



---

***Centralines Limited (Centralines)***  
***CENTRAL HAWKE'S BAY PROPOSED DISTRICT PLAN***

---

**To:** Central Hawke's Bay District Council  
PO Box 127  
Waipawa 4240

**Sent via email to:** [districtplan@chbdc.govt.nz](mailto:districtplan@chbdc.govt.nz)

**SUBMISSION FROM:** **Centralines Limited ('Centralines')**  
PO Box 59  
Waipukurau 4242

**Address for Service:** The Property Group  
PO Box 2874  
Wellington 6140  
Attention: Karen Williams  
Phone 027 303 8835  
Email [kwilliams@propertygroup.co.nz](mailto:kwilliams@propertygroup.co.nz)

Centralines Limited  
Attention: Stuart Smith  
Email: [stuart.smith@centralines.co.nz](mailto:stuart.smith@centralines.co.nz)

Date 6 August 2021

**SUBMISSION ON THE HAWKE’S BAY DISTRICT PROPOSED DISTRICT PLAN 2021 BY  
CENTRALINES LIMITED**

---

- a) Centralines Limited (‘Centralines’) appreciates the opportunity to provide comments in regard to the Central Hawke’s Bay District Council (‘CHBDC’) notified Proposed District Plan (‘PDP’).
- b) By way of background, Centralines submitted on the draft District Plan consultation in 2019 and was actively involved in the development of the Central Hawke's Bay Three Towns' Integrated Spatial Plan (ISP) 2020-2050.
- c) The reasons for Centralines submission are set out in the attached schedule (Schedule 1) and more detail provided in the attached table (Table 1). In summary, this submission seeks to ensure recognition, protection and continued access to existing assets, enabling provision for new infrastructure, and that inappropriate development in, around and close to our assets is avoided. Centralines has outlined what we support and where we request changes to the objectives, policies, rules, standards and definitions.
- d) By providing this feedback, it is the intention that the coverage of matters, directly or indirectly, pertaining to Centralines infrastructure operation and development in the next iteration of the Central Hawke’s Bay District Plan are at an appropriate level – and furthermore, that such coverage is enabling for security of supply of the district’s electricity supply network.
- e) Centralines comments are focused on key matters of concern. Centralines reserves the right to comment further on objectives, policies and rules as the District Plan develops.
- f) Centralines wishes to be heard in support of this submission.
- g) If others make a similar submission, Centralines would be prepared to consider presenting a joint case at any hearing.
- h) Centralines could not gain an advantage in trade competition through this submission.

## Schedule 1 – Submission by Centralines

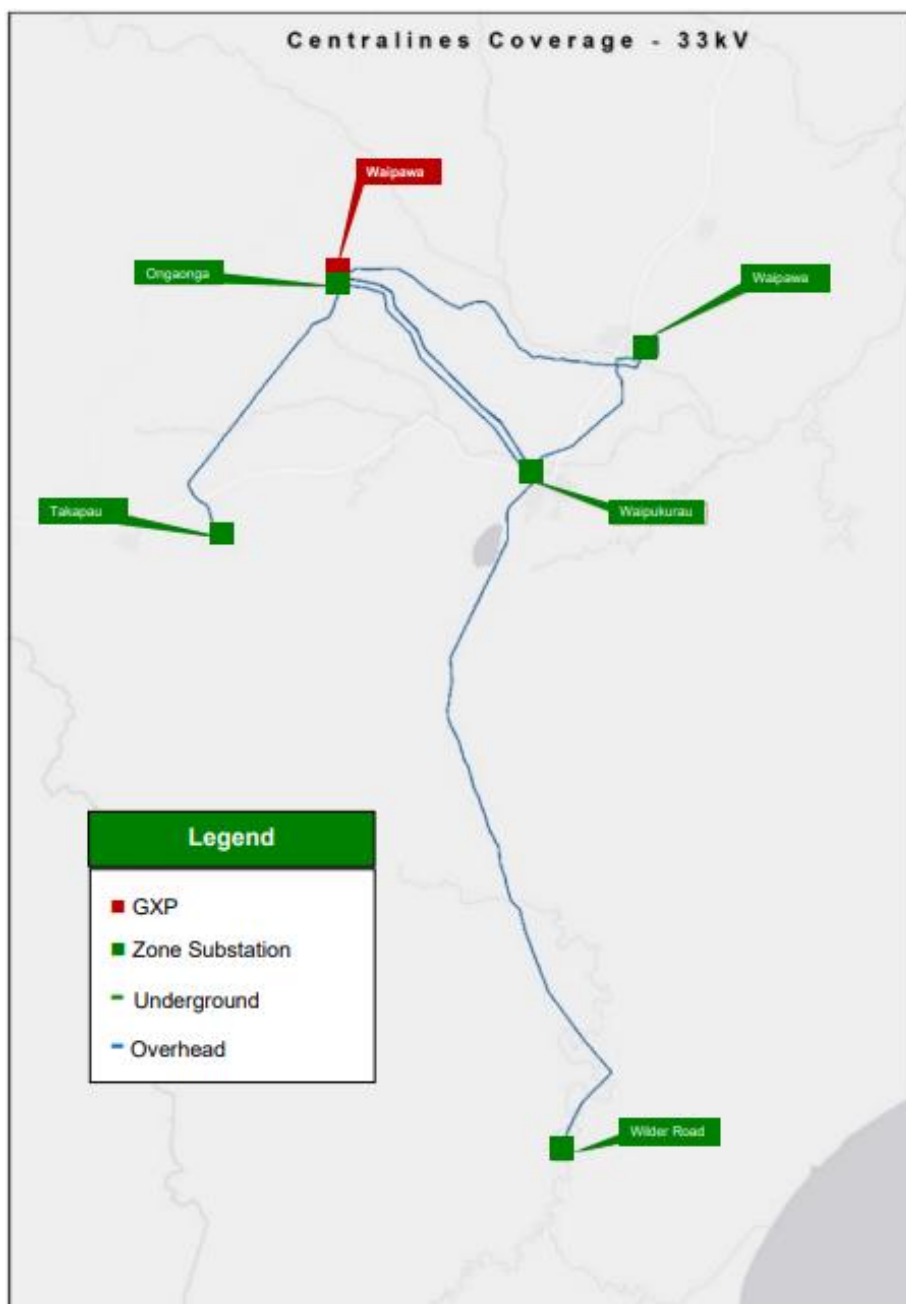
### REASON FOR CENTRALINES SUBMISSION

#### 1 Background: Centralines and its Submission

---

- 1.1 This submission has been prepared on behalf of Centralines Limited (**Centralines**). Centralines is one of 27 distribution companies in New Zealand. Centralines network distributes electricity to customers across the Central Hawke’s Bay region, supplying approximately 8,800 connection points.
- 1.2 Centralines is responsible for distributing electricity from Transpower’s national grid to electricity consumers. Electricity distribution businesses (EDBs) are critical infrastructure providers, partnering with their communities to support people, business and economic growth. EDBs (such as Centralines) are the companies that operate the electricity distribution networks that sit between the national grid and electricity consumers, businesses and households.
- 1.3 Centralines has a large network of electricity distribution assets within the district and therefore has an interest in the Proposed District Plan (**PDP**). In particular, Centralines is interested in the approach Council intends to take on the management of network utilities in the PDP. The existing electricity distribution network needs to be operated, repaired, maintained and upgraded, and when required new electricity distribution network infrastructure needs to be installed.
- 1.4 Currently, the Centralines electricity distribution network is approximately 1,812km in length. Centralines own and operate all electricity distribution infrastructure in the Central Hawke’s Bay District. Centralines assets include a network of electricity distribution substations; overhead lines; underground cables; transformers, switchgear and other distribution equipment. Due to the rural location of many of the electricity assets and the high cost of undergrounding electricity distribution infrastructure in rural areas, only 6.8% of Centralines infrastructure is underground.
- 1.5 Centralines is a "Lifeline Utility" as described in Part B of Schedule 1 of the Civil Defence Emergency Management Act 2002, as we are an entity that distributes electricity through a network. Our networks are also recognised as “Strategic Infrastructure” within the Hawke’s Bay Regional Policy Statement (‘HBRPS’).
- 1.6 Centralines is committed in its regulatory obligation to provide consumers with an effective, safe, and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities and industry.

1.7 Centralines own and operates critical<sup>1</sup> high voltage lines (11kV – 33kV) across the Central Hawke’s Bay District (see the Centralines Sub Transmission image below). Electricity supply is provided to Centralines predominantly at 33kV from a single Transpower grid exit point (GXP) at OngaOnga (known a Transpower’s Waipawa GXP) and is connected by Centralines’ sub-transmission network to zone substations. At zone substations, the voltage is converted to 11kV for distribution. Distribution transformers throughout the network then reduce the voltage to 400V for end use.



**Figure 1.** Centralines Coverage – 33kv Sub-Transmission and Point of Supply Network

<sup>1</sup> Critical lines are high voltage lines that supply essential public services such as the hospital, civil defence facilities or Lifeline sites; or supply large industrial or commercial electricity consumers; or supply 1000 or more consumers; or are lines that are difficult to replace with an alternative electricity supply if they are compromised.

- 1.8 In addition to ensuring the PDP enables the ongoing operation, maintenance, and expansion of the distribution network, Centralines has an interest in ensuring the PDP adequately enables renewable energy generation, including but not limited to, energy generated through large-scale ground mounted solar PV systems.
- 1.9 Beyond energy interests, Centralines also owns property in various parts of the district, including within the proposed General Industrial Zone and Commercial Zones, and therefore some submission points reflect their interest in this regard.
- 1.10 The purpose of the PDP is to assist the Council to carry out its functions in order to achieve the purpose in Part 2 of the RMA.
- 1.11 Centralines electricity distribution infrastructure supports the sustainable management and efficient use of natural and physical resources as promoted in Part 2 of the RMA.
- 1.12 A fundamental part of enabling people and communities to provide for their social, economic and cultural wellbeing under section 5 of the RMA is the provision of a secure and efficient supply of electricity.
- 1.13 The benefits of Centralines electricity infrastructure in achieving sustainable management are also enshrined in the RMA through sections 7(b) and 7(ba); in achieving the purpose of the RMA, particular regard is to be given to "the efficient use and development of natural and physical resources" and "the efficiency of the end use of energy".

---

## **2 Submission: Overview**

---

- 2.1 The HBRPS recognises that some infrastructure is strategically important (including Centralines electricity distribution network) and that the social, economic, cultural and environmental benefits of such infrastructure are recognised and protected. It is therefore appropriate, given the local and regional significance of Centralines network within the district, that its management is comprehensively and appropriately addressed in the PDP.
- 2.2 This feedback has been prepared at a level applicable to the nature and scope of the notified PDP. In particular, Centralines comments have been provided associating how Centralines network and business interests relate to the proposed regulatory settings of the PDP.
- 2.3 Notwithstanding the previous feedback provided to CHBDC by Centralines, the comprehensive District Plan review is very important for network utility operators – such as Centralines – as land use and subdivision development activities proposed throughout the district will often instigate customer driven network utility upgrading and development. Therefore, Centralines feedback is in the context of network utility provisions being appropriately set in the PDP.
- 2.4 In this regard, the importance of the functional, operational, technical and locational requirements of network utilities needs to be recognised throughout the PDP. Network Utilities are often required to be located within certain areas / environments to maintain their

functional, operational, technical and locational needs to service communities.

- 2.5 Electricity distribution lines at times need to cross rivers and streams and need to be located everywhere a customer chooses to locate including in overlays (sometimes in areas such as Outstanding Natural Areas and Special Amenity Landscapes) and areas subject to contaminated land and natural hazards.
- 2.6 A reliable and constant energy supply is critical to sustaining the regional economy, population and way of life. Demand for energy is constantly increasing. Centralines faces an increasing number of constraints, in terms of providing a secure and reliable supply of energy to meet the increasing demand and population growth.
- 2.7 The activities of EDBs can broadly be described as:
- Operating existing infrastructure by conveying electricity at specified voltage and current carrying capacity.
  - Maintaining existing infrastructure by replacing or repairing various components (including support structures).
  - Modifying the size, location and/or composition of various components (including support structures).
  - Upgrading existing infrastructure by modifying the size, location and/or composition of various components (including support structures); upgrading the operational voltage; adding various components (including conductors and insulators); vegetation and ground disturbance; access formation and use; and, using machinery.
  - Construction of new infrastructure by erecting, installing, fixing and laying components; excavations (including trenching); vegetation disturbance; and, using machinery.
  - Decommissioning redundant infrastructure by deconstruction, demolishing and removal of components; ground and vegetation disturbance; and, using machinery.
  - Vegetation trimming pursuant to the Electricity (Hazards from Trees) Regulations 2003 and felling.
  - Ground disturbance.
  - Access formation and use; and
  - Development of new technologies (such as solar, EV chargers and batteries)
- 2.8 In addition to ensuring the PDP provisions adequately provide for and enable Centralines to operate, maintain, and expand its electricity distribution network, Centralines has also reviewed and made comment on provisions relevant to Renewable Energy Generation. In this regard, Centralines has an interest in, and supports, renewable energy; with a particular interest in provisions that will enable ground mounted solar PV systems.
- 2.9 Beyond these matters, Centralines is a landowner of a number of properties throughout the Central Hawke's Bay district. Some of these sites are located in the proposed General Industrial Zone, and others within the proposed Commercial Zone. Centralines submission makes comments on these provisions, and related zoning of land, where relevant to their interests. More specifically, Centralines supports the proposed zoning of the General Industrial Zone, and Commercial Zone insofar as they relate to their landholdings, and in

particular, supports the zoning of land at 2 Peel Street and 21 Herbert Street, Waipukurau.

- 2.10 In regard to general development zone provisions across the PDP, Centralines notes that the PDP does not provide a permitted activity rule for the construction of buildings and structures, subject to compliance with standards. In this regard, the PDP ties compliance with the standards to 'activities', but not the actual physical construction of buildings and structures. Centralines seeks that a permitted activity rule be introduced throughout the PDP zones, which explicitly provides for the construction of buildings and structures, subject to compliance with relevant standards. Otherwise, there is a risk that this would inadvertently default to a Discretionary Activity, being a matter that is not otherwise provided for.
- 2.11 Centralines also seeks a small change across the PDP, to note that where reference is made to regulations, such as the Electricity (Hazards from Trees) Regulations 2003, that the applicable rule applies also to any updated version of that regulation.
- 2.12 Overall, Centralines has reviewed the PDP – and consequently has provided specific comment in relation to the proposed objectives, policies, rules and performance standards. Centralines has adopted a submission format that identifies a specific provision, indicative level of support, and makes a subsequent statement on the reasoning behind the level of support and desired outcome.
- 2.13 On the whole, Centralines is very supportive of the notified PDP. Notwithstanding this, Centralines submits that some further refinement is required to the PDP to ensure that the document is effectively implemented and understood; as well as to enhance particular provisions in order to provide for the importance of electricity infrastructure (as provided in Part 2 of the RMA).
- 2.14 The reasons for these changes and the specific relief sought by Centralines to address its concerns are set out in **Table 1** below. If the specific relief (proposed wording amendments) is not accepted by Council, Centralines alternatively requests that appropriate, alternative, or other consequential amendments be made to the provisions to give effect to the concerns raised by Centralines.
- 2.15 Centralines would like to take this opportunity to acknowledge the District Plan Review Team adopting feedback in the pre-consultation stages of the PDP. The overall content of the PDP provisions are well considered, robust, and more importantly reflect the appropriate context for the safe and secure supply of the electricity distribution network.

Signature for and on behalf of Centralines Limited:



.....

Karen Williams  
027 303 8835

[kwilliams@propertygroup.co.nz](mailto:kwilliams@propertygroup.co.nz)

**TABLE 1 – DETAILED SUBMISSION POINTS AND RELIEF SOUGHT**

SECTION OF PLAN	SPECIFIC PROVISION	SUPPORT/SUPPORT IN PART/OPPOSE	REASON FOR SUBMISSION	RELIEF SOUGHT Text to add shown as <u>underlined</u> Text to delete shown as <del>strikethrough</del>
<b>Part 1 – Interpretation - Definitions</b>				
<b>Part 1 - Definitions</b>	<b>BUILDING:</b> Means a temporary or permanent movable or immovable physical construction that is:  <i>partially or fully roofed; and fixed or located on or in land; but excludes any motorised vehicle or other mode of transport that could be moved under its own power.</i>	Support in part	Power poles, support structures and mast poles are not buildings – yet based on the definition there is the potential for such structures to be inappropriately captured by the definition.  It is acknowledged that the Building definition has been taken from the NPS; however, Centralines consider that a distinction or reference to the Building Act should be provided for clarity and efficiency.	Please amend the definition to exclude power poles, support structures and mast poles from the definition of a building as per section 9(a), (ab), (ac) of the Building Act 2004.
	<b>LINES:</b> has the same meaning as in section 5 of the Telecommunications Act 2001 and section 2 of the Electricity Act 1992 (as set out below) <i>a. means a wire or a conductor of any other kind (including a fibre optic cable) used or intended to be used for the transmission or reception of signs, signals, impulses,</i>	Oppose	Centralines respectfully opposes the definition as it does not clearly reference the meaning of “line” as per the Electricity Act 1992 – and hence is ambiguous in its meaning, and therefore its interpretation.  Centralines seeks amendment to include the Electricity Act 1992 more explicitly.	Replace the definition with the following:  <u><b>LINES: means line as defined in Section 5 of the Telecommunications Act 2001: means a wire or a conductor of any other kind (including a fibre optic cable) used or intended to be used for the transmission or reception of</b></u>



	<p>writing, images, sounds, instruction, information, or intelligence of any nature by means of any electromagnetic system; and</p> <p>b. includes—</p> <p>i. any pole, insulator, casing, fixture, tunnel, or other equipment or material used or intended to be used for supporting, enclosing, surrounding, or protecting any of those wires or conductors; and</p> <p>ii. any part of a line</p>			<p><u>signs, signals, impulses, writing, images, sounds, instruction, information, or intelligence of any nature by means of any electromagnetic system; and</u></p> <p><u>Includes—</u></p> <p>a) <u>any pole, insulator, casing, fixture, tunnel, or other equipment or material used or intended to be used for supporting, enclosing, surrounding, or protecting any of those wires or conductors; and</u></p> <p>b) <u>any part of a line;</u></p> <p><u>and means line as defined in section 2 of the <b>Electricity Act 1992:</b></u></p> <p>a) <u>means works that are used or intended to be used for the conveyance of electricity.</u></p>
--	--	--	--	---

	<p><b>MAINTENANCE AND REPAIR</b> to keep in existing order, to prevent loss or deterioration, or to restore to working order. Does not include extending, replacing, removing or demolishing a structure, or any substantive change to the form, orientation, or outline of the structure.</p> <p><b>Specifically in relation to network utilities, 'maintenance' means:</b> any replacement, repair or renewal work or activity necessary</p> <p>...</p>	Support	Centralines supports this definition, and in particular notes that the maintenance of electricity distribution network equipment is often required as a result of equipment reaching its end of life – and hence will be required to be <i>replaced</i> . Centralines notes that the definition accurately reflects this operational reality.	Retain as notified.
	<p><b>POLE:</b> pole, mast, lattice tower, or similar structure, of a kind that is able to be used (with or without modification) to support antennas.</p>	Support	Centralines supports the definition of POLE as it provides for structures to support the distribution and transmission of electricity. Centralines notes that the definition may have originated from a telecommunication perspective but does not consider that the definition as drafted prevents use in the electricity context.	Retain as notified.
<b>Part 2 – Strategic Direction</b>				
<b>Part 2 – Strategic Direction</b>	<b>Strategic Directions</b>	Support in part	<p>Centralines generally supports the Strategic Direction chapter and associated Objectives and Policies.</p> <p>Notwithstanding the above Centralines considers that the Strategic Directions, as drafted, do not specifically:</p> <ul style="list-style-type: none"> <li>○ Recognise the importance of infrastructure in servicing the needs of the community and</li> </ul>	<p>Retain objectives and policies, and include additional objectives/policies that are specific to infrastructure and renewable energy generation – for example:</p> <ul style="list-style-type: none"> <li>● <i>“The important</i></li> </ul>

			<p>protecting its functional/operational requirements.</p> <ul style="list-style-type: none"> <li>○ Enable the development, upgrade, maintenance, and operation of the infrastructure network(s) to accommodate growth.</li> <li>○ Promote renewable energy generation and utilisation</li> </ul>	<p><i>infrastructure needs of the community are fulfilled, and their operation is protected”.</i></p> <ul style="list-style-type: none"> <li>● <i>“The development, upgrade, maintenance, and operation of strategic infrastructure is enabled in a way that minimises adverse effects, while having regard to the practical constraints and the logistical and technical practicalities associated with significant infrastructure.”</i></li> <li>● <i>“There is reduced reliance on non-renewable sources of energy, increased use of renewable sources of energy and greater energy conservation.”</i></li> </ul>
<b>Part 2 - Network Utilities Objectives and Policies</b>				
<b>Part 2 - NU – Network Utilities</b>	Introduction- Preamble	Support	Centralines consider it important that key messages are presented clearly and consistently in the PDP. In this regard, Centralines consider that comments relating to infrastructure provision are presented fairly and reasonably in the preamble to the INF – Infrastructure section of the PDP.	Retain as notified

	<p><b>NU-01</b></p> <p><i>Recognise and provide for safe, effective, efficient and resilient network utilities throughout the District that provide essential and secure services, including in emergencies, that enable people and communities to provide for their health, safety and wellbeing.</i></p>	Support	Centralines support the wording of NU-01 as it clearly acknowledges Centralines role as a “Lifeline Utility” provider.	Retain as notified
	<p><b>NU-02</b></p> <p><i>The adverse effects of network utilities on the environment are avoided, remedied or mitigated, while recognising the functional and operational needs of network utilities (including those associated with their scale, design and locational requirements).</i></p>	Support	Centralines support the wording of NU-02 as it appropriately recognises the balance between managing effects of network utilities, while also recognising that this infrastructure has specific operational and functional requirements.	Retain as notified

	<p><b>NU-03</b></p> <p><i>The safety, maintenance, upgrade or development of network utilities is not compromised by incompatible subdivision, land use or development, including the potential for reverse sensitivity effects.</i></p>	Support	<p>Centralines support the intent behind NU-03 as it will ensure that development around infrastructure manages any potential reverse sensitivity effects, as well as to direct rules and development standards that are enabling to the development and operation of the local electricity distribution network.</p>	Retain as notified
	<p><b>NU-P1</b></p> <p><i>Recognise the national, regional and local importance and benefits of network utilities, including as lifeline utilities during an emergency, by:</i></p> <ol style="list-style-type: none"> <li><i>1 enabling the operation, maintenance, repair, minor upgrade or removal of network utilities throughout the District;</i></li> <li><i>2 providing for upgrades to, and the development of new, network utilities;</i></li> <li><i>3 providing flexibility for network utilities to adopt new technologies that improve access to and efficient use of networks and services, allow for re-use of redundant services or structures, increase resilience,</i></li> </ol>	Support	<p>Centralines support the wording used for Policy NU- P1 as it clearly acknowledges Centralines electricity transmission function as it supplies the local network – both through enabling upgrades and maintenance, as well as network expansion to accommodate the needs of the community. Centralines also supports the explicit recognition of new technologies within this context.</p>	Retain as notified

	<p><i>safety or reliability, or result in environmental benefits and enhancements; and</i></p> <p><i>4 recognising the functional and operational needs of network utilities.</i></p>			
	<p><b>NU-P2</b>  <i>Avoid adverse effects of upgrades to, and the development of new, network utilities on the values and attributes of areas identified in the District Plan as:</i></p> <ol style="list-style-type: none"> <li><i>1 Historical Heritage Items (in HH-SCHED2) and Notable Trees (in TREE-SCHED4);</i></li> <li><i>2 Wāhi Tapu, Wāhi Taonga and Sites and Areas of Significance to Māori (in SASM-SCHED3);</i></li> <li><i>3 Significant Natural Areas (in ECO-SCHED5); and</i></li> <li><i>4 Outstanding Natural Features and Landscapes (in NFL-SCHED6);</i></li> </ol> <p><i>while recognising the extent to which adverse effects can be avoided, may be constrained by a network utility's functional or operational needs.</i></p>	<p>Support in part</p>	<p>Centralines acknowledge the intent of this policy, although it is considered that the term “avoid” is too strong. As the electricity distribution network represents linear infrastructure (as does most other network utility infrastructure), the functional need for the design (line route) of a new section of line often has a functional need to be located through more sensitive environments.</p> <p>Amendments are sought.</p>	<p>Centralines seek that Policy NU-P2 is retained except to the extent indicated as follows:</p> <p><u><i>Avoid Manage</i></u>  <i>adverse effects of upgrades to, and the development of new, network utilities on the values and attributes of areas identified in the District Plan as:</i></p> <ol style="list-style-type: none"> <li><i>1 Historical Heritage Items (in HH-SCHED2) and Notable Trees (in TREE-SCHED4);</i></li> <li><i>2 Wāhi Tapu, Wāhi Taonga and Sites and Areas of Significance to Māori (in SASM-SCHED3);</i></li> <li><i>3 Significant Natural Areas (in ECO-SCHED5); and</i></li> <li><i>4 Outstanding Natural Features and Landscapes (in NFL-SCHED6);</i></li> </ol> <p><i>while recognising the extent to which adverse effects can be avoided, may be constrained</i></p>

				<i>by a network utility's functional or operational needs.</i>
	<p><b>NU-P3</b>  <i>Avoid significant adverse effects and remedy or mitigate other adverse effects of upgrades to, and the development of new, network utilities on the values and attributes of areas identified in the District Plan as:</i></p> <ol style="list-style-type: none"> <li>1 <i>High Natural Character Areas (in CE-SCHED7);</i>  <i>and</i></li> <li>2 <i>Significant Amenity Features (in NFL-SCHED6)</i></li> </ol>	Support in part	<p>Centralines acknowledge the intent of this policy, although it is considered that the term “avoid” is too strong without provision of a qualifying statement. As the electricity distribution network represents linear infrastructure (as does most other network utility infrastructure), the functional need for the design (line route) of a new section of line often has a functional need to be located through more sensitive environments.</p> <p>Amendments are sought.</p>	<p>Centralines seek that Policy NU-P3 is amended as follows:</p> <p><i>Avoid significant adverse effects and remedy or mitigate other adverse effects of upgrades to, and the development of new, network utilities on the values and attributes of areas identified in the District Plan as:</i></p> <ol style="list-style-type: none"> <li>1 <i>High Natural Character Areas (in CE-SCHED7); and</i></li> <li>2 <i>Significant Amenity Features (in NFL-SCHED6)</i></li> </ol> <p><u><i>unless it can be demonstrated that:</i></u></p> <ol style="list-style-type: none"> <li>a) <u><i>There is an operational need or functional need that means the infrastructure's location cannot be avoided, and there are no reasonable alternatives;</i></u></li> <li>b) <u><i>The design and location of the infrastructure is subordinate to and does not compromise the identified characteristics and values of the High Natural Character Area described in CE-</i></u></li> </ol>

				<p><u>SCHED7 – or the Significant Amenity Features described in NFL-SCHED6:</u></p> <p><u>The natural components of the High Natural Character Area or Special Amenity Feature will continue to dominate over the influence of human activity.</u></p>
	<p><b>NU-P4</b>  <i>Manage the effects of network utilities on the environment by:</i></p> <ol style="list-style-type: none"> <li>1 <i>avoiding, remedying or mitigating adverse effects on:</i> <ol style="list-style-type: none"> <li>a) <i>natural and physical resources;</i></li> <li>b) <i>amenity values, including from shading, visual dominance, noise, vibration, light spill, traffic and access, dust nuisance;</i></li> <li>c) <i>the safe and efficient operation of other network utilities, including effects on electricity transmission and the National Grid, gas transmission</i></li> </ol> </li> </ol>	<p>Support in part</p>	<p>Centralines acknowledges and supports the intent of this policy but considers that its wording requires further refinement to adequately reflect the operational requirements of Centralines.</p> <p>In this regard, Centralines wish to raise a disconnect within the PDP whereby the importance of both electricity distribution and transmission are recognised in the NU chapter preamble – and yet NU-P4 only specifies the transmission of electricity. Centralines accordingly seeks an edit to the policy to make specific reference to effects on the electricity distribution network.</p> <p>Further it this, Centralines considers that the policy direction as drafted, which seeks a systematic replacement of overhead lines to underground cables, oversimplifies the reality of such an undertaking. Undergrounding across the distribution (11kV and 400V) networks is undertaken when appropriate as part of Centralines’ Lifecycle Asset Management Process. Due to the rural location of many of the electricity assets and the high cost of undergrounding electricity distribution infrastructure in rural areas, only 6.8% of Centralines infrastructure is underground. It is not feasible for Centralines to retrospectively underground this infrastructure in the zones outlined in NU-P4.</p>	<p>Centralines seek that Policy NU-P4 is amended as follows:</p> <p><i>Manage the effects of network utilities on the environment by:</i></p> <ol style="list-style-type: none"> <li>1 <i>avoiding, remedying or mitigating adverse effects on:</i> <ol style="list-style-type: none"> <li>a) <i>natural and physical resources;</i></li> <li>b) <i>amenity values, including from shading, visual dominance, noise, vibration, light spill, traffic and access, dust nuisance;</i></li> <li>c) <i>the safe and efficient operation of other network utilities, including effects on electricity <u>distribution and transmission networks</u> and the National Grid, gas</i></li> </ol> </li> </ol>



	<p><i>pipelines, road and rail networks, and infrastructural service networks;</i></p> <p><i>d) the health, well-being and safety of people and communities, including from exposure to radio-frequency fields and electric and magnetic fields, and by posing a significant risk or exacerbating an existing risk of natural hazards;</i></p> <p><i>2 requiring compliance with recognised standards and guidelines for the potential adverse effects of noise, vibration, radiofrequency fields and electric and magnetic fields;</i></p> <p><i>3 encouraging the progressive undergrounding of appropriate network utilities in new areas of development within the General Residential, Rural Lifestyle, Large Lot Residential and Settlement Zones and the systematic replacement of existing</i></p>		<p>Amendments are sought.</p>	<p><i>transmission pipelines, road and rail networks, and infrastructural service networks;</i></p> <p><i>d) the health, well-being and safety of people and communities, including from exposure to radio-frequency fields and electric and magnetic fields, and by posing a significant risk or exacerbating an existing risk of natural hazards;</i></p> <p><i>2 requiring compliance with recognised standards and guidelines for the potential adverse effects of noise, vibration, radiofrequency fields and electric and magnetic fields;</i></p> <p><i>3 encouraging the progressive undergrounding of appropriate network utilities in new areas of development within the General Residential, Rural Lifestyle, Large Lot Residential and Settlement Zones <del>and the systematic replacement of existing overhead services with</del></i></p>
--	--	--	-------------------------------	---

	<p><i>overhead services with underground reticulation or the upgrading of existing overhead services within these areas, where this is technically and commercially viable;</i></p> <p><i>4 encouraging the co-siting and sharing of masts, facilities, utility corridors and other innovative solutions within residential environments and roads, where technically feasible and practicable; and</i></p> <p><i>5 encouraging the removal of redundant and superseded network utility facilities.</i></p>			<p><del><i>underground reticulation or the upgrading of existing overhead services within these areas, where this is technically and commercially viable;</i></del></p> <p><i>4 encouraging the co-siting and sharing of masts, facilities, utility corridors and other innovative solutions within residential environments and roads, where technically feasible and practicable; and</i></p> <p><i>5 encouraging the removal of redundant and superseded network utility facilities.</i></p>
	<p><b>NU-P5</b> <i>To protect network utilities from the adverse effects of subdivision, use and development that may constrain or compromise the safe, effective, secure and efficient ...</i></p>	<p>Support</p>	<p>Centralines supports this policy, which seeks to manage reverse sensitivity effects on network utilities.</p> <p>Centralines infrastructure provides a critical supply of electricity across the district. Policy NU-P5 provides an appropriate level of security in regard to mitigating the actual and potential adverse effects on this strategic infrastructure.</p> <p>In particular, Centralines supports NU-P5(1), (7), and (8).</p>	<p>Retain as notified</p>

**Part 2 – Network Utilities  
Rules and Standards**

	<b>NU-R1</b> - Operation, maintenance, replacement, and removal of existing network utilities (that are not regulated by an NES)	Support	Centralines supports this rule – although notes that some changes are sought to the standards referenced within.	Retain as notified.
	<b>NU-R2</b> - Minor upgrading of existing network utilities <b>NU-R2(1)</b> ...	Support in part	Centralines supports this rule in part – noting that the degree of specificity appears to replace the need for a definition as to what constitutes “minor upgrade” in the PDP. However, there are several small amendments that Centralines seeks to make this rule more workable from an operational and practical perspective.  The first is to include an additional permitted activity standard ahead of the existing NU-R2(1)(a), which notes that minor upgrading of existing utilities is enabled for all network utilities in existence at the date of the PDP being notified provided non-compliance with the rules relating to the height, diameter or land area occupied, is not exceeded by more than 10%. This would clearly provide for existing operations. If this cannot be met, then the rule would then flow to what is contained within NU-R2(1)(a).	Amendments  New Permitted Activity standard:  <u>(...) All network utilities in existence at the date of public notification of the Hastings District Plan provided non-compliance with the rules relating to the height, diameter or land area occupied, is not exceeded by more than 10%; or</u>  ...
	iii. <i>The diameter of a replacement conductor or line must not exceed the diameter of the replaced conductor or line, or 50mm, whichever is the greater.</i>	Support in Part	Centralines can confirm their satisfaction on having replacement conductors having a 50mm diameter width provided this relates to overhead conductors/lines and not underground which may be significantly larger due to the electrical insulation and mechanical protection sheathing. Notwithstanding the above, a minor drafting amendment is sought to the standard for clarity.	The following change is sought to NU-R2(1)(a)(iii):  iii. <i>The diameter of a <u>single replacement overhead</u> conductor or line must not exceed the diameter of the replaced conductor or line or 50mm, whichever is the</i>

				greater.
	<p>v. Any pole that replaces an existing pole must not:</p> <p>a) have a diameter or width that is twice that of the replaced pole at its widest point; or</p> <p>b) exceed three times the width of the replacement pole at its widest point, where a single pole is replaced with a pi pole; and</p> <p>c) have a height exceeding the height of the replaced pole or the relevant maximum height limit for above ground structures under NU-S3, whichever is the greater; and</p> <p>d) be replaced with a tower.</p>	Support in Part	<p>Centralines seeks clarification as to whether the rule is referring to a 'bi-pole structure', not 'pi-pole'?</p> <p>Centralines is also uncertain as to why a limit of 3x pole widths is being applied in regard to (NU-R2(v)(b)).</p> <p>Centralines network designers apply a number of variables in regard to support structures so as to achieve the most effective, safe and secure outcomes from an operational perspective.</p> <p>Centralines do not support nominal design restrictions being presented in the PDP as such matters are best provided for under NZECP 34 and the applicable engineering parameters.</p> <p>Pole structures are used for a number of reasons and are significantly influenced by the type of equipment to be supported by the pole structure, as well as mechanical load bearing calculations. In some instances, a width greater than 3x the single pole width is required. Technical flexibility is sought by Centralines in regard to technical considerations and the corresponding infrastructure standards of the PDP. Standard pole structure designs have pole centres at 2.4m, 3.0m, or 4.2m – consequently a 4.2m pole structure width is requested.</p>	<p>The following change is sought to NU-R2(1)(v):</p> <p><i>v. Any pole that replaces an existing pole must not:</i></p> <p>...</p> <p><i>b) exceed three times the width of the replacement pole at its widest point, <u>or alternatively where a single pole is replaced with a pi-bi pole structure, 4.2m as taken from the pole centres at its widest point; and</u></i></p>

	<p>viii. <i>Up to two additional electricity poles may be installed in existing networks where necessary to achieve conductor clearances required by NZCEP 34:2001.</i></p>	Oppose	<p>Centralines are uncertain as to the two (2) pole restriction for this condition. A 2-pole standard is considered from an operational perspective to be an arbitrary restriction whereby any given terrain, in conjunction with NZECP34, should dictate the number of poles required. In all instances Centralines will apply design efficiency in regard to line upgrades – whether it is 1 additional pole, or 3 additional poles, each section of upgrade will be designed on its merits and environmental context, particularly in regard to safety and NZECP34 compliance.</p> <p>Applying a quantitative limit for NZECP 34 compliance is not considered to be an appropriate mechanism to be included in the PDP – hence, Centralines seeks removal of Condition NU-R2-(viii), or amendment as sought.</p>	<p>The following change is sought to NU-R2(1)(viii):</p> <p><del>Up to two additional electricity poles may be installed in existing networks where necessary to achieve conductor clearances required by NZCEP 34:2001.</del></p>
<p>General Residential Zone</p> <p>Settlement Zone</p> <p>Rural Lifestyle Zone</p> <p>Large Lot Residential Zone (Coastal)</p> <p>General Rural Zone</p> <p>Rural Production Zone</p> <p>Commercial Zone</p> <p>General Industrial Zone</p>	<p><b>NU-S1 - Gross Floor Area and Dimensions</b></p> <p>1. <i>Above ground buildings and structures must not exceed a gross floor area limit of:</i></p> <p>a) <i>10m<sup>2</sup> (where located within road reserve); and</i></p> <p>b) <i>15m<sup>2</sup> (where located outside road reserve).</i></p> <p>...</p>	Support in Part	<p>Upon review of standard NU-S1(1) Centralines wish to advise Council that the spatial dimensions provided are too small to contain a temporary generator. Centralines consider that to enable a standard temporary generator to be established, an area of 20m<sup>2</sup> is sought under the standard.</p> <p>Centralines notes that NU-S1(6) and (7) relate specifically to telecommunication cabinets and no change is sought in this regard. It is noted that in regard to ground mounted electricity distribution cabinets, a cabinet area of at least 5m<sup>2</sup> is required so as to provide an envelope for commonly used equipment contained. We note however that this infrastructure is provided for within the wider rule framework.</p>	<p>Retain as notified, with the exception of the changes sought below.</p> <p>1. <i>Above ground buildings and structures must not exceed a gross floor area limit of:</i></p> <p>a) <i>10m<sup>2</sup> (where located within road reserve); and</i></p> <p>b) <i>15m<sup>2</sup> (where located outside road reserve).</i></p> <p>c) <u><i>In the case of temporary electricity generators and self-</i></u></p>

				<p><u>contained power units to supply existing infrastructure a 20m<sup>2</sup> area is applicable.</u></p> <p>The same insertions/changes are sought in relation to NU-S1(9) and NU-S1(17).</p>
<p>General Residential Zone</p> <p>Settlement Zone</p> <p>Rural Lifestyle Zone</p> <p>Large Lot Residential Zone (Coastal)</p> <p>General Rural Zone</p> <p>Rural Production Zone</p> <p>Commercial Zone</p> <p>General Industrial Zone</p>	<p><b>NU-S3 - Height for Above Ground Buildings and Structures</b></p>	<p>Support in Part</p>	<p>Centralines observes that, as drafted, above ground buildings associated with network utilities have height limits that are more restrictive than height limits for buildings in the zone-based provisions. Centralines seeks amendments to bring alignment of the height limits for above ground buildings to match all height limits for buildings in the respective zones elsewhere in the PDP.</p> <p>In addition, Centralines notes that the standard currently specifies different maximum height for above ground poles for each zone which doesn't make sense for operation of the electricity distribution network. Minimum pole height is specified in NZCEP 34:2001 and is determined by voltage rather than location.</p> <p>Centralines seeks amendment to the standard so that the maximum height for poles is be amended so it is consistent across all zones. It is suggested that the height is aligned with the equivalent rule in the Hastings District Plan (NU2vi) which sets a maximum height for masts, antenna, aerials and poles for all zones of 25m. Centralines would not support a reduction in height from those currently specified in the PDP.</p>	<p>Make changes to NU-S3(3), (6), (10) to reflect the maximum height limits for buildings in the respective zone based chapters.</p> <p>Make changes to NU-S3(5), (8), (12) to reflect a maximum height limit of 25m.</p>
<p>General Residential Zone</p> <p>Settlement Zone</p>	<p><b>NU-S4 - Height in Relation to Boundary</b></p>	<p>Support in part</p>	<p>Centralines requests a note within the standard that clarifies that the provision does not apply to poles, lines, and antenna.</p>	<p>Retain as notified, with the exception of the changes sought below.</p>

Rural Lifestyle Zone Large Lot Residential Zone (Coastal) Rural Production Zone General Rural Zone			Amendment sought.	<u>Note: The height in relation to boundary standard does not apply to lines, poles, towers, telecommunication poles, antenna, and lightning rods).</u>
<b>Part 2 – Renewable Energy Entire Chapter</b>				
<b>Part 2 - REG – Renewable Energy</b>	Whole chapter	Support	Centralines notes that the renewable energy chapter is suitably enabling for both small-scale/community renewable energy generation and more large-scale renewable energy generation. Centralines also considers that the notified provisions strike the right balance between being enabling, while ensuring adequate consideration is given to avoiding, remedying, and mitigating adverse effects, including through off-setting regimes. Centralines supports the entire chapter.	Retain as notified.
<b>Part 2 – Natural Hazards Entire Chapter</b>				
<b>Part 2 - NH- Natural Hazards</b>	Whole chapter	Support	Centralines notes that Network Utilities are often required to be located within certain areas / environments to maintain their functional, operational, technical and locational needs to service communities. In this regard, electricity distribution lines at times need to cross rivers and streams and need to be located everywhere a customer chooses to locate including in overlays (sometimes in areas subject to natural hazards).  Centralines notes overhead lines are not restricted in Natural Hazard areas, and that buildings and structures	Retain as notified.

			associated with the electricity distribution network will be permitted in the Natural Hazard areas. Centralines supports this.	
<b>Part 2 – Historic Heritage Rules and Standards</b>				
<b>Part 2 - HH - Historic Heritage</b>	<b>HH-R2 - New underground electricity, gas or telecommunication customer connections, or the replacement of existing overhead electricity or telecommunication customer connections, affecting heritage items identified in HH-SCHED2</b>	Support	Centralines supports the Permitted Activity status of this rule.	Retain as notified.
<b>Part 2 – Notable Trees Rules and Standards</b>				
<b>Part 2 - TREE – Notable Trees</b>	<p><b>TREE-R2 - The trimming of any notable tree identified in TREE-SCHED4 for network utilities</b></p> <p><b>1. Activity Status: PER</b></p> <p><b>Where one of the following conditions are met:</b></p> <p>a. The trimming is required by statute or regulations including the Electricity (Hazards from Trees) Regulations 2003 and the Telecommunications Act 2001; or</p> <p>b. The tree is damaging, or threatening to</p>	Support in part	<p>Centralines supports this rule, but seeks a small edit to TREE-R2(1)(a) so that both regulations/acts do not need to be met. Centralines requests that “and” is replaced with “or”.</p> <p>Centralines also seeks a small change across the PDP, to note that where reference is made to regulations, such as the Electricity (Hazards from Trees) Regulations 2003, that the applicable rule applies also to any updated version of the regulation.</p> <p>Amendment sought.</p>	<p>Retain as notified, with the exception of the small amendment sought below:</p> <p><b>1. Activity Status: PER</b></p> <p><b>Where one of the following conditions are met:</b></p> <p>a. The trimming is required by statute or regulations including the Electricity (Hazards from Trees) Regulations 2003 <del>and</del> <u>or</u> the Telecommunications Act 2001; or</p>



	<p>damage, a network utility; or</p> <p>...</p>			<p>b. The tree is damaging, or threatening to damage, a network utility; or</p> <p>...</p>
	<p><b>TREE-R6</b> - The construction of, or addition to, any building associated with any activity or network utility, or laying of overhead or underground services within the dripline of any tree identified as a notable tree in TREE-SCHED4</p> <p><i>Note: This rule applies whether or not the building or network utility is on the same site as the notable tree concerned.</i></p> <p>1. Activity Status: RDIS</p> <p>Matters over which discretion is restricted:</p> <p><a href="#">TREE-AM1</a>.</p>	<p>Oppose</p>	<p>Centralines support the protection of vegetation where possible; however, Centralines notes that Rule TREE-R<sup>A</sup> does not provide an exemption to enable compliance with the <u>Electricity (Hazards from Trees) Regulations 2003</u>.</p> <p>Centralines therefore seeks a permitted activity rule to acknowledge works that are required to be undertaken by utility operators, rather than jumping straight to a RDIS activity, It is requested that the permitted activity would precede the RDIS rule, thereby enabling works to occur where they are required by either the Electricity (Hazards from Trees) Regulations 2003 or the Telecommunications Act 2001, or the tree is damaging, or threatening to damage, a network utility.</p> <p>In this regard, Centralines seeks a rule that is similar to TREE-R2.</p> <p>As noted above, Centralines also seeks a small change across the PDP, to note that where reference is made to regulations, such as the Electricity (Hazards from Trees) Regulations 2003, that the applicable rule applies also to any updated version of the regulation.</p> <p>Amendments are sought.</p>	<p>Insert new Permitted Activity rule</p> <p><b>1. Activity Status: PER</b></p> <p>- <b><u>Where one of the following conditions are met:</u></b></p> <p><u>where the activity involves works within the root protection area of a notable tree identified in TREE-SCHED4 and the activities are required:</u></p> <p>i. <u>To comply with the Electricity (Hazards from Trees) Regulations 2003;</u></p> <p>ii. <u>To comply with the Telecommunications Act 2001; or</u></p> <p><u>For maintenance and repair purposes.</u></p>
<p><b>Part 2 – Ecosystems and Indigenous Biodiversity Rules and Standards</b></p>				
<p>Part 2 - ECO –</p>	<p><b>ECO-R3</b> - Trimming or</p>	<p>Support</p>	<p>Centralines supports the permitted activity status of this</p>	<p>Retain as notified.</p>

<p><b>Ecosystems and Indigenous Biodiversity</b></p>	<p><i>clearance of indigenous vegetation inside any area of significant indigenous vegetation and/or significant habitat of indigenous fauna (excluding natural wetlands)</i></p> <p><b>1. Activity Status: PER</b></p> <p><b>Where the following conditions are met:</b></p> <p>a. <i>Limited to (whichever is the lesser):</i></p> <p style="padding-left: 20px;"><i>i. clearance of no more than 500m<sup>2</sup> of indigenous vegetation per site per calendar year; or</i></p> <p style="padding-left: 20px;"><i>ii. clearance of no more than 1% of the area of a Significant Natural Area identified in <u>ECO-SCHED5</u> per calendar year.</i></p> <p>OR</p> <p>b. <i>Limited to trimming or clearance that is:</i></p> <p style="padding-left: 20px;"><i>i. required to achieve compliance with the requirements of the Electricity (Hazards from Trees) Regulations 2003; or</i></p> <p>...</p>		<p>rule, and recognition that works may be required in identified SNAs in accordance with the Electricity (Hazards from Trees) Regulations 2003, or as is necessary to provide for the safe and efficient operation, maintenance, and upgrading of network utilities.</p> <p>Network Utilities are often required to be located within certain areas / environments to maintain their functional, operational, technical and locational needs to service communities.</p> <p>Centralines seeks a small change across the PDP, to note that where reference is made to regulations, such as the Electricity (Hazards from Trees) Regulations 2003, that the applicable rule applies also to any updated version of the regulation.</p> <p>Centralines otherwise supports this rule as notified.</p>	
--	---	--	--	--

	<p>vi. necessary to provide for the ongoing safe and efficient operation, maintenance and upgrading of telecommunication, radio communication and other network utilities, but excluding their expansion, where carried out by the respective network operator;</p> <p>...</p>			
<b>Part 2 – Subdivision Objectives and Policies</b>				
<b>Part 2 - SUB - Subdivision</b>	<p><b>SUB-03</b></p> <p><i>The provision of appropriate services to subdivided lots, in anticipation of the likely effects of land use activities on those lots, so as to ensure the health and safety of people and communities, and the maintenance or enhancement of amenity values.</i></p>	Support in part	<p>Centralines support the principle behind Objective SUB-03 in regard to the servicing of subdivision; however, Centralines notes that the PDP definition of “SERVICES” does not include network infrastructure such as the electricity distribution network. Centralines consider that the coverage of the Objective is broadened to include all Infrastructure (such as the electricity distribution network).</p> <p>Centralines seek that Objective SUB-03 is suitably expanded upon so as to include all key infrastructure and not favour Council’s services.</p> <p>Amendment is sought.</p>	<p>Retain as notified, with amendments as follows:</p> <p><b>SUB-03</b></p> <p><i>The provision of appropriate services and <u>infrastructure</u> to subdivided lots, in anticipation of the likely effects of land use activities on those lots, so as to ensure the health and safety of people and communities, and the maintenance or enhancement of amenity values.</i></p>
	<p><b>SUB-04</b></p> <p><i>Reverse sensitivity effects of subdivisio</i></p>	Support	Centralines supports SUB-04.	Retain as notified.

	<i>n on existing lawfully established activities (including network utilities) are avoided where practicable or mitigated where avoidance is not practicable.</i>			
	<p><b>SUB-P3</b></p> <p><i>To allow the creation of lots of various sizes and dimensions for public works, network utility operations, renewable electricity generation, reserves and access.</i></p>	Support	Centralines supports SUB-P3, both from the perspective of a network utility operator, but also in regard to enabling subdivision around sites accommodating renewable electricity generation.	Retain as notified.
	<p><b>SUB-P12</b></p> <p><i>To avoid or mitigate any adverse visual and physical effects of subdivision and development on the environment, including the appropriate underground reticulation of energy and telecommunication lines in order to protect the visual amenities of the area.</i></p>	Support in part	<p>Centralines assets include distribution lines and associated infrastructure throughout the district. Undergrounding across the distribution (11kV and 400V) networks is undertaken when appropriate as part of Centralines’ Lifecycle Asset Management Process. Due to the rural location of many of the electricity assets and the high cost of undergrounding electricity distribution infrastructure in rural areas, only 6.8% of Centralines infrastructure is underground. It is not feasible in many situations to provide underground cables. Centralines therefore seeks recognition in the policy that in cases where this is not technically or commercially feasible, that there is room for flexibility.</p> <p>Amendments are sought.</p>	<p>Amendments are sought as follows:</p> <p><b>SUB-P12</b></p> <p><i>To avoid or mitigate any adverse visual and physical effects of subdivision and development on the environment, including the appropriate underground reticulation of energy and telecommunication lines in order to protect the visual amenities of the area, <u>where this is technically and commercially feasible.</u></i></p>
	<p><b>SUB-P17</b></p> <p><i>To ensure, to the extent practicable, subdivision design that takes into account the</i></p>	Support in part	Centralines supports the intent and direction of this policy; however, as worded, the policy refers to “regionally significant infrastructure”. Centralines notes that this is not a defined term in the PDP, nor is it defined in the HBRPS. In regard to the latter,	Include a definition in the PDP, for either regionally significant infrastructure, or strategic infrastructure, which includes:

	<i>location of regionally significant infrastructure, network utilities, renewable electricity generation sites and other lawfully established activities, and ensures that future land use activities will not result in reverse sensitivity effects.</i>		<p>Centralines notes that the HBRPS has a definition of “Strategic Infrastructure”.</p> <p>Centralines supports the policy but suggests that a definition for either regionally significant infrastructure, or strategic Infrastructure should be included in the PDP. In this regard, Centralines note that the following activities should be classified in any such definition:</p> <p><i>... ) the electricity transmission network and electricity distribution networks</i></p> <p><i>... ) renewable electricity generation activities.</i></p> <p>Amendment to definition(s) sought.</p>	<p><u><i>... ) the electricity transmission network and electricity distribution networks</i></u></p> <p><u><i>... ) renewable electricity generation activities</i></u></p>
<b>Part 2 – Subdivision Rules and Standards</b>				
	<b>SUB – R3</b> <i>Subdivision for special purposes</i>	Support	Centralines supports this rule, noting it provides for the creation of lots for network utilities and renewable electricity generation activities as a Controlled Activity, subject to compliance with conditions.	Retain as notified.

	<p><b>SUB-AM8</b></p> <p><i>General</i></p> <p>...</p> <p>3. <i>The potential effects from a proposed subdivision or development of land on the safe and efficient operation of network utilities.</i></p> <p>4. <i>The provision of electricity to the site boundary for any urban zone (GRZ – General Residential Zone, COMZ – Commercial Zone, GIZ – General Industrial Zone), to be confirmed by the electricity network utility as a condition of consent.</i></p>	Support	Centralines supports this assessment matter, and in particular, SUB-AM(3) and SUB-AM(4).	Retain as notified.
<b>Part 2 – Earthworks Rules and Standards</b>				
<b>Part 2 - EW - Earthworks</b>	<b>EW-R1 - Specified Earthworks</b>	Support	Centralines notes that earthworks that are associated with any network utilities are explicitly permitted by EW-R1(1)(b). Centralines fully supports this.	Retain as notified.
	<p><b>EW-R7 - All Other Earthworks not otherwise provided for</b></p> <p><b>1. Activity Status: PER</b></p> <p><b>Where the following conditions are met:</b></p> <p>a. Compliance with:</p> <p>i. <u>EW-S1</u>;</p>	Support in part	<p>Centralines supports this “catch-all” rule – and in particular it supports EW-R7(1).</p> <p>However, Centralines notes that the matters of discretion listed at EW-R7(2) do not include effects that would be considered if there is a breach to EW-S8.</p> <p>Centralines seeks that additional matter(s) of discretion are included to enable effects to be considered in relation to any non-compliance with this standard.</p>	<p>Retain as notified, with the inclusion of an appropriate matter of discretion that enables consideration of the following matters:</p> <p>a. Impacts on the operation, maintenance, upgrading and development of the electricity network.</p>

	<ul style="list-style-type: none"> <li>ii. <u>EW-S2</u>;</li> <li>iii. <u>EW-S3</u>;</li> <li>iv. <u>EW-S4</u>;</li> <li>v. <u>EW-S5</u>;</li> <li>vi. <u>EW-S6</u>;</li> <li>vii. <u>EW-S7</u>; and</li> <li>viii. <u>EW-S8</u>.</li> </ul> <p><b>2. Activity status where compliance not achieved: RDIS</b></p> <p><b>Matters over which discretion is restricted:</b></p> <ul style="list-style-type: none"> <li>a. <u>EW-AM1</u>.</li> <li>b. <u>EW-AM2</u>.</li> <li>c. <u>EW-AM3</u>.</li> <li>d. <u>EW-AM4</u>.</li> <li>e. <u>EW-AM5</u>.</li> <li>f. <u>EW-AM6</u>.</li> <li>g. <u>EW-AM7</u>.</li> </ul>			<ul style="list-style-type: none"> <li>b. The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</li> <li>c. The risk to the structural integrity of any support structures associated with the electricity network.</li> <li>d. Technical advice provided by the National Grid owner (Transpower) or electricity distribution network provider Centralines Limited.</li> </ul>
	<p><b>EW-S8 - Electrical Safety Distances</b></p> <p>1. Any earthworks within the vicinity of overhead electric lines must comply with the New Zealand Electrical Code of Practice for Electrical Safety Distances (NZECP 34:2001)</p>	Support	Centralines supports the standard as compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) is mandatory under the Electricity Act 1992.	Retain as notified.
<b>Part 3 - Zones - All</b>				
<b>Part 3 - All zones</b>	<b>[Standard(s) relating to]:</b> Electricity Safety Distances	Support in part	Centralines notes that compliance with <i>New Zealand Electrical Code of Practice for Electrical Safety Distances (NZECP 34:2001)</i> is mandatory. Centralines	Inclusion of relevant assessment matters in the matters of discretion, which relate to a

	<p>1. Any activity, including the establishment of buildings and structures within the vicinity of overhead electric lines must comply with the New Zealand Electrical Code of Practice for Electrical Safety Distances (NZCEP 34:2001).</p>		<p>therefore supports the standard relating to Electricity Safety Distance contained in the following zones:</p> <ul style="list-style-type: none"> <li>• LLRZ – Large Lot Residential Zone (LLRZ-S11)</li> <li>• GRZ – General Residential Zone (GRZ-S11)</li> <li>• GRUZ – General Rural Zone (GRUZ-S7)</li> <li>• RLZ – Rural Lifestyle Zone (RLZ-S11)</li> <li>• RPROZ - Rural Production Zone (RPROZ-S8)</li> <li>• SETZ - Settlement Zone (SETZ-S11)</li> <li>• COMZ – Commercial Zone (COMZ-S7)</li> <li>• GIZ – General Industrial Zone (GIZ-S6)</li> </ul> <p>However, Centralines notes that if compliance is not achieved with the above standards, the matters of discretion throughout the various zone chapters do not include consideration of effects that relevant to a breach to the Electricity Safety Distance standard.</p> <p>Centralines seeks that additional matter(s) of discretion are included in each zone chapter to enable effects to be considered in relation to any non-compliance with this standard.</p> <p>Centralines also seeks a notification clause that requires written approval from the relevant electricity network utility operator.</p>	<p>breach of the Electricity Safety Distance standard The following matters are suggested:</p> <ol style="list-style-type: none"> <li>a. Impacts on the operation, maintenance, upgrading and development of the electricity network.</li> <li>b. The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</li> <li>c. The risk to the structural integrity of any support structures associated with the electricity network.</li> <li>d. Technical advice provided by the National Grid owner (Transpower) or electricity distribution network operator (Centralines Limited).</li> </ol> <p>Insert a notification clause requiring written approval.</p>
<p><b>Part 3 – General Industrial Zone Rules and Standards</b></p>				
<p><b>Part 3 – General Industrial Zone</b></p>	<p><b>GIZ-R16</b> New noise sensitive activities within the Air Noise Boundary or Outer Control Boundary for the Waipukurau Aerodrome</p> <p>1. Activity Status: PR</p>	<p>Oppose</p>	<p>Centralines owns land that is affected by the Air Noise Boundary for the Waipukurau Aerodrome. Centralines acknowledges that new noise sensitive activities should be discouraged in this area but considers a Prohibited Activity status to be too restrictive and does not provide flexibility for changes in land use where the activity is appropriate, and effects adequately</p>	<p>Amendments are sought as follows:</p> <p><b>GIZ-R16</b> New noise sensitive activities within the Air Noise Boundary or Outer Control</p>



	Where the following conditions are met: N/A		<p>mitigated. Centralines seeks a change to activity status to enable an application to be made, and the appropriateness to be ascertained through the resource consent process.</p> <p>Alternatively, Centralines seeks the removal of the Outer Control Boundary for the Waipukurau Aerodrome from its land at 2294 Takapau Road (Lot 2 DP 339439).</p>	<p>Boundary for the Waipukurau Aerodrome</p> <p>1. Activity Status: <del>PR</del> <u>NC</u></p> <p>Where the following conditions are met: N/A</p>
	<p><b>GIZ-S1 - Height of Buildings</b></p> <p>1. Maximum height of any building(s) is 12m.</p> <p><i>Note: in all instances, height is measured from the natural ground level.</i></p>	Oppose	<p>Centralines considers that a maximum height limit of 12m is too constraining and does not adequately enable a range of activities and buildings in the GIZ. The Central Hawke’s Bay is likely to attract more industry as available industrial land elsewhere in the region becomes constrained. Centralines seeks a more enabling maximum height limit of 15m – noting that this is more consistent with height limits in Industrial Zones in other parts of the country.</p>	<p>Amendments are sought as follows:</p> <p><b>GIZ-S1 - Height of Buildings</b></p> <p>1. Maximum height of any building(s) is <del>12m</del> <u>15m</u>.</p> <p><i>Note: in all instances, height is measured from the natural ground level.</i></p>