

Form 5

**Submission on publicly notified proposal for policy statement or plan, change or variation
Clause 6 of Schedule 1, Resource Management Act 1991**

To: TTPP Submissions
PO Box 66
Greymouth 7840

Name of submitter: Chorus New Zealand Limited
PO Box 632
Wellington

Spark New Zealand Trading Limited
Private Bag 92028
Auckland 1010

Vodafone New Zealand Limited
Private Bag 92161
Auckland 1142

This is a submission on the following proposed plan, change or variation: **Proposed Te Tai o Poutini Plan (Combined District Plan for the West Coast)**

Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone) have lodged a joint submission to the Proposed Te Tai o Poutini Plan.

Chorus, Spark and Vodafone could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that the submission relates to, the submission points, reasons and decisions sought are detailed in the attached large submitter bulk submission template spreadsheet. Chorus, Spark and Vodafone seek that the decisions sought as set out in the attached table are adopted, or any other such relief and/or consequential amendments that achieves an equivalent outcome.

Chorus, Spark and Vodafone wish to be heard in support of their submission. If others make a similar submission, Chorus, Spark and Vodafone will consider presenting a joint case with them at a hearing.



Signed:

On behalf of Chorus New Zealand Limited

Date: 23 September 2022

Not yet authorised



Signed:

On behalf of Spark New Zealand Trading Limited

Date: 23 September 2022

Not yet authorised



Signed:

On behalf of Vodafone New Zealand Limited

Date: 23 September 2022

Not yet authorised

Address for Service:

Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited

C/- Incite

P O Box 3082

Auckland 1140

Contact Details:

Attention: Chris Horne

Telephone: 027 4794 980

E-mail: chris@incite.co.nz

Instructions: This spreadsheet template has been made available to assist submitters wishing to make submissions on a significant number of provisions in the Proposed Plan.

If you are using this spreadsheet, please also complete a submission form with the details of the submitter. This can be done by either:

1. downloading and completing a submission form from the Council's website and lodging the form and this spreadsheet via email to info@tpp.nz; or
2. using the online submission tool accessible from the Council's website to upload this document as a supporting document. If you choose this method, please add one submission point to your online submission and select [General] as the Plan Section and [General] as the Provision.

To add your submission points to this spreadsheet, please scroll to the relevant Plan Section and click the '+' symbol to expand the group to show all of the provisions within that section. In the row containing the provision you wish to submit on, select one of the options from the Support/oppose column (click in the relevant cell and an arrow button will appear that presents a dropdown list). Add the reasons and the decision you seek in the next two columns. Please ensure you add both reasons and decision sought as these are an important part of your submission. If you are asking for a new provision to be added to a section, please include that in the row for the first provision in that section (the spreadsheet does not allow new rows to be added). Similarly, if you wish to make a submission that relates to a whole section of the Plan, please include that in row for the first provision in that section.

If you require any assistance with using this spreadsheet, please contact the District Plan team at info@tpp.nz.

Plan section	Provision	Support Oppose	Reasons	Decision sought
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[General]

Whole Plan

Introduction Section

How The Plan Works Section

Interpretation Section

Interpretation	Interpretation
Interpretation	Definitions
Interpretation	Advice Note
Interpretation	ACCESSORY BUILDING
Interpretation	ACCESSWAY
Interpretation	ACTIVITY
Interpretation	ADDITION
Interpretation	ADDITIONS AND ALTERATIONS
Interpretation	ADJACENT
Interpretation	ADJOINING
Interpretation	AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES
Interpretation	AIRPORT ACTIVITIES
Interpretation	ALLOTMENT
Interpretation	AMENITY VALUES
Interpretation	ANCILLARY ACTIVITY
Interpretation	APPROVED BUILDING PLATFORM
Interpretation	ARCHAEOLOGICAL SITE
Interpretation	AREA OF SIGNIFICANT INDIGENOUS BIODIVERSITY
Interpretation	ARTIFICIAL LAKE OR POND
Interpretation	BED
Interpretation	BOUNDARY ADJUSTMENT
Interpretation	BROWNFIELD
Interpretation	BUILDING
Interpretation	BUILDING FOOTPRINT
Interpretation	BUILDING PLATFORM
Interpretation	CAMPING GROUNDS
Interpretation	CEMETARIES
Interpretation	CLEANFILL
Interpretation	COASTAL ENVIRONMENT
Interpretation	COMMERCIAL ACTIVITY
Interpretation	COMMUNITY CORRECTIONS ACTIVITY
Interpretation	COMMUNITY FACILITIES, EDUCATION FACILITIES and HEALTH FACILITIES
Interpretation	COMMUNITY FACILITY
Interpretation	COMMUNITY SCALE
Interpretation	COMMUNITY SIGN
Interpretation	CONSERVATION ACTIVITIES

Interpretation	CONTAMINATED LAND
Interpretation	COUNCIL ENGINEERING STANDARDS
Interpretation	CRITICAL INFRASTRUCTURE
Interpretation	CRITICAL RESPONSE FACILITIES
Interpretation	CULTURAL LANDSCAPE
Interpretation	DUST
Interpretation	EARTHWORKS
Interpretation	EDUCATIONAL FACILITY
Interpretation	EMERGENCY SERVICE FACILITY
Interpretation	ENERGY ACTIVITY
Interpretation	ESPLANADE RESERVE
Interpretation	ESPLANADE STRIP
Interpretation	EXISTING BUILDINGS AND STRUCTURES
Interpretation	EXISTING USE RIGHTS
Interpretation	FAÇADE CONTROL STREET
Interpretation	FARM QUARRY
Interpretation	FREEDOM CAMPING
Interpretation	FUNCTIONAL NEED
Interpretation	GREENFIELD
Interpretation	GROSS FLOOR AREA
Interpretation	GROUND LEVEL
Interpretation	HABITABLE ROOM
Interpretation	HEALTHCARE AND MEDICAL ACTIVITIES
Interpretation	HEAVY VEHICLE
Interpretation	HEIGHT
Interpretation	HERITAGE FABRIC
Interpretation	HERITAGE PROFESSIONAL
Interpretation	HERITAGE RESOURCE
Interpretation	HISTORIC HERITAGE
Interpretation	HOME BUSINESS
Interpretation	HOMESTAY
Interpretation	INDIGENOUS VEGETATION CLEARANCE
Interpretation	INDUSTRIAL ACTIVITY
Interpretation	INFRASTRUCTURE
Interpretation	INTENSIVE INDOOR PRIMARY PRODUCTION
Interpretation	IWI/PAPATIPU RŪNANGA MANAGEMENT PLAN
Interpretation	LAeq
Interpretation	LAF(max)
Interpretation	LAKE
Interpretation	LAND DISTURBANCE
Interpretation	LARGE SCALE
Interpretation	LAWFULLY ESTABLISHED
Interpretation	MAIN STREET FRONTAGE
Interpretation	MAINTENANCE
Interpretation	MĀORI LAND
Interpretation	MĀORI PURPOSE ACTIVITIES
Interpretation	MINERAL
Interpretation	MINERAL EXPLORATION
Interpretation	MINERAL EXTRACTION
Interpretation	MINERAL EXTRACTION MANAGEMENT PLAN
Interpretation	MINERAL PROSPECTING
Interpretation	MINIMUM LOT SIZE
Interpretation	MINOR RESIDENTIAL UNIT
Interpretation	NATIONAL GRID
Interpretation	NATIONAL GRID SUBDIVISION CORRIDOR
Interpretation	NATIONAL GRID YARD
Interpretation	NATURAL HAZARD MITIGATION ACTIVITIES
Interpretation	NATURAL HAZARD MITIGATION STRUCTURE
Interpretation	NET SITE AREA
Interpretation	NETWORK UTILITY OPERATOR
Interpretation	NOISE

Support The inclusion for telecommunications networks appropriately recognises the important services these networks provide to West Coast communities Retain definition as notified

Interpretation	NOTIONAL BOUNDARY
Interpretation	OFFICIAL SIGN
Interpretation	OPEN SPACE MANAGEMENT PLAN
Interpretation	OPERATIONAL NEED
Interpretation	OUTDOOR LIVING SPACE
Interpretation	OUTSTANDING COASTAL ENVIRONMENT
Interpretation	OVERLAY CHAPTER
Interpretation	PAPAKĀINGA
Interpretation	PAPATIPU RŪNANGA
Interpretation	PARKS FACILITIES
Interpretation	PARKS FURNITURE
Interpretation	POINT STRIP
Interpretation	PORT ACTIVITIES
Interpretation	POUTINI NGĀI TAHU
Interpretation	POUTINI NGĀI TAHU ACTIVITIES
Interpretation	RECREATION ACTIVITY
Interpretation	RECONSTRUCTION
Interpretation	RELOCATED BUILDING
Interpretation	RELOCATION
Interpretation	RENEWABLE ELECTRICITY GENERATION
Interpretation	RENEWABLE ELECTRICITY GENERATION ACTIVITIES
Interpretation	REPOSITIONING
Interpretation	RESEARCH ACTIVITY
Interpretation	RESIDENTIAL ACTIVITY
Interpretation	RESIDENTIAL BUILDING
Interpretation	RESIDENTIAL UNIT
Interpretation	RETAIL ACTIVITY
Interpretation	RETIREMENT VILLAGE
Interpretation	REVERSE SENSITIVITY
Interpretation	RIPARIAN MARGIN
Interpretation	RIVER
Interpretation	ROOT PROTECTION AREA
Interpretation	RURAL INDUSTRY
Interpretation	SENSITIVE ACTIVITY
Interpretation	SHARED PATHWAY
Interpretation	SIGN
Interpretation	SIGNIFICANT ELECTRICITY DISTRIBUTION LINE
Interpretation	SIGNIFICANT NATURAL AREA
Interpretation	SITE
Interpretation	SMALL SCALE
Interpretation	STADIUM ACTIVITY
Interpretation	STORMWATER
Interpretation	STRUCTURE
Interpretation	STRUCTURE PLAN
Interpretation	SUBSTATION (DISTRIBUTION)
Interpretation	SUBSTATION (ZONE)
Interpretation	SUPPORTED RESIDENTIAL ACCOMMODATION
Interpretation	TEMPORARY ACTIVITY
Interpretation	TEMPORARY MILITARY TRAINING ACTIVITY
Interpretation	TRADE RETAIL AND TRADE SUPPLIERS
Interpretation	TRANSMISSION LINES
Interpretation	UNOCCUPIED BUILDING
Interpretation	UPGRADING
Interpretation	URBAN ZONE
Interpretation	VEHICLE CROSSING
Interpretation	VISITOR ACCOMMODATION
Interpretation	WATERBODY
Interpretation	WETLAND

Glossary Section

Abbreviations Section

National Direction Instruments Section

Tangata Whenua Section

PART 2 - DISTRICT WIDE MATTERS Section

Strategic Direction Section

Strategic Direction	STRATEGIC DIRECTION			
Strategic Direction	Strategic Directions Overview			
Strategic Direction	AG			
Strategic Direction	Agriculture			
Strategic Direction	Agriculture Strategic Objectives			
Strategic Direction	AG - O1			
Strategic Direction	AG - O2			
Strategic Direction	CR			
Strategic Direction	Connections and Resilience			
Strategic Direction	Connections and Resilience Strategic Objectives			
Strategic Direction	CR - O1	Support	Provides appropriate high level direction for infrastructure connections and resilience	Retain provision as notified
Strategic Direction	CR - O2	Support	Provides appropriate high level direction for infrastructure connections and resilience	Retain provision as notified
Strategic Direction	CR - O3	Support	Provides appropriate high level direction for infrastructure connections and resilience	Retain provision as notified
Strategic Direction	CR - O4	Support	Provides appropriate high level direction for infrastructure connections and resilience	Retain provision as notified
Strategic Direction	MIN			
Strategic Direction	Mineral Extraction			
Strategic Direction	MIN - O1			
Strategic Direction	MIN - O2			
Strategic Direction	MIN - O3			
Strategic Direction	MIN - O4			
Strategic Direction	MIN - O5			
Strategic Direction	MIN - O6			
Strategic Direction	NENV			
Strategic Direction	Natural Environment			
Strategic Direction	Natural Environment Strategic Objectives			
Strategic Direction	NENV- O1			
Strategic Direction	NENV- O2			
Strategic Direction	NENV - O3	Support	NENV-O3(b) in particular is supported as it recognises that in some instances infrastructure will need to be located in sensitive natural environments	Retain provision as notified
Strategic Direction	NENV - O4			
Strategic Direction	POU			
Strategic Direction	Poutini Ngāi Tahu			
Strategic Direction	Poutini Ngāi Tahu Strategic Objectives			
Strategic Direction	POU - O1			
Strategic Direction	POU - O2			
Strategic Direction	POU - O3			
Strategic Direction	POU - O4			
Strategic Direction	Poutini Ngāi Tahu Strategic Policies			
Strategic Direction	POU - P1			
Strategic Direction	POU - P2			
Strategic Direction	POU - P3			
Strategic Direction	POU - P4			
Strategic Direction	POU - P5			
Strategic Direction	POU - P6			
Strategic Direction	POU - P7			
Strategic Direction	POU - P8			
Strategic Direction	POU - P9			
Strategic Direction	POU - P10			
Strategic Direction	TRM			
Strategic Direction	Tourism			
Strategic Direction	Tourism Strategic Objective			
Strategic Direction	TRM - O1			
Strategic Direction	UFD			

Strategic Direction Strategic Direction	Urban form and development Urban Form and Development Strategic Objective			
Strategic Direction Energy Infrastructure and Transport Section	UFD - O1	Support	Clause 8 of the objective in particular is supported in regard to the provision, use and protection of infrastructure	Retain provision as notified
Energy Infrastructure and Transport Energy Section	Energy Infrastructure and Transport			
Infrastructure Section				
Infrastructure Infrastructure	INF Infrastructure			
			The statement in the fifth paragraph of the overview that zone chapters do not apply to infrastructure managed in the infrastructure chapter is supported. However, by way of example Rule GIZ-R2 in the Industrial Zone chapter includes rules for masts, poles, aerials and antennas. This creates confusion. If this is indeed to apply to private equipment that is not part of a network utility network managed by the infrastructure chapter, the statement should include a statement to this effect to avoid confusion.	Add additional text to the statement in the fifth paragraph as follows: Rules relating to aerials and antennas and their support masts in zone chapters do not apply to equipment installed and/or operated by a network utility operator, or delete any provisions relating to telecommunications equipment from all zone chapters.
Infrastructure Infrastructure Infrastructure	Overview Other relevant Te Tai o Poutini Plan provisions Infrastructure Objectives	Support in part		
Infrastructure	INF - O1	Support	The suite of INF objectives is appropriate in regard to the provision, protection and management of the effects infrastructure	Retain provision as notified
Infrastructure	INF - O2	Support	The suite of INF objectives is appropriate in regard to the provision, protection and management of the effects infrastructure	Retain provision as notified
Infrastructure	INF - O3	Support	The suite of INF objectives is appropriate in regard to the provision, protection and management of the effects infrastructure	Retain provision as notified
Infrastructure	INF - O4	Support	The suite of INF objectives is appropriate in regard to the provision, protection and management of the effects infrastructure	Retain provision as notified
Infrastructure Infrastructure Infrastructure	INF - O5 Infrastructure Policies INF - P1	Support	The suite of INF objectives is appropriate in regard to the provision, protection and management of the effects infrastructure	Retain provision as notified
		Support	Policy properly recognised the benefits of infrastructure. Policy INF-P2 is generally supported except that it is requested that the language in Clause (a) be amended to operational need and functional need to reflect the terms used in the National Planning Standards and the definitions in the Plan.	Retain provision as notified Amend Policy INF-P12(a) as follows: <i><u>(a) Locational, technical and operational constraints operational need and functional need</u></i>
Infrastructure	INF - P2	Support in part		
Infrastructure	INF - P3	Support	Policy properly recognises the need to manage the adverse effects of other activities on infrastructure	Retain provision as notified
Infrastructure Infrastructure	INF - P4 INF - P5	Support	Policy properly recognises the need to adequately service new subdivision and development, including telecommunications	Retain provision as notified
Infrastructure	INF - P6	Support	Policy properly recognises the need to provide flexibility for network utilities to adopt new technologies	Retain provision as notified Amend Note 2 as follows: <i>The installation and operation of telecommunications facilities (such as cabinets, antennas, poles, small cell-units and telecommunications lines) undertaken by a telecommunications facility operator are controlled <u>in some instances</u> by the Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016, separate to Te Tai o Poutini Plan. Te Tai o Poutini Plan applies where these telecommunications facilities <u>are either not covered by the Regulations, are covered but do not meet permitted standards of the Regulations, or are located within the following overlays:</u></i>
Infrastructure	Infrastructure Rules	Oppose in part	Note 2 needs to reflect that the NESTF 2016 does not regulate all new poles and antennas, and that the district plan also applies where regulated equipment does not meet permitted standards Add new permitted activity rules for underground lines and back up electricity generators. Other than where restricted in overlays due to ground disturbance, underground lines should be enabled. Back up generators also need to be provided for to ensure during power outages that critical infrastructure can continue to operate.	
Infrastructure Infrastructure	Permitted Activities INF - R1	Amend		Add new permitted activity rules to allow for underground lines and back up electricity generators

Infrastructure Infrastructure	INF - R2 INF - R3				Amend Rule INF-R4 as follows: <i>Activity Status Permitted</i> <i>Where:</i> 1. <i>The temporary network is operated by a network utility operator;</i> 2. <i>The temporary network activity is:</i> <i>i. For up to a period of 24 months following a national, regional or local state of emergency declaration; or</i> <i>ii. For up to a period of four weeks to provide for additional capacity; and</i> <u>iii. For a period of up to 12 months as part fo construction or re-construction activity; and</u>
Infrastructure Infrastructure Infrastructure	INF - R4 INF - R5 INF - R6	Oppose in part	This rule allows for temporary network utilities for up to 24 months in regard to emergency declarations. Otherwise they are limited to 4 weeks, including for holiday surge capacity. An increased period of 12 months is sought to cater for construction/re-construction activity (e.g. a temporary site may be installed to retain service while an existing facility is moved or needs to be temporarily taken of a building while it is renovated		
Infrastructure Infrastructure	INF - R7 INF - R8	Support Support	The standards in the rule are considered to be workable for telecommunications infrastructure. The rule appropriately provides for customer connections	Retain provision as notified Retain provision as notified	
Infrastructure Infrastructure	INF - R9 INF - R10	Support Support	The rule appropriately provides for overhead lines in rural and industrial zones The rule appropriately provides for telecommunications kiosks	Retain provision as notified Retain provision as notified	Amend Rule INF-R11 as follows:
Infrastructure	INF - R11	Oppose in part	This rule provides for New Small Cell Utility as a permitted activity. However, as this term is undefined it is unclear what activity is provided for. The NESTF provides for small cell units as a permitted activity. However, these are subject to a defined envelope. Rule INF-R11 should adopt the same envelope to provide clarity on what is provided for in the rule.	<i>Activity Status Permitted</i> <i>Where:</i> 1. <i>This meets the performance standards in Rule INF - R1 ; and</i> <u>2. the volume (including any ancillary equipment, but not including any cabling) is not more than 0.11m³.</u> Amend Rule INF R12 as follows:	<i>New telecommunications poles, new antenna attached to poles and new antenna attached to a building not regulated by the NES - TF , or regulated equipment not meeting the permitted standards of the NES-TF</i> 1. <i>This is located within a land transport corridor; and</i> <i>i. The combined height of the pole and antenna does not exceed:</i> <i>a. 15m in a RESZ - Residential Zone, SETZ - Settlement Zone or <u>NCZ Neighbourhood Centre Zone</u> CMUZ—Commercial and Mixed-Use Zone ;</i> <i>b. 20m in <u>a CMUZ - Commercial and Mixed Use Zone other than the NCZ Neighbourhood Centre Zone or an</u> INZ - Industrial Zone; or</i> <i>c. 35m in all other zones.</i> 2. <i>This is located outside a land transport corridor:</i> <i>i. The combined height (network utility) of a telecommunications pole and antenna does not exceed:</i> <i>a. 15m in a RESZ - Residential Zone, <u>NCZ Neighbourhood Centre Zone</u> CMUZ—Commercial and Mixed-Use Zone or SETZ - Settlement Zone;</i> <i>b. 20m in <u>a CMUZ - Commercial and Mixed</u></i>
Infrastructure Infrastructure	INF - R12 Controlled Activities	Oppose in part	This rule covers equipment not regulated by the NESTF. It needs to be extended to also cover equipment that is regulated but does not meet the permitted standards of the NESTF. Otherwise there will be a rule gap for considering this situation as regulated equipment not meeting the NESTF permitted standards then to be assessed under the District Plan. Further to provide more consistency with the standards being sought for similar zones in other distirct plans to better reflect the ability for these zones to absorb the effects of infrastructure, a 20m height limit is sought for commercial zones other than the Neighbourhood Centre Zone, and 25m for Industrial Zones.		
Infrastructure	INF - R13	Support	The additional allowance above the NESTF permitted standards as a controlled activity supports the efficient roll out of telecommunications infrastructure to communities	Retain provision as notified	

Infrastructure	INF - R14	Support	The additional allowance above the NESTF permitted standards as a controlled activity supports the efficient roll out of telecommunications infrastructure to communities	Retain provision as notified
Infrastructure	INF - R15	Support	The additional allowance above the NESTF permitted standards as a controlled activity supports the efficient roll out of telecommunications infrastructure to communities	Retain provision as notified
Infrastructure	Restricted Discretionary Activities			
Infrastructure	INF - R16			
Infrastructure	INF - R17			
Infrastructure	INF - R18			
Infrastructure	INF - R19			
Infrastructure	INF - R20			
Infrastructure	INF - R21			
Infrastructure	INF - R22	Support	Restrcted Discretionary status is considered reasonable for assessing telecommunications kiosks not meeting permitted activity standards. Relevant matters have been included in the matters of discretion	Retain provision as notified
Infrastructure	INF - R23	Support	The matters to which discretion are restricted sets out an appropriate framework for considering restricted discretionary activity applications for telecommunications equipment.	Retain provision as notified
Infrastructure	Discretionary Activities			
Infrastructure	INF - R24			
Infrastructure	INF - R25			
Infrastructure	INF - R26			
Infrastructure	INF - R27			
Infrastructure	Non-complying Activities			
Infrastructure	INF - R28			
Transport Section				
HAZ - Hazards and Risks Section				
HAZ - Hazards and Risks	HAZ - Hazards and Risks	Oppose	There is no specific reference to telecommunications infrastructure in the rules. Therefore it is unclear if this is because telecommunications infrastructure is not regulated by the rules of this section, or is intended to be caught by catch all rules. A permitted activity rule for telecommunications infrastructure in all hazard overlays is requested for the avoidance of doubt.	Add a new rule applying to all hazard overlays that <i>critical infrastructure</i> , or in the alternative telecommunications infrastructure, is a permitted activity in all natural hazard overlays See additional submission points on natural hazards in the HAZ chapter at the end of this table as the templete will not expand out the NH provisions of the HAZ chapter
Contaminated Land Section				
Hazardous Substances Section				
HCV - Historical and Cultural Values Section				
Historic Heritage Section				
Historic Heritage	HH			
Historic Heritage	Historic Heritage			
Historic Heritage	Overview			
Historic Heritage	Other relevant Te Tai o Poutini Plan provisions			
Historic Heritage	Other relevant Statutory Provisions			
Historic Heritage	Historic Heritage Objectives			
Historic Heritage	HH - O1			
Historic Heritage	HH - O2			
Historic Heritage	HH - O3			
Historic Heritage	HH - O4			
Historic Heritage	Historic Heritage Policies			
Historic Heritage	HH - P1			
Historic Heritage	HH - P2			
Historic Heritage	HH - P3			
Historic Heritage	HH - P4			
Historic Heritage	HH - P5			
Historic Heritage	HH - P6			
Historic Heritage	HH - P7			
Historic Heritage	HH - P8			
Historic Heritage	HH - P9			
Historic Heritage	Historic Heritage Rules			

Historic Heritage
Historic Heritage

HH - R1
HH - R2

Amend the rule as follows:

Activity Status Permitted

Where:

1. These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with:

.....

d. Installing fence posts and the replacement of poles for overhead network utility lines provided the area of land

disturbed is limited to what is necessary to maintain an existing fence along its existing alignment and does not involve installation or digging of new post holes; or

e. Maintaining existing underground energy or telecommunications activity assets;

e2. Installing new underground customer connections where the building or item has not be scedueld in regard to archaeology;

f. Maintenance and repair of existing drains within the existing footprint of the drain; or

g. Maintaining roads, tracks, carparks, accessways or paved areas within the footprint or modified ground

compromised by the existing road, track, carpark, accessway or paved area; and

This rule provides for minor earthworks for service connection poles and maintaining existing underground energy assets. To avoid unnecessary consents for minor works, this should be extended to maintaining existing underground telecommunications assets, and provision for new underground customer connections unless the description of the scheduled item in the heritage schedule specifically refers to archaeology. Service connections to heritage buildings support their ongoing use and therefore ongoing upkeep.

Historic Heritage
Historic Heritage
Historic Heritage

HH - R3
Controlled Activities
HH - R4

Oppose

The rule ensures that certain service connections can be provided to heritage buildings, but with control retained over minimising impacts through design.

Retain provision as notified

Historic Heritage
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HH - R5
Restricted Discretionary Activities
HH - R6
HH - R7
HH - R8
Discretionary Activities
HH - R9
HH - R10
HH - R11
Other Methods
HH - M1

Support

Notable Trees Section

Notable Trees
Notable Trees
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Notable Trees
Notable Trees
Notable Trees
Notable Trees
Notable Trees
Notable Trees

TREE
Notable Trees
Overview
Notable Tree Objectives
TREE - O1
TREE - O2
TREE - O3
Notable Tree Policies
TREE - P1
TREE - P2
TREE - P3

The intent of the rule in regard to permitted trimming and pruning of notable trees is supported. However, there is a missing work in clause (c).

Amend clause (c) of the rule as follows:

Support in part

The word "provision" is missing

c. Are necessary for the ongoing provision of infrastructure; or

Notable Trees
Notable Trees
Notable Trees
Notable Trees
Notable Trees
Notable Trees
Notable Trees

TREE - P4
TREE - P5
TREE - P6
Notable Tree Rules
Note:
Permitted Activities
TREE - R1
TREE - R2

Notable Trees	TREE - R3
Notable Trees	Restricted Discretionary Activities
Notable Trees	TREE - R4
Notable Trees	TREE - R5
Notable Trees	TREE - R6
Notable Trees	Discretionary Activities
Notable Trees	TREE - R7
Notable Trees	TREE - R8

Sites and Areas of Significance to Māori Section

Natural Environment Values Section

Ecosystems and Indigenous Biodiversity Section

Ecosystems and Indigenous Biodiversity	ECO
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity
Ecosystems and Indigenous Biodiversity	Overview
Ecosystems and Indigenous Biodiversity	Plantation Forestry
Ecosystems and Indigenous Biodiversity	Strategic Objectives
Ecosystems and Indigenous Biodiversity	Wetlands on the West Coast
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Objectives
Ecosystems and Indigenous Biodiversity	ECO- O1
Ecosystems and Indigenous Biodiversity	ECO- O2
Ecosystems and Indigenous Biodiversity	ECO- O3
Ecosystems and Indigenous Biodiversity	ECO- O4
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Policies
Ecosystems and Indigenous Biodiversity	ECO - P1
Ecosystems and Indigenous Biodiversity	ECO - P2
Ecosystems and Indigenous Biodiversity	ECO - P3
Ecosystems and Indigenous Biodiversity	ECO - P4
Ecosystems and Indigenous Biodiversity	ECO - P5
Ecosystems and Indigenous Biodiversity	ECO - P6
Ecosystems and Indigenous Biodiversity	ECO - P7
Ecosystems and Indigenous Biodiversity	ECO - P8
Ecosystems and Indigenous Biodiversity	ECO - P9
Ecosystems and Indigenous Biodiversity	ECO - P10
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity Rules
Ecosystems and Indigenous Biodiversity	Note:
Ecosystems and Indigenous Biodiversity	Permitted Activities

Amend ECO-R1(3)(ii) as follows:

Ecosystems and Indigenous Biodiversity	ECO - R1	Oppose
Ecosystems and Indigenous Biodiversity	ECO - R2	Support
Ecosystems and Indigenous Biodiversity	Controlled Activities	
Ecosystems and Indigenous Biodiversity	ECO - R3	
Ecosystems and Indigenous Biodiversity	ECO - R4/SUB - R7	
Ecosystems and Indigenous Biodiversity	Restricted Discretionary Activities	
Ecosystems and Indigenous Biodiversity	ECO - R5	
Ecosystems and Indigenous Biodiversity	ECO - R6/SUB - R9	
Ecosystems and Indigenous Biodiversity	Discretionary Activities	
Ecosystems and Indigenous Biodiversity	ECO - R7	
Ecosystems and Indigenous Biodiversity	ECO - R8/SUB - R15	
Ecosystems and Indigenous Biodiversity	Non-complying Activities	
Ecosystems and Indigenous Biodiversity	ECO - R9/SUB - R27	
Ecosystems and Indigenous Biodiversity	ECO - R10	
Ecosystems and Indigenous Biodiversity	ECO - R11	

In regard to indigenous vegetation clearance, ECO-R1(3)(ii) provides for the operation, maintenance and repair of critical infrastructure outside of the Coastal Environment, whereas ECO-R2(1)(ii) provides for operation, maintenance, repair, upgrading and installation of new network utility infrastructure in the Coastal Environment. The scope of the rule in ECO-R1 should be consistent with ECO-R2. The rule recognises the need for infrastructure works in the coastal environment.

ii. The maintenance, operation and repair of lawfully established tracks, fences, structures, buildings, ~~critical infrastructure, network utilities~~, renewable electricity generation activities or natural hazard mitigation activities;
xx. The operation, maintenance, repair, upgrading and installation of new network utility infrastructure;

Retain provision as notified

Natural Features and Landscapes Section

Natural Features and Landscapes	NFL		
Natural Features and Landscapes	Natural Features and Landscapes		
Natural Features and Landscapes	Overview		
Natural Features and Landscapes	Plantation Forestry		
Natural Features and Landscapes	Other relevant Te Tai o Poutini Plan provisions		
Natural Features and Landscapes	Natural Features and Landscapes Objective		
Natural Features and Landscapes	NFL - O1		
Natural Features and Landscapes	Natural Features and Landscapes Policies		
			The policy requirement for infrastructure is that it <i>does not adversely affect</i> the values that contribute to a natural feature or landscape. This language has an 'avoid' connotation. Extensive parts of the plan area are located on Outstanding Natural Landscapes (ONLs). For operational and functional reasons telecommunications infrastructure may need to locate in ONLs (e.g. a need for elevated topography for line of sight). Use of the term <i>maintain</i> is preferred.
			Amend Policy NFL-P2 as follows: <i>Provide for activities within outstanding natural landscapes described in Schedule Five and outstanding natural features described in Schedule Six where they do not adversely affect maintain the values that contribute to a natural feature or landscape being outstanding and are for:</i> <i>a)</i>
Natural Features and Landscapes	NFL - P1	Oppose	
Natural Features and Landscapes	NFL - P2		
			It is appropriate to recognise existing development and infrastructure in Outstanding Natural Landscapes and Features when assessing the impacts of existing uses and new activities on the values that contribute to these areas.
			Retain provision as notified
Natural Features and Landscapes	NFL - P3	Support	
Natural Features and Landscapes	NFL - P4		
Natural Features and Landscapes	NFL - P5		
			Amend Rule NFL-R6 as follows: <i>Activity Status Permitted</i> <i>Where:</i> <i>1. All performance standards for Earthworks Rule EW - R1 are complied with; and</i> <i>2. This is ancillary to:</i> <i>a. An infrastructure activity undertaken by a network utility operator in accordance with the Permitted Activity standards in Infrastructure Rule INF - R7; or</i>
			The exemptions for pole foundations, trenches and trenchless technology for network utilities in EW-R1 is supported which is one of the standards linked this rule. However, it is unclear why clause 2(a) requires all permitted standards in INF-R7 to be met which is the infrastructure upgrading rule. The earthworks enabled by EW-R1 are considered to be independent of the land use activities which are separately controlled.
Natural Features and Landscapes	NFL - P6	Oppose in part	
Natural Features and Landscapes	NFL - P7		
Natural Features and Landscapes	Permitted Activities		
Natural Features and Landscapes	NFL - R1		
Natural Features and Landscapes	NFL - R2		
Natural Features and Landscapes	NFL - R3		
Natural Features and Landscapes	NFL - R4		
Natural Features and Landscapes	NFL - R5		
Natural Features and Landscapes	NFL - R6		
Natural Features and Landscapes	NFL - R7		
			Amend Rule NFL-R8 as follows: <i>Activity Status Permitted</i> <i>Where the structure is:</i> <i>1. A fence; or</i> <i>2. Associated with stock water reticulation including tanks, pipes and water troughs; or</i> <i>3. For parks facilities or parks furniture in any Open Space Zone; or</i> <i>4. For a network utility (including customer connections) in accordance with the Permitted Activity standards for Infrastructure in Rule INF - R7, <u>underground lines or small network utility structures not exceeding 3m in height and 5m² in area</u>; or</i> <i>.....</i>
			Permitted network utilities are limited to customer connections and upgrades in accordance with INF-R7. However, other network utilities such as underground lines and cabinets should also be provided for as these will have very minor impacts on the values and attributes of these areas.
Natural Features and Landscapes	NFL - R8	Oppose in part	
Natural Features and Landscapes	Controlled Activities		
Natural Features and Landscapes	NFL - R9		
Natural Features and Landscapes	NFL - R10		
Natural Features and Landscapes	Restricted Discretionary Activities		
Natural Features and Landscapes	NFL - R11		
Natural Features and Landscapes	NFL - R12		
Natural Features and Landscapes	Discretionary Activities		

Natural Features and Landscapes NFL - R13
 Natural Features and Landscapes NFL - R14
 Natural Features and Landscapes NFL - R15

Public Access Section

Natural Character and Margins of Waterbodies Section

Natural Character and Margins of Waterbodies: NC
 Natural Character and Margins of Waterbodies: Natural Character and Margins of Waterbodies
 Natural Character and Margins of Waterbodies: Overview
 Natural Character and Margins of Waterbodies: Natural Character and the Margins of Waterbodies Objectives
 Natural Character and Margins of Waterbodies: NC - O1
 Natural Character and Margins of Waterbodies: NC - O2

Amend NC-O3 as follows:

*To provide for activities which have a functional need **or operational need** to locate in the margins of lakes, rivers and wetlands in such a way that the impacts on natural character are minimised.*

Natural Character and Margins of Waterbodies: NC - O3
 Natural Character and Margins of Waterbodies: Natural Character and the Margins of Waterbodies Policies
 Natural Character and Margins of Waterbodies: NC - P1
 Natural Character and Margins of Waterbodies: NC - P2
 Natural Character and Margins of Waterbodies: NC - P3
 Natural Character and Margins of Waterbodies: NC - P4
 Natural Character and Margins of Waterbodies: NC - P5
 Natural Character and Margins of Waterbodies: Natural Character and the Margins of Waterbodies Rules
 Natural Character and Margins of Waterbodies: Note:
 Natural Character and Margins of Waterbodies: Permitted Activities

Oppose in part The objective should refer to operational need as well as functional need.

Amend Rule NC-R1 as follows:

Activity Status Permitted
 1. *Where this is outside of any Significant Natural Area identified in Schedule Four, and for:*
 a. *Fence lines; or*
 b. *Maintenance, operation, minor upgrade and repair of network utilities, critical infrastructure or renewable electricity generation activities;*

Clause (b) of the rule limits network utilities and critical infrastructure works in riparian margins to maintenance, operation, minor upgrade or repair. New services may need to be laid in roads which may encroach into riparian margins on bridge approaches for waterway crossings. An exemption for network utilities and critical infrastructure in roads and on bridges is sought.

b1. network utilities and critical infrastructure within legal roads or attached to a bridge; or
 c. *Connections to wastewater, stormwater and reticulated network utility systems; or*

Natural Character and Margins of Waterbodies: NC - R1
 Natural Character and Margins of Waterbodies: NC - R2
 Natural Character and Margins of Waterbodies: NC - R3
 Natural Character and Margins of Waterbodies: Discretionary Activities
 Natural Character and Margins of Waterbodies: NC - R3
 Natural Character and Margins of Waterbodies: NC - R4
 Natural Character and Margins of Waterbodies: NC - R5

Oppose in part

Financial Contributions Section

Subdivision Section

Subdivision SUB
 Subdivision Subdivision
 Subdivision Overview
 Subdivision Subdivision Objectives
 Subdivision SUB - O1

Subdivision SUB - O2
 Subdivision SUB - O3

Support The objective appropriately acknowledges the role infrastructure networks and capacity play in supporting growth Retain provision as notified

Subdivision SUB - O4
 Subdivision SUB - O5
 Subdivision SUB - O6
 Subdivision Subdivision Policies

Support The objective appropriately seeks to ensure that subdivision of land in the future urban zone does not compromise the potential of land to accomodate integrated and serviced development Retain provision as notified

Subdivision	SUB - P1		
Subdivision	SUB - P2		
Subdivision	SUB - P3		
Subdivision	SUB - P4		
			The policy appropriately seeks to avoid subdivision in the future urban zone that requires significant upgrades of infrastructure in advance of integrated development, that compromises efficient provision of infrastructure, or results in reverse sensitivity effects on infrastructure
Subdivision	SUB - P5	Support	Retain provision as notified
Subdivision	SUB - P6		
			The policy appropriately seeks to ensure that residential subdivision below minimum lot sizes do not result in densities that create adverse effects on critical infrastructure
Subdivision	SUB - P7	Support	Retain provision as notified
Subdivision	SUB - P8		
Subdivision	SUB - P9		
Subdivision	Subdivision Rules		
Subdivision	Note:		
Subdivision	Permitted Activities		
Subdivision	SUB - R1		
Subdivision	SUB - R2		
Subdivision	Controlled Activities		
Subdivision	SUB - R3		
Subdivision	SUB - R4		
Subdivision	SUB - R5		
Subdivision	SUB - R6		
Subdivision	SUB - R7/ECO - R4		
Subdivision	SUB - R8		
Subdivision	Restricted Discretionary Activities		
Subdivision	SUB - R9/ECO - R6		
Subdivision	SUB - R10		
Subdivision	SUB - R11		
Subdivision	SUB - R12		
Subdivision	SUB - R13		
Subdivision	Discretionary Activities		
Subdivision	SUB - R14		
Subdivision	SUB - R15/ECO - R8		
Subdivision	SUB - R16		
Subdivision	SUB - R17		
Subdivision	SUB - R18		
Subdivision	SUB - R19		
Subdivision	SUB - R20		
Subdivision	SUB - R21		
Subdivision	SUB - R22		
Subdivision	SUB - R23		
Subdivision	Non-complying Activities		
Subdivision	SUB - R24		
Subdivision	SUB - R25		
Subdivision	SUB - R26		
Subdivision	SUB - R27/ECO - R9		
Subdivision	Prohibited Activities		
Subdivision	SUB - R28		
Subdivision	Subdivision Standards		
Subdivision	SUB - S1		
Subdivision	SUB - S2		
Subdivision	SUB - S3		
Subdivision	SUB - S4		
Subdivision	SUB - S5		
Subdivision	SUB - S6		
Subdivision	SUB - S7		
Subdivision	SUB - S8		
Subdivision	SUB - S9		
Subdivision	SUB - S10		
Subdivision	SUB - S11		

General District Wide Matters Section

Activities on the surface of water Section

Coastal Environment Section

Earthworks Section

Earthworks	EW
Earthworks	Earthworks
Earthworks	Overview
Earthworks	Earthworks Objectives
Earthworks	EW - O1
Earthworks	Earthworks Policies
Earthworks	EW - P1
Earthworks	EW - P2
Earthworks	EW - P3
Earthworks	EW - P4
Earthworks	Earthworks Rules
Earthworks	Note:
Earthworks	Permitted Activities
Earthworks	EW - R1
Earthworks	EW - R2
Earthworks	EW - R3
Earthworks	EW - R4
Earthworks	EW - R5
Earthworks	EW - R6
Earthworks	Restricted Discretionary Activities
Earthworks	EW - R7
Earthworks	EW - R8

Light Section

Noise Section

Signs Section

Temporary Activities Section

PART 3 - AREA-SPECIFIC MATTERS Section

ZONES Section

Open Space and Recreation Zones Section

Natural Open Space Zone Section

Open Space Zone Section

Sport and Active Recreation Zone Section

Commercial and Mixed Use Zones Section

Commercial Zone Section

Mixed Use Zone Section

Neighbourhood Centre Zone Section

Town Centre Zone Section

Industrial Zones Section

General Industrial Zone Section

Light Industrial Zone Rules Section

Residential Zones Section

General Residential Zone Section

Large Lot Residential Zone Section

Support	The exclusions for network utilities in clause 1 of the rule are appropriate and are supported	Retain clause 1 of the rule as notified as notified
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SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA41
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA43
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA47
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA48
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA49
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA52
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA53
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA54
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA55
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA57
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA58
 SCHED7 - SCHEDULE OF HIGH COASTAL NATUF NCA60

SCHED8 - SCHEDULE OF OUTSTANDING COASTAL NATURAL CHARACTER Section

SCHED9 - LAWFULLY ESTABLISHED MINERAL EXTRACTION AND PROCESSING AREAS Section

SCHED10 - PREVIOUSLY MINED LOCATIONS IN THE RURAL AND OPEN SPACE AND RECREATION ZONES Section

Appendices Section

Appendix One: Transport Performance Standards Section

Appendix Two: Recession Planes Section

Appendix Three: Design Guidelines Section

Appendix Four: Accidental Discovery Protocols Section

Appendix Five: Statutory Acknowledgements Section

Appendix Six: Nohoanga Entitlements Section

Appendix Seven: Mineral Extraction Management Plan Requirements Section

Appendix Eight: Community Living Precinct Concept Plans Section

Appendix Nine: Airport Approach Path Overlay Section

Appendix Ten: New Zealand Archaeological Association Sites of Māori Origin Section

HAZ - Hazards and Risks *(included here as template above will not expand out provisions from this chapter)*

Natural Hazards	NH O3	Support	Infrastructure may need to locate in natural hazard areas to support communities, and other activities in natural hazard areas need to ensure they do not result in unacceptable adverse effects on infrastructure.	Retain provision as notified
Natural Hazards	NH O6	Support	Infrastructure may need to locate in natural hazard areas to support communities, and other activities in natural hazard areas need to ensure they do not result in unacceptable adverse effects on infrastructure.	Retain provision as notified
Natural Hazards	NH P3	Support	Infrastructure may need to locate in natural hazard areas to support communities, and other activities in natural hazard areas need to ensure they do not result in unacceptable adverse effects on infrastructure.	Retain provision as notified
Natural Hazards	NH P5	Support	Infrastructure may need to locate in natural hazard areas to support communities, and other activities in natural hazard areas need to ensure they do not result in unacceptable adverse effects on infrastructure.	Retain provision as notified
Natural Hazards	NH P12	Support	Infrastructure may need to locate in natural hazard areas to support communities, and other activities in natural hazard areas need to ensure they do not result in unacceptable adverse effects on infrastructure.	Retain provision as notified