

FORM 6

**Further Submission in support of, or in opposition to, submissions on notified
Proposed Waitaki District Plan**

Submission made under clause 8 of Schedule 1, Resource Management Act 1991

**To: Planning Department
 Waitaki District Council
 Private Bag 50058
 Ōamaru 94440**

planreview@waitaki.govt.nz

Further Submitter: Network Waitaki Limited (“NWL”)

NWL made a submission on the Proposed Waitaki District Plan, being submitter number 288.

1. This is a further submission on the following proposed District Plan (*the proposal*):

Proposed Waitaki District Plan (“Proposed Plan”).

2. Only certain people can make a further submission

NWL has an interest in the Proposed Plan that is greater than the interest the general public has on the grounds that it is a network utility operator which owns and operates the electricity distribution network in Waitaki District.

3. Network Waitaki Limited’s further submission

The submissions on the Proposed Plan that NWL either supports or opposes are set out in Table 1 in **Annexure A** attached.

At a general level, the National Policy Statement for Electricity Networks (**NPS-EN**) came into force on 16 January 2026, after the Proposed Plan was notified. This national direction is directly applicable to NWL’s activities as it provides national-level direction recognising the national significance of electricity network infrastructure and aims to ensure that such infrastructure can operate effectively and efficiently as an interconnected system across New Zealand. The Proposed Plan must give effect to the new national policy statement.

NWL is also aware that the National Environmental Standards for Electricity Network Activities (**NES-ENA**) will come into force in the coming months. The NES-ENA will replace the NES for Electricity Transmission Activities (**NES-ETA**). The NES-ENA will include rules to provide for electricity distribution networks and electric vehicle charging infrastructure, as well as electricity transmission activities. Therefore, the NES-ENA will provide rules for managing NWL's electricity distribution infrastructure, which were not included in the NES-ETA. The Proposed Plan must not include provisions that are more stringent than the provisions that are contained in the NES-ENA. While this NES is not yet in force, NWL requests that the Council is cognisant of this national direction when considering the submissions and further submission on the Proposed Plan, as it is expected to come into force during the Proposed Plan review process.

4. Network Waitaki Limited wishes to be heard in support of this submission.

Shane Watson, Network Waitaki Ltd

(A signature is not required if you make your submission by electronic means.)

Dated: 18th May 2026

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Annexure A

Table 1					
#	Submitter	Provision	Position on submission point	Reasons	Decision sought from Council
DEFINITIONS CHAPTER					
233.8	KiwiRail Holdings Limited	New definition	Oppose in part	Network Waitaki Limited (NWL) opposes in part KiwiRail's submission seeking a new definition for 'Rail Corridor Noise Control Overlay'. NWL considers that new buildings that are used for infrastructure (ie that are not used for sensitive activities (as defined)) should be excluded from the definition, as these buildings will not accommodate activities that are sensitive to rail noise. An additional amendment is recommended to align the terminology with the definitions by changing the term 'sensitive land uses' to 'sensitive activities.'	Allow relief with following amendment: <i>Rail Corridor Noise Control Overlay means the area potentially affected by noise between a railway corridor boundary and a distance of 100m. Rail Corridor Noise Control Overlay shown on the planning maps identifies areas that have the potential to experience high noise levels from rail traffic. New buildings <u>to be used for sensitive activities</u> and alterations to habitable rooms in buildings used for sensitive land uses <u>activities</u> are required to demonstrate that adverse noise effects have been appropriately managed by demonstrating compliance with the standards specified in section '2.1 Railway Noise' of Appendix A attached.</i>
242.1	Ministry of Education Te Tāhuhu o Te Mātauranga	New definition	Oppose	The submission seeks a new definition for "Additional Infrastructure" to include a broad range of infrastructure including	Reject the relief sought.

				social infrastructure, such as schools, healthcare facilities, as well as telecommunications networks and networks for transmitting and distributing gas and electricity. This definition overlaps with the definition of 'infrastructure' which includes networks for gas, the transmission and distribution of electricity and telecommunications, which are defined as 'Infrastructure'. Adding an additional definition that also includes these network-utilities will have implications for the effective administration of the Proposed Plan and may impact how the Infrastructure Chapter rules work. It is unclear what changes to the provisions are sought by the submitter to implement this new definition. The term 'social infrastructure' is sought to be included is some of the changes sought by the submitter. The term 'social infrastructure' may be more suitable for inclusion in the Proposed Waitaki District Plan (Proposed Plan).	
309.26	Transpower New Zealand Limited	Definition: Reverse Sensitivity	Support	This submission point supports the definition of "reverse sensitivity" but seeks that reference to resource consents yet to be implemented as part of the existing environment should be included in the definition.	Allow relief sought: <i>means the potential for the operation of an existing, <u>permitted</u>, lawfully established <u>or approved</u> activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or</i>

					<i>perceived adverse environmental effects generated by an existing, <u>permitted</u>, <u>lawfully established or approved</u> activity.</i>
STRATEGIC DIRECTION CHAPTER – SE					
309.40	Transpower New Zealand Limited	General	Support	NWL supports Transpower's submission which seeks a new objective to protect nationally and regionally significant infrastructure from reverse sensitivity effects. This objective will assist to give effect to the National Policy Statement for Electricity Networks (NPS-EN).	Allow relief sought by including the following objective: <i>SE-IEE-O3: Effects on Nationally and Regionally Significant Infrastructure</i> <i>Infrastructure of national and regional significance is protected from incompatible development and activities that may compromise its safe and efficient operation, maintenance and upgrade, including potential reverse sensitivity effects.</i>
INFRASTRUCTURE CHAPTER – INF					
256.28	Fish and Game (Otago and Central South Island Fish and Game Councils)	General	Oppose	The submitter seeks that the NPS-FM effects management hierarchy for rivers and natural inland wetlands should be reflected in the plan. It is unclear what changes are being sought by the submitter and how they may impact the Infrastructure Chapter's rules framework.	Reject relief sought.
259.20	Otago Regional Council	General	Oppose in part	The ORC considers that the infrastructure provisions are inconsistent with the requirements of the Proposed Otago Regional Policy Statement (pORPS) for avoiding sensitive areas. The submitter seeks that the relevant policies and rules	Reject relief sought.

				are be amended for consistency with the EIT chapter of the pORPS. NWL opposes this submission point in part, as the EIT Chapter of the pORPS was finalised prior to the NPS-EN coming into force. The Proposed Waitaki District Plan should give effect to this NPS.	
259.21	Otago Regional Council	General	Oppose	The submitter considers that the infrastructure rules fail to reflect priority avoidance requirements in the pORPS. The submitter seeks to amend any relevant policies and rules in the INF chapter to ensure consistency with the EIT chapter of the pORPS. NWL opposes this submission point in part, as the EIT Chapter of the pORPS was finalised prior to the NPS-EN coming into force, and the National Environmental Standards for Electricity Network Activities (NES-ENA) which will come into force soon. The Proposed Waitaki District Plan should give effect to this NPS and the NES-ENA.	Reject relief sought.
309.50	Transpower New Zealand Ltd	Infrastructure Introduction	Support	NWL agrees that the introduction section should be amended to recognise and provide for regionally and nationally significant infrastructure. This aligns with the NPS-EN which recognises the national significance of the electricity distribution network, and seeks to protect and provide for this infrastructure.	Allow relief sought.

309.52	Transpower New Zealand Ltd	Infrastructure User Notes	Support	The submitter requests clearer user notes to specify which chapters apply to National Grid activities, aiming to reduce duplication and confusion across chapters. NWL agrees with this submission, and seeks that the NES-ENA is also referenced, as this NES is likely to be in force prior to the Proposed Plan becoming operative.	Allow relief sought.
TEMPORARY ACITIVITES CHAPTER – TEMP					
244.108	Telecommunication Companies	Temporary Activities – General	Support	NWL agrees that an amendment to the Introduction of the Temporary Activities Chapter is required to clarify that the Temporary Activities Chapter does not apply to infrastructure activities, which are provided for by Infrastructure Chapter Rule INF-R16.	Allow relief sought.
SUBDIVISION CHAPTER – SUB					
166.37	Horticulture New Zealand	SUB-O2 Subdivision design	Support	NWL agrees that Objective SUB-O2 should include an additional clause to address potential reverse sensitivity effects.	Allow relief sought.
253.137	Royal Forest and Bird Protection Society of New Zealand Incorporated	SUB-O2 Subdivision design	Oppose	The submitter seeks an amendment to this Objective to require every subdivision to result in an increase of indigenous vegetation cover and the restoration or enhancement of indigenous biodiversity. NWL undertakes small scale subdivisions to create lots for utility purposes. These typically occur on land used for rural productive purposes (paddocks), or in urban areas, and typically do not result in a loss of indigenous vegetation. NWL does	Reject relief.

				not agree that every subdivision should result in an increase of indigenous vegetation cover and the restoration or enhancement of indigenous biodiversity.	
309.102	Transpower New Zealand Limited	SUB-O4 Subdivision and Regionally Significant Infrastructure	Support	NWL agrees that the objective, which seeks that subdivision does not compromise regionally significant infrastructure should be retained, as it aligns with the NPS-EN.	Allow relief sought.
166.39	Horticulture New Zealand	SUB-P12 Subdivision Design	Oppose	NWL is concerned that the relief sought by this submission point, which seeks the following additional clause: <i>"Protect highly productive land from loss, fragmentation or incompatible use:</i> may prevent subdivision for activities deemed appropriate in regulation 3.9 of the National Policy Statement for Highly Productive Land (NPS-HPL).	Reject relief.
244.88	Telecommunication Companies	SUB-P3 Provision of infrastructure	Support	NWL agrees there is a need to ensure the provision of infrastructure is considered at the time of subdivision, however, not all infrastructure is governed by WDC standards. The amendment sought by this submitter will enable consideration of other relevant standards, such as those that relate to the electricity distribution businesses, which NWL supports.	Allow relief sought: <i>2. ensuring that infrastructure meets <u>any relevant</u> WDC standards <u>or any infrastructure company standards if the infrastructure in question is not provided by WDC</u>, and has sufficient capacity to accommodate the development or anticipated future development; and</i>

					NWL considers the following wording would also be appropriate (NWL's amendments shown in <u>red underline</u>): 2. ensuring that infrastructure meets <u>any relevant</u> WDC standards <u>where the infrastructure will be owned or operated by WDC</u>, and has sufficient capacity to accommodate the development or anticipated future development; and
244.94	Telecommunication Companies	SUB-S9 Electricity and telecommunica tions	Oppose in part	NWL opposes this submission point in part. NWL agrees that telecommunications and electricity services may not be required for lots created for access, roads, utilities and reserves. NWL seeks that if the submitters relief is accepted, then a requirement to also consult with the relevant electricity distribution company will also be required.	Reject relief unless provisions for engagement with the relevant electricity distribution company are included in the standard, as follows (NWL's amendments shown in <u>red underline</u>): <u>All allotments, other than allotments for access, roads, utilities or reserves, must be provided with connections at the boundary of the net area of the allotment to an electricity supply and telecommunication service unless evidence is provided that a suitable alternative supply can be provided, and a consent notice is proposed alerting future purchasers. In all zones except General Rural, the connection to a telecommunication service must be through an open access fibre network. In the general rural zone the applicant shall provide written confirmation from a</u>

					<u>telecommunication network operator and the electricity distribution operator confirming that a telecommunications connection (fibre, mobile or wireless including satellite) and electricity connection or supply can be provided to all new allotments and describing how this can be achieved. In all zones, at the time of subdivision, sufficient land for telecommunications and electricity supply, and any associated ancillary services must be set aside. For a subdivision that creates more than 15 lots, consultation with telecommunications network utility operators and electricity distribution operators will be required. All necessary easements for the protection of telecommunications and electricity network utility services must be duly granted and reserved. This standard does not apply to allotments for a utility, road, reserve or for access purposes.</u>
EARTHWORKS CHAPTER - EW					
244.96	Telecommunication Companies	EW-S5 Infrastructure earthworks – slope, height and depth	Support	This submission seeks that the standard is amended to exclude earthworks in the road reserve and rail corridor. NWL agrees with this amendment.	Allow relief sought.
RELATIONSHIP BETWEEN SPATIAL LAYERS					

309.4	Transpower New Zealand Limited	Overlay Name	Support	Transpower supports guidance on spatial overlays but requests clarification that National Grid provisions are found in the Infrastructure Chapter and suggests removing references to National Grid overlays in the overlay section. It considers that the PDP is unclear in terms of how the Infrastructure Chapter relates to other chapters in the Proposed Plan, especially regarding the National Grid and suggests that all National Grid matters should be covered in the Infrastructure Chapter. NWL agrees that the National Grid Yard, Subdivision Corridor and Substation Buffer are not mapped overlays and need not be listed in this Chapter of the Proposed Plan. This approach aligns with the approach taken for the Electricity Distribution Corridor Electricity Distribution Yard, which are not terms listed in this table.	Allow relief sought.
NOISE CHAPTER					
242.35	Ministry of Education Te Tāhuhu o Te Mātauranga	NOISE-01 Noise generation	Support	NWL agrees with the amendment sought to Noise Chapter Objective NOISE-01. The amendment would allow the consideration of an activity's operational needs to generate noise when considering effects of noise on the purpose, character and amenity values of an environment.	Allow relief sought
Maps					

101.3	Michael Lowe	Planning Maps - General	Neutral/Support	The submitter requests that the zoning for 156 Airedale Road, Legal Description: Lot: 1 DP: 475532, be changed from GRUZ to LIZ as it considers that there is a high need for Light Industrial Zoning in the Weston area. NWL owns land adjacent to 156 Airedale Road and does not oppose this submission.	Neutral
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