi	Support appropriate for this chapter to be standalone	retain		
49.39	EI – Energy and Infrastr ucture	Rules	EI-R15 Telecommu nications kiosk	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.142	EI – Energy and Infrastr ucture	Rules	EI-R15 Telecommu nications kiosk All z	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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145.59	EI – Energy and Infrastr ucture	Rules	EI-R15 Telecommu nications kiosk All z	Support	retain		
49.14	EI – Energy and Infrastr ucture	Rules	EI-R16 Telecommu nications or radiocommu nication	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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			activities (not otherwise provided for by another rule in EI-R15 to EI-R23 and not regulated by the		
49.98	EI – Energy and Infrastructure	Rules	EI-R16 Telecommunications or radiocommunicat	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
145.60	EI – Energy and Infrastructure	Rules	EI-R16 Telecommunications or radiocommunicat	Support	retain
49.59	EI – Energy and Infrastructure	Rules	EI-R1 Maintenance and repair, or removal of	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
49.134	EI – Energy and Infrastructure	Rules	EI-R1 Maintenance and repair, or removal of	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
83.5	EI – Energy and	Rules	All zones Activity status:	██████████	<i>are in general support of Rules EI-R1 - R4.</i> Retain rules EI-R1 - R4.

	Infrastructure		Permitted Where: PER-1 EI-S1 and EI-S2 are complied with. Activity status when compliance not achieved with PER-1: Restr		
49.17	EI – Energy and Infrastructure	Rules	EI-R10 Navigational aids, sensing and environmental monitoring equipment (including air quality and meteorological)	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
49.101	EI – Energy and Infrastructure	Rules	EI-R10 Navigational aids, sensing and enviro	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
49.5	EI – Energy and	Rules	EI-R11 New overhead lines and	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’

	Infrastr ucture		associated support structures that convey electricity below 110kV		
49. 155	EI – Energy and Infrastr ucture	Rules	EI-R11 New overhead lines and associated sup	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
118 .16	EI – Energy and Infrastr ucture	Rules	EI-R11 New overhead lines and associated sup	<p><i>Notwithstanding subsequent comments, ██████ considers that the activities status, standards and/or matters of discretion that apply to Rules EI-R11 and EI-R13 are ambiguous. Assuming that the standards in Rules EI-R12 and EI-R14 are intended to apply, ██████ considers these could be duplicated.</i></p> <p>██████ also considers that it is not clear why Rules EI-R11, EI-R13 and EI-R23 make a distinction between lines that convey electricity below 110kV and those at a voltage of 110kV and above. That is, it is not clear whether there is an adverse effect being managed, particularly when Standard EI-S1 manages the scale of any structures irrespective of voltage and Rule EI-19 manages electric and magnetic fields.</p> <p>██████ seeks a single rule for new lines with Standard EI-S1 being the means by which effects are managed.</p>	
145 .56	EI – Energy and Infrastr ucture	Rules	EI-R11 New overhead lines and associated sup	<p><i>There is an inconsistency in this provision. It is unusual that overhead electricity lines are permitted in all zones with no standards, but overhead telecommunication lines are only permitted in general rural and general industrial, and are subject to maximum height standard, otherwise become Restricted Discretionary under EI-R14.</i></p> <p><i>Electricity lines and telecommunication lines have the same visual effect.</i></p> <p><i>Suggest that EI-12 is deleted in its entirety, and EI-S11 is amended as follows:</i></p> <p><i>New overhead lines and associated support structures that convey telecommunications orelectricity below 110kV</i></p>	

141.87	EI – Energy and Infrastructure	Rules	EI-R11 New overhead lines and associated support	EI-R11 and EI-R13 New overhead lined and associated support structures that convey electricity below 110kV	<p>There are no conditions or activity status for EI-R11. It is unclear what standards would apply to the activity.</p> <p>It would appear that EI-R13 applies to the same activity and is RDA.</p> <p>The General Rural Zone should be included in EI-R13 to ensure that consideration is given to rural production activities.</p>		<p>EI-R13 should apply to the General Rural Zone</p> <p>Add a matter of discretion: effects on adjacent landowners</p>
49.41	EI – Energy and Infrastructure	Rules	EI-R12 New overhead telecommunication lines and associated support structures	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’		
49.144	EI – Energy and Infrastructure	Rules	EI-R12 New overhead telecommunication lines	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’		
145.57	EI – Energy and Infrastructure	Rules	EI-R12 New overhead telecommunication lines	<p><i>There is an inconsistency in this provision. It is unusual that overhead electricity lines are permitted in all zones with no standards, but overhead telecommunication lines are only permitted in general rural and general industrial, and are subject to maximum height standard, otherwise become Restricted Discretionary under EI-R14.</i></p> <p><i>Electricity lines and telecommunication lines have the same visual effect.</i></p>			

				<p><i>Suggest that EI-12 is deleted in its entirety, and EI-S11 is amended as follows:</i></p> <p><i>New overhead lines and associated support structures that convey telecommunications orelectricity below 110kV</i></p>		
49.32	EI – Energy and Infrastructure	Rules	EI-R17 Small cell units	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
49.182	EI – Energy and Infrastructure	Rules	EI-R17 Small cell units All zones A	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
145.61	EI – Energy and Infrastructure	Rules	EI-R17 Small cell units All zones A	<i>support</i>		retain
49.18	EI – Energy and Infrastructure	Rules	EI-R18 Other network utilities (including network utility buildings and enclosed substations) not provided for by another rule in EI-	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	

			R15 to EI-R23		
49.102	EI – Energy and Infrastructure	Rules	EI-R18 Other network utilities (including ne	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
49.19	EI – Energy and Infrastructure	Rules	EI-R19 Network utilities emitting electric and magnetic fields	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
49.103	EI – Energy and Infrastructure	Rules	EI-R19 Network utilities emitting electric a	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
118.19	EI – Energy and Infrastructure	Rules	EI-R19 Network utilities emitting electric a	██████ support Rule EI-R19 on the basis that the Rule is gives effect to Policy 9 of the National Policy Statement on Electricity Transmission and is consistent with the Regulations in the National Environmental Standards for Electricity Transmission Activities.	
49.43	EI – Energy and Infrastructure	Rules	EI-R2 Minor upgrading of underground infrast	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’
49.146	EI – Energy and	Rules	EI-R2 Minor upgrading of underground infrast	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’

	Infrastr ucture				
145.51	EI – Energy and Infrastr ucture	Rules	EI-R2 Minor upgrading of underground infrast	<i>The rule would benefit from a definition of Minor Upgrading</i>	
83.6	EI – Energy and Infrastr ucture	Rules	All zones Activity status: Permitted Activity status when compliance not achieved: Not applicable	██████████ are in general support of Rules EI-R1 - R4.	
49.30	EI – Energy and Infrastr ucture	Rules	EI-R20 Network utilities generating radiofrequency fields	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’
49.180	EI – Energy and Infrastr ucture	Rules	EI-R20 Network utilities generating radiofre	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’
49.88	EI – Energy and	Rules	EI-R21 New emergency or		

	Infrastr ucture		permanent back-up el	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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80.8	EI – Energy and Infrastr ucture	Rules	EI-R21 New emergency or permanent back-up el	<p>█████ relies on permanent emergency back-up generators to enable ██████ facilities to continue operating when regular power supplies fail. ██████ role as a Lifeline Utility means that it is essential that ██████ is able to operate these generators when necessary.</p>	Retain rule as proposed.		
145.62	EI – Energy and Infrastr ucture	Rules	EI-R21 New emergency or permanent back-up el	<p>Solar power can be utilities as a back up power source. This provision is supported with an amendment to clearly provide solar power</p>			
49.138	EI – Energy and Infrastr ucture	Rules	EI-R21 New emergency or permanent back-up electricity generation (including any associated energy storage batteries) for a network utility which is	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.56	EI – Energy and Infrastructure	Rules	EI-R3 New underground infrastructure (include)	<table border="1"> <tr> <td data-bbox="638 201 831 320">Query</td> <td data-bbox="831 201 1807 320">In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.131	EI – Energy and Infrastructure	Rules	EI-R3 New underground infrastructure (include)	<table border="1"> <tr> <td data-bbox="638 379 831 499">Query</td> <td data-bbox="831 379 1807 499">In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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83.7	EI – Energy and Infrastructure	Rules	All zones Activity status: Permitted Activity status when compliance not achieved: Not applicable	████████ are in general support of Rules EI-R1 - R4.	Retain rules EI-R1 - R4.		
49.50	EI – Energy and Infrastructure	Rules	EI-R4 Minor upgrading and upgrading of above ground network utilities not provided for by another rule in this chapter	<table border="1"> <tr> <td data-bbox="638 941 831 1061">Query</td> <td data-bbox="831 941 1807 1061">In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.125	EI – Energy and Infrastructure	Rules	EI-R4 Minor upgrading and upgrading of above	<table border="1"> <tr> <td data-bbox="638 199 831 320"> Query </td> <td data-bbox="831 199 1807 320"> In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’ </td> </tr> </table>		Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’		
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118.13	EI – Energy and Infrastructure	Rules	EI-R4 Minor upgrading and upgrading of above	<p>█████ generally supports Rule EI-R4 to the extent that the standards included in the rule generally reflect the same thresholds for a permitted activity that are included in the National Environmental Standards for Electricity Transmission Activities.</p> <p>█████ seeks that the matters of discretion that apply in situations where compliance is not achieved with PER-11 is amended to refer to the functional needs and operational needs of, and benefits derived from, the network utility as follows:</p> <p>“Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the matters of discretion of any infringed standard; and 2. the functional needs and operational needs of, and benefits derived from, the network utility, including the potential impact on the levels of service or health and safety if the work is not undertaken.” <p>█████ considers that this matter of discretion should be included in respect of all restricted discretionary activity rules that relate to network utilities/infrastructure.</p> 					
141.86	EI – Energy and Infrastructure	Rules	EI-R4 Minor upgrading and upgrading of above	<table border="1"> <tr> <td data-bbox="638 976 792 1383"> EI-R4 Minor upgrading </td> <td data-bbox="792 976 913 1383"> Support in part </td> <td data-bbox="913 976 1355 1383"> EI-R4 appears to set out the requirements for minor upgrading, in lieu of a definition. ██████ seeks that the reconductoring of a line does not increase the voltage, unless the line was originally designed to operate at the higher voltage. It is important for land owners that they are not adversely affected when the voltage of a line increases, thereby necessitating increased setbacks distances as set out in NZECP34:2001 </td> </tr> </table>		EI-R4 Minor upgrading	Support in part	EI-R4 appears to set out the requirements for minor upgrading, in lieu of a definition. ██████ seeks that the reconductoring of a line does not increase the voltage, unless the line was originally designed to operate at the higher voltage. It is important for land owners that they are not adversely affected when the voltage of a line increases, thereby necessitating increased setbacks distances as set out in NZECP34:2001	Add an additional clause to EI-R4: as PER 12 reconductoring of a line does not increase the voltage, unless the line was originally designed to operate at the higher voltage.
EI-R4 Minor upgrading	Support in part	EI-R4 appears to set out the requirements for minor upgrading, in lieu of a definition. ██████ seeks that the reconductoring of a line does not increase the voltage, unless the line was originally designed to operate at the higher voltage. It is important for land owners that they are not adversely affected when the voltage of a line increases, thereby necessitating increased setbacks distances as set out in NZECP34:2001							

<p>145.52</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules</p>	<p>EI-R4 Minor upgrading and upgrading of above</p>	<p><i>Rule would benefit from a definition of Minor Upgrading The rule should be for minor upgrading and not upgrading as it is confusing.</i></p>	<p>Suggest the following amendment to the activity heading</p> <p>Minor upgrading and upgrading of above ground network utilities not provided for by another rule in this chapter.</p> <p>Providing a definition of 'minor upgrading'.</p>
<p>83.8</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules</p>	<p>All zones Activity status: Permitted Where: PER-1 The realignment, relocation or replacement of a line, pipe (excluding a</p>	<p>██████████ <i>are in general support of Rules EI-R1 - R4.</i></p>	<p>Retain rules EI-R1 - R4.</p>

			liquid petroleum pipelin				
49.22	EI – Energy and Infrastructure	Rules	EI-R5 Vehicle access tracks for network utilities, including ancillary access tracks	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.148	EI – Energy and Infrastructure	Rules	EI-R5 Vehicle access tracks for network util	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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118.14	EI – Energy and Infrastructure	Rules	EI-R5 Vehicle access tracks for network util	██████ supports Rule EI-R5 on the basis that the rule provides for a permitted activity for vehicle access tracks for network utilities.			
145.34	EI – Energy and Infrastructure	Rules	EI-R5 Vehicle access tracks for network util	support	retain		
49.34	EI – Energy and Infrastructure	Rules	EI-R6 Above ground customer connections	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.183	EI – Energy and Infrastructure	Rules	EI-R6 Above ground customer connections	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
145.53	EI – Energy and Infrastructure	Rules	EI-R6 Above ground customer connections	Support		
49.44	EI – Energy and Infrastructure	Rules	EI-R7 Temporary network utilities, including generators	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
49.163	EI – Energy and Infrastructure	Rules	EI-R7 Temporary network utilities, including	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
80.7	EI – Energy and Infrastructure	Rules	EI-R7 Temporary network utilities, including		█████ notes it operates a permanent emergency back-up generator which it considers would be covered by Rule EI-R21.	
145.54	EI – Energy and Infrastructure	Rules	EI-R7 Temporary network utilities, including	Support		retain

<p>49.52</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules</p>	<p>EI-R8 Substations (including switching stations) and energy storage batteries not enclosed within a building</p>	<table border="1"> <tr> <td data-bbox="638 199 831 320"> <p>Query</p> </td> <td data-bbox="831 199 1807 320"> <p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</p> </td> </tr> <tr> <td colspan="2" data-bbox="638 320 1807 596"></td> </tr> </table>	<p>Query</p>	<p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</p>			
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<p>49.137</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules</p>	<p>EI-R8 Substations (including switching stati</p>	<table border="1"> <tr> <td data-bbox="638 609 831 730"> <p>Query</p> </td> <td data-bbox="831 609 1807 730"> <p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</p> </td> </tr> <tr> <td colspan="2" data-bbox="638 730 1807 782"></td> </tr> </table>	<p>Query</p>	<p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</p>			
<p>Query</p>	<p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</p>								
<p>118.15</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules</p>	<p>EI-R8 Substations (including switching stati</p>	<p>██████ generally supports Rule EI-R8 on the basis that the Rule provides for substations as a permitted activity where the scale is managed by a range of standards. ██████ also supports the restricted discretionary activity status that applies in situations where compliance with the standards is not achieved.</p> <p>██████ seeks that the matters of discretion that apply in situations where compliance is not achieved with PER-4 is amended to refer to the functional needs and operational needs of, and benefits derived from, the network utility as follows:</p> <p>“Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the matters of discretion of any infringed standard; and 2. the functional needs and operational needs of, and benefits derived from, the network utility, including the potential impact on the levels of service or health and safety if the work is not undertaken.” <p>██████ considers that this matter of discretion should be included in respect of all restricted discretionary activity rules that relate to network utilities/infrastructure.</p>					

49.23	EI – Energy and Infrastructure	Rules	EI-R9 New network utilities within existing fully enclosed buildings	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
49.147	EI – Energy and Infrastructure	Rules	EI-R9 New network utilities within existing	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
145.55	EI – Energy and Infrastructure	Rules	EI-R9 New network utilities within existing	<i>Support</i>		Retain
49.54	EI – Energy and Infrastructure	Rules	EI-R13 New overhead lines and associated support structures that convey electricity below 110kV	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
49.129	EI – Energy and Infrastructure	Rules	EI-R13 New overhead lines and associated sup	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	

118.17	EI – Energy and Infrastructure	Rules	EI-R13 New overhead lines and associated sup	<p>Notwithstanding subsequent comments, ██████████ considers that the activities status, standards and/or matters of discretion that apply to Rules EI-R11 and EI-R13 are ambiguous. Assuming that the standards in Rules EI-R12 and EI-R14 are intended to apply, ██████████ considers these could be duplicated.</p> <p>██████████ also considers that it is not clear why Rules EI-R11, EI-R13 and EI-R23 make a distinction between lines that convey electricity below 110kV and those at a voltage of 110kV and above. That is, it is not clear whether there is an adverse effect being managed, particularly when Standard EI-S1 manages the scale of any structures irrespective of voltage and Rule EI-19 manages electric and magnetic fields.</p> <p>██████████ seeks a single rule for new lines with Standard EI-S1 being the means by which effects are managed.</p>			
49.74	EI – Energy and Infrastructure	Rules	EI-R14 New overhead telecommuni cations lines	<table border="1" data-bbox="638 550 1807 671"> <tr> <td data-bbox="638 550 831 671">Query</td> <td data-bbox="831 550 1807 671">In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’	
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49.111	EI – Energy and Infrastructure	Rules	EI-R14 New overhead telecommuni cations lines	<table border="1" data-bbox="638 734 1807 855"> <tr> <td data-bbox="638 734 831 855">Query</td> <td data-bbox="831 734 1807 855">In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’	
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145.58	EI – Energy and Infrastructure	Rules	EI-R14 New overhead telecommuni cations lines	<p><i>There is an inconsistency in this provision. It is unusual that overhead electricity lines are permitted in all zones with no standards, but overhead telecommunication lines are only permitted in general rural and general industrial, and are subject to maximum height standard, otherwise become Restricted Discretionary under EI-R14.</i></p> <p><i>Electricity lines and telecommunication lines have the same visual effect.</i></p> <p><i>Suggest that EI-12 is deleted in its entirety, and EI-S11 is amended as follows:</i></p> <p><i>New overhead lines and associated support structures that convey telecommunications orelectricity below 110kV</i></p>			

49.8	EI – Energy and Infrastructure	Rules	EI-R22 Telecommunications lines, cabinets, poles and new antennas regulated by the NESTF that do not meet the permitted activity standards in Regula	<table border="1"> <tr> <td data-bbox="638 199 831 316"> Query </td> <td data-bbox="831 199 1807 316"> In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’ </td> </tr> <tr> <td colspan="2" data-bbox="638 316 1807 724"> </td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			
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49.114	EI – Energy and Infrastructure	Rules	EI-R22 Telecommunications lines, cabinets, p	<table border="1"> <tr> <td data-bbox="638 737 831 853"> Query </td> <td data-bbox="831 737 1807 853"> In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’ </td> </tr> <tr> <td colspan="2" data-bbox="638 853 1807 909"> </td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			
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145.63	EI – Energy and Infrastructure	Rules	EI-R22 Telecommunications lines, cabinets, p	<i>Support</i>	retain				
49.46	EI – Energy and Infrastructure	Rules	EI-R23 Electricity lines and associated support structures (including poles and	<table border="1"> <tr> <td data-bbox="638 1104 831 1220"> Query </td> <td data-bbox="831 1104 1807 1220"> In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’ </td> </tr> <tr> <td colspan="2" data-bbox="638 1220 1807 1367"> </td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			
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			towers) that convey electricity of 110kV or above				
49.105	EI – Energy and Infrastructure	Rules	EI-R23 Electricity lines and associated supp	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’		
118.18	EI – Energy and Infrastructure	Rules	EI-R23 Electricity lines and associated supp		<p><i>Notwithstanding subsequent comments, ██████ considers that the activities status, standards and/or matters of discretion that apply to Rules EI-R11 and EI-R13 are ambiguous. Assuming that the standards in Rules EI-R12 and EI-R14 are intended to apply, ██████ considers these could be duplicated.</i></p> <p>██████ also considers that it is not clear why Rules EI-R11, EI-R13 and EI-R23 make a distinction between lines that convey electricity below 110kV and those at a voltage of 110kV and above. That is, it is not clear whether there is an adverse effect being managed, particularly when Standard EI-S1 manages the scale of any structures irrespective of voltage and Rule EI-19 manages electric and magnetic fields.</p> <p>██████ seeks a single rule for new lines with Standard EI-S1 being the means by which effects are managed.</p>		
141.88	EI – Energy and Infrastructure	Rules	EI-R23 Electricity lines and associated supp	EI-R23 Electricity lines and associated support structures that convey electricity of 110kV or above	Support in part	The electricity network is generally hosted on private property.	Amend EI-R23 by Adding an extra matter of discretion: effects on landowners
118.11	EI – Energy and Infrastructure	Rules	General		██████ considers that the purpose of the rules heading “Rules for Telecommunication and radiocommunication activities” is not clear. That is, it is not clear whether or which of the subsequent rules apply to telecommunications and radiocommunication activities. For instance, whether Rule EI-R19 (electric and magnetic fields) is for telecommunication and radiocommunication or if it applies to all network utilities.		
118.12	EI – Energy and	Rules	General		██████ considers that it is critical that the District Plan is clear in respect of which rules apply to network utilities/infrastructure. ██████ considers that the most succinct approach is for such rules to be located		

	Infrastr ucture			<i>in a single chapter of the Plan. For this reason, ██████ generally supports the EI Rules introductory text to the extent that this introduction provides clarity in respect of which rules apply.</i>			
145.50	EI – Energy and Infrastr ucture	Rules	General	<i>Rules and standards related to Telecommunications are supported subject to any requested amendments</i>			
49.31	EI – Energy and Infrastr ucture	Rules for amateur radio configur ations	EI-R43 Amateur radio configuratio ns	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’		
49.181	EI – Energy and Infrastr ucture	Rules for amateur radio configur ations	EI-R43 Amateur radio configuratio ns A	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’		
141.92	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R34 Sensitive activities, including withi	EI-R35 Reticulation and storage of water for irrigation purposes within the National Grid Yard	Oppose	<p>Reticulation and storage of water within the National Grid Yard was addressed in EI-R29 with changes sought above.</p> <p>EI-R35 would mean that even simple on-orchard reticulation of water for irrigation could not occur in the National Grid Yard without a Non-complying consent. This is not effects based. The issue is whether storage ponds are limiting access to the National Grid structures and this can be addressed through the</p>	Delete EI-R35

						matter of discretion sought above.		
49.71	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R34 Sensitive activities, including withi	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			
49.108	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R34 Sensitive activities, including withi	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			
118.25	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R34 Sensitive activities, including withi	<p>██████ assumes that Rule EI-R34 provides for sensitive activities in the National Grid Yard as a non-complying activity. ██████ supports this approach and considers that the Rule gives effect to Policy 11 of the National Policy Statement on Electricity Transmission. ██████ seeks the following amendments to clarify the activity status:</p> <p><i>“EI-R34 Sensitive activities, including within an existing building or the erection of buildings for sensitive activities, within the National Grid Yard</i></p> <p><i>Activity status: Non-complying</i></p> <p><i>Activity status when compliance not achieved: Not applicable”</i></p>				
49.67	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R35 The reticulation and storage of water	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			
49.122	EI – Energy and	Rules for network utilities -	EI-R35 The reticulation and storage of water	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’			

	Infrastr ucture	three waters			
68.16	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R35 The reticulation and storage of water	<i>The inclusion of reticulation needs additional work. For example many irrigation races are currently present in the National Grid Yard.</i>	
118.26	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R35 The reticulation and storage of water	<i>Subject to the amendments to Rule EI-R30 sought by ██████████ particularly in respect of the ‘default’ activity status, ██████████ considers that the management of irrigation activities in the National Grid Yard is adequately managed by Rule EI-R30 such that Rule EI-R35 is not necessary. Subject to relief sought elsewhere, ██████████ therefore seeks the deletion of Rule EI-R35 in its entirety.</i>	
49.53	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R29 New open drains, or extension or expa	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’
49.128	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R29 New open drains, or extension or expa	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████████ requests that the following be added ‘Including historic and cultural heritage’
108.9	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R29 New open drains, or extension or expa	<p><i>As outlined in ██████████ comments made under Objective EI-02, and Rules EI-24, EI-27 and EI-28, ██████████ seeks that the district plan should not differentiate between the provision water supply infrastructure on the basis of the purpose for which water is being supplied, or whether it is for agriculture/horticulture or urban supply.</i></p> <p><i>██████████ acknowledges that construction of new infrastructure networks can have adverse environmental effects. It is difficult to see, however why construction of new inground infrastructure for horticulture and agriculture under Rule EI-R29 requires a higher level of scrutiny (as a discretionary activity) than construction and upgrading of above ground infrastructure under Rule EI-R28 (restricted discretionary).</i></p>	

				<p>█████ considers that it is more appropriate for any differentiation to be on the basis of:</p> <ul style="list-style-type: none"> • whether the proposed infrastructure is underground, in-ground or above ground; and • in the case of maintenance repair and minor upgrading of existing in-ground and above ground networks whether the work is within or outside the existing envelope of effects. <p>Accordingly █████ has proposed amendments to provide consistency of approach and the status of in-ground and above ground activities in rules EI-27 and EI-28.</p> <p>These negate the need for Rule EI-29 and █████ therefore seeks its deletion.</p>			
118.20	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R29 New open drains, or extension or expa	<p>█████ considers that the heading “Rules for the National Grid” may be located incorrectly, so that it appears as if Rule EI-R29 is a rule for the National Grid.</p>			
49.69	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R24 Construction, maintenance, repair min	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ █████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ █████ requests that the following be added ‘Including historic and cultural heritage’	
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49.120	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R24 Construction, maintenance, repair min	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ █████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ █████ requests that the following be added ‘Including historic and cultural heritage’	
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108.8	EI – Energy	Rules for network	EI-R24 Constructio	<p>█████ supports Rule EI-R24.</p>			

	and Infrastructure	utilities - three waters	n, maintenance, repair min		
49.33	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R25 New water, wastewater and stormwater connections to existing public networks	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.104	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R25 New water, wastewater and stormwater	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.7	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R26 Rainwater collection systems for non-potable use	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.115	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R26 Rainwater collection systems for non-	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’
49.72	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R27 Maintenance, repair, minor upgrade an	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’

<p>49.109</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules for network utilities - three waters</p>	<p>EI-R27 Maintenance, repair, minor upgrade an</p>	<table border="1"> <tr> <td data-bbox="638 199 831 320"> <p>Query</p> </td> <td data-bbox="831 199 1807 320"> <p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’</p> </td> </tr> </table>	<p>Query</p>	<p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’</p>	
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<p>108.6</p>	<p>EI – Energy and Infrastructure</p>	<p>Rules for network utilities - three waters</p>	<p>EI-R27 Maintenance, repair, minor upgrade an</p>	<p>1 For the reasons outlined in the [REDACTED] submission on EI-P2, [REDACTED] considers seeks that:</p> <ul style="list-style-type: none"> the wording of the rule be amended to reflect that the rule applies to maintenance, repair and minor upgrading of existing inground and above ground systems, open drains and channels, pipes, water reservoirs, storage ponds and ancillary facilities and structures for the reticulation and storage of water (whether it is for urban and horticultural/agricultural water systems). <p>2 [REDACTED] also seeks that either:</p> <ul style="list-style-type: none"> the draft PER 1 and PER 2 standards in Rule EI-R27 are replaced with the PER 1 standard that applies to Rule EI-R24; or the draft PER 1 and PER 2 standards in Rule EI-R27 are replaced with a new PER 1 standard which only requires maintenance, repair and minor upgrading that is outside of the existing building envelope, to comply with the building height, setback and height in relation to boundary for the zone. <p>Reasons:</p> <ul style="list-style-type: none"> [REDACTED] 			

49.49	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R30 Buildings or structures within the National Grid Yard	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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49.124	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R30 Buildings or structures within the Na	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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118.21	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R30 Buildings or structures within the Na	<p>██████ generally supports Rule EI-R30 but seeks amendments as follows:</p> <p><i>“Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>PER-1</i></p> <p><i>In Under the National Grid Yard transmission lines:</i></p> <p><i>a. any alteration or addition to an existing building or structure for a sensitive activity does not involve an increase in the building height for network utility structures or footprint; or</i></p> <p><i>b. it is a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); or</i></p>			

c. it is a non-habitable building or structure for farming activities in the Rural Zones, including yards for milking/dairy sheds and artificial crop protection structures (but does not include any building for produce packing, intensive indoor primary production, commercial greenhouses or milking/dairy sheds);

d. it is not for the storage and/or handling of hazardous substances with explosive or flammable intrinsic properties; or

d. it is a yard for milking/dairy sheds; or

e. it is an artificial crop protection and support structure; and

PER-2

In the National Grid Yard Around the National Grid support structures, the building or structure is located at least 12m from the outer visible edge of any National Grid tower or pole and associated stay wire, unless it does not permanently physically obstruct existing vehicular access to a National Grid support structure and it is one of the following:

a. a network utility undertaken by a network utility operator (other than for the reticulation and storage of water in canals, dams or reservoirs including for irrigation purposes); or

ab. a fence no greater than 2.5m high; and that is no closer than 5m to the nearest National Grid pole; or no closer than 6m to the nearest National Grid tower; or

b. an artificial crop protection structure or crop support structure not exceeding 2.5 metres in height and located at least 8 metres from a National Grid transmission line pole that is removable or temporary to allow a clear working space of 12 metres from the pole for maintenance and allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; or

ce. a building or structure where [REDACTED] has given written approval in accordance with clause 2.4.1 of NZECP34:2001; and

PER-3

Around National Grid support structures, it is an artificial crop protection or crop support structure between 8m and 12m from a pi-pole or single pole support structure and any associated guy wire (but not a tower), that:

- 2. is not more than 2.5m high;*
- 3. is removable or temporary, to allow a clear working space 12m from the pole when necessary for maintenance and emergency repair purposes; and*
- 4. allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane*

PER-X

The building or structure meets the requirements of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP24:2001). ...”

██████████ does not support the ‘default’ to discretionary activity status in situations where the rule requirements/standards are not met. This is because discretionary activity status is not sufficient or appropriate to give effect to Policies 10 and 11 of the National Policy Statement on Electricity Transmission or Policy 16.3.4 of the Canterbury Regional Policy Statement and a greater level of scrutiny is appropriate and achieved by the statutory test that applies to non-complying activities under section 104D of the RMA. In this regard it is noted that the High Court in 5 ██████████ v Auckland Council ██████████ ██████████ considered Policy 10 and concluded:

“[85] Policy 10, though subject to the “reasonably possible” proviso, is, in my judgment, relatively prescriptive. It requires that decision-makers “must” manage activities to avoid reverse sensitivity effects on the electricity transmission network, and “must” ensure that the operation, maintenance, upgrading and development of the electricity transmission network is not compromised. What is sought to be protected is the national electricity transmission grid – an asset which the NPSET recognises is of national significance. A mandatory requirement to ensure that an asset of national significance is not compromised is, in my judgment, a relatively strong directive.”

██████████ therefore seeks that the Rule EI-R30 is amended as follows:

				<i>“Activity status when compliance not achieved with PER-1, PER-2 or PER-3: Discretionary Non-complying”</i>			
141.89	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R30 Buildings or structures within the Na	EI- R30 Buildings or structure within the National Grid Yard	Oppose in part	<p>Reticulation and storage of water is addressed in EI-R29 so the words in brackets are not required.</p> <p>Clause e should provide for artificial crop protection structures and/or crop support structures as some situations may only have one sort of structure.</p>	<p>PER-1 b) Deleted words in brackets</p> <p>PER-1 e) amend to ‘or’ it is an artificial crop protection structure AND/OR crop support structure</p> <p>PER2 a) delete words in brackets</p> <p>PER-3 Add clause from PER-2 e) to PER-3 so that the written approval also applies to PER-3 as an alternative to the conditions a-c.</p> <p>There should be access to the pole but a landowner should not have to provide ‘all weather access’.</p>
49.15	EI – Energy and	Rules for network utilities -	EI-R31 Earthworks for National Grid support	Query		<p>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’</p>	

	Infrastr ucture	three waters	poles, stay wires and support towers within the National Grid Yard				
49.99	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R31 Earthworks for National Grid support	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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118.22	EI – Energy and Infrastr ucture	Rules for network utilities - three waters	EI-R31 Earthworks for National Grid support	<p>█████ generally supports Rule EI-R31 but seeks amendments as follows:</p> <p><i>“EI-R31</i></p> <p><i>Earthworks and the disturbance of land for the installation of fence posts for National Grid support poles, stay wires and support towers within the National Grid Yard</i></p> <p><i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>PER-1</i></p> <p><i>For National Grid support poles and any stay wires, the The depth of the earthworks or land disturbance is:</i></p> <p><i>a. no greater than 300mm within 12 metres of the outer visible edge of a foundation of a National Grid transmission line tower or pole; and</i></p> <p><i>b. the work does not compromise the stability of a National Grid transmission line tower or pole; except that</i></p>			

c. clauses (a) and (b) do not apply to:

i. the repair or resealing of a road, footpath, driveway or farm track.

ii. excavation of a vertical hole, not exceeding 500mm in diameter, that is more than 1.5m from outer visible edge of foundation of a National Grid transmission line pole or stay wire.

2.2m of the pole or stay wire; or

b. no greater than 750mm between 2.2m and 5m of the pole or stay wire; and

PER-2

For National Grid support towers (including any tubular steel tower that replaces a steel lattice tower), the depth of the earthworks is:

a. no greater than 300mm within 6m of the outer edge of the visible foundation of the tower; or

b. no greater than 3m between 6m and 12m of the outer edge of the visible foundation of the tower.”

██████████ does not support the ‘default’ to restricted discretionary activity status in situations where the rule requirements/standards are not met. This is because restricted discretionary activity status is not sufficient or appropriate to give effect to Policy 10 of the National Policy Statement on Electricity Transmission or Policy 16.3.4 of the Canterbury Regional Policy Statement and a greater level of scrutiny is appropriate and achieved by the statutory test that applies to non-complying activities under section 104D of the RMA. In this regard it is noted that the High Court in 5 ██████████ v Auckland Council ██████████ ██████████ considered Policy 10 and concluded:

“[85] Policy 10, though subject to the “reasonably possible” proviso, is, in my judgment, relatively prescriptive. It requires that decision-makers “must” manage activities to avoid reverse sensitivity effects on the electricity transmission network, and “must” ensure that the operation, maintenance, upgrading and development of the electricity transmission network is not compromised. What is sought to be protected is

				<p><i>the national electricity transmission grid – an asset which the NPSET recognises is of national significance. A mandatory requirement to ensure that an asset of national significance is not compromised is, in my judgment, a relatively strong directive.”</i></p> <p>██████ also notes that failure to comply with these rule requirements/standards will likely mean that the activity will also not comply with NZECP34:2001 and as such cannot be undertaken. ██████ therefore seeks that the Rule EI-R31 is amended as follows:</p> <p><i>“Activity status when compliance not achieved with PER-1 or PER-2: Restricted Discretionary Non-complying</i></p> <p><i>Matters over which discretion is restricted:</i></p> <ol style="list-style-type: none"> <i>1. effects on the operation, maintenance, upgrading and development of the National Grid; and</i> <i>2. the risk to the structural integrity of the National Grid support structure(s) ; and</i> <i>3. any impact on the ability to access the National Grid; and</i> <i>4. the risk of electrical hazards affecting public or individual safety and the risk of property damage; and</i> <p><i>5. the outcome of any consultation with the owner and operator of the National Grid.”</i></p>			
141.90	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R31 Earthworks for National Grid support	<table border="1"> <tr> <td>EI-R31 Earthworks for national Grid support poles within the National Grid Yard</td> <td> <p>It is unclear if this rule is to provide for the National Grid structures or other earthworks undertaken within the National Grid Yard.</p> <p>Earthworks within the National Grid yard should comply with NZECP34:2001</p> </td> </tr> </table>	EI-R31 Earthworks for national Grid support poles within the National Grid Yard	<p>It is unclear if this rule is to provide for the National Grid structures or other earthworks undertaken within the National Grid Yard.</p> <p>Earthworks within the National Grid yard should comply with NZECP34:2001</p>	Amend to provide for earthworks in the National Grid Yard that meet standards in NZECP34:2001.
EI-R31 Earthworks for national Grid support poles within the National Grid Yard	<p>It is unclear if this rule is to provide for the National Grid structures or other earthworks undertaken within the National Grid Yard.</p> <p>Earthworks within the National Grid yard should comply with NZECP34:2001</p>						
49.4	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R28 Construction, maintenance, repair and upgrading of	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ██████ requests that the following be added ‘Including historic and cultural heritage’	
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			aboveground water supply, wastewater systems, and stormwater infrastructure				
49.154	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R28 Construction, maintenance, repair and	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ [REDACTED] requests that the following be added ‘Including historic and cultural heritage’	
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108.7	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R28 Construction, maintenance, repair and	<p><i>For the reasons outlined in its comments under EI-P2, [REDACTED] seeks the amendment of wording of Rule EI-R28 so it applies to the construction or upgrading of all in-ground or above ground water system infrastructure (whether for urban or agriculture/horticulture water supply purposes).</i></p> <p><i>Instead it seeks that the wording of EI-28 is amended to read:</i></p> <p><i>Construction and upgrading of in-ground and above ground water supply, wastewater systems and stormwater infrastructure.</i></p> <p><i>Activity Status: Restricted Discretionary</i></p> <p><i>Matters of discretion is restricted to:</i></p> <p><i>1-3 as per draft plan.</i></p> <p><i>New addition - any adverse impacts on the character and qualities of the surrounding area.</i></p> <p><i>This approach leads to the following framework for the rules applying to all water infrastructure.</i></p>			

				<p><i>R24 - permitting construction, maintenance, repair, upgrading and minor upgrading of underground water supply system infrastructure, that meet the PER 1 standard, with failure to meet the standard resulting in restricted discretionary activity status</i></p> <p><i>R27 - permitting the repair, maintenance and minor upgrading of in-ground and above ground water supply system infrastructure, that is carried out within the existing building envelope, or complies with the surrounding zone (building height, height in relation to boundary and setback) requirements, with failure to meet these requirements resulting in restricted discretionary activity status.</i></p> <p><i>R28 - requiring a restricted discretionary consent for the construction and upgrading of inground and above ground water supply infrastructure (whether for urban or agricultural/horticultural purposes).</i></p> <p><i>Deletion of EI-R29</i></p> <p>██████ considers his approach is consistent with policies EI-P1 to P3 as it:</p> <ul style="list-style-type: none"> <i>applies a consistent approach to the potential effects of each underground, in ground and above ground water infrastructure rather than differentiating on the basis of ownership, or the proposed use of the water being supplied by the infrastructure;</i> <i>considers the operational needs and requirements of water network utilities;</i> <i>provides for the assessment of scale and potential impact of new above ground and in ground water system infrastrucutre on the character and quality of surrounding environment.</i> 			
49.80	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R32 New sensitive activities, including t	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’	
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49.106	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R32 New sensitive activities, including t	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’	
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118.23	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R32 New sensitive activities, including t	<p>██████ opposes Rule EI-R32 on the basis that ████████ does not seek to regulate sensitive activities within the National Grid Subdivision Corridor, but only in the National Grid Yard. Sensitive activities in the National Grid Yard are managed by Rule EI-R34 and therefore ████████ considers that Rule EI-32 can be deleted in its entirety.</p>					
141.91	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R32 New sensitive activities, including t	<table border="1"> <tr> <td>EI-R32 New sensitive activities in the National Grid Corridor</td> <td>Oppose</td> <td>The rule should apply to the National Grid Yard – not the National Grid Corridor. The Corridor is designed to manage subdivision not land use.</td> </tr> </table>	EI-R32 New sensitive activities in the National Grid Corridor	Oppose	The rule should apply to the National Grid Yard – not the National Grid Corridor. The Corridor is designed to manage subdivision not land use.		Amend ‘Corridor’ to ‘Yard’.
EI-R32 New sensitive activities in the National Grid Corridor	Oppose	The rule should apply to the National Grid Yard – not the National Grid Corridor. The Corridor is designed to manage subdivision not land use.							
49.51	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R33 Subdivision of land within the National Grid Corridor	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’			
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49.127	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R33 Subdivision of land within the Nation	<table border="1"> <tr> <td>Query</td> <td>In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’</td> </tr> </table>	Query	In these rules, where the matters of discretion state ‘the impact on the character and qualities of the surrounding area’ ████████ requests that the following be added ‘Including historic and cultural heritage’			
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118.24	EI – Energy and Infrastructure	Rules for network utilities - three waters	EI-R33 Subdivision of land within the Nation	<p>██████ generally supports Rule EI-R33, including the restricted discretionary activity status; the matters over which discretion is restricted; and the default to non-complying activity status.</p> <p>That said, ████████ seeks the inclusion of a further standard. as follows, in order to fully give effect to Policy 10 of the NPSET:</p> <p>“RDIS-2</p> <p>Existing vehicle access to National Grid assets is maintained.”</p>					

145.64	EI – Energy and Infrastructure	Standards	EI-S1 Maximum structure height for network util	<i>General support – however seek that the maximum structure height is at least 5m above the permitted zone height so that all facilities can project above the zones in which they are located. This prevents buildings from disrupting signal and therefore improves the efficacy of the antenna.</i>	Amended so the maximum structure height is at least 5m above the permitted zone height
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