

---

---

**Wairau/Awatere Resource Management Plan**

**Plan Change 61 – Minor Amendments**

**Submissions received by Marlborough District Council**

---

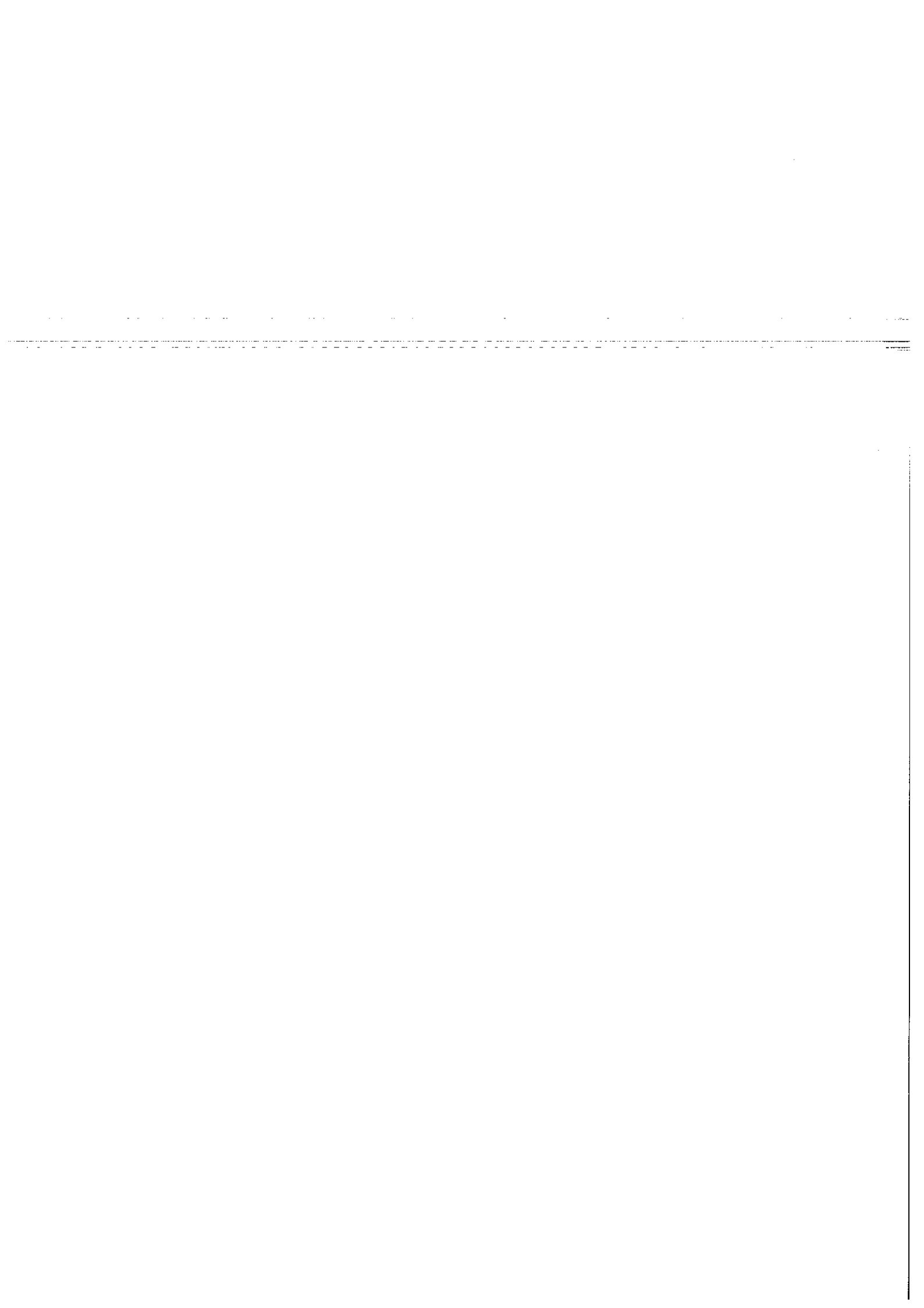
**December 2012**



## Table of Contents

Alphabetical index of Submitters (by surname) for Plan Change 61

Numerical index of Submitters for Plan Change 61



## Alphabetical index of Submitters (by surname) for Plan Change 61

PartNo	Submitter	Address
31	Awatere Water Users Group ( Guy Lissaman)	25 Old Ford Road RD 1 Seddon 7285
58	Beavon Investments Limited ( DJ Clark)	Wisheart Macnab & Partners PO Box 138 Blenheim 7240
61	Blind River Irrigation Limited ( Steve Wilkes)	WilkesRM Limited 76 High Street Blenheim 7201
39	Bradfield - Donald Sinclair	247 Scott Street Blenheim 7201
42	Brunton - William Ronald	98 Hospital Road Blenheim 7201
74	Buck - George Keith	43B Leefield Street Blenheim 7201
60	Caccimani - Tonino	73 Main Road Havelock 7100
12	Carter - Robin Stacy	66A Inkerman Street Renwick 7204
62	Clintondale Trust - Whyte Trustee Company Limited ( David Whyte)	Clintondale 42 Rapaura Road RD 3 Blenheim 7273
16	Coatbridge Limited ( Scott Rae William Adams)	1320 Northbank Road RD 5 Blenheim 7275
35	Constellation Brands Limited ( Vicki Nalder)	PO Box 186 Blenheim 7240

Index of Submitters

11	Conway - Ian William	328 Caseys Road RD 1 Seddon 7285
27	Daken - Tony Richard	259D Anakiwa Road RD 1 Picton 7281
15	Davidson - Janet Marjorie	2324 Queen Charlotte Drive RD 1 Picton 7281
53	Delegat's Wine Estate Ltd ( R Bala)	PO Box 305 Blenheim 7240
28	Elvy - John	Larksfield Cottage 34 St Leonards Road RD 1 Blenheim 7271
77	Evans - Richard Warwick	40 Percy Street Blenheim 7201
1	Falloon - Jonathon Andrew	Kennedys Road Hawkesbury Renwick 7272
22	Grant - Christine Helen	2 Ruthken Crescent Blenheim 7201
7	Griffiths - John Powick	64 Ferry Road Spring Creek Blenheim 7202
82	GS & FW Orchard Ltd ( Graeme Orchard)	25 Camerons Road RD 1 Seddon 7285
68	Guernsey Road Residents Association Incorporated ( M Leigh-Lancaster)	93 Guernsey Road RD 1 Blenheim 7271
9	Hannagan - Kaye	66A Inkerman Street Renwick 7202

Index of Submitters

37	Hanover - David Andrew	7 Weka Place Picton 7220
67	Herbert - John Wavell	2069 Queen Charlotte Drive Picton 7281
8	Hynds - Kenneth Edwin	29A Adams Lane Springlands Blenheim 7201
66	Jerrett - Sheridan	3324 State Highway 63 RD 1 Blenheim 7271
33	Kapiti Views Trust ( John Marris)	114 New Renwick Road RD 2 Blenheim 7272
63	Kevin and Linda Morgan ( Murray Hunt)	PO Box 925 Blenheim 7240
40	Kidwell - Jarred	172 Hospital Road Blenheim 7201
72	Lamb - Jeremy	7 Kinloch Crescent Blenheim 7201
21	Landfall Estate Limited ( Jeremy Laurenson)	PO Box 83 Renwick 7243
36	Lankshear - Bernard R	13 Kim Crescent Blenheim 7201
41	Lawson - Colleen	114 Hospital Road Witherlea Blenheim 7201
70	Lawson - John Roger	114 Hospital Road Witherlea Blenheim 7201

Index of Submitters

26	Leach - Bryan Foss	2324 Queen Charlotte Drive Ngakuta Bay RD 1 Picton 7281
79	Letbe - Heather Jillian	31 David Street Blenheim 7201
51	Lucas - Wayne Francis	23 Budge Street Blenheim 7201
30	Marama Irrigation Co Ltd ( David Robert Hammond)	581 Marama Road Seddon 7285
24	Marlborough Amateur Radio Club ( William G Cousins)	PO Box 432 Blenheim 7240
25	Marlborough District Council ( Mark Caldwell)	PO Box 443 Blenheim 7240
59	Marlborough Province of Federated Farmers of NZ ( Michael Bennett)	PO Box 1992 Christchurch 8140
29	Marlborough Vegetable and Process Growers Assoc ( Andrew Jones)	Starborough Foster Street Seddon 7210
81	Marlborough Winegrowers Association Incorporated ( Marcus Pickens)	PO Box 511 Blenheim 7240
55	Marr - Neville	PO Box 5158 Springlands Blenheim 7241
34	Marris - John Ernest & Alison Lillian	114 New Renwick Road RD 2 Blenheim 7272
75	Menzies - Keith John	7 Ross Lane Blenheim 7201



Index of Submitters

10	Neal - John Vernon	118 Budge Street Riversdale Blenheim 7201
64	New Zealand Association of Radio Transmitters ( Mike Newman)	30 Nikau Street Wanganui 4501
71	Nicoll - Robert Jacob	25 Selwyn Street Blenheim 7201
4	NZI of Surveyors Nelson/Marlborough Branch ( Phil Morton)	PO Box 380 Blenheim 7240
73	O'Neil - Mark	95A Alabama Road Blenheim 7201
65	Patchett - Fiona Mary	Hardy-Jones Clark PO Box 646 Blenheim 7201
47	Pope - Kevin	160 Howick Road Blenheim 7201
18	Rae - Stuart Nisbet	7B Mountain View Road Witherlea Blenheim 7201
54	Rarangi District Residents Association ( Beverley Doole)	19 Miro Street RD 3 Blenheim 7273
44	Rayaner - Phillip	15A Leitrim Street Blenheim 7201
20	Reddan - Jack	8 Brydon Street Renwick 7204
49	Reed - Oliver Joseph	10 Martin Terrace Witherlea Blenheim 7201

Index of Submitters

14	Rennie - Paul William Gordon	64 Park Terrace Blenheim 7201
46	Rice - Leslie John	67 Wither Road Blenheim 7201
80	Royal Forest and Bird Protection Society NZ (Inc) ( Debs Martin)	PO Box 266 Nelson 7040
2	Smith - Alan Walter	678 New Renwick Road RD 2 Blenheim 7272
76	Starborough Farming Company ( Andrew Jones)	2 Foster Street Seddon 7210
13	Stephens - Harry Ernest	128 Muller Road Blenheim 7201
17	Suleiman - Khalid	162 Howkick Road Witherlea Blenheim 7201
43	Taylor - Lloyd John	62 George Street Blenheim 7201
69	Tennent - Samuel	36 Mckenzie Street Blenheim 7201
32	Trelawne Farm Limited ( Richard Guy Lissaman)	25 Old Ford Road RD 1 Seddon 7285
19	TrustPower Limited ( Laura Marra)	Private Bag 12023 Tauranga 3143
5	van Antwerpen - Gerard	137 Vickerman Street Grovetown Blenheim 7202

Index of Submitters

57	van Asch Irrigation Limited (Geoffrey Edward van Asch)	PO Box 1003 Blenheim 7240
3	Wadsworth - Bronwyn Heather	279 Alabama Road RD 4 Blenheim 7274
38	Walding - John David Chass	8D Burden Street Redwoodtown Blenheim 7201
56	Webber - John	PO Box 11055 Ellerslie Auckland 1542
23	Whitaker - Dr Anthony John Trevor	10 Ruthken Crescent Blenheim 7201
6	Wilhelmus - Nigel	136 Maungatapur Road RD 2 Rai Valley 7192
78	WilkesRM Solutions Ltd	Temple Chambers 76 High Street Blenheim 7201
45	Wooding - Joshua Samuel	PO Box 4071 Redwood Village Blenheim 7242
48	Wooding - Maxwell George	PO Box 4071 Redwood Village Blenheim 7242
50	York - Robin William Francis	41A Nelson Street Blenheim 7201

## Numerical index of Submitters for Plan Change 60

PartNo	Submitter	Address
1	Falloon - Jonathon Andrew	Kennedys Road Hawkesbury Renwick 7272
2	Smith - Alan Walter	678 New Renwick Road RD 2 Blenheim 7272
3	Wadsworth - Bronwyn Heather	279 Alabama Road RD 4 Blenheim 7274
4	NZI of Surveyors Nelson/Marlborough Branch ( Phil Morton)	PO Box 380 Blenheim 7240
5	van Antwerpen - Gerard	137 Vickerman Street Grovetown Blenheim 7202
6	Wilhelmus - Nigel	136 Maungatapur Road RD 2 Rai Valley 7192
7	Griffiths - John Powick	64 Ferry Road Spring Creek Blenheim 7202
8	Hynds - Kenneth Edwin	29A Adams Lane Springlands Blenheim 7201
9	Hannagan - Kaye	66A Inkerman Street Renwick 7202
10	Neal - John Vernon	118 Budge Street Riversdale Blenheim 7201
11	Conway - Ian William	328 Caseys Road RD 1 Seddon 7285

Index of Submitters

12	Carter - Robin Stacy	66A Inkerman Street Renwick 7204
13	Stephens - Harry Ernest	128 Muller Road Blenheim 7201
14	Rennie - Paul William Gordon	64 Park Terrace Blenheim 7201
15	Davidson - Janet Marjorie	2324 Queen Charlotte Drive RD 1 Picton 7281
16	Coatbridge Limited ( Scott Rae William Adams)	1320 Northbank Road RD 5 Blenheim 7275
17	Suleiman - Khalid	162 Howkick Road Witherlea Blenheim 7201
18	Rae - Stuart Nisbet	7B Mountain View Road Witherlea Blenheim 7201
19	TrustPower Limited ( Laura Marra)	Private Bag 12023 Tauranga 3143
20	Reddan - Jack	8 Brydon Street Renwick 7204
21	Landfall Estate Limited ( Jeremy Laurenson)	PO Box 83 Renwick 7243
22	Grant - Christine Helen	2 Ruthken Crescent Blenheim 7201
23	Whitaker - Dr Anthony John Trevor	10 Ruthken Crescent Blenheim 7201

Index of Submitters

24	Marlborough Amateur Radio Club (William G Cousins)	PO Box 432 Blenheim 7240
25	Marlborough District Council (Mark Caldwell)	PO Box 443 Blenheim 7240
26	Leach - Bryan Foss	2324 Queen Charlotte Drive Ngakuta Bay RD 1 Picton 7281
27	Daken - Tony Richard	259D Anakiwa Road RD 1 Picton 7281
28	Elvy - John	Larksfield Cottage 34 St Leonards Road RD 1 Blenheim 7271
29	Marlborough Vegetable and Process Growers Assoc ( Andrew Jones)	Starborough Foster Street Seddon 7210
30	Marama Irrigation Co Ltd ( David Robert Hammond)	581 Marama Road Seddon 7285
31	Awatere Water Users Group ( Guy Lissaman)	25 Old Ford Road RD 1 Seddon 7285
32	Trelawne Farm Limited ( Richard Guy Lissaman)	25 Old Ford Road RD 1 Seddon 7285
33	Kapiti Views Trust ( John Marris)	114 New Renwick Road RD 2 Blenheim 7272
34	Marris - John Ernest & Alison Lillian	114 New Renwick Road RD 2 Blenheim 7272
35	Constellation Brands Limited ( Vicki Naider)	PO Box 186 Blenheim 7240

Index of Submitters

36	Lankshear - Bernard R	13 Kim Crescent Blenheim 7201
37	Hanover - David Andrew	7 Weka Place Picton 7220
38	Walding - John David Chass	8D Burden Street Redwoodtown Blenheim 7201
39	Bradfield - Donald Sinclair	247 Scott Street Blenheim 7201
40	Kidwell - Jarred	172 Hospital Road Blenheim 7201
41	Lawson - Colleen	114 Hospital Road Witherlea Blenheim 7201
42	Brunton - William Ronald	98 Hospital Road Blenheim 7201
43	Taylor - Lloyd John	62 George Street Blenheim 7201
44	Rayaner - Phillip	15A Leitrim Street Blenheim 7201
45	Wooding - Joshua Samuel	PO Box 4071 Redwood Village Blenheim 7242
46	Rice - Leslie John	67 Wither Road Blenheim 7201
47	Pope - Kevin	160 Howick Road Blenheim 7201

Index of Submitters

48	Wooding - Maxwell George	PO Box 4071 Redwood Village Blenheim 7242
49	Reed - Oliver Joseph	10 Martin Terrace Witherlea Blenheim 7201
50	York - Robin William Francis	41A Nelson Street Blenheim 7201
51	Lucas - Wayne Francis	23 Budge Street Blenheim 7201
53	Delegat's Wine Estate Ltd ( R Bala)	PO Box 305 Blenheim 7240
54	Rarangi District Residents Association ( Beverley Doole)	19 Miro Street RD 3 Blenheim 7273
55	Marr - Neville	PO Box 5158 Springlands Blenheim 7241
56	Webber - John	PO Box 11055 Ellerslie Auckland 1542
57	van Asch Irrigation Limited ( Geoffrey Edward van Asch)	PO Box 1003 Blenheim 7240
58	Beavon Investments Limited ( DJ Clark)	Wisheart Macnab & Partners PO Box 138 Blenheim 7240
59	Marlborough Province of Federated Farmers of NZ ( Michael Bennett)	PO Box 1992 Christchurch 8140
60	Caccimani - Tonino	73 Main Road Havelock 7100



Index of Submitters

61	Blind River Irrigation Limited ( Steve Wilkes)	WilkesRM Limited 76 High Street Blenheim 7201
62	Clintondale Trust - Whyte Trustee Company Limited ( David Whyte)	Clintondale 42 Rapaura Road RD 3 Blenheim 7273
63	Kevin and Linda Morgan ( Murray Hunt)	PO Box 925 Blenheim 7240
64	New Zealand Association of Radio Transmitters ( Mike Newman)	30 Nikau Street Wanganui 4501
65	Patchett - Fiona Mary	Hardy-Jones Clark PO Box 646 Blenheim 7201
66	Jerrett - Sheridan	3324 State Highway 63 RD 1 Blenheim 7271
67	Herbert - John Wavell	2069 Queen Charlotte Drive Picton 7281
68	Guernsey Road Residents Association Incorporated ( M Leigh-Lancaster)	93 Guernsey Road RD 1 Blenheim 7271
69	Tennent - Samuel	36 Mckenzie Street Blenheim 7201
70	Lawson - John Roger	114 Hospital Road Witherlea Blenheim 7201
71	Nicoll - Robert Jacob	25 Selwyn Street Blenheim 7201
72	Lamb - Jeremy	7 Kinloch Crescent Blenheim 7201

Index of Submitters

73	O'Neil - Mark	95A Alabama Road Blenheim 7201
74	Buck - George Keith	43B Leefield Street Blenheim 7201
75	Menzies - Keith John	7 Ross Lane Blenheim 7201
76	Starborough Farming Company (Andrew Jones)	2 Foster Street Seddon 7210
77	Evans - Richard Warwick	40 Percy Street Blenheim 7201
78	- WilkesRM Solutions Ltd	Temple Chambers 76 High Street Blenheim 7201
79	Letbe - Heather Jillian	31 David Street Blenheim 7201
80	Royal Forest and Bird Protection Society NZ (Inc) ( Debs Martin)	PO Box 266 Nelson 7040
81	Marlborough Winegrowers Association Incorporated ( Marcus Pickens)	PO Box 511 Blenheim 7240
82	GS & FW Orchard Ltd ( Graeme Orchard)	25 Camerons Road RD 1 Seddon 7285

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



**Submissions close 5.00 pm Friday, 21 December 2012**

**1. Submitter Details**

Full Name	Jonathan Andrew Falloon			
Organisation (if applicable)				
Contact Person (if applicable)	Jonathan Falloon			
Postal Address	15a Lower Watt Street			
	Wadestown			
	Wellington	Post Code	6 0 1	
Email	falloon@xtra.co.nz			
Telephone	Business	Home	44,999,664	
	Fax	Mobile	272,973,147	
Address for Service	Kennedys Road			
(if different from above)	Hawkesbury			
	Renwick	Post Code	7 2 7	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date	4/12/12

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

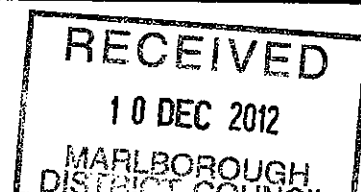
Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

1



**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Wairau/Awatere Resource Management Plan  
Definition of 'Family Flat'

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

See attached sheet.

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

Adopt option 2 for the definition of family flat - restriction on size only.

*Continue on a separate sheet if necessary*

## **My submission is ...**

I appreciate the need for greater clarity on what constitutes a family flat for the reasons outlined in the Section 32 Report. However, the inclusion of the family relationship criterion in the preferred option 4 introduces uncertainty of ongoing compliance considerations.

The test on whether the family flat provision fell within the permitted activities would be when a dwelling is built or when an alteration was made to an existing dwelling to create a family flat (including, e.g. extra kitchen facilities). What sorts of tests or verifications are envisaged to satisfy the Council that only family members will reside in the family flat? If at some point in the future a non-family member uses the family flat, does it cease to be a family flat and a resource consent become required for that occupation? This has the potential to be very intrusive, uncertain and a compliance burden for property owners and the Council given the variety of family situations. For example, if a dwelling is planned with provision for a family unit for an ageing parent and circumstances change so that the parent does not occupy the unit, would resource consent then be required? Another example is intending to use the family unit as holiday accommodation for family members. Is the accommodation of a friend then not permitted? Homestay for up to 5 visitors is a permitted activity for Rural Zones 3 & 4. Can the family flat then not be used for homestay?

The principle reason for the need for clarification outlined in the Report (page 2) is the appropriate scale of family flats. The 70m<sup>2</sup> floor area limit addresses this. If there is a risk that a secondary dwelling can be subdivided into its own Certificate of Title, then this will be an issue for existing buildings that should be addressed directly. As only one dwelling house per Certificate of Title is a permitted activity for Rural Zones 3 & 4 with the implication that the family flat must be within the dwelling structure, it is difficult to see how only having the floor area limit for family flats will open the opportunity for subdividing to a separate Certificate of Title. Introducing the definition of family flat as proposed does not appear to allow the erection of a family flat as a separate building as a permitted activity.

The proposed wording change is also written in the singular ('accommodate a family member') suggesting that accommodating 2 or more family members will not comply. This is unreasonable. The 70m<sup>2</sup> floor area limit sets a practical limit on family flat accommodation.

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm Friday, 21 December 2012

**1. Submitter Details**

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address   
  
 Post Code

Email

Telephone Business  Home   
 Fax  Mobile

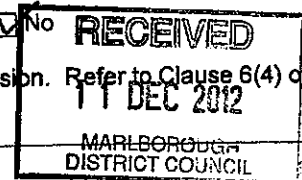
Address for Service   
 (if different from above)   
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter)  Date

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.



**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496  
Email: pc61@marlborough.govt.nz

For Office Use  
Submission No: 2

5. The specific parts of the proposed plan change the submission relates to are as follows:

Separate sheet attached

*Continue on a separate sheet if necessary*

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

~ ~ ~

*Continue on a separate sheet if necessary*

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

~ ~ ~

*Continue on a separate sheet if necessary*

The specific parts of the proposed plan change the submission relates to are: "Means a building of less than 70 square metres gross floor area used to accommodate a family member of a person residing in the principal residential unit on the property"

My submission is: I oppose the plan change.

I regard the concept of a family flat is beneficial to society and the family unit. When I received consent for a "granny house" in 1987 I was restricted to 100 square metres and in 1991 a 12 square metre extension was consented. A family flat needs to have independence and size. In my situation my parents moved from a substantial size house and the restrictive size meant much of their furniture had to be disposed of. It is also restrictive when family or friends stay. They had requested 170 square metres, which was declined to 100, and the principle dwelling, built in 1988, is in the 350 square metre vicinity. The 70 square metres MDC is specifying for a family flat is too small, it's not much larger than a family motel room. To give perspective, a production model Winnebago motor home is 40 square metres!

The concerns MDC have on an independent family flat as I see it are, 1/ a loss of productive land, 2/ reductions in rural ness, and 3/ subdivisions.

I find it a contradiction of MDC's above concerns when many permitted activities, some of which are not wholly rural based are allowed, and size is apparently not an issue with some. Resource consent is required for sub-division so that is already under MDC's control

I'd welcome relevant MDC staff to my property before the proposed 70 square metre plan change to discuss and show the benefits of a family flat and the downfalls of a restriction in size, and placement in relation to the principle dwelling.

I've chosen not to be heard in support of my submission. I feel it will fall on deaf ears. I consider no matter how many submissions against this proposal are presented, and as practical as some suggestions may be, MDC will just carry on with the plan change. This is my perspective of how MDC operates.

The decision I seek from Council is: I agree the definition of a family flat needs to be sorted out, but MDC is making the title too restrictive at 70 square metres, together with being close if not attached to the main dwelling. It is my opinion a "family flat" (dwelling) be a maximum size of 150 square metres and anywhere on the property visible from the main dwelling.

*Alan W. Smith*



Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Atwatare Resource Management Plan



MARLBOROUGH  
DISTRICT COUNCIL

Submissions close 5.00 pm Friday, 21 December 2012



1. Submitter Details

Full Name BRONWYN HEATHER WADSWORTH

Organisation (if applicable)

Contact Person (if applicable)

Postal Address 279 ALABAMA ROAD  
RD4  
BLenheim Post Code 7274

Email bron@baehus.co.nz

Telephone Business  Home 03 5775099  
Fax  Mobile

Address for Service   
(if different from above)   
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) BHW Date 12/12/12

2. Trade Competition

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes' to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

4. Return Submission to:

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496  
Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

3

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

*Continue on a separate sheet if necessary*

# Submission on Plan Change 61 – Minor Amendments to the Wairau / Awatere Resource Management Plan

## THE SPECIFIC PARTS OF THE PROPOSED PLAN CHANGE MY SUBMISSION RELATES TO ARE:

- Item 2 Definition of a 'Family Flat'
- Item 10 Wineries, distilleries, and breweries in rural environments
- Item 11 Amend the definition of 'Home Occupation' to reflect the intention that it can only be occupied by a member of the household, plus one additional person.

My submission is:

## ITEM 2 Definition of a 'Family Flat'

### ***I OPPOSE THIS PART OF THE PLAN CHANGE***

in PART.

### ***MY REASONS FOR OPPOSING THIS PART OF THE PLAN CHANGE***

The size prescribed (70m<sup>2</sup>) in the proposed change is restrictive and will not meet the requirements of some families in the district.

The size prescribed (70m<sup>2</sup>) in the proposed change does not allow for larger family flats on larger sized properties. A flat larger than 70m<sup>2</sup> (but smaller than the principal dwelling) on a title that is a number of ha large will not change unduly the amenity and character of the neighbourhood.

Some people will require a family flat to accommodate more than a single resident. In these instances, 70m<sup>2</sup> may be too small, especially on a large rural holding where the parents live in the main house, and their children and families live in a subsequent flat and all work at running the farm.

The stated reason of avoiding "*the risk that once established, a second dwelling could be subdivided onto its own Certificate of Title*" is not a valid reason. Subdivision is already controlled and the creation of a family flat on a title will not assist the title in being subdivided where the plan does not allow for further subdivision of the title (e.g. Rural Zone 3 not to be less than 8ha).

### ***THE DECISION I SEEK FROM COUNCIL IS***

Modify the wording to allow for a larger family flat were the title is over a certain size e.g. 4ha, provided that the family flat is "at least 10% less in floor size than the principal residential unit on the property".

**ITEM 10 Wineries, distilleries, and breweries in rural environments**

***I OPPOSE THIS PART OF THE PLAN CHANGE***

in FULL.

***MY REASONS FOR OPPOSING THIS PART OF THE PLAN CHANGE***

The current Plan does not provide for a beverage processing and production facility. It simply provides for retail and dining facilities for businesses that trade in alcohol related beverages and associated products.

A processing and / or production facility is vastly different to a retail and / or dining facility in regard to its effects on the environment in terms of noise, hours of operation, traffic density, waste discharge, building density and water usage.

It is important that the distinction between these two types of activities is maintained. This will ensure that production facilities require their own specific consent to be granted. As it stands at the moment, a retail facility can build a production facility on their site provided that they already have resource consent for the retailing aspect. This is a huge loop hole.

***THE DECISION I SEEK FROM COUNCIL IS***

To provide a definition for "Beverage Processing and / or Production facilities in rural environments", distinct from the existing definition for "Wineries, distilleries, and breweries in rural environments".

To add specific assessment criteria for "Beverage Processing and / or Production facilities in rural environments" to the Plan.

To modify the existing definition of "Wineries, distilleries, and breweries in rural environments" to allow for non alcoholic beverage production, or production of alcoholic beverages that do not fit within the existing definition.

**ITEM 11 Amend the definition of 'Home Occupation' to reflect the intention that it can only be undertaken by a member of the household, plus one additional person**

***I OPPOSE THIS PART OF THE PLAN CHANGE***

in PART:

***MY REASONS FOR OPPOSING THIS PART OF THE PLAN CHANGE***

With regard to the wording of the proposed change

*(a) Performed only by a member of the household residing in the dwelling unit or accessory building in which it is carried out;*

This wording can be interpreted as only a single person from the household being allowed to work in the home occupation. If it is indeed the intention to only allow a single member of the household to work in the Home Occupation, then this is restrictive and unreasonable. There are no additional impacts in allowing more than one member of the household to work in the Home Occupation.

With regard to the statement "*The person undertaking the home occupation is entitled to employ one additional person that does not normally reside in the dwelling unit or accessory building*",

- This restriction will not necessarily lead to the reasons that Council has given for the modification. Additional employees will not necessarily generate a level of activity out of keeping with the amenity and character of residential neighbourhoods. The nature of the home occupation is more likely to affect this. For example, a home occupation which is used as a base for a computer service technician may have the technician visiting 20 clients a day and returning to the property after each, where as a home occupation producing a craft product may have 4 employees who arrive at the property at the start of the day and leave at the end. This is 4 traffic movements with 4 staff as opposed to 20 traffic movements for the dwelling occupier.
- There is no provision for part time employees, such as cleaners.
- There are existing Home Occupations with more than 1 employee that have not "developed to a scale or intensity as would cause detriment to local residential character".

I note that resource consent could be applied for to allow the home occupation to employ more than one person, however I believe this is restrictive in a commercial sense for a home occupation business. Home Occupation businesses are generally small, with low margins, and they are businesses that need to move quickly as the economic climate changes. The process of applying for a Resource Consent can be expensive and time consuming and could result in the business folding through either the cost of the consent application or the time taken for it to be processed.

**THE DECISION I SEEK FROM COUNCIL IS**

Modify the wording to read *(a) Performed only by members of the household residing in the dwelling unit or accessory building in which it is carried out;*

Do not add "*The person undertaking the home occupation is entitled to employ one additional person that does not normally reside in the dwelling unit or accessory building*" as it provides additional restriction without achieving the stated objectives. The existing wording in the plan is sufficient.



MARBOROUGH DISTRICT COUNCIL

Submission on Plan Change 61 - Minor Amendments to the Wairau/Awatere Resource Management Plan

Submissions close 5.00 pm Friday, 21 December 2012

1. Submitter Details

Form fields for Submitter Details including Full Name (NEW ZEALAND INSTITUTE OF SURVEYORS - NELSON/MARBOROUGH BRANCH), Organisation, Contact Person (PHIL MORTON), Postal Address (P.O. Box 380, BLENHEIM 7240), Email (phil@gilberthaymes.co.nz), Telephone (Business: (03) 578 7984, Home: /, Fax: (03) 578 7709, Mobile: 021 431 190), Address for Service, Signature (P. Morton), and Date (13/12/2012).

2. Trade Competition

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission?  Yes  No

If you answered Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

4. Return Submission to:

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496  
Email: pc61@marlborough.govt.nz

For Office Use  
Submission No: 4

5. The specific parts of the proposed plan change the submission relates to are as follows:

ITEM 2 - DEFINITION OF FAMILY FLAT.  
ITEM 7.2. - CLARIFY THAT BUILDING PLATFORMS BE FREE FROM EASEMENTS AND YARD SETBACKS.  
ITEM 13 - EARTHWORK VOLUME LIMIT EXEMPTIONS.  
ITEM 7.4 (1) - CONTROLLED ACTIVITY - RULE 28.2.

*Continue on a separate sheet if necessary*

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

ITEM 2 - OPPOSE (SEE ATTACHED FOR REASONS)  
ITEM 7.2. OPPOSE IN FULL (SEE ATTACHED FOR REASONS)  
ITEM 13 OPPOSE (SEE ATTACHED FOR REASONS)  
ITEM 7.4(1) - OPPOSE - MISTAKENLY INCLUDED - NO CHANGES REQUIRED.

*Continue on a separate sheet if necessary*

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

ITEM 2 - SEE ATTACHED FOR CHANGES  
ITEM 7.2 - " " " "  
ITEM 13 " " " "  
ITEM 7.4(1) - REMOVE FROM PROPOSED CHANGES.

*Continue on a separate sheet if necessary*

**N.Z. INSTITUTE OF SURVEYOR – NELSON/MARLBOROUGH BRANCH**

**PROPOSED PLAN CHANGE NO 61**

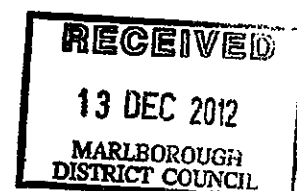
**ITEM 2**

1. The matter of most concern for Council has been that the construction of a family flat may be used as a reason for the subdivision of that dwelling and the creation of an additional title.
2. We believe that this concern be enunciated in the rule.
3. We have no objection to imposing a minimum building size – 80m<sup>2</sup> was previously used as a minimum, and is probably more appropriate.
4. There are already restriction relating to site coverage etc that will limit the number of allotments where family flats can be constructed.
5. We consider limiting the use of a family flat is not sensible use of housing stock.
6. There may be periods when such a dwelling is not occupied by a family member or dependent relative, and that unrestricted occupation should be permitted.
7. We believe that policing the use of family flats, and then the subsequent action that could result, will involve considerable cost and is unnecessary.
8. The construction cost of a family flat is significant, and it is unlikely that there will be a great demand for such accommodation.

We believe the rule should be amended to:

'Means a building of less than 80m<sup>2</sup> gross floor area used primarily to accommodate a family member or dependent person residing in the principal residential unit on the property.

The construction of a family flat does not provide a basis for the provision of a separate title by way of subdivision for that dwelling'.



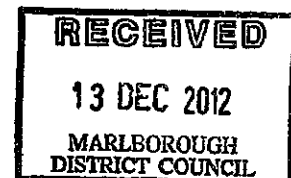


**N.Z. INSTITUTE OF SURVEYOR – NELSON/MARLBOROUGH BRANCH**

**PROPOSED PLAN CHANGE NO 61**

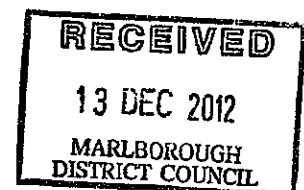
**ITEM 7.2**

1. For many years no difficulties were experienced with the current rule.
2. The building platform shape factor of a certain diameter circle within an allotment was used without restrictions.
3. In recent times Council sought to impose the rule by saying that the circle had to be clear of easements.
4. No allowance in this interpretation was given to the fact that no one builds a 'round or circular' house.
5. This meant if there was an easement, say 2.00 metres wide, there was still 13 metres remaining.
6. The proposed rule has now been extended to include any building set-back.
7. This has a serious effect on the future design and size of allotments.
8. The proposed rule is unworkable as building set-backs are not a fixed distance from the boundary, but relate to the recession planes, ie location, height and orientation of any future building.
9. It is, therefore, impossible when designing lots at the subdivision stage, to accurately determine what the minimum width of a lot will be.
10. The effect of the new rule is to essentially increase the 'minimum' width of new lots by at least 5 metres to accommodate the recession planes.
11. The rule change also changes the relationship between the building platform shape factor and the minimum frontage rule.
12. As stated in the Section 32 evaluation, Council have acknowledged that there will be additional costs as the result of this rule, which does not seem to be in line with current government policy relating to affordable housing and Council's stated intention to encourage development.
13. What isn't included is that the proposed change will result in a significant number of properties that currently can be subdivided will not be able to be subdivided due to the increased width requirement, eg currently an existing property with a width of 18 metres



in the Urban Residential 2 Zone can be considered for further subdivision, and under the new rule this will increase to at least 23 metres.

14. Historically, the building shape factor was rectangular, with a minimum area of 150m<sup>2</sup> and minimum dimension of 10 metres. In addition there were fixed side yard measurements totalling 5 metres, resulting in a total width of 15 metres.
15. This was the basis for establishing the current rule in the Plan.
16. In conclusion, if Council wishes to continue with the use of the circular shape factor, there should be no need to change the existing rule.
17. The Institute of Surveyors position is, if it is considered necessary, to clarify the existing rule.
18. Practitioners will always create allotments that are capable of containing a residential dwelling. It would be negligent to do otherwise.
19. If Council chooses to amend the District Plan as proposed, there are subsequent amendments to the District Plan that will be required to be addressed, ie rules relating to site density in all of the zones subject to a circular building platform shape factor.
20. We suggest the proposed change should read as, "The minimum building platform shape factor may be applied anywhere within the proposed allotment. NB The minimum building platform is inclusive of any easement located along a property boundary, or any building set-back and depth requirement required by zone rules".

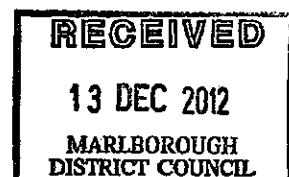


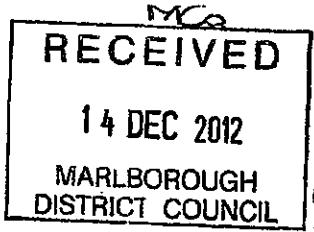
## **Wairau Awatere Resource Management Plan**

### **Proposed Plan Change No.61: Minor Amendments**

#### **Item 13 Earthwork volume limit exemptions.**

- 1) It is proposed to withdraw the exemptions relating to permissible earthworks in the Rural Residential and Central Business Zones. The present maximum allowable volume for either excavation or filling is 20m<sup>3</sup> over any two year period, meaning that any earthworks over that volume will require resource consent (discretionary activity).
- 2) It is considered that the 20m<sup>3</sup> limit is a ridiculously small amount, particularly in the Rural Residential Zones where allotment sizes are significant.
- 3) Many minor works will require resource consents. For example excavation for a swimming pool or a driveway in the Rural Residential Zone will almost certainly trigger the requirement for resource consent.
- 4) Presently the exemptions proposed to be removed provide the only means of undertaking minor excavation without need for additional resource consents.
- 5) The Urban Residential Zone has no such limit on excavation volume. The Rural Zones have no limit on excavation volume on ground under 20° slope.
- 6) The small maximum excavation allowance presently exacerbates conflict between neighbours over issues such as minor landscaping.
- 7) It is considered the 20m<sup>3</sup> maximum should be raised to 150m<sup>3</sup>, particularly if the exemptions are removed. By way of example this will allow a medium sized swimming pool to be placed or a driveway (50m long) or house footprint to be stripped. Rule 31.1.7.1.1 refers
- 8) It is considered that the time period applicable should be reduced to one year. This will mean that the above mentioned separate minor works can be undertaken within an acceptable building time zone. Rule 31.1.7.1.2 refers.
- 9) Significant earthworks relating to sloping ground or large areas will still be under the control of Council.
- 10) Alternatively it is suggested that there should be no maximum volume limit on land under 20° slope as per the adjoining Urban Residential and Rural Zones.





**MARLBOROUGH  
DISTRICT COUNCIL**

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**

**Submissions close 5.00 pm Friday, 21 December 2012**

**1. Submitter Details**

Full Name	GERARD VAN ANTWERPEN		
Organisation (if applicable)			
Contact Person (if applicable)			
Postal Address	137 VICKERMAN STREET		
	G ROVE TOWN		
	BLENHEIM	Post Code	7202
Email	gvanwerpen@gmail.com		
Telephone	Business	Home	
	03-5784299	03-7451102	
	Fax	Mobile	
		021-0399651	
Address for Service			
(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date
			13/12/12

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496  
Email: pc61@marlborough.govt.nz

For Office Use  
Submission No: 5

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (In full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

RECEIVED  
MCA  
14 DEC 2012  
MARLBOROUGH  
DISTRICT COUNCIL



MARLBOROUGH  
DISTRICT COUNCIL

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**

Submissions close 5.00 pm Friday, 21 December 2012

**1. Submitter Details**

Full Name

Organisation (if applicable)

Contact Person (if applicable)

Postal Address   
  
 Post Code

Email

Telephone Business  Home   
 Fax  Mobile

Address for Service   
 (if different from above)   
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter)  Date

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes' to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 620 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

6

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*



Submission on Plan Change 61 - Minor Amendments to the Wairau/Awatere Resource Management Plan



MARLBOROUGH DISTRICT COUNCIL

Submissions close 5.00 pm Friday, 21 December 2012

1. Submitter Details

Form fields for Submitter Details including Full Name (JOHN POWICK GRIFFITHS), Organisation, Contact Person, Postal Address (64 FERRY ROAD, SPRING CREEK, BLENHEIM), Email (J.GRIFFITHS@PARADISE.NET.NZ), Telephone (Business, Home, Fax, Mobile), Address for Service (AS ABOVE), and Signature (JP Griffiths) with Date (13-12-12).

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? [ ] Yes [x] No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? [x] Yes [ ] No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission? [x] Yes [ ] No

4. Return Submission to:

Attention Planning Technician Marlborough District Council PO Box 443 Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use Submission No:

7



**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

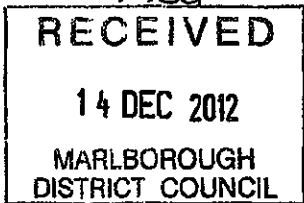
Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

MCo



MARLBOROUGH DISTRICT COUNCIL

Submission on Plan Change 61 - Minor Amendments to the Wairau/Awatere Resource Management Plan

Submissions close 5.00 pm Friday, 21 December 2012

1. Submitter Details

Full Name: **KENNETH EDWIN HYNDS**

Organisation (if applicable):

Contact Person (if applicable):

Postal Address: **29A ADAMS LANE**  
**SPRINGLANDS**  
**BLenheim** Post Code: **7291**

Email: **KENHYNDS@GMAIL.COM**

Telephone: Business: Home: **5792297**

Fax: Mobile: **027 2843683**

Address for Service: (if different from above):

Post Code:

Signature (of submitter or person authorised to sign on behalf of submitter):

Date: **13-12-2012**

2. Trade Competition

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

4. Return Submission to:

Attention Planning Technician  
 Marlborough District Council  
 PO Box 443  
 Blenheim 7240

Fax: 520 7496  
 Email: pc61@marlborough.govt.nz

For Office Use Submission No:

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

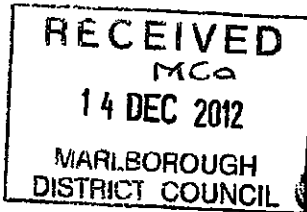
That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*



Submission on Plan Change 61 - Minor Amendments to the Wairau/Awatere Resource Management Plan



MARLBOROUGH DISTRICT COUNCIL

Submissions close 5.00 pm Friday, 21 December 2012

1. Submitter Details

Form fields for Submitter Details: Full Name (Kaye Harroger), Organisation, Contact Person, Postal Address (66A Inkerman Street, Renwick), Post Code (7202), Email (Katznkaye@slingshot.co.nz), Telephone (Business, Home: 5727056, Fax, Mobile), Address for Service, Signature, Date (14/12/12)

2. Trade Competition

Could you gain an advantage in trade competition in making this submission? [ ] Yes [x] No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission? [x] Yes [ ] No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission? [x] Yes [ ] No

4. Return Submission to:

Attention Planning Technician Marlborough District Council PO Box 443 Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use Submission No:

9

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is:** *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

I oppose the proposed submission that utility provisions apply to "requiring authorities" as suggested in the Resource Management Plan

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is:** *(where amendments are sought, provide details of what changes you would like to see)*

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

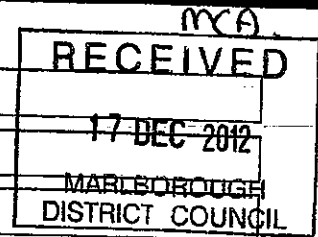
**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



**MARLBOROUGH  
DISTRICT COUNCIL**

Submissions close 5.00 pm Friday, 21 December 2012

**1. Submitter Details**



Full Name: JOHN VERNON NEAL

Organisation (if applicable): —

Contact Person (if applicable): —

Postal Address: 118 BUDGE STREET  
—  
—  
BLenheim Post Code 7201

Email: john.pam@extra.co.nz

Telephone Business: — Home: 03-5777-442  
Fax: — Mobile: 021-162-4061

Address for Service: as above.  
(if different from above) —  
— Post Code —

Signature (of submitter or person authorised to sign on behalf of submitter): John Neal Date: 17 Dec 2012

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

**[REDACTED]**  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496  
**[REDACTED]**

For Office Use  
Submission No: 10

5. The specific parts of the proposed plan change the submission relates to are as follows:

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

Continue on a separate sheet if necessary

6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)

I request that amateur radio is included in the "requiring authorities" section of the Resource Management Plan.  
Amateur Radio ('Hams') is a service hobby which provides communications in remote & disaster areas where civil networks are overloaded or inoperative. A 'Ham' generally has the resources to 'get signals through', but they need antennae. Any restrictions on normal ham assets as antennae, restricts their ability.

Continue on a separate sheet if necessary

7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

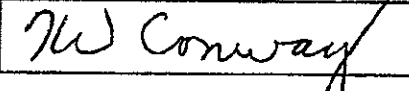
Continue on a separate sheet if necessary

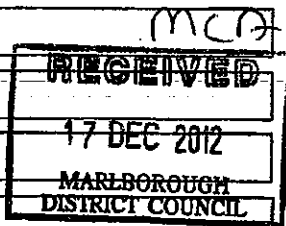
**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



**Submissions close 5.00 pm Friday, 21 December 2012**

**1. Submitter Details**

Full Name	Ian William Conway		
Organisation (if applicable)			
Contact Person (if applicable)	Self		
Postal Address	328 Caseys Road		
	RD1 Seddon		
	MARLBOYOUUGH	Post Code	7, 2 8
Email	tine.ian@farmside.co.nz		
Telephone	Business	Home	35,757,114
	Fax	Mobile	276,613,634
Address for Service			
(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date
			15/12/12



**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes' to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

11



**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is:** *(state the nature of your submission whether you support or oppose (in full or in part) specific provisions)*

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is:** *(where amendments are sought, provide details of what changes you would like to see)*

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

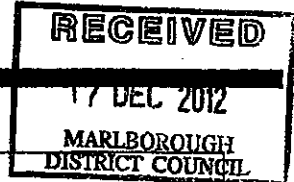
Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm Friday, 21 December 2012



1. Submitter Details

Full Name Robin Stacey Carter

Organisation (if applicable)

Contact Person (if applicable)

Postal Address 66 A Inkerman St  
Renwick  
 Post Code 7204

Email rob.c@slingshot.co.nz

Telephone Business  Home 5727086  
Fax  Mobile 027 44434006

Address for Service   
(if different from above)   
 Post Code

Signature (of submitter or person authorised to sign on behalf of submitter) [Signature] Date 17/12-12

mca

2. Trade Competition

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission?  Yes  No

4. Return Submission to:

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

12

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



Submissions close 5.00 pm Friday, 21 December 2012

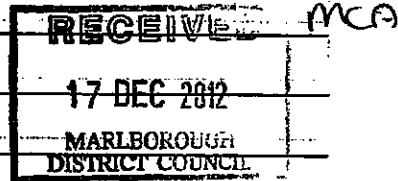
**1. Submitter Details**

Full Name Harry Ernest Stephens Z44NES

Organisation (if applicable) MARCB Radio Club

Contact Person (if applicable) \_\_\_\_\_

Postal Address 128 Muller Road  
Blenheim



Post Code 7201

Email \_\_\_\_\_

Telephone Business \_\_\_\_\_ Home 03-5784245

Fax \_\_\_\_\_ Mobile 027-201-8989

Address for Service (if different from above) \_\_\_\_\_

Post Code \_\_\_\_\_

Signature (of submitter or person authorised to sign on behalf of submitter) [Signature] Date 17.12.12

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496  
Email: pc61@marlborough.govt.nz

For Office Use  
Submission No: 13

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

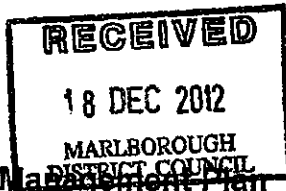
Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan



Submissions close 5.00 pm Friday, 21 December 2012

1. Submitter Details

Full Name: PAUL WILLIAM GOROON RENNIE

Organisation (if applicable):

Contact Person (if applicable):

Postal Address: 64 PARK TERRACE  
BLenheim

Post Code: 7201

Email: paul.sharon@che.co.nz

Telephone Business: Home 03-578-5311  
Fax: Mobile 0274-589-740

Address for Service:

(If different from above):

Post Code:

Signature (of submitter or person authorised to sign on behalf of submitter): P. Rennie Date: 17-12-12.

2. Trade Competition

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

4. Return Submission to:

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

14

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

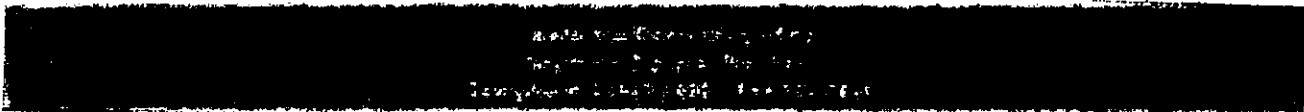
That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*





MARLBOROUGH DISTRICT COUNCIL

Submission on Plan Change 61 - Minor Amendments to the Wairau/Awatere Resource Management Plan

Submissions close 5.00 pm Friday, 21 December 2012

1. Submitter Details

Full Name: Janet Marjorie Davidson

Organisation (if applicable):

Contact Person (if applicable):

Postal Address: 2324 Queen Charlotte Drive, RD1 Picton

Post Code: 7281

Email: ngakuta2@xtra.co.nz

Telephone Business: Home: 03 573 5540

Fax: Mobile: 021 077 2035

Address for Service: as above

(if different from above):

Post Code:

Signature (of submitter or person authorised to sign on behalf of submitter): *Jan Davidson* Date: 16/12/2012

2. Trade Competition

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

3. Council Hearing

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission?  Yes  No

4. Return Submission to:

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

15



**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan change number 61  
Clarify that utility provisions apply to 'requiring authorities'.

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the proposed submission that utility provisions apply to "requiring authorities"

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

That the amateur radio service be included in the utility provisions, along with the requiring authorities, with regard to antenna and their supporting structures.

Antenna and their supporting structures for the purpose of Amateur Radio, be regarded under the utilities provisions.

I seek to include the Amateur Radio Service along with the 'requiring authority', so that the existing requirements can continue to apply to Amateur Radio antenna structures.

Amateur Radio Service operators take an active part in Search and Rescue events, as well as providing communications for numerous community and sports events. Operators played an important role in the recent Christchurch Civil Defence operations at the time of the recent earthquakes and subsequent activities. Not including the Amateur Radio antennas along with the supporting structures in the utility provisions, will limit the opportunities for the growth and expansion of the hobby. Additionally it may hamper the communications role that has been so valuable in emergency situations.

*Continue on a separate sheet if necessary*

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



**Submissions close 5.00 pm Friday, 21 December 2012**

**1. Submitter Details**

Full Name	SCOTT RAE WILLIAM ADAMS		
Organisation (if applicable)	COATBRIDGE LIMITED		
Contact Person (if applicable)			
Postal Address	COATBRIDGE, 1320 NORTHBANK ROAD,		
	RD 5		
	BLenheim	Post Code	7, 2, 7
Email	coatbridge@actrix.gen.nz		
Telephone	Business 5,728,544	Home	5,728,544
	Fax 5,728,594	Mobile	
Address for Service			
(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)		Date	17/12/12

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered "Yes to being heard, would you be prepared to consider presenting a joint joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

16

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Item 1: Policy on term of water permits to take and use water

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

Item 1: Oppose. Leave as status quo leaving terms of up to 30 years.

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

Item 1: Leave as is.

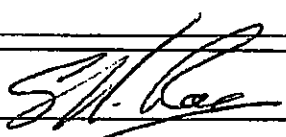
*Continue on a separate sheet if necessary*

**Submission on Plan Change 61 -  
Minor Amendments  
to the Wairau/Awatere Resource Management Plan**



**Submissions close 5.00 pm Friday, 21 December 2012**

**1. Submitter Details**

Full Name	Stuart Nisbet Rae		<b>RECEIVED</b> <b>18 DEC 2012</b> MARLBOROUGH DISTRICT COUNCIL
Organisation (if applicable)			
Contact Person (if applicable)			
Postal Address	7B Mountain View Road		
	Witherlea		
	BLENHEIM	Post Code	7201
Email	s_rae@slingshot.co.nz		
Telephone	Business	Home	35,789,160
	Fax	Mobile	277,639,946
Address for Service	(As above)		
(if different from above)			
		Post Code	
Signature (of submitter or person authorised to sign on behalf of submitter)			Date 18th December 2012

**2. Trade Competition**

Could you gain an advantage in trade competition in making this submission?  Yes  No

If you answered yes, please note that there are restrictions on your ability to make a submission. Refer to Clause 6(4) of the First schedule of the RMA for further information.

**3. Council Hearing**

Do you wish to be heard in support of your submission?  Yes  No

If you answered 'Yes to being heard, would you be prepared to consider presenting a joint case with others who have made a similar submission?  Yes  No

**4. Return Submission to:**

Attention Planning Technician  
Marlborough District Council  
PO Box 443  
Blenheim 7240

Fax: 520 7496

Email: pc61@marlborough.govt.nz

For Office Use  
Submission No:

18

**5. The specific parts of the proposed plan change the submission relates to are as follows:**

Plan Change #61 : Item 6. Clarify the utility provisions apply to "requiring authorities".

*Continue on a separate sheet if necessary*

**6. My submission is: (state the nature of your submission whether you support or oppose (in full or in part) specific provisions)**

I oppose the alteration of the meaning of Section 27.5 which will define "utility" in Chapter 26 as "... a network utility operation undertaken by a requiring authority ...". To do so would remove the existing right of private individuals and businesses to undertake the construction of any form of aerial and its support structure. This is currently a permitted activity under Section 27.5.1.2 of the plan. In consequence, this is not a "Minor Amendment" as publicly advised by Council in its November 22nd letter to ratepayers, and could have serious implications for current and future Licenced Spectrum Users, as defined in Part 6, Section 49, of the Radio Communications Act 1989. The proposed amendment might also be interpreted as meaning that any form of aerial structure, (including satellite receiving antennas), would become a discretionary activity, requiring resource consent.

In addition the proposed amendment to the plan would give an inequitable and unfair advantage for network utility operators, as requiring authorities, in relation to private individuals and businesses.

This does not appear to have been the intent of the Resource Management Act in making provision for approved "network utility operators" and "requiring authorities".

*Continue on a separate sheet if necessary*

**7. The decision I seek from Council is: (where amendments are sought, provide details of what changes you would like to see)**

My objection would be met by the Council abandoning this particular proposed plan amendment.

Alternatively my objection would be also met by altering the proposed amendment to read:

"Means a network utility operation undertaken by a requiring authority as these terms are defined in Section 166 of the Resource Management Act 1991, or a Licenced Spectrum User as defined in Part 6 Section 49 of the Radio Communications Act 1989."

*Continue on a separate sheet if necessary*

FORM 5

**SUBMISSION ON PROPOSED PLAN CHANGE 61 TO THE WAIRAU AWATERE  
RESOURCE MANAGEMENT PLAN PURSUANT TO CLAUSE 6 OF THE FIRST  
SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**



**To:** Marlborough District Council  
PO Box 443  
**BLenheim 7240**  
Attention: Planning Department

**Name:** TrustPower Limited

**Address:** Private Bag 12023  
**TAURANGA**

1. This is a submission by TrustPower Limited ('TrustPower') on Proposed Plan Change 61 – Minor Amendments ('the Plan Change') to the Wairau Awatere Resource Management Plan.
2. TrustPower could not gain an advantage in trade competition through this submission.
3. **The specific provisions of the proposed Plan Change that TrustPower's submission relates to is:**  
As set out in Table 1, TrustPower's submission relates to:
  - Item 1 – Policy on term of water permits to take and use water.
  - Item 6 – Clarify that utility provisions apply to "requiring authority".
  - Item 8 – Include rules for the damming of water.
4. **TrustPower's submission is:**  
*TrustPower's General Interest in Proposed Plan Change 61*  
Overall the reasons for TrustPower's interest in the proposed Plan Change are as follows:

- a) Plan Change 61 ("PC61") introduces a number of changes within the District Plan. For the reasons set out below, TrustPower is of the view that these changes may have the potential to affect its interest in maintaining and enhancing efficient electricity generation and transmission.
- b) TrustPower has grown to become one of New Zealand's largest electricity retailers, serving just under a quarter of a million customers throughout the country utilising predominately renewable energy generation. TrustPower is committed to responsible and effective energy generation and to applying industry best practice to these activities. It acknowledges the importance of the environment to its continued operations, and has adopted a set of environmental policies which encourage the practical minimisation of any adverse environmental impacts associated with the company's activities. TrustPower's generation assets consist of 34 small to medium sized generation stations strategically located around New Zealand to ensure power is generated close to where it is consumed.
- c) Within the jurisdiction of the Wairau Awatere Resource Management Plan, TrustPower owns and operates two hydroelectric power schemes ('HEPS'). The first is the Waihopai Scheme, which first supplied power to Blenheim in 1927 and was subsequently expanded to meet growing demand in 1930, 1937 and 1996, increasing the original output capacity from 1,000kw to 2,500kw.
- d) The second is the Branch Scheme, in which water first passes first through the 3.8-MW Argyle Power Station and is then carried by a 3,385m canal to the 7.2MW Wairau Power Station. Overall the two schemes provide 13.4MW of electricity to the Marlborough Region and then on to the national grid.
- e) In addition, TrustPower holds resource consent for the proposed Wairau Hydro Electric Power Scheme. This scheme will form an extension to the existing Branch Scheme, by diverting part of the Wairau River flow into the Branch and channelling the water through interconnecting canals and penstocks to six new power stations space down the Wairau valley.
- f) TrustPower is also interested in District Planning with respect to future electricity generation resources and consequently electricity transmission. On this basis, TrustPower has a close interest in the development of these provisions.

*TrustPower's Submission:*

Please refer to Table 1.

5. **TrustPower seeks the following decision from the local authority:**
- a) That the amendments outlined in Table 1 be accepted;
  - b) Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in TrustPower's submission (Table 1);
  - c) That, in the event that the amendments set out in Table 1 are not accepted, that the Plan Change be withdrawn.

6. TrustPower does wish to be heard in support of its submission.

If others make a similar submission, TrustPower will consider presenting a joint case with them at a hearing.

**Signature:**



---

TrustPower Limited  
By its authorised agent Laura Marra, for and on behalf of  
TrustPower Limited

**Date:** 19<sup>th</sup> December 2012

**Address for service:** TrustPower Limited  
Private Bag 12023  
**TAURANGA**

**Telephone:** (07) 574 4888 ext 4304

**Facsimile:** (07) 574 4877

**Email:** [laura.marra@trustpower.co.nz](mailto:laura.marra@trustpower.co.nz)

**Contact Person:** Laura Marra



Table 1: TrustPower's Submission on proposed PC61 to the Wairau Awatere Resource Management Plan

<p>Item 1 – Policy on term of water permits to take and use water.</p> <ul style="list-style-type: none"> <li>- Amend Policy 6.3.1.1.</li> <li>- Amend the explanation to the policies under Section 6.3.1</li> </ul>	<p>Oppose</p>	<p>The proposed amendments give the Council the opportunity to reassess the water allocation limits at more regular intervals than the 30 years promoted by the current policy. While TrustPower agrees that a 30 year consent term may not be appropriate in all circumstances, it is TrustPower's view that in some circumstances a term greater than 10 years is appropriate. Particularly where significant investment is required, such as the case for infrastructure development.</p> <p>TrustPower submits that consent authorities already have discretion to limit the term for which a consent is granted under the Act, and this is to be assessed on a case by case basis, and determined on the merits of any given application. Limiting all water permits to a maximum term of 10 years may not always be in the best interests of achieving sustainable management and promoting such a limit on consent term is arbitrary.</p> <p>The Council should therefore continue to be able to grant water permits for the maximum period specified in the Act, and make a decision on the appropriate length of time for individual permits on a case-by-case basis.</p>	<p>That, rather than specifying a timeframe the Council will grant water permits for the policy is reworded so that the term of individual water permits can be considered on a case-by-case basis.</p>
<p>Item 6 – Clarify that utility provisions apply to "requiring authority"</p> <ul style="list-style-type: none"> <li>- Insert the following definition of "utility" into Chapter 26 of the WARMP "<u>means a network utility operation undertaken by a requiring authority as those terms are defined in Section 166 of the Resource Management Act 1991.</u>"</li> </ul>	<p>Oppose</p>	<p>The s32 report states that the intention of the utilities rules is that they should only apply to network utility operators and not private individuals or businesses.</p> <p>TrustPower opposes this on the basis that not all network utility operators are requiring authorities and thus as proposed, the utility rules would no longer apply to all network utility operators. In addition, many network utility operators are private businesses, so the purpose of the changes as stated in the s32 report is not achieved.</p> <p>Regardless of this fact, TrustPower does not agree that the changes sought in the s32 report on this matter are appropriate as the plan should seek to manage effect rather than by ownership type. If the proposed definition is included in the plan then the utility provisions should be amended to provide for all infrastructure (as defined in the RMA).</p> <p>Moreover, some network utility operators are requiring authorities for certain functions (i.e. TrustPower is only a requiring authority for the supply of line function services). Therefore only components of some network utility operations activities will be provided for by these rules.</p>	<p>That the proposed definition and effect of limiting the utility chapter to requiring authorities is rejected.</p> <p>Alternatively, that the utility chapter is expanded to also provide for infrastructure (as defined in the RMA).</p>

<p>As TrustPower can only designate its lines / transmission related activities, the utility rules would not apply for other associated activities. These may include for example weather recording stations, sub-stations, utility buildings, ancillary buildings, and vegetation trimming and clearance associated with maintenance. It is not clear which rules in the Plan would instead apply to such activities.</p> <p>In TrustPower's view this would be unreasonable and cumbersome to plan users. The plan should provide for and seek to manage all utilities and infrastructure in a consistent manner.</p>		<p>That these changes are accepted provided that the following minor amendment is made to the text following the heading "Rule 27.1.6"</p> <p><i>A consent for the construction of any dam <u>and the associated damming of water</u>, does not cover the taking, use, <del>damming</del>, or diversion of water controlled under Section 14 of the Act. A separate water permit will be required for the taking, use, diversion <del>or damming</del> of water associated with a dam <u>and the damming of water.</u></i></p>
<p>Item 8 – Include rules for the damming of water</p> <ul style="list-style-type: none"> <li>- Add to the title of Rule 27.1.6</li> <li>- Amend the text that follows Rule 27.1.6</li> <li>- Amend Rule 27.1.6.1</li> <li>- Amend Rule 27.1.6.2</li> <li>- Amend Rule 27.1.6.3</li> <li>- Amend Rule 27.1.6.4</li> </ul>	<p>Support in part</p>	<p>The s32 report states that the Plan has rules for constructing a dam as a land use but not the associated damming of water. Therefore, rules permitting the damming of water should be introduced to remove the unnecessary consenting requirements. For consistency, it is appropriate that the status of damming water is the same as that for the construction of a dam.</p> <p>TrustPower agrees with the s32 report that these changes will "streamline the consent process and reduce costs associated with unnecessary consents".</p> <p>TrustPower has however identified a potential grammatical error resulting from the addition of the words "and the damming of water" to the text that follows the heading "Rule 27.1.6". TrustPower is concerned that this may have implications for interpretation as the current drafting suggests that a separate water permit will be required for the damming of water, which is at odds with the rest of the changes proposed. TrustPower proposes the following minor amendment to address this concern (change in bold):</p> <p><i>A consent for the construction of any dam <u>and the damming of water</u>, does not cover the taking, use, <del>damming</del>, or diversion of water controlled under Section 14 of the Act. A separate water permit will be required for the taking, use, diversion <del>or damming</del> of water associated with a dam <u>and the damming of water.</u></i></p>

17-12-2012.

M<sup>r</sup> MARK CALDWELL.

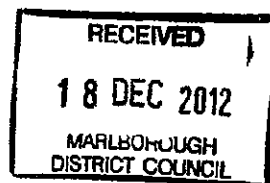
MARLBOROUGH DISTRICT COUNCIL

SEYMOUR ST.

BLENHHEIM.

SUBJECT.

SUBMISSION RE THE "WAIRAU AWATERE" RESOURCE  
MANAGEMENT PLAN".



DEAR SIR,

AS YOU ARE ALREADY AWARE OF, MY  
INTEREST IN A SECTION OF THE EXISTING ONE,  
BEING 27.5 RULES RELATING TO UTILITIES,

PERMITTED ACTIVITIES AND WHO CAN CARRY  
OUT WHAT.

AS A CONTRACTOR BEING ASKED TO QUOTE  
FOR A POWER LINE TO CROSS OVER THE SO CALLED  
FLAXBOURNE RIVER, I ENCOUNTERED OPPOSITION  
TO WORK BECAUSE OF THE PERMITTED ACTIVITIES,  
AND PERMITTED SO CALLED UTILITIES IN THIS AREA.

I SPENT QUITE A LOT OF TIME VISITING  
THE SITE, WORKING OUT A CONSTRUCTION PATH, AND  
THE TECHNICAL REQUIREMENTS FOR BOTH THE ROAD  
CROSSING AND OBTAINING APPROVAL FROM THE LOCAL  
LINE COMPANY, WHO WOULD ADD THIS PROPOSED LINE  
EXTENSION TO THEIR ASSETS, AND BE RESPONSIBLE  
FOR ANY FUTURE MAINTENANCE.

A COPY OF BOTH APPROVALS ARE WITH THIS  
LETTER.

UNTIL 1984 UNDER REGULATION 10 OF THE  
ELECTRICITY REGULATIONS ONLY POWER BOARDS (AS  
THEY WERE AT THAT TIME) WERE ALLOWED TO  
CONSTRUCT LINES. AFTER 1984 THE MONOPOLY  
ENJOYED BY LINE COMPANIES WAS REMOVED TO  
BRING COMPETITION INTO THE INDUSTRY.

20

2/

OUR SMALL COMPANY HAS BEEN QUOTING AND DOING THIS SORT OF WORK FOR OVER 20 YEARS, WORKING ALL OVER MARLBOROUGH, AND THIS IS THE FIRST TIME WE HAVE COME ACROSS A BLOCKAGE TO A PRIVATE CONTRACTOR'S WORK.

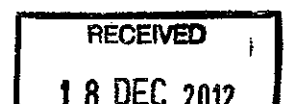
THE WHOLE REDICULOUS EPISODE WAS CERTAINLY FRUSTRATING TO ME BECAUSE OF ALL THE WASTED TIME AND ENERGY INVOLVED, SO I DECIDED TO INVESTIGATE FURTHER. I DID HAVE CONTACT WITH ONE OF YOUR CATCHMENT SUPERVISORS, WHO WAS OBVIOUSLY VERY EXPERIENCED AND SENSIBLE TO TALK TO. MY EXPERIENCE WITH THE REST OF THE COUNCIL PAPER PUSHERS WAS NOT GREAT, BUT I WON'T DWELL ON IT HERE, EXCEPT TO ADD THAT AN ALMOST IDENTICAL JOB, CROSSING A WATER COURSE IN THE PARA AREA, WENT AHEAD WITHOUT ANY OF THE PROBLEMS I ENCOUNTERED.

I AM NOT AWARE HOW OTHER DISTRICT COUNCILS WOULD VIEW THIS SITUATION, BUT I WOULD ADD THAT THERE WOULD BE A CONSIDERABLE NUMBER OF PRIVATE COMPANIES NOW QUALIFIED AND ABLE TO DO THIS WORK THROUGHOUT THIS COUNTRY, CERTAINLY MANY MORE THAN THE 28 LINE COMPANIES NZ WIDE.

IT ALSO IS PERMITTED FOR A RURAL LAND OWNER TO OWN THEIR OWN PRIVATE HIGH VOLTAGE INSTALLATION, IE LINE AND TRANSFORMER PAST THEIR OWN LEGAL PROPERTY BOUNDARY WHICH IS TERMED THE "POINT OF SUPPLY". COUNCIL CAN CHECK THIS AT "ENERGY SAFETY" MINISTRY OF ECONOMIC DEVELOPMENT.

THIS FACT IS VERY SELDOM CONVEYED LOCALLY. THERE ARE OF COURSE PRIVATE LINES IN MARLBOROUGH.

SO MY CHALLENGING OF THIS RULE THAT ONLY A COMPANY CLASSED AS A UTILITY, IN THE COUNCIL'S EYES CAN DO THIS SORT OF WORK, IS ANTI COMPETITIVE, AND LEADS TO A MONOPOLY SITUATION, THAT AS PREVIOUSLY STATED WAS REMOVED IN 1984.



3/  
TO PROGRESS THIS COMPLAINT IT WOULD NEED TO BE FORWARDED TO THE ANTI COMPETITIVE DIVISION OF THE COMMERCE COMMISSION, WHO FROM PREVIOUS EXPERIENCE MOVE AT THE RATE OF A TORTOISE WITH A BROKEN LEG, SO WHY BOTHER.

THE OTHER ASPECT IS THE ABILITY OF A LAND OWNER TO OWN HIS OWN HIGH VOLTAGE SUPPLY, EITHER AERIAL OR UNDERGROUND, SO IT IS NOT MAINTAINED BY THE LINE COMPANY, BUT BY PRIVATE MEANS. REQUIRES CERTIFYING EVERY FIVE YEARS. HOW DOES THIS SCENARIO TIE IN WITH YOUR PLAN?

AS I HAVE PREVIOUSLY SAID, THIS IS NOT ABOUT MYSELF PERSONALLY, BUT REALLY ANY PRIVATE COMPANY THAT COULD MOVE IN TO WORK IN SUCH A SITUATION.

THE LAND OWNER INVOLVED KNOWS NOTHING OF THIS SITUATION AS I HAVE PURSUED IT, TO RIGHT, WHAT I CONSIDER IS A WRONG.

I BELIEVE THAT WE LACK THE NUMBERS OF QUALIFIED PEOPLE IN ALL FIELDS IN THIS COUNTRY, BUT HAVE BUREAUCRACY OUT OF CONTROL, PURVEYED BY AN ARMY OF PAPER PUSHERS, STIFLING PROGRESS.

JACK REDDAN . 8 BRYDON ST RENWICK  
5728227 027-2667-239.

→ I HOPE YOU WILL EXCUSE THIS ROUGH DRAFT, MY PRINTER IS PRESENTLY OUT OF ACTION. JFR



A DICTIONARY DESCRIPTION  
OF THE WORD "UTILITY".

REFERENCE

"FUNK AND WAGNALLS" INTERNATIONAL EDITION  
"UTILITY".

FITNESS FOR SOME DESIRABLE, PRACTICAL  
PURPOSE:

SERVICEABLENESS, ALSO THAT WHICH  
IS NECESSARY.





Ministry for the  
**Environment**  
Manatū Mō Te Taiao

18 JAN 2012

DEPT 00260

Jack Reddon  
Patredix Power Services Ltd  
8 Brydon Street  
RENWICK 7204

\* NOTE

SHOW MARK CALDWELL

Dear Mr Reddan

### Resource consent requirements for a power pole in the Marlborough District

Thank you for your letter of 2 December 2011 regarding the Marlborough District requirement for resource consent for a power pole adjacent to a creek.

Upon reading your letter and the accompanying information it is clear that the main reason for the requirement for a resource consent is that the proposed power pole is to be located within or near to a river bed, creek or drainage channel. As you will be aware, while some creeks and drainage channels remain dry the majority of the time they can fulfil a very important function during times of heavy rainfall and flash flooding.

While the Resource Management Act 1991 (RMA) deals with utility networks and other infrastructure matters, the RMA also deals with issues relating to flooding hazards as well as general water body management. While it may be unlikely that there is any additional hazard risk as a result of the power pole, this is still something the council may need to consider as part of the resource consent process.

Marlborough Lines Limited are a Requiring Authority under the RMA and therefore may not have needed resource consent for a similar type work if they used the notice of requirement and designations process of the RMA instead. I have included a booklet explaining these processes for your information.

You have obviously been working in the lines industry for some time and have a number of years experience in these matters. I would encourage you to consider becoming involved and submitting on any future review of the Marlborough District Council planning documents if you consider regulation is still too restrictive.

In the meantime, I encourage you to contact the Marlborough District Council in relation to the required resource consent –you may be able to work with the council to come to a mutually agreeable engineering solution.

Yours sincerely

Amanda Moran  
Acting Manager, Resource Management Practice Team



Environment House  
23 Kate Sheppard Place  
PO Box 10362  
Wellington 6143, New Zealand  
Phone +64 4 439 7400 Fax +64 4 439 7700 www.mfe.govt.nz

Document ID: 000001113336

REFERENCE MR MARK CALDWELL M.D.C.

30 1 2012.

ROUGH DRAFT

Amanda Moran

OFFICE COPY

Resource Management Practice Team.

p.o.box 10362

Wellington 6143.

Dear Amanda Moran,

SUBJECT Resource Consent requirement by local council to install a power pole.

Thank you for your reply, but I confess to being surprised at what you had written, as you do not seem to have appreciated from the documents forwarded what I was trying to convey.

→ This was not just about me personally or even one private company having a problem with the local council. This situation where the local council requires a Resource Consent for a private company to install a power pole in a particular spot, but allowing a line company to place it in the same spot as of right has to effect every private constructor in the Country, and in fact restores the monopoly that power boards held prior to the 1984 when monopolies were removed to allow private contractors entry into the industry, essentially to provide competition, under regulation 10 of that act.

It is of note that this area line company is not a utility, it is a limited liability company just the same as the majority of private companies in this field, it does not sell power but is a construction company only, which provides the hardware that conveys electric energy for the real utilities ie the Energy Traders, who of course are the utilities, who market the electric energy to the domestic users since the so called Bradford Reforms of 1998 1999.

I notice from the information that you sent me that the Resource Management Act didn't come into being until 1991,

I also noted your comment re distances from the banks of a water way, which my design certainly complied with, so on that score it complies. And by insisting on this consent this council is effectively denying a competitive construction costing to a customer, and as previously stated negating the ability to have effective competition as per the 1984 act.

This was just a single domestic supply for a hard working rural farmer, this is not seeking permission to place a wind farm in central otago or extend the Auckland wharf, this would cause no problem to



anyone, and in fact the local fire company approved our design, and would take over the construction as part of their network assets and be responsible for future maintenance. It is also of note that the roading section of the district council has approved our plan and given consent to cross under the width of road reserve, but of course we are blocked for lack of permission to go over or under the adjacent creek. When our company first started this type of work the council approved us, and in fact we have been doing this type of construction for just on 20 years.

I consider this senseless bureaucracy will cause private contractors to walk away as I have, and I will also to any similar situation. The right to electricity should be available to every household if they require it, as it is part of modern living, and don't forget that NZ is an agricultural country, farmers work hard and pay taxes that ultimately fund Govt departments such as yours.

As you have noted I have worked in the industry for a long time, and the sad part of all this is that many of our senior and most experienced professionals including myself can't wait to get out, or retire because of this type of ridiculous bureaucracy. I hope that you note this and pass this on to the relevant division of Govt that should be concerned. It was a rewarding industry to be part of, until the paper pushers arrived.

I have included a decision that has just been released and copied from our local paper, it makes interesting reading, and makes a mockery of council planning regulations.

Yours Sincerely,

Jack Reddan .

Electrician, Inspector, Cable Joints, Metering Contractor,

Independent Qualified Person , for Fire Alarms and Emergency Lighting

8 Brydon St Renwick Marlborough.

Ph/fax 03 5728227

reddanblm@vodafone.co.nz

COPY Mr MARK CALDWELL M.D.C.

# 'PATREDIX POWER SERVICES' Ltd M.N.Z.I.E

8 BRYDON ST. RENWICK MARLBOROUGH

Phone: (03) 572 8226 or (03) 572 8227 Fax: (03) 572 8227

Electrical - Jack Reddan: 027 266 7239 Line Construction - Baden Dixon: 027 266 7163

2.12.2011.  
Mr Glenn Wigley  
resource Manager Practice Team.  
23 Kate Shepherd Place.  
Thorndon.  
Wellington.

OFFICE COPY  
ROUGH DRAFT  
ORIGINAL POSTED  
2-12-2011

Dear Sir,

I have been advised to write to you by your phone contact  
Information Desk.

**SUBJECT.** The decision of this local Council The Marlborough  
district Council in declaring a power pole required to be set  
up in a specific area to be a building, yet allowing the local  
line company Marlborough Lines Ltd to place a pole in the same  
spot, and it is called what it is a pole, but advising a private  
company that a resource consent is required to do the same work.

It is of some interest that a concrete bridge has been build in  
this same area without the requirement of a Resource Consent.

To explain. With reference to the above subject. This company  
was approached by a private land owner, requesting a quotation  
for the supply of 230 volt domestic power for a proposed new  
dwelling.

The area being refered to is a sparsely populated rural area  
40 miles south of Blenheim called Ward, and any proposed power  
line would be required to cross the roadway named, Beach Road,  
and the creek adjacent to the roadway called The Flaxbourne  
River.

Private contractors approved by Marlborough lines Network have  
access to the local network provided certain rules and documents  
are followed and filed, and local and national regulations are met

It is of note that the 1984 Electricity Act, regulation 10 removed  
all monopolies enjoyed by the then power boards to allow private  
contractors, if suitably qualified to do this work to bring some  
competition into this area of work. This area of construction is  
called WORKS.

This company designed and presented a draft plan to the area Line  
Company, who approved and authorised it as ok to go ahead,  
provided certain boxes are ticked.

continue page 2.

Domestic - Commercial - Industrial - Aerial & Underground Services - Subdivision -  
Electrical Control - Consultancy - See us for Cable sales, T.P.S. Copper and  
Aluminium, Neutral screens, H.D.P.E. Irrigation cable.  
**WE SPECIALISE IN RURAL POWER SUPPLIES**

page 2.  
Mr Glenn Wigley.

One of these boxes is checking if a permit is required to cross over a navigational water way, and since this local Council has taken over the role the catchment played, a request goes to them so that a note advising of its navigatable status can be advised to the Line Company.

This creek called the Flaxbourne River would be lucky to be able to be navigated by a whitebait, and in fact dries up in the summer this then is the start of our dilemma, and you can see from the copy of the Council letter enclosed that any pole put in place by a private contractor is called a building and requires a resource consent, whereas any pole put in the same spot by a line company is a pole and no resource consent is required.

I confess to being absolutely astounded by this interruption by Council. To me it is the type of ridiculous bureaucracy that seems to be permeating into this country. To me this is now not about one private company but all of them throughout this country.

Personally i have been working with power for over 40 years, and this company which i am part of has been doing power construction work all over marlborough and further afield for nearly 20 years, and of course over that time have crossed many creeks and in fact a river, a real river. This company in fact wrote for the council the specification to cross beneath creeks and small water ways. We did ask the question could we go beneath this particular creek, but the answer was that a resource consent was still the requirement.

I wonder would they put up with this rubbish when they finally start on the rebuilding of Christchurch, i think not.

There is also the anti competitive aspect here, a private company is faced with additional costing prior to even quoting, so they would just be wasting their time as i have. I would like to further point out that this company was the first in the northern part of the South Island to quote against a Power Board as they were known then, ie Marlborough and Nelson. Our scope of work entailed high and low voltage construction both aerial and underground. The supply and fixing of over 200 power transformers, the installations for housing, the grape industry, caravan parks etc, i don't think i need to go on.

I personally took documents into the council and left them there after having had discussion with a council employee, and interestingly they requested i provide paper work, when they already had it. organised? This a month after the original lodging.

I was also requested to write in to the manager of the Resource consent section, which i did, but never received a reply.

continue page 3.

I list some of the contacts with Council and further afield.

Initially i had several contacts by phone with one of the duty planners ,whoes name i found out later was an Alan Anderson,who i have to say contributed nothing,but made the comment many times that he found it very interesting.

I had by this time a copy of the relevant part of Marlborough District Councils Wairau /Awatere Resource Management Plan,which allowed a line to be built in the area in question as a permitted activity by so called Utilities. See copy enclosed for you. Start at 27.5 .Highlighted areas are interesting.

After talking,several members of the council staff,who put me on to some body else each time,until i came across another planer who cut me off quite rudely,with comment a resourse consent is required.

Contact was made with a Mr Ron Beatty of the Electricity Dept. -- who made comment that it was probably a rule that had some how been missed and came through in subsequent regulation changes,and he advised that i talked to the Ministry of Economic Development, which i did,a Mr Miller,who advised i ask the Council the meaning of the word Utility,which i did in a letter to the C.E.O.of the council. The letter from an Anna Eatherley is the result.

I then contacted Mr Ron Beatty again and was advised that he could not help, and advised contacting the Ministry Of Economic Development again,which i did and spoke to a Mr Gareth Wilson who gave me a rapid brush off,and said that the Ministry of the Environment was the place to go,so after a couple of days i got a contact.

The silly part of all this that i have approval from the Line Company,who have accepted our plan given an approval number and signed it off,copy for your perusal,i have permission from the roading division of council to cross over the roadway,they also have a plan,but another section of this council refuses this work until a resource consent is obtained, simply because we are not classed as a utility or electricity distributor.

There is no doubt in my mind that the electricity industry is a shambles,full of rules,some back dated to previous publications conflicting interruptions,referring backwards and forwards, a myriad of them which the workers at the coal face are thoroughly sick off. A classic example is the publication.Australian/N.Z. standard,known as the Australian and New Zealand Wiring Rules AS/NZS 3000/2007. Being sold by Standards N.Z.around the country but not able to be used legally until 3 years later.

Although this is not part of your designated scope it will give an idea of what workers in this industry are faced with daily, so you can see that this whole saga to me is a nonsense especially since the local Line Company wants to take over the completed construction,and be then responsible for any on going maintenance.

The critical practical application for any aerial line is it's clearance above ground or any possible working machinery.

page 4.

Mr Glenn Wigley.

To me this rubbish is the last straw New Zealand needs people who can wield a hammer and construct something, not office wallers who write all this silly rubbish that advances nothing .

I wonder if i was granted a resource consent do you think the council would approve me putting dormer windows and perhaps a log burner on the pole since they class it as a building.?

Finally i would like to point out there are no complete power utilities any more. The so called Bradford Reforms compelled all Power Boards to divide and sell off half of their business, most of course sold off their customer base and kept their lines as has happened in my area. So since the reforms of 1998/1999 the previous companies that sold power are now really only construction companies and to my mind the real utilities are the ones that sell power ie. the energy traders.

Lets have a look at the electricity act 1992 part 2. clauses 3 and 4. which states that where a business has ceased to carry out the duties of an electricity distributor their licence to be carried such is revoked. Clause 4. So carrying on from that the council understanding is incorrect as it applies to a utility, so that would mean that a line company would also require a resource consent and be treated the same as all the other private companies that do this work around this country.

The waste of time for us and other companies that are used doing this work is wasted by this type of ridiculous bureaucracy.

There are many government departments in this country that run on tax payers, they contain for the most part remote and faceless people, who don't want to know and pass you off to somewhere else.

It is very difficult for people or small companies to even know where to go, to complain against the monolith, or try to oppose it.

Thank you for your attention.

If you require more information or perhaps documents please contact me. 027.2667.239.

I an

Yours Sincerely.

Jack Reddan

Marlborough Lines Approval to proceed with work, as long as we conform to paragraph 2) Navigable waterway



Network Approval No 090107

### Network Approval Sheet Notification of Proposed Work

Contractor Details:

PATREDIX POWER SERVICES LTD Application Date: 5.7.2011  
8, BRYDON ST. RENWICK 5728227 027 2667 239

1) Customer Details:

Customer Name: Coly Mark Caldwell  
Job Address: MARLBOROUGH

2) Description:

TO CONSTRUCT 3 SPAN HIGH VOLTAGE AERIAL LINE FOR PROPOSED NEW DOMESTIC DWELLING (240V SUPPLY). PLEASE REFER TO PLAN FOR REQUIRED DETAILS. PLUS PLEASE ADVISE ALL NETWORK COSTS AND ADDITIONAL REQUIREMENTS THAT MAY APPLY HERE.

3) Job Details: (Contractor to complete)

Transformer Required	<input checked="" type="radio"/> Yes <input type="radio"/> No	Cable phase	<u>15</u>	KVA		Type: Mini sub	Cable entry	<input checked="" type="radio"/> Pole
Existing transformer	Site No:					phase	KVA	
Load details	<u>DOMESTIC 40 AMP</u>	Motor details	<u>N/A</u>			Starting method	<u>N/A</u>	
Subdivision plan	Yes <input type="radio"/> No <input checked="" type="radio"/>	Vesting agreement	Yes <input checked="" type="radio"/> No <input type="radio"/>			Men. Roads approval	Yes <input checked="" type="radio"/> No <input type="radio"/>	
Resource consent	Yes <input type="radio"/> No <input checked="" type="radio"/>	Tree Hazards	Yes <input type="radio"/> No <input checked="" type="radio"/>			Transit highway permit req	Yes <input type="radio"/> No <input checked="" type="radio"/>	
Easement required	Yes <input checked="" type="radio"/> No <input type="radio"/>	Shutdown required	HV? <input type="radio"/> LV <input type="radio"/>			New/Waterway permit req	Yes <input type="radio"/> No <input checked="" type="radio"/>	
Non injurious letter	Yes <input type="radio"/> No <input checked="" type="radio"/>	Telecom approval	Yes <input type="radio"/> No <input checked="" type="radio"/>			DOC approval	Yes <input type="radio"/> No <input checked="" type="radio"/>	

4) Marlborough Lines Approvals and Restrictions

Audit required  Yes  No During installation  Pre living  Post living

Development charge  Yes  No KVA 15 Distance from zone sub 2.6 Km Amount \$ 462 + GST

Pay Back Yes  No  Amount \$ \_\_\_\_\_ + GST

Capital Contribution Yes  No  Amount \$ \_\_\_\_\_ + GST

10 Year Warranty Yes  No

Network owned equipment to be returned to ALL Stores Yes No

Conditions ① Easement in gross required over the HV line, transformer and associated earthing. Transfer document to be fully signed and lodged at LINZ prior to accessing the network.  
 ② You will need to get approval to cross Foxbourne River. This is most likely controlled by DOC, MAC or LINZ. (or a combination of these authorities)  
 ③ Construction voltage to be 22kV.  
 ④ Transformer bird protection is required in this area.

Shutdown: Cell phone switching to live line top by Electro services and transfer inspection fee is \$550 + GST.  
 Approved: Signed: [Signature] Name: Ian Aston Date: 26-7-11

Marlborough Roads Approval to cross road with Power lines

**Marlborough Roads**

CROSSING BY 2 WIRE AERIAL LINE  
**ROAD OPENING NOTICE**  
(to be lodged at least 10 days before opening road)



Date: 18.10.2011

From JACK REDDAN  
Organisation: PATREDIX POWER SERVICES LTD  
Address OFFICE 8 BRYDON ST.  
RENWICK

Phone: 5728227. 027-2667-239  
Fax: 5728227 reddanblmevodafone.co.nz

I wish to carry out the work described in the plans and specifications deposited herewith and/or as described below:  
Contact Person: JACK REDDAN After Hours Ph. No. 5728227 0272667239

Work Considered to be: Major  Minor  Emergency

- Major work:
- \* Any crossing of carriageway by open trench
  - \* Any hole in carriageway greater than 1 square metre
  - \* Any trench along berm, footpath or carriageway
  - \* Any work deemed major by Marlborough Manager.

- Minor Work:
- \* Any work covering less than 1 square metre where minimal traffic disruption
  - \* Services to domestic dwelling where trench runs across berm or across footpath.

Description of Work: 116 WARD BEACH ROAD, POWER FOR PROPOSED NEW DWELLING LOT 1 DP 413192. 2 AERIAL WIRES TO BE JOINED TO EXISTING POWER.

Address: POLE IN ROADSIDE BERM IN WARD BEACH RD. PILE NO UG 0733

Locate in Road: Berm  Carriageway  Footpath

Estimated start date: TO BE ADVISED Duration: 2 HRS

Note: Actual start date to be notified to: Marlborough Roads, PO Box 1031, Pienheim  
Telephone: (03) 577-1850 Fax: (03) 577-5309

I agree to undertake the works in accordance with the Marlborough Roads' Specification for the Excavation and Reinstatement of Trenches, Marlborough Roads 'Conditions for Use of the Road' by Network Operators (where applicable), and any other reasonable conditions as required by the Marlborough Manager and detailed below

I agree to maintain the trench for a period of 12 months. I will undertake any maintenance on the trench as required by Marlborough Roads or Marlborough Roads Physical Works Contractor. N/A

Signature of Applicant: J. Reddan Date 18-10-2011

**OFFICE USE:**

Conditions of Approval:

1 \_\_\_\_\_

2 \_\_\_\_\_

for Marlborough Manager: \_\_\_\_\_ Name: \_\_\_\_\_  
 \_\_\_\_\_ L. signature: \_\_\_\_\_  
 \_\_\_\_\_ Date: \_\_\_\_\_

*Administrator*  
19/10/11

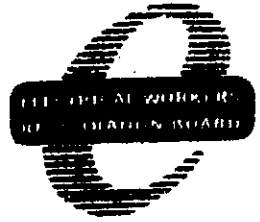
This notification refers to ALL excavation works within the legal road reserve.

DD 1208335

Electrical Workers  
Registration Board  
"Copy re Work Limits"

Ref#Ew023413

8 July 2010



**Safety • Competency**

26 Customhouse Quay Wellington

PO Box 10-156, Wellington 6143

Telephone 04 472 3636

Facsimile 04 473 2396

Website [www.ewrb.govt.nz](http://www.ewrb.govt.nz)

Freephone 0800 86 1000

Mr J F Reddan  
8 Brydon Street  
Renwick  
7204

Dear Mr Reddan

Thank you for your correspondence relating to registration work limits,  
received 11 May 2010.

The Board has noted your comments.

Your Inspector registration/practicing licence carries no work limits.

Please advise if I can assist you further

Yours faithfully

Paul McGrail  
Client Services Officer