



Edison Consulting Group Limited

Level 2 | 127 Alexandra Street

PO Box 875 | Hamilton | 3240

Tel: +64 21 1944121

08 August 2023

Taupo District Council  
Private Bag 2005,  
Taupō  
3352

Transmittal via e-mail [districtplan@taupo.govt.nz](mailto:districtplan@taupo.govt.nz)

Attention: Hilary Samuel

**Re: Submitter ID OS106: The Lines Company Limited: Tabled Evidence**

---

*Hearing Stream for Plan Change 42 (PC42).*

We act for The Lines Company (TLC) who lodged a submission in regard to PC42 - **General Rural and Rural Lifestyle Environments**.

The Lines Company is an original submitter on PC 42 (Submitter No. 106).

TLC wishes to register their general support for the s42A recommendations in regard to their submissions on PC42 and will not be filing any evidence: rather, this correspondence is requested to be tabled for the information of the Independent Hearings Panel for the proposed plan change.

*Plan Change 42 – General Rural and Rural Lifestyle Environments*

The Section 42A report for PC42 has appropriately captured the intent of TLC in regard to adequate provisions being included within the General Rural and Rural Lifestyle Environments chapters of the Taupo District Plan review - which were to be more accommodating of TLC's sub-transmission network across the Taupo District.

In particular, TLC agrees with the Planning Officer's recommendations which provide recognition of the sub-transmission network having a locational need to be located within rural and rural-lifestyle environments.

TLC sought in their submission (os106.15) recognition in PC42 that it is appropriate to include reference to *sub transmission activities* so as to - in part - avoid confusion with the electricity transmission function of Transpowers National Grid network and the provisions afforded exclusively to Transpower under NPSET and NESETA.

TLC is pleased to see that the s42A author agreed with the submission point and thereby recognises that *TLC's sub transmission* network represents common elements within the Rural and Rural-Lifestyle Environment, and therefore should be recognised as such in the applicable zone provisions.

This recognition is provided for under the amendment to **Objective 3b.2.4 Other activities** so as to include the words "*including sub transmission*".

TLC also submitted on the Rural Zone rules of PC42 relating to '*High voltage transmission lines*' (os106.19), and in particular that as sub transmission lines are also high voltage, the initial PC42 wording could be taken to mean that the provisions of Rule 4b.1.7 could be interpreted to only include Transpower's transmission lines, thereby inadvertently excluding TLC's critical high voltage network.

TLC are pleased and supportive of the planning officers Section 42A recommendation being accepted by the Hearings Panel. By recognising that Rule 4b.1.7 (and subsequent matters of discretion) relate to both transmission and sub transmission lines TLC consider that it will ensure the provision is appropriately interpreted by plan users and administrators.

This recognition is provided for under the recommended amendments to **Rule 4b.1.7** and **Rule 4b.3.7 High voltage transmission lines** - as well as the matters of discretion (to include the words "or sub transmission")

TLC sought a minor amendment to PC42 Rule 4b.5.3 so as to include reference to infrastructure standards for network utility assets which are not 'Council-owned'. TLC agree with and support the s42A report author's recommendation to include reference to non-council owned infrastructure standards – and thereby include the words "*and/or industry*" to **Rule 4b.5.X** in regard to Councils matters of discretion.

As contained within the recommended changes to PC42, TLC wish to confirm their support in regard to the above amendments.

TLC request that this letter please be tabled with the Independent Hearings Panel in support for the PC42 recommendations applicable to TLC.

Please do not hesitate to contact me if you have any queries regarding the above.

Yours sincerely



Tim Lester  
021 993223

[tim.lester@edison.co.nz](mailto:tim.lester@edison.co.nz)