

**Submission on Proposed Timaru District Plan - He Po. He Ao. Ka Awatea.**

**Form 5 Submission on publically notified proposal for policy statement or plan, change or variation**

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Timaru District Council - Planning Unit

**Date received:** 15/12/2022

**Submission Reference Number #:**55

This is a submission on the following proposed plan (the **proposal**): Proposed Timaru District Plan - He Po. He Ao. Ka Awatea.

**Submitter:**

Alpine Energy Limited - Fabia Fox - Regulatory and Sustainability Manager

**Address for service:**

Alpine Energy Limited  
24 Elginshire Street Washdyke 7910  
New Zealand

**Email:** [fabia.fox@alpineenergy.co.nz](mailto:fabia.fox@alpineenergy.co.nz)

**Attachments:**

Alpine Energy Supporting Information - Proposed District Plan Submission.pdf

Alpine Energy Supporting Information - Proposed District Plan Submission.pdf

Alpine Energy Supporting Information - Proposed District Plan Submission 1.pdf

**I wish to be heard:** Yes

**I am willing to present a joint case:** No

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **No**

## Submission points

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### Point 55.14

**Section:** Definitions

**Sub-section:** Definitions

**Provision:**

Regionally Significant Infrastructure is:

- a. Strategic land transport network and arterial roads
- b. Timaru Airport
- c. Port of Timaru
- d. Telecommunication facilities
- e. National, regional and local renewable electricity generation activities of any scale
- f. The electricity transmission network
- g. Sewage collection, treatment and disposal networks
- h. Community land drainage infrastructure
- i. Community potable water systems
- j. Established community-scale irrigation and stockwater infrastructure
- k. Transport hubs
- l. Bulk fuel supply infrastructure including terminals, wharf lines and pipelines.

### REGIONALLY SIGNIFICANT INFRASTRUCTURE

**Sentiment:** Amend

**Submission:**

This appears to be a drafting omission within the Plan. National, regional, and local renewable electricity generation, and the transmission network are included within the definition of regionally significant infrastructure, but the electricity distribution network is not. Electricity generation infrastructure and the transmission network are of limited regional significance without the electricity distribution network to connect and support them.

This amendment would ensure that the electricity distribution network is afforded the appropriate support of Policy EI-P1 (7) – supporting Regionally Significant Infrastructure in adopting new technologies that:

- a. improve access to, and efficient use of, networks and services;
- b. allow for the re-use of redundant services and structures;
- c. increase resilience, safety or reliability of networks and services;
- d. result in environmental benefits and enhancements; or
- e. promote environmentally sustainable outcomes including green infrastructure and the increased utilisation of renewable resources.

This policy will provide necessary support for our role in enabling the electrification of the Timaru District as we transition to a zero-carbon future.

**Relief sought**

Amend the definition of Regionally Significant Infrastructure to include:

“the regional electricity distribution network.”

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## Point 55.15

**Section:** EI – Energy and Infrastructure

**Sub-section:** Objective

**Provision:**

Effective, resilient, efficient and safe [Regionally Significant Infrastructure](#) and [Lifeline Utilities](#) that:

1. provides essential and secure services, including in emergencies; and
2. facilitates local, regional, national or international connectivity; and
3. contributes to the economy and supports a high standard of living; and
4. is aligned and integrates with the timing and location of [urban development](#); and
5. enables people and communities to provide for their health, safety and wellbeing.

**Sentiment:** Support

**Submission:**

As a Lifeline Utility, and a provider of significant regional infrastructure, Alpine Energy Limited supports the Plan's objective of effective, resilient, and safe infrastructure and utilities. This objective aligns with Alpine Energy Limited's business purpose and strategy.

**Relief sought**

None

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## Point 55.16

**Section:** EI – Energy and Infrastructure

**Sub-section:** Objective

**Provision:**

The efficient operation, [maintenance](#), [repair](#), [upgrading](#) or development of [Regionally Significant Infrastructure](#) and [lifeline utilities](#) are not constrained or compromised by the adverse [effects](#) of [subdivision](#), use and development, including [reverse sensitivity effects](#).

**Sentiment:** Oppose

**Submission:**

In order to provide effective, resilient, safe, and affordable infrastructure for our communities, it is essential that our ability to operate, maintain, repair, upgrade, and develop the electricity distribution network is not constrained or compromised by the adverse effects of subdivision, use and development, including reverse sensitivity effects. We note that any additional cost imposed on Alpine Energy Limited due to constraints such as these, is ultimately borne by the community through electricity lines charges (electricity distribution costs).

**Relief sought**

None

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## Point 55.17

**Section:** EI – Energy and Infrastructure

**Sub-section:** Policies

**Provision:**

Recognise the benefits of [Regionally Significant Infrastructure](#) and [Lifeline Utilities](#) by:

1. enabling their operation, [maintenance](#), [repair](#), [upgrade](#), development; and
2. enabling their removal during an emergency; and
3. recognising their [functional needs](#) or [operational needs](#); and
4. encouraging the coordination of their planning and delivery with land use, [subdivision](#), development and urban growth so that future land use and [infrastructure](#) and [Lifeline Utilities](#) are integrated, efficient and aligned; and
5. enabling the investigation and development of new [small-scale renewable electricity generation](#) activities to support a reduction in greenhouse gas emissions and diversifying the type and/or location of electricity generation; and
6. allowing [large scale renewable generation](#) and non-renewable generation activities where the adverse [effects](#) can be minimised or are able to be remediated; and
7. supporting [Regionally Significant Infrastructure](#) in adopting new technologies that:
  - a. improve access to, and efficient use of, networks and services;
  - b. allow for the re-use of redundant services and [structures](#);
  - c. increase resilience, safety or reliability of networks and services;
  - d. result in environmental benefits and enhancements; or
  - e. promote environmentally sustainable outcomes including [green infrastructure](#) and the increased utilisation of renewable resources.

**Sentiment:** Support

**Submission:**

This policy enables Alpine Energy Limited to plan, and operate, maintain, repair, upgrade and develop the electricity distribution network in an effective, safe and affordable way to support our communities, while mitigating any adverse effects caused by the infrastructure and activities associated with it.

We note that we have submitted seeking an amendment to the definition of Regionally Significant Infrastructure to include “the electricity distribution network” – where it is currently excluded – to ensure that our network is afforded the benefits of clause 7 of this policy – supporting Regionally Significant Infrastructure in adopting new technologies that:

- a. improve access to, and efficient use of, networks and services;
- b. allow for the re-use of redundant services and [structures](#);
- c. increase resilience, safety or reliability of networks and services;
- d. result in environmental benefits and enhancements; or
- e. promote environmentally sustainable outcomes including [green infrastructure](#) and the increased utilisation of renewable resources.

**Relief sought**

None

**Point 55.18**

**Section:** EI – Energy and Infrastructure

**Sub-section:** Policies

**Provision:**

1. Ensure new incompatible activities are appropriately located or designed so they do not compromise or constrain the safe, effective and efficient operation, [maintenance](#), [repair](#), development or [upgrading](#) of any [Regionally Significant Infrastructure](#) and [lifeline utilities](#); and

2. Recognise and provide for the safe and efficient operation, [maintenance](#), [upgrading](#), removal and development of the [National Grid](#) by:
  - a. avoiding the establishment or expansion of activities sensitive to [transmission lines](#) in the [National Grid Yard](#) and avoiding [subdivision](#), use and development that may compromise the operation, [maintenance](#), [repair](#), [upgrading](#), renewal, or development of the [National Grid](#); and
  - b. providing security of supply and/or maintaining the integrity of [National Grid](#) assets; and
  - c. maintaining ongoing access to [conductors](#) and support [structures](#) for [maintenance](#) and [upgrading](#) works; and
  - d. minimising exposure to health and safety risks from the [National Grid](#); and
  - e. managing activities, as far as reasonably practicable, to avoid the potential for [reverse sensitivity effects](#) on the [National Grid](#).

**Sentiment:** Support

**Submission:**

In order to provide effective, resilient, safe, and affordable infrastructure for our communities, it is essential that the electricity distribution network is not constrained or compromised by new incompatible activities that are inappropriately located or designed, in the same way that the National Grid is protected by this policy. We note that any additional cost imposed on Alpine Energy Limited due to constraints such as these, is ultimately borne by the community through electricity lines charges (electricity distribution costs).

**Relief sought**

None

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**Point 55.19**

**Section:** EI – Energy and Infrastructure

**Sub-section:** Rules

**Provision:**

**Note:** Activities not listed in the rules of this chapter are classified as a permitted under this chapter.

Rules in [Sections A - Section F](#) of this chapter take precedence over rules in any Zone Chapter of Part 3 – Area Specific Matters - Zone Chapters. Unless otherwise specified in this chapter, the provisions of [Development Area Chapter](#), [Designation Chapter](#) and Chapters in Part 2 - District-wide Matters Chapters still apply to activities provided for in [Sections A - Section F](#) and therefore resource consent may be required by the rules in Part 2.

Rules in [Section G](#) of this chapter do not take precedence over rules in the Zones chapter. Consent may be required by rules the Part 2 - District-wide Matters Chapters and Part 3 – Area Specific Matters - Zone Chapters. Unless expressly stated otherwise by a rule, consent is required under each of those rules.

The steps plan users should take to determine which rules apply to any activity, and the status of that activity, are provided in [Part 1, HPW – How the Plan Works - General Approach](#).

**Sentiment:** Support

**Submission:**

We support the proposed Plan rules as they relate to network utilities in general. We particularly support the Plan's inclusion of the maintenance and upgrading of overhead lines and supporting structures in all zones as a permitted activity. This rule enables

cost effective management of the electricity distribution network. Our ability to continue to maintain and upgrade overhead lines (without the requirement to underground these lines) is essential to our ability to support an affordable transition to a decarbonised District.

We note that, while more aesthetically pleasing, the requirement to underground lines imposes considerable additional cost on the operation, maintenance, and development of the electricity distribution network. This cost is ultimately borne by the community through electricity lines charges or customers through connection charges. We urge Council to consider this in relation to any potential amendments to the Proposed District Plan imposing further requirements to underground lines.

**Relief sought**

None

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**Point 55.20**

**Section:** ECO – Ecosystems and Indigenous Biodiversity

**Sub-section:** Objectives

**Provision:**

**ECO-01**            **Protection of significant indigenous [biodiversity](#)**

**Sentiment:** Oppose

**Submission:**

Alpine Energy Limited recognises the importance of protecting, maintaining, and enhancing indigenous biodiversity within the Timaru District. We look forward to engaging with Council to ensure our work across the District is able to support these objectives.

**Relief sought**

None

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**Point 55.21**

**Section:** ECO – Ecosystems and Indigenous Biodiversity

**Sub-section:** Objectives

**Provision:**

**ECO-02**            **[Maintenance](#) and enhancement of indigenous [biodiversity](#)**

**Sentiment:** Support

**Submission:**

Alpine Energy Limited recognises the importance of protecting, maintaining, and enhancing indigenous biodiversity within the Timaru District. We look forward to engaging with Council to ensure our work across the District is able to support these objectives.

**Relief sought**

None

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**Point 55.1**

**Section:** ECO – Ecosystems and Indigenous Biodiversity

Sub-section: Rules

Provision:

1

Activity status: Permitted

Activity status where compliance not achieved:  
Non-complying

[Significant  
Natural Areas  
Overlay](#)

Where

**PER-1**

The vegetation to be cleared is causing an imminent danger to human life, [structures](#), or utilities and the clearance is undertaken in accordance with advice from a suitably [qualified arborist](#); or

**PER-2**

The clearance is carried out by the relevant [Road](#) Requiring Authority:

1. to install road safety assets for the purpose of reducing traffic risk within the [road](#) corridor, and the clearance is less than 5m<sup>2</sup> within a single [SNA](#); or
2. to maintain existing roadside drainage; or

**PER-3**

The vegetation clearance is carried out by Ngāi Tahu whanui for the purposes of [mahika kai](#) or other customary uses, where it has been certified by Te Runanga o Arowhenua that the activity will meet tikanga protocol (Note: Te Runanga o Arowhenua will notify the Timaru District Council prior to such activities occurring); or

**PER-4**

The vegetation clearance is carried out to remove material infected by unwanted organisms as declared by the Minister for Primary Industries Chief Technical Officer, or an emergency declared under the **Biosecurity Act 1993**; or

**PER-5**

The clearance is unavoidable in the course of removing pest plants and pest animals in accordance with any regional pest management plan or the **Biosecurity Act 1993**, or where this occurs as part of indigenous [biodiversity](#) restoration or enhancement.

**Sentiment:** Amend

**Submission:**

Our electricity distribution network includes 69 poles and 44 overhead conductors located within SNAs across the Timaru District and existing vehicle access tracks to these assets. From time to time, the maintenance, repair and upgrading of these existing poles and lines requires clearance of vegetation from the immediate vicinity of poles (for vehicle and equipment access) and clearance of vegetation to maintain existing vehicle access tracks. This rule, and a later rule – ECO-R3 – permits the clearance of indigenous vegetation by the relevant Road Requiring Authority to install road safety assets and to maintain existing roadside drainage, and by Transpower New Zealand Limited to provide for the operation, maintenance, or repair of the National Grid. Any adverse impacts of indigenous vegetation clearance caused by our activities will be of the same order as road requiring authorities and the National Grid and will be mitigated by our vegetation management plans and through our compliance with the Electricity (Hazards from Trees) Regulations 2003.

These rules support Policy ECO-P2 to allow indigenous vegetation clearance where it is appropriate for health and wellbeing. We submit therefore that, in the same way as Road Requiring Authorities and Transpower, our ability to operate, maintain, and repair the electricity distribution network across the Timaru District is essential for the health and wellbeing of the community.

Please see attached supporting images of our network assets within SNAs.

**Relief sought**

We are seeking an amendment to this rule to allow a new permitted activity as detailed below.

The vegetation clearance is to provide for the operation, maintenance or upgrading of the electricity distribution network, including maintenance of existing vehicle access tracks to electricity distribution support structures, and is carried out in accordance with advice from a suitably qualified arborist.

This amendment is consistent with the permitted activities of Road Requiring Authorities and Transpower and supports the proposed amendment to ECO-P2, recognising the health and wellbeing benefits to the Timaru District of a safe, reliable, and affordable electricity distribution network. It also supports the objectives and policies included in the Energy and Infrastructure Chapter of this Plan.

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**Point 55.2**

**Section:** ECO – Ecosystems and Indigenous Biodiversity

**Sub-section:** Policies

**Provision:**

**ECO-P2** Appropriate [indigenous vegetation clearance](#) in [significant natural areas](#)

**Sentiment:** Amend

**Submission:**

Our network includes 69 poles and 44 overhead conductors located within SNAs across the District. Our ability to operate, maintain and replace the electricity distribution network across the Timaru District is essential for the health and wellbeing of the community. From time to time, the maintenance, repair and upgrading of these existing poles and lines requires clearance of vegetation from the immediate vicinity of poles (for vehicle and equipment access). The policy, as proposed, enables the clearance of indigenous vegetation for the operation, maintenance or repair of the National Grid and public roads. We submit that the electricity distribution network should be afforded the same ability. Any adverse impacts of indigenous vegetation clearance caused by our activities will be of the same order as road requiring authorities and the National Grid and will be mitigated by our vegetation management plans. We are also submitting seeking an amendment to EOC-R1 to include clearance of indigenous vegetation for the maintenance and repair of electricity distribution poles and lines, including maintenance of existing vehicle access tracks to be a permitted activity. This amendment also supports the objectives and policies included in the Energy and Infrastructure Chapter of this Plan.

Please see attached supporting images of our network assets within SNAs.



## Relief sought

Alpine Energy Limited seeks an amendment to clause 5 of the policy as indicated below:

5. for the operation, maintenance or repair of the National Grid, **electricity distribution network** and public roads.
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### Point 55.3

**Section:** NFL – Natural Features and Landscapes

**Sub-section:** Rules

**Provision:**

**NFL-R3** [Network utilities](#) including associated [earthworks](#)

**Sentiment:** Amend

**Submission:**

Alpine Energy Limited supports the rule permitting the maintenance, upgrading or removal of existing network utilities within the Geraldine Downs Visual Amenities Landscape overlay. Our ability to maintain and upgrade network utilities without being required to underground these lines is essential to providing affordable infrastructure and services to our communities. We note that, while more aesthetically pleasing, the requirement to underground lines imposes considerable additional cost on the operation, maintenance, and development of the electricity distribution network. This cost is ultimately borne by the community through electricity lines charges or customers through connection charges. Where possible, Alpine Energy Limited seeks to minimise unnecessary cost to customers and the community, and we seek Council's support in these efforts. The ability to upgrade existing overhead assets is essential for our ability to support network growth and the electrification of the District into the future.

While we support the rule permitting the installation of new or upgrading of underground network utilities, we are seeking an amendment to the rule to permit the installation of new overhead network utilities and structures. While we accept the objectives of this chapter is to protect visual amenity landscapes, we believe the significant additional cost of undergrounding all new electricity lines within the Geraldine Downs Visual Amenity Landscape overlay, particularly as it relates to any significant network load increase is an unintended consequence of this rule. This cost may be prohibitive to customers wishing to connect to the network or impose undue financial burden on the community through electricity lines changes. We urge Council to consider the financial implications of the requirement to underground any new lines within the Geraldine Downs area. Our proposed amendment also supports the objectives and policies included in the Energy and Infrastructure Chapter of this Plan.

## Relief sought

Amend NFL-R3 PER-2 as below:

The installation of new or upgrading of **underground** network utilities where:

1. within the ONF and ONL overlays, the installation does not include more than 1,000m<sup>2</sup> of temporary trenching / earthworks; and
  2. within the VAL overlay, the installation does not include more than 1,500m<sup>2</sup> of temporary trenching / earthworks in any 12-month period; and
  3. the installation does not require the clearance of any indigenous vegetation.
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### Point 55.4

**Section:** FDA – Future Development Area

**Sub-section:** Objectives

**Provision:**

[Land](#) in the Future Development Area Overlay remains available for future urban or rural lifestyle development.

**Sentiment:** Support

**Submission:**

Alpine Energy Limited supports the District Plan providing clear direction for future urban and rural lifestyle development across the Timaru District. As an infrastructure provider and an enabler of development in the District, it is essential that our own long-term planning is informed by clear direction from Council regarding future land use and development. The locations of the proposed FDAs are supported due to their proximity to existing infrastructure, enabling us to continue to plan for and provide a cost effective and resilient electricity distribution network for our communities.

**Relief sought**

None

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**Point 55.5**

**Section:** FDA – Future Development Area

**Sub-section:** Objectives

**Provision:**

**FDA-02                      Development within the Future Development Area**

**Sentiment:** Support

**Submission:**

Alpine Energy Limited supports the District Plan providing clear direction for future urban and rural lifestyle development across the Timaru District. As an infrastructure provider and an enabler of development in the District, it is essential that our own long-term planning is informed by clear direction from Council regarding future land use and development. The locations of the proposed FDAs are supported due to their proximity to existing infrastructure, enabling us to continue to plan for and provide a cost effective and resilient electricity distribution network for our communities.

**Relief sought**

None

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**Point 55.6**

**Section:** FDA – Future Development Area

**Sub-section:** Objectives

**Provision:**

Unanticipated [urban development](#) outside of the Future Development Area Overlay or out of sequence development is only considered when significant [development capacity](#) is provided and it contributes to a well-functioning urban [environment](#).

**Sentiment:** Support

**Submission:**

Alpine Energy Limited supports the District Plan providing clear direction for future urban and rural lifestyle development across the Timaru District. As an infrastructure provider and an enabler of development in the District, it is essential that our own long-

term planning is informed by clear direction from Council regarding future land use and development. The locations of the proposed FDAs are supported due to their proximity to existing infrastructure, enabling us to continue to plan for and provide a cost effective and resilient electricity distribution network for our communities.

**Relief sought**

None

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**Point 55.7**

**Section:** FDA – Future Development Area

**Sub-section:** Policies

**Provision:**

Urban and rural lifestyle development within the Future Development Area overlay is required to:

1. be undertaken in accordance with sequence set out in [SCHED15 - Schedule of Future Development Areas](#) in order to avoid adverse [effects](#) on urban consolidation; and
2. be developed in accordance with the anticipated land use set out in [SCHED15 - Schedule of Future Development Areas](#); and
3. submit a plan change that includes a Development Area Plan prepared in accordance with [FDA-P4](#).

**Sentiment:** Support

**Submission:**

The requirements of this policy ensure that Alpine Energy Limited is able to include Future Development Areas within our own Network Development Plans and Asset Management Plans with a greater degree of confidence.

**Relief sought**

None

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**Point 55.8**

**Section:** FDA – Future Development Area

**Sub-section:** Policies

**Provision:**

Timaru District Council will prepare Development Area Plans for the future development areas indicated as priority areas in [SCHED15 - Future Development Area](#).

**Sentiment:** Support

**Submission:**

We support Timaru District Council preparing Development Area Plans for the priority areas included in Schedule 15. We look forward to early engagement with Council in developing these Plans.

**Relief sought**

None

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## Point 55.9

**Section:** FDA – Future Development Area

**Sub-section:** Policies

### Provision:

Require Development Area Plans to provide for a comprehensive, coordinated and efficient development that addresses the following matters:

1. the ability to manage any potential conflict between existing activities and future activities;
2. the type, location and density of development on the [land](#) to ensure it is suitable for the area;
3. the benefits of urban consolidation/intensification to support a quality compact urban form;
4. the topography and natural and physical constraints of the [site](#), including [natural hazards](#) and areas of contamination;
5. the future servicing needs of the area and the provision of adequate, coordinated and integrated [infrastructure](#) to serve those needs, including using [water sensitive design](#) to manage [stormwater](#);
6. whether staging is appropriate to ensure development occurs logically;
7. the integration of the area with surrounding areas and the way any conflict between areas is to be managed;
8. the provision of multi-nodal transport links (including [active transport](#) links) and connected transport networks that allow ease of movement to, from and within the area;
9. the provision and integration of accessible open space networks, parks and [esplanade strips](#);
10. the potential impact of development on any cultural, spiritual and/or historic values and interests or associations of importance to [mana whenua](#), and the outcomes of any consultation with and/or cultural advice provided by [mana whenua](#), including with respect to:
  - a. opportunities to incorporate matauranga Māori principles into the design and/or development of the [structure](#) plan area;
  - b. opportunities for [mana whenua](#)'s relationship with ancestral lands, [water](#), [sites](#), [wāhi tapu](#) and other [taoka](#) to be maintained or strengthened; and
  - c. options to avoid, remedy or mitigate adverse [effects](#);
11. the [maintenance](#) or enhancement of identified natural features, [waterbodies](#) and/or [indigenous vegetation](#) or habitats of indigenous fauna;
12. opportunities for the provision of business and [retail activities](#) that are compatible and complimentary to the planned growth and will serve the needs of the new community;
13. how good urban design principles have informed the design.

**Sentiment:** Amend

### Submission:

It is essential that these Development Area Plans consider infrastructure capacity issues related to development, noting that capacity issues may extend beyond the geographic bounds of particular development area. Early engagement from Council and developers with Alpine Energy Limited, through Development Area Plans, will help mitigate any unforeseen network capacity issues (especially in relation to the electricity distribution network). By explicitly including electricity distribution network capacity considerations in this policy, the District Plan will enable more comprehensive, coordinated, and efficient development.

### Relief sought

We seek an amendment to FDA-P4 (5) as indicated below:

5. “the future servicing **and electricity distribution network capacity** needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs, including water sensitive design to manage stormwater”

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## Point 55.10

**Section:** FDA – Future Development Area

**Sub-section:** Policies

**Provision:**

Avoid unanticipated [urban development](#) outside the Future Development Area Overlay and out of sequence development within the Development Area Overlay unless:

1. significant [development capacity](#) is provided having regard to:
  - a. the zoning, objectives, policies, rules and overlays that apply in the relevant proposed or operative **RMA** planning documents; and
  - b. provision of adequate development [infrastructure](#) to support the development of the [land](#) for housing or business use; and
2. there is robust evidence that demonstrates that the development contributes to a well-functioning urban [environment](#) in that:
  - a. for residential development, it enables a variety of homes that: meets the needs in terms of type, price and location of different households and enables Māori to express their cultural traditions and norms;
  - b. for business development, it has or will enable a variety of [sites](#) that are suitable for different business sectors in terms of location and [site](#) size;
  - c. supports, and limits as much as possible adverse impacts on, the competitive operation of [land](#) and development markets;
  - d. has good accessibility for people to employment, education, commercial, community, open space and transport services including by way of public or [active transport](#);
  - e. is consistent with the urban form strategic objectives and [UFD-01](#);
  - f. supports reductions in greenhouse gas emissions and is resilient to the current and future [effects](#) of climate change;
  - g. it will not affect the feasibility, affordability and deliverability of planned growth within existing zoned areas, development area plans or the future development area overlay;
  - h. it can be demonstrated that there is commitment to and capacity available for delivering the development within a reasonable timeframe;
  - i. in cases where the development is proposing to replace a planned land use with an unanticipated land use, whether it can be demonstrated that the proposal will not result in a short, medium or long-term shortfall in residential or business [land](#);
  - j. the development protects and provides for human health;
  - k. for residential development, the development would contribute to the affordable housing stock within the district;
  - l. the development does not compromise the efficiency, affordability or benefits of existing and/or proposed [infrastructure](#) in the district;
  - m. the development can be serviced without undermining committed [infrastructure](#) investments made by local authorities or central government (including **Waka Kotahi NZ** Transport Agency);
  - n. the development demonstrates efficient use of local authority and central government financial resources, including prudent local authority debt management, demonstrating the extent to which cost neutrality for public finances can be achieved;
  - o. there is compatibility of any proposed land use with adjacent [land](#) uses including planned [land](#) uses;
  - p. the development avoids areas identified as having significant natural or cultural values, or that is subject to significant [natural hazards](#);
  - q. the plan change includes a comprehensive Development Area Plan prepared in accordance with [FDA-P4](#); and
3. it is well connected along transport corridors; and
4. it meets any criteria for unanticipated out of sequence development in the **Regional Policy Statement**.

**Sentiment:** Amend

**Submission:**

The requirements of this policy ensure that Alpine Energy Limited is able to include Future Development Areas within our own Network Development Plans and Asset Management Plans with a greater degree of confidence. It also ensures that the provision of adequate development infrastructure, including our electricity distribution network capacity, is appropriately considered.

We seek an amendment to FDA-P5 (2)(m) to require any development to provide robust evidence that our network investments will not be undermined. As with local authorities and central government, it is essential that future development does not undermine our committed infrastructure investments. Any negative impact on our infrastructure investments due to unanticipated or out of sequence development will ultimately be born by our shareholders, customers, and community. Including lifeline utilities, like electricity distribution networks, within this clause will help mitigate future development uncertainty for our own planning, and support our ability to provide efficient and affordable infrastructure.

## Relief sought

We seek the following amendment to the policy:

- m. the development can be service without undermining committed infrastructure investments made by local authorities, **lifeline utility providers** or central government (including Waka Kotahi NZ Transport Agency).
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### Point 55.11

**Section:** SCHED15 – Schedule of Future Development Areas

**Sub-section:** SCHED15 – Schedule of Future Development Areas

**Provision:**

FDA12 FDA12 - Sir Basil Arthur Park Future Development Area - Industrial Development	General Industrial Zone	Priority area - 2 years
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**Sentiment:** Support

**Submission:**

Alpine Energy Limited supports Council providing clear direction for future industrial development in the Washdyke area. As an infrastructure provider and an enabler of industrial development, it is essential that our own long-term planning is informed by clear direction from Council. The locations of these FDAs are supported due to their proximity to existing infrastructure and will enable Alpine Energy Limited to continue to plan and provide a cost effective and resilient network for our communities.

We note the location of Coastal Hazard overlays (Coastal Erosion and Seawater Inundation) in relation to existing industry at Washdyke. We support the Plan's recognition of the need to minimise the risk due to climate change impacts on future coastal development by providing future development areas outside of these coastal hazard areas.

We encourage Timaru District Council to undertake early engagement with Alpine Energy Limited regarding any Development Area Plans to ensure we can support efficient, resilient, and affordable infrastructure development planning for our communities.

## Relief sought

None

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### Point 55.12

**Section:** SCHED15 – Schedule of Future Development Areas

**Sub-section:** SCHED15 – Schedule of Future Development Areas

**Provision:**

FDA13 FDA13 - Seadown Road Future Development Area - Industrial Development	General Industrial Zone	Future area - beyond 10 years
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**Sentiment:** Support

**Submission:**

Alpine Energy Limited supports Council providing clear direction for future industrial development in the Washdyke area. As an infrastructure provider and an enabler of industrial development, it is essential that our own long-term planning is informed by clear direction from Council. The locations of these FDAs are supported due to their proximity to existing infrastructure and will enable Alpine Energy Limited to continue to plan and provide a cost effective and resilient network for our communities.

We note the location of Coastal Hazard overlays (Coastal Erosion and Seawater Inundation) in relation to existing industry at

Washdyke. We support the Plan's recognition of the need to minimise the risk due to climate change impacts on future coastal development by providing future development areas outside of these coastal hazard areas.

We encourage Timaru District Council to undertake early engagement with Alpine Energy Limited regarding any Development Area Plans to ensure we can support efficient, resilient, and affordable infrastructure development planning for our communities.

**Relief sought**

None

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**Point 55.13**

**Section:** SCHED15 – Schedule of Future Development Areas

**Provision:**

**SCHED15 – Schedule of Future Development Areas**

**Sentiment:** Support

**Submission:**

Alpine Energy Limited supports Council providing clear direction for future residential development in the Timaru area. As an infrastructure provider and an enabler of residential development, it is essential that our own long-term network planning is informed by clear direction from Council. The locations of these FDAs is supported due to

**Relief sought**

None

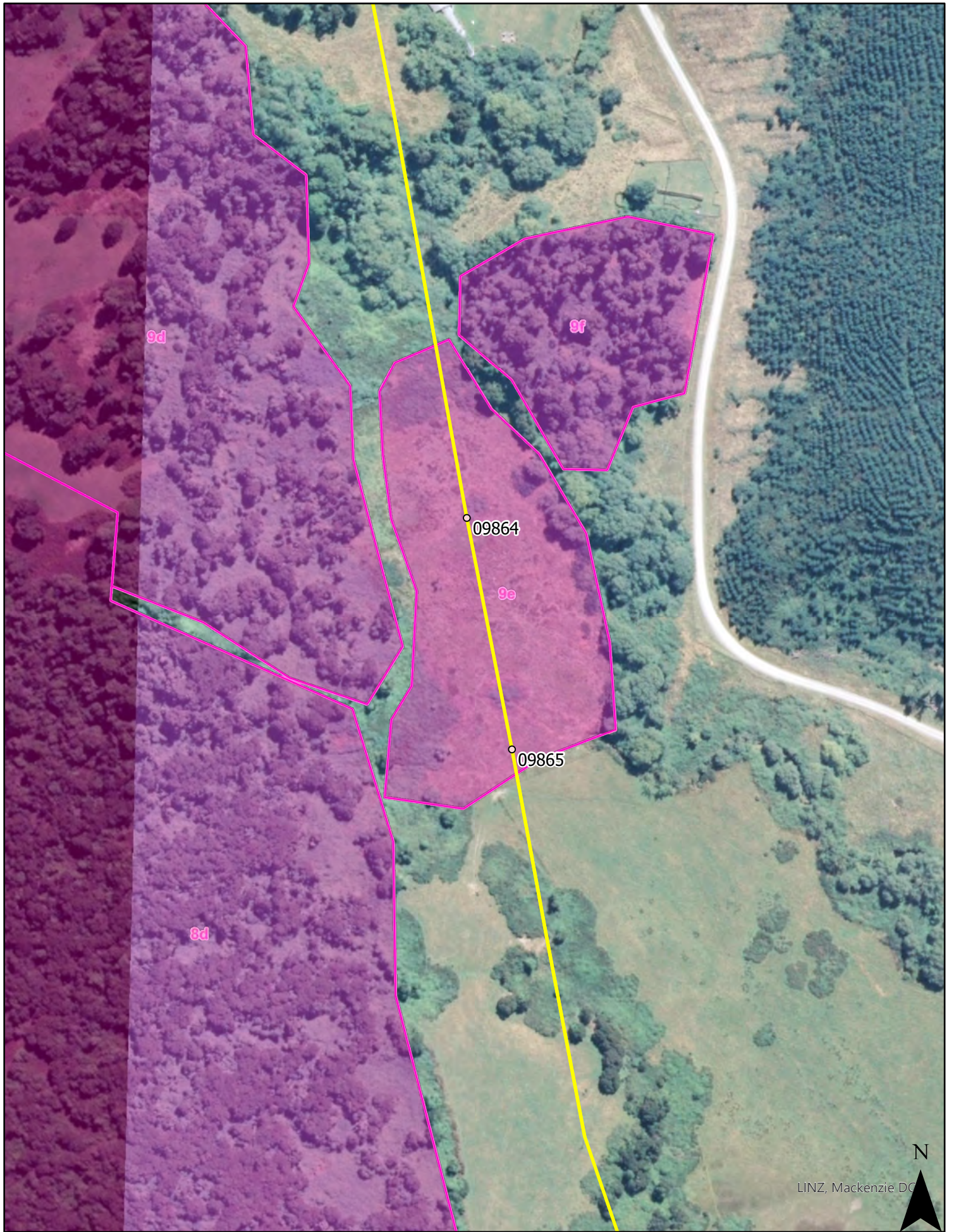
# **Alpine Energy Limited**

## **Submission to Proposed Timaru District Plan**

### **Ecosystems and Indigenous Biodiversity Chapter**

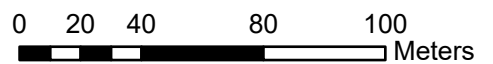
**Supporting Information: Maps showing  
sample of Alpine Energy Limited assets  
intersecting Significant Natural Areas**



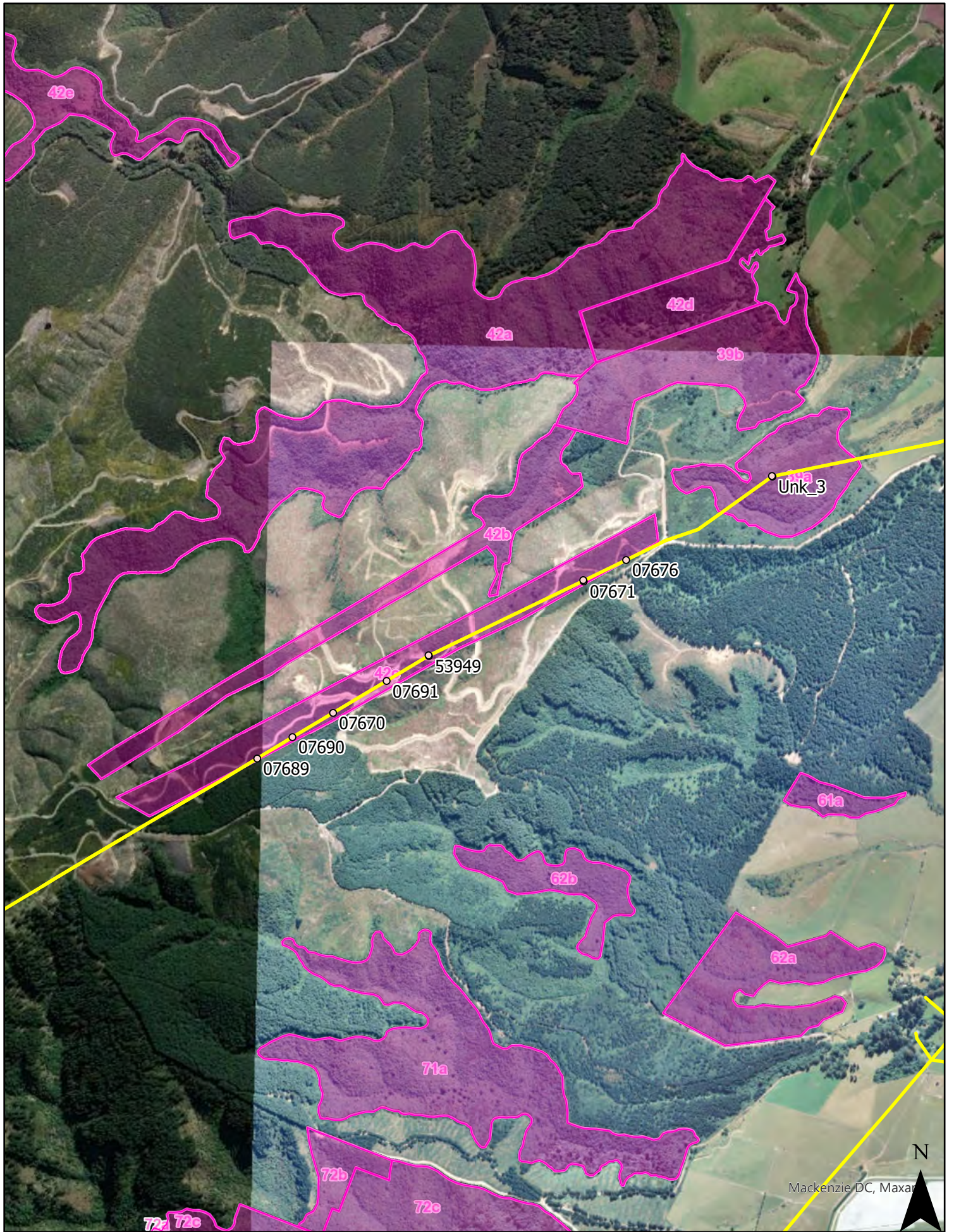


### Significant Natural Area Site: 351a

- Pole
- OverHead Conductor
- Significant Natural Areas

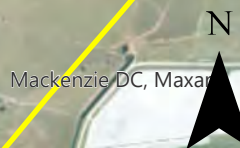


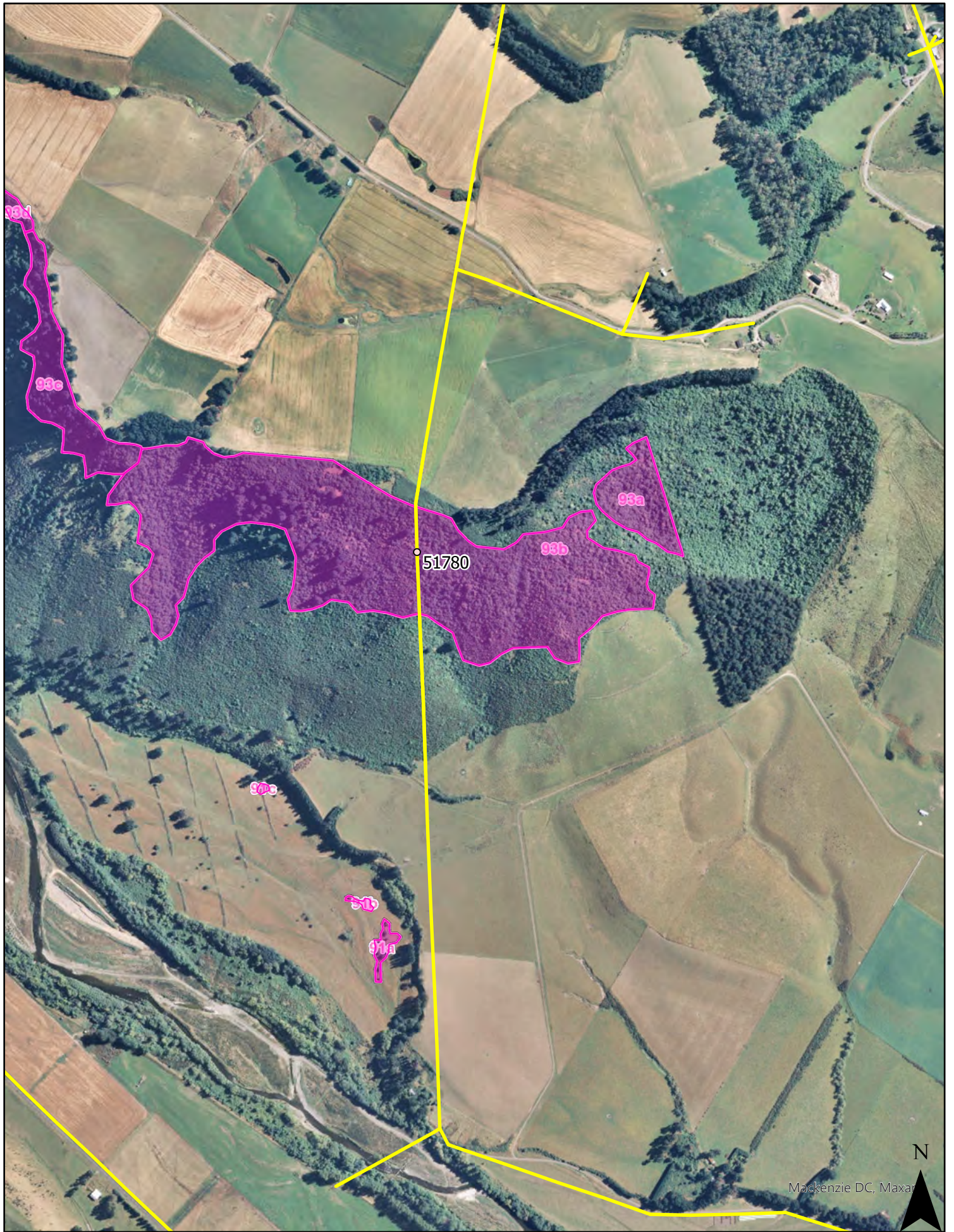
LINZ, Mackenzie DC



## Significant Natural Area Site: 9e

- Pole
- OverHead Conductor
- █ Significant Natural Areas

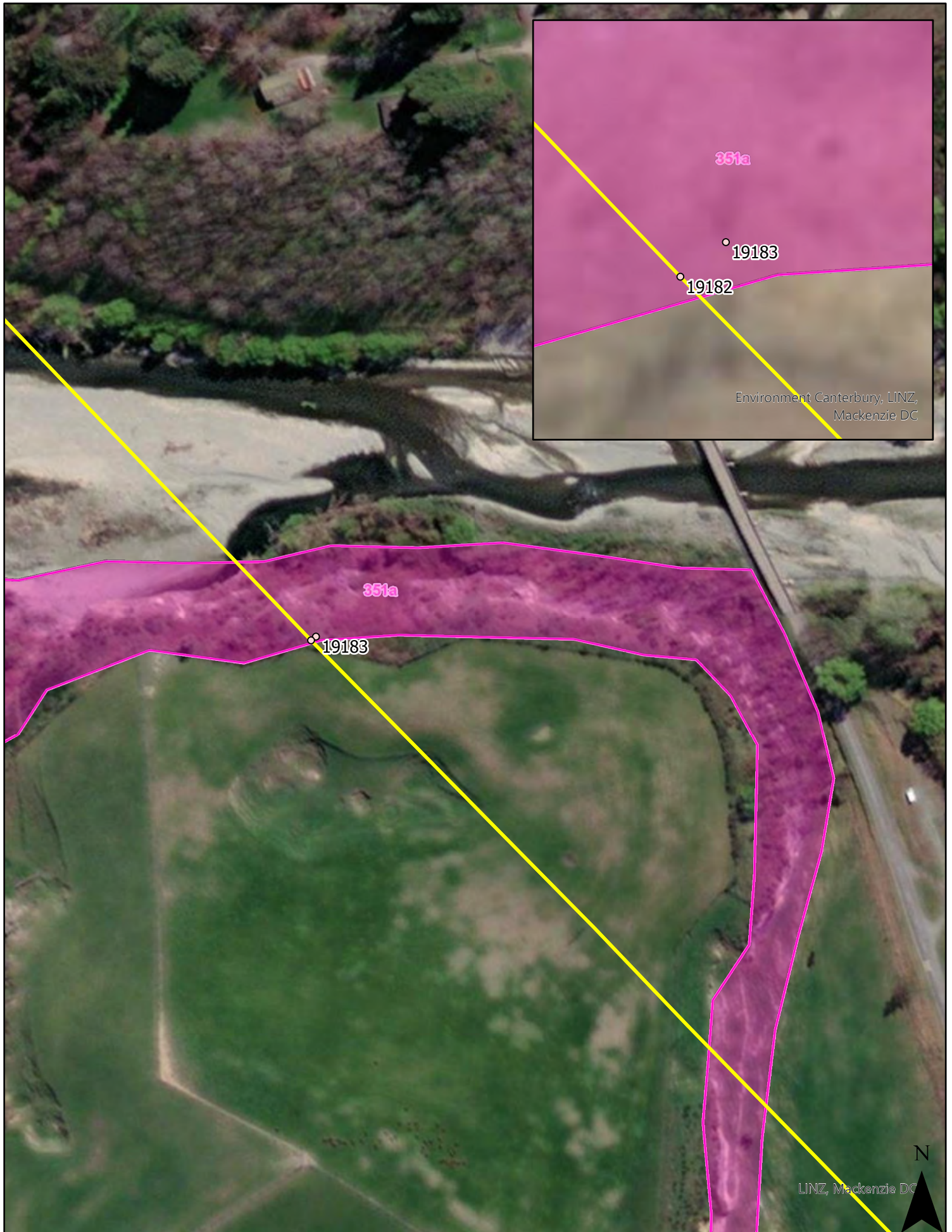




### Significant Natural Area Site: 93b

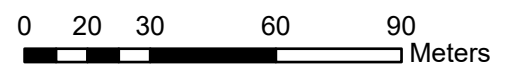
- Pole
- OverHead Conductor
- Significant Natural Areas





## Significant Natural Area Site: 351a

- Pole
- OverHead Conductor
- Significant Natural Areas





### Significant Natural Area Site: 731

- Pole
- OverHead Conductor
- Significant Natural Areas





### Significant Natural Area Site: 938a and 937b

- Pole
- OverHead Conductor
- Significant Natural Areas

