


**From:** [Simon Peirce](#)  
**To:** [RPS](#)  
**Cc:** [Joanne Dowd](#); [Bridget Irving](#)  
**Subject:** PORPS Further Submission - Aurora Energy Limited  
**Date:** Friday, 12 November 2021 10:08:33 a.m.  
**Attachments:** [image002.png](#)  
[Aurora Energy Limited Further Submission on PRPS21.pdf](#)

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Hello,

Please find **attached**, for filing, a further submission on the Proposed Otago Regional Policy Statement 2021 on behalf of Aurora Energy Limited.

Kind regards,

	<p><b>Simon Peirce</b> Senior Solicitor</p> <p>DDI 03 2653423   <a href="mailto:simon.peirce@gallawaycookallan.co.nz">simon.peirce@gallawaycookallan.co.nz</a></p> <p>GALLAWAY COOK ALLAN LAWYERS Level 2, 123 Vogel Street   P O Box 143, Dunedin 9054, NZ   Ph 03 477 7312   Fax: 03 477 5564</p> <p><a href="http://www.gallawaycookallan.co.nz">www.gallawaycookallan.co.nz</a></p>
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# Further Submission by Aurora Energy Limited

Proposed Otago Regional Policy Statement 2021

**12 November 2021**

## FORM 6

### FURTHER SUBMISSION IN SUPPORT OF, AND IN OPPOSITION TO VARIOUS SUBMISSIONS ON PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

**To:** Otago Regional Council  
Private Bag 1954  
**DUNEDIN**

**Submission on:** Proposed Otago Regional Policy Statement (**PRPS21**)

**Name:** Aurora Energy Limited

**Address:** PO Box 1404  
**DUNEDIN**

## 1 Introduction

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Aurora Energy Limited (**Aurora Energy**) is the owner and operator of an electricity distribution network in Dunedin, Central Otago and the Queenstown Lakes District. This network carries electricity from the National Grid to more than 90,000 homes and businesses. Aurora owns substations, lines and cables located in public road reserve, as well as on private property. In addition to the distribution network, Aurora has the capacity to own and operate high voltage (up to 110kV) transmission lines, and associated structures in future, and may be required to do so as regional electricity demand grows.

For these reasons, the basis upon which Aurora Energy makes this further submission is that it has an interest in PRPS21 that is greater than the public generally.

Aurora Energy made an original submission on PRPS21 seeking a suite of relief that seeks to better manage, enable, protect and provide for its electricity network to support the health and wellbeing of the Otago Region.

## 2 Further Submission

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Aurora Energy makes this further submission in support of and opposition to various original submissions on PRPS21. The various submission points that Aurora Energy supports and/or opposes are set out at **Appendix 1**, the decision that is sought.

Aurora Energy **wishes to be heard** in support of its further submission.

If other infrastructure providers make similar submissions, Aurora Energy **will consider presenting a joint case** with them at a hearing.

Joanne Dowd

**Resource Planning, Property & Environmental Manager**

**Dated 12 November 2021**

**Address for Service:**

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## APPENDIX 1: FURTHER SUBMISSION

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
1.	Dunedin City Council	00139.026	IM – P2	<p>Where there are clear conflicts between RPS requirements amend so that there is clear guidance within the policy wording on how these should be managed (see general comments). For example: In giving effect to this RPS, decision-makers should consider:</p> <ol style="list-style-type: none"> <li>(1) All provisions relevant to the issue or decision,</li> <li>(2) if multiple provisions are relevant, consider the provisions together and apply relatively weight to them according to the terms in which they are expressed, and</li> <li>(3) notwithstanding the above, all provisions must be interpreted and applied to achieve the integrated management objectives IM – O1 to IM – O4.</li> </ol> <p>However, with additional guidance on weighting here it is essential that the weight of policy language is carefully considered and the comments from the DCC with respect to policy wording should be considered.</p>	<p>Aurora <b>supports</b> adding clarity and guidance on issues of weighting with respect to various sections of PRPS21. Aurora has sought general relief seeking to provide a carve out relevant to electricity distribution infrastructure such that the provision contained within the infrastructure topic apply over other topics, for example coastal environment and landscapes.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
2.	Queenstown Lakes District Council	00138.008	IM – P2	<p>That the 'decision priority' framework in IM – P2 be limited to decision made on freshwater/those matters managed under the NPSFM 2020.</p>	<p>Aurora <b>supports</b> refining the decision priority framework to those matters over which the NPSFM2020 apply – i.e. matters of freshwater management. NPSFM20 does not justify applying a blanket priority framework approach to all matters outside of freshwater management, such as infrastructure in ONLs.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
3.	Dunedin City Council	00139.027	IM – P2	<p>Amend or add a new policy to reflect Part 2 of the RMA and clarify how 'long-term life-supporting capacity and mauri of the natural environment' will be considered when conflicts arise.</p> <p>Amend to instead of creating a hierarchy between the natural environment and people, consider an approach which better reflects part 2 of the RMA which allows a focus on providing for human wellbeing but within environmental limits and in a way which maintains long-term life-supporting capacity and mauri of the natural environment.</p>	<p>Aurora <b>supports</b> this general relief which seeks to reflect Part 2 of the RMA as opposed to reflecting the exposure draft of the Natural and Built Environments Act.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
4.	Horticulture New Zealand	00236.036	IM – P2	<p>Delete policy or amend to address the following:</p> <ul style="list-style-type: none"> <li>• The policy as drafted goes much further than this intension [s32 assessment, para 218]. It goes further than the NPSFM2020 which in Objective 1 puts the health and well-being of water bodies and freshwater ecosystems as the first priority, not the long-term life-supporting capacity and mauri of the natural environment.</li> <li>• The proposed RPS does not contain rules, decisions are not triggered by the RPS. It is therefore inappropriate to include 'decision making under the RPS shall' in the policy.</li> </ul> <p>The policy as drafted ignores the physical environment which is also integral to sustainable management (section 5(1) of the RMA). The policy is therefore inconsistent with both the NPSFM 2020 and the sustainable management purpose of the RMA.</p>	<p>Aurora <b>supports</b> the relief sought on the basis that provision IM – P2 goes beyond the matters contemplated by NPSFM 2020.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
5.	OWRUG	00235.064	IM – P4	Amend as follows; <del>protects</del> <u>has regard to</u> their intrinsic values,	Aurora <b>supports</b> the relief sought on the basis that there is no direction in Part 2 of the RMA to protect the intrinsic values of ecosystems. Until such direction is provided in forthcoming legislation or higher order instruments, then the extent to which the intrinsic values are to be assessed should be at a level consistent with Part 2 of the RMA.  Aurora seeks the relief be <b>allowed</b> .
6.	OWRUG	00235.071	IM – P14	Delete or amend as follows: Preserve opportunities for future generations by <u>when preparing Regional and District Plans</u> ; (1) identifying limits to <del>both growth and adverse effects of human activities</del> beyond which the environment will be degraded, requiring that activities occur within those limits, <del>are established in places, and carried out in ways, that are within those limits and are compatible with the natural capabilities and capacities of the resources they rely on,</del> and ...	Aurora <b>supports</b> simplifying and focusing IM-P14 by simply setting out that limits will be set and that activities must occur within those limits. The matters sought to be removed appear to be extraneous to the intent of the provision.  Aurora <b>seeks</b> the relief be <b>allowed</b> .
7.	Kāi Tahu ki Otago / Aukaha	00226.114	AIR – O1	Amend as follows: Ambient air quality provides for the <del>health and well-being of the people of Otago, amenity and mana whenua values, and the life-supporting capacity of ecosystems.:</del> (1) <u>the life-supporting capacity of ecosystems,</u> (2) <u>mana whenua values,</u> (3) <u>the health and well-being of the people of Otago, and amenity</u>	Aurora <b>supports</b> the relief which seeks to reframe the objective in a more coherent manner.  Aurora seeks the relief be <b>allowed</b> .
8.	Ravensdown Limited	00121.030	AIR – O2	Amend as follows: <u>Provide for discharges to air whilst ensuring their effects on H</u> uman health, amenity and mana whenua values and the life-supporting capacity of ecosystems are <u>appropriately managed</u> <del>protected from the adverse effects of discharges to air.</del>	Aurora <b>supports</b> removal of an unjustifiably high bar with respect to discharges to air which requires 'protection' in favour of an approach which seeks to appropriately manage discharges to air.  Aurora seeks the relief be <b>allowed</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
9.	Dunedin City Council	00139.050	AIR – P4	Amend as follows: Avoid <u>or minimise as far as practicable...</u> Add guidance to policy around activities that may be important to provide, e.g. infrastructure. Provide an explanation as to why this approach (if it is continued to be pursued) is considered necessary, along with high level guidance as to suitable alternatives/approaches that would be promoted.	Aurora <b>supports</b> removing instances of an unqualified use of the term “avoid” sought generally by the Dunedin City Council.  Aurora seeks the relief be <b>allowed</b> .
10.	Kāi Tahu ki Otago / Aukaha	00226.121	AIR – P6	Amend as follows: Avoid discharges to air that adversely affect mana whenua values <del>by having particular regard to values and areas of significance to mana whenua.</del> <u>When assessing the impact of discharges to air on mana whenua values, have particular regard to sites and landscapes of significance to Kāi Tahu, including wāhi tūpuna, wāhi tapu, and wāhi taoka.</u>	Aurora <b>conditionally supports</b> the relief sought in so far as it is consistent with and provides for the relief sought by Aurora's submission. Aurora is supportive of guidance which identifies the particular values in which an applicant is to have particular regard to. However, Aurora considers it is necessary to remove the unconditional “avoid” term by including the words “avoid, remedy, or mitigate”.  Aurora seeks the decision <b>partially allow</b> the relief insofar as it is consistent with Aurora's submission on AIR-P6.
11.	Kāi Tahu ki Otago / Aukaha	00226.135	CE – O5	Renumber and amend as follows: CE – O5 <u>O6</u> – Activities in the coastal environment <u>Where required to locate in the coastal environment due to functional or operational need, or to provide for the cultural, social or economic wellbeing of people or their health and safety, A activities in the coastal environment:</u> (1) <u>avoid adverse environmental and cultural effects as a priority, including adverse effects on customary fisheries including mātaihai reserves and taiāpure,</u> (2) make efficient use of space occupied in the coastal marine area, (3) are of a scale, density and design compatible with their location, (4) are only provided for within appropriate locations and limits, and maintain or enhance public access to and along the coastal marine area, including for customary uses <u>including mahika kai and kaimoana gathering.</u>	Aurora opposes relief sought to point (1) where it seeks to insert a new avoid policy. However, Aurora supports the relief to incorporate reference to “functional or operational needs”.  Aurora therefore <b>opposes</b> the relief sought to (1) and seeks that relief be <b>declined</b> and otherwise <b>supports</b> the balance of relief sought and seeks it to be <b>allowed</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
12.	Te Rūnanga o Ngāi Tahu	00234.017	CE – O5	<p>Renumber and amend as follows:</p> <p>“CE – O5 <u>O6</u> – Activities in the coastal environment</p> <p><u>To enable activities to locate in the coastal environment due to functional or operational need, or to provide for the cultural, social or economic wellbeing of people or their health and safety, provided: A activities in the coastal environment:</u></p> <p>(5) <u>any adverse effects on Ngāi Tahu on cultural values, including adverse effects on customary fisheries including mātaihai reserves and taiāpure, are avoided;</u></p> <p>(6) <u>any other adverse environmental effects are avoided, remedied or mitigated;</u></p> <p>(7) <u>efficient use is made of</u> space occupied in the coastal marine area,</p> <p>(8) <u>activities</u> are of a scale, density and design compatible with their location <u>and the need to manage adverse effects; and,</u></p> <p>(9) <u>are only provided for within appropriate locations and limits, and</u></p> <p><u>public access</u> to and along the coastal marine area, <u>including for customary uses including mahika kai and kaimoana gathering is maintained or enhanced, except where public access needs to be restricted for reasons of health and safety or ecological or cultural sensitivity.”</u></p>	<p>Aurora <b>opposes</b> the requirement that “any other adverse environmental effect” is to be avoided, remedied, or mitigated on the basis that it is unclear whether this applies to all adverse effects regardless of scale or whether those effects are more/less than minor. For example, Aurora undertakes operation and maintenance activities on existing infrastructure the continuation of which is put at question with respect to this policy.</p> <p>Aurora however <b>supports</b> the relief in so far as it considers the functional or operational needs of infrastructure.</p> <p>Aurora seeks the relief be <b>partially allowed/declined</b> accordingly.</p>
13.	Dunedin City Council	00139.062	CE – P1	<p>- Retain a policy of this type and consider whether expanding this policy to recognise other relevant links to other sections (e.g. perhaps the ECO and INF sections), and/or adding similar policies to other sections, would aid interpretation.</p> <p>Amend to include reference to the land and freshwater chapter.</p>	<p>Aurora <b>supports</b> adding matters of clarification to CE-P1 which manage activities beyond those currently described. For example, Aurora supports the inclusion of a new point (4) that infrastructure activities are managed in accordance with EIT-INF.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
14.	Wise Response Society Inc	00509.062	CE – P4	<p>Amend as follows:</p> <p>...</p> <p>(5) promoting activities and restoration projects that will restore natural character <u>and ecosystems</u> in the coastal environment where it has been reduced or lost.</p> <p>(6) <u>requiring new activities to achieve net ecological gain and be consistent with prevailing national renewable energy and emission reduction goals</u></p>	<p>Aurora <b>opposes</b> the relief on the basis that its original submission seeks to provide a carve out for existing infrastructure in the coastal environment.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
15.	New Zealand Infrastructure Commission	00321.038	CE – P5	<p>Amend as follows:</p> <p>Infrastructure will need access to the effects management hierarchy in situations containing significant values</p>	<p>Aurora <b>partially supports</b> the relief in so far as it seeks to provide a carve out for infrastructure provided that it is compliant with the “effects management hierarchy (other matters)” as sought in Aurora's original submission.</p> <p>Aurora seeks the relief be <b>partially allowed</b> accordingly.</p>
16.	OWRUG	00235.095	LF – FW – P12	<p>Amend as follows:</p> <p><u>(3) recognising that for infrastructure, EIT – INF – P13 applies instead of LF – FW – P12.</u></p>	<p>Aurora <b>supports</b> the relief on the basis that it is consistent with the relief sought in its submission.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>



FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
17.	Waka Kotahi NZ Transport Agency	00305.023	LF – FW – P12	Amend as follows: Include a third point which could be worded as follows: “(3) <u>where relating to nationally or regionally significant infrastructure, protection through minimising adverse effects on those values.</u> ”	Aurora <b>partially supports</b> a separate effects test for infrastructure consistent with its original submission. However, Aurora does not support inclusion of wording such as “minimising” without sufficient direction as to the extent to which effects are to be minimised.  Aurora therefore supports the intent of the relief, but opposes the inclusion of the term “minimising” that is unqualified by direction as to how that is to be achieved.  Aurora seeks the relief be <b>allowed subject to amendments to qualify the term “minimising”</b> .
18.	Minister for the Environment	00136.009	ECO – General	Amend ECO – Methods to give ORC an explicit role of providing initial spatial data and expertise for identifying Significant Natural Areas.	Aurora <b>supports</b> providing certainty to the future mapped SNAs. Aurora's concern is that if SNAs are not mapped and the provisions limited to mapped areas, then there will be sweeping requirements for ecological assessments in all instances.  Aurora therefore seeks the relief be <b>allowed</b> .
19.	Contact Energy Limited	00318.017	ECO – P2	Delete: OR Amend as follows: “ <del>Identify:</del> <del>(1) the areas and values of significant natural areas in accordance with APP2, and</del> <del>(2) indigenous species and ecosystems that are taoka in accordance with ECO – M3.</del> <u>Significant natural areas will be identified by local authorities using the criteria in APP2 and these areas will be mapped at an appropriate scale in the relevant regional and district plans.</u> <u>Indigenous species and ecosystems that are taoka will be identified by local authorities in accordance with ECO – M3, and these areas will be mapped in the relevant regional and district plans.</u> ”	Aurora <b>supports</b> providing clarity and guidance as to the spatial areas over which Significant Natural Areas will occupy.  Aurora seeks the relief be <b>allowed</b> .
20.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.124	EIT-EN-P5	Amend as follows: “Avoid the development <u>or replacement</u> of non – renewable energy generation activities in Otago and facilitate <u>change from the replacement</u> of non – renewable energy sources, including the use of fossil fuels, in energy generation.”	Aurora <b>opposes</b> the relief sought on the basis that it operates a number of diesel generators which are used for maintaining electricity supply to the community during emergencies or where there are scheduled power shut downs. There are no viable renewable energy alternatives that would enable the continuity of electricity supply to the community that the diesel generators offer.  Aurora seeks the relief be <b>declined</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
21.	Federated Farmers of New Zealand	00239.118	EIT-EN-P5	Amend as follows: <del>"Avoid Discourage</del> the development of non – renewable energy generation activities in Otago and facilitate the replacement of non – renewable energy sources, including the use of fossil fuels, in energy generation. <u>This does not include the use of portable and temporary generators considered under EIT – EN – P8 "</u>	<p>Aurora <b>supports</b> the relief sought on the basis that it operates a number of diesel generators which are used for maintaining electricity supply to the community during emergencies or where there are scheduled power shut downs. There are no viable renewable energy alternatives that would enable the continuity of electricity supply to the community that the diesel generators offer.</p> <p>Although Aurora is continuing to investigate alternative options it will need to continue relying on temporary diesel generators for the time being.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
22.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.126	EIT-EN-M2	Amend as follows: "(2) require the prioritisation of sites for new renewable electricity generation activities where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided <del>or, at the very least, minimised,</del> ... <u>(8) Restrict the development or replacement of non – renewable energy generation activities in Otago and facilitate change from non – renewable energy sources, including the use of fossil fuels, in energy generation."</u>	<p>Aurora <b>opposes</b> the relief sought on the basis that it operates a number of diesel generators which are used for maintaining electricity supply to the community during emergencies or where there are scheduled power shut downs. There are no viable renewable energy alternatives that would enable the continuity of electricity supply to the community that the diesel generators offer.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
23.	Te Ao Marama	00223.108	EIT – INF – General	Ensure there are no gaps or inconsistencies between the way infrastructure is management between this chapter and the Coastal Environment chapter	<p>Aurora opposes the relief as it has sought a carve out from the Coastal Environment chapter (and others) such that effects are managed appropriately with respect to the EIT-INF chapter.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
24.	PowerNet Ltd	00511.032	EIT – INF – General	Recognise the locational constraints in considering the overall impact of the environmental effects of network utilities and in designating sites for substations. AND Planning provisions need to be flexible enough to allow infrastructure development in certain situations, so as not to preclude this infrastructure, which is critical to the health and wellbeing and prosperity of New Zealanders.	<p>Aurora <b>supports</b> encouraging a flexible approach to enabling infrastructure development in certain situations, such that development of infrastructure is not effectively prohibited by unqualified avoid policies throughout PRPS21.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
25.	PowerNet Ltd	00511.033	EIT – INF – General	Ensure that the networks PowerNet Ltd manages are adequately recognised in the PORPS, are protected from the potential adverse effects of other activities, and that the networks' future upgrade, maintenance and renewal are not unnecessarily impeded.	<p>Aurora <b>supports</b> addressing the potential adverse effects of incompatible activities in proximity to infrastructure. Aurora has lodged a submission which seeks to align PRPS21 with where the parties arrived at on PRPS19 following extensive discussions between relevant stakeholders, who are also submitters in this proceeding, but many of which were not afforded a consultation opportunity. Part of that package of provisions included a suite of protections to Aurora's infrastructure from incompatible activities.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
26.	Queenstown Airport Corporation	00313.023A	EIT-INF – General	Amend as follows: For EIT – INF – M4 – Regional Plans delete the word 'minimised' and replace it with 'remedied or mitigated'. AND For EIT – INF – M5 – District Plans, to delete the word 'minimised' and replace it with 'remedied or mitigated'.	Aurora <b>supports</b> replacing the word "minimised" with "remedied or mitigated" on the basis that the term "minimised" carries a high threshold for reducing adverse effects, which is not always possible given the functional or operational needs of infrastructure.  Aurora seeks the relief be <b>allowed</b> .
27.	Director-General of Conservation	00137.102	EIT – INF – O4	Amend EIT – INF – O4 to ensure that adverse effects are required to be minimised in all cases.	Aurora <b>opposes</b> the relief sought on the basis that the term "minimised" carries a high threshold for reducing adverse effects, which is not always possible given the functional or operational needs of infrastructure.  Aurora seeks the relief be <b>declined</b> .
28.	New Zealand Infrastructure Commission	00321.051	EIT – INF – O4	Delete the reference to development being within 'environmental limits'. OR Provide a definition of 'environmental limits' consistent with that contained in the NBA Exposure Draft, i.e. to confirm that such limits: <ul style="list-style-type: none"> <li>only apply to ecological integrity or human health (not more amorphous or subjective values such as amenity, character, or landscape)</li> <li>must be set by, or in strict accordance with, national direction</li> <li>can be met through offsetting and compensation.</li> </ul>	Aurora supports deleting the term "environmental limits" which is consistent with its original submission. However, should the Commission consider that the term "environmental limits" is appropriate, it is considered that such a term needs a definition consistent with the relief sought in the submission.  Aurora seeks the relief be <b>allowed</b> .
29.	Director-General of Conservation	00137.103	EIT – INF – O5	Amend EIT – INF – O5 to ensure that adverse effects are required to be minimised in all cases.	Aurora <b>opposes</b> the relief sought on the basis that the term "minimised" carries a high threshold for reducing adverse effects, which is not always possible given the functional or operational needs of infrastructure.  Aurora seeks the relief be <b>declined</b> .
30.	OWRUG	00235.114	EIT – INF – O5	Amend to refer to infrastructure generally.	Aurora <b>supports</b> the general reference to "infrastructure" over specific types of infrastructure.  Aurora seeks the relief be <b>allowed</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
31.	Queenstown Airport Corporation	00313.016	EIT – INF – O5	Amend as follows: “Development of nationally and regionally significant infrastructure, as well as land use change, occurs in a co – ordinated manner to: <del>minimize</del> <u>(1) avoid, remedy or mitigate</u> adverse effects on the environment, <u>and</u> <u>(2) ensure the operational and functional needs of the infrastructure is not compromised</u> and increase efficiency in the delivery, operation and use of the infrastructure.”	Aurora <b>supports</b> replacing the word "minimised" with “remedied or mitigated” on the basis that the term “minimised” carries a high threshold for reducing adverse effects, which is not always possible given the functional or operational needs of infrastructure.  Aurora seeks the relief be <b>allowed</b> .
32.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.128	EIT – INF – O5	Amend as follows: “... ordinated manner to <u>avoid or</u> minimise ...”	Aurora <b>opposes</b> the unqualified use of the term “avoid” without direction as to whether activities ought to avoid or minimise adverse effects.  Aurora seeks the relief be <b>declined</b> .
33.	Transpower New Zealand Limited	00314.034	EIT – INF – O5	Amend as follows: “Development of nationally and regionally significant infrastructure <u>is coordinated with, as well as</u> land use change <u>so that the operation and use of the infrastructure is efficient and , occurs in a co-ordinated manner to minimise</u> adverse effects on the environment <u>are managed</u> and <del>increase efficiency in the delivery, operation and use of the infrastructure.</del> ”	Aurora <b>supports</b> the appropriate management and operation of infrastructure in the environment. Aurora considers that it is not appropriate for this objective to require the increased efficiency of the delivery of infrastructure while also placing a high bar on the extent to which adverse effects are to be managed in relation to that infrastructure. The dual outcome sought between infrastructure delivery and reducing the adverse effects as set out in the notified PRPS21 is untenable.  Aurora seeks the relief be <b>allowed</b> .
34.	Federated Farmers of New Zealand	00239.126	EIT – INF – O6	Amend as follows: “Long-term investment in, and planning for, <del>electricity transmission</del> infrastructure, and its integration with land use, is sustained.”	Aurora <b>supports</b> the relief sought on the basis that it applies to infrastructure generally.  Aurora seeks the relief be <b>allowed</b> .
35.	Horticulture New Zealand	00236.078	EIT – INF – O6	<ul style="list-style-type: none"> <li>- It is not clear what the objective is seeking to address (at least 13 definitions relating to infrastructure– but electricity transmission is not one of them).</li> <li>- As electricity sub – transmission infrastructure is defined it would be appropriate that the policy applies to that infrastructure.</li> <li>- Amend as follows: “EIT – INF – O6 Long term planning for electricity <u>sub–</u> transmission infrastructure”</li> </ul>	Aurora <b>supports</b> the intent of the relief which seeks to rationalise the extensive definitions related to infrastructure, particularly electricity infrastructure, and the use of the term electricity transmission infrastructure in the subjective. Aurora has lodged a submission seeking that the term electricity transmission infrastructure be placed with “the National Grid and Distribution Network” as those terms have been defined in PRPS21 and in Aurora's original submission.  Aurora opposes the particular drafting on the basis that it conflicts with Aurora's original submission.  Aurora seeks the general thrust of the relief be <b>allowed</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
36.	New Zealand Infrastructure Commission	00321.053	EIT – INF – O6	Amend as follows: Development and upgrading of electricity transmission infrastructure should be provided for over the longer term, not just planned for and invested in.	Aurora <b>supports</b> enabling the long term provision of electricity infrastructure. However, the relief conflicts with Aurora's submission on the INF-O6 which seeks that is applied to “the National Grid and Distribution Network” as those term have been defined in PRPS21 and Aurora's original submission.  Aurora supports the intent of the relief, it opposes the particular drafting that has been offered, and therefore seeks that the relief be <b>declined</b> accordingly.
37.	OWRUG	00235.115	EIT – INF – O6	Amend to refer to infrastructure generally.	Aurora <b>supports</b> widening the scope of infrastructure referred to in this objective, and throughout EIT-INF.  Aurora seeks the relief be <b>allowed</b> .
38.	Transpower New Zealand Limited	00314.035	EIT – INF – O6	Amend as follows Replace with: “EIT – INF – O6 – <del>Long – term planning for electricity transmission infrastructure</del> <u>The National Grid The operation, maintenance, upgrade and development of the National Grid is facilitated so that the national significance of the National Grid is recognised and the needs of people and communities are met now and in the future, while adverse effects of, and on, the National Grid are managed. Long – term investment in, and planning for, electricity transmission infrastructure, and its integration with land use, is sustained.</u> ”	Aurora <b>opposes</b> focusing this provision solely to the National Grid to the expense of electricity sub-transmission infrastructure and significant electricity distribution infrastructure. In Aurora's view, the objective should recognise and provide for the transmission and sub-transmission infrastructure given that both are required to deliver electricity supply in Otago.  Aurora seeks the relief be <b>declined</b> .
39.	Dunedin International Airport Limited	00316.004	EIT – INF – P10	Amend as follows: “Decision making on the allocation or use of natural and physical resources must <del>take into account</del> <u>recognise and provide for</u> the needs of nationally and regionally significant infrastructure.”	Aurora <b>supports</b> elevating the extent to which decision making considers regionally significant infrastructure ( <b>RSI</b> ), including Aurora's electricity sub-transmission infrastructure.  Aurora seeks the relief be <b>allowed</b> .
40.	OWRUG	00235.116	EIT – INF – P10	Amend to refer to infrastructure generally.	Aurora <b>supports</b> widening the scope of infrastructure referred to in this objective, and throughout EIT-INF.  Aurora seeks the relief be <b>allowed</b> .

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41.	Queenstown Lakes District Council	00138.116	EIT – INF – P10	<ul style="list-style-type: none"> <li>- Amend so it states the 'needs' that must be taken into account. Consider replacing the word 'needs' with a more specific alternative, such as 'functional needs' and/or 'operational needs'.</li> <li>- The policy could be combined with policy EIT – INF – P15.</li> </ul>	<p>Aurora <b>supports</b> clarifying what is meant by the term “needs”. The current drafting is unclear and unfocused despite the existence of the terms “functional and/or operational needs” in PRPS21.</p> <p>Aurora also <b>supports</b> combining P-10 with P-15 on the basis that both policies seek to manage natural and physical resources and the activities that can occur within them in relation to NSI and RSI.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
42.	Chorus, New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand	00310.006	EIT – INF – P11	<p>Amend as follows:</p> <p>“Except as provided for by ECO – P4, allow for the operation and maintenance of existing <del>nationally and regionally significant</del> infrastructure while</p> <p>....”</p>	<p>Aurora <b>supports</b> widening the scope of infrastructure referred to in this objective, and throughout EIT-INF.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
43.	Dunedin City Council	00139.163	EIT – INF – P11	<p>Amend to be more enabling, e.g. by amending to “minimising adverse effects <u>as far as practicable</u>”.</p>	<p>Aurora <b>supports</b> qualifying the use of the term “minimising”. In Aurora's view, it is important to consider the extent to which limits on the operation and maintenance of RSI is practicable given the importance of maintaining that infrastructure to support the wellbeing of people and community.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
44.	New Zealand Infrastructure Commission	00321.055	EIT – INF – P11	<p>Delete the policy or revise to be more enabling of operation and maintenance of all infrastructure.</p>	<p>Aurora <b>supports</b> the relief generally on the basis that it seeks to enable the operation and maintenance of all infrastructure beyond just NSI and RSI.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
45.	OWRUG	00235.117	EIT – INF – P11	<p>Amend to refer to infrastructure generally.</p>	<p>Aurora <b>supports</b> the relief which seeks to expand the scope of infrastructure referred to.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
46.	Port Otago Ltd.	00301.035	EIT – INF – P11	<p>Clarify how the effects test within this policy should be read in conjunction with other effects policies within other chapters of the RPS through including cross referencing in other chapters to indicate that this policy has precedence for the consideration of infrastructure.</p>	<p>Aurora <b>supports</b> clarifying the extent to which this policy should be read in conjunction with other policies in the infrastructure chapter.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
47.	PowerNet Ltd	00511.024	EIT – INF – P11	Delete Policy, or amend as follows: “... <del>Except as provided for by ECO – P4, a</del> Allow for the operation and maintenance of existing nationally and regionally significant infrastructure. <del>while:</del> <del>(1) avoiding, as the first priority, significant adverse effects on the environment, and</del> <del>(2) if avoidance is not practicable, and for other adverse effects, minimising adverse effects.”</del>	Aurora <b>supports</b> simplifying INF-P11 and removing the effects test contained at (1) and (2). The operation and maintenance of RSI relates to existing infrastructure and is often provided for (or allowed) as a permitted activity in district plans within Otago. Given the importance of those activities to supporting the wellbeing of people and communities in Otago it is considered that a policy should unequivocally allow such activities.  Aurora seeks the relief be <b>allowed</b> .
48.	Queenstown Airport Corporation	00313.018	EIT – INF – P11	Amend as follows: <del>“Except as provided for by ECO – P4, allow for</del> Enable the operation and maintenance of existing nationally and regionally significant infrastructure while: (1) avoiding, as the first priority, significant adverse effects on the environment, and (2) if avoidance is not practicable, and for other adverse effects, <del>minimising</del> <u>remedying or mitigating</u> adverse effects.	Aurora <b>supports</b> the removal of any cross reference to ECO – P4 and reframing the policy to be more enabling of the operation and maintenance of infrastructure.  Aurora also supports the relief at (2) which seeks to reduce the effects test from “minimising” to “remedying or mitigating” as that is more enabling to operation and maintenance of infrastructure.  Aurora seeks the relief be <b>allowed</b> .
49.	Queenstown Lakes District Council	00138.117	EIT – INF – P11	<ul style="list-style-type: none"> <li>- Amend by replacing the words ‘allow for’ with ‘provide for’.</li> <li>- Redraft (1) and (2) so they are linked with an ‘or’, as they provide alternatives.</li> </ul>	Aurora supports reframing this policy to provide for the operation and maintenance of infrastructure. However, Aurora considers that amendments to this policy should go further than what has been set out in this submission, such as what has been sought in 00511.024.  Aurora seeks the relief be <b>partially allowed</b> .
50.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.129	EIT – INF – P11	Amend as follows: “Except as provided for by ECO – P4, allow for the operation and maintenance of existing nationally and regionally significant infrastructure while: (1) avoiding, as the first priority, <del>significant</del> adverse effects on the environment, and (2) if avoidance is not <del>demonstrably</del> practicable, <del>and for other adverse effects,</del> <del>minimising</del> <u>remedy any remaining adverse effects on the environment, if remaining adverse effects cannot be demonstrably completely remedied then mitigate remaining adverse effects.</u> ”	Aurora <b>opposes</b> the relief sought which places an unjustifiably high threshold to reducing adverse effects with respects to the operation and maintenance of RSI. The relief fails to consider that the operation and maintenance relates to existing activities within the environment. Furthermore, if Aurora is unable to adequately operate and maintain its network, then its ability to maintain a resilient electricity supply to the community may be compromised.  Aurora seeks the relief be <b>declined</b> .
51.	Waka Kotahi NZ Transport Agency	00305.040	EIT – INF – P11	Amend as follows: Include clearer distinction between the operation, maintenance, upgrade and new infrastructure, and replace ‘avoid’ with ‘minimise’ or similar.	Aurora <b>supports</b> distinguishing between activities related to <i>existing</i> and <i>new</i> infrastructure, as well as the removal of the term “avoid” which appears to be unnecessary in this policy.  Aurora seeks the relief be <b>allowed</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
52.	Dunedin City Council	00139.164	EIT – INF – P12	Amend as follows: <ul style="list-style-type: none"> <li>- Replace 'development of' with 'new'.</li> <li>- Consider separate policies for new (greenfields) infrastructure vs upgrades of existing infrastructure.</li> </ul> Add additional clause (4) to reflect role of infrastructure in community well-being.	Aurora <b>supports</b> the use of language that assists with the distinction between activities related to existing and new infrastructure. Aurora also supports recognition of the role of infrastructure and support in community wellbeing.  Aurora seeks the relief be <b>allowed</b> .
53.	Federated Farmers of New Zealand	00239.127	EIT – INF – P12	Amend as follows or similar: (3) <u>as far as practicable, legitimate existing land uses are not adversely impacts; and</u> (4) increases efficiency in the delivery, operation or use of the infrastructure.	Aurora <b>opposes</b> the high threshold for “not adversely” impacting existing “legitimate” activities. Although the qualifier of “as far as practicable” is used, the relief still sets a wide scope for the types of activities that may operate or be located on the property including any new buildings associated with a farming activity.  Aurora seeks the relief be <b>declined</b> .
54.	OWRUG	00235.118	EIT – INF – P12	Amend to refer to infrastructure generally.	Aurora <b>supports</b> widening the scope of infrastructure referred to beyond NSI and RSI.  Aurora seeks the relief be <b>allowed</b> .
55.	Port of Otago Ltd.	00301.039	EIT – INF – P12	Amend to include cross referencing in other chapters to indicate that this policy has precedence for the consideration of infrastructure. Fix drafting for sub – clause (3).	Aurora <b>supports</b> the use of cross referencing to provide clarity as to the extent to which policies take precedence or should be applied in conjunction with other policies in the infrastructure chapter.  Aurora seeks the relief be <b>allowed</b> .
56.	Queenstown Lakes District Council	00138.118	EIT – INF – P12	Amend so the policy applies to upgrades and development of other infrastructure. Consider combining with EIT – INF – P14.	Aurora <b>supports</b> broadening the scope of this policy so that it applies to other infrastructure beyond NSI and RSI. Additionally, Aurora supports combining this policy with P-14 which also applies to the development and upgrade of infrastructure.  Aurora seeks the relief be <b>allowed</b> .
57.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.130	EIT – INF – P12	Add the following clause to EIT – INF – P12: <u>“adverse effects on indigenous biodiversity are avoided and managed as set out in the BIO and CE chapters and natural character in the CE chapter”</u> Make amendments to additional policies as needed so that provisions which would provide for or enable infrastructure activities, must be in the context of also protecting, maintaining and restoring indigenous biodiversity	Aurora <b>opposes</b> the relief sought on the basis that its submission generally seeks a carve out for infrastructure activities from the ECO and CE chapters subject to compliance with an effects management hierarchy (other matters).  Aurora seeks the relief be <b>declined</b> .



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58.	Central Otago District Council (CODC)	00201.03	EIT – INF – P13	Support avoidance of new infrastructure in areas with high ecological, cultural, heritage landscape and amenity values.	Aurora <b>opposes</b> the total avoidance of new infrastructure in the areas described without sufficient justification from higher order instruments or RMA Part 2 that such an approach is appropriate, or outweighs the need to provide for the health and wellbeing of people and communities.  Aurora seeks the relief be <b>declined</b> .
59.	Beef & Lamb NZ and Deer Industry NZ	00237.053	EIT – INF – P13	Amend policy to avoid locating infrastructure in areas of productive land use where the activity affects the ability of the land to be used productively and consider the adverse effects on the land's productive capacity and flexibility.	Aurora <b>opposes</b> the relief sought on the basis that it owns and operates a significant amount of infrastructure in rural areas, including on private property, which may contain productive soils. The relief sought would effectively prohibit Aurora from locating any new infrastructure within these areas despite its infrastructure often occupying narrow corridors within rural areas.  Aurora seeks that the relief be <b>declined</b> .
60.	Chorus, New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand	00310.007	EIT – INF – P13	Amend as follows: The effects management regime in Clause 2(a) of the policy applies to all infrastructure.	Aurora <b>supports</b> the relief on the basis that parts of its network are not presently defined as RSI. However, Aurora has sought conflicting relief which seeks to apply an alternative effects management regime as set out in its submissions.  Given the above, Aurora seeks that the relief be <b>partially allowed</b> .
61.	Director-General of Conservation	00137.107	EIT – INF – P13	Amend as required for consistency with relief sought for EIT – INF – O4 and O5. Amend EIT – INF – P13, or insert a new policy, to address new infrastructure within the coastal environment, in accordance with the relevant provisions of the NZCPS.	Aurora <b>opposes</b> the relief sought on the basis that the submission on O4 and O5 seeks to minimise adverse effects in all case.  Aurora seeks the relief be <b>declined</b> .
62.	Federated Farmers of New Zealand	00239.128	EIT – INF – P13	Amend by adding a new 'i' to the list in EIT – INF – P13(1): <u>"(i) areas of highly productive soils"</u>	Aurora <b>opposes</b> the relief sought on the basis that its existing network is likely to be located in large swathes of highly productive land, but only occupying narrow corridors within that land. Furthermore, a large proportion of Aurora's network is located in the Rural Zone (most likely to contain HPS) and so Aurora may be unable to avoid locating in those areas (for functional and/or operational reasons).  Aurora seeks the relief be <b>declined</b> .
63.	Kāi Tahu ki Otago / Aukaha	00226.241	EIT – INF – P13	Amend to clarify how new infrastructure in the coastal environment will be managed. Amend clause 1 as follows: (g) <u>wāhi tūpuna</u> , wāhi tapu, wāhi taoka, and areas with protected customary rights, and ... Amend clause 2 by adding new subclause iv and v as follows: (iv) <u>in wāhi tūpuna, in accordance with HCV – WT – P2,</u> <u>in outstanding natural features and landscapes, in accordance with NFL – P2,</u>	Aurora <b>opposes</b> the relief sought on the basis that it has sought that (2) be replaced with an alternative effects management hierarchy. However, Aurora would consider amending its relief in that respect to include wāhi tūpuna, so that activities within those areas can be managed. As demonstrated in the recent QLDC PDP Stage 3 hearings, the extent of wāhi tūpuna areas in Otago is significant and certainly not practicable for Aurora to avoid those areas. Aurora invites discussion with Aukaha on this point.

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					Aurora seeks the relief be <b>declined</b> .
64.	New Zealand Infrastructure Commission	00321.057	EIT – INF – P13	Amend as follows: Revise the policy to adopt a threshold of “reasonably practicable” rather than the current threshold of “possible”, at Clause (2).	Aurora <b>supports</b> the relief as there may be many engineering solutions “possible” to achieve a certain outcome but whether or not that is “reasonably practicable” is another question. Often the solutions that are possible may cost well out of proportion to the ability to provide electricity supply or simply prohibitive for customers to pay for, where they require new overhead infrastructure to provide an additional electricity connection.  Aurora seeks the relief be <b>allowed</b> .
65.	OWRUG	00235.120	EIT – INF – P13	Amend EIT – INF – P13(2) as follows [amendments unmarked]: “(2) If it is not possible to avoid locating in the areas list in (1) above because of the functional or operational needs of the infrastructure manage effects as follows: (a) in significant natural areas in accordance with ECO – P6, (b) In natural wetlands in accordance with the relevant provisions of the NESF In other areas listed in EIT – INF – p13(1) above in accordance with the effects management hierarchy (other matters).	Aurora <b>supports</b> the relief sought on the basis that it is consistent with its original submission.  Aurora seeks the relief be <b>allowed</b> .
66.	Port of Otago Ltd.	00301.040	EIT – INF – P13	Amend to include cross referencing in other chapters to indicate that this policy has precedence for the consideration of infrastructure. Remove references to areas or values that are not defined or identified through the RPS.	Aurora <b>supports</b> adding cross-referencing to assist in the legibility of the PRPS21.  Aurora seeks the relief be <b>allowed</b> .
67.	Queenstown Airport Corporation	00313.020	EIT – INF – P13	Amend as follows: Delete and replace with drafting comparable with Policy such as 4.3.4 in the 2019 RPS and clarify that this policy solely applies to nationally or regionally significant infrastructure proposals located in the areas identified in clause (1). OR Amend the policy as follows: “When providing for new infrastructure outside the coastal environment: (1) avoid, as the first priority, locating infrastructure in all of the following: (a) significant natural areas, (b) outstanding natural features and landscapes (c) natural wetlands, (d) outstanding water bodies (e) areas of high or outstanding natural character (f) areas or places of significant or outstanding historic heritage, and (g) wāhi tapu, wāhi taoka, and areas with protected customary rights, and <del>(h) areas of high recreational and high amenity value, and</del> (2) if it is not <del>possible</del> <b>practicable</b> to avoid locating in the areas listed in (1) above because of the functional or operational needs of the infrastructure manage adverse effects as follows: (a) for nationally or regionally significant infrastructure: (i) in significant natural areas, in accordance with ECO – P4,	Aurora <b>supports</b> a reversion back to the position reached with PRPS19, which only recently became operative and was the subject of extensive negotiations between the parties to that process. It is regrettable that parties are having to re-engage with this process having come so far. However, it is expected that such a reversionistic approach is unlikely to be acceptable to the commission which is why Aurora has lodged a submission seek a suite of amendments to provisions to get them to a position close to where the parties got to last time.  Aurora seeks the relief be <b>partially allowed</b> .

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				<p>(ii) in natural wetlands, in accordance with the relevant provisions in the NESF,</p> <p>(iii) in outstanding water bodies, in accordance with LF – P12,</p> <p>(iv) in other areas listed in EIT – INF – P13(1) above, <del>minimise remedy or mitigate</del> the adverse effects of the infrastructure on the values that contribute to the area's importance."</p> <p>AND</p> <p>Clarify that this policy solely applies to nationally or regionally significant infrastructure proposals located in the areas identified in clause (1).</p>	
68.	Queenstown Lakes District Council	00138.119	EIT – INF – P13	<p>Amend to provide guidance as to how 'high' recreational and amenity values referred to in (h) are to be measured or determined.</p> <p>Amend (2)(b) to use a different method to manage adverse effects on values, rather than avoidance as currently drafted.</p>	<p>Aurora <b>supports</b> the request for clarification as to the mapping of the areas referred to therein. Aurora network spans a significant part of Otago, including areas of s 6(b) and s 7(c) landscapes which are typically mapped in district plans. It is unclear whether additional mapping will be required for recreational areas so clarification is necessary.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
69.	Te Ao Marama	00223.109	EIT – INF – P13	<p>Amend as follows:</p> <p>"...(1)(g) <u>wāhi tūpuna</u>, wāhi tapu and wāhi taoka, and areas with protected customary rights ..." Establish an effects management hierarchy in EIT – INF – P13 sub – clause (2)</p>	<p>Aurora <b>opposes</b> the relief, but is open to discussing the point with Te Ao Marama on the basis that wāhi tūpuna areas are likely to span significant parts of the region. As such, it is often very difficult for Aurora to avoid those areas as a result of the functional or operational needs of its network.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
70.	Waka Kotahi NZ Transport Agency	00305.042	EIT – INF – P13	<p>Amend as follows:</p> <p>Include clearer distinction between the operation, maintenance, upgrade and new infrastructure, and replace 'avoid' with 'minimise' or similar.</p>	<p>Aurora <b>supports</b> providing clarity to the use of language to distinguish between the new and existing infrastructure and considers that the policies in EIT-INF can be rationalised in that respect. Aurora also considers that the PRPS21 contains far too many instances of unqualified "avoid" or "minimise" language without any guidance as to how effects are to be managed to address those thresholds.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
71.	Wayfare Group Ltd	00411.062	EIT – INF – P13	<p>Amend as follows:</p> <p>When providing for new <i>infrastructure</i> outside the coastal environment:</p> <p>...</p> <p>(2) if it is not possible to avoid locating in the areas listed in (1) above because of the functional or operational needs of the infrastructure manage adverse effects as follows:</p> <p><del>(a) for nationally or regionally significant infrastructure:</del></p> <p><del>(b) (a) in significant natural areas, in accordance with ECO – P4,</del></p> <p><del>(c) (b) in natural wetlands, in accordance with the relevant provisions in the NESF,</del></p> <p><del>(d) (c) in outstanding water bodies, in accordance with LF-P12.,</del></p> <p><del>(e) in other areas listed in EIT – INF – P13 (1) above, minimise the adverse effects of the infrastructure on the values that contribute to the area's importance, and</del></p> <p><del>(f) for all infrastructure that is not nationally or regionally significant, avoid adverse effects on the values that contribute to the area's outstanding nature or significance.</del></p>	<p>Aurora <b>supports</b> expanding the scope of infrastructure beyond those currently provided for in P13.</p> <p>Aurora seeks the relief be <b>granted</b>.</p>

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72.	Dunedin City Council	00139.165	General	Amend or add a new policy to clarify whether EIT – INF – P13 is intended to prevail over policies in other sections of the RPS, e.g. NFL – P2 and NFL – P3, in the event of a conflict.	<p>Aurora <b>supports</b> the general relief sought and has similarly sought a suite of amendments to policies in PRPS21 such that this policy takes precedence. Aurora supports any additional or consequential relief that gives effect to this submission, subject to an appropriate effects management hierarchy, such as that advanced by Aurora to be included in this policy.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
73.	New Zealand Infrastructure Commission	00321.058	EIT – INF – P14	<p>Amend as follows:</p> <p>“When considering proposals to develop or upgrade infrastructure:</p> <p>(1) require consideration of alternative sites, methods and/or designs if adverse effects are potentially significant or irreversible, and</p> <p>(2) utilise the opportunity of substantial upgrades of infrastructure to reduce adverse effects that result from the existing infrastructure, including on sensitive activities <u>where appropriate</u>.”</p>	<p>Aurora <b>supports</b> qualifying (2) to recognise that it may not always be appropriate to consider opportunities to reduce effects on existing infrastructure. For example, it is not reasonably practicable or possible to reduce adverse effects from Aurora's Zone Substations.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
74.	Queenstown Lakes District Council	00138.120	EIT – INF – P14	Amend to state whether or not it applies to nationally and regionally significant infrastructure. Amend the title of the policy so that it refers to upgrades and development of infrastructure. Consider combining with EIT – INF – P12.	<p>Aurora <b>supports</b> clarification of this policy to apply as to the scope of infrastructure that it applies to as some infrastructure may necessarily be of such a small scale so as to not warrant consideration against this policy.</p> <p>Aurora seeks the relief be <b>granted</b>.</p>
75.	Waka Kotahi NZ Transport Agency	00305.043	EIT – INF – P14	<p>Amend as follows:</p> <p>Clarify the interpretation and application of the terms 'develop', 'upgrade' and 'substantial upgrade', and also amend the policy to encourage, rather than require, a reduction in adverse effects arising from existing infrastructure at the time that works are undertaken to upgrade that infrastructure.</p>	<p>Aurora <b>supports</b> clarification of “upgrade” from “substantial upgrade” on the basis that the former, includes the latter and there appears to be no analysis in the s 32 report for a distinction with the latter.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
76.	Dunedin City Council	00139.167	EIT – INF – P15	Amend wording to: Manage activities that may result in reverse sensitivity effects on nationally or regionally significant infrastructure, and/or where they may compromise the functional or operational needs of nationally or regionally significant infrastructure in a way that avoids or minimises as far as practicable the risk of reverse sensitive effects.	<p>Aurora <b>supports</b> the relief which includes a more coherent drafting approach to this policy which reframes the policy from “seek to avoid” to manage, by avoiding activities.</p> <p>Aurora seeks that the relief be <b>allowed</b> subject to additional wording to include significant electricity distribution infrastructure.</p>
77.	Federated Farmers of New Zealand	00239.129	EIT – INF – P15	<p>Amend as follows or similar:</p> <p>“<del>Protecting</del> <u>Recognising and providing for</u> nationally or regionally significant infrastructure <u>To the extent reasonably practicable</u>, seek to avoid the establishment of <u>sensitive</u> activities ...”</p>	<p>Aurora <b>opposes</b> the relief sought which weakens protections with respect to RSI by introducing effectively three effects tests that water down the provision. Furthermore, it is inappropriate to introduce the term “sensitive” activities, on the basis that it is relevant activity to be protected by this provision is the infrastructure, not the activity.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
78.	Horticulture New Zealand	00236.079	EIT – INF – P15	Amend as follows: <del>"Protecting"</del> <u>Recognising and providing for</u> nationally or regionally significant infrastructure Seek to avoid, <u>to the extent reasonably possible</u> , the establishment of <u>sensitive</u> activities that result in reverse sensitivity effects on nationally or regionally significant infrastructure and/ or compromise the functional or operational needs of nationally or regionally significant infrastructure."	Aurora <b>opposes</b> the relief sought which weakens protections with respect to RSI by introducing effectively three effects tests that water down the provision. Furthermore, it is inappropriate to introduce the term "sensitive" activities, on the basis that it is relevant activity to be protected by this provision is the infrastructure, not the activity.  Aurora seeks the relief be <b>declined</b> .
79.	New Zealand Infrastructure Commission	00321.059	EIT – INF – P15	Amend as follows: Consistent with the need to give effect to the NPSET, EIT – INF – P15 should be amended so that: <ul style="list-style-type: none"> <li>the requirement or direction is strengthened: "seek to avoid" is not as strong as (in effect) 'avoid to the extent reasonably possible'</li> </ul> the focus is on avoiding both reverse sensitivity and direct effects on the operation, maintenance, upgrading, and development of the electricity transmission network.	Aurora <b>supports</b> the relief which seeks to increase the level of protection to RSI.  Aurora seeks the relief be <b>granted</b> .
80.	Queenstown Airport Corporation	00313.022	EIT – INF – P15	Amend as follows: <del>"Seek to avoid the establishment of activities that may result in reverse sensitivity effects on nationally or regionally significant infrastructure, and/or where they may compromise the functional or operational needs of nationally or regionally significant infrastructure.</del> <u>Protect the efficient and effective operation of nationally and regionally significant infrastructure by:</u> <u>(1) Avoiding activities that may give rise to an adverse effect on the functional or operational needs of nationally or regionally significant infrastructure,</u> <u>(2) Avoiding activities that may result in reverse sensitivity effects on nationally or regionally significant infrastructure,</u> <u>(3) Avoiding activities and development that forecloses an opportunity to adapt, upgrade or develop nationally or regionally significant infrastructure to meet future demand.</u>	Aurora <b>supports</b> the relief sought subject to an amendment that includes significant electricity distribution infrastructure.  Aurora seeks the relief be <b>partially allowed</b> , subject to the amendment sought in this further submission.
81.	Queenstown Lakes District Council	00138.121	EIT – INF – P15	Amend by replacing the word 'Protecting' with an alternative word, or rename the policy so it refers to reverse sensitivity (as per EIT – EN – P7).	Aurora <b>supports</b> renaming the policy to alert plan users to the fact that it addresses reverses sensitivity effects on NSI and RSI.  Aurora seeks the relief be <b>allowed</b> .
82.	Transpower New Zealand Limited	00314.036	EIT – INF – P15	Amend as follows: <del>"Seek to a</del> <u>Avoid the establishment of, or expansion of existing,</u> activities that may result in <del>reverse sensitivity</del> <u>adverse</u> effects <u>including reverse sensitivity effects</u> , on nationally or regionally significant infrastructure, <del>and/or where they may compromise the functional or operational needs of nationally or regionally significant infrastructure."</del>	Aurora <b>supports</b> the relief on the basis that it includes recognition of the expansion of existing activities that may gradually encroach towards electricity conductors and restrict the ability to operate, maintain, develop or upgrade that infrastructure. Aurora also supports broadening the scope of the policy to refer to adverse reverse sensitivity effects generally.  Aurora seeks the relief be <b>granted</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
83.	Federated Farmers of New Zealand	00239.130	EIT – INF – P16	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>- Define or clarify the term 'electricity transmission infrastructure'</li> <li>- Amend EIT – INF – P16(5) as follows or similar:</li> </ul> <p>“(5) minimising the adverse effects of the electricity transmission network on <u>existing land uses and</u> urban amenity, <del>and avoiding adverse effects</del> on town centres, areas of high amenity or recreational value, <u>highly productive soils</u>, and existing sensitive activities. “</p>	<p>Aurora <b>supports</b> the relief seeking clarity on the term 'electricity transmission infrastructure and seeks the relief be <b>allowed</b> accordingly.</p> <p>Aurora <b>opposes</b> the amendment to P16(5) on the basis that Aurora owns and operate a considerable amount of its network in rural zones which may include HPS but certainly include farming activities which may not be possible to minimise adverse effects.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
84.	Horticulture New Zealand	00236.080	EIT – INF – P16	<ul style="list-style-type: none"> <li>- Clarify what 'electricity transmission infrastructure' EIT – INF – P16 applies to.</li> <li>- Amend EIT – INF – P16 (5) by adding “<u>and highly productive land</u>”</li> </ul>	<p>Aurora <b>supports</b> the relief seeking clarity on the term 'electricity transmission infrastructure and seeks the relief be <b>allowed</b> accordingly.</p> <p>Aurora <b>opposes</b> the amendment to P16(5) on the basis that Aurora owns and operate a considerable amount of its network in rural zones which may include HPS which may not be possible to minimise adverse effects.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
85.	Kāi Tahu ki Otago / Aukaha	00226.243	EIT – INF – P16	<p>Amend clause 5 as follows:</p> <p>(5) minimising the adverse effects of the electricity transmission network on urban amenity, and avoiding adverse effects on town centres, <u>areas of significance to mana whenua such as wāhi tūpuna</u>, areas of high amenity or recreational value and existing sensitive activities.</p>	<p>Aurora <b>opposes</b> the relief, but is open to discussing the point with Te Ao Marama on the basis that wāhi tūpuna areas are likely to span significant parts of the region. As such, it is often very difficult for Aurora to avoid those areas as a result of the functional or operational needs of its network.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
86.	OWRUG	00235.123	EIT – INF – M4	<p>Amend the provisions to take into account the functional and operational needs of infrastructure.</p>	<p>Aurora <b>supports</b> the relief, particularly with respect to its ability to minimise adverse effects, which may not be possible or reasonably practicable when considering the functional or operational needs of that infrastructure.</p> <p>Aurora Seeks the relief be <b>allowed</b>.</p>
87.	Dunedin City Council	00139.171	EIT – INF – M5	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>- Delete clause (1)</li> <li>- Delete clause (2) or clarify what this means in a practical sense.</li> <li>- Amend (3) to sound less like a rule, change to activities 'need to be managed'.</li> <li>- Delete (6)(c) or amend to recognise that infrastructure upgrades may be funded in a variety of ways, to not rely on the definition of infrastructure, to remove the word 'avoid' as this is too strong.</li> </ul> <p>Delete (7) or amend so it is clear what is being prioritised and how prioritisation is to be achieved.</p>	<p>Aurora <b>supports</b> the relief for the reasons advanced by the submitter but subject to Aurora's submission on this provision.</p> <p>Aurora seeks the relief be <b>partially allowed</b>.</p>

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
88.	Network Waitaki Limited	00320.026	EIT – INF – M5	<p>Delete, or Amend as follows:</p> <p><u>Territorial authorities must prepare or amend and maintain their district plans to:</u></p> <p><u>(1) require a strategic approach to the integration of land use and nationally or regionally significant infrastructure.</u></p> <p><u>(2) provide for the operation and maintenance of the National Grid and Electricity Distribution Network to achieve a resilient electricity supply.</u></p> <p><u>(3) enable planning for the development and upgrade of the National Grid and Electricity Distribution Network.</u></p> <p><u>(4) map the National Grid, Electricity Sub – transmission infrastructure and Significant Electricity Distribution Infrastructure and identify a buffer corridor within which sensitive activities shall generally not be allowed</u></p> <p>...</p> <p><u>(7) Ensure that development is avoided where:</u></p> <p>...</p> <p><u>d. require the prioritisation of sites in accordance with the effects management hierarchy (other matters).</u></p>	<p>Aurora <b>supports</b> the relief on the basis that it is consistent with its submission on this policy.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
89.	OWRUG	00235.124	EIT – INF – M5	<p>Amend the provisions to take into account the functional and operational needs of infrastructure.</p>	<p>Aurora <b>supports</b> the relief, particularly with respect to its ability to minimise adverse effects, which may not be possible or reasonably practicable when considering the functional or operational needs of that infrastructure.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
90.	PowerNet Ltd	00511.026	EIT – INF – M5	<p>Delete, or amend as follows:</p> <p>"Territorial authorities must prepare or amend and maintain their district plans to:</p> <p>1) require a strategic approach to the integration of land use and nationally or regionally significant infrastructure,</p> <p>2) <u>provide for the operation and maintenance of the National Grid and Electricity Distribution Network to achieve a resilient electricity supply.</u></p> <p>3) <u>enable planning for the development and upgrade of the National Grid and Electricity Distribution Network.</u></p> <p>4) map the <u>National Grid, Electricity Sub – transmission infrastructure and Significant Electricity Distribution Infrastructure</u> and identify a buffer corridor within which sensitive activities shall generally not be allowed, and</p> <p>...</p> <p>5) ensure that development is avoided where:</p> <p>a. it cannot be adequately served with infrastructure,</p> <p>b. it utilises infrastructure capacity for other planned development, or</p> <p>c. the required upgrading of infrastructure is not funded, and</p> <p>d. <u>require the prioritisation of sites in accordance with the effects management hierarchy (other matters).</u>"</p>	<p>Aurora <b>supports</b> the relief on the basis that it is consistent with its submission on this policy.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
91.	Waka Kotahi NZ Transport Agency	00305.054	EIT – INF – M6	Amend as follows: Include recognition of the existing use rights of infrastructure and that infrastructure cannot always be easily upgraded or replaced. OR Delete this provision.	Aurora <b>supports</b> the relief on the basis that it recognises existing use rights of which a considerable amount of Aurora's infrastructure enjoys pursuant to the Electricity Act 1992.  Aurora seeks the relief be <b>allowed</b> .
92.	OWRUG	00235.119	EIT – INF – E2	Amend to refer to infrastructure generally.	Aurora <b>supports</b> expanding the scope of infrastructure beyond NSI and RSI, particularly given that RSI does not include the entirety of Aurora's network.  Aurora seeks the relief be <b>allowed</b> .
93.	Waka Kotahi NZ Transport Agency	00305.059	EIT – INF – PR2	Amend as follows: Further consideration is given to the appropriateness and implications for infrastructure providers of the use of 'avoid' in this Principal Reason, with preference that the term 'avoid' is replaced with 'minimise' or similar.	Aurora <b>supports</b> the submission and other generally which seek to remove, qualify or justify the use of the term "avoid" in PRPS21. Such a term is significantly constraining to infrastructure activities, and particularly NSI and RSI given their importance to the region. Aurora also has reservations about the unqualified use of the term "minimise" without an appropriate effects management hierarchy, which Aurora has advanced in its submission.  Aurora seeks the relief be <b>allowed</b> .
94.	Federated Farmers of New Zealand	00239.131	EIT – INF – AER7	Delete and replace as follows: <u>"Reverse sensitivity effects caused by sensitive activities on nationally and regionally significant infrastructure will be avoided to the extent reasonably possible."</u>	Aurora <b>partially supports</b> the relief insofar as it recognises the adverse reverse sensitivity effects on NSI and RSI and that they will be avoided to the extent reasonably possible. However, Aurora has reservations about the use of the term "sensitive" which theoretically includes any activity that causes an adverse reverse sensitivity effect on NSI or RSI.  Aurora seeks the relief be <b>partially allowed</b> .
95.	Horticulture New Zealand	00236.082	EIT – INF – AER7	Delete and replace as follows: <u>"Reverse sensitivity effects on nationally and regionally significant infrastructure from sensitive activities will be avoided to the extent reasonably possible."</u>	Aurora <b>partially supports</b> the relief insofar as it recognises the adverse reverse sensitivity effects on NSI and RSI and that they will be avoided to the extent reasonably possible. However, Aurora has reservations about the use of the term "sensitive" which theoretically includes any activity that causes an adverse reverse sensitivity effect on NSI or RSI.  Aurora seeks the relief be <b>partially allowed</b> .
96.	OWRUG	00235.128	EIT – INF – AER8	Amend EIT – INF – AER8 as follows: "the adverse effects associated with infrastructure are avoided and minimised to the extent practicable in accordance with the effects management hierarchy".	Aurora <b>supports</b> the relief which recognises that enabling infrastructure activities anticipates a level of effects that have been reduced the extent reasonably practicable.  Aurora seeks the relief be <b>allowed</b> .



FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
97.	Te Ao Marama	00223.118	HAZ- Hazards and Risks - General	Retain the aspects of this chapter that support climate change response.	Aurora <b>supports</b> provisions of PRPS21 which support a positive climate change response and to advance electrification of the economy. Such an approach is promoted and enabled by an efficient, resilient electricity network, including through consideration of electricity transmission, sub-transmission and distribution infrastructure collectively.  Aurora seeks the relief be <b>allowed</b> .
98.	Z Energy Limited, BP Oil NZ Limited, Mobil Oil NZ Limited	00510.059	HAZ- Hazards and Risks - General	Amend as follows: <u>Policy X – Avoid duplication of hazardous substance controls provided by other legislation.</u>	Aurora <b>supports</b> rationalising and simplifying PRPS21 to the extent practicable and possible, including by considering opportunities to remove controls where they are otherwise located in other documents. However, Aurora accepts that to a certain degree it can be useful to include those controls in PRPS21 for convenience but considers that they ought not to be more restrictive than those other measures.  Aurora seeks the relief be <b>allowed</b> .
99.	Sanford Limited	00122.030	HAZ – NH – General	Amend Policy HAS NH P2, HAZ NH P3 and HAZ NH P4, Method HAZ–NH–M3 – Regional plans, Method HAZ–NH–M4 – District plans, and APP6 - Methodology for natural hazard risk assessment, to the extent required so that they does not direct individual developments be avoided where significant natural hazard risk can be suitably mitigated at that site for a particular development	Aurora <b>supports</b> additional guidance on natural hazard risk assessment on enabling development of its network where it can be demonstrated that natural hazard risk can be suitably mitigated.  Aurora seeks the relief be <b>allowed</b> .
100.	Oceana Gold (New Zealand) Limited	00115.026	HAZ – NH – O1	Retain this objective. However, OceanaGold wishes to confirm that “tolerable” is consistent with the acceptable hazard risk which appears to be more commonly used in practice.	Aurora <b>supports</b> either further clarification on the use of the term “tolerable” which is used in the objective or replacement with the industry term “acceptable”.  Aurora seeks the relief be <b>allowed</b> .
101.	Central Otago District Council (CODC)	00201.037	HAZ – NH – O1	Provide clarity regarding what a ‘tolerable level’ is and record hazard identification at a land use activity level.	Aurora <b>supports</b> either further clarification on the use of the term “tolerable” which is used in the objective or replacement with the industry term “acceptable”.  Aurora seeks the relief be <b>allowed</b> .
102.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.136	HAZ – NH – O2	Amend as follows: “Otago's people, property, <u>ecosystem health, indigenous biodiversity,</u> and ...”	Aurora <b>opposes</b> the relief sought on the basis that the inclusion of ecosystem health and indigenous biodiversity goes beyond what is expected to be managed through this chapter. Adverse effects on and risks to those matters are more appropriately addressed at ECO.  Aurora seeks the relief be <b>declined</b> .
103.	Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.137	HAZ – NH – P1	Amend as follows: “... communities, <u>ecosystem health, indigenous biodiversity,</u> and property by assessing: ...”	Aurora <b>opposes</b> the relief sought on the basis that the inclusion of ecosystem health and indigenous biodiversity goes beyond what is expected to be managed through this chapter. Adverse effects on and risks to those matters are more appropriately addressed at ECO.  Aurora seeks the relief be <b>declined</b> .

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104.	Central Otago District Council (CODC)	00201.039	HAZ – NH – P2	Clarify who will undertake the assessment – should be at a regional level.	Aurora <b>supports</b> clarifying the party who will be undertaking the risk assessment so that this is not attribute to individual applicants on an ad hoc basis.  Aurora seeks the relief be <b>allowed</b> .
105.	Trojan Holdings Limited (Trojan)	00206.054	HAZ – NH – P2	Amend as follows: Assess the level of <i>natural hazard risk</i> by determining a range of <i>natural hazard</i> event scenarios and their potential consequences in accordance with: <u>(1) A risk table at a district or community scale undertaken in a consultation process with communities, stakeholders and partners regarding risk levels thresholds; or if this process has not been undertaken</u> <u>(2) the criteria set out within APP6.</u>	Aurora <b>supports</b> the addition of (1) on the basis that it clarifies the scale at which assessments are to be carried out in accordance with APP6 and directs that consultation be undertaken with key stakeholders. In Aurora's view, such consultation should be undertaken with infrastructure providers.  Aurora seeks the relief be <b>allowed</b> .
106.	Wayfare Group Limited	00411.068	HAZ – NH – P2	Amend as follows: Assess the level of <i>natural hazard risk</i> by determining a range of <i>natural hazard</i> event scenarios and their potential consequences in accordance with: <u>(1) A risk table or matrix at a district or community scale undertaken in a consultation process with communities, stakeholders and partners regarding risk levels thresholds; or if this process has not been undertaken</u>  <u>(2) the criteria set out within APP6.</u>	Aurora <b>supports</b> the addition of (1) on the basis that it clarifies the scale at which assessments are to be carried out in accordance with APP6 and directs that consultation be undertaken with key stakeholders. In Aurora's view, such consultation should be undertaken with infrastructure providers.  Aurora seeks the relief be <b>allowed</b> .
107.	Graymont (NZ) Limited	00022.021	HAZ – NH – P3	Amend as follows: <u>(1) when the natural hazard risk is significant, the activity is avoided except where the activity may be functionally required to be undertaken in an area where the natural hazard risk is significant, then the activity must be managed so that it does not further increase the natural hazard risk,</u> ...	Aurora <b>supports</b> recognising the functional or operational needs of infrastructure in HAZ-NH, including P3, on the basis that seeking to avoid the location of new activities in areas of higher risk of natural hazards may prohibit the ability for infrastructure providers to support the social, economic, health and wellbeing of people and communities.  Aurora seeks the relief be <b>allowed</b> .
108.	New Zealand Infrastructure Commission	00321.076	HAZ – NH – P3	Amend as notified: Revise or expand on clause (3) on how in particular coastal hazard risks would be maintained over time, given they are expected to worsen over time due to climate change	Aurora <b>supports</b> guidance on the extent to which activities are to be maintained in the coastal environment considering the effects of climate change. Aurora has infrastructure located in the coastal environment and will require direction about the location of future infrastructure in those areas.  Aurora seeks the relief be <b>allowed</b> .
109.	Transpower New Zealand Limited	00314.044	HAZ – NH – P3	Amend policy as follows: "Once the level of natural hazard risk associated with an activity has been determined in accordance with HAZ – NH – P2, manage new activities to achieve the following outcomes: <u>1. when the natural hazard risk is significant, the activity is avoided unless the activity is nationally significant infrastructure that has a functional need or operational need for its location and the risk is appropriately managed, .....</u> "	Aurora <b>partially</b> supports the relief insofar as it supports recognition of the functional or operational needs of infrastructure but seeks that the types of infrastructure be expanded to include electricity sub transmission infrastructure and significant electricity distribution infrastructure.  Aurora seeks the relief be <b>partially allowed</b> .
110.	Queenstown Lakes District Council	00138.149	HAZ – NH – P4	- Amend to clarify it and make it more directive and specific to address the concerns raised <ul style="list-style-type: none"> <li>Should specify what level risk is to be reduced to. To be consistent with Objective 1, the policy must set out that risk is to be reduced to a level that is not greater than tolerable.</li> </ul>	Aurora <b>supports</b> the relief for the reasons given in that submission.  Aurora seeks the relief be <b>allowed</b> .

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				<ul style="list-style-type: none"> <li>1) and (2) appear to suggest that risk be reduced or community vulnerability be reduced; not clear why these present an either or option when both are important and should be sought.</li> <li>(3) Should also reference property alongside people and communities.</li> <li>Policy to acknowledge that risk can only be reduced when existing characteristics of people, property and communities are changed. Additional amendments should be considered to provide helpful direction as to how risk can be reduced.</li> <li>Should consider timelines for reducing risk and different methods for reduction i.e. in some instances reduction may be necessary now, or it may be necessary over a longer timeframe.</li> <li>Should provide additional context as to what constitutes vulnerable activities. This may include more traditional vulnerable activities (i.e. aged care facilities) as well as other types of activities that accommodate vulnerable populations such as tourists or transient populations.</li> <li>It is recommended that the policy outline when existing risk needs to be reduced i.e. when risk exceeds tolerable/is significant.</li> <li>The policy could consider non – RMA methods to reduce risk.</li> </ul> <p>- Amend as follows:  "Reduce existing natural hazard risk <u>to a tolerable or lower level</u> by..."</p> <p>- Delete (4)(a) and relocate to be associated with HAZ – NH – P3(3).</p> <p>- (5) and (6) Recommend moving to HAZ – NH – P8</p>	
111.	Dunedin City Council	00139.198	HAZ – NH – P5	Clarify what the 'precautionary approach' is, and how it will be applied.	<p>Aurora <b>supports</b> clarifying the scope of the precautionary approach in the context of this chapter, including whether this requires activities to avoid, remedy or mitigate adverse effects or creating additional risk. Furthermore, it is unclear how this policy will be balanced against the need to provide for infrastructure activities in areas of known natural hazard risk.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
112.	Dunedin City Council	00139.199	HAZ – NH – P6	Amend to recognise that this policy should operate consistently with infrastructure policies.	<p>Aurora <b>supports</b> enabling a consistent approach between this chapter and EIT-INF, including by enabling a balance between recognising the risk posed by natural hazards and activities located within them, and the need to provide for the social, economic and health and wellbeing of people and communities who may reside within areas of natural hazard risk.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
113.	Trustpower Limited	00311.054	HAZ – NH – P8	<p>Amend as follows:  Add new clause  "(3) <u>recognise that there can be a functional and operational need for lifeline utilities and facilities for essential or emergency services to locate in areas of natural hazard risk in some circumstances.</u>"</p>	<p>Aurora <b>supports</b> consideration of the functional or operational needs of lifeline utilities to locate in areas of natural hazard risk as it may not be possible or practicable to avoid those locations when providing electricity supply to people or communities.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

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114.	Dunedin City Council	00139.202	HAZ – NH – P9	Amend policy name as follows: Protection of hazard mitigation measures, <u>lifeline utilities</u> , and <u>essential or emergency services</u> . See generic comments on the use of the word 'avoid' in policies.	Aurora <b>supports</b> relief the policy with the policy name.  Aurora seeks the relief be <b>allowed</b> .
115.	Queenstown Airport Corporation	00313.026	HAZ – NH – P9	Amend as follows: "Protect the functional <u>and operational</u> need of hazard mitigation measures, lifeline utilities, and essential or emergency services, including by:...."	Aurora <b>supports</b> considering operational needs in addition to the functional needs of infrastructure. There appears to be no s 32 analysis to support removal of the operational needs of lifeline utilities.  Aurora seeks the relief be <b>allowed</b> .
116.	Dunedin City Council	00139.203	HAZ – NH – P10	Amend as follows: - 'Ensure' in this context has the same meaning as 'avoid'. See generic comments on the use of the word 'avoid' in policies. Clarify what is meant by 'redevelopment'.	Aurora <b>supports</b> removing the unqualified use of the term "avoid" or "ensure", in this context such that there is a consenting pathway for activities such as infrastructure which may have functional or operational needs to locate in the coastal environment. Aurora further supports additional guidance on the term "redevelopment" including whether that term includes the development or upgrade of existing electricity infrastructure.  Aurora seeks the relief be <b>allowed</b> .
117.	Horticulture New Zealand	00236.089	HAZ – NH – M3	Amend (7)(a) to add: " <u>commensurate with the level of risk from the proposed activity</u> "	Aurora <b>supports</b> ensuring that the level risk assessment provided for in a resource consent application is consistent with the level of risk posed by the new activity.  Aurora seeks the relief be <b>allowed</b> .
118.	Ravensdown Limited	00121.087	HAZ – NH – M3	Amend as follows: Otago Regional Council must prepare or amend and maintain its regional plans to: ... <del>{6} include provisions that require decision makers to apply the precautionary approach set out in HAZ – NH – P5 when considering applications for resource consent for activities that will change the use of land and thereby increase the risk from natural hazards within areas subject to natural hazard risk that is uncertain or unknown, but potentially significant or irreversible, and</del> <del>(6Z) ...</del>	Aurora <b>supports</b> removing (6) on the basis that it is unclear whether the precautionary approach will apply to infrastructure activities.  Aurora seeks the relief be <b>allowed</b> .
119.	Wayfare Group Limited	00411.072	HAZ – NH – M3	Amend as follows: Otago Regional Council must prepare or amend and maintain its <i>regional plans</i> to: (1) manage activities in the <i>coastal marine area, beds of lakes and rivers</i> , and <i>wetlands</i> to achieve policies HAZ – NH – P2 to HAZ – NH – P6 <del>and APP6</del> , (2) include <i>natural hazard</i> reduction measures, <del>such as removing or restricting existing land uses, where there is significant risk to people or property,</del>	Aurora <b>supports</b> narrowing the policy away from restricting existing land uses on the basis that such uses may relate to RSI, including significant electricity distribution infrastructure and that infrastructure is required to service the community and can otherwise be managed with natural hazard reduction measures.  Aurora seeks the relief be <b>allowed</b> .
120.	Federated Farmers of New Zealand	00239.140	HAZ – NH – M4	Amend as follows: <del>"{6} include provisions that require decision makers to apply the precautionary approach set out in HAZ – NH – P5 when considering applications for resource consent for activities that will change the use of land and which may increase the risk from natural hazards within areas subject to natural hazard risk that is uncertain or unknown, but potentially significant or irreversible, and</del>	Aurora <b>supports</b> ensuring that the level risk assessment provided for in a resource consent application is consistent with the level of risk posed by the new activity.  Aurora seeks the relief be <b>allowed</b> .

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				(7) require a natural hazard risk assessment be undertaken where an activity requires a plan change or resource consent to change the use of land which will increase the risk from natural hazards within areas subject to natural hazards, and where the application is lodged prior to the natural hazard risk assessment <u>commensurate with the level of risk</u> to be required by HAZ – NH – M2(1) being completed, the natural hazard risk assessment must include: ..."	
121.	Ravensdown Limited	00121.088	HAZ – NH – M4	Amend as follows: Territorial authorities must prepare or amend and maintain their district plans to: ... <del>(6) include provisions that require decision makers to apply the precautionary approach set out in HAZ – NH – P5 when considering applications for resource consent for activities that will change the use of land and which may increase the risk from natural hazards within areas subject to natural hazard risk that is uncertain or unknown, but potentially significant or irreversible, and</del> <del>(6Z) ...</del>	Aurora <b>supports</b> removing (6) on the basis that it is unclear whether the precautionary approach will apply to infrastructure activities.  Aurora seeks the relief be <b>allowed</b> .
122.	Federated Farmers of New Zealand Limited	00239.142	HAZ – NH – AER2	Amend as follows or similar: "No <u>Discourage</u> new developments <del>proceed</del> that have a significant level of risk."	Aurora <b>supports</b> reframing AER2 away from prohibitive language such as "no" to an approach that provides direction as to the types of developments that are not encouraged by PRPS21. There may be instances where it is essential that development proceeds despite the risk that is posed. The scope of new "developments" is also unclear and which Aurora seeks clarity on – i.e. does this include RSI?  Aurora seeks the relief be <b>allowed</b> .
123.	Federated Farmers of New Zealand	00239.143	HAZ – NH – AER4	Amend as follows: "Where existing development is subject to <u>significant</u> risks from natural hazards, the level of risk is reduced <u>as far as practicable</u> to a tolerable level."	Aurora <b>supports</b> inclusion of references to "as far as practicable" on the basis that the community need for RSI infrastructure may be such that reducing the risk as far as possible, or to a tolerable level may be prohibitive and require the infrastructure to be removed. It is appropriate that RSI or infrastructure generally be provided for in this way.  Aurora seeks the relief be <b>allowed</b> .
124.	LAC Properties Trustees Limited	00211.033	HAZ – CL – P14	Amend policies so they do not provide a higher bar for protection than is in the NES contaminated land.	Aurora <b>supports</b> maintaining consistency with the level of regulation of contaminated land with the NES Contaminated Soils.  Aurora seeks the relief be <b>allowed</b> .
125.	Federated Farmers of New Zealand	00239.148	HCV – General	Amend the chapter so the focus is on protection from inappropriate subdivision, use and development as per HCV – WT – E1.	Aurora <b>supports</b> reframing this chapter away from a protect by avoid to a framework of protect by avoiding inappropriate subdivision, use and development of land. Aurora has a significant amount of its infrastructure located within mapped Wāhi Tupuna areas in the Otago Region. Although Aurora has engaged with Aukaha (and seeks to continue that relationship and consultation) it remains unclear as to the extent to which the operation, maintenance, upgrade or development of its infrastructure is inappropriate or should be avoided. Given the scope of Wāhi tupuna areas in Otago, total avoidance cannot be achieved.  Aurora seeks the relief be <b>allowed</b> .

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126.	Federated Farmers of New Zealand	00239.149	HCV – WT – O1	Amend as follows: “Wāhi tūpuna <del>sites are protected from inappropriate subdivision, use and development</del> and their associated cultural values are identified and <u>provided for and maintained protected.</u> ”	Aurora <b>supports</b> reframing this chapter away from a protect by avoid to a framework of protect by avoiding inappropriate subdivision, use and development of land. Aurora has a significant amount of its infrastructure located within mapped Wāhi Tupuna areas in the Otago Region. Although Aurora has engaged with Aukaha (and seeks to continue that relationship and consultation) it remains unclear as to the extent to which the operation, maintenance, upgrade or development of its infrastructure is inappropriate or should be avoided. Given the scope of Wāhi tupuna areas in Otago, total avoidance cannot be achieved.  Aurora seeks the relief be <b>allowed</b> .
127.	Kāi Tahu ki Otago / Aukaha	00226.275	HCV – WT – O1	Amend as follows: HCV – WT – O1 – Kāi Tahu <del>cultural landscapes</del> <u>wāhi tūpuna</u> Wāhi tūpuna and their associated cultural values are identified, <u>where appropriate</u> , and protected.	Aurora supports inclusion of the qualifier “where appropriate” in this objective as it provides a level of flexibility for RSI to continue to operate, maintain, upgrade and develop without being subject to onerous protection requirements in all instances.  Aurora seeks the relief be <b>allowed</b> .
128.	Te Rūnanga o Ngāi Tahu	00234.034	HCV – WT – O1	Amend as follows: HCV – WT – O1 – Kāi Tahu <del>cultural landscapes</del> <u>wāhi tūpuna</u> Wāhi tūpuna and their associated cultural values are identified, <u>where appropriate</u> , and protected.	Aurora supports inclusion of the qualifier “where appropriate” in this objective as it provides a level of flexibility for RSI to continue to operate, maintain, upgrade and develop without being subject to onerous protection requirements in all instances.  Aurora seeks the relief be <b>allowed</b> .
129.	Federated Farmers of New Zealand	00239.150	HCV – WT – P2	Amend as follows: “Wāhi tūpuna are <del>protected and managed</del> by: (1) avoiding significant adverse effects <u>of inappropriate subdivision, use and development</u> on the cultural values associated with identified wāhi tūpuna, (2) where adverse effects <del>demonstrably</del> cannot be <del>completely</del> avoided, remedying or mitigating adverse effects in a manner that maintains the values of the wāhi tūpuna, (3) managing identified wāhi tūpuna in accordance with tikaka Māori, (4) <del>avoiding managing</del> any activities that may be considered inappropriate in wāhi tūpuna as identified by Kāi Tahu, and (5) encouraging the enhancement of access to wāhi tūpuna to the extent compatible with the particular wāhi tupuna <u>and with landowner consent.</u> ”	Aurora <b>supports</b> an alternative approach to the notified version of this policy that focuses on managing the adverse effects of infrastructure on Wāhi tupuna mapped areas consistent with its proposed effects management hierarchy (other matters). Such an approach recognises that it is not always possible or practicable for infrastructure to avoid locating in Wāhi tupuna areas, requiring management of their adverse effects. Aurora therefore supports the amendments at (1) and (4) but does not express a view on (5).  Aurora seeks the relief be <b>allowed</b> .
130.	Kāi Tahu ki Otago / Aukaha	00226.278	HCV – WT – P2	Amend as follows: Wāhi tūpuna are protected by: <u>(1) avoiding significant adverse effects on the cultural values of identified wāhi tūpuna,</u> <u>(2) where other adverse effects demonstrably cannot be completely avoided, then either remedying or mitigating adverse effects in a manner that maintains the values of the wāhi tūpuna,</u> <u>(3) enabling Kāi Tahu to manage wāhi tūpuna in accordance with tikaka Māori,</u> <u>(4) avoiding any activities that are inappropriate in wāhi tūpuna as identified by Kāi Tahu, and</u> <u>(5) enhancing access to wāhi tūpuna to the extent compatible with the cultural values of the wāhi tūpuna.</u> <del>1. avoiding significant adverse effects on the cultural values associated with identified wāhi tūpuna,</del>	Aurora <b>supports</b> the relief sought, particularly the reference “inappropriate” activities at (4) which recognises that avoidance is only necessary for those types of activities. However, direction will be required to identify which types of activities are inappropriate with respect to the values of that Wāhi Tupuna Area. Aurora supports the relief subject to inclusion of an additional (6) as sought in 00315.069.  Aurora seeks the relief be <b>allowed</b> .

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				<del>2. where adverse effects demonstrably cannot be completely avoided, remedying or mitigating adverse effects in a manner that maintains the values of the wāhi tūpuna,</del> <del>3. managing identified wāhi tūpuna in accordance with tikaka Māori,</del> <del>4. avoiding any activities that may be considered inappropriate in wāhi tūpuna as identified by Kāi Tahu, and</del> <del>5. encouraging the enhancement of access to wāhi tūpuna to the extent compatible with the particular wāhi tūpuna.</del>	
131.	Transpower New Zealand Limited	00314.045	HCV – WT – P2	<p>Amend (HCV – WT – P2) as follows.  “Wāhi tūpuna are protected by:  1. avoiding significant adverse effects on the cultural values associated with identified wāhi tūpuna,  2. where adverse effects demonstrably cannot be completely avoided, remedying or mitigating adverse effects in a manner that maintains the values of the wāhi tūpuna,  3. managing identified wāhi tūpuna in accordance with tikaka Māori,  4. avoiding any activities that may be considered inappropriate in wāhi tūpuna as identified by Kāi Tahu, and  5. encouraging the enhancement of access to wāhi tūpuna to the extent compatible with the particular wāhi tūpuna, <u>and</u>  <u>6. managing the effects of the development of the National Grid on wāhi tūpuna in accordance with EIT – INF – Px and (1) and (4) above do not apply.</u>”  AND  Cross reference Policy between HCV – WT – P2 (Submission Point 00314.045) and EIT – INF (Submission Point 00314.57)</p>	<p>Aurora <b>conditionally supports</b> the relief insofar as it seeks to provide a carve-out from this policy. However, Aurora does not support the narrow reference to the National Grid in this relief and considers that this ought to be widened to encompass electricity sub transmission infrastructure and significant electricity distribution infrastructure.</p> <p>Aurora seeks the relief be <b>partially allowed</b>.</p>
132.	Toitū Te Whenua, Land Information New Zealand	00101.051	HCV – WT – M1	Local authorities must not only work together to ensure the identification process but must also work with private landowners to ensure the identification of those sites and prevent the destruction or degradation of those sites.	<p>Aurora <b>supports</b> the relief subject to additional consultation requirements with Aurora as the owner and operator of significant swathes of electricity distribution infrastructure within Wāhi Tupuna areas.</p> <p>Area seeks the relief be <b>allowed</b>.</p>
133.	Dunedin City Council	00139.230	HCV – WT – M2	<p>- Clarify that not all responses might apply in all cases.  - Clarify which methods are in accordance with tikaka.  Reduce the requirement for cultural impact assessments to being required on a case-by-case basis.</p>	<p>Aurora <b>supports</b> the requirement for cultural impact assessments to be undertaken on a case by case basis, recognising that Wāhi Tupuna areas can be extensive and Aurora's network spans many of them already, so requiring a CIA in all cases will be a costly and may prove to be unnecessary based on the works involved.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
134.	Federated Farmers of New Zealand	00239.152	HCV – WT – M2	<p>- Provide a definition of 'tikaka' and other key, undefined te reo terms.  - Under M2(2) ensure a 'cultural impact assessment' is provided by council – not something an individual landowner is left to determine.  - Under M2(3) Provide more clarity for landowners so they can engage and appropriately manage areas.  - Amend as follows:  “(1) <u>manage control</u> activities in, or adjacent to, wāhi tūpuna sites and areas,  (3) <u>require including</u> conditions on resource consents or designations <u>where necessary to provide buffers or setbacks between protect</u> wāhi tūpuna <u>and from inappropriate subdivision, use and development incompatible activities,</u>”</p>	<p>Aurora <b>supports</b> the request for clarity on the term “tikaka” as this is the method in which local authorities are required to comply with. Aurora also supports the inclusion of the terms ‘where necessary’ on the basis that conditions may not be required in all instances and may be recommended as part of the CIA process.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

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135.	Kāi Tahu ki Otago / Aukaha	00226.285	HCV – WT – AER2	Amend as follows: HCV – WT – AER2 Wāhi tūpuna and their values are <del>maintained</del> <u>protected</u> .	Aurora <b>supports</b> the relief sought as it appears to be a more appropriate reflection of Kai Tahu's role in identifying and managing Wāhi Tupuna. Aurora also supports clarifying the extent of protection to be from inappropriate subdivision, use and development as opposed to all activities.  Aurora seeks the relief be <b>allowed</b> .
136.	Chorus, New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand	00310.013	HCV – HH – P5	Amend as follows: Add a new clause recognising that infrastructure connections support the ongoing use and protection of historic heritage	Aurora <b>supports</b> recognition of infrastructure in this policy, perhaps through the inclusion of its relief on EIT-INF-P13 (such as a cross-reference) as the ability to use, adapt, upgrade or protect historic heritage often requires new infrastructure connections, or the installation of pillar/link boxes or ancillary equipment.  Aurora seeks the relief be <b>allowed</b> .
137.	Dunedin City Council	00139.234	HCV – HH – P5	- Amend to include some consideration of significant positive effects, similar to 2GP policy 13.2.1.7. While noting there is some carve out for infrastructure this may not go far enough where other projects with significant positive effects may be 'worth' the loss of some historic heritage. - Amend to include a caveat to balance 'avoid', such as "where practicable"; - Clarify Clauses 4 – 5: <ul style="list-style-type: none"> <li>Are they meant to be read as one sentence or otherwise linked and, if so, are there missing punctuation or joining words?</li> <li>Is clause 5 meant to also apply as an alternative to clauses 2 and 3, e.g. that for any type of heritage as long as you can demonstrate you cannot avoid effects then you can just choose to remedy or mitigate them.</li> </ul> - Amend the word 'demonstrably' which is an unusual policy word choice and practicable is preferred as more commonly understood. If not change clarify what type of demonstration is envisaged? Amend by including an example of 'other adverse effects' to assist clarity.	Aurora <b>supports</b> recognition of positive effects associated with development of historic heritage, including elements such as infrastructure which enable the adaptive re-use of historic heritage. Aurora similarly agrees with the inclusion of "where appropriate" to qualify the term "avoid" as it may not always be possible to avoid all adverse effects.  Aurora seeks the relief be <b>allowed</b> .
138.	OWRUG	00235.136	HCV – HH – P5	If the amendments sought to EIT – INF – P13 are accepted, then retain clause (6) of HCV – HH – P5. Alternatively, amend clause (6) of Policy HCV – HH – P5 to manage adverse effects on historic heritage for infrastructure that is not nationally or regionally significant in accordance with clauses (3) to (5) of Policy HCV – HH – P5.	Aurora <b>supports</b> the relief for the reasons given in that submission.  Aurora seeks the relief be <b>allowed</b> .
139.	Dunedin City Council	00139.245	NFL – General	Review all uses of unqualified 'avoid' in policies.	Aurora <b>supports</b> reviewing all references to the unqualified use of the term 'avoid' such that it is only used where required by Part 2 RMA.  Aurora seeks the relief be <b>allowed</b> .
140.	Alluvium Ltd and Stoney Creek Mining Ltd	00016.022	NFL – O1	Amend as follows: The areas and values of Otago's outstanding and <i>highly valued natural features and landscapes</i> are identified, and the use and development of Otago's <i>natural and physical resources</i> results in: 1. the protection of outstanding natural features and landscapes <u>from inappropriate subdivision, use and development</u> , and	Aurora <b>supports</b> the qualification of avoiding adverse effects on ONLF values to align with s 6(b) of the RMA.  Aurora seeks the relief be <b>allowed</b> .



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141.	Ravensdown Limited	00121.093	NFL – O1	Amend as follows: <b>Objective NFL – O1 – Outstanding <del>and highly-valued</del> natural features, and <u>outstanding natural</u> landscapes and visual amenity landscapes</b> The areas and values of Otago's outstanding <del>and highly-valued</del> natural features, <del>and</del> <u>outstanding natural</u> landscapes and visual amenity landscapes are identified, and the use and development of Otago's natural and physical resources results in: (1) the protection of outstanding natural features and landscapes, and (2) the maintenance or enhancement of <del>highly-valued natural features and</del> <u>visual amenity landscapes that contribute to an area's overall visual amenity.</u>	Aurora <b>supports</b> aligning this objective with s 6(b) and s 7(c) of the RMA.  Aurora seeks the relief be <b>allowed</b> .
142.	Wayfare Group Limited	00411.076.	NFL – O1	Amend as follows: The areas and values of Otago's outstanding and <i>highly valued natural features and landscapes</i> are identified, and the use and development of Otago's <i>natural and physical resources</i> results in: (1) the protection of outstanding natural features and <u>outstanding natural</u> landscapes <u>from inappropriate subdivision, use and development</u> , and ...	Aurora <b>supports</b> the qualification of avoiding adverse effects on ONLF values to align with s 6(b) of the RMA.  Aurora seeks the relief be <b>allowed</b> .
143.	Alluvium Ltd and Stoney Creek Mining Ltd	00016.023	NFL – P2	Amend as follows: Protect outstanding natural features and landscapes by: 1. avoiding, <u>as the first priority</u> , adverse <i>effects</i> on the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, and where <u>adverse effects demonstrably cannot be completely avoided due to the functional needs of an activity to locate within outstanding natural features or landscapes, remedying or mitigating them, and</u> ...	Aurora <b>supports</b> the inclusion of a carve out for infrastructure that follows an effects management hierarchy, including as sought by this relief which seeks the avoid as a first priority as opposed to always avoiding.  Aurora seeks the relief be <b>allowed</b> .
144.	Chorus, New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand	00310.014	NFL – P2	Amend as follows: Amend to take into consideration the functional and operational requirements of Infrastructure, extent of benefits, practical alternatives and the extent to which adverse effects are mitigated. OR Add a new policy such that it takes into consideration the functional and operational requirements of Infrastructure, extent of benefits, practical alternatives and the extent to which adverse effects are mitigated.	Aurora <b>supports</b> greater recognition of the functional and operational needs of infrastructure to located in ONLFs and/or Visual Amenity Landscapes. In areas, such as the Queenstown Lakes District this can comprise more than 95% of the District. Recognition that all adverse effects cannot be avoided is a requirement to provide for the health and wellbeing of people and communities.  Aurora seeks the relief be <b>allowed</b> .
145.	Director-General of Conservation	00137.147	NFL – P2	Amend as follows or words to like effect: "...1 avoiding adverse effects on the <del>values that contribute to the</del> natural feature or landscape <del>being considered outstanding, even if those values are not themselves</del> outstanding..."	Aurora <b>opposes</b> the relief sought on the basis that it is inconsistent with the Supreme Court's decision in King Salmon which recognises that protecting an ONLF requires the protection of the values that contribute to the outstanding status of the ONLF. The relief sought directly contradicts that finding.  Aurora seeks the relief be <b>declined</b> .
146.	OWRUG	00235.141	NFL – P2	Amend Policy NFL – P2 as follows: <u>(3) recognising that for infrastructure, EIT – INF – P13 applies instead of NFL – P2.</u>	Aurora <b>supports</b> the relief on the basis that it is consistent with its original submission.  Aurora seeks the relief be <b>allowed</b> .

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147.	Queenstown Airport Corporation	00313.029	NFL – P2	Amend as follows: “Protect outstanding natural features and landscapes by: (1) avoiding <u>significant</u> adverse effects on the values that contribute to the natural feature or landscape being considered outstanding, and (2) avoiding, remedying or mitigating other adverse effects <u>on the values that contribute to the natural feature or landscape being considered outstanding.</u> (3) recognising that for infrastructure, EIT – INF – P13 applies instead of NFL – P2(1) and (2).”	Aurora <b>supports</b> the relief on the basis that it is consistent with its original submission.  Aurora seeks the relief be <b>allowed</b> .
148.	Transpower New Zealand Limited	00314.047	NFL – P2	Amend as follows: “Protect outstanding natural features and landscapes by: 1. avoiding adverse effects on the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, and 2. avoiding, remedying or mitigating other adverse effects, 3. <u>in the case of the development of the National Grid, seeking to avoid adverse effects on the values that contribute to the natural feature or landscape being considered outstanding, and (1) above does not apply.</u> ” OR Insert a new Policy in EIT – INF that sets out specific direction in respect of the management of the potential adverse effects of the maintenance, upgrade and development of the National Grid that, in the event of conflict, prevails over policies in the NFL section of the Proposed ORPS. AND Consider applying a policy similar to Policy CE – P1 in the NFL section of the Proposed ORPS.	Aurora <b>partially supports</b> the relief sought but seeks that it be extended to apply to electricity sub transmission infrastructure and significant electricity distribution infrastructure.  Aurora seeks the relief be <b>partially allowed</b> .
149.	Waka Kotahi NZ Transport Agency	00305.079	NFL – P2	Amend as follows: Rewording is sought so that the functional and operational needs of infrastructure are recognised and provided for. This could include the insertion of a third point as follows: “(3) while recognising the functional and operational needs of nationally and regionally significant infrastructure.”	Aurora <b>supports</b> amending P2 so that the functional and operational needs of infrastructure are recognised and provided for.  Aurora seeks the relief be <b>allowed</b> .
150.	Dunedin City Council	00139.243	NFL – P3	Amend INF policies to clarify relationship with NFL policies.	Aurora <b>supports</b> the relief sought and has sought, through its original submission, to clarify the relationship of the INF policies to apply instead of NFL.  Aurora seeks the relief be <b>allowed</b> .
151.	Transpower New Zealand Limited	00314.048	NFL – P3	Amend as follows: “Maintain or enhance highly valued natural features and landscapes by: 1. avoiding significant adverse effects on the values of the natural feature or landscape, and 2. avoiding, remedying or mitigating other adverse effects, 3. <u>avoiding, remedying or mitigating adverse effects of the development of the National Grid and (1) above does not apply.</u> ” OR Insert a new Policy in EIT – INF that sets out specific direction in respect of the management of the potential adverse effects of the maintenance, upgrade and development of the National Grid that, in the event of conflict, prevails over policies in the NFL section of the Proposed ORPS. AND	Aurora <b>partially supports</b> the relief sought but seeks that it be extended to apply to electricity sub transmission infrastructure and significant electricity distribution infrastructure.  Aurora seeks the relief be <b>partially allowed</b> .

FS#	Submitter Name	Original Submission Point Number	Provision Number	Summary of Decision Requested	Reasons for support or opposition and decision requested
				Consider applying a policy similar to Policy CE – P1 in the NFL section of the Proposed ORPS.	
152.	Dunedin City Council	00139.249	General	<p>Amend as follows:</p> <ol style="list-style-type: none"> <li>1. Remove any duplication/paraphrasing of NPS – UD provisions where this does not add value;</li> <li>2. Avoid reopening of matters that have been recently resolved in the current partially operative RPS 2019 unless necessary to achieve other items in this list;</li> <li>3. Ensure that regional direction aligns and does not conflict with the direction on urban form and development within the recently developed and settled strategic directions that are included in the Dunedin City second generation District Plan (2GP).</li> </ol> <p>Ensure that housing and business land capacity requirements for all medium or high growth areas can be met effectively under the RPS, including by providing for enough feasible development options and by effectively and efficiently facilitating any public or critical infrastructure or services necessary to support growth to operate, develop or expand. Provide clear guidance on how to reconcile any tensions between achieving the above objective with other regional objectives for example around highly productive land, management of natural hazards risk, or landscape protection.</p>	<p>Aurora <b>supports</b> the general relief which seeks a reversion to matters that had been finalised as part of PRS19 except to the extent that new matters are to be inserted to implement the NPSUD.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
153.	Beef & Lamb NZ and Deer Industry NZ	00237.064	Amend	<p>Include an additional anticipated environmental result as follows:</p> <p><u>UFD – AER(12): avoid adverse effects on rural areas caused by reverse sensitivity.</u></p>	<p>Aurora <b>opposes</b> the relief sought on the basis that it seeks a high level of protection from reverse sensitivity effects on rural areas without recognising the functional and operational needs for electricity distribution infrastructure to be located in the rural environment. The relief also disregards the considerable extent of existing infrastructure in rural areas and puts into question the ability to operate, maintain, develop or upgrade that infrastructure.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
154.	Federated Farmers of New Zealand	00239.180	New – provision	<p>Add new as follows:</p> <p><u>UFD – AER12 Highly productive soils are protected from inappropriate development</u></p> <p><u>UFD – AER13 The productive capacity, amenity and character of the rural environment and rural activities are not adversely impacted by inappropriate urban expansion and urban activities and reverse sensitivity issues.</u></p>	<p>Aurora <b>opposes</b> the relief sought on the basis that it seeks a high level of protection from reverse sensitivity effects on rural areas without recognising the functional and operational needs for electricity distribution infrastructure to be located in the rural environment. The relief also disregards the considerable extent of existing infrastructure in rural areas and puts into question the ability to operate, maintain, develop or upgrade that infrastructure.</p> <p>Aurora seeks the relief be <b>declined</b>.</p>
155.	Queenstown Airport Corporation	00313.030	UFD – O2	<p>Amend as follows:</p> <p>Retain subclause (6) as notified.</p> <p>AND</p> <p>Amend subclause (9) as follows:</p> <p>“(9) achieves integration of land use with existing and planned development infrastructure and facilitates the safe and efficient ongoing <u>maintenance</u>, use, <u>development of and upgrades to</u> regionally significant infrastructure.”</p>	<p>Aurora <b>supports</b> amending this objective to consider RSI. As urban environments expand, it is important to consider the extent to which this has an impact on existing sub-transmission infrastructure, zone substations and other RSI which may need to be upgraded or development to further support growing well-functioning urban environments and the health and wellbeing of people and communities.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>

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156.	Transpower New Zealand Limited	00314.050	UFD – O2	<p>Amend as follows:</p> <p>2. allows business and other non – residential activities to meet the needs of communities <u>where those activities are</u> in appropriate locations,</p> <p>....</p> <p>6. minimises conflict between incompatible activities <u>and, in the case of the National Grid, avoids adverse effects on the operation, maintenance, upgrade and development of the National Grid,</u></p> <p>.....</p> <p>9. achieves integration of land use with existing and planned development infrastructure and additional infrastructure and facilitates the safe and efficient ongoing use, <u>maintenance, upgrade and development</u> of regionally significant infrastructure, ....."</p> <p>OR</p> <p>In respect of the amendment to clause (6), alternatively amend clause (6) to add a cross reference to Policy EIT – INF – P15</p>	<p>Aurora <b>partially supports</b> the relief sought but seeks that it be extended to apply to electricity sub transmission infrastructure and significant electricity distribution infrastructure.</p> <p>Aurora seeks the relief be <b>partially allowed</b>.</p>
157.	Meridian Energy Limited	00306.077; 00306.079; 00306.080	UFD – P1	<p>Amend as follows:</p> <p>"Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and development and:</p> <p>...</p> <p>(8) identify, maintain and where <del>possible</del> <u>practicable</u>, enhance important features and values identified by this RPS, <u>and</u></p> <p><u>(9) avoid the potential for reverse sensitivity effects on nationally and regionally significant infrastructure."</u></p>	<p>Aurora <b>supports</b> recognition of the potentially adverse reverse sensitivity effects on existing RSI. This often occurs where planned development is located in rural zones and fails to consider existing sub-transmission lines or zone substations which requires developments be located a certain distance to maintain the operation of the infrastructure and to ensure the health and wellbeing of people and communities. It is important to ensure that existing RSI is considered and planned for in advance of enabling significant development, including through consultation with RSI providers.</p> <p>Aurora seeks the relief be <b>allowed</b>.</p>
158.	Transpower New Zealand Limited	00314.051	UFD – O4	<p>Amend as follows:</p> <p>Development in Otago's rural areas occurs in a way that:</p> <p>1. <del>avoids</del> <u>manages</u> impacts on significant values and features identified in this RPS, <u>and the National Grid, in the manner set out in other sections of this RPS,</u></p> <p>2. <del>avoids as the first priority,</del> gives preference to locations that are not on land and soils identified as highly productive by LF – LS – P19 unless there is an operational need for the development to be located in rural areas, ..."</p>	<p>Aurora partially <b>supports</b> the relief subject to expanding the reference from National Grid to electricity sub transmission infrastructure and significant electricity distribution infrastructure.</p> <p>Aurora seeks the relief be <b>partially allowed</b>.</p>
159.	Queenstown Airport Corporation	00313.031	UFD – P1	<p>Amend as follows:</p> <p>"Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and development and:</p> <p>...</p> <p>(7) facilitate involvement of the current community and respond to the reasonably foreseeable needs of future communities, <del>and</del></p> <p>(8) identify, maintain and where possible, enhance important features and values identified by this RPS, <u>and</u></p> <p><u>(9) ensure impacts on the operation of regionally and nationally significant infrastructure are avoided.</u></p>	<p>Aurora <b>supports</b> recognition of the potentially adverse reverse sensitivity effects on existing RSI and the need to avoid adverse impacts. This often occurs where planned development is located in rural zones, and fails to consider existing sub-transmission lines or zone substations which requires developments be located a certain distance to maintain the operation of the infrastructure and to ensure the health and wellbeing of people and communities. It is important to ensure that existing RSI is considered and planned for in advance of enabling significant development, including through consultation with RSI providers.</p> <p>Aurora considers that the relief could be refined to ensure that the adverse effects of incompatible activities are avoided.</p>

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					Aurora seeks the relief be <b>allowed</b> .
160.	PowerNet Limited	00511.020		Amend as follows: Ensure consistency with best practice or national policy direction when finalising this criteria, such that the significance criteria for indigenous biodiversity are specific and targeted to avoid the inclusion of inappropriate areas within SNAs.	Aurora <b>supports</b> ensuring consistency with impending higher order national direction as to the significance criteria subject to APP2 and seeks that this be specific and targeted as opposed to a sweeping 'blanket' approach.  Aurora seeks the relief be <b>allowed</b> .
161.	Queenstown Airport Corporation	00313.033		Amend as follows: Significance Criteria is amended to ensure indigenous biodiversity are aligned with best practice or national policy direction and are specific and targeted enough to avoid the classification of inappropriate areas as SNAs	Aurora <b>supports</b> ensuring consistency with impending higher order national direction as to the significance criteria subject to APP2 and seeks that this be specific and targeted as opposed to a sweeping 'blanket' approach.  Aurora seeks the relief be <b>allowed</b> .
162.	Meridian Energy Limited	00306.082		Amend as follows: Meridian seeks that (1)(b) of APP3 be amended to remove the term "reasonably measurable" and to instead adopt "measurable". It is not clear how reasonably measurable would differ from measurable. AND Meridian seeks deletion of the term "positive" from criteria 2(e). This recognises that the other criteria require, as a minimum, no-net loss in indigenous biodiversity, and prevents criteria 2(e) being read as if enhancement of indigenous biodiversity outcomes is a compulsory requirement of offsetting. Meridian seeks that Criteria 2(f) is amended for the same reasons, that is, offsetting should be an option to achieve no-net-loss; and/or enhancement of indigenous biodiversity. AND further to the above, and as set out with respect to LF- WAI-P3, Meridian seeks the replacement of "possible" with "practicable". AND Amend APP3 (2)(f) as follows: "APP3 – Criteria for <u>indigenous</u> biodiversity offsetting (1) <u>Indigenous</u> <del>B</del> biodiversity offsetting is not available if the activity will result in: (a) the loss of any individuals of Threatened taxa, other than kānuka ( <i>Kunzea robusta</i> and <i>Kunzea serotina</i> ), under the New Zealand Threat Classification System (Townsend et al, 2008), or (b) <del>reasonably</del> measurable loss within the ecological district to an At Risk – Declining taxon, other than manuka ( <i>Leptospermum scoparium</i> ), under the New Zealand Threat Classification System (Townsend et al, 2008). (2) <u>Indigenous</u> <del>B</del> biodiversity offsetting is available if the following criteria are met: (a) the offset addresses <u>significant</u> residual adverse effects that remain after implementing the sequential steps required by ECO – P6(1) to (3), (b) ... (e) the <del>positive</del> ecological outcomes of the offset endure at least as long as the impact of the activity and preferably in perpetuity, (f) the offset achieves <u>indigenous</u> biodiversity outcomes <del>beyond results that would not have occurred if the without the offset was not proposed,</del>	Aurora <b>supports</b> the additional matters of clarification sought.  Aurora seeks the relief be <b>allowed</b> .

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				(g) the time delay between the loss of <u>indigenous</u> biodiversity and the realisation of the offset is the least necessary to achieve the best <del>possible</del> <u>practicable</u> outcome, (h) ...”	
1.					