



**NOTICE OF SUBMISSION BY POWERCO LIMITED ON PROPOSED PLAN CHANGE
65 OF THE MANAWATŪ DISTRICT PLAN**

To: Manawatū District Council
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Via email: districtplanreview@mdc.govt.nz

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A. INTRODUCTION

1. Powerco Limited (*Powerco*) is New Zealand's largest electricity and second largest gas distributor in terms of network length and has been involved in distribution in New Zealand spanning more than a century. The Manawatū rural sub-transmission network (ex-Manawatū Oroua EPB) consists of open 33kv rings feeding four substations around the periphery of Palmerston North, and 33kV radial feeders to Sanson and Kimbolton via Feilding. The Feilding substation supplies Feilding's entire load. The 33kV circuits are predominantly overhead construction on concrete poles.
2. Powerco also operates a gas distribution network within the Manawatū district, which includes a network of underground pipes, valves and above-ground facilities such as District Regulator Stations (DRS) and Gas Measurement Systems (GMS). Powerco's gas assets are located in and around Feilding and Sanson and serve both urban and rural areas.
3. Powerco has telecommunication facilities to monitor and control its networks, as well as enabling communications with field crews who undertake work on the Powerco network.
4. Powerco has numerous assets that are located within the Outstanding Natural Landscapes (ONL's), Outstanding Natural Features (ONF's) and Significant Amenity Features (SAF's) overlays. A plan of these assets is included in **Attachment A**. Assets generally consist of 11KV High Voltage overhead lines, transformers and some undergrounded lines.
5. As such, Powerco seeks to ensure that its assets located within the six ONF's/ONL's and two SAF overlays are appropriately provided for to enable the ongoing development, operation, maintenance and upgrading of these networks.

Background

6. By way of background, Powerco previously provided a submission on Plan Change 55 which related to the following Proposed District Plan provisions:
 - Definitions in Chapter 2;
 - Objectives and Policies in Chapter 3 District Wide Rules;
 - Rules, Permitted Activity Standards and the Matters of Discretion in Chapter 3 District Wide Rules (Section 3A Network Utilities, Section 3D Earthworks, Section 3E Signs and Section 3F Temporary Activities)

7. On 8 June 2017, Powerco lodged an appeal to the Environment Court in relation to Plan Change 55. As part of considering this appeal the Environment Court issued a Minute dated 2 May 2018 (Powerco Limited (ENV-2017-WLG-000060) with a consent order requesting Plan Change 55 in part be implemented as set out in Appendix A of the decision. This instructed some amendments to Chapter 3 District Wide Rules to be implemented in part. The amendments clarified the implementation of this chapter against the zone provisions i.e. superseded the other provisions.
8. In July 2019, Powerco lodged comments on draft Plan Change 65 – Natural Features and Landscapes. In summary, this submission primarily sought to clarify the relationship of Chapter 3A Network Utilities with the draft Plan Change 65 documents. As both chapters are “District Wide” chapters, Powerco sought to clarify which chapter takes precedence over the other, as tension between the two chapters was evident. This remains the case in the notified version of Plan Change 65, as the introduction wording is still unclear.

The Resource Management Act 1991

9. Under the Resource Management Act 1991 (RMA), Powerco’s gas and electricity infrastructure is a significant physical resource that must be sustainably managed and any adverse effects on that infrastructure must be avoided, remedied or mitigated.

The Regional Policy Statement – the Horizons One-Plan (2014)

10. The Horizons One Plan (which incorporates the Regional Policy Statement) contains relevant provisions in relation to the protection of electricity and gas distribution networks, including:
 - Having regard to the benefits of infrastructure and providing for their establishment, operation, maintenance and upgrading (Objective 3-1);
 - Ensuring that the benefits of infrastructure are recognised and appropriately weighed along with other matters in the decision making process. (Policy 3-1);
 - Ensuring that adverse effects on infrastructure and other physical resources of regional or national importance from other activities are avoided as far as reasonably practicable (Policy 3-2); and
 - Requiring decision makers to, in managing adverse effects of new infrastructure, take into account a range of factors including the need for the infrastructure, any functional, operation or technical constraints that require the infrastructure to be located or designed in the manner proposed, alternative locations and whether the effects can be off-set (Policy 3-3).

11. Powerco's electricity and gas distribution networks are recognised in the One Plan as being of regional or national importance. It is, therefore, essential that its management is comprehensively addressed in the Manawatū District Plan.
 12. Plan Change 65 partially gives effect to the Regional Policy Statement, insofar as it doesn't fully balance the need for essential infrastructure to sometimes locate within an ONL, ONF or SAF if there is no other option.
- C. THE SPECIFIC PROVISIONS OF PLAN CHANGE 65 – OUTSTANDING NATURAL FEATURES AND LANDSCAPES THAT POWERCO'S SUBMISSION RELATES TO ARE SUMMARISED AS FOLLOWS:**
13. The submission relates specifically to the following provisions:
 - Identification of Powerco's assets in the newly identified ONF, ONL and SAF overlays;
 - New Definitions contained within Chapter 2 for 'functional' and 'operational' need;
 - Amendments to Chapter 3A Network Utilities and Chapter 3D Earthworks which address network utilities within ONF, ONL and SAF overlays; and
 - New proposed Chapter NFL - Natural Features and Landscapes Chapter.
 14. The specific provisions submitted on, the rationale for Powerco's submission on each of these matters, and the relief sought is contained in **Attachment B**. In the specific relief sought, all additions are shown in underline, with all deletions in ~~strikethrough~~.
 15. In summary, Powerco's primary concerns in relation to Proposed Plan Change 65 – Natural Features and Landscapes are:
 - The relationship between Chapters 3A Network Utilities and 3D Earthworks and new chapter NFL – Natural Features and Landscapes. The introduction text to Chapter NFL – Natural Features and Landscapes states "it should be read alongside" Chapters 3A Network Utilities and 3D Earthworks. It is still unclear which provisions take precedence and prevail;
 - Some policies are convoluted, cross reference other policies, contain conflicting effects thresholds or are not easily interpreted;
 - Powerco supports the references to functional operational need within the objectives and policies framework;
 - Powerco maintains its objection to the non-complying activity resource consent status and 'avoid' policies for construction of new network utilities within an ONL; and
 - The identification and difference between an ONF or ONL is unclear in NFL – APP1 – Outstanding Natural Features and Landscapes. For example, "ONF 3 – Rangitikei River" is referenced as an ONF by virtue of "ONF 3" however the corresponding table heading is "Features of Outstanding Natural Landscape". This should be updated so it is clear if the

feature is one or the other or both, as some of the policies are specifically referencing one or the other. Suggest separate schedules are prepared for ONF's and ONL's (similar to SAF's).

- D. POWERCO WISHES TO BE HEARD IN SUPPORT OF THIS SUBMISSION**

- E. IF OTHERS MAKE A SIMILAR SUBMISSION, POWERCO WOULD BE PREPARED TO CONSIDER PRESENTING A JOINT CASE AT ANY HEARING.**

- F. POWERCO COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.**

Signature of person authorised to sign on behalf of Powerco Limited



Louise Allwood
Technical Lead – Planning

Dated this 4th day of March 2020

IDENTIFICATION OF POWERCO ASSETS IN RELATION TO ONF'S, ONL'S and SAF'S

A. Powerco's assets are located in the following ONF's, ONL's and SAF's:

- ONF 3- Rangitikei River – Powerco assets in this area, 11KV High Voltage overhead lines (red lines) cross the river and transformers (blue triangles) are within this area.
- ONF 4 – Mangamako Gorge – Powerco assets in this area are 11KV High Voltage overhead lines and a transformer through this area.
- ONF 7 – Mangaoira and Mangahuia Stream – Powerco assets in this area are 11KV High Voltage overhead lines and transformers.
- ONF 9 – Upper Pohangina River – Powerco assets in this area are 11KV High Voltage overhead lines and transformers in this area.
- ONF 10 – Totara Reserve – Powerco assets in this area are 11KV High Voltage overhead lines, underground cables (red dashed lines) and transformers.
- ONFL 14 – Pukepuke Lagoon – Powerco assets in this area are 11KV High Voltage overhead lines and transformers.
- SAF 2 – Upper Oroua River and River Valley – Powerco assets in this area are 11KV High Voltage overhead lines and transformers.
- SAF 3 – Makiekie Creek – Powerco assets in this area are 11KV High Voltage overhead lines and transformers.

Powerco's asset maps are provided in Attachment A.

Attachment B			
SECTION	PROVISION	COMMENTS ON PROPOSED PROVISIONS	RELIEF SOUGHT
CHAPTER 2 DEFINITIONS	Functional Need	<p>The definition of ‘functional need’ reads as follows:</p> <p><i>FUNCTIONAL NEED: means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.</i></p> <p>Powerco supports the definition insofar as it provides for Powerco’s functional need to locate their assets in a particular location, i.e. there is nowhere else it can be located. It is consistent with the national planning standards.</p>	Retain the definition
	Operational Need	<p>The definition of ‘operational need’ reads as follows:</p> <p><i>OPERATIONAL NEED: means the need for a proposal or activity to traverse, locate or operate in a particular environment because of a technical, logistical or operational characteristics or constraints.</i></p> <p>The definition of ‘operational need’ is generally supported and is appropriate, as it applies to Powerco’s assets and recognises their operational requirement to locate in a particular location. It is consistent with the national planning standards.</p>	Retain the definition
CHAPTER 3 – 3A NETWORK UTILITIES	Policy 1.5	<p>Powerco maintains its previous submission point in relation to Policy 1.5. The requirement to “ensure” construction and location that is sensitive to the amenity</p>	Delete Policy 1.5 as to ‘ensure’ construction and location that is sensitive to the amenity and landscape values is unnecessarily directive.

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		and landscape values is quite directive, particularly when read in contrast to Policy 1.4 which only requires the recognition of locational requirements. Powerco considers that the Policy intent would better be achieved by the deletion of the notified Policy 1.5 and the inclusion of a new Policy 1.5. The proposed amendments to Policy 1.5 by “including those areas identified as Significant Amenity Features in NFL-APP2.” further exacerbates the directness of the policy. There is no acknowledgement of the balance between these potential effects and the benefits network utilities provide to the social, economic and wellbeing of a community, by recognising that it is only the significant adverse effects that need to be avoided, remedied or mitigated.	<p><i>To ensure network utilities are constructed and located in a manner sensitive to the amenity and landscape values where are located, including those areas identified Significant Amenity Features in NFL-APP2.</i></p> <p>Insert a new Policy (1.5) that recognises that the significant effects on network utilities cannot always be avoided, remedied or mitigated:</p> <p><i>To ensure that significant adverse effects on the environment are avoided, remedied or mitigated.</i></p>
	Objective 3	Powerco supports the amendment to Objective 3. The purpose of Objective 3 adequately recognises the development of network utilities whilst seeking to manage effects. The reference to “NFL-APP1” reduces ambiguity in the application of the objective in relation to the ONF’s and ONL’s. Powerco suggests minor amendments to the wording of Objective 3 to reference new network utilities and to clarify interpretation, including by adding a	<p>Amend Objective 3 to clarify historic heritage appendices, as follows:</p> <p><i>The characteristics and values of the Outstanding Natural Features and Landscapes identified in <u>Appendix NFL-APP1</u> and historic heritage <u>identified in Appendix 1F and 1E,</u> are protected from the inappropriate use and development of <u>new network utilities.</u></i></p>

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		<p>reference to the Appendices which include the lists of historic heritage and commas to identify that this is a compound sentence. Referencing “use and development” is unnecessarily restrictive for maintenance and upgrading of existing assets.</p> <p>Notwithstanding the proposed amendments to Objective 3, duplication remains between Objective 3 and Policy 3.1, as addressed in the next submission point.</p>	
	Policy 3.1	<p>Powerco maintains its previous submission point in relation to Policy 3.1, insofar as its intent and purpose is incorporated into Objective 3 and it is simply a duplication. Delete Policy 3.1. In addition, Policy 3.1 is more restrictive than Objective 3.</p>	<p>Delete Policy 3.1 as this policy is now incorporated into the amendments sought to Objective 3, as follows:</p> <p><i>To protect the characteristics and values of Outstanding natural Features and Landscapes scheduled in NFL APP1 or a site of historic heritage scheduled in Appendix 1E (Buildings and Objects with Heritage Value) and 1F (Sites with Heritage Value) from the effects of network utilities.</i></p>
	Policy 3.2	<p>Powerco understands that the intent of Policy 3.2 is to manage the cumulative effects of new network utilities. Powerco’s previous submission point in relation to the draft Plan Change 65 remains, insofar as it may be difficult to interpret in terms of determining significant adverse cumulative effects. Part of an ONF’s and ONL’s may be</p>	Retain as notified.

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		able to absorb new network utilities locating there if there are existing network utilities in that part of the landscape, as opposed to locating where there are none. In addition, there may also be no practicable alternative.	
	Policy 3.3	<p>Policy 3.3 provides an exception to this where network utilities are unable to avoid the area as far as reasonably practicable and where works cannot be avoided in the ONF's or ONL's any adverse effects should be remedied or mitigated. The main body of Policy 3.3 does not refer specifically to new network utilities. Furthermore, it is not good practice to have a definition embedded within a policy. Policy 3.3 also provides a convoluted test with three parts to it, as set out below:</p> <p><i>“For the purpose of policy 3.3, reasonably practicable means where:</i></p> <ol style="list-style-type: none"> <i>a. there is no reasonably practicable alternative location, recognising the functional and operational need to the network utility; and</i> <i>b. the infrastructure is of national or regional importance; and</i> 	<p>Amend Policy 3.3 to have one effects threshold and remove definitions within the policy and create a new policy (Policy 3.3A) recognising the functional and operational need of infrastructure;</p> <p><i>Except as required by Policy 3.2, To avoid adverse effects from new network utilities as far as reasonably practicable. insofar as there is no reasonable alternative location, and Where avoidance is not reasonably practicable, remedy or mitigate adverse effects on the characteristics and values identified in Appendix NFL-APP1, (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or 1F (Sites with Heritage Value).</i></p> <p><i>For the purpose of policy 3.3, reasonably practicable means where:</i></p> <ol style="list-style-type: none"> <i>a. There is no reasonably practicable alternative location, recognising the function and operational need of the network utility; and</i>

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		<p><i>c. the development does not have a significant adverse effect on the characteristics and values identified in Appendix NFL-APP1 (Outstanding natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or F1 (Sites with Heritage Value)."</i></p> <p>Part c of Policy 3.3 contradicts the requirement of Policy 3.3 "<i>remedy or mitigate adverse effects on the characteristics and values identified in NFL-APP1.</i>" by stating "<i>development does not have a significant adverse effects on</i>". Policy 3.3 requires two effects thresholds to be met and sets out different appendices. For example Policy 3.3 refers to NFL-APP1 whilst part c of Policy 3.3 refers to "<i>Appendix NFL-APP1 (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or 1F (Sites with Heritage Value)</i>".</p>	<p><i>b. The infrastructure is of national or regional importance; and</i></p> <p><i>c. The development does not have a significant adverse effect on the characteristics and values identified in Appendix NFL APP1 (Outstanding Natural Features and Landscapes), Appendix 1E (Buildings and Objects with Heritage Value) or 1F (Sites with Heritage Value).</i></p>
	Policy 3.4	Powerco supports Policy 3.4 as it provides for works associated with existing network utilities located within ONF's and ONL's.	Retain as notified

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	Policy 3.5	Policy 3.5 seeks to avoid inappropriate use and development within ONL's which adversely affects the values of the areas. Policy 3.5 is in direct contrast with Policy 3.4 as it is not clear if it is in relation to the construction of new network utilities. Policy 3.5 also generally refers to use and development rather than specifying network utilities. Powerco acknowledges that network utilities can have adverse effects on ONL's but suggests amendments to Policy 3.5 for clarity and application of Policies 3.4 and 3.5. In addition, Policy 3.5 commands a high statutory test and effectively restricts the location of any network utilities within an ONL and more specifically the Manawatū Coastline ONL and Ruahine ONL.	<p>Amend Policy 3.5 to clarify and soften its application, as follows:</p> <p><i>To avoid inappropriate use and development <u>of new network utilities</u> within Outstanding Natural Landscapes which adversely affects the identified values and characteristics of the areas, and adverse effects <u>are unable to be mitigated or remedied</u>, including:</i></p> <ul style="list-style-type: none"> <i>a. The extensive unbuilt coastal strip along the Manawatu Coastline Outstanding Natural Landscape.</i> <i>b. The unmodified and continuous indigenous values and the ridges and hilltops of the Ruahine Ranges Outstanding Natural Landscape.</i>
	Section 3A.4.3 Standards for Permitted Activities	Powerco supports the amendment to the permitted activity standard 3A.4.3.j, as it references the new appendices NFL-APP1 and NFL-APP2, however, suggests "Appendices" should be included to provide clarity. A comma is required after 'minor upgrading works' to reflect the compound nature of the sentence.	<p>Amend 3A.4.3j (standards for permitted activities) as follows:</p> <p><i>Works that are undertaken outside of an existing road corridor carriageway, or that are not in operation, maintenance, replacement or minor upgrading works, must not be located within the areas scheduled in Appendix <u>Appendices</u> 1A (Wetlands, Lakes, Rivers and their Margins),</i></p>

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			<i>1B (Significant Areas of Indigenous Forest/Vegetation (excluding Reserves), 1D (Trees with Heritage Value), 1E (Buildings and Objects with heritage Value), 1F (Sites with Heritage Value), Outstanding natural Features and Landscapes identified in NFL-APP1 or Significant Amenity Features identified in NFL-APP2 of this Plan.</i>
	Section 3A.4.4 Restricted Discretionary Activities	Powerco supports the amendment to the restricted discretionary assessment criteria vi) as it provides clarity to the location of the ONF's and ONL's, however, suggest the word "Appendices" is inserted for clarity.	Amend 3A.4.4 Restricted Discretionary Activities assessment criteria vi), as follows: <i>Whether the activity impacts on the scheduled heritage values in Appendices Appendix 1A Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding reserves), 1D (Trees with Heritage Value), 1E (Buildings and Objects with Heritage Value), 1F (Sites with Heritage Value), Outstanding natural Features and Landscapes identified in NFL-APP1 or Significant Amenity Features identified in NFL-APP2 of this Plan, if so, how such impacts are remedied or mitigated.</i>
	Section 3A.4.5 Discretionary Activities	Powerco supports the reduction of activity status from non-complying activity to discretionary activity in relation to the construction of new and upgrading (other than minor upgrading) network utilities in relation to ONF's and	Amend 3A.4.5 Discretionary Activities a., as follows: <i>The following activities shall be a Discretionary Activity</i> <i>a. Any new network utility, including windfarms and new transmission and distribution electricity lines within any Outstanding Natural Feature as</i>

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		SAF's. Amendments are suggested to insert the word "appendix" where relevant for clarity.	<i>identified in <u>Appendix NFL-APP1</u> or Significant Amenity Feature identified in <u>Appendix NFL-APP2</u>.</i>
	Section 3A.4.6 Non-Complying Activities	Powerco maintains its previous submission in relation to Plan Change 55 with reference to this rule. Non-complying activity status pre-empts the need to weigh the protection of natural resources against the appropriate development of physical resources in order to achieve sustainable management and fails to take account the traversing of such utilities across a range of environments. When new infrastructure is proposed a robust assessment and route selection process is undertaken. However, it is not always possible to completely avoid sensitive areas such as these.	Amend 3A.4.6 Non-Complying Activities, as follows: <i>Any new <u>non-linear</u> network utility, including windfarms and new transmission and distribution electricity lines located within Outstanding Natural Landscape identified in <u>Appendix NFL-APP1</u>.</i>
Chapter 3: 3D EARTHWORKS	Policy 1.3	Powerco supports Policy 1.3 as it now refers to management of risk. Suggest minor amendment to include "Appendix" reference for clarity.	Amend Policy 1.3, as follows: <i>To restrict earthworks in Outstanding Natural Features or Landscapes as scheduled in <u>Appendix NFL-APP1</u>, except where earthworks are necessary to manage risk to human health and safety.</i>
	Section 3D.4.4 Discretionary Activities	Powerco notes the exclusion of "the minor upgrading, replacement or maintenance of network utilities" within the definition of earthworks. Thereby excluding these activities from complying with Section 3D – Earthworks. Powerco acknowledges the reduction in activity status	Retain as notified.

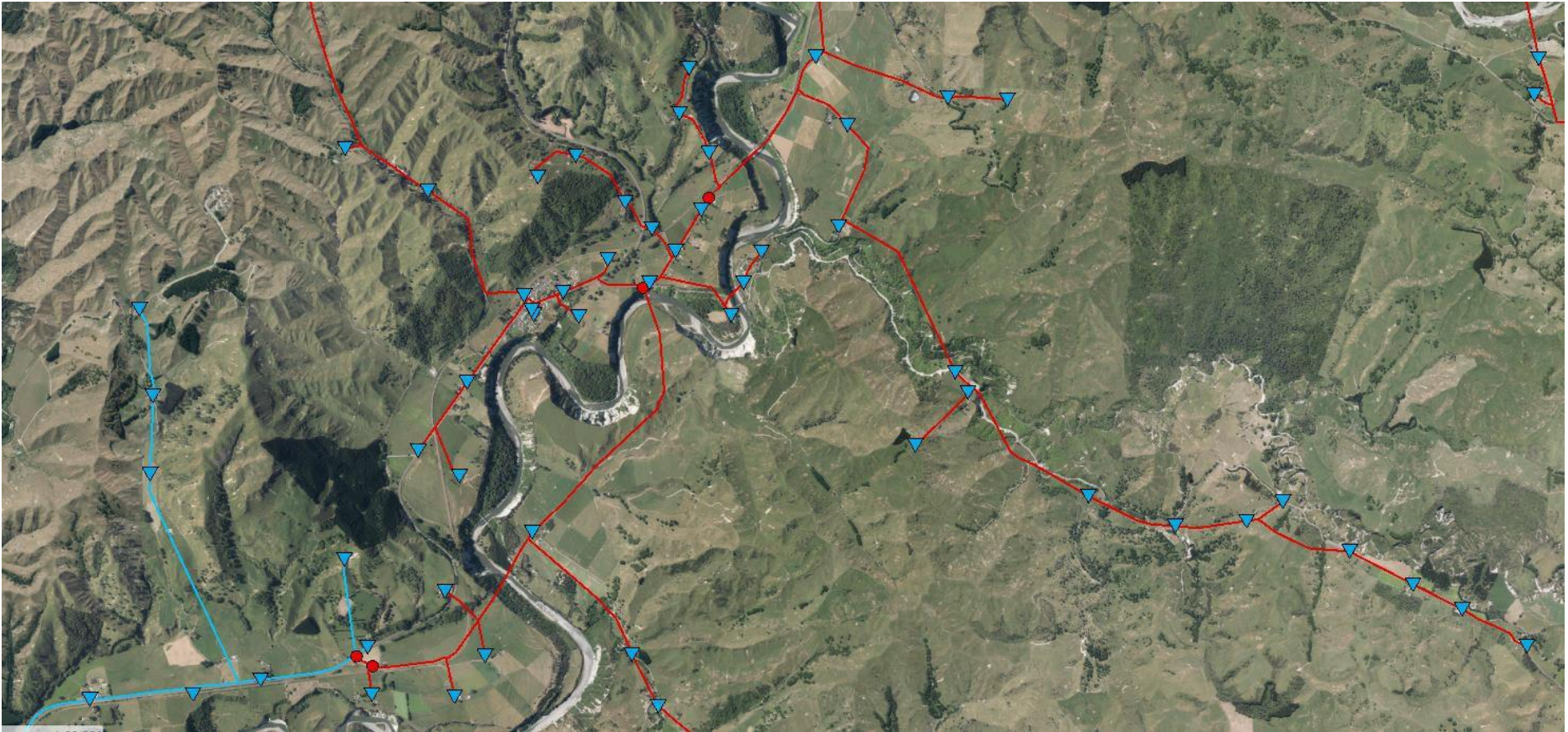
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		from non-complying to discretionary in relation to earthworks located within ONF's and SAF.	
	Section 3D.4.5 Non-Complying Activities	A non-complying activity status for earthworks in an ONL outside of an existing road corridor is opposed for the same reasons set out in section 3A.4.6 Non-Complying Activities	Amend 3D.4.5 Non-Complying Activities as follows: <i>Any earthworks within an Outstanding Natural Landscape identified in NFL-APP1, except within an existing road corridor, or in the National Grid Yard that do not comply with 3D.4.2.f v) or vi) is a <u>Discretionary Activity</u> Non-Complying Activity.</i>
Chapter NFL – NATURAL FEATURES AND LANDSCAPES	Natural Features and Landscapes	Powerco previously submitted on the draft Plan Change 65. Powerco's primary concern was the relationship between the provisions contained within Chapter 3 District Wide Rules (inclusive of Chapters 3A Network Utilities and 3D Earthworks) and the new Chapter Natural Features and Landscapes. The introduction text at the start of Chapter NFL – Natural Features and Landscapes is still unclear in regards to its application in relation to network utilities. It still instructs the reader to read this chapter "alongside Chapter 3A Network Utilities and Chapter 3D Earthworks". Powerco requests more clarity on the application of the provisions of this chapter in relation to those set out in Chapter 3 District Wide Rules.	Amend introductory text to NFL – Natural Features and Landscapes to provide greater clarity on how the objectives, policies and rules contained in this section apply in relation to Chapter 3A Network Utilities and Chapter 3D Earthworks, as follows: <i>This chapter must also be read alongside Chapter 3A Network Utilities and Chapter 3D Earthworks. For activities involving Network Utilities within Outstanding Natural Features and Landscapes and Significant Amenity Features the more <u>specific provisions in Chapter 3A Network Utilities apply and prevail over this chapter.</u> Earthworks associated with <u>network utilities</u> within Outstanding Natural Features and Landscapes are provided for in Chapter 3D Earthworks. <u>These provisions prevail over the provisions contained within this chapter.</u></i>

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Chapter NFL – NATURAL FEATURES AND LANDSCAPES	Natural Features and Landscapes	Powerco has assumed the intent of Chapter NFL – Natural Features and Landscapes does not apply to network utilities located within ONF’s, ONL’s and SAF’s and so has not provided submission points on it. If this understanding is incorrect and the objectives, policies and rules contained within Chapter NFL – Natural Features and Landscapes do apply to network utilities Powerco would like the opportunity to provide comment on them as they are at tension with the provisions contained within Chapters 3A Network Utilities and 3D Earthworks.	Amend introduction text as set out in the above submission point and confirm that Chapter NFL – Natural Features and Landscapes does not apply to Network Utilities. If this relief is not accepted, Powerco objects to all objectives, policies and rules in the NFL – Natural Features and Landscapes chapters, and seeks they are amended as required to appropriately and adequately provide for the establishment, maintenance, upgrading and operation of electricity distribution lines.

Attachment A

1) ONF3 - Outstanding Natural Feature - Rangitikei River

Powerco assets in area: 11KV High Voltage overhead lines (red lines) cross the river and transformers (blue triangles) are within the area.



2) ONF4 - Outstanding Natural Feature - Mangamako Gorge
Powerco assets in area: 11KV High Voltage overhead lines and transformers through area.



ONF 4 - MANGAMAKO GORGE



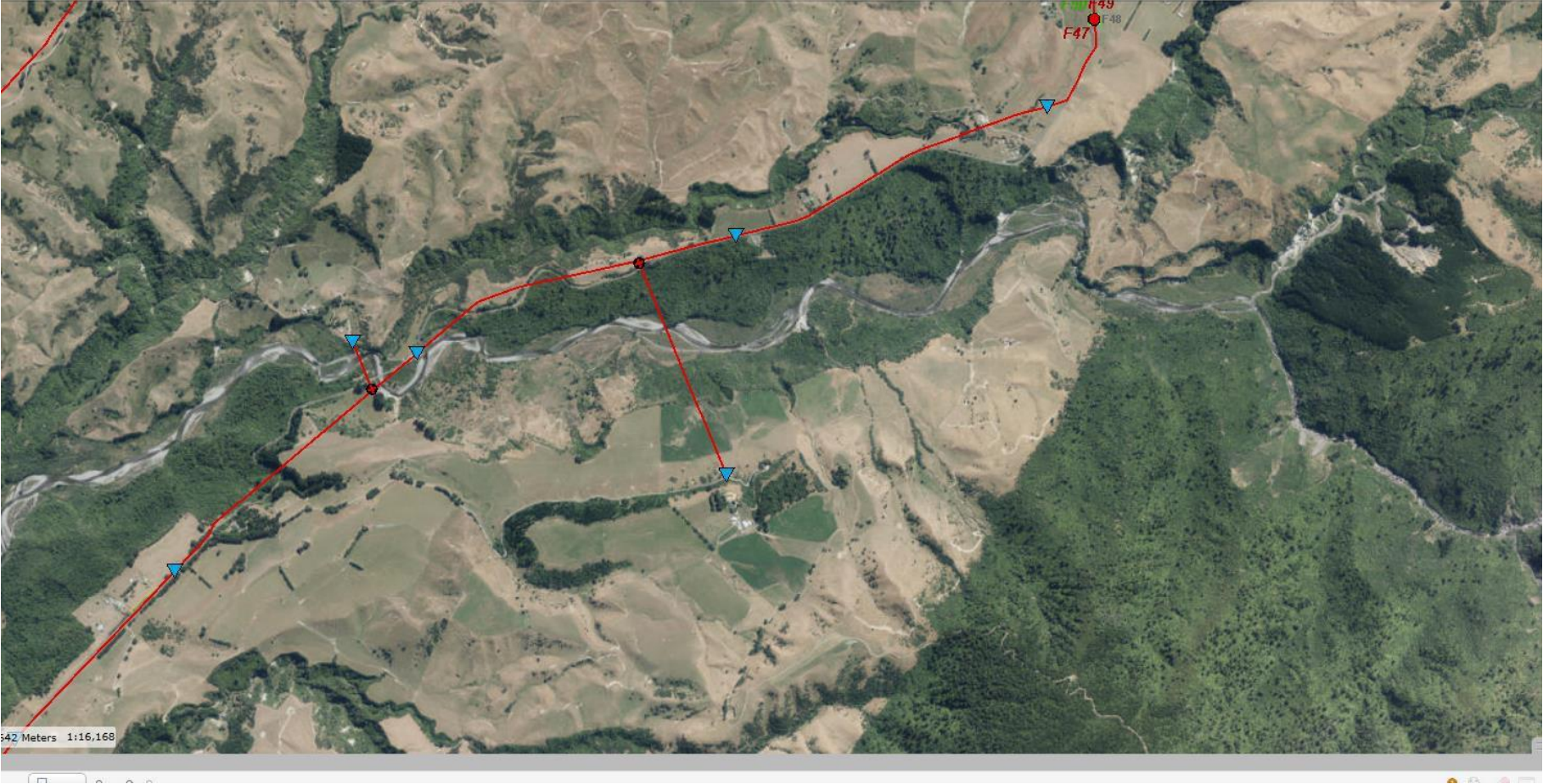
3) ONF7 - Outstanding Natural Feature – Mangoira & Mangahuia Stream
Powerco assets in area: 11KV High Voltage overhead.



ONF 7 – MANGOIRA AND MANGAHUIA STREAM



4) ONF9 - Outstanding Natural Feature - Upper Pohangina River
Powerco assets in area: 11KV High Voltage overhead lines and transformers.

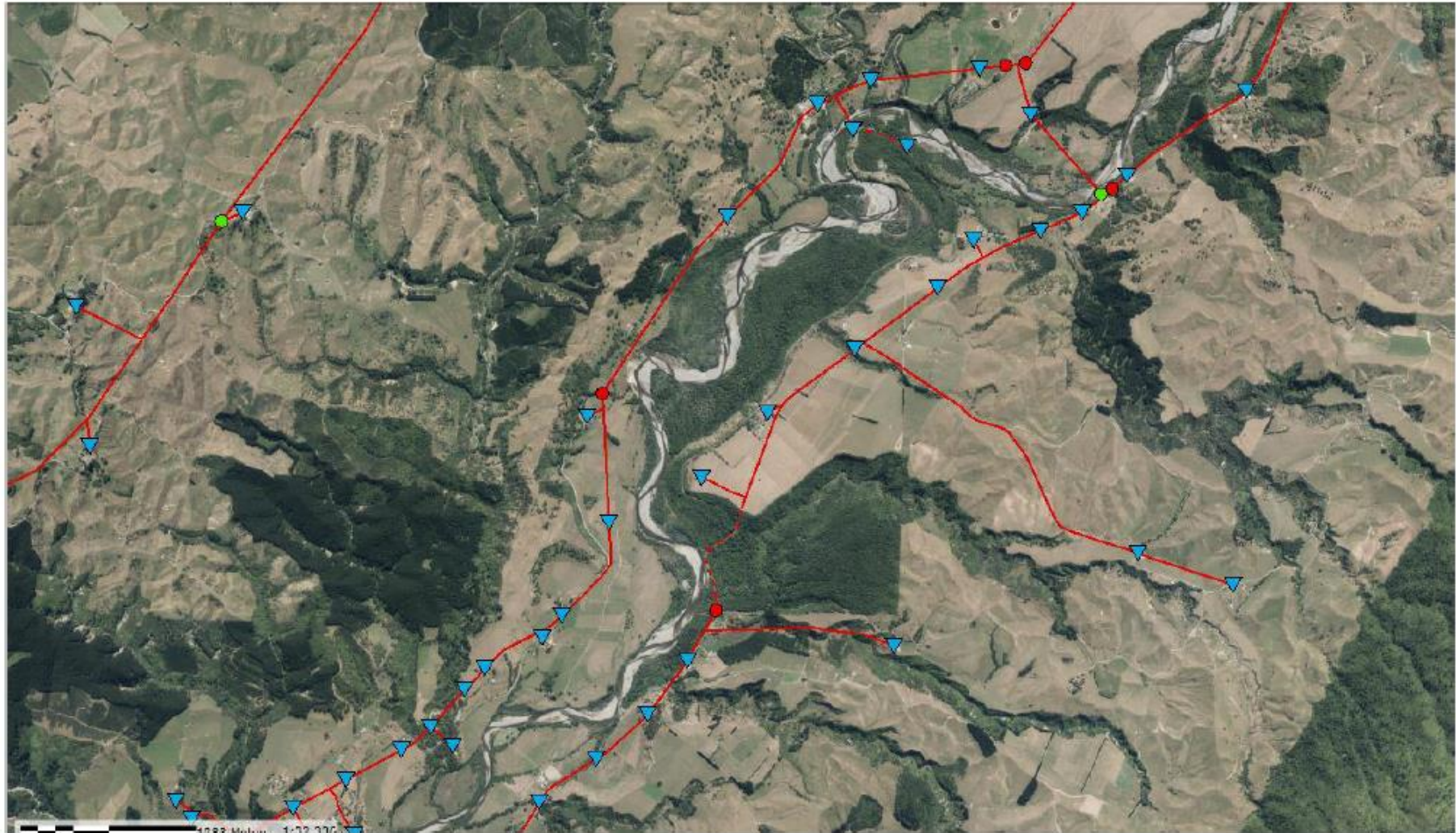


ONF 9 – UPPER PŌHANGINA RIVER



5) ONF 10 - Outstanding Natural Feature – Totara Reserve

Powerco assets in area: 11KV High Voltage overhead lines (red lines) and underground cables (red dashed lines) and transformers (blue triangles)



ONF 10 – TŌTARA RESERVE



6) ONFL 14 - Outstanding Natural Feature – Pukepuke Lagoon

Powerco assets in area: 11KV High Voltage overhead lines (red lines) and transformer (blue triangle)



ONFL 14 – PUKEPUKE LAGOON



7) SAF2 - Significant Amenity Feature – Upper Oroua River and River Valley

Powerco assets in area: 11KV High Voltage overhead lines (red lines) and transformers (blue triangles) and crosses river in two areas



8) SAF3 - Significant Amenity Feature - Makiekie Creek

Powerco assets in area: 11KV High Voltage overhead lines (red lines) and transformers (blue triangles)



SAF 3 – MAKIEKIE CREEK

