

Copy of Aurora's Submission and further Submission

FORM 5
SUBMISSION ON PROPOSED QUEENSTOWN LAKES DISTRICT PLAN (PART ONE) UNDER
CLAUSE 6 OF THE FIRST SCHEDULE,
RESOURCE MANAGEMENT ACT 1991

To: Queenstown Lakes District Council
Private Bag 50072
QUEENSTOWN 9348

Submission on: Submissions on the Proposed Queenstown
Lakes District Plan (Part One) August 2015

Name: Aurora Energy Limited
Address: PO Box 1404,
DUNEDIN 9054

1. **This is a submission on the following proposed policy statement: Proposed Queenstown Lakes District Plan (Part One) (“Proposed Plan”).**
2. **Aurora Energy Limited (“Aurora”) could not gain an advantage in trade competition through this submission.**
3. **Overall issues that have determined the approach of Aurora in preparing submissions on the Proposed Plan are outlined below and attached as Annexure One.**

About Aurora

Aurora depends upon, and fully supports, the principles of sustainable management and efficient use of resources as outlined in Part 2 of the Resource Management Act (“the RMA”). Aurora has particular interests in ensuring that the Proposed Plan enables the continued and efficient operation of its Regionally Significant Infrastructure, as well as generally ensuring that other existing and new Regionally Significant Infrastructure within the District is adequately provided for. Aurora is supportive of the Queenstown Lakes District Council’s notified Proposed District Plan; however we do have some suggested modifications that we believe should be addressed. These are discussed in detail in **Annexure One** of this submission.

Aurora owns, operates and maintains an electricity distribution network in the Dunedin and Central Otago regions. This network carries electricity from the National Grid to more than 85,000 homes and businesses across Dunedin City and the Central Otago region. Aurora owns substations, lines and cables located in public road reserve, as well as on private property. In addition to the distribution network, Aurora has the capacity to own and operate high voltage (up to 110kV) transmission lines, and associated structures in future, and may be required to do so as regional electricity demand grows. Aurora is committed to providing its customers in the region with an effective and secure supply of electricity which, in doing so, provides a critical service to customers, as well as a public good to local communities including hospitals, schools, offices and residential dwellings.

Infrastructure Overview

The electricity network works provided by Aurora, which have the potential to impact on land and vegetation resources, includes the excavation of land/earthworks and vegetation clearance associated with the erection, placement, upgrade, repair and maintenance of its infrastructure both on land and within the beds and margins of lakes and rivers. Aurora is responsible for the construction and maintenance of an efficient and safe electricity network, which involves the following infrastructure:

- Underground cables;
- Overhead lines;
- Substations/transformers/kiosks;
- Electricity structures (poles/pylons, earth rods and associated buildings); and
- Access tracks.

Aurora's key area of concern is the effect of the policies and objectives in the Proposed Plan on the activities or processes that are required to establish the above infrastructure. There are certain land use activities associated with establishing new infrastructure and maintaining existing infrastructure which involve:

- The excavation of land,
- The disturbance/deposition of soil, and
- Vegetation clearance.

Currently Aurora undertakes these activities in accordance with strict Industry codes of practice, Local Authority requirements, and electricity network technical specification standards.

Summary of Submission

Aurora seeks amendments to various plan provisions to provide greater clarity and certainty around the application and interpretation of proposed provisions. Aurora's submissions are founded on a desire to simplify rules and, where applicable, to reduce reliance on resource consenting as a means of achieving environmental outcomes.

The chapter of particular interest to Aurora is Chapter 30 Energy and Utilities, as it controls activities relating to the electricity distribution network. Aurora is generally comfortable with the construction of this chapter, but seeks amendments to various objectives, policies and rules. Aurora also seeks corridor protection for its strategic electricity distribution assets, which include the following within the Queenstown District:

- All 33kV and 66kV sub-transmission and distribution overhead lines and underground cables;
- 11kV overhead line to Glenorchy;
- 11kV overhead line between the Cardrona Substation up to the ski fields;
- 11kV overhead line to Treble Cone; and
- 11kV overhead line to Makarora.

These assets are indicated on the Planning Maps attached as **Annexure Two**. Aurora considers that it is appropriate that the Proposed Plan contains a policy and rule framework to protect the integrity of these high voltage distributions lines, and their ability to provide the safe, secure and efficient supply of electricity.

Aurora seeks that such Regionally Significant Infrastructure is appropriately reflected in the Proposed Plan and, more importantly, that such infrastructure is protected against land uses and development effects (i.e., reverse sensitivity) that have the potential to compromise its operation. Aurora consider the Operative District Plan currently fails to adequately protect such critical infrastructure (i.e., lines less than 110kV) with the result being that developments have the potential to be consented without input from the affected asset owner.

The high voltage assets and Critical Electricity Lines (“CELS”) owned by Aurora are not covered by the National Environmental Standards for Electricity Transmission activities (“NESETA”), nor any other National Environmental Standard, hence protection of such infrastructure is best provided through the plan review process currently being undertaken.

For Aurora, the provisions of the Proposed Plan need to:

- a) recognise the benefits of Regionally Significant Infrastructure;
- b) ensure and protect the ability for ongoing operation and maintenance of the network;
- c) enable the existing network to be upgraded in order to meet growth in power demand;
- d) protect the existing network from issues of reverse sensitivity; and
- e) provide an appropriate policy framework for the development of new lines.

In addition, Aurora seeks that the Proposed Plan recognises the strategic and lifeline importance of all parts of the electricity network. This is essential to ensure that the Proposed Plan achieves the purpose of the RMA, in that the use, development, and protection of the electricity network (a physical resource) is managed in the most appropriate way to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety.

The Proposed Plan goes some way to achieving these outcomes. However some modifications and/or clarifications are required to the existing text, and additional text is required in order to address all of the relevant resource management issues identified above.

4. Aurora’s specific submissions are outlined in Annexure One below.

The specific provisions that Aurora’s submission relates to are set out in **Annexure One** using the numbering system and headings contained in the Proposed District Plan. The submissions are set out immediately following these headings, together with the decision sought from Council. The decision that has been requested may suggest new or revised wording for identified sections of the Proposed District Plan. This wording is intended to be helpful but alternative wording of like effect may be equally acceptable. The wording of decisions sought shows new text as underlined and original text to be deleted as ~~strikethrough~~.

Unless specified in each submission point, the reasons for supporting are that the policies are consistent with the RMA and would support the enhancement or protection of Regionally Significant Infrastructure.

5. Aurora seeks the following decisions from the Queenstown Lakes District Council:

- (a) that the amendments (or those with similar or like effect or consequential amendments to the Proposed Plan that stem from the submissions and general relief sought) outlined in **Annexure One**, be accepted to ensure:

- the sustainable management of Regionally Significant Infrastructure as a physical resource is provided for;
 - that there is appropriate provision for the ongoing operation and maintenance of the network, including ensuring that lines can be accessed;
 - that the existing network can be upgraded in order to meet growth in energy demand;
 - the protection of the existing network from issues of reverse sensitivity and the effects of others' activities; and
 - appropriate provision for the planning and development of new lines.
- (b) such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission; and
- (c) that, in the event that the amendments set out above are not implemented, the Proposed Plan be withdrawn.
- 6. Aurora wishes to be heard in support of its submission.**
- 7. If others make a similar submission, Aurora will consider presenting a joint case with them at a hearing.**

Signed:.....*Joanne Dowd*.....

On behalf of Aurora Energy Limited

Dated at Dunedin this 23 day of October 2015

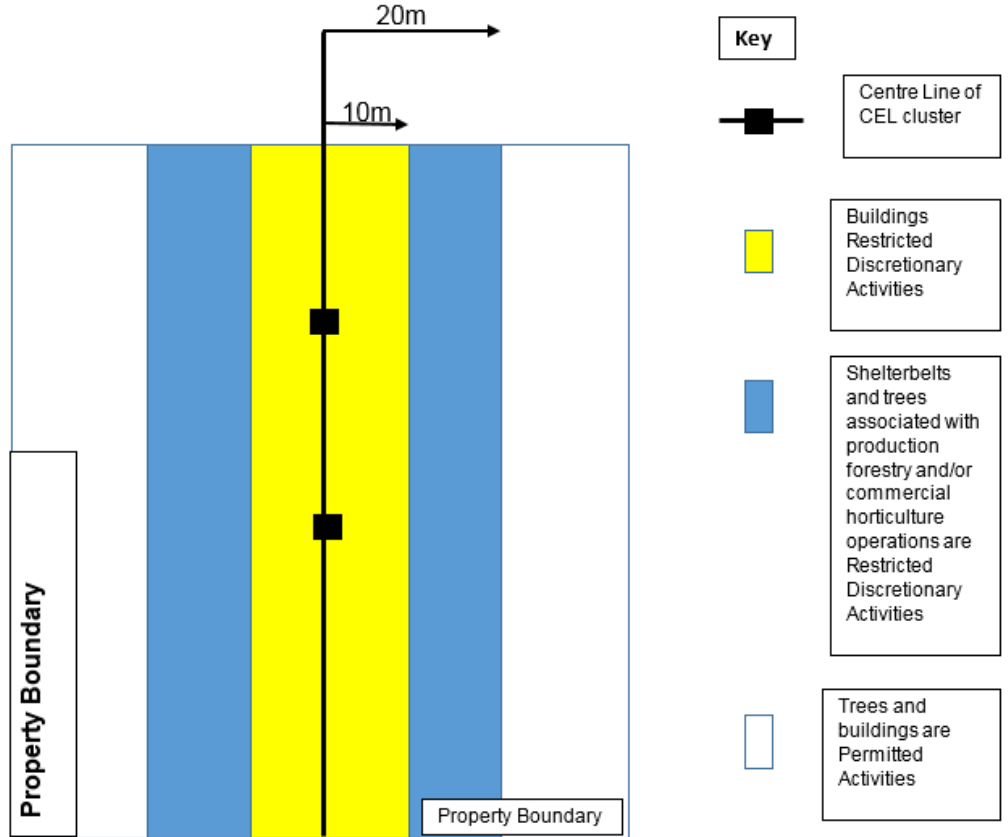
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ANNEXURE ONE

Provision	Support/Oppose	Reason	Relief Sought
<p>2.0 DEFINITIONS</p> <p>Insert New Definition of Critical Electricity Line</p> <p>Critical Electricity Line</p>		<p>Aurora is concerned that issues associated with reverse sensitivity for Critical Electricity Lines (CELs) have not been adequately addressed within the Proposed Plan. Council has associated issues of reverse sensitivity primarily with the National Grid, with little regard or recognition that such effects can impact on the sub-transmission and distribution assets of other network utility operators.</p> <p>The District's sub-transmission network is an element of electricity distribution that can be adversely effected by reverse sensitivity to the same degree as other high voltage transmission lines.</p> <p>The Proposed Otago Regional Policy Statement 2015 includes provisions that seek to <i>recognise the functional needs of infrastructure of regional and national importance</i> (Proposed Policy 3.4.1) and to <i>protect infrastructure corridors for infrastructure needs, now and for the future</i> (Proposed Policy 3.4.2).</p> <p>As such, the regionally significant distribution assets owned by Aurora should be provided for within the Proposed District Plan.</p>	<p>Insert Definition of Critical Electricity Line which include the sub-transmission network within the District.</p> <p>Critical Electricity Line <u>Electrical lines throughout the region that are not covered by National Policy Statement on Electricity Transmission and that are or have the potential to be crucial to the region's quality, reliability and security of electrical supply. These electricity lines are crucial because they contribute to the social and economic wellbeing and health and safety of the region and are lines that:</u></p> <ol style="list-style-type: none"> i. <u>Supply essential public services; or</u> ii. <u>Supply large industrial or commercial electricity consumers; or</u> iii. <u>Supply high numbers of consumers; or</u> iv. <u>Are difficult to replace with an alternative electricity supply if they are compromised.</u> <p><u>Specified distances from Critical Electricity Lines are to be measured from a point directly below the centreline of the line or cluster of lines, as shown in Fig 1 below.</u></p> <p><u>Fig 1</u></p> 

			<p><u>While only critical electricity lines are identified on the planning maps, works in close proximity to all electric lines can be dangerous. Compliance with NZECP 34:2001 as amended from time to time is mandatory for buildings, earthworks, and when using machinery or equipment within close proximity to any electric lines.</u></p> <p>Include appropriate references throughout the Proposed Plan to CELs and provide objectives, policies and rules as detailed below in this submission.</p>
<p>Development</p> <p>For the purpose of determining financial contributions development means development or re-development of the site and includes the construction, erection, establishment or alteration of any building, and the following:</p> <ul style="list-style-type: none"> • Any earthworks, filling or reclamation of land, or the making of any retaining walls or other works relating to that earthworks, filling or reclamation. • The provision for or installation of any mode of transport including any railway or tramway relating to any such construction or erection, establishment or alteration. • Excludes any utility, the construction or alteration of any pipeline or associated works on land that is not otherwise subject to development. 	Support	<p>Aurora consider it is appropriate that utilities are specifically excluded from the definition of development for the purposes of determining financial contributions.</p>	<p>Retain definition.</p>
<p>Insert New Definition Electricity Distribution</p>		<p>Aurora opposes the lack of a definition of Electricity Distribution. The term is used in the Proposed Plan and a definition would provide clarity and certainty for plan users.</p> <p>Aurora, therefore submits that a definition be inserted.</p>	<p>Insert definition of “Electricity Distribution”</p> <p><u>Electricity Distribution</u> <u>Means the conveyance of electricity via electricity distribution lines, cables, support structures, substations, transformers, switching stations, kiosks, cabinets and ancillary buildings and structures, including communication equipment, by a network utility operator. For the avoidance of doubt, this includes, but is not limited to Aurora Energy Limited assets shown on the planning maps.</u></p>
<p>Insert New Definition Electricity Distribution Line Corridor</p>		<p>Aurora opposes the lack of a definition of Electricity Distribution Line Corridor. The term is used in the Proposed Plan and a definition would provide clarity and certainty for plan users.</p> <p>Aurora, therefore submits that a definition be inserted.</p>	<p>Insert a definition of “electricity distribution line corridor”:</p> <p><u>Electricity Distribution Line Corridor</u> <u>Means a buffer area around electricity distribution lines, support structures and substations operated by a network utility operator. For the avoidance of doubt, this applies to Aurora Energy Limited’s assets shown on the planning maps.</u></p>
<p>Minor Upgrading</p> <ul style="list-style-type: none"> - <u>Addition of a single service support structure for the purpose of providing a service connection to a site, except in the Rural zone;</u> - <u>The addition of up to three new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone;</u> 	Oppose in Part	<p>Providers of <u>Regionally Significant Infrastructure</u> such as Aurora require the ability to maintain, replace and upgrade assets to ensure that a safe and reliable electricity supply can be</p>	<p>Amend the definition of Minor Upgrading as follows:</p> <p>Minor Upgrading <u>means an increase in the carrying capacity, efficiency or security of transmission and distribution lines utilising the existing support structures or structures of a similar scale, intensity and character and includes:</u></p>

<ul style="list-style-type: none"> - <u>Replacement of conductors or lines provided they do not exceed 30mm in diameter or the bundling together of any wire, cable or similar conductor provided that the bundle does not exceed 30mm in diameter;</u> - <u>Re-sagging of existing lines;</u> - <u>Replacement of insulators provided they are less or similar in length; and</u> - <u>Addition of lightning rods, earth-peaks and earth-wires.</u> 		<p>maintained within the QLDC District. The focus of the definition is unduly restrictive and should be widened to ensure that activities associated with routine maintenance are not unduly restricted by the need to obtain resource consent.</p>	<ul style="list-style-type: none"> - Addition of a single service support structure for the purpose of providing a service connection to a site, except in the Rural zone; - The addition of up to three <u>four</u> new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone; - Replacement of conductors or lines provided they do not exceed 30mm in diameter or the bundling together of any wire, cable or similar conductor provided that the bundle does not exceed 30mm in diameter; - Re-sagging of existing lines; - Replacement of insulators provided they are less or similar in length; and - Addition of lightning rods, earth-peaks and earth-wires. - <u>The addition of circuits and conductors.</u> - <u>The re-conducting of the line with higher capacity conductors.</u> - <u>The re-sagging of conductors.</u> - <u>The bonding of conductors.</u> - <u>The addition of longer or more efficient insulators.</u> - <u>The addition of earth wires that may contain telecommunication lines, earth peaks and lightning rods.</u> - <u>Support structure replacement within the same or immediately adjacent location within the existing alignment of the distribution corridor.</u> - <u>The replacement of existing cross-arms with cross-arms of an alternative design.</u> - <u>An increase in support structure height required to comply with the New Zealand Electrical Code of Practice 34:2001 by not more than 15% of the base height of the support structure and where the base height is defined as the height of the structure at date of public notification of the District Plan.</u>
<p>Insert New Definition – Regionally Significant Infrastructure</p> <p>Regionally Significant Infrastructure</p>		<p>Aurora submits that a definition of <i>Regionally Significant Infrastructure</i> should be inserted into the Proposed District Plan. Such definitions are used in other District Plan documents within New Zealand, and provide greater certainty around the nature and type of infrastructure that is significant on a regional scale.</p>	<p>Insert New definition as follows:</p> <p><u>Regionally significant infrastructure</u></p> <p><u>Regionally significant infrastructure is:</u></p> <ol style="list-style-type: none"> <u>(1) Strategic land transport network and arterial roads</u> <u>(2) Queenstown Airport</u> <u>(3) Wanaka Airport</u> <u>(4) Telecommunication facilities</u> <u>(5) Electricity generation, transmission and distribution networks</u> <u>(6) Sewage collection, treatment and disposal networks</u> <u>(7) Community land drainage infrastructure</u> <u>(8) Community potable water systems</u> <u>(9) Established community-scale irrigation and stockwater infrastructure</u> <u>(10) Transport hubs</u> <u>(11) Bulk fuel supply infrastructure including terminals, wharf lines and pipelines.</u> <u>(12) Life line utilities as defined in the Civil Defence and Emergency Management Act.</u>
<p>Insert New Definition Support Structure</p>		<p>Aurora supports the inclusion of a definition of “support structure”. The term is proposed as part of the corridor protection measures for the zone and subdivision</p>	<p>Insert definition of Support Structure:</p> <p><u>Support Structure</u></p> <p><u>Means a utility pole or tower that forms part of the electricity distribution network or National Grid that supports conductors as part of an electricity distribution line or transmission line. This includes</u></p>

		chapters. A definition, therefore, would provide clarity and certainty for plan users.	<u>any ancillary equipment, such as communication equipment or transformers, used in the conveyance of electricity.</u>
<p>Temporary Activities</p> <p><u>Means the use of land, buildings, vehicles and structures for activities of short duration and are outside the usual use of a site, that include the following:</u></p> <ul style="list-style-type: none"> • <u>Temporary events</u> • <u>Temporary filming</u> • <u>Temporary activities related to building and construction</u> • <u>Temporary military training</u> • <u>Temporary storage</u> • <u>Temporary utilities</u> • <u>Temporary use of a site as an airport for certain community events</u> <p><u>A temporary activity does not include the extension of an activity authorised by a resource consent where in contravention to any conditions of the resource consent.</u></p>	Support	Aurora considers it is appropriate that provisions are made for temporary utilities.	Retain the definition.
<p>Utility</p> <p><u>Means the systems, services, structures and networks necessary for operating and supplying essential utilities and services to the community including but not limited to:</u></p> <ul style="list-style-type: none"> • transformers, lines and necessary and incidental structures and equipment for the transmissions and distribution of electricity; • pipes and necessary incidental structures and equipment for transmitting and distributing gas; • storage facilities, pipes and necessary incidental structures and equipment for the supply and drainage of water or sewage; • water and irrigation races, drains, channels, pipes and necessary incidental structures and equipment (<u>excluding water tanks</u>); • structures, facilities, plant and equipment for the treatment of water; • structures, facilities, plant, equipment and associated works for receiving and transmitting telecommunications <u>and radio communications</u> (see definition of telecommunication facilities); • structures, facilities, plant, equipment and associated works for monitoring and observation of meteorological activities and natural hazards; • structures, facilities, plant, equipment and associated works for the protection of the community from natural hazards. • structures, facilities, plant and equipment necessary for navigation by water or air; • waste management facilities; and <p><u>Anything described as a network utility operation in s166 of the Resource Management act 1991</u></p>	Oppose in part	<p>Aurora is generally supportive of the definition of <i>Utility</i>, as it is consistent with the definition within the Operative Plan. However, Aurora considers that substations should be provided for under the definition as they are a key aspect of the Aurora distribution network.</p> <p>In addition, while Aurora acknowledges that certain activities have been specifically excluded from the definition, (including electricity generation), Aurora submits that provision should be made for temporary emergency generators.</p> <p>Emergency and backup generators provide a vital role in maintaining supply of electricity during times of supply interruption.</p>	<p>Amend the definition of Utility as follows:</p> <p>Utility</p> <p><u>Means the systems, services, structures and networks necessary for operating and supplying essential utilities and services to the community including but not limited to:</u></p> <ul style="list-style-type: none"> • <u>substations</u>, transformers, lines and necessary and incidental structures and equipment for the transmission and distribution of electricity; • pipes and necessary incidental structures and equipment for transmitting and distributing gas; • storage facilities, pipes and necessary incidental structures and equipment for the supply and drainage of water or sewage; • water and irrigation races, drains, channels, pipes and necessary incidental structures and equipment (<u>excluding water tanks</u>); • structures, facilities, plant and equipment for the treatment of water; • structures, facilities, plant, equipment and associated works for receiving and transmitting telecommunications <u>and radio communications</u> (see definition of telecommunication facilities); • structures, facilities, plant, equipment and associated works for monitoring and observation of meteorological activities and natural hazards; • structures, facilities, plant, equipment and associated works for the protection of the community from natural hazards. • structures, facilities, plant and equipment necessary for navigation by water or air; • waste management facilities; and <p><u>Anything described as a network utility operation in s166 of the Resource Management act 1991</u></p>

Utility does not include structures or facilities used for electricity generation, the manufacture and storage of gas, or the treatment of sewage.			Utility does not include structures or facilities used for electricity generation (<u>excluding temporary emergency generators</u>), the manufacture and storage of gas, or the treatment of sewage.
3.0 - STRATEGIC DIRECTION Insert New Objective under 3.2.1 Goal – Develop a prosperous, resilient and equitable economy		Aurora submits that, given the over-arching strategic direction of this chapter of the proposed Plan, recognition should be given to the benefits of <u>Regionally Significant Infrastructure</u> and the contribution it makes to the economy of the District. There is currently no acknowledgement of the significance of infrastructure in this section of the Plan.	Insert New Objective xxx <u>The social, economic, environmental and cultural benefits of infrastructure, including Regionally Significant Infrastructure, are recognised and provided for.</u>
Objective 3.2.1.5 Maintain and promote the efficient operation of the District’s infrastructure, including designated Airports, key roading and communication technology networks.	Oppose in part	Aurora is generally supportive of this objective, as it is appropriate to ensure that provision is made to enable the District’s infrastructure to be maintained and efficiently operated. However, Aurora considers that, given the strategic nature of this Chapter of the Proposed Plan, the objective should relate to Regionally Significant Infrastructure including Aurora’s assets.	Amend Objective 3.2.1.5 as follows: Objective 3.2.1.5 Maintain and promote the <u>safe, efficient and effective, provision and use of operation</u> of the District’s infrastructure, including <u>the optimisation of the use of Regionally Significant Infrastructure.</u> designated Airports, key roading and communication technology networks. Insert definition of Regionally Significant Infrastructure.
Objective 3.2.2.1 Ensure urban development occurs in a logical manner: <ul style="list-style-type: none"> • to promote a compact, well designed and integrated urban form; • to manage the cost of Council infrastructure; and • to protect the District’s rural landscapes from sporadic and sprawling development. 	Oppose in part	Aurora is generally supportive of this objective, as it is appropriate to ensure that infrastructure is developed and able to be developed, in response to growth and development. However, Aurora considers that the objective should not be limited to Council infrastructure. There is a need to sustainably manage all infrastructure within the District.	Amend Objective 3.2.2.1 as follows: Objective 3.2.2.1 Ensure urban development occurs in a logical manner: <ul style="list-style-type: none"> • to promote a compact, well designed and integrated urban form; • to manage the cost of Council infrastructure; and • to protect the District’s rural landscapes from sporadic and sprawling development.
Policy 3.2.2.1.3 Manage the form of urban development within the UGBs ensuring: <ul style="list-style-type: none"> • Connectivity and integration with existing urban development; • Sustainable provision of Council infrastructure; and • Facilitation of an efficient transport network, with particular regard to integration with public and active transport systems 	Oppose in part	Aurora is generally supportive of this Policy, as it is appropriate to ensure that infrastructure is developed and able to be developed, in response to growth and development. However, Aurora considers that the objective should not be limited to Council infrastructure. There is a	Amend Policy 3.2.2.1.3 Policy 3.2.2.1.3 Manage the form of urban development within the UGBs ensuring: <ul style="list-style-type: none"> • Connectivity and integration with existing urban development; • Sustainable provision of Council infrastructure; and • Facilitation of an efficient transport network, with particular regard to integration with public and active transport systems

		need to sustainably manage all infrastructure within the District.	
Policy 3.2.3.1.2 That larger scale development is comprehensively designed with an integrated and sustainable approach to infrastructure, buildings, street, trail and open space design.	Support in part	Aurora supports Policy 3.2.3.1.2 in so far as it seeks to ensure that infrastructure provision forms part of an integrated and sustainable approach to future development.	Retain Policy 3.2.3.1.2
Policy 3.2.4.6.1 That subdivision and / or development be designed so as to avoid adverse effects on the water quality of lakes, rivers and wetlands in the District.	Oppose in part	The absolute wording of the Policy “to avoid adverse effects” is of concern in light of the <i>King Salmon</i> Supreme Court decision ¹ . In <i>King Salmon</i> , “avoid” was held (by the majority) to have a greater weight ² than if the environmental bottom line approach was adopted. Aurora is of the view that there should be scope within the policy to allow for the remediation or mitigation of adverse effects, including significant adverse effects.	Amend Policy 3.2.4.6.1 Policy 3.2.4.6.1 That subdivision and / or development be designed so as to: (a) <u>avoid significant adverse effects on the water quality of lakes, rivers and wetlands in the District, where it is practicable to do so; and</u> (b) <u>avoid, remedy or mitigate other adverse effects on the water quality of lakes, rivers and wetlands in the District.</u>
3.2.5 Goal - Our distinctive landscapes are protected from inappropriate development. Insert New Objective xxx and Policy xxxx		Aurora submits that the Strategic Direction Chapter does not recognise and provide for the location and technical constraints associated with infrastructure provision. Aurora submit that this section of the plan should recognise and provide for Regionally Significant Infrastructure.	Insert Objective xxxx <u>Recognise that Regionally Significant Infrastructure has specific location and technical constraints.</u> Insert New Policy xxx <u>Manage potential effects of Regionally Significant Infrastructure on the surrounding environment, having regard to the economic benefits and technical and operational needs of such infrastructure.</u>
3.2.3 Goal – Enable a safe and health community that is strong, diverse and inclusive for all people Insert New Objective xxx		Aurora submits that the Strategic Direction Chapter does not recognise and provide for the benefits of infrastructure provision and the role it plays in creating resilient communities.	Insert New Objective xxx <u>Objective xxx</u> <u>Good quality infrastructure and services meet community needs.</u>

¹ Environmental Defence Society Inc. v The New Zealand King Salmon Co Ltd [2014] NZSC 38.

² In the sense of ‘not allow’ or ‘prevent the occurrence of’.

4.0 - URBAN DEVELOPMENT			
<p>Objective 4.2.1 Urban development is coordinated with infrastructure and services and is undertaken in a manner that protects the environment, rural amenity and outstanding natural landscapes and features.</p>	Oppose in part	<p>Aurora is supportive of provisions that seek to co-ordinate the infrastructural requirements associated with future urban development and growth.</p> <p>Aurora is concerned that this objective is overly restrictive and generic, in that it seeks to 'protect' the environment, rural amenity and outstanding natural landscapes and features. It could be construed that, by seeking to protect such resources, no development or use would be deemed to be acceptable. Given this, Aurora considers that the focus of the objective should be to identify such resources that adjoin areas earmarked for urban development, and to maintain and, where appropriate, enhance the values that contribute to the significance of the resource.</p>	<p>Amend Objective 4.2.1 as follows: Urban development is coordinated with infrastructure and services and is undertaken in a manner that <u>maintains and where appropriate enhances</u> protects the environment, rural amenity and outstanding natural landscapes and features <u>of adjoining land</u>.</p>
<p>Policy 4.2.1.2 Urban development is integrated with existing public infrastructure, and is designed and located in a manner consistent with the capacity of existing networks.</p>	Oppose in part	<p>Aurora is generally supportive of this Policy, as it is appropriate to ensure that infrastructure is developed and able to be developed, in response to growth and development. However, Aurora considers that the objective should not be limited to Council infrastructure. There is a need to sustainably manage all infrastructure within the District.</p>	<p>Amend Policy 4.2.1.2 as follows: Urban development is integrated with existing public infrastructure, and is designed and located in a manner consistent with the capacity of existing networks.</p>
<p>Objective 4.2.3 Within Urban Growth Boundaries, provide for a compact and integrated urban form that limits the lateral spread of urban areas, and maximises the efficiency of infrastructure operation and provision.</p>	Support in part	<p>Aurora supports this objective in so far as it seeks to maximise the efficient development, operation and use of infrastructure. However, Aurora considers that the Objective should be amended to provide greater clarity.</p>	<p>Amend Objective 4.2.3 as follows: Within Urban Growth Boundaries, provide for a compact and integrated urban form that limits the lateral spread of urban areas, and maximises the <u>efficient</u> tey <u>development, operation and use of</u> infrastructure operation and provision.</p>
<p>Policy 4.2.3.1</p>	Oppose in part	<p>Aurora is generally supportive of this Policy, as it is appropriate to ensure that infrastructure is</p>	<p>Amend Policy 4.2.3.1 as follows:</p>

<p>Provide for a compact urban form that utilises land and infrastructure in an efficient and sustainable manner, ensuring:</p> <ul style="list-style-type: none"> • connectivity and integration; • the sustainable use of public infrastructure; • convenient linkages to the public and active transport network; and • housing development does not compromise opportunities for commercial or community facilities in close proximity to centres. 		<p>developed and able to be developed, in response to growth and development. However, Aurora considers that the objective should not be limited to Council infrastructure. There is a need to sustainably manage all infrastructure within the District.</p>	<p>Provide for a compact urban form that utilises land and infrastructure in an efficient and sustainable manner, ensuring:</p> <ul style="list-style-type: none"> • connectivity and integration; • the sustainable use of public infrastructure; • convenient linkages to the public and active transport network; and • housing development does not compromise opportunities for commercial or community facilities in close proximity to centres.
<p>Policy 4.2.3.4 Urban development occurs in locations that are adequately serviced by existing public infrastructure, or where infrastructure can be efficiently upgraded.</p>	<p>Oppose in part</p>	<p>Aurora is generally supportive of this Policy, as it is appropriate to ensure that infrastructure is developed and able to be developed, in response to growth and development. However, Aurora considers that the objective should not be limited to Council infrastructure only. There is a need to sustainably manage all infrastructure within the District.</p>	<p>Amend Policy 4.2.3.4 as follows: Urban development occurs in locations that are adequately serviced by existing public infrastructure, or where infrastructure can be efficiently upgraded.</p>
<p>Policy 4.2.4.1 Limit the spatial growth of Queenstown so that:</p> <ul style="list-style-type: none"> • the natural environment is protected from encroachment by urban development • sprawling of residential settlements into rural areas is avoided • residential settlements become better connected through the coordinated delivery of infrastructure and community facilities • transport networks are integrated and the viability of public and active transport is improved • the provision of infrastructure occurs in a logical and sequenced manner • the role of Queenstown Town Centre as a key tourism and employment hub is strengthened • the role of Frankton in providing local commercial and industrial services is strengthened 	<p>Support in part</p>	<p>Aurora supports Policy 4.2.4.1 in so far as it seeks to recognise and provide for the co-ordinated delivery of infrastructure.</p>	<p>Retain the policy</p>
<p>Policy 4.2.4.2 Ensure that development within the Queenstown Urban Growth Boundary:</p> <ul style="list-style-type: none"> • Provides a diverse supply of residential development to cater for the needs of residents and visitors • Provides increased density in locations close to key public transport routes and with convenient access to the Queenstown Town Centre • Provides an urban form that is sympathetic to the natural setting and enhances the quality of the built environment • Provides infill development as a means to address future housing demand • Provides a range of urban land uses that cater for the foreseeable needs of the community 	<p>Oppose in part</p>	<p>Aurora supports Policy 4.2.4.2 in so far as it seeks to recognise and maximise the efficiency of existing infrastructure networks. However, Aurora is concerned that the policy seeks to avoid the expansion of networks before it is needed for future urban development. Aurora submits that the level of expenditure required to service new urban development is substantial and</p>	<p>Amend Policy 4.2.4.2 as follows: Ensure that development within the Queenstown Urban Growth Boundary:</p> <ul style="list-style-type: none"> • Provides a diverse supply of residential development to cater for the needs of residents and visitors • Provides increased density in locations close to key public transport routes and with convenient access to the Queenstown Town Centre • Provides an urban form that is sympathetic to the natural setting and enhances the quality of the built environment • Provides infill development as a means to address future housing demand • Provides a range of urban land uses that cater for the foreseeable needs of the community

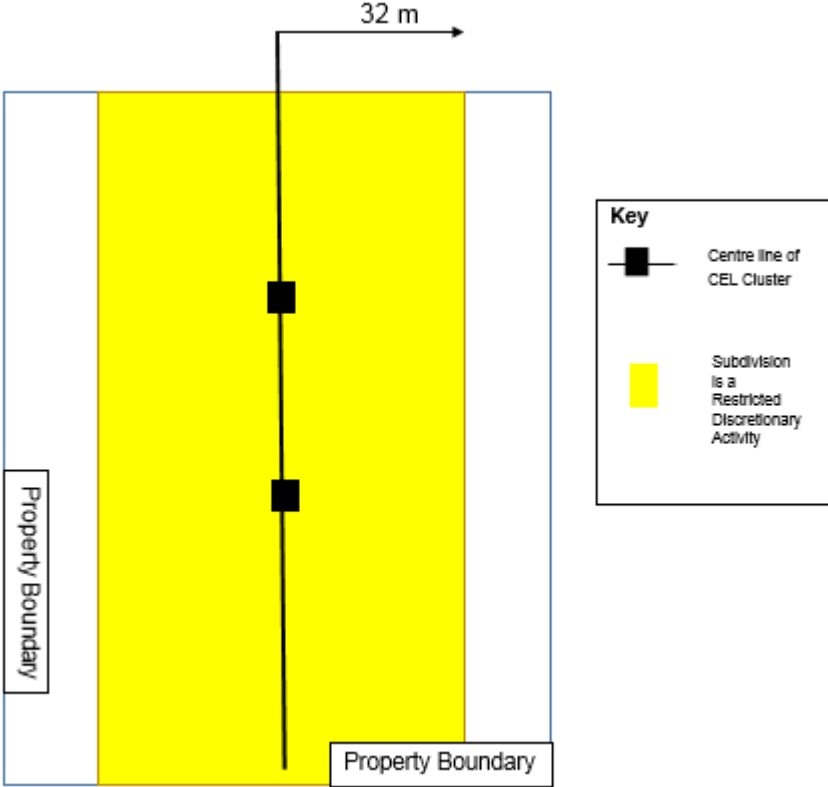
<ul style="list-style-type: none"> • Maximises the efficiency of existing infrastructure networks and avoids expansion of networks before it is needed for urban development • Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities • Does not diminish the qualities of significant landscape features 		<p>that forward planning is essential to ensure that its network can efficiently accommodate the required future load. As such, Aurora submits that this policy should be amended to ensure that opportunities for future expansion of its networks are not inhibited.</p>	<ul style="list-style-type: none"> • Maximises the efficiency of existing infrastructure networks and avoids expansion <u>provides opportunities for expansion of such networks required for future of networks before it is needed for</u> urban development • Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities • Does not diminish the qualities of significant landscape features
<p>Policy 4.2.6.2</p> <p>Ensure that development within the Wanaka Urban Growth Boundary:</p> <ul style="list-style-type: none"> • Supports increased density through greenfield and infill development, in appropriate locations, to avoid sprawling into surrounding rural areas • Provides a sensitive transition to rural land at the edge of the Urban Growth Boundaries through the use of: appropriate zoning and density controls; setbacks to maintain amenity and open space; and design standards that limit the visual prominence of buildings • Facilitates a diversity of housing supply to accommodate future growth in permanent residents and visitors • Maximises the efficiency of existing infrastructure networks and avoids expansion of networks before it is needed for urban development • Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities • Does not diminish the qualities of significant landscape features • Rural land outside of the Urban Growth Boundary is not developed until further investigations indicate that more land is needed to meet demand. 	Oppose in part	<p>Aurora supports Policy 4.2.6.2 in so far as it seeks to recognise and maximise the efficiency of existing infrastructure networks. However, Aurora is concerned that the policy seeks to avoid the expansion of networks before it is needed for future urban development. Aurora submits that the level of expenditure required to service new urban development is substantial and forward planning is essential to ensure that its network can efficiently accommodate the required future load. As such, Aurora submits that this policy should be amended to ensure that opportunities for future expansion of its networks are not inhibited.</p>	<p>Amend Policy 4.2.6.2 as follows:</p> <p>Ensure that development within the Wanaka Urban Growth Boundary:</p> <ul style="list-style-type: none"> • Supports increased density through greenfield and infill development, in appropriate locations, to avoid sprawling into surrounding rural areas • Provides a sensitive transition to rural land at the edge of the Urban Growth Boundaries through the use of: appropriate zoning and density controls; setbacks to maintain amenity and open space; and design standards that limit the visual prominence of buildings • Facilitates a diversity of housing supply to accommodate future growth in permanent residents and visitors • Maximises the efficiency of existing infrastructure networks and avoids expansion <u>provide opportunities for expansion of such networks required for future of networks before it is needed for</u> urban development • Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities • Does not diminish the qualities of significant landscape features • Rural land outside of the Urban Growth Boundary is not developed until further investigations indicate that more land is needed to meet demand.
<p>6.0 - LANDSCAPES</p>			
<p>Objective 6.3.1</p> <p>Objective - The District contains and values Outstanding Natural Features, Outstanding Natural Landscapes, and Rural Landscapes that require protection from inappropriate subdivision and development.</p>	Oppose	<p>This policy is opposed by Aurora, as it seeks to protect landscapes and features that are not deemed to be “outstanding” in accordance with section 6(b) of the RMA. While Aurora accepts that it is appropriate to manage the adverse effects on amenity values, it does not agree that the focus of this policy should be to “protect” such landscapes.</p>	<p>Amend Objective 6.3.1 as follows:</p> <p>Objective - The District contains and values Outstanding Natural Features, <u>and</u> Outstanding Natural Landscapes, and Rural Landscapes that require protection from inappropriate subdivision and development.</p>
<p>Policy 6.3.1.3</p> <p>That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and</p>	Oppose	<p>While Aurora acknowledges that it is a necessary requirement, under the RMA, to protect areas of outstanding natural</p>	<p>Amend Policy 6.3.1.3 as follows:</p> <p>That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and development is inappropriate in almost all locations,</p>

<p>development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.</p>		<p>landscapes and features from inappropriate use, subdivision and development; it is considered that this can be achieved with the appropriate management of adverse effects, particularly in relation to <u>Regionally Significant Infrastructure</u>. As the objectives and policies of the Landscape Section are a relevant consideration for any resource consent for a utility in the Rural Zone, provisions that recognise the locational and technical constraints of such infrastructure should be reflected in the policy framework.</p>	<p>meaning successful applications will be exceptional cases. <u>In the case of Regionally Significant Infrastructure, where there are specific locational requirements that mean the activity must occur in the areas where natural elements/influences are dominant, then emphasis will be given to opportunities to remedy or mitigate adverse effects on natural character.</u></p>
<p>Policy 6.3.1.4 That subdivision and development proposals located within the Rural Landscape be assessed against the assessment matters in provisions 21.7.2 and 21.7.3 because subdivision and development is inappropriate in many locations in these landscapes, meaning successful applications will be, on balance, consistent with the assessment matters.</p>	<p>Oppose</p>	<p>This policy is opposed by Aurora, as it seeks to protect landscapes and features that are not deemed to be “outstanding” in accordance with section 6(b) of the RMA. While Aurora accepts that it is appropriate to manage the adverse effects on amenity values, it does not agree that the focus of this policy should require the same level of protection or assessment.</p> <p>Aurora has various utilities located in landscape areas, and has a need to establish, maintain, repair, replace and upgrade these utilities to support the safe, efficient and secure distribution of electricity.</p> <p>As the objectives and policies of the Landscape Section are a relevant consideration for any resource consent for a utility in the Rural Zone, provisions that recognise the locational and technical constraints of such infrastructure should be reflected in the policy framework.</p>	<p>Amend Policy 6.3.1.4 as follows: That subdivision and development proposals located within the Rural Landscape be assessed against the assessment matters in provisions 21.7.2 and 21.7.3 because subdivision and development is inappropriate in many locations in these landscapes, meaning successful applications will be, on balance, consistent with the assessment matters. <u>In the case of Regionally Significant Infrastructure, where there are specific locational requirements that mean the activity must occur in the areas where natural elements/influences are dominant, then emphasis will be given to opportunities to remedy or mitigate adverse effects on such values.</u></p>

<p>Policy 6.3.5.5 Encourage development to utilise shared accesses and infrastructure, to locate within the parts of the site where they will be least visible, and have the least disruption to the landform and rural character.</p>	Oppose in part	Aurora submits that it is not always possible to locate <u>Regionally Significant Infrastructure</u> in areas with the least visibility. There are operational and technical considerations that can dictate the location of assets and this should be recognised in Policy 6.3.5.5.	<p>Amend Policy 6.3.5.5 as follow: Encourage development to utilise shared accesses and infrastructure, to locate within the parts of the site where they will be least visible, and have the least disruption to the landform and rural character <u>where operationally and technically feasible</u>.</p>
<p>Objective 6.3.6 Protect, maintain or enhance the landscape quality, character and visual amenity provided by the lakes and rivers and their margins from the adverse effects of structures and activities.</p>	Oppose in part	This policy is opposed by Aurora, as it seeks to protect lakes, rivers and their margins that are not deemed to be “outstanding” in accordance with section 6(b) of the RMA. While Aurora accepts that it is appropriate to manage the adverse effects on landscape quality, character and visual amenity, it does not agree that the focus of this policy should be to “protect” such features.	<p>Amend Objective 6.3.6 as follows: Protect, maintain or <u>where appropriate</u> enhance the landscape quality, character and visual amenity provided by the lakes and rivers and their margins from the adverse effects of structures and activities.</p>
<p>Policy 6.3.6.1 Control the location, intensity and scale of buildings, jetties, moorings and utility structures on the surface and margins of water bodies and ensure these structures maintain or enhance the landscape quality, character and amenity values.</p>	Oppose in part	This policy is opposed in part by Aurora because the objectives and policies of the Landscape Section are a relevant consideration for any resource consent for a utility in the Rural Zone. Aurora submit that provisions that recognise the locational and technical constraints of such infrastructure should be reflected in the policy framework. In addition, it is not always possible to enhance landscape quality and the policy should be amended to reflect that.	<p>Amend Policy 6.3.6.1 as follows: Control the location, intensity and scale of buildings, jetties, moorings and utility structures on the surface and margins of water bodies and ensure these structures maintain or <u>where appropriate</u> enhance the landscape quality, character and amenity values.</p>
26.0 HISTORIC HERITAGE			
<p>Objective 26.5.1 To recognise and protect historic heritage features in the District from the adverse effects of land use, subdivision and development.</p>	Oppose in part	Section 6 of the RMA refers to the impact of <i>inappropriate</i> activities. As such, Aurora submits that the objective should be amended to refer to <i>inappropriate</i> subdivision, development and land use, as in some case subdivision, use and development may be considered	<p>Amend Objective 26.5.1 as follows: To recognise and protect historic heritage features in the District from the adverse effects of <u>inappropriate</u> land use, subdivision and development.</p>

		appropriate, particularly in relation to <u>Regionally Significant Infrastructure</u> provision.	
Policy 26.5.1.3 Require the mitigation of development affecting historic heritage, where it cannot be reasonable avoided, to be proportionate to the level of significance of the feature.	Support in part	Aurora is generally supportive of provisions that seek to provide opportunities to mitigate potential effects of development affecting historic heritage. Due to the specific locational and technical constraints of infrastructure it is not always possible to avoid development within historic heritage areas and as such opportunities to remedy or mitigate effects should be reflected in the policy framework.	Retain Policy 26.5.1.3
27.0 SUBDIVISION AND DEVELOPMENT			
Objective 27.2.5 Require infrastructure and services are provided to lots and developments in anticipation of the likely effects of land use activities on those lots and within overall developments.	Oppose in part	Aurora submits that the wording of this Objective is confusing and should be amended to be more directional and clear in terms of what it is seeking to achieve.	Reword Objective 27.2.5 as follows: Require infrastructure and services to be <u>are</u> provided to <u>new lots and subdivision and developments, within the District,</u> in anticipation of the likely effects of land use activities on those lots and within overall developments.
Energy Supply and Telecommunications Policy 27.2.5.16 To ensure adequate provision is made for the supply and installation of reticulated energy, including street lighting, and communication facilities for the anticipated land uses while: <ul style="list-style-type: none"> • Providing flexibility to cater for advances in telecommunication and computer media technology, particularly in remote locations; • Ensure the method of reticulation is appropriate for the visual amenity values of the area by generally requiring services are underground; • Have regard to the design, location and direction of lighting to avoid upward light spill, recognising the night sky as an element that contributes to the District's sense of place; • Generally require connections to electricity supply and telecommunications systems to the boundary of the net area of the lot, other than lots for access, roads, utilities and reserves. 	Support in part	Aurora supports this policy in so far as it seeks to ensure that adequate provision is made for the supply and installation of reticulated energy and communications facilities, particularly in remote locations. Given the regionally significant nature of Aurora's assets, it is considered appropriate that recognition is also given to advances in technology. However, Aurora note that it is not always technically or operationally feasible to place services underground and this should be recognised within the policy.	Amend Policy 27.2.5.16 as follows: To ensure adequate provision is made for the supply and installation of reticulated energy, including street lighting, and communication facilities for the anticipated land uses while: <ul style="list-style-type: none"> • Providing flexibility to cater for advances in telecommunication and computer media technology, particularly in remote locations; • Ensure the method of reticulation is appropriate for the visual amenity values of the area by generally requiring services are <u>placed underground where technically and operationally feasible</u>; • Have regard to the design, location and direction of lighting to avoid upward light spill, recognising the night sky as an element that contributes to the District's sense of place; • Generally require connections to electricity supply and telecommunications systems to the boundary of the net area of the lot, other than lots for access, roads, utilities and reserves.
Insert New Policy – Reverse Sensitivity		Aurora submits that it is appropriate to recognise that	Insert New Policy

		subdivision and subsequent land use and development can increase the potential for reverse sensitivity effects on Infrastructure. Provision should be made within the proposed subdivision chapter to ensure that the presence and function of <u>Regionally Significant Infrastructure</u> is recognised and provided for, including measures to prevent the establishment and expansion of sensitive activities in the vicinity of such infrastructure.	<p><u>Policy xxx</u></p> <p><u>Avoid, remedy or mitigate reverse sensitivity effects on infrastructure.</u></p> <p><u>Explanation:</u> <u>Subdivision and subsequent land use and development can increase the potential for reverse sensitivity effects on infrastructure. Infrastructure and network utility operators provide an important essential service to the Queenstown Lakes District and Wider National Networks. To ensure the continuation of this essential service the presence and function of the infrastructure should be recognised and careful consideration given to preventing the establishment and expansion of sensitive activities located in the vicinity of infrastructure.</u></p>
<p>Easements Policy 27.2.5.17</p> <p>Ensure that services, shared access and public access is identified and managed by the appropriate easement provisions.</p>	Support	Aurora considers it is appropriate that <u>Regionally Significant Infrastructure</u> is identified and managed by the appropriate easement provisions.	Retain the policy
<p>Policy 27.2.5.18</p> <p>Ensure that easements are of an appropriate size, location and length for the intended use.</p>	Support	Aurora considers it is appropriate that easements are defined and of a scale commensurate with its intended use.	Retain the policy
<p>Rule 27.5.1.3</p> <p>Lots created for access, utilities, roads and reserves shall have no minimum size.</p>	Support in part	Aurora considers it is appropriate that subdivision required as part of utilities (including Aurora's <u>Regionally Significant Infrastructure</u> assets) are exempt from the requirement to comply with a minimum lot size. In addition, Aurora considers it should be explicit in the rule that such utility lots are not required to identify a building platform.	<p>Amend Rule 27.5.1.3 as follows:</p> <p>27.5.1.3 Lots created for access, utilities, roads and reserves shall have no minimum size <u>and shall not be required to identify a building platform.</u></p>
<p>Rule 27.6.1.2</p> <p>The following activities shall not be considered for the provision of Esplanade reserves or strips:</p> <p>a) Activities that qualify as exempt under rules (27.6.1.1) above.</p>	Support	Aurora considers it is appropriate that subdivision required as part of utilities (including Aurora's <u>Regionally Significant Infrastructure</u> assets) are exempt from the requirement to provide an esplanade reserve/strip and	Retain Rule 27.6.1.2

<p>b) Where a proposed subdivision arises solely due to land being acquired or a lot being created for a road designation, utility or reserve, then section 230 of the Act shall not apply.</p>		<p>as such section 230 of the act does not apply.</p>	
<p>Insert New Rule</p> <p>Rule xxx - Restricted Discretionary Activity - Subdivision</p>		<p>Aurora is concerned that issues associated with reverse sensitivity for Critical Electricity Lines (CELs) have not been adequately addressed within the Proposed Plan. Council has associated issues of reverse sensitivity primarily with the National Grid, with little regard or recognition that such effects can impact on the sub-transmission and distribution assets of other network utility operators.</p> <p>The District's sub-transmission network is an element of electricity distribution that can be adversely effected by reverse sensitivity to the same degree as other high voltage transmission lines.</p> <p>The Proposed Otago Regional Policy Statement 2015 includes provisions that seek to <i>recognise the functional needs of infrastructure of regional and national importance</i> (Proposed Policy 3.4.1) and to <i>protect infrastructure corridors for infrastructure needs, now and for the future</i> (Proposed Policy 3.4.2).</p> <p>As such the regionally significant distribution assets owned by Aurora should be addressed as part of the Proposed District Plan including the provision for CEL's.</p>	<p>Insert New Rule</p> <p>Rule xxx</p> <p>Restricted Discretionary Activity - Subdivision</p> <p>1. Subdivision within 32m of the centre line of a Critical Electricity Line, or within 32m from the designation boundary of a substation shall be a restricted discretionary activity.</p>  <p>Key</p> <ul style="list-style-type: none"> ■ Centre line of CEL Cluster ■ Subdivision is a Restricted Discretionary Activity <p>Classification of Subdivision in Vicinity of Critical Electricity Lines</p> <p>When considering any restricted discretionary activity under Rule xxx, discretion will be restricted to:</p> <p>i. the safe and efficient operation and maintenance of the electricity supply network, including:</p> <ol style="list-style-type: none"> a. The use, design and location of buildings; and b. The mature size, growth rate, location, and fall zone of any associated tree planting, including landscape planting and shelterbelts; and c. Compliance with NZECP 34:2001; and d. Effects on public health and safety; and e. Effects on access to CEL's, designated substations and associated infrastructure for maintenance purposes. <p>For restricted discretionary activities under Rule xxx the relevant network utility operator will be considered an affected party under s 95E of the Resource Management Act, 1991.</p>

28.0 – NATURAL HAZARDS			
<p>Policies 28.3.1.1</p> <p>Ensure assets or infrastructure are constructed and located so as to avoid or mitigate the potential risk of damage to human life, property, infrastructural networks and other parts of the environment.</p>	Support in part	<p>Aurora agrees that <u>Regionally Significant Infrastructure</u> should be constructed and located such that the risk of damage to human life, property and the environment are minimised.</p> <p>However, it should be recognised that there may be cases where it is necessary to locate <u>Regionally Significant Infrastructure</u> in areas subject to hazards, and that this risk can be managed through appropriate measures, rather than avoidance. Infrastructure providers, such as Aurora, are in the best position to assess the risks of locating network utility structures (involving non-habitable buildings) in potential hazard areas in terms of continuity of electricity services.</p>	Retain Policy 28.3.1.1
<p>Policy 28.3.1.3</p> <p>Recognise that some areas that are already developed are now known to be at risk from natural hazards and minimise such risk as far as possible while acknowledging that landowners may be prepared to accept a level of risk.</p>	Support in part	<p>Aurora submits that infrastructure is a significant physical resource and is essential to the social and economic wellbeing of the community. Such infrastructure is already located in areas subject to natural hazard risk in Otago and is the subject of considerable financial investment and unlikely to be readily replaced or duplicated.</p> <p>It is therefore appropriate to recognise that <u>Regionally Significant Infrastructure</u> can have a functional, technical or operational requirement to be sited within areas subject to natural hazard risk, and it may not always be possible to avoid locating such assets within these areas. The ability to design electricity network assets, such that the potential adverse effects</p>	Retail Policy 28.3.1.3

		of natural hazards are minimised, is supported.	
<p>Objective 28.3.2 Development on land subject to natural hazards only occurs where the risks to the community and the built environment are avoided or appropriately managed or mitigated.</p>	Support in part	<p>Aurora supports this policy in part in so far as it is agreed that the risk of natural hazards to are minimised /reduced. However, it should be recognised that there may be cases where it is necessary to locate <u>Regionally Significant Infrastructure</u> in areas subject to hazards, and that this risk can be managed through appropriate measures, rather than avoidance. Infrastructure providers, such as Aurora, are in the best position to assess the risks of locating network utility structures (involving non-habitable buildings) in potential hazard areas in terms of continuity of electricity services.</p>	Retain Objective 28.3.2
<p>Policy 28.3.2.1 Seek to avoid intolerable natural hazard risk, acknowledging that this will not always be practicable in developed urban areas.</p>	Support	<p>Aurora submits that infrastructure is a significant physical resource and is essential to the social and economic wellbeing of the community. Such infrastructure is already located in areas subject to natural hazard risk within the District and is the subject of considerable financial investment and unlikely to be readily replaced or duplicated.</p> <p>It is therefore appropriate to recognise that <u>Regionally Significant Infrastructure</u> can have a functional, technical or operational requirement to be sited within areas subject to natural hazard risk, and it may not always be possible to avoid locating such assets within these areas. The ability to design electricity network assets, such that the potential adverse effects</p>	Retain Policy 28.3.2.1

		of natural hazards are minimised, is supported.	
30.0 ENERGY AND UTILITIES			
<p>Introduction</p> <p>Utilities are essential to the servicing and functioning of the District. Utilities have the purpose to provide a service to the public and are typically provided by a network utility operator.</p> <p>Due to the importance of utilities in providing essential services to the community, their often high capital cost to establish, and their long life expectancy; the need for the establishment and on-going functioning, maintenance and upgrading of utilities is recognised. In addition, some utilities have specific locational needs that need to be accommodated for their operation. The co-location of utilities may achieve efficiencies in design and operation, reduce capital investment costs and also minimise amenity and environmental effects. The ability to co-locate compatible uses should be considered for all utility proposals.</p> <p>It is recognised while utilities can have national, regional and local benefits, they can also have adverse effects on surrounding land uses, some of which have been established long before the network utility. The sustainable management of natural and physical resources requires a balance between the effects of different land uses. However, it is also necessary that essential utilities are protected, where possible, from further encroachment by incompatible activities that may be subject to reverse sensitivity effects. This chapter therefore also addresses requirements for sensitive uses and habitable buildings located near to utilities.</p>	Support	Aurora supports the Introduction to the Energy and Utilities Chapter in so far as it recognises that the sustainable management of natural and physical resources requires a balance between the effects of different land uses. Aurora also supports that provision is made to protect utilities from further encroachment by incompatible activities that may be subject to reverse sensitivity effects.	Retain the Introduction
<p>Policy 30.2.3.7</p> <p>Consider non-renewable energy resources including standby power generation and Stand Alone Power systems where adverse effects can be mitigated.</p>	Support	Aurora considers it appropriate that provision is made for standby power generation, particularly emergency generators to ensure the supply of electricity is maintained during periods of supply interruption.	Retain Policy 30.2.3.7
<p>Policy 30.2.5.3</p> <p>Recognise the future needs of utilities and ensure their provision in conjunction with the provider.</p>	Support in part	Aurora is generally supportive of Policy 30.2.5.3, but considers it should be reworded to improve clarity.	Amend Policy 30.2.5.3 as follows: Recognise <u>and provide for the growth and the future development needs</u> of utilities <u>within the District and work ensure their provision in conjunction with the provider.</u>
<p>Policy 30.2.6.1</p> <p>Recognise the need for maintenance or upgrading of a utility to ensure its on-going viability and efficiency.</p>	Support	Aurora submits that its infrastructure assets are significant physical resources and are essential to the social and economic wellbeing of the community. Such infrastructure can be located in areas subject to environmental constraints and is the subject of considerable financial investment and unlikely	Retain Policy 30.2.6.1

		<p>to be readily replaced or duplicated.</p> <p>It is therefore appropriate to provide for the maintenance or upgrading of such infrastructure.</p> <p>This policy should be retained.</p>	
<p>Policy 30.2.6.4</p> <p>Provide for the sustainable, secure and efficient use and development of the electricity transmission network, including within the transmission line corridor, and to protect activities from the adverse effects of the electricity transmission network, including by:</p> <ul style="list-style-type: none"> Controlling the proximity of buildings, structures and vegetation to existing transmission corridors Discouraging sensitive activities from locating within or near to the electricity transmission National Grid Yard to minimise potential reverse sensitivity effects on the transmission network Managing subdivision within or near to electricity transmission corridors to achieve the outcomes of this policy to facilitate good amenity and urban design outcomes Not compromising the operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works. 	Oppose	<p>Aurora strongly supports the need to protect critical network utilities from the effects of encroaching reverse sensitivity.</p> <p>However, as currently focused, the proposed Plan only recognises such an effect on the transmission line corridor. Aurora owns and operates undesignated network utility assets that are critical, not only to the District, but also the region (i.e., the high voltage sub-transmission networks). Such critical assets are at risk from reverse sensitivity effects; and, similar to the transmission line corridor, should also be afforded the same level of protection. Development within such corridors will have similar effects, regardless of who the asset owner is.</p>	<p>Amend Policy 30.2.6.4 as follows:</p> <p>Provide for the sustainable, secure and efficient use and development of the electricity transmission <u>and distribution</u> networks, including within the transmission line corridor, <u>the Critical Electricity Line corridor</u>, and to protect activities from the adverse effects of the electricity transmission <u>and distribution</u> networks, including by:</p> <ul style="list-style-type: none"> Controlling the proximity of buildings, structures and vegetation to existing transmission <u>and Critical Electricity Line</u> corridors Discouraging sensitive activities from locating within or near to the electricity transmission National Grid Yard to minimise potential reverse sensitivity effects on the transmission network Managing subdivision within or near to electricity transmission <u>and Critical Electricity Line</u> corridors to achieve the outcomes of this policy to facilitate good amenity and urban design outcomes Not compromising the operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.
<p>Policy 30.2.6.5</p> <p>Recognise the presence and function of established network utilities, and their locational and operational requirements, by managing land use, development and/or subdivision in locations that could compromise their safe and efficient operation.</p>	Support	<p>Aurora is supportive of provisions that seek to protect infrastructure corridors now and into the future. Regionally Significant Infrastructure can be vulnerable to inappropriate subdivision or proximity to land use development, as such activities can restrict access and affect the ability to maintain network assets. The protection of such corridors will assist in ensuring that Aurora can continue to provide a resilient electricity network.</p>	<p>Retain Policy 30.2.6.5</p>

<p>Objective 30.2.7 Avoid, remedy or mitigate the adverse effects of utilities on surrounding environments, particularly those in or on land of high landscape value, and within special character areas.</p>	Support in part	Aurora supports this objective in so far as it seeks to ensure that potential adverse effects of <u>Regionally Significant Infrastructure</u> are minimised; particularly in instances where assets are located in areas of significant value.	Retain Objective 30.2.7
<p>Policy 30.2.7.1 Reduce adverse effects associated with utilities by:</p> <ul style="list-style-type: none"> • Avoiding or mitigating their location on sensitive sites, including heritage and special character areas, Outstanding Natural Landscapes and Outstanding Natural Features, and skylines and ridgelines • Encouraging co-location or multiple use of network utilities where this is efficient and practicable in order to avoid, remedy or mitigate adverse effects on the environment • Ensuring that redundant utilities are removed • Using landscaping and or colours and finishes to reduce visual effects • Integrating utilities with the surrounding environment; whether that is a rural environment or existing built form. 	Oppose	<p>Aurora is supportive of provisions that seek to reduce adverse effects associated with utilities. However, the form and nature of Aurora's assets and the fact that they are linear in nature means that it is not always possible to avoid or mitigate effects. Using landscaping and colours or finishes will not, in some cases, reduce visual effects and, in some cases, utilising such mitigation measures can compromise the operation of the asset. As such the policy should recognise that such mitigation measures can only be applied where economically viable and technically feasible.</p> <p>Further, Aurora's assets are designed for the purpose of supplying electricity and, due to their linear nature, they are not easily integrated into the surrounding environment. As such, Aurora considers that the clause relating to integration of utilities with the surrounding environment should be deleted.</p>	<p>Amend Policy 30.2.7.1 as follows:</p> <p>Reduce adverse effects associated with utilities by:</p> <ul style="list-style-type: none"> • Avoiding or mitigating their location on sensitive sites, including heritage and special character areas, Outstanding Natural Landscapes and Outstanding Natural Features, and skylines and ridgelines • Encouraging co-location or multiple use of network utilities where this is efficient and practicable in order to avoid, remedy or mitigate adverse effects on the environment • Ensuring that redundant utilities are removed • Using landscaping and or colours and finishes to reduce visual effects <u>where economically viable and technically feasible</u> • Integrating utilities with the surrounding environment; whether that is a rural environment or existing built form.
<p>Policy 30.2.7.2 Require the undergrounding of services in new areas of development where technically feasible.</p>	Oppose in part	Aurora submits that it is not always economically viable or technically feasible to place network utility infrastructure underground, particularly in instances where the existing reticulation is overhead. It is appropriate that the economic	<p>Amend Policy 30.2.7.2 as follows:</p> <p>Require the undergrounding of services in new areas of development <u>where economically viable and technically feasible.</u></p>

		viability and technical feasibility of such proposals is recognised and provided for.	
<p>Policy 30.2.7.3 Encourage the replacement of existing overhead services with underground reticulation or the upgrading of existing overhead services where technically feasible.</p>	Oppose	<p>Aurora submits that it is not always economically viable or technically feasible to place network utility infrastructure underground particularly in instances where the existing reticulation is overhead. Further, the placement of existing services underground is not warranted in all cases. While Aurora acknowledges that benefits can be accrued in residential areas, in terms of amenity, such benefits are not required, particularly in Industrial and Rural zones.</p> <p>Further, Aurora considers that Policy 30.2.6.1 provides for the maintenance or upgrading of a utility to ensure its on-going viability and efficiency. Aurora therefore considers that including upgrading in Policy 30.2.7.3 is unnecessary duplication and should be removed.</p>	<p>Amend Policy 30.2.7.3 as follows: Encourage the replacement of existing overhead services with underground reticulation <u>within residential zones</u> or the upgrading of existing overhead services where technically feasible.</p>
<p>Policy 30.2.7.4 Take account of economic and operational needs in assessing the location and external appearance of utilities.</p>	Support	<p>Aurora submits that it is appropriate to take into consideration the economic and operational needs when assessing the location and external appearance of utilities.</p>	Retain Policy 30.2.7.4
<p>Policy 30.3.2.3 New Zealand Electrical Code of Practice for Electrical Safe Distances Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (“NZECP 34:2001”) is mandatory under the Electricity Act 1992. All activities regulated by the NZECP 34, including any activities that are otherwise permitted by the District Plan must comply with this legislation.</p>	Support	<p>Aurora submits that it is appropriate for the New Zealand Electrical Code of Practice (“NZECP 34:2001”) for Electrical Safe Distances is recognised within the District Plan. NZECP 34:2001 is given legal effect by regulation 17 of the Electricity (Safety) Regulations 2010 which inter alia sets out the penalties for contravention of the regulation. However, as discussed in other parts of this submission, Aurora</p>	Retain Policy 30.3.2.3

		consider that its Critical Electricity Lines and Substations require specific protection under the District Plan as the requirements of NZECP 34:2001 are not always adhered to and this can compromise Aurora's assets.	
<p>Rule 30.4.6 - Non-renewable Electricity Generation - Permitted Activity</p> <p>Non-renewable Electricity Generation where the generation only supplies activities on the site on which it is located and involves either:</p> <ul style="list-style-type: none"> • Standby generators associated with community, health care, and utility activities; or • Generators that are part of a Stand-Alone Power System on remote sites that do not have connection to the local distributed electricity network. <p><i>Note – Diesel Generators must comply with the provisions of Chapter 36 (Noise) and Hazardous Substances (Chapter 16 ODP)</i></p>	Oppose in part	<p>Aurora supports the intent of this Rule, whereby non-renewable electricity generation is permitted in the outlined instances; however, it questions why the provisions relating to noise should apply.</p> <p>Emergency and backup generators provide a vital role in maintaining supply of electricity during times of supply interruption. Aurora considers that the imposition of a requirement to comply with the noise provisions in Chapter 36 are overly onerous, given the positive effects provided by the supply of electricity. Aurora considers that noise from emergency and back-up electricity generators should be explicitly provided for as a <i>Permitted Activity</i>.</p>	<p>Amend Rule 30.4.6 as follows:</p> <p>Non-renewable Electricity Generation where the generation only supplies activities on the site on which it is located and involves either:</p> <ul style="list-style-type: none"> • Standby generators associated with community, health care, and utility activities; or • Generators that are part of a Stand-Alone Power System on remote sites that do not have connection to the local distributed electricity network. <p><i>Note – Diesel Generators (excluding temporary operation of back-up and emergency generators) must comply with the provisions of Chapter 36 (Noise) and Hazardous Substances (Chapter 16 ODP)</i></p>
<p>Rule 30.4.9 – Minor Upgrading - Permitted Activities</p>	Support	<p>Aurora submits that it is appropriate that activities associated with minor upgrading should be permitted. However, Aurora is concerned with the activities defined as <i>Minor Upgrading</i> in Chapter 2 of the Proposed Plan.</p> <p>Aurora seeks that Rule 30.4.9 be retained, but the definition of <i>Minor Upgrading</i> be amended.</p>	<p>Retain Rule 30.4.9</p> <p>Amend definition of Minor Upgrading as proposed above.</p>
<p>Rule 30.4.10 – Buildings (that are not for National Grid Sensitive Activities), Structures and Earthworks within National Grid Corridors - Permitted Activities</p>	Support in part	<p>Aurora supports provisions that allow buildings, structures and earthworks within the National</p>	<p>Amend Rule 30.4.10 as follows:</p> <p>Buildings (that are not for National Grid Sensitive Activities), Structures and Earthworks within National Grid and Critical Electricity Lines Corridors</p>

(subject to compliance with Rules 30.5.10 and 30.5.11)		Grid Corridor. However, Aurora seeks that Rule 30.4.10 is extended to include consideration of Critical Electricity Lines and the new provisions proposed.	(subject to compliance with Rules 30.5.10, and 30.5.11 and Rule xxxx relating specifically to <u>Critical Electricity Lines.</u>)
<p>Rule 30.4.11 - Lines and Supporting Structures - Controlled Activities</p> <p>A conductor line, or support structure for overhead lines, to convey electricity (at a voltage of equal to or less than 110kV at a capacity of equal to or less than 100MVA); or overhead lines for any other purpose including telecommunications.</p> <p>Control is reserved to all of the following:</p> <ul style="list-style-type: none"> • Location • Route • Height • Appearance, scale and visual effects • Where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: an assessment by a suitably qualified person is provided that addresses the nature and degree of risk the hazard(s) pose to people and property, whether the proposal will alter the risk to any site, and the extent to which such risk can be avoided or sufficiently mitigated. 	Oppose in part	<p>Aurora supports the intent of the rule, that the installation of lines and supporting structures are controlled activities. However, Aurora submits that the rule should be amended to make it clear that the rule does not apply to minor upgrading.</p> <p>In addition, Aurora is concerned that Council has reserved <i>Appearance, scale and visual effects</i> as matters of control. Given the linear nature of Aurora's network there will be instances where the installation of new assets will have a visual effect. However, mitigation measures such as planting will not be technically feasible to reduce the visual effect. In addition, requirements to paint support structures are inappropriate as this can lead to costly maintenance requirements that can affect the integrity of the support structure.</p> <p>In terms of the requirement to undertake a hazard assessment for overhead line construction, it is unclear how this would apply to a linear activity such as an overhead electricity line. The definition of "Gross Floor Area" under the proposed Plan means <i>"the sum of the gross area of the several floors of all buildings on a site, measured from the exterior faces of the exterior walls, or from the centre lines of walls separating two buildings"</i>. This</p>	<p>Amend Rule 30.4.11 as follows:</p> <p>A conductor line, or support structure for <u>new</u> overhead lines (<u>excluding minor upgrading</u>), to convey electricity (at a <u>nominal</u> voltage of equal to or less than 110kV at a capacity of equal to or less than 100MVA); or overhead lines for any other purpose including telecommunications.</p> <p>Control is reserved to all of the following:</p> <ul style="list-style-type: none"> • Location • Route • Height • Appearance, scale and visual effects • Where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: an assessment by a suitably qualified person is provided that addresses the nature and degree of risk the hazard(s) pose to people and property, whether the proposal will alter the risk to any site, and the extent to which such risk can be avoided or sufficiently mitigated.

		<p>clearly does not apply to overhead lines.</p> <p>Aurora acknowledges that there may be cases where it is necessary to locate <u>Regionally Significant Infrastructure</u> in areas subject to hazards, and that this risk can be managed through appropriate measures. Infrastructure providers, such as Aurora, are in the best position to assess the risks of locating network utility structures (involving non-habitable buildings) in potential hazard areas in terms of continuity of electricity services.</p>	
<p>Rule 30.4.12.3 - Lines and Supporting Structures - Discretionary Activities</p> <p>Erecting any support structures for overhead lines to convey electricity (at a voltage of equal to or less than 110kV at a capacity of equal to or less than 100MVA); or overhead lines for any other purposes including telecommunications in any Outstanding Natural Feature or Outstanding Natural Landscape or Significant Natural Areas.</p>	Oppose in part	<p>Aurora is supportive of provisions that seek to address potential adverse effects from utilities on the landscapes and features provided for under s6 of the RMA. However, Aurora submits that the requirement for consent for “any” structure in these areas is overly restrictive, and could result in delays associated with minor upgrading of <u>Regionally Significant Infrastructure</u>. Aurora submit that an exemption should be provided for minor upgrading in these areas.</p>	<p>Amend Rule 30.4.12.3 as follows:</p> <p>Erecting any support structures for overhead lines (<u>excluding minor upgrading</u>) to convey electricity (at a voltage of equal to or less than 110kV at a capacity of equal to or less than 100MVA); or overhead lines for any other purposes including telecommunications in any Outstanding Natural Feature or Outstanding Natural Landscape or Significant Natural Areas.</p> <p>OR</p> <p>If the relief sought by Aurora is not accepted, then a <i>Controlled Activity</i> consent category should apply to <i>Minor Upgrading</i> in these identified areas.</p> <p>And any other consequential changes required.</p>
<p>Rule 30.4.15 - Buildings (associated with a Utility) - Controlled Activity</p> <p>The addition, alteration or construction of buildings greater than 10m² in area and 3m in height (other than masts for any telecommunication and radio communication facility, navigation or meteorological communication facility or supporting structures for lines). However, this rule shall not apply where the provisions of the underlying zone or a District Wide rule specify a more restrictive activity status.</p> <p>Control is reserved to all of the following:</p> <ul style="list-style-type: none"> • Location • External appearance and visual effects • Associated earthworks 	Oppose	<p>Aurora is concerned that buildings associated with a utility will not be adequately provided for, if individual zone provisions are applied to development needs. Aurora submits that it is appropriate for utility buildings greater than 10m³ in area and 3m in height to be provided for as a controlled activity in all zones. Having to comply with the underlying zone or District Wide</p>	<p>Amend Rule 30.4.15 as follows:</p> <p>Buildings (associated with a Utility)</p> <p>The addition, alteration or construction of buildings greater than 10m² in area and 3m in height (other than masts for any telecommunication and radio communication facility, navigation or meteorological communication facility or supporting structures for lines). However, this rule shall not apply where the provisions of the underlying zone or a District Wide rule specify a more restrictive activity status.</p> <p>Control is reserved to all of the following:</p> <ul style="list-style-type: none"> • Location • External appearance and visual effects

<ul style="list-style-type: none"> • Parking and access • Landscaping • Where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: an assessment by a suitably qualified person is provided that addresses the nature and degree of risk the hazard(s) pose to people and property, whether the proposal will alter the risk to any site, and the extent to which such risk can be avoided or sufficiently mitigated. 		<p>rule provisions could result in utility buildings requiring consent as restricted discretionary or discretionary activities. This will have the effect of reducing the certainty required by <u>Regionally Significant Infrastructure</u> providers to undertake improvements to their networks. As such Aurora submits that Rule 30.4.15 should be amended to remove the requirement to comply with the underlying zone or District Wide Rule</p>	<ul style="list-style-type: none"> • Associated earthworks • Parking and access • Landscaping • Where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: an assessment by a suitably qualified person is provided that addresses the nature and degree of risk the hazard(s) pose to people and property, whether the proposal will alter the risk to any site, and the extent to which such risk can be avoided or sufficiently mitigated.
<p>Rule 30.4.16 - Buildings (associated with a Utility) – Discretionary Activity</p> <p>Any addition, alteration or construction of buildings and structures, (other than masts for any telecommunication and radio communication facility, navigation or meteorological communication facility or supporting structures for lines) in:</p> <ul style="list-style-type: none"> • Any Significant Natural Areas • The Arrowtown Residential Historic Management Zone. • The Remarkables Park Zone <p>However, this rule shall not apply where the provisions of the underlying zone or a District Wide matter specify a more restrictive activity status.</p>	Oppose	<p>Aurora submits that provision should be made for small scale buildings and structures within the significant natural areas, the Arrowtown Residential Historic Management Zone and the Remarkables Park Zone. Given the small scale nature of electricity cabinets and kiosks, and the necessity to provide secure electricity supplies, Aurora submits that the exemptions provided for within Rule 30.4.16 should be extended.</p>	<p>Amend Rule 30.4.16 as follows:</p> <p>Any addition, alteration or construction of buildings and structures, (other than masts for any telecommunication and radio communication facility, navigation or meteorological communication facility, <u>electricity cabinets, kiosks</u> or supporting structures for lines) in:</p> <ul style="list-style-type: none"> • Any Significant Natural Areas • The Arrowtown Residential Historic Management Zone. • The Remarkables Park Zone <p>However, this rule shall not apply where the provisions of the underlying zone or a District Wide matter specify a more restrictive activity status.</p>
STANDARDS FOR UTILITIES			
<p>Rule 30.5.6 – Setback From Internal Boundaries And Road Boundaries - Discretionary Activity</p> <p>Where the utility is a building, it shall be set back in accordance with the internal and road boundary setbacks for accessory buildings in the zone in which it is located.</p>	Neutral	<p>Aurora notes that the definition of <i>Building</i> within the Building Act 2004, specifically excludes “a <i>pylon, free-standing communication tower, power pole, or telephone pole that is a NUO system or part of a NUO system</i>” (Section 9(ab)). As such the setback requirements for accessory buildings will not apply to Aurora’s support structures.</p>	No Change.
<p>Rule 30.5.8 – Height – Discretionary Activity</p> <p>All buildings or structures, (excluding masts and antennae for any telecommunication and radio-communication facility, navigation or meteorological communication facility) shall comply with the relevant maximum height provisions for buildings of the zone they are located in.</p>	Oppose	<p>Aurora is concerned that provision has not been made within this Rule for “support structures for overhead lines”. The height of electricity support structures are dictated by Electricity Industry Standards</p>	<p>Amend Rule 30.5.8 – Height as follows:</p> <p>Height</p> <p>All buildings or structures, (excluding masts and antennae for any telecommunication and radio-communication facility, navigation or meteorological communication facility <u>or support structures for overhead lines</u>) shall comply with the relevant maximum height provisions for buildings of the zone they are located in.</p>

		and Regulations to ensure appropriate safety clearances are achieved. Having to comply with the relevant maximum height provisions for buildings of the zone they are located in could potentially result in Aurora requiring resource consent to erect any new support structure. Aurora considers this is overly restrictive and would have major implications for the operation of its <u>Regionally Significant Infrastructure</u> .	
<p>Rule 30.5.10 Buildings and Structures within the National Grid Yard</p> <p>30.5.10.1 A non-conductive fence located 5m or more from any National Grid Support Structure and no more than 2.5m in height.</p> <p>30.5.10.2 Any utility within a transport corridor or any part of electricity infrastructure that connects to the National Grid.</p> <p>30.5.10.3 Any new non-habitable building less than 2.5m high and 10m² in floor area.</p> <p>30.5.10.4 Any non-habitable building or structure used for agricultural activities provided that they are:</p> <ol style="list-style-type: none"> less than 2.5m high Located at least 12m from a National Grid Support Structure Not a milking shed/dairy shed (excluding the stockyards and ancillary platforms), or a commercial glasshouse. <p>30.5.10.5 Alterations to existing buildings that do not alter the building envelope.</p> <p><i>Note – Refer to the Definitions for illustration of the National Grid Yard.</i></p>	Oppose in part	<p>Aurora submit that as currently worded Rule 30.5.10 is confusing. It is assumed that the activities listed in Rules 30.5.10.1 – 30.5.10.5 are activities that <u>are</u> anticipated within the National Grid yard. The inclusion of Rule 30.5.10.2 relating to “<i>any utility within a transport corridor or any part of electricity infrastructure that connects to the National Grid</i>” is supported.</p> <p>However, Aurora submits that Rule 30.5.10 should be amended to ensure it is clear that the activities listed in Rules 30.5.10.1 – 30.5.10.5 are permitted within the National Grid Yard.</p>	<p>Amend Rule 30.5.10 Buildings and Structures <u>permitted</u> within the National Grid Yard include: being:</p> <p>30.5.10.1 A non-conductive fence located 5m or more from any National Grid Support Structure and no more than 2.5m in height.</p> <p>30.5.10.2 Any utility within a transport corridor or any part of electricity infrastructure that connects to the National Grid.</p> <p>30.5.10.3 Any new non-habitable building less than 2.5m high and 10m² in floor area.</p> <p>30.5.10.4 Any non-habitable building or structure used for agricultural activities provided that they are:</p> <ol style="list-style-type: none"> less than 2.5m high Located at least 12m from a National Grid Support Structure Not a milking shed/dairy shed (excluding the stockyards and ancillary platforms), or a commercial glasshouse. <p>30.5.10.5 Alterations to existing buildings that do not alter the building envelope.</p> <p><i>Note – Refer to the Definitions for illustration of the National Grid Yard.</i></p>
<p>Rule 30.5.11 - Earthworks within the National Grid Yard being:</p> <p>30.5.11.1 Earthworks within 2.2 metres of a National Grid pole support structure or stay wire shall be no deeper than 300mm.</p> <p>30.5.11.2 Earthworks between 2.2 metres to 5 metres of a National Grid pole support structure or stay wire shall be no deeper than 750mm.</p> <p>30.5.11.3 Earthworks within 6 metres of the outer visible edge of a National Grid Transmission Tower Support Structure shall be no deeper than 300mm.</p>	Support in part	<p>Aurora supports the exemption provided in Rule 30.5.11.7 for “<i>Earthworks undertaken in the course of constructing or maintaining utilities</i>” within the National Grid Yard.</p>	Retain Rule 30.5.11.7

<p>30.5.11.4 Earthworks between 6 metres to 12 metres from the outer visible edge of a National Grid Transmission Tower Support structure shall be no deeper than 3 metres.</p> <p>30.5.11.5 Earthworks shall not create an unstable batter that will affect a transmission support structure.</p> <p>30.5.11.6 Earthworks shall not result in a reduction in the existing conductor clearance distance below what is required by the New Zealand Electrical Code of Practice 34:2001.</p> <p>The following earthworks are exempt from the rules above:</p> <p>30.5.11.7 Earthworks undertaken in the course of constructing or maintaining utilities</p> <p>30.5.11.8 Earthworks undertaken as part of agricultural activities or domestic gardening</p> <p>30.5.11.9 Repair sealing, resealing of an existing road, footpath, farm track or driveway <i>Note – Refer to the Definitions for illustration of the National Grid Yard.</i></p>			
<p>Insert New Provisions – Critical Electricity Lines – Utility Chapter</p>		<p>Aurora is concerned that issues associated with reverse sensitivity for Critical Electricity Lines (CELs) have not been adequately addressed within the Proposed Plan. Council have associated issues of reverse sensitivity primarily with the National Grid with little regard, or recognition that such effects can impact on the sub-transmission and distribution assets of other network utility operators.</p> <p>The District's sub-transmission network is an element of electricity distribution that can be adversely effected by reverse sensitivity to the same degree as other high voltage transmission lines.</p> <p>The Proposed Otago Regional Policy Statement 2015 includes provisions that seek to <i>recognise the functional needs of infrastructure of regional and national importance</i> (Proposed</p>	<p>Insert New Provision – Critical Electricity Lines – Land Use</p> <p><u>Critical Electricity Lines – Land Use</u> <u>NOTE: The following provisions apply district wide in addition to any other provisions in this Plan applicable to the same areas or site. Critical Electricity Lines (CEL's) and substations are the key components of the electricity network in the Queenstown Lakes District. To provide a resilient electricity network the use and development of CEL's and substations must be sustainable, secure and efficient. CEL's and substations can be vulnerable to inappropriate subdivision or building location to the extent that they can restrict access and affect the ability to maintain the CEL's (lines, cables and support structures). Trees planted too close to lines or cables can disrupt supply. CEL's are, or have the potential to be, critical to the quality, reliability and security of electricity supply throughout the district or region. These lines contribute to the social and economic wellbeing and health and safety of the district or region and are lines that:</u></p> <ul style="list-style-type: none"> • <u>Supply essential public services such as the hospital, civil defence facilities or Lifeline sites;</u> <u>or</u> • <u>Supply large (1MW or more) industrial or commercial electricity consumers; or</u> • <u>Supply 1000 or more consumers; or</u> • <u>Are difficult to replace with an alternative electricity supply if they are compromised.</u> <p><u>The locations of CEL's and designated substations are identified in the planning maps of the District Plan.</u></p> <p><u>The following activities are permitted activities:</u></p> <ol style="list-style-type: none"> 1. <u>Within 10m of a CEL or the designation boundary of a substation:</u> <ol style="list-style-type: none"> i. <u>Any building or structure that does not require building consent; or</u>

	<p>Policy 3.4.1) and to <i>protect infrastructure corridors for infrastructure needs, now and for the future</i> (Proposed Policy 3.4.2).</p> <p>As such the <u>Regionally Significant Infrastructure</u> assets owned by Aurora should be addressed as part of the Proposed District Plan including the provision for CEL's.</p>	<p>ii. <u>Alteration of any building that does not exceed outside the envelope or footprint of the existing building; or</u></p> <p>iii. <u>Earthworks that:</u></p> <p>a. <u>Are not directly above an underground cable(s); and</u></p> <p>b. <u>Do not result in a reduction of existing ground clearance distances from overhead lines below the minimums prescribed in the New Zealand Code of Practice 34:2001 (NZECP 34:2001); and</u></p> <p>c. <u>Are in accordance with NZECP 34:2001.</u></p> <p>2. <u>Within 20m of a CEL or the designated boundary of a substation:</u></p> <p>i. <u>Planting of trees other than shelterbelts, production forestry or commercial horticultural operations.</u></p> <p>3. <u>Activities that fail to meet the standards in (1) and (2) above, provided that prior to the commencement of any works:</u></p> <p>i. <u>Written notification has been provided to the Council; and</u></p> <p>ii. <u>The proposed activity is being carried out in accordance with the Electricity Act 1992 and associated regulations (NZECP 34:2001, the Electricity (Hazards from Trees) Regulations 2003 (SR 2003/375), and the Electricity (Safety) Regulations 2010);</u></p> <p>OR</p> <p>3.1 <u>The proposed activity is being carried out by a network utility operator or territorial authority in accordance with NZECP 34:2001.</u></p> <p><u>Note:</u> <u>Specified distances from CEL's are to be measured from a point directly below the centreline of the line or cluster of lines, as shown in the Critical Electricity Line Definition.</u></p> <p><u>Insert New Restricted Discretionary Rule - Land Use</u></p> <p><u>Rule xxx</u> <u>Activities that do not meet the requirements for permitted activities, require resource consent as a restricted discretionary activity. Discretion will be restricted to:</u></p> <p>i. <u>the safe and efficient operation and maintenance of the electricity supply network, including:</u></p> <p>a. <u>The use, design and location of buildings; and</u></p> <p>b. <u>The mature size, growth rate, location, and fall zone of any associated tree planting, including landscape planting and shelterbelts; and</u></p> <p>c. <u>Compliance with NZECP 34:2001; and</u></p> <p>d. <u>Effects on public health and safety; and</u></p> <p>e. <u>Effects on access to CEL's, designated substations and associated infrastructure for maintenance purposes.</u></p> <p>Insert Aurora's Critical Electricity Lines onto the relevant Planning Maps.</p>
<p>Insert new provisions relating to Critical Electricity Lines in all of the relevant zones outlined below:</p>	<p>Aurora is concerned that issues associated with reverse sensitivity for Critical Electricity</p>	<p>Insert New Provision – Critical Electricity Lines – Land Use</p> <p><u>Critical Electricity Lines – Land Use</u></p>

Zone	Applicable Rules & Standards
Low Density Residential Zone	Rules 7.4 and 7.5
Medium Density Residential Zone	Rules 8.4 and 8.5
High Density Residential Zone	Rules 9.4 and 9.5
Arrowtown Residential Historic Management Zone	Rules 10.4 and 10.5
Large Lot Residential	Rules 11.4 and 11.5
Queenstown Town Centre	Rules 12.4 and 12.5
Wanaka Town Centre	Rules 13.4 and 13.5
Arrowtown Town Centre	Rules 14.4 and 14.5
Local Shopping Centres	Rules 15.4 and 15.5
Business Mixed Use Zone	Rules 16.4 and 16.5
Rural Zone	Rules 21.4 and 21.5
Rural Residential and Lifestyle	Rules 22.4 and 22.5
Gibbston Character Zone	Rules 23.4 and 23.5

Lines (CELs) have not been adequately addressed within the Proposed Plan. Council has associated issues of reverse sensitivity primarily with the National Grid, with little regard or recognition that such effects can impact on the sub-transmission and distribution assets of other network utility operators.

The District's sub-transmission network is an element of electricity distribution that can be adversely effected by reverse sensitivity to the same degree as other high voltage transmission lines.

The Proposed Otago Regional Policy Statement 2015 includes provisions that seek to *recognise the functional needs of infrastructure of regional and national importance* (Proposed Policy 3.4.1) and to *protect infrastructure corridors for infrastructure needs, now and for the future* (Proposed Policy 3.4.2).

As such the Regionally Significant Infrastructure assets owned by Aurora should be addressed as part of the Proposed District Plan including the provision for CEL's.

NOTE: The following provisions apply district wide in addition to any other provisions in this Plan applicable to the same areas or site. Critical Electricity Lines (CEL's) and substations are the key components of the electricity network in the Queenstown Lakes District. To provide a resilient electricity network the use and development of CEL's and substations must be sustainable, secure and efficient. CEL's and substations can be vulnerable to inappropriate subdivision or building location to the extent that they can restrict access and affect the ability to maintain the CEL's (lines, cables and support structures). Trees planted too close to lines or cables can disrupt supply. CEL's are, or have the potential to be, critical to the quality, reliability and security of electricity supply throughout the district or region. These lines contribute to the social and economic wellbeing and health and safety of the district or region and are lines that:

- Supply essential public services such as the hospital, civil defence facilities or Lifeline sites; or
- Supply large (1MW or more) industrial or commercial electricity consumers; or
- Supply 1000 or more consumers; or
- Are difficult to replace with an alternative electricity supply if they are compromised.

The locations of CEL's and designated substations are identified in the planning maps of the District Plan.

The following activities are permitted activities:

2. Within 10m of a CEL or the designation boundary of a substation:
 - iv. Any building or structure that does not require building consent; or
 - v. Alteration of any building that does not exceed outside the envelope or footprint of the existing building; or
 - vi. Earthworks that:
 - d. Are not directly above an underground cable(s); and
 - e. Do not result in a reduction of existing ground clearance distances from overhead lines below the minimums prescribed in the New Zealand Code of Practice 34:2001 (NZECP 34:2001); and
 - f. Are in accordance with NZECP 34:2001.
4. Within 20m of a CEL or the designated boundary of a substation:
 - ii. Planting of trees other than shelterbelts, production forestry or commercial horticultural operations.
5. Activities that fail to meet the standards in (1) and (2) above, provided that prior to the commencement of any works:
 - iii. Written notification has been provided to the Council; and
 - iv. The proposed activity is being carried out in accordance with the Electricity Act 1992 and associated regulations (NZECP 34:2001, the Electricity (Hazards from Trees) Regulations 2003 (SR 2003/375), and the Electricity (Safety) Regulations 2010);

OR

			<p>5.1 <u>The proposed activity is being carried out by a network utility operator or territorial authority in accordance with NZECP 34:2001.</u></p> <p><u>Note:</u> Specified distances from CEL's are to be measured from a point directly below the centreline of the line or cluster of lines, as shown in the Critical Electricity Line Definition.</p> <p><u>Insert New Restricted Discretionary Rule - Land Use</u></p> <p><u>Rule xxx</u> Activities that do not meet the requirements for permitted activities, require resource consent as a restricted discretionary activity. Discretion will be restricted to:</p> <p><u>i. the safe and efficient operation and maintenance of the electricity supply network, including:</u></p> <ul style="list-style-type: none"> f. <u>The use, design and location of buildings; and</u> g. <u>The mature size, growth rate, location, and fall zone of any associated tree planting, including landscape planting and shelterbelts; and</u> h. <u>Compliance with NZECP 34:2001; and</u> i. <u>Effects on public health and safety; and</u> j. <u>Effects on access to CEL's, designated substations and associated infrastructure for maintenance purposes.</u> <p><u>Insert</u> Aurora's Critical Electricity Lines onto the relevant Planning Maps.</p>
32.0 – PROTECTED TREES			
<p>Policy 32.2.1.3 Recognise where genuine circumstances exist, the removal or significant trimming of protected trees may not be avoidable because the values of the tree for which it was protected have significantly deteriorated, or the tree is causing a hazard to life or property.</p>	Support in part	Aurora is supportive of measures that seek to protect the removal or significant trimming of protected trees. However, there will be instances where Aurora will be required to undertake significant trimming and/or removal of protected trees to ensure that the operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.	Retain Policy 32.2.1.3
33.0 INDIGENOUS VEGETATION AND BIODIVERSITY			
<p>Objective 33.2.2 Protect and enhance Significant Natural Areas.</p>	Oppose in part	Aurora is concerned that this objective is too restrictive and generic, in that it seeks to 'protect' all of the District's significant natural areas. It could	Amend Objective 33.2.2 as follows: <u>Maintain</u> Protect and <u>where appropriate</u> enhance Significant Natural Areas.

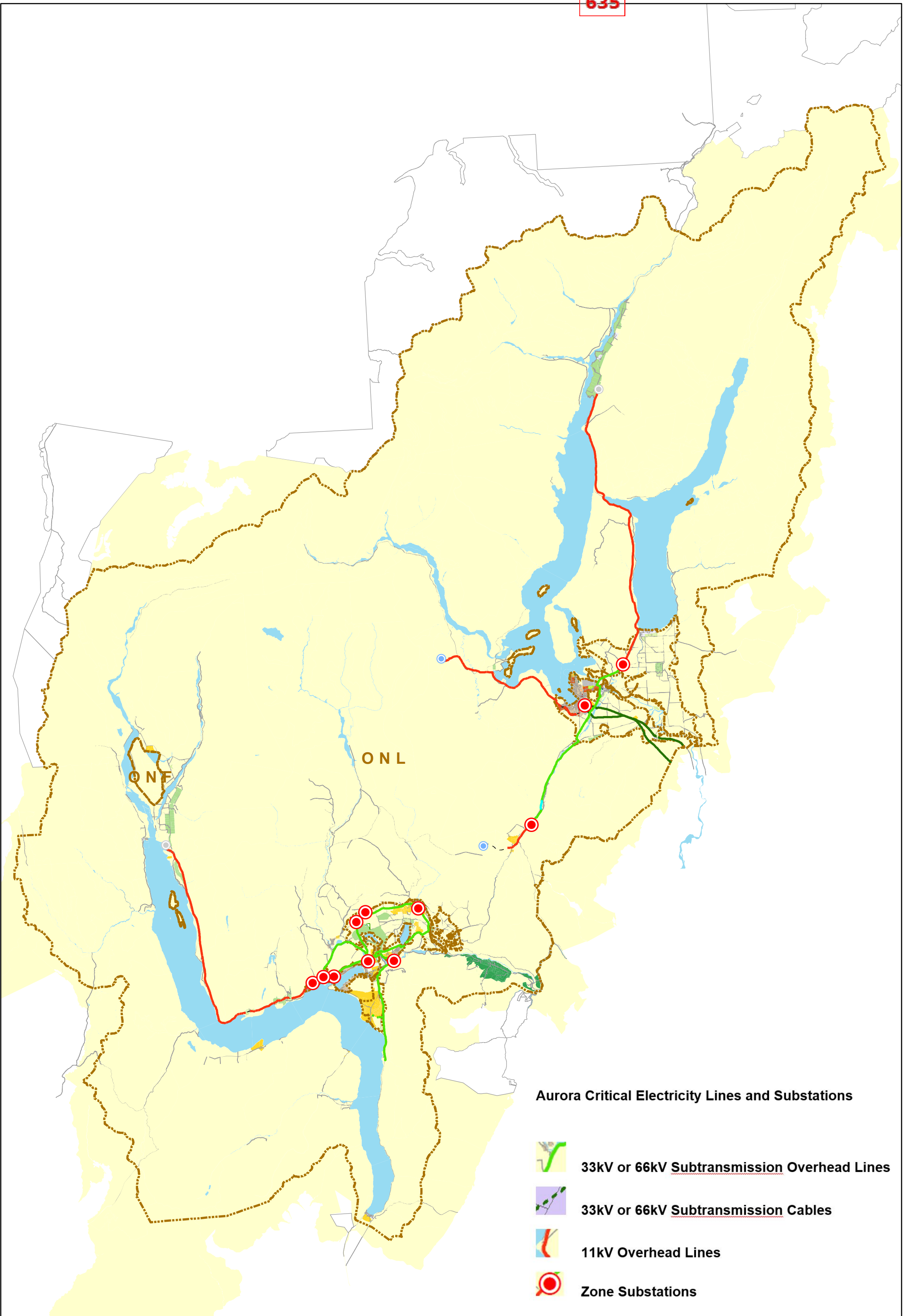
		be construed that, by seeking to protect such resources, no development or use would be deemed to be acceptable in such an environment. Given this, Aurora consider that the focus of the objective should be to identify such resources, and to maintain and, where appropriate, enhance the values that contribute to the significance of the resource.	
<p>Policy 33.2.2.1 Avoid the clearance of indigenous vegetation within Significant Natural Areas that would reduce indigenous biodiversity values.</p>	Oppose in part	Aurora is supportive of measures that seek to reduce the loss of biodiversity values, particularly in locations identified as Significant Natural areas. However, there will be instances where Aurora will be required to remove indigenous vegetation to ensure that operational efficiency of its network is maintained and to remove potential fire risks. As such Policy 33.2.2.1 should be amended to provide for such eventualities.	<p>Amend Policy 33.2.2.1 as follows: Avoid, <u>where practical</u>, the clearance of indigenous vegetation within Significant Natural Areas that would reduce indigenous biodiversity values.</p>
<p>Policy 33.2.2.2 Allow the clearance of indigenous vegetation within Significant Natural Areas only in exceptional circumstances and in circumstances where these activities will have a low impact or offer compensation commensurate to the nature and scale of the clearance.</p>	Support in part	Aurora is supportive of measures that seek to reduce the loss of biodiversity values, particularly in locations identified as Significant Natural areas. However, there will be instances where Aurora will be required to remove indigenous vegetation to ensure that operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.	<p>Retain Policy 33.2.2.2</p>
<p>33.3.4 Exemptions Rule 33.3.4.2</p>	Support	Aurora is supportive of the exemption provided in Rule 33.3.4.2 for indigenous vegetation clearance associated with the operation and maintenance of utilities. Such an	<p>Retain Rule 33.3.4.2</p>

Indigenous vegetation clearance for the operation and maintenance of existing and in service/ operational roads, tracks, drains, utilities, structures and/or fence lines, but excludes their expansion.		exemption will ensure that Aurora can maintain the operational efficiency of its existing network and remove potential fire risks.	
35.0 TEMPORARY ACTIVITIES AND RELOCATED BUILDINGS			
Objective 35.2.4 Temporary Utilities needed for other temporary activities or for emergencies are provided for.	Support	Temporary utilities including emergency and back-up generators provide a vital role in maintaining supply of electricity during times of supply interruption. Aurora considers it appropriate that provisions for such activities are provided within the Proposed Plan.	Retain Objective 35.2.4
Policy 35.2.4.1 Enable short-term use of temporary utilities needed for other temporary activities or for emergency purposes.	Support	Temporary utilities including emergency and back-up generators provide a vital role in maintaining supply of electricity during times of supply interruption. Aurora considers it appropriate that provisions for such activities are provided within the Proposed Plan.	Retain Policy 35.2.4.1
Rule 35.4.15 Temporary Utilities Any temporary utilities that: <ul style="list-style-type: none"> • Are required to provide an emergency service, or • Are related to, and required in respect of, a permitted temporary activity specified in this chapter of the District Plan. 	Support	Temporary utilities including emergency and back-up generators provide a vital role in maintaining supply of electricity during times of supply interruption. Aurora considers it appropriate that such activities are provided for as a <i>Permitted Activity</i> within the Proposed Plan.	Retain Rule 35.4.15
36.0 - NOISE			
Clarification - Rule 36.3.2.7 Sound from non-residential activities, visitor accommodation activities and sound from stationary electrical and mechanical equipment must not exceed the noise limits in Table 2 in each of the zones in which sound from an activity is received. The noise limits in Table 2 do not apply to assessment locations within the same site as the activity.	Oppose in part	Emergency and backup generators provide a vital role in maintaining supply of electricity during times of supply interruption. Aurora considers that the imposition of a noise requirement on these activities is onerous, given the positive effects provided by the supply of electricity. Aurora considers that noise from emergency and back-up electricity generators should be explicitly provided for as a <i>Permitted Activity</i> that is not	Amend Clarification - Rule 36.3.2.7 as follows: Sound from non-residential activities, visitor accommodation activities and sound from stationary electrical and mechanical equipment (<u>excluding temporary operation of emergency and backup generators</u>) must not exceed the noise limits in Table 2 in each of the zones in which sound from an activity is received. The noise limits in Table 2 do not apply to assessment locations within the same site as the activity.





				required to comply with the noise limits in Table 2.			
Rule 36.4.7 – Permitted			Oppose in part	Emergency and backup generators provide a vital role in maintaining supply of electricity during times of supply interruption. Aurora considers that the imposition of a noise requirement on these activities is onerous, given the positive effects provided by the supply of electricity. Aurora consider that noise from emergency and back-up electricity generators should be explicitly provided for as a <i>Permitted Activity</i> .	Amend Rule 36.4.7 – Permitted Activities as follows:		
<i>Table</i>	<i>Activity</i>	<i>Activity Status</i>			<i>Table</i>	<i>Activity</i>	<i>Activity Status</i>
36.4.1	Sound from vehicles on public roads or trains on railway lines (including at railway yards, railway sidings or stations).	<i>P</i>			36.4.1	Sound from vehicles on public roads or trains on railway lines (including at railway yards, railway sidings or stations).	<i>P</i>
36.4.2	Any warning device that is activated in the event of intrusion, danger, an emergency or for safety purposes, provided that vehicle reversing alarms are a broadband directional type.	<i>P</i>			36.4.2	Any warning device that is activated in the event of intrusion, danger, an emergency or for safety purposes, provided that vehicle reversing alarms are a broadband directional type.	<i>P</i>
36.4.3	Sound arising from fire stations (including rural fire stations), fire service appliance sirens and call-out sirens for volunteer brigades.	<i>P</i>			36.4.3	Sound arising from fire stations (including rural fire stations), fire service appliance sirens and call-out sirens for volunteer brigades.	<i>P</i>
36.4.5	Sound from temporary military training activities.	<i>P</i>			36.4.5	Sound from temporary military training activities.	<i>P</i>
36.4.6	In the Rural Zone and the Gibbston Character Zone, sound from farming and forestry activities, and bird scaring devices, other than sound from stationary motors and stationary equipment.	<i>P</i>			36.4.6	In the Rural Zone and the Gibbston Character Zone, sound from farming and forestry activities, and bird scaring devices, other than sound from stationary motors and stationary equipment.	<i>P</i>
36.4.7	Sound from aircraft movements within designated airports.	<i>P</i>			36.4.7	Sound from aircraft movements within designated airports.	<i>P</i>
36.4.7	Sound from telecommunications cabinets in road reserve.	<i>P</i>		36.4.7	Sound from telecommunications cabinets in road reserve.	<i>P</i>	
				36.4.8	Sound from the temporary operation of emergency and back-up electricity generators	<i>P</i>	
37.0 DESIGNATIONS							
C.69 Designation #337 – Wanaka Substation – Electricity Substation and Ancillary Purposes (RM100381)			Support in part	Aurora notes that some of the conditions attached to its designations have not been amended to reflect new proposed zoning and rules under the Proposed Plan. Aurora submit that the relevant conditions should be amended to provide greater certainty for plan users going forward.	Amend Condition 2 as follows: 2. Activities shall be so conducted that the following noise limits are not exceeded at any point within the boundary of any other site in the adjoining Rural zone: - day time (0800 - 2200 hours) 50dB LAeq (15min) - night time (2200 - 0800 hours) 40 dB LAeq (15min) and Lmax 70dBA Noise levels shall be measured and assessed in accordance with NZS 6801:1991 and NZS 6802:1991 and shall take into account special audible characteristics.		
C.74 Designation #575 Aurora – Electricity Substation and Ancillary Purposes			Support in part	Aurora notes that some of the conditions attached to its designations have not been amended to reflect new proposed zoning and rules under the Proposed Plan. Aurora submit that the relevant conditions should be amended to	Amend Condition 2 as follows: 2. Activities shall be conducted so that any new equipment installed or any new activity undertaken within the designated area shall not exceed the following noise limits, at any point within the boundary of any other site in the adjoining Rural General or Residential Zones: (a) Day time (0800-2000hrs) 50dBA L10		

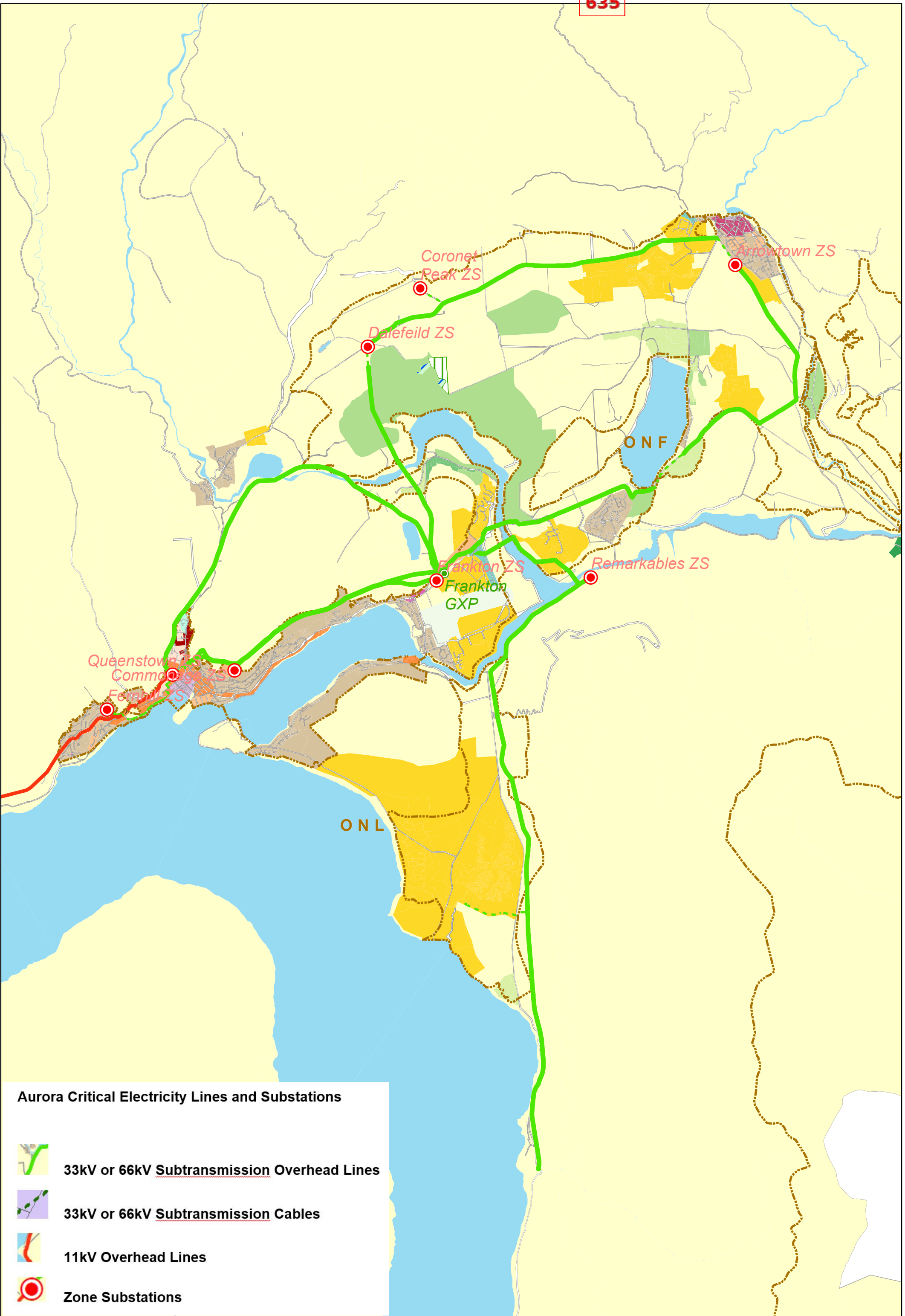
		provide greater certainty for plan users going forward.	(b) Night time (2000-0800hrs) 40dBA L10 and Lmax 70dBA. (c) Noise levels shall be measured and assessed in accordance with NZS 6801-1991 and NZS 6802- 1991 and shall take into account special audible characteristics.
C.75 Designation #570 Aurora – Electricity Substation and Ancillary Purposes	Support in part	Aurora notes that some of the conditions attached to its designations have not been amended to reflect new proposed zoning and rules under the Proposed Plan. Aurora submit that the relevant conditions should be amended to provide greater certainty for plan users going forward.	<p>Amend Condition 1 as follows:</p> <p>1. The maximum height of any building or structure on the site shall be 8m as determined in accordance with <u>the definition of building height in the District Plan Rule 7.5.6.3 iii. (Refer to Definition for interpretation of building height).</u></p> <p>Or similar or consequential amendments to same effect.</p>
C.78 Designation #571 Aurora – Riverbank Road Substation – Electricity Substation and Ancillary Purposes	Support in part	Aurora notes that some of the conditions attached to its designations have not been amended to reflect new proposed zoning and rules under the Proposed Plan. Aurora submit that the relevant conditions should be amended to provide greater certainty for plan users going forward.	<p>Amend Condition 11 as follows:</p> <p>11. Noise:</p> <p>(a) Sound shall be measured in accordance with NZS 6801:2008 and assessed in accordance with NZS 6802:2008 and shall not exceed the following noise limits at any point within the boundary of any other site in the adjoining Rural General and Rural Lifestyle Zones:</p> <p>(i) daytime (0800 to 2000 hrs) 50 dB LAeq(15 min)</p> <p>(ii) night-time (2000 to 0800 hrs) 40 dB LAeq(15 min)</p> <p>(iii) night-time (2000 to 0800 hrs) 70 dB LAFmax</p> <p>(b) The noise limits in (a) shall not apply to construction sound which shall be assessed in accordance and comply with NZS 6803:1999.</p>
Planning Maps		Update planning maps to show the location of Aurora's CEL's within the District as shown on the plans attached to this submission.	<p>Insert CEL's onto the District Plan Planning Maps</p> <p>Provide Appropriate recognition and protection of the electricity distribution network in the District by identifying Aurora's sub-transmission network and Critical Electricity Lines and substations on the Proposed District Plan maps. Such notations will have the effect of advising all interested parties in the District of development constraints in close proximity to CEL's and zone substations.</p>

ANNEXURE TWO
CRITICAL ELECTRICITY LINES







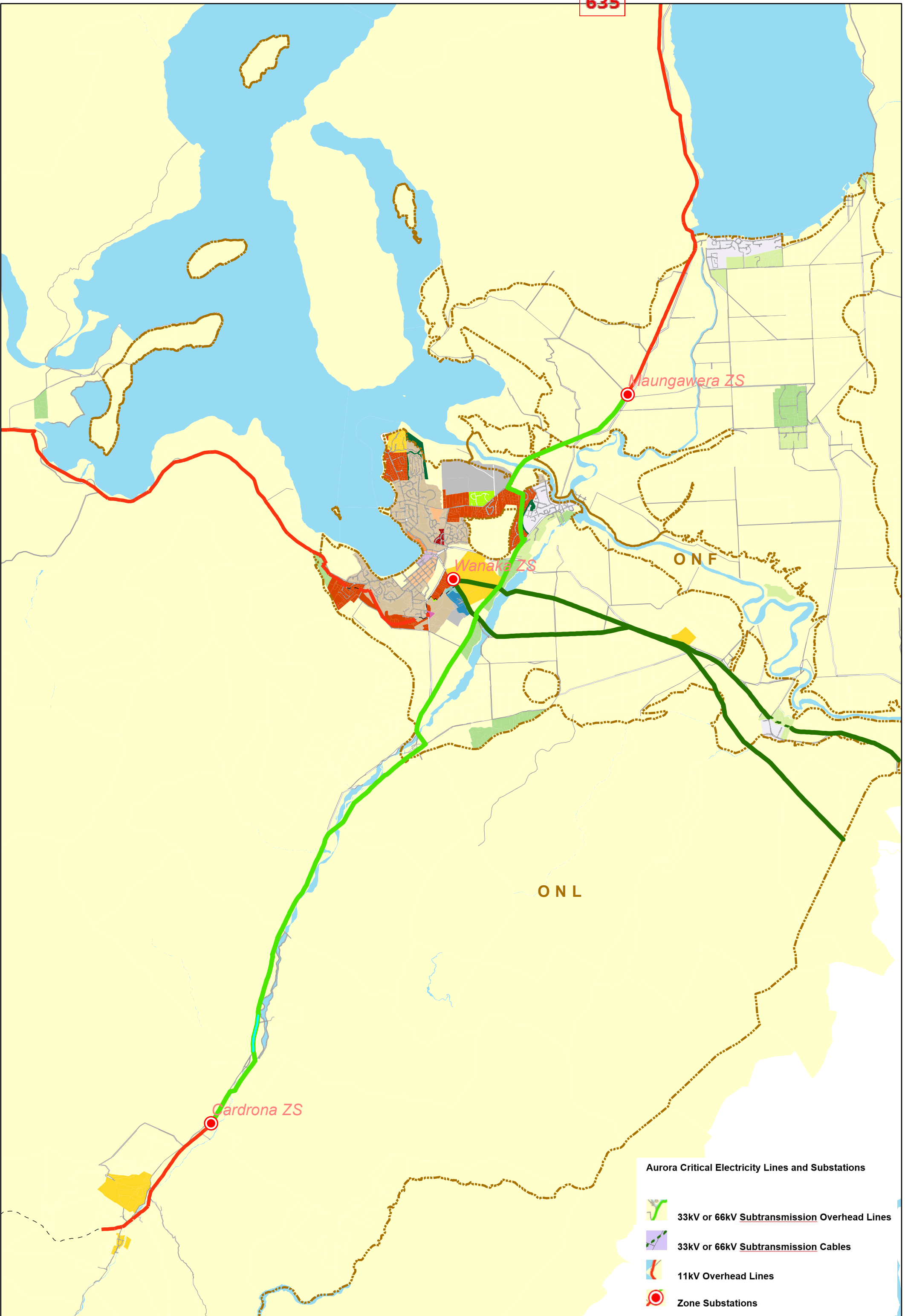
Aurora Critical Electricity Lines and Substations

-  33kV or 66kV Subtransmission Overhead Lines
-  33kV or 66kV Subtransmission Cables
-  11kV Overhead Lines
-  Zone Substations







Aurora Critical Electricity Lines and Substations

-  33kV or 66kV Subtransmission Overhead Lines
-  33kV or 66kV Subtransmission Cables
-  11kV Overhead Lines
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Aurora Critical Electricity Lines and Substations

-  33kV or 66kV Subtransmission Overhead Lines
-  33kV or 66kV Subtransmission Cables
-  11kV Overhead Lines
-  Zone Substations



Makaroa Township

ONL





Trable Cone Skifeild

Maungawera ZS

Wanaika ZS

ONF

Aurora Critical Electricity Lines and Substations

-  33kV or 66kV Subtransmission Overhead Lines
-  33kV or 66kV Subtransmission Cables
-  11kV Overhead Lines
-  Zone Substations

SUBMISSION FORM 6

CLAUSE 8 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION IN SUPPORT OF OR IN OPPOSITION TO SUBMISSIONS ON PUBLICLY NOTIFIED PROPOSED QUEENSTOWN LAKES DISTRICT PLAN – STAGE ONE 2015

To: Queenstown Lakes District Council
Private Bag 50072
QUEENSTOWN 9348

Submission on: Submissions on the Proposed Queenstown
Lakes District Plan – Stage One 2015

Name: Aurora Energy Limited
Address: PO Box 1404,
DUNEDIN 9054

1. These further submissions are in support of or in opposition to submissions on the Proposed Queenstown Lakes District Plan - Stage One ("**Proposed Plan**") 2015.
2. Aurora Energy Limited ("**Aurora**") is a person who has an interest in the Plan Change that is greater than the interest of the general public.
3. As explained in Aurora's original submission, Aurora owns, operates and maintains an electricity distribution network in the Dunedin and Central Otago regions. This network carries electricity from the National Grid to more than 85,000 homes and businesses across Dunedin City and the Central Otago Region. Aurora owns substations, lines and cables located in public road reserve, as well as on private property. In addition to the distribution network, Aurora has the capacity to own and operate high voltage (up to 110kV) transmission lines, and associated structures in future, and may be required to do so as regional electricity demand grows. Aurora is committed to providing its customers in the region with an effective and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities including hospitals, schools, offices and residential dwellings.
4. Aurora has particular interests in ensuring that the Proposed Plan enables the continued and efficient operation of its regionally significant infrastructure as well as generally ensuring that other existing and new regionally significant and critical infrastructure within the District is adequately provided for.
5. In light of the above, Aurora considers that it has an interest in the Proposed Plan that is

greater than the interest of the general public, by virtue of its existing regionally significant and critical infrastructure throughout the District.

6. Aurora therefore makes the following further submissions pursuant to clause 8 of the First Schedule to the RMA. Further submissions from Aurora on the Proposed Plan are attached to this document in Table Form. (See **Annexure One**).
7. Aurora will not gain an advantage in trade competition through these further submissions.

Aurora wishes to be heard in support of its submission.

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

Signed: *Joanne Dowd*

On behalf of Aurora Energy Limited

Dated at Dunedin this 18th day of December 2015

Address for Service:

Aurora Energy Limited
C/- Delta Utility Services Limited
PO Box 1404
DUNEDIN 9054

Contact Details:

Attention: Joanne Dowd – Network Policy Manager

Telephone: 03 471 6783

E-mail: joanne.dowd@thinkdelta.co.nz

ANNEXURE ONE

Submitter	Decision Requested	Aurora's Position	Further Submission
DEFINITIONS			
Vodafone NZ (179.5) Spark Trading NZ Limited (191.4) Chorus New Zealand Limited (781.5)	Definition of Minor Upgrading - Amend the definition to read: <ul style="list-style-type: none"> • <i>Addition of a single service support structure for the purpose of providing a service connection to a site, except in the Rural Zone.</i> • <i>The addition of up to three new support structures extending the length of an existing line provided the line has not been lengthened in the preceding five year period, except in the Rural Zone.</i> • <i>An increase by no more than 30% in any dimension for utility poles, structures, or cabinets or antenna.</i> • <i>Addition of lines and ancillary equipment to existing poles.</i> 	Support	Aurora agrees that providers of Regional Significant Infrastructure require the ability to maintain, replace and upgrade assets to ensure that a safe and reliable electricity supply can be maintained. The amendments sought by the submitters are therefore supported. This submission is aligned with the relief sought by Aurora in its original submissions.
Vodafone NZ (179.8) Spark Trading NZ Limited (191.6)	Support in part. Definition of Utility - Retain and amend sixth bullet point: <i>"structures, facilities, plant, antennas, lines (including cables), equipment and associated works for receiving and transmitting telecommunications and radio communications (see definition of telecommunication facilities)"</i> OR Delete definition and use RMA definition of "infrastructure" instead.	Support	Aurora agrees that providers of Regional Significant Infrastructure require the ability to maintain, replace and upgrade assets to ensure that a safe and reliable electricity supply can be maintained. The amendments sought by the submitters are therefore supported.
Transpower New Zealand Limited (805.16)	Add a new definition: "Regionally significant infrastructure: includes the following: a) <u>Renewable electricity generation facilities, where they supply the national electricity grid and local distribution network; and</u> b) <u>The National Grid; and</u> c) <u>The Electricity distribution network; and</u> d) <u>Telecommunication and radio communication facilities; and</u> e) <u>Road classified as being of national or regional importance; and</u> f) <u>Marinas and Airports; and</u> g) <u>Structures for transport by rail."</u>	Support	Aurora agrees that a new definition of <i>Regionally Significant Infrastructure</i> should be inserted into the Proposed Plan to provide certainty around the nature and type of infrastructure that is significant on a regional scale. This submission is aligned with the relief sought by Aurora in its original submissions.
STRATEGIC DIRECTION			
Spark Trading NZ Limited (191.7)	Define the relationship of the goals, objectives and policies with the other chapters of the plan. Delete Goals from the chapter and retain as titles. Insert new policies: <u>In recognition of the benefits of utilities and the significant investment in utilities, enable utilities and infrastructure to be developed, maintained, upgraded and operated provided that, as a result of its location, and design:</u> a) <u>the adverse effects on significant natural and physical resources and cultural values are avoided, or where this is not practicable, remedied or mitigated; and</u> b) <u>other adverse effects on the environment are appropriately controlled.</u> c) <u>avoid land-uses that may result in adverse reverse sensitivity effects on telecommunication infrastructure facilities or where</u>	Support	Aurora submits that, given the over-arching strategic direction of this chapter of the Proposed Plan, recognition should be given to the benefits of Regionally Significant Infrastructure and the contribution it makes to the economy of the District. There is currently no acknowledgement of the significance of infrastructure in this section of the Plan. This submission is aligned with the relief sought by Aurora in its original submissions.

Submitter	Decision Requested	Aurora's Position	Further Submission
	<p><u>this is not practicable, remedied, mitigated.</u></p> <p>d) <u>Enable infrastructure to be effective and efficient, especially in regard to its configuration, recognising that it may be located in or traverse sensitive areas where there is a functional or operational need for that location.</u></p>		
PowerNet (251.1)	<p>57-3Strategic Direction > 59-3.2Goals, Objectives and Policies > 60-3.2.1Goal 1 - 73-3.2.1.5 Objective 5</p> <p>PowerNet seeks that the objective is amended as follows:</p> <p><i>Maintain and promote the efficient operation and development of the District's infrastructure, including designated Airports, key roading, electricity and communication technology networks.</i></p> <p>PowerNet considers that additional policies are required to assist Objective 3.2.1.5 being achieved and effectively implemented.</p> <p>Insert new policies to complement Objective 3.2.1.5 as follows:</p> <p><i>Policy 3.2.1.5.1 Recognise that infrastructure makes an essential contribution to the prosperity and economic resilience of the District.</i></p> <p><i>Policy 3.2.1.5.2 Ensure that the efficient and effective operation of infrastructure is safeguarded and not compromised, now or in the future, by incompatible development.</i></p>	Support	<p>Aurora submits that, given the over-arching strategic direction of this chapter of the Proposed Plan, recognition should be given to the benefits of Regionally Significant Infrastructure and the contribution it makes to the economy of the District. There is currently no acknowledgement of the significance of infrastructure in this section of the Plan.</p> <p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>
PowerNet (251.3)	<p>PowerNet submits that the following new goal and associated objective and policies be inserted into the PDP:</p> <p><i>3.2.8 Goal –Providing for the ongoing operation and growth of regionally significant infrastructure.</i></p> <p><i>Objective 3.2.8.1 Recognise that the functional or operational requirements of regionally or nationally significant infrastructure can necessitate a particular location.</i></p> <p><i>Policy 3.2.8.1.1 Enable the continued operation, maintenance and upgrading of regionally and nationally significant infrastructure and associated activities.</i></p> <p><i>Policy 3.2.8.1.2 Where practicable, mitigate the impacts of regionally and nationally significant infrastructure on outstanding natural landscapes and outstanding natural features.</i></p>	Support	<p>Aurora submits that, given the over-arching strategic direction of this chapter of the Proposed Plan, recognition should be given to the benefits of Regionally Significant Infrastructure and the contribution it makes to the economy of the District. There is currently no acknowledgement of the significance of infrastructure in this section of the Plan.</p> <p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>
Board of Airline Representatives of New Zealand (BARNZ) (271.4)	<p>57-3Strategic Direction > 59- 3.2Goals, Objectives and Policies > 74-3.2.2 Goal 2 > 75- 3.2.2.1Objective 1</p> <p>Add an additional bullet to 3.2.2.1:</p> <p><u>_ in locations which avoid reverse sensitivity effects on significant infrastructure.</u></p>	Support	<p>Aurora submits that it is appropriate to recognise subdivision, development and land use can increase the potential for reverse sensitivity effects on infrastructure and this should be recognised within the Proposed Plan.</p> <p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>
Board of Airline Representatives of	57-3 Strategic Direction > 59- 3.2Goals, Objectives and Policies > 74-	Support	Aurora submits that it is appropriate to recognise subdivision, development and

Submitter	Decision Requested	Aurora's Position	Further Submission
New Zealand (BARNZ) (271.5)	3.2.2 Goal 2 > 75- 3.2.2.1 Objective 1 > 78-3.2.2.1.3 Add an additional bullet to 3.2.2.1.3: _ that development occurs in locations and forms which avoid reverse sensitivity effects on significant infrastructure.		land use can increase the potential for reverse sensitivity effects on infrastructure and this should be recognised within the Proposed Plan. This submission is aligned with the relief sought by Aurora in its original submissions.
LANDSCAPE			
PowerNet (251.9)	771-21 Rural Zone > 1011- 21.7 Assessment Matters (Landscapes) > 1027-21.7.3 Other factors Amend assessment matter 21.7.3.2 to enable recognition for utilities seeking to establish in any landscape area that have a functional and/or technical reason for that location.	Support	Aurora submits that the Rural Zone Assessment Matters do not recognise and provide for the location and technical constraints associated with regionally significant infrastructure provision. The amendment sought by the submitter will address this shortfall and as such is supported.
URBAN ZONE			
Board of Airline Representatives of New Zealand (BARNZ) (271.5)	11-4 Urban Development > 13- 4.2 Objectives and Policies > 14- 4.2.1 Objective 1 > 16-4.2.1.2 Add the words ' <u>which avoids reverse sensitivity effects on significant infrastructure</u> ' to the end of policy 4.2.1.2.	Support	Aurora submits that it is appropriate to recognise subdivision, development and land use can increase the potential for reverse sensitivity effects on infrastructure and this should be recognised within the Proposed Plan. This submission is aligned with the relief sought by Aurora in its original submissions.
Board of Airline Representatives of New Zealand (BARNZ) (271.7)	11-4 Urban Development > 13- 4.2 Objectives and Policies > 28- 4.2.3 Objective 3 > 29-4.2.3.1 Add an additional bullet to 4.2.3.1: <u>_ that development occurs in locations and forms which avoid reverse sensitivity effects on significant infrastructure.</u>	Support	Aurora submits that it is appropriate to recognise subdivision, development and land use can increase the potential for reverse sensitivity effects on infrastructure and this should be recognised within the Proposed Plan. This submission is aligned with the relief sought by Aurora in its original submissions.
New Zealand Transport Agency (719.7)	11-4 Urban Development > 13- 4.2 Objectives and Policies > 14- 4.2.1 Objective 1 > 20-4.2.1.6 Amend Policy 4.2.1.6 as follows: "Avoid sporadic urban development that would adversely affect the natural environment, <u>the efficiency and functionality of infrastructure</u> , rural amenity or landscape values; or compromise the viability of a nearby township."	Support	Aurora submits that the Urban Development Chapter does not recognise and provide for the location and technical constraints associated with regionally significant infrastructure provision. The amendment sought by the submitter will address this shortfall and as such is supported. This submission is aligned with the relief sought by Aurora in its original submissions.
Transpower New Zealand Limited (805.34)	11-4 Urban Development > 13- 4.2 Objectives and Policies > 14- 4.2.1 Objective 1 > 16-4.2.1.2 Support with amendments. Amend to: Urban development and <u>growth is integrated with existing public</u>	Support	Aurora submits that the Urban Development Chapter does not recognise and provide for the location and technical constraints associated with regionally significant infrastructure provision. The amendment sought by the submitter will address this shortfall and as such is supported.

Submitter	Decision Requested	Aurora's Position	Further Submission
	<p><u>regionally significant infrastructure, and achieves a pattern, form and design that does not adversely affect existing regionally significant infrastructure and does not restrict the upgrade and development of that infrastructure is designed and located in a manner consistent with the capacity of existing networks.</u></p>		<p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>
SUBDIVISION AND DEVELOPMENT			
<p>Vodafone NZ (179.12)</p> <p>Spark Trading NZ Limited (191.10)</p> <p>Two Degrees Mobile Limited (421.10)</p>	<p>Insert (New rule) Rule 27.4.1A <u>In all zones subdivision for utilities is a controlled activity.</u></p>	<p>Support</p>	<p>Aurora supports the inclusion of this Rule as it will enable the efficient and effective provision of lots of an appropriate size for utilities.</p>
<p>Transpower New Zealand Limited (805.63)</p>	<p>1182-27 Subdivision and Development > 1184-27.2 Objectives and Policies – District Wide</p> <p>Add a new Objective: <u>To avoid subdivision and the establishment of land use activities that could adversely affect (including through reverse sensitivity) the operation, maintenance, upgrading and development of regionally significant infrastructure, such as the National Grid.</u></p>	<p>Support</p>	<p>Aurora supports the introduction of this Objective but considers it should be extended to include the <i>Critical Electricity Lines</i> owned by Aurora as follows:</p> <p>To avoid subdivision and the establishment of land use activities that could adversely affect (including through reverse sensitivity) the operation, maintenance, upgrading and development of regionally significant infrastructure, such as the National Grid <u>and Critical Electricity Lines.</u></p> <p>This is aligned with the relief sought by Aurora in its original submissions.</p>
<p>Transpower New Zealand Limited (805.65)</p>	<p>1182-27 Subdivision and Development > 1242-27.3 Other Provisions and Rules > 1243- 27.3.1 District Wide</p> <p>Support with amendments. Add the following clause: Attention is drawn to the following District Wide chapters, particularly <u>Chapter 30: Energy and Utilities for any use, development or subdivision located near the National Grid.</u> All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</p>	<p>Support</p>	<p>Aurora supports the amendments proposed by the submitter but considers it should be extended to include the <i>Critical Electricity Lines</i> owned by Aurora as follows:</p> <p>Attention is drawn to the following District Wide chapters, particularly Chapter 30: Energy and Utilities for any use, development or subdivision located near the National Grid <u>and Critical Electricity Lines.</u> All provisions referred to are within Stage 1 of the Proposed District Plan, unless marked as Operative District Plan (ODP).</p> <p>This is aligned with the relief sought by Aurora in its original submissions.</p>
ENERGY AND UTILITIES			
Objective 5			
<p>Vodafone NZ (179.16)</p> <p>Spark Trading NZ Limited (191.14)</p>	<p>Amend 30.2.5 Objective Co-ordinate the The growth and development of the District is supported <u>by the efficient and effective</u> provision of utilities as necessary to: Insert new policy: <u>Recognise the positive social, economic, cultural and environmental</u></p>	<p>Support</p>	<p>Aurora supports the introduction of the new policy as proposed by the submitter, as it is appropriate that the Proposed Plan provides enabling provisions which recognise the essential nature of utilities.</p>

Submitter	Decision Requested	Aurora's Position	Further Submission
	<p><i>benefits that utilities provide, including:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>enabling enhancement of the quality of life and standard of living for people and communities.</i> <input type="checkbox"/> <i>providing for public health and safety.</i> <input type="checkbox"/> <i>enabling the functioning of businesses.</i> <input type="checkbox"/> <i>enabling economic growth.</i> <input type="checkbox"/> <i>enabling growth and development.</i> <input type="checkbox"/> <i>protecting the transportation of freight, goods, people.</i> <input type="checkbox"/> <i>enabling interaction and communication.</i> 		
Objective 6			
<p>Vodafone NZ (179.20)</p> <p>Spark Trading NZ Limited (191.18)</p>	<p>26-30 Energy and Utilities > 30- 30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 60- 30.2.6.1</p> <p>Delete and replace with: <i>Enable the continued use, operation, maintenance and upgrading of utilities provided that, to the extent practicable, it appropriately protects the outstanding natural landscapes, outstanding natural features or identified special character areas. Where new or major upgrades to utilities are proposed, adverse effects on the outstanding natural landscapes, outstanding natural features or identifies special character areas must be minimised.</i></p>	Support	<p>Aurora supports the amendment to Objective 6, as proposed by the submitters, as it is appropriate to recognise that infrastructure can have specific locational requirements to be located in areas subject to environmental constraints. The development of such infrastructure is the subject of considerable financial investment and in many cases is unlikely to be readily replaced or duplicated. It is therefore appropriate to provide for the continued use, operation, maintenance and upgrading of such infrastructure.</p>
<p>Federated Farmers of New Zealand (600.109)</p>	<p>26-30 Energy and Utilities > 30- 30.2 Objectives and Policies > 59-30.2.6 Objective 6 > 61- 30.2.6.2</p> <p>Policy 30.2.6.2 is amended as follows (or words to similar effect) Consider long term options, and economic costs and strategic needs, <u>and economic costs including those imposed on adversely impacted activities</u> when considering alternative locations, sites or methods for the establishment or alteration of a utility.</p>	Oppose	<p>Aurora opposes the amendment to Objective 6, as proposed by the submitter. Network utility infrastructure has specific technical and locational requirements and is the subject of considerable financial investment which in many cases is unlikely to be readily replaced or duplicated. Provision for rural related activities associated with farming is provided for under Chapter 21 Rural and as such need not be repeated in this chapter of the Proposed Plan.</p>
Objective 7			
<p>Vodafone NZ (179.24)</p> <p>Spark Trading NZ Limited (191.22)</p>	<p>26-30 Energy and Utilities > 30- 30.2 Objectives and Policies > 65-30.2.7 Objective 7 > 66- 30.2.7.1</p> <p>Retain and insert additional Policy: <i>Recognise that in some cases it might not be possible for utilities to avoid outstanding natural landscapes, outstanding natural features or identified special character areas and in those situations greater flexibility as to the way that adverse effects are managed may be appropriate.</i></p>	Support	<p>Aurora supports this submission as it is aligned with the relief sought by Aurora in its original submissions.</p>
30.4 Rules			
<p>Aaron Cowie (20.1)</p>	<p>Requests that any objects above 1.2m in height require the following process:</p> <ul style="list-style-type: none"> - all neighbours notified prior to erection/agreement of the object - all neighbours have the right to lodge any objections (giving reasons) - the applicant can amend their submissions in response to neighbours objections - all objections are taken into account before a decision is made. 	Oppose	<p>Aurora opposes the submission on the basis that the majority of Aurora's assets extend beyond 1.2m in height and are located throughout the District. The process outlined by the submitter would result in costly inefficiencies for regionally significant infrastructure providers such as Aurora, and have implications for maintaining a secure electricity supply. As such, Aurora opposes the inclusion of such restrictions being placed on regionally significant infrastructure.</p>

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PowerNet (251.21)	26-30 Energy and Utilities > 83-30.4 Rules - Activities > 91-30.4.8 PowerNet seeks the following amendment to this rule: <i>Utilities, Building, Structures, <u>Underground Lines</u> and Earthworks which are not otherwise listed in this table – D P (Permitted Activities)</i>	Support	Aurora supports the submission on the basis that underground lines and buildings less than 10m ² should be provided for as permitted activities. Such assets are key to Aurora's asset development and requiring resource consent for the installation of such assets will result in costly inefficiencies and have implications for maintaining a secure electricity supply for the District.
PowerNet (251.26)	26-30 Energy and Utilities > 83-30.4 Rules - Activities > 114-30.4.16 Oppose in part. PowerNet seeks the following amendment to this rule: <i>Rule 30.4.16 Buildings (associated with a Utility)</i> <i>Any addition, alteration or construction of buildings and structures, (other than masts for any telecommunication and radio communication facility, navigation or meteorological communication facility or supporting structures for lines) in:</i> <ul style="list-style-type: none"> • Any Significant Natural Areas • The Arrowtown Residential Historic Management Zone. • The Remarkables Park Zone <i>However, this rule shall not apply where the provisions of the underlying zone or a District Wide matter specify a more restrictive activity status.</i> <i>Discretionary Activity</i>	Support	Aurora supports this submission on the basis that this clause is contradictory to the purpose of the enabling <i>Energy and Utilities</i> chapter. In addition, given the Proposed Plan is being notified in two parts, Aurora agrees that it is unclear how this clause will affect the provision of utility buildings and structures. As such Aurora supports the submission that this clause be deleted.
PowerNet (251.29)	26-30 Energy and Utilities > 120-30.5 Rules – Standards > 148-30.5.6 Amend the activity status where an activity does not achieve this standard from Discretionary to Restricted Discretionary, with discretion limited to effects associated with the boundary setback, and the positive effects of the utility.	Support	Aurora agrees that where a utility structure cannot achieve the relevant setback distance for boundaries, the appropriate activity status should be Restricted Discretionary, with discretion limited to those effects resulting from the boundary setback breach.
Two Degrees Mobile Limited (421.21) Chorus New Zealand Limited (781.27)	26-30 Energy and Utilities > 120- 30.5 Rules – Standards > 149-30.5.7 Requests deletion of this standard.	Support in part	Aurora supports the submission in part, on the basis that it is appropriate that the proposed Plan provide a more enabling framework for network utilities given the regional significance of such infrastructure.
Two Degrees Mobile Limited (421.22)	26-30 Energy and Utilities > 120- 30.5 Rules – Standards > 150-30.5.8 Requests deletion of this standard.	Support in part	Aurora supports the submission in part, on the basis that it is appropriate that the proposed Plan provide a more enabling framework for network utilities given the regional significance of such infrastructure.
Two Degrees Mobile Limited (421.23)	26-30 Energy and Utilities > 120- 30.5 Rules – Standards > 151-30.5.9 Requests deletion of this standard.	Support in part	Aurora supports the submission in part, on the basis that it is appropriate that the proposed Plan provide a more enabling framework for network utilities given the regional significance of such infrastructure.
Transpower New Zealand Limited (805.86)	26-30 Energy and Utilities > 70- 30.3 Other Provisions and Rules > 72-30.3.2 National <u>Electricity (Hazards from Trees) Regulations 2003</u> <u>Vegetation to be planted within the National Grid corridor should be selected and/or managed to ensure that it will not result in that</u>	Support	Aurora supports the amendments proposed by the submitter but considers it should be extended to include the <i>Critical Electricity Lines</i> owned by Aurora as follows: Electricity (Hazards from Trees) Regulations 2003 Vegetation to be planted within the National Grid or <u>Critical Electricity Line</u>

Submitter	Decision Requested	Aurora's Position	Further Submission
Transpower New Zealand Limited (805.90)	<p>vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.</p> <p>26-30 Energy and Utilities > 83- 30.4 Rules - Activities > 93-30.4.10</p> <p>Support with amendments. Replace Rule 30.4.10 with the following permitted activity Rule and associated standards: <u>Rule 30.4.10</u> <u>Buildings, Structures and Sensitive Activities in National Grid Yards:</u></p> <p>a) <u>Under the National Grid Conductors (wires), on all sites within any part of the National Grid Yard any buildings and structures must:</u></p> <p>i. <u>If they are for a sensitive activity, not involve an increase in the building height or footprint where alterations and additions to existing buildings occur; or</u></p> <p>ii. <u>Be a fence less than 2.5m high; or</u></p> <p>iii. <u>Be network utilities within a transport corridor or any part of electricity infrastructure that connects to the National Grid; or</u></p> <p>iv. <u>Be an uninhabitable farm building or structure for farming activities (excluding milking/dairy sheds (but not associated ancillary structures and yards), protective canopies, or factory farming buildings); or</u></p> <p>v. <u>Be artificial crop protection structures and crop support structures excluding a commercial greenhouse and protective canopies.</u></p> <p>b) <u>All buildings or structures permitted by a) must comply with at least one of the following conditions:</u></p> <p>i. <u>A minimum vertical clearance of 10m below the lowest point of the conductor associated with National Grid lines; or</u></p> <p>ii. <u>Demonstrate that safe electrical clearance distances required by NZECP34:2001 are maintained under all National Grid line operating conditions.</u></p> <p>c) <u>Buildings and structures shall be at least 12m from a National Grid support structure unless it is a:</u></p> <p>i. <u>Network Utility within a transport corridor or any part of electricity infrastructure that connects to the National Grid.</u></p> <p>ii. <u>Fence less than 2.5m in height and more than 5m from the nearest support structure.</u></p> <p>iii. <u>Artificial crop protection structure or crop support structure between 8 metres and 12 metres from a pole support structure that:</u></p> <p>a) <u>Meet the requirements of NZECP34:2001;</u></p> <p>b) <u>are no more than 2.5m in height;</u></p> <p>c) <u>are removable or temporary to allow a clear working space 12 metres from the pole where necessary for maintenance and emergency repair purposes, and</u></p>	Support	<p>corridor should be selected and/or managed to ensure that it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003.</p> <p>Aurora submits that it is appropriate that provision is made for network utility activities, operating with the National Grid yard, to be provided for as permitted activities under the Proposed Plan.</p>

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	<p>d) <u>allow all weather access to the pole and a sufficient area for maintenance equipment, including a crane; and</u></p> <p>iv. <u>(iv) Artificial crop protection structure or crop support structure located within 12 metres of a tower support structure if they meet the requirements of clause 2.4.1 of NZECP34:2001.</u></p> <p>v. <u>Buildings (that are not for National Grid Sensitive Activities); Structures and Earthworks within National Grid Corridors (subject to compliance with Rules 30.5.10 and 30.5.11)</u></p>		
<p>Transpower New Zealand Limited (805.92)</p>	<p>26-30 Energy and Utilities > 83- 30.4 Rules - Activities > 94- 30.4.11</p> <p>Replace Rules 30.4.11 and 30.4.12 with the following Rules: <u>Rule 30.4.11</u> <u>The construction and maintenance of the following network utilities are a permitted activity provided they meet the following standards:</u></p> <ul style="list-style-type: none"> a) <u>Any new electricity lines and associated transformers shall be limited to a voltage up to and including 110kV.</u> b) <u>Maintenance of any existing line.</u> c) <u>Any trimming or removal of any vegetation that is required to maintain safe separation distances or the ongoing efficient operation of the line.</u> d) <u>In the case of poles and towers, these shall comply with a maximum height of:</u> <ul style="list-style-type: none"> i. <u>20 metres in Rural or Industrial Zones.</u> ii. <u>12 metres in any Residential Zone.</u> <p><u>Rule 30.4.12</u> <u>Any activity that does not comply with the standards specified in Rule 30.4.11 is a controlled activity.</u></p> <p><u>A conductor line, or support structure for overhead lines, to convey electricity (at a voltage of equal to or less than 110kV at a capacity of equal to or less than 100MVA); or overhead lines for any other purpose including telecommunications.</u></p>	<p>Support</p>	<p>Aurora supports the submission on the basis that the construction and maintenance of the identified network utilities should be provided for as permitted activities.</p> <p>Aurora submits that it is appropriate that the Proposed Plan provides a more enabling framework for network utilities given the regional significance of such infrastructure.</p>
<p>Transpower New Zealand Limited (805.93)</p>	<p>26-30 Energy and Utilities > 120- 30.5 Rules – Standards > 158- 30.5.11</p> <p>Replace Rule 30.5.11 with the following rules <u>Rule 30.5.11</u> <u>Earthworks within the National Grid Yard are permitted activities, subject to compliance with the following standards:</u></p> <ul style="list-style-type: none"> a) <u>Shall be no deeper than 300mm within 12m of any National Grid support structure foundation</u> b) <u>Shall not compromise the stability of a National Grid support structure; and</u> c) <u>Shall not result in a reduction in the ground to conductor clearance distances below what is required by Table 4 of NZECP34.</u> 	<p>Support</p>	<p>Aurora submits that it is appropriate that provision is made for network utility activities (including earthworks), operating with the National Grid yard, to be provided for as permitted activities under the Proposed Plan.</p>

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	<p>d) <u>Provided that, the following are exempt from point (a) above:</u></p> <ul style="list-style-type: none"> • <u>Earthworks for a Network Utility within a transport corridor, as part of a transmission activity, or for electricity infrastructure; or</u> • <u>Earthworks undertaken as part of agricultural or domestic cultivation, or repair, sealing or resealing of a road, footpath, driveway or farm track.</u> • <u>Vertical holes not exceeding 500mm in diameter are exempt provided they are:</u> <ol style="list-style-type: none"> i. <u>more than 1.5m from the outer edge of pole support structure or stay wire; or</u> ii. <u>a post hole for a farm fence or horticulture structure and more than 5m from the visible outer edge of a tower support structure foundation.</u> 		
PROTECTED TREES			
Vodafone NZ (179.33)	Amend Table 2, Rule 32.4.9 as follows: <i>Tree trimming carried out be the Council, <u>network utility operators</u> or its their agents. (Note consequential amendments to titles and other rules required).</i>	Support	Aurora is supportive of measures that seek to protect the removal or significant trimming of protected trees. However, there will be instances where Aurora will be required to undertake significant trimming and/or removal of protected trees to ensure that the operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.
Two Degrees Mobile Limited (421.25)	<p>682-32 Protected Trees > 711-32.4 Rules – Protected Trees > 720-32.4.9</p> <p>Amendment to enable network operators to undertake any necessary maintenance works to any tree as required to protect the integrity of utilities and their services, and to provide new services without the need for resource consent.</p>	Support	Aurora is supportive of measures that seek to protect the removal or significant trimming of protected trees. However, there will be instances where Aurora will be required to undertake significant trimming and/or removal of protected trees to ensure that the operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.
Queenstown Lakes District Council (809.7)	<p>682-32 Protected Trees > 711- 32.4 Rules – Protected Trees > 712-32.4.1</p> <p>Change to – Minor trimming of a protected tree and minor trimming of a protected hedgerow no more than once in a single calendar year.</p>	Support in part	Aurora is supportive of measures that seek to protect the removal or significant trimming of protected trees. However, there will be instances where Aurora will be required to undertake significant trimming and/or removal of protected trees to ensure that the operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.
Queenstown Lakes District Council (809.8)	<p>682-32 Protected Trees > 711- 32.4 Rules – Protected Trees > 715-32.4.4</p> <p>32.4.4 Change to – Maintenance of protected hedgerows comprising the trimming of not greater than 50% of the canopy provided such work is supervised by a suitably qualified professional arborist experienced in the management of amenity trees and approved by Queenstown Lakes District Council prior to commencement of the works.</p>	Support in part	Aurora is supportive of measures that seek to protect the removal or significant trimming of protected trees. However, there will be instances where Aurora will be required to undertake significant trimming and/or removal of protected trees to ensure that the operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.
Queenstown Lakes District Council (809.9)	682-32 Protected Trees > 711- 32.4 Rules – Protected Trees > 716-32.4.5	Support in part	Aurora is supportive of measures that seek to protect the removal or significant trimming of protected trees. However, there will be instances where Aurora will be required to undertake significant trimming and/or removal of protected trees

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	32.4.5 Change to – The removal or significant trimming of a protected tree where the tree is dead, diseased or damaged and presents a potential hazard to persons or property. Prior to the removal or significant trimming, persons must provide to Council a report from a suitably qualified professional arborist experienced in the management of amenity trees detailing the reasons and justification for removal or significant trimming. Works must not commence prior to the Council confirming the permitted activity status of the removal or significant trimming of a protected tree. Should it be identified that a tree presents an imminent hazard, any work that is considered necessary to immediately abate the hazard may proceed at once, though evidence shall be submitted to council identifying the urgency for the works.		to ensure that the operational efficiency of its network is maintained and to remove potential fire risks. These represent exceptional circumstances and it is appropriate that they are provided for under the Proposed Plan.
INDIGENOUS VEGETATION			
Evan Alty (339.90)	26-33 Indigenous Vegetation and Biodiversity > 28-33.2 Objectives and Policies > 39-33.2.2 Objective 2 > 41-33.2.2.2 Delete and replace as follows: Allow the clearance of indigenous vegetation within Significant Natural Areas only in exceptional circumstances and in circumstances where these activities will have a low impact or offer compensation commensurate to the nature and scale of the clearance. <u>Allow the clearance of indigenous vegetation within Significant Natural Areas only in exceptional circumstances and in circumstances where significant adverse effects are avoided. Where adverse effects are not significant:</u> <u>they are avoided in the first instance;</u> <u>where they cannot be avoided, they are remedied;</u> <u>where they cannot be remedied they are mitigated; and</u> <u>Where residual adverse effects remain, and cannot be mitigated they are offset.</u>	Oppose in part	Aurora is supportive of measures that seek to reduce the loss of biodiversity values, particularly in locations identified as Significant Natural areas. However, there will be instances where Aurora will be required to remove indigenous vegetation to ensure that operational efficiency of its network is maintained and to remove potential fire risks. This should be reflected in the Proposed Plan.
Evan Alty (339.111)	26-33 Indigenous Vegetation and Biodiversity > 76-33.4 Rules – Clearance of Indigenous Vegetation > 78-33.4.2 Make the removal of SNA a non-complying activity.	Oppose in part	Aurora is supportive of measures that seek to reduce the loss of biodiversity values, particularly in locations identified as Significant Natural areas. However, there will be instances where Aurora will be required to remove indigenous vegetation to ensure that operational efficiency of its network is maintained and to remove potential fire risks. This should be reflected in the Proposed Plan.
DESIGNATIONS			
For the Hall Family Trusts – James Hall – (51.1) Queenstown Lakes District Council (383.88) Queenstown Lakes District Council (383.115)	Amend designation 574 (Aurora Substation) on Planning Map 29 to only the area where the substation is located.	Support	Aurora agrees that the designation boundary depicted within the Proposed Plan should be amended to reflect the actual substation boundary.

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RCL Queenstown Pty Ltd, RCL Henley Downs Ltd, RCL Jacks (632.90)	26-37 Designations Amend Designation 567 to reduce the area of the designation to the extent of the Aurora substation easement being that part marked "G" on the title for Lot 12 DP 364700	Support	Aurora agrees that the designation boundary depicted within the proposed Plan should be reflective of the substation easement boundary being that part marked "G" on the title for Lot 12 DP 364700.
Queenstown Gold Limited (724.4)	26-37 Designations > 36- C. Conditions for Specific Designations > 80- C.75 Designation #488 Aurora – Electricity Substation and Ancillary Purposes Require as a condition for designation 570 the following: The proposed designation is confirmed in accordance with the plan titled Aurora 33kV Substation – Queenstown: Site Survey and Mapping stamped as approved on 8 May 2012.	Oppose	Aurora objects to the submission that Condition 1 of resource consent RM120701 is maintained as part of Designation 570. The Queenstown Substation was constructed in accordance with the plan titled Aurora 33kV Substation – Queenstown: Site Survey and Mapping - stamped as approved on 8 May 2012 ("Consent Plan"). Now that the substation is operational, the condition is considered to be superfluous. The submitter states that the condition provides " <i>confidence as to the bulk and location of development proposed and the level of effect it could reasonable anticipate</i> ". This is correct in so far as it relates to the initial establishment of the substation and future development which may occur in accordance with the designation purpose and conditions. However, the Consent Plan does not dictate or prevent further development of the site. Any further development of the substation site would be undertaken in accordance with the Outline Plan provisions provided under s176A of the Resource Management Act 1991, and guided by the designation conditions relating to height (Condition 1) and appearance (Condition 2). As such Aurora maintains its position that Condition 1 of resource consent RM120701 is deleted from its designation.