

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested	Support or Oppose Original Submission Point	The Reasons for my support/opposition are:
Buller Conservation Group (S552)	S552.043	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Oppose	Concerned that the plan is making it too permissive for such telecom infrastructure	Change to discretionary activity	Oppose	Too broad
Buller Conservation Group (S552)	S552.044	Energy Infrastructure and Transport	Energy Infrastructure and Transport	Amend	Above the treeline scarring is very obvious and the treeline is not necessarily at 1000m.	R10: a Visual impacts on landscapes above the treeline over 4000m above sea level;	Oppose	We support the provision as currently worded.
Buller District Council (S538)	S538.023	Energy	Energy Rules	Not Stated	There is no provision for operation, maintenance and repairs of existing below ground energy activities or provision for installation of new facilities, therefore Council seeks a new rule to address these. No performance standards are considered necessary.	Insert a new rule as follows: Operation, Maintenance, Repairs and Installation of Below Ground Energy Activities Activity Status Permitted	Support	For the reasons given by the original submitter
Buller District Council (S538)	S538.022	Energy	ENG - R4	Support in part	Rule 4 is generally supported but the rule heading is long and could be simplified for ease of reference. It is suggested that rather than listing the various energy associated activities in the heading, reference is made to 'energy activities' generally as this is defined in the Plan. Council also seeks that 'above ground' is added to the heading to clarify that the rule is restricted in scope to these activities and that a new rule is included to enable operation and maintenance of 'below ground' energy activities, as per below.	Amend Rule 4 as follows: Operating existing transmission and distribution lines, new distribution and transmission lines, maintaining, minor upgrading, strengthening, upgrading and replacing support structures and foundations not managed by the National Environmental Standard for Electricity Transmission Activities. Operation, Maintenance, Repairs and Removal of Existing Above Ground Energy Activities.	Support	For the reasons given by the original submitter
Buller District Council (S538)	S538.026	Energy	ENG - R6	Oppose in part	While clause 3 lists activities which are able to occur under the transmission lines, there is no provision for earthworks associated with agricultural activities. This is considered an important omission given the District's electricity transmission network extends over large areas of rural land where agricultural activities such as cultivation are being undertaken beneath the network. Provided earthworks are undertaken so that there will be no reduction of ground clearance distances, Council considers that agricultural activities will not pose a threat to the integrity of the network and provision should be made for this within the rule.	Amend Rule 6 and include an additional clause as follows: 3. The following other activities are able to occur under the conductors where these are Permitted within the relevant zone and overlay (v) Agricultural and horticultural activities provided that any earthworks do not result in a reduction of existing ground clearance distances from overhead lines.	Support	For the reasons given by the original submitter
Buller District Council (S538)	S538.029	Energy	ENG - R10	Oppose	Environmental monitoring and meteorological facilities are expected to be small scale structures and Council does not see the necessity for imposing performance standards. In any case, there is provision for environmental and meteorological facilities within the Infrastructure Chapter therefore this rule is not considered necessary.	Delete Rule 10.	Support	For the reasons given by the original submitter
Buller District Council (S538)	S538.031	Energy	ENG - R12	Support in part	As a consequence of the amendments sought above, a change to the heading of Rule 12 is sought.	Operating existing transmission and distribution lines, new distribution and transmission lines, maintaining, minor upgrading, strengthening, upgrading and replacing support structures and foundations not meeting Permitted Activity Standards Operation, Maintenance, Repairs or Removal of Existing Above Ground Energy Activities not meeting Permitted Activity Standards Provision also needs to be made for installation of above ground transmission lines that do not comply with the permitted performance standards to be treated as discretionary activities.	Support	For the reasons given by the original submitter

Buller Electricity Limited (S451)	S451.023	Energy	Energy Objectives	Amend	This separates the requirement to give effect to the RPS from the second part of Objective 3	Add a new objective as follows: <i>Energy activities, including their operation, maintenance, upgrading or development, are protected from the adverse effects of incompatible subdivision and development.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.020	Energy	ENG - O1	Amend	The proposed Objective ENG - O1 is supported in part however BEL seek a minor amendment to the objective, as set out below, to ensure it reads correctly.	<i>Amend to read: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities; and provide for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.021	Energy	ENG - O2	Support in part		the objective should be reworded as follows: <i>Have particular regard to the constraints imposed by the technical, locational and operational requirements when seeking to avoid, remedy or mitigate adverse effects on communities and the environment from an energy activities design and location.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.022	Energy	ENG - O3	Support in part	The objective should be amended to give effect to the RPS	Amend objective to read <i>To provide for the enable the development, operation, maintenance and upgrade of energy activities - and to protect them from the adverse effects of incompatible subdivision and development.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.024	Energy	ENG - O4	Amend		Amend objective to read as follows: <i>To recognise and provide for the national, regional and local significance and benefits of the National Grid, by ensuring the safety, efficiency, operation, maintenance, repair, upgrade and development is not adversely affected by incompatible subdivision, use and development.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.034	Energy	Energy Policies	Amend	A new Policy ENG - 10 to provide a clear "line of sight" between any of the policies as notified (ENG - P1 to ENG P9) and Energy Rule 1 (ENG - R1).	Include a new policy as follows: <i>Avoid radio, electric and magnetic fields that do not meet the applicable New Zealand or International standards or guidelines, or National Environmental Standards.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.025	Energy	ENG - P1	Support in part	Buller Electricity seeks minor amendments to enable minor upgrading of important infrastructure in order to give effect to Policy 5 of the NPSET that requires ..."decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets."	Amend to read: <i>Provide for and enable the development, operation, maintenance and upgrading of existing and new electricity transmission, distribution and renewable generation infrastructure and assets.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.026	Energy	ENG - P2	Support in part	The proposed Policy ENG - P2 is supported on the basis that it is generally consistent with Policy 1 of the NPSET. Buller Electricity however seeks minor amendments in order to be entirely consistent with this policy:	Amend to read: <i>When considering proposals to develop and operate new and existing energy activities, infrastructure and assets provide for have particular regard to the benefits to be obtained from the proposal, including;a. Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of electricity generation; or b. Maintaining or increasing renewable electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; or c. Economic, social, environmental or cultural wellbeing; or d. The contribution the proposal will have towards New Zealand meeting its renewable electricity generation targets; ore. Effective transmission and distribution of electricity supply; orf. Facilitation and use of renewable energy; org. Security of electricity supply; and orh. Meeting New Zealand/Aotearoa me Te Waipounamu's climate change obligations.</i>	Support	For the reasons given by the original submitter

Buller Electricity Limited (S451)	S451.027	Energy	ENG - P3	Oppose	Buller Electricity opposes this policy and requests that it is reworded in order to give effect to Policy 10 in the NESET	Amend policy to read: <i>Avoid reverse sensitivity effects from subdivision, use and development on electricity distribution and transmission assets, existing renewable electricity generation activities and associated infrastructure, and protect such infrastructure from adverse effects of activities on the operation, maintenance, upgrading or development of that infrastructure.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.028	Energy	ENG - P4	Amend	The proposed Policy ENG - P4 is generally supported however a minor amendment is sought as the use of "minimise" in the opening clause is concerning because: - the subsequent clauses seek a number of outcomes that are management approaches; - the term may imply that adverse effects must be made 'minimal' and this outcome may not always be possible; - the NESET does not "manage" in the objectives and "avoided, remedied or mitigated" in Policies 3 and 4. require effects to be minimised in all circumstances, but refer to the effects being	Replace the word "minimise" with "manage" in the policy.	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.029	Energy	ENG - P5	Support in part	The proposed Policy ENG - P5 is generally supported however the following minor amendment is sought in order to give effect to the RPS	<i>When considering proposals to develop, operate, maintain and upgrade new and existing energy activities, infrastructure and assets:</i> Recognise Have particular regard to the constraints imposed by their functional constraints and operational requirements; and <i>b. Where new transmission infrastructure and major upgrades to transmission infrastructure are proposed have regard to the extent to which any adverse effects have been minimised managed in the route, site and method selection.</i>	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.035	Energy	Permitted Activities	Amend	It is unclear whether underground electricity transmission lines are a permitted activity in the proposed TTPP.	Make it clear that underground electricity transmission lines are a permitted activity	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.039	Energy	ENG - R4	Support in part	It is considered that the reference to poles in Clause 4 of this rule needs to be amended to read: "pole structures at its widest point". The addition of the word "structures" makes more practical sense. It is also considered that clause 5 of this rule also needs to also provide for additional poles and assemblies as the current rules (PC145) provide for up to 5 poles to be added as a permitted activity.	Amend as follows: amend the reference to poles in Clause 4 to read: "pole structures at its widest point". Amend Clause 5 to provide for up to 5 additional poles and assemblies.	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.002	Energy	ENG - R6	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed. This risk is caused by there not being any reference to these rules on the planning maps nor in the Zone Chapters.	Include this rule within the zone provisions where significant distribution lines exist.	Support	For the reasons given by the original submitter
Buller Electricity Limited (S451)	S451.003	Energy	ENG - R7	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed.	Include this rule within the zone provisions where significant distribution lines exist.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.080	Energy	Energy Objectives	Amend	This separates the requirement to give effect to the RPS from the second part of Objective 3	Add a new objective as follows: <i>Energy activities, including their operation, maintenance, upgrading or development, are protected from the adverse effects of incompatible subdivision and development.</i>	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.077	Energy	ENG - O1	Amend	The proposed Objective ENG - 01 is supported in part however BEL seek a minor amendment to the objective, as set out below, to ensure it reads correctly.	<i>Amend to read: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities; and provide for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.</i>	Support	For the reasons given by the original submitter

Frank and Jo Dooley (S478)	S478.078	Energy	ENG - O2	Support in part		the objective should be reworded as follows: <i>Have particular regard to the constraints imposed by the technical, locational and operational requirements when seeking to avoid, remedy or mitigate adverse effects on communities and the environment from an energy activities design and location.</i>	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.081	Energy	ENG - O4	Amend		Amend objective to read as follows: <i>To recognise and provide for the national, regional and local significance and benefits of the National Grid, by ensuring the safety, efficiency, operation, maintenance, repair, upgrade and development is not adversely affected by incompatible subdivision, use and development.</i>	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.082	Energy	ENG - P1	Support in part	Buller Electricity seeks minor amendments to enable minor upgrading of important infrastructure in order to give effect to Policy 5 of the NPSET that requires ..."decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets."	Amend to read: <i>Provide for and enable</i> the development, operation, maintenance and upgrading of existing and new electricity transmission, distribution and renewable generation infrastructure and assets.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.084	Energy	ENG - P3	Oppose	Buller Electricity opposes this policy and requests that it is reworded in order to give effect to Policy 10 in the NESET	Amend policy to read: <i>Avoid reverse sensitivity effects from subdivision, use and development on electricity distribution and transmission assets, existing renewable electricity generation activities and associated infrastructure, and protect such infrastructure from adverse effects of activities on the operation, maintenance, upgrading or development of that infrastructure.</i>	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.085	Energy	ENG - P4	Amend	The proposed Policy ENG - P4 is generally supported however a minor amendment is sought as the use of "minimise" in the opening clause is concerning because: - the subsequent clauses seek a number of outcomes that are management approaches; - the term may imply that adverse effects must be made 'minimal' and this outcome may not always be possible; - the NESET does not require effects to be minimised in all circumstances, but refer to the effects being "managed" in the objectives and "avoided, remedied or mitigated" in Policies 3 and 4.	Replace the word "minimise" with "manage" in the policy.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.086	Energy	ENG - P5	Support in part	The proposed Policy ENG - P5 is generally supported however the following minor amendment is sought in order to give effect to the RPS	<i>When considering proposals to develop, operate, maintain and upgrade new and existing energy activities, infrastructure and assets:</i> a. Recognise Have particular regard to the constraints imposed by their functional constraints and operational requirements; and b. Where new transmission infrastructure and major upgrades to transmission infrastructure are proposed have regard to the extent to which any adverse effects have been minimised managed in the route, site and method selection.	Support	For the reasons given by the original submitter

Frank and Jo Dooley (S478)	S478.093	Energy	ENG - R1	Support in part	Rule ENG - R1 (Energy Permitted Activity Performance Standards) is supported in part, however an amendment is sought in order to accommodate any future updates of the referenced documents while also seeking to be consistent with Policy 9 of the NESET. This rule would then also relate to the above proposed additional Policy ENG - 10.	Amend as follows: 1. <i>Electric and Magnetic fields - An activity generating electric or magnetic fields does not exceed the maximum exposure level listed in the International Commission on Non-ionizing Radiation Protection Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz - 100 kHz) (Health Physics (6):818-836; 2010) or revisions thereof</i> , and the recommendations from the 2007 or revisions thereof and any applicable New Zealand standards or National Environmental Standards. World Health Organisation's monograph Environmental Health Criteria 238, June	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.096	Energy	ENG - R4	Support in part	It is considered that the reference to poles in Clause 4 of this rule needs to be amended to read: "pole structures at its widest point". The addition of the word "structures" makes more practical sense. It is also considered that clause 5 of this rule also needs to also provide for additional poles and assemblies as the current rules (PC145) provide for up to 5 poles to be added as a permitted activity.	Amend as follows: amend the reference to poles in Clause 4 to read: "pole structures at its widest point". Amend Clause 5 to provide for up to 5 additional poles and assemblies.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.059	Energy	ENG - R6	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed. This risk is caused by there not being any reference to these rules on the planning maps nor in the Zone Chapters.	Include this rule within the zone provisions where significant distribution lines exist.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.060	Energy	ENG - R7	Amend	There is a significant risk to those using the TTPP in that the provisions contained in the Energy chapter will be missed.	Include this rule within the zone provisions where significant distribution lines exist.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.076	Energy	Overview	Support	Buller Electricity supports the overview in the energy section of the Energy Infrastructure and Transport Chapter.	It is suggested that a comma between Energy and Infrastructure is appropriate - Energy, Infrastructure and Transport Chapter.	Support	For the reasons given by the original submitter
Frank and Jo Dooley (S478)	S478.092	Energy	Permitted Activities	Amend	It is unclear whether underground electricity transmission lines are a permitted activity in the proposed TTPP.	Make it clear that underground electricity transmission lines are a permitted activity	Support	For the reasons given by the original submitter
Inchbonnie Hydro Limited (S540)	S540.001	Energy	Energy	Support	While we support the provisions outlined in the Energy section of the plan, we consider that existing Hydroelectric Infrastructure should be included as a Special Purpose Zone similar to that provided for Mineral Extraction.	Provide for existing Hydroelectric Infrastructure in a specific special zone	Support	For the reasons given by the original submitter
Inchbonnie Hydro Limited (S540)	S540.003	Energy	Energy	Amend	This would be consistent with the WCRPS and NPS Renewable Electricity Generation. There are a number of examples of hydroelectric assets being included in Special Zones in other District Plans in New Zealand. We have provided two examples including the current Queenstown Lakes District Plan and The Central Otago District Plan. Extracts of these Plans are included in the detailed submission.	Provide rules for existing hydroelectric infrastructure within a special purpose zone similar to those in the Queenstown Lakes or Central Otago District Plan	Support	For the reasons given by the original submitter
Lynley Hargreaves (S481)	S481.025	Energy	Energy	Support	I support the provisions that have been included in the draft plan with regard to climate change, such as to allow for the provision electric car and bike charging stations.	Retain the provisions in the chapter that support a transition to low carbon lifestyles.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.035	Energy	Energy	Support in part	The Overview section of the Plan incorrectly refers to the title of the NPS on Renewable Energy Generation. This National Policy Statement applies to Renewable Electricity Generation.	Replace the word 'Energy' in the reference to the NPS with the word 'Electricity' in the second paragraph of the Overview section to read as follows: ... with renewable electricity recognised in the National Policy Statement on Renewable Energy Electricity Generation.	Support	For the reasons given by the original submitter

Manawa Energy Limited (Manawa Energy) (S438)	S438.047	Energy	Energy	Support	Manawa supports the inclusion of note 1 which reiterates where these rules apply to energy and renewable electricity generation activities, the rules in the INF chapter do not apply.	Retain Note 1 as notified.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.033	Energy	Overview	Support in part	The energy chapter covers generation, transmission and distribution of electricity. It inherently covers both renewables and non-renewables, however there is no provision for non-renewable energy nor any deterrent to non-renewable energy activities being established. The development of and continue use of non-renewable energy is not supported by international commitments and national direction and this needs to be made clear in the chapter.as renewable electricity generation activities given the NPS that applies solely to these activities (NPS - RG 2011). Manawa requests that the wording is amended throughout the Plan to refer to Renewable Electricity Generation (as opposed to energy activities) in all supporting policies. Further it requests that a policy be added to avoid the development of non-renewable energy generation activities on the West Coast, and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in energy generation. It is considered inappropriate that non-renewable energy activities, by virtue of inclusion within the definition of 'energy activities', are considered in the same manner	Amend all objectives and policies by removing the reference to 'energy activities' and replacing this with a reference to 'renewable electricity generation activities'. Add a new policy as follows: ENG - P10 Avoid the development of non-renewable electricity generation activities on the West Coast and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.	Oppose	There will always be a need for some non-renewable energy sources to backup the supply when renewables are unavailable. For Example Haast currently relies on a diesel backup generator when the hydroelectric scheme is out of service or the transmission system is damaged or requires repair.
Manawa Energy Limited (Manawa Energy) (S438)	S438.036	Energy	ENG - O1	Support in part	Manawa supports this provision, however requests that changes are made to terminology used in the objective to ensure that there is consistency between amendments sought to other parts of the Plan. Manawa considers it essential that Renewable Electricity Generation activities are provided for within the pTTPP to give effect to the provisions of the NPS - REG.	Amend ENG - O1 as follows: To recognise the local and regional benefits of electricity transmission, distribution and renewable electricity generation activities, by providing for their development, operation, maintenance and upgrading to meet the needs of Te Tai o Poutini/the West Coast.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.037	Energy	ENG - O2	Support in part	Manawa considers that the use of the term 'minimise' is not consistent with terminology used in current Resource Management Act legislation, and therefore it is unclear what the level of outcome anticipated by this term involves. Manawa requests that the term 'minimise' should be replaced with the with 'avoid, remedy or mitigate' terminology provided by the Act as in different circumstances different aspects of the effects management hierarchy may be appropriate. Manawa also requests that the wording of policy be restructured to provide greater clarity and direction to Plan users, and that reference to ensure consistency in terminology used in other national policy documents. to functional and operational needs be retained	Amend ENG - O2 as follows: To recognise the functional and operational needs associated with the location and design of renewable electricity generation energy activities, and to avoid, remedy or mitigate any adverse effects of these activities on communities and the environment.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.038	Energy	ENG - O3	Support in part	Manawa supports the recognition of the need to provide for renewable electricity generation and the recognition of the potential for reverse sensitivity effects on renewable electricity generation activities (as is required to be addressed in the NPS - REG). It is however considered better to separate these two concepts for clarity. It is also suggested that terminology used is amended to ensure consistency with earlier comments and terminology used in the Resource Management Act 1991.	Amend ENG - O3 as follows: To provide for the development, operation, maintenance and upgrade of energy renewable electricity generation activities and to protect them from the adverse effects of incompatible subdivision, use and development	Support	For the reasons given by the original submitter

Manawa Energy Limited (Manawa Energy) (S438)	S438.040	Energy	ENG - P3	Support in part	Manawa supports the intent of this policy, however, considers that it could be expressed in a manner more consistent with a similar policy included in the INF chapter (policy 3) and more closely aligned to the approach directed by the NPS-REG.	Amend ENG - P3 as follows: Avoid reverse sensitivity effects from incompatible subdivision, use and development on renewable electricity generation and electricity transmission and distribution activities.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.042	Energy	ENG - P4	Support in part	Manawa supports the intent of this policy, however, considers that it needs to be updated to clearly reference renewable electricity generation and to use established terminology that is well understood rather than 'minimise'.	Amend ENG - P4 as follows: Avoid, remedy or mitigate adverse effects on communities and the environment from energy renewable electricity generation and electricity transmission and distribution activities by: • Having regard to.....	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.044	Energy	ENG - P6	Support	Manawa supports the intent of the policy, however requests that there is no distinction made between varying scales of renewable generation activities.	Amend ENG - P6 as follows: Provide for the development, upgrading, maintenance and operation of: a. A range of renewable electricity generation activities ; and b.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.046	Energy	Energy Rules	Not Stated	Manawa is very supportive of the separation of rules applying to Renewable Electricity Generation activities from those relating to INF activities. Manawa's primary concern with the ENG rules is the extent to which these provide for the construction, operation, maintenance and upgrade of Renewable Electricity Generation activities in a manner consistent with the provisions of the NPS - REG 2011. This concern relates to the manner in which the Plan differentiates between Renewable Electricity Generation activities of various types and scales (and the terminology used in the Plan to express these differences), and the activity status afforded to these activities. As presently set out, Manawa does not consider that the energy chapter provisions give effect to the NPS-REG as they do not enable continuation of existing activities and establishment of new activities. Definitions Specific submission points applying to Renewable Electricity Generation activities have been addressed in submissions on the Interpretation section of the Plan set out above. In particular, Manawa opposes the distinction between Renewable Electricity Generation activities based on the current definitions of the terms 'small scale', 'community scale' and 'large scale'. Manawa seeks to ensure that the terminology used in the pTTPP is consistent with that in the NPS - REG 2011. Manawa has also sought the inclusion of a definition for the term 'minor upgrade'. It considers that this is appropriate and is already used throughout the Plan. Manawa requests that the submission points in the remainder of this section reflect changes sought to terminology used in the Plan. Provision for the Operation, Maintenance, Upgrading and Establishment of Renewable Electricity Generation activities The rules mix activities relating to existing	See definitions requests above. Amend terminology used in the ENG chapter to reflect the relief sought for changes to definitions, especially defined terms of: • small and community- scale distributed electricity generation • minor upgrade • regionally significant infrastructure. Amend the structure of the rules to clearly step through the different activities relating to existing and new activities. Amend rules to ensure that activity status that applies gives effect to the NPS-REG and other higher order documents	Support	For the reasons given by the original submitter

Manawa Energy Limited (Manawa Energy) (S438)	S438.057	Energy	Energy Rules	Support	Manawa also considers that any energy activities that do not involve renewable electricity generation should be dealt with as non-complying activities. This would be consistent with the intent of the national policy framework, and New Zealand's climate change obligations.	Add a new rule ENG - R21: ENG-R21 Non-renewable Electricity Generation Activities Activity Status: Non- Complying	Oppose	There will always be a need for some non-renewable energy sources to backup the supply when renewables are unavailable. For Example Haast currently relies on a diesel backup generator when the hydroelectric scheme is out of service or the transmission system is damaged or requires repair.
Manawa Energy Limited (Manawa Energy) (S438)	S438.049	Energy	ENG - R5	Support in part	Manawa supports this rule in part as it is essential that there be a permitted activity rule providing for the ongoing operation of renewable electricity generation activities and for the establishment of new smaller scale facilities. However, Manawa considers that: the terminology within the rule should be altered to apply to small and community scale distributed electricity generation use rather than simply small-scale activities (as previously discussed in the definitions section). provision should be made for the operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities as a permitted activities. At present the rules are entirely silent on the ongoing use of existing activities and there is no obvious activity status for this. At worst, this could mean that maintenance on large hydroelectricity structures is a discretionary activity. Clearly this is not appropriate. Amending this rule to explicitly provide for existing activities would ensure consistency with the provisions of the NPS - REG and is considered essential for the ongoing operation of these facilities, the nature of associated hazards within the West Coast and the associated necessity to ensure resilience of such (as it reflected in the strategic direction provisions of the pTTPP). wind turbines do not need to be specified as 'small scale' as the performance standards for this rule limit them in height and scale. If a maximum number of turbines or a maximum scale of facility is considered necessary to ensure that this rule only allows smaller scale facilities to be permitted, then an additional performance standard can be added to limit the generation from such facilities	Replace ENG - R5 with the following: ENG - R5 The construction, operation, maintenance, repair and upgrade of renewable electricity structures for small and community scale electricity generation, and The operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities. Activity Status Permitted Where: 1. Performance standards in Rule ENG - R1 are complied with; Solar panels do not exceed the permitted height in the relevant zone by more than 0.25m vertically; Wind turbines do not exceed 8m in height; Wind turbines comply with NZS 6808:2010 Acoustics - Wind Farm Noise; Structures, buildings or impermeable surface for hydroelectricity generation must not exceed a footprint of 100m2 or an increase in area from existing buildings/structures and surfacing of more than 10%; and Any building or structure must not be located within an existing esplanade reserve or strip. The maximum generation capacity for new small and community scale generation activities is 500kW. Activity status where compliance not achieved: Restricted Discretionary where performance standards 2, 3, 5, 6 and 7 are not complied with. Discretionary where performance standard 4 is not complied with. Non-complying where performance standard 1 is not complied with.	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.050	Energy	ENG - R9	Support	Manawa supports the inclusion of rules in the pTTPP enabling temporary activities required following the declaration of a national, regional or local state of emergency declaration to be undertaken as a permitted activity. These activities are vital to the functioning of regionally significant infrastructure, such as Renewable Electricity Generation activities, and the ability for the West Coast to recover from such events as quickly as possible without incurring delays and costs associated with obtaining any required resource consents. However minor consequential amendments have been suggested.	Amend ENG – R9 as follows: ENG - R9 Temporary Electricity Generaton Activites Where: 1. The temporary electricity generaton activity is for up to a period of 24 months following a natonal, regional or local state of emergency declaraton; 2. All performance standards in Rule ENG - R1 are complied with; and 3. Any temporary structures are removed from the site when operaton ceases and the site is rehabilitated.	Support	For the reasons given by the original submitter

Manawa Energy Limited (Manawa Energy) (S438)	S438.051	Energy	ENG - R10	Support	<p>Manawa supports the inclusion of a specific rule for environmental monitoring and extreme weather event monitoring facilities, and meteorological facilities as permitted activities. These facilities also play a role in the operation of Renewable Electricity Generation activities, provide important information and are often required to ensure compliance with conditions of resource consent. However, Manawa considers that: the height and structure footprint provided for as a permitted activity under this rule is insufficient to be meaningful in providing for investigations into meteorological conditions. Slimline masts and towers should be provided for to a greater height. the activity status for larger monitoring structures should not be non-complying as this would not be consistent with other structures in generally rural areas and would not give effect to the NPS-REG which seeks to enable such activities.</p>	<p>Amend ENG – R10 as follows: 1. All performance standards in Rule INF - R1 are complied with; and 2. Monitoring equipment is limited to: a. Masts and towers with a maximum footprint of 4m2 and a maximum height of 10m, or b. Other structures up to 4m in height and 25m2 in area. Activity status where compliance not achieved: Restricted Discretionary where performance standard 2 is not complied with. Non-complying where performance standard 1 is not complied with.</p>	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.053	Energy	ENG - R15	Oppose	<p>Manawa strongly opposes ENG - R15 as currently drafted. It does not consider that this rule gives sufficient effect to the provisions of the NPS - REG as it makes most renewable electricity generation projects straight into discretionary activity status. This is not appropriate when it is national direction to provide for significant increases in renewable electricity generation. for the maintenance, repair, operation and minor upgrading of existing renewable electricity generation activities (ie those Renewable Electricity Generation activities at a scale not meeting the definition of small and community scale distributed electricity generation) these automatically end up as discretionary activities under this rule. That is unreasonable as the ongoing operation of such activities is essential to the resilience and well being of the region, as well as to meeting the national direction.</p> <p>Manawa seeks that the rule is amended to restricted discretionary activity status, reworded for clarity and other amendments to the rule to ensure consistency with other parts of its submission (particularly those relating to terminology).</p> <p>Further, because there is no rule that provides for the maintenance, repair, operation and minor upgrading of existing renewable electricity generation activities (ie those Renewable Electricity Generation activities at a scale not meeting the definition of small and community scale distributed electricity generation) these automatically end up as discretionary activities under this rule. That is unreasonable as the ongoing operation of such activities is essential to the resilience and well being of the region, as well as to meeting the national direction.</p> <p>Manawa seeks that the rule is amended to restricted discretionary activity status, reworded for clarity</p>	<p>Amend ENG – R15 as follows: Upgrades, other than minor upgrades, and construction of renewable electricity generation activities (excluding wind) and renewable electricity generation activities not meeting rules R5, R9 and R10. Restricted Discretionary Activities Discretion is limited to: a The benefits of the proposal to Aotearoa New Zealand meeting its zero carbon, climate change and greenhouse gas targets; b The benefits of the proposal to the local and regional community and to resilience for Te Tai o Poutni / the West Coast; c Any functional needs and operational needs associated with the design or location of the proposal; d The ability to mitigate any adverse effects of the proposal on the environment; e The degree to which the proposed activity will cause significant adverse effects on values identified and protected through Overlay Chapter provisions. Activity status where compliance not achieved: N/A</p>	Support	For the reasons given by the original submitter

Manawa Energy Limited (Manawa Energy) (S438)	S438.054	Energy	ENG - R16	Support in part	Manawa does not consider it appropriate to single out wind farms and to give them an activity status that is restrictive. Many other comparable district plans place wind farms at restricted discretionary activity status and this is an appropriate status to give effect to the NPS-REG. Further, to simplify the provisions, this wind farm rule could be combined with rule R15 above. Manawa also considers it inappropriate that a wind farm unable to comply with NZS 6608: 2010 Acoustics - Wind Farm Noise is afforded non-complying activity status. It is considered that discretionary status is appropriate to enable full consideration of the effects of wind farm noise. Discretionary activity status is commonly applied in other district plans that provide for wind farm noise above the NZS.	Amend ENG - R16 as follows Activity Status Restricted Discretionary Where: 1. This does not comply with New Zealand Standard NZS6808:2010 Acoustics - Wind Farm Noise. Discretion is limited to: Degree of non-compliance with ENG - R5; Locational, technical and operational constraints; Benefits to the community. Activity status where compliance not achieved: Non complying Discretionary	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.055	Energy	ENG - R17	Oppose	Manawa considers it inappropriate that a wind farm unable to comply with NZS 6608: 2010 Acoustics - Wind Farm Noise is afforded non-complying activity status. It is considered that discretionary status is appropriate.	Amend ENG - R17 as follows: ENG - R17 Any energy renewable electricity generation activity which does NZS6808:2010 Acoustics - Wind Farm Noise. Activity Status Discretionary	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.056	Energy	ENG - R20	Oppose	Manawa considers that the non-complying status of renewable electricity activities not permitted, controlled, restricted discretionary or discretionary is not appropriate and does not reflect the enabling provisions and direction of the NPS - REG and the RPS. It considers that these activities should be provided for as restricted discretionary or discretionary activities. To achieve this, none of the renewable electricity activities should be covered by this rule.	Amend ENG - R20 as follows: Energy Activities that do not meet Rules ENG - R12, or ENG - R13 Activity Status: Non-Complying	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.045	Energy	Energy Policies	Support	The energy chapter covers generation, transmission and distribution of electricity. It inherently covers both renewables and non-renewables, however there is no provision for non-renewable energy nor any deterrent to non-renewable electricity activities being established. Non-renewable electricity generation is not supported by national direction and this needs to be made clear in the chapter. It is considered inappropriate that non-renewable energy activities, by virtue of inclusion within the definition of 'energy activities', are considered in the same manner as renewable electricity generation activities given the NPS that applies solely to these activities (NPS - REG 2011). Manawa requests that the wording is amended throughout the Plan to refer to Renewable Electricity Generation (as opposed to energy activities) in all supporting policies. Further it requests that a policy be added to avoid the development of non-renewable energy generation activities on the West Coast, and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.	Add a new policy as follows: ENG - P10 Avoid the development of non-renewable electricity generation activities on the West Coast and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in electricity generation.	Oppose	There will always be a need for some non-renewable energy sources to backup the supply when renewables are unavailable. For Example Haast currently relies on a diesel backup generator when the hydroelectric scheme is out of service or the transmission system is damaged or requires repair.

Manawa Energy Limited (Manawa Energy) (S438)	S438.039	Energy	ENG - P2	Support in part	Manawa generally supports this policy, however requests that changes are made to provide clarity that the intent of the policy is to include new activities, as well as existing activities.	Amend ENG - P2 as follows: When considering proposals to develop and operate new and existing energy renewable electricity generation, electricity transmission and distribution activities, have particular regard to the benefits to be obtained from the proposal, including: a. Maintaining or increasing security of renewable electricity supply by diversifying the type and/or location of renewable electricity generation.....	Support	For the reasons given by the original submitter
Manawa Energy Limited (Manawa Energy) (S438)	S438.043	Energy	ENG - P5	Support in part	Manawa requests that amendments are made to this policy to ensure consistency throughout the Plan in the use of defined terms and in referencing renewable electricity rather than energy generally.	a. Amend ENG - P5 as follows: When considering proposals to develop, operate, maintain and upgrade new and existing energy renewable electricity generation activities: Recognise their functional needs constrains and operational needs requirements; and ...	Support	For the reasons given by the original submitter
Margaret Montgomery (S446)	S446.006	Infrastructure	Infrastructure Objectives	Support	Support the operation and maintenance of critical infrastructure;	Retain provisions that allow for the operation and maintenance of critical infrastructure.	Support	For the reasons given by the original submitter
Paul Finlay (S408)	S408.001	Energy	Energy Rules	Support	The West Coast must be able to be self sufficient in energy generation. The provision is for accessway for above ground pressure pipelines with regular holding down anchorages, tunneling where required and diversion of flood flow under the phenomena of Climate Change, increased rainfall and flooding to State Highways and tourist townships and infrastructure. The Wills River, tributary of the Haast River, Haast township is given. Tunnel to unknown, unnamed stream, increased flow to Hunter River, to Lake Hawea, and downstream Otago irrigation schemes.	That provision be made for and understanding of the critical need for the reliance on hydro power generation, in respect of resilience pre and post Alpine Fault Rupture, and Climate Change required irrigation.	Support	For the reasons given by the original submitter
Paul Finlay (S408)	S408.002	Infrastructure	Infrastructure Rules	Amend	Provision for an area of 2000m2 (C. 50m x 40m) at a location near Martyr Saddle, Martyr River, South Westland. Purpose : Erection of a building, with instruments and antennae for relaying the first movement of rupture of the Alpine Fault.	Ensure rules provide for monitoring building and equipment to pick up the movement of the plates and Alpine Fault.	Support	For the reasons given by the original submitter
Suzanne Hills (S443)	S443.015	Energy	ENG - P2	Amend	There is no consideration of cumulative effects of multiple small scale run-of-river hydro schemes that would result in the degradation of multiple wild rivers/creeks compared with generation benefits of larger schemes on already degraded landscapes or utility scale wind. The wild unmodified creeks and rivers of the West Coast are an asset to nature tourism, public recreation and ecosystem health and integrity. With the majority of rivers around the globe now modified in some form, we should be placing the highest value on the remaining wild creeks and rivers of the West Coast.	Amend policy to reflect the cumulative effect of multiple hydro schemes.	Oppose	Developments should be assessed on a case by case basis.

West Coast Regional Council (S488)	S488.008	Infrastructure	INF - R5	Amend	Some of the existing hydrology structures in remote hill and mountain areas have antennae that are more than 4m in height, to avoid radio interference caused by surrounding mountains and terrain. Future new monitoring structures in the same type of topography may also not meet the 4m height limit for the same reason. Hydrology staff advise that the Haast River @ Deelaw structure located at Mt Deelaw is the tallest monitoring structure at approximately 7- 8m. It needs to be this high as it has a long distance to broadcast rainfall data. The environmental effects of taller hydrology monitoring structures and aeriels is minimal in remote locations. Council considers that in these situations, the 4m height limit is unreasonable, especially as it is a substantial change from the 30m height limit in Rural Zones in the operative District Plans. Given the large area of rural and Public Conservation Land on the West Coast, and that there will not be a proliferation of hydrology monitoring structures, Council seeks that permitted Rule INF - R5 be amended to provide for a height limit for hydrology monitoring structures of 10m, to provide for future extensions to the network.	Amend the height limit in the Permitted Infrastructure Rule INF - R5, Condition 1 to 10m.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.066	Energy	Overview	Amend	Makes no comment about the actual West Coast situation.	Add new 2nd paragraph: It is also recognised that Energy Activities, including Critical Infrastructure, do already exist, and given the topography of the West Coast may in the future require location, within the full range of natural and built environments of the region. The establishment and provision of Energy Activities, including renewable generation, provides for the maintenance and enhancement of the communities cultural, economic and social wellbeing, including health and safety, and assists with developing resilient communities on the West Coast.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.067	Energy	Overview	Amend	Does not state the importance of renewable electricity activities.	Amend existing 2nd paragraph: The National Policy ... protection of the National Grid. The National Policy Statement for Renewable Energy Generation recognises the national significance of renewable electricity generation activities, including the need for, and benefits from. renewable electricity generation.	Support	For the reasons given by the original submitter

Westpower Limited (S547)	S547.068	Energy	Overview	Amend	<p>(1) The overview highlights various statutory requirements and recognition is needed in that regard.</p> <p>(2) The existing 2nd paragraph advises that renewable electricity is recognised in the National Policy Statement for Renewable Electricity Generation (the NPSREG) but does not state the importance of such activities. The statement should be amended to reflect the national significance of the issue.</p> <p>(3) The last paragraph provides that the "Infrastructure Chapter" and "Area Specific Provisions (Zone Chapters)" do not apply to Energy Activities. That clarification/statement is supported as it provides for energy activities and associated infrastructure in an appropriate manner. Zone provisions do not appropriately recognise or provide for these activities. Given the intent the requirements should be included in the "Other Relevant Provisions" section of this Chapter for plan interpretation and implementation purposes.</p>	<p>(1) Add new 2nd paragraph: It is also recognised that Energy Activities, natural and built environments of the region. The establishment and provision of Energy Activities, including renewable generation, provides for the maintenance and enhancement of the communities cultural, economic and social wellbeing, including health and safety, and assists with developing resilient communities on the West Coast.</p> <p>(2) Amend existing 2nd paragraph (proposed 3rd paragraph in this submission), "The National Policy ... protection of the National Grid. The National Policy Statement for Renewable Energy Generation recognises the national significance of renewable electricity generation activities, including the need for, and benefits from, renewable electricity generation.</p> <p>(3) Retain the provision "the Infrastructure Chapter and the Area Specific Provisions (Zone Chapters) do not apply to Energy Activities" but move under the heading "Other Relevant Te Tai o Poutini Provisions".</p>	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.069	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	It is unclear at times whether provisions that do not refer to "Energy Activities" apply.	Provide an explanatory note to clarify applicability of provisions that do not specifically reference Energy Activities.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.070	Energy	Other relevant Te Tai o Poutini Plan provisions	Amend	There is reference to "Infrastructure", and this should be amended to "Energy Activities"	Amend Financial Contributions bullet point, ... activities which impact on Energy Activities.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.072	Energy	Energy Objectives	Amend	The current wording of the objectives does not reflect or give effect to the RPS.	Add new Objective: To enable the safe, efficient and integrated development, operation, maintenance and upgrading of Energy Activities, including related Infrastructure and Critical Infrastructure, to meet the needs of the West Coast/Te Tai o Poutini.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.073	Energy	Energy Objectives	Amend	There is no objective for co-ordinating the provision and use of energy activities.	Add new objective: To ensure the efficient provision and use of Energy Activities, including Critical Infrastructure, for communities by co-ordinating the provision of Energy Activities with subdivision, use and development.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.077	Energy	Energy Objectives	Amend	Separated ENG-02, with the new objective proposed.	New Objective: To manage adverse effects of Energy Activities on the environment while recognising and providing for the matters in Objectives ENG-01 and ENG-02."	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.080	Energy	Energy Policies	Amend	Fragments "Energy Activities" from "Infrastructure" using a range of terms.	Amend to ensure consistency of terms and provisions for energy activities throughout the plan.	Support	For the reasons given by the original submitter

Westpower Limited (S547)	S547.081	Energy	Energy Policies	Amend	there is also provision for the "Significant Electricity Distribution Line"	Add a new Policy: Manage activities in and around Significant Electricity Distribution Lines to: a. Ensure the safe and efficient operation, maintenance, repair, upgrading and development of the lines are not compromised by subdivision, use and/or development; b. Avoid incompatible land use; c. Achieve compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZCEP 34:2001) and avoid health and safety risks from distribution lines; andd. Avoid potential reverse sensitivity effects on distribution lines.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.082	Energy	Energy Policies	Amend	it is relevant to have policy provision in this chapter for subdivision.	Add a new Policy: Ensure that subdivision and development is adequately serviced including; a. supply of electricity using a method that is appropriate to the type of subdivision and/or development, including consideration of alternative methods on a case by case basis, and b. where new energy infrastructure is developed and/or installed, that there is adequate provision for ongoing access, operation and maintenance, including through granting and reserving	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.083	Energy	Energy Policies	Amend	The adoption of new technology would apply to energy activities.	New Policy: Provide flexibility for energy activities, including energy aspects of infrastructure and critical infrastructure, to adopt new technologies that; a. improve access to, and efficient use of, networks and services;b. allow for the re- use of redundant services and structures where they are safe and operating to required standards;c. increase resilience, safety or reliability of networks and services;d. result in environmental benefits and/or enhancements; ore. promote environmentally sustainable outcomes including green infrastructure and the increased utilisation of renewable resources.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.084	Energy	ENG - P1	Amend	Whilst the intent of this policy is supported an amendment is required to ensure that it includes all aspects of Energy Activities, particularly given the multiple terms and definitions that may apply to energy	1) Amend ENG-P1, "Provide for the development ... and upgrading of existing and new Energy Activities, including energy related aspects of Infrastructure and Critical Infrastructure."	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.088	Energy	ENG - P3	Amend	the wording is not sufficient to give effect to the issue, or the RPS.	Amend to read: Protect energy activities, including energy aspects of infrastructure and critical infrastructure, from the reverse sensitivity effects arising from incompatible new subdivision, use and development, and the adverse effects of other activities, which would compromise the effective operation, maintenance, upgrading or development of energy activities and associated infrastructure.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.089	Energy	ENG - P4	Amend	The intent of the Act and the following parts of the policy is management.	Minimise-Manage adverse effects on the environment from energy activities by: ...	Support	For the reasons given by the original submitter

Westpower Limited (S547)	S547.090	Energy	ENG - P4	Amend	This policy requires some amendment to ensure the outcomes sought are achieved in a manner appropriate to energy activities, the role they play in the community, and the environment. (1) As discussed above there are potential issues with reference to a requirement to "minimise" all effects when the intent of the Act and the following parts of the policy is management. It is also noted that the wording differs to the equivalent "Infrastructure" policy, ie adverse effects on the environment, and amendment is required in that regard. (2) Item "a." is aimed at the overlay chapters but appears to have wording related to zone provisions (i.e. Urban Amenity, Recreational Areas) which the plan specifically advises the Energy Activity chapter is not subject to. This wording should be amended to reflect the intent of the proposed plan. Accordingly "a." should be amended to remove these matters. (3) Item "c." should be amended to	1) Amend the preamble to ENG-P4, "Manage adverse effects on the environment from energy activities by:". (2) Amend item a., "a. Having regard to the values associated with areas identified as having significant environmental values, outstanding and high natural character areas outstanding landscapes and features, Poutini Ngai Tahu and heritage sites, and significant natural areas;". (3) Amend item c., "c. Maintaining ongoing access to grid and distribution infrastructure and assets for operation, maintenance and upgrading works; and"	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.091	Energy	ENG - P4	Amend	To provide for infrastructure and assets and include access for operation and maintenance.	c. Maintaining ongoing access to grid and distribution elements and structures for infrastructure and assets for operation , maintenance and upgrading works; and ...	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.092	Energy	ENG - P5	Amend	Not all energy activities require a resource consent different terminology should be used.	Amend: When considering proposals to develop, operate, maintain and upgrade managing the development, operation, maintenance and upgrading of new and existing energy activities; ...	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.094	Energy	ENG - P6	Support		Retain	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.095	Energy	Energy Rules	Support	The section of "notes" is supported.	Retain "Notes" section.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.096	Energy	Energy Rules	Amend	Plan complexity and number of rules which may apply to energy activities..	Consider reformatting the chapter to include all relevant rules from throughout the plan to enable a more efficient assessment of compliance, and ease of use and implementation of the plan.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.099	Energy	ENG - R2	Amend	Some amendments are required to adequately provide for those activities in other zones.	Amend 2. This is the operation, maintenance repair and upgrade of an existing substation (zone) where any new works and/or upgrades are undertaken within existing switchyards or the existing building envelope , in any zone:	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.100	Energy	ENG - R2	Amend	upgrading should be removed from item 3. As it is already provided for.	Amend 3. This is a new substation (zone) or upgrade to an existing substation (zone) : ...	Support	For the reasons given by the original submitter

Westpower Limited (S547)	S547.101	Energy	ENG - R2	Amend	Majority of substations are located within the Rural Zone,	Amend 3 i. Located in an Industrial or Rural zone; and ii. Screening is provided between any new substation and a road and any residential building located outside the Industrial zone ...	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.102	Energy	ENG - R2	Amend	Clarification of requirements for screening in item 3.ii. are required.	3. This is a new substation (zone) : i. Located in an Industrial or Rural zone; and ii. Screening is provided between any new substation and a road and any existing residential building by fencing and/or landscaping (including earth bunds).	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.103	Energy	ENG - R3	Support	This rule provides for operation of the network to supply consumers.	Retain	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.104	Energy	ENG - R4	Amend	To ensure there is no ambiguity at the time of administration/implementation.	Amend rule heading to clearly define permitted activities: • Operating existing transmission and distribution lines, including connections to consumers. • New distribution and transmission lines, including connections to consumers. • Maintaining, repairing, minor upgrading, strengthening, upgrading and replacing of transmission and distribution lines, including connection to consumers and support structures and foundations not managed by the National Environmental Standard for Electricity	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.106	Energy	ENG - R5	Amend	Based on the definition of minor upgrading submitted to remove any duplication.	Review items 2.-9. of the rule and delete duplication with matters provided for in the definition of minor upgrading submitted above.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.107	Energy	ENG - R6	Amend	To ensure that the outcomes sought are achieved and correct reference to line type.	Amend 3.iv., "iv. Structures used for ... buildings for sensitive activities; and ... (2) Incorporate rule ENG-R6 into the rules in all zones, including the proposed rule for noncomplying activities where compliance is not achieved as submitted below. 5. Structures and activities located near distribution transmission lines must comply with the safe distance ..."	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.108	Energy	ENG - R6	Amend	To ensure it is not overlooked when undertaking activities in those zones.	Incorporate rule ENG-R6 into the rules in all zones, including the proposed rule for non-complying activities where compliance is not achieved as submitted below.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.110	Energy	ENG - R9	Support	Provides for emergency situations and the ongoing supply of energy.	Retain	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.111	Energy	ENG - R10	Support	Provides for monitoring and measurement facilities.	Retain	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.112	Energy	ENG - R11	Amend	amendments are required in order for the rule to provide for functional matters.	Amend b. Locational, technical, functional and operational constraints;	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.113	Energy	ENG - R11	Amend	It appears to relate to the potential for discharges which will be regulated by regional plan.	Delete item e.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.114	Energy	ENG - R12	Amend	To refer to the relevant rules to which this activity category relates.	Delete existing heading and amend rule heading: ENG R12 Activities not meeting permitted activity standards of ENG-R4 and ENG-R4A (Proposed new Rule)	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.115	Energy	ENG - R12	Amend	Refer to the proposed new rule ENG-4A for distribution lines, including customer connections.	Amend item a. Degree of non-compliance with Rule ENG-R4 and ENG-R4A .	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.116	Energy	ENG - R13	Amend	To be amended to include reference to "functional" matters as defined in the plan.	Amend item a. Locational, technical, functional and operational constraints.	Support	For the reasons given by the original submitter

Westpower Limited (S547)	S547.117	Energy	ENG - R14	Amend	For consistency between plan provisions.	Amend item d. Locational, technical , functional and operational constraints;	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.118	Energy	ENG - R15	Amend	For large scale generation activities in the Industrial zone.	Amend rule heading: ENG-R15 Large scale ... excluding wind not meeting Permitted Activity standards.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.119	Energy	Non-complying Activities	Amend	Does not include reference to Rule ENG-R6.	Insert new Rule for activities not in compliance with Rule ENG-R6: Activities in and around the Significant Electricity Distribution Lines that do not comply with Permitted Activity standardsActivity Status Non-ComplyingActivity Status where compliance not achieved: N/A.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.120	Energy	ENG - R20	Amend	It already seems to be provided for in proposed ENG-R18.	Consider whether this rule is required or could be incorporated into ENGR18.	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.097	Energy	Permitted Activities	Amend	Rule ENG-R4 is silent as to when new lines are required to be placed underground or may be above ground.	Add a new Rule: Distribution Lines (including connection to consumers) Activity Status Permitted Where:1. New lines are underground where located in RESZ - Residential, or CMUZCommercial and Mixed Use Zones; or2. Existing above ground lines are located within the zones identified in 1. and are extended by no more than 5 poles; or 3. are above ground within SASM sites within the zones identified in 1. for the purpose of maintaining the values of the SASM site, and3. poles for above ground lines do not exceed a height of 25m.Activity status where compliance is not achieved: Restricted	Support	For the reasons given by the original submitter
Westpower Limited (S547)	S547.105	Energy	ENG - R4	Amend	To enable the permitted activities provided for to be achieved in a safe and secure manner.	Amend: 4. The diameter or width of ... at its widest point and; where a single pole is replaced with a pi pole, the width of the pi pole structure must not exceed three times that of the replaced pole 5 metres at its widest point and 5. Additional conductors or lines ... of the original. Where additional conductors or lines are installed any intermediate poles required to achieve electrical safety standards can also be installed.	Support	For the reasons given by the original submitter