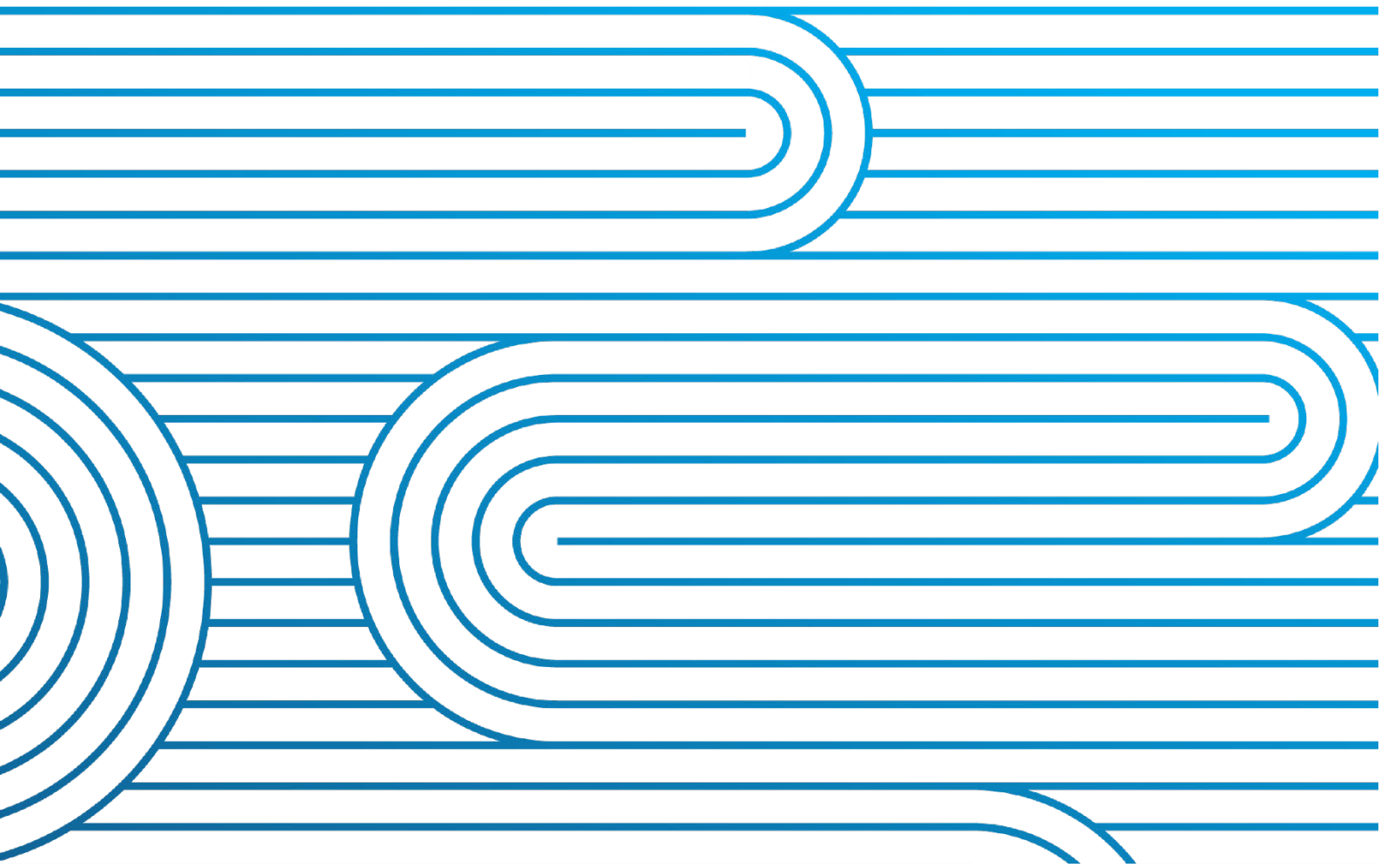


Submission by Transpower New Zealand Limited on the Proposed Lower Hutt District Plan

2 May 2025





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Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Hutt City Council ("the Council")

Name of submitter: Transpower New Zealand Limited ("Transpower")

This is a submission on the Proposed Lower Hutt District Plan

Transpower could not gain an advantage in trade competition through this submission.

The specific provisions of the Proposed Plan Change that my submission relates to are:

The Proposed Lower Hutt District Plan in its entirety.

Transpower's submission is:

Attached is background information, including an overview of Transpower.

A map of existing National Grid assets in Hutt City is included in Appendix A.

A copy of the National Policy Statement on Electricity Transmission 2008 is attached as Appendix B.

Transpower's specific submission points are included in Appendix C.

Transpower seeks the following decision from the local authority:

Retain or amend the provisions of the Proposed Lower Hutt District Plan to give effect to the NPSET as set out in **Appendix C** including such further alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Transpower wishes to be heard in support of its submission.

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.

**Signature of person authorised to sign
on behalf of Transpower New Zealand Limited**

Date: 2 May 2025

Electronic address for service: environment.policy@transpower.co.nz

Telephone: [REDACTED]

Postal address: PO Box 17 215 Greenlane, Auckland 1546

Contact person: Rebecca Eng

Submission by Transpower New Zealand Limited on the Proposed Lower Hutt District Plan

1. Overview

The following submission is provided to inform the review of the City of Lower Hutt District Plan and to ensure that its corresponding planning framework appropriately recognises and provides for the National Grid. The District Plan review provides an opportune time to update the provisions and ensure the District Plan gives effect to the NPSET.

From Transpower's perspective, the provisions of the Proposed Lower Hutt District Plan ("PDP") need to ensure:

- That the National Policy Statement on Electricity Transmission 2008 ("NPSET" or "NPS") is given effect to;
- The sustainable management of the National Grid as a physical resource of national significance is recognised;
- The benefits of the National Grid at local, regional and national levels are recognised and provided for;
- The need for the ongoing operation and maintenance of the network is recognised; and
- The protection of the National Grid from reverse sensitivity and the adverse effects of others' activities (including sensitive activities) is recognised to ensure the National Grid is not compromised.

To inform the district plan review, the following outlines:

1. Background information on Transpower and the Statutory Framework within which it operates, including existing National Grid assets within Lower Hutt City
2. An overview of the framework Transpower typically supports and seeks in relation to the National Grid
3. Specific amendments Transpower would support in the PDP.

Potential National Direction Changes

In providing this submission to the PDP, Transpower is cognisant of potential changes to national direction, specifically the NPSET and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA"). On that basis Transpower notes its position may well change through the plan change process. Transpower is committed to constructively working with council to give effect to any changes that may arise.

2. Introduction to Transpower and Statutory Framework

Transpower is a State-Owned Enterprise that plans, builds, maintains owns and operates New Zealand’s National Grid, the high voltage transmission network for the country. It carries electricity throughout the country by connecting power stations owned by generating companies to substations feeding local networks that distribute electricity to homes and businesses. Some businesses that are intensive electricity users connect directly to the National Grid, such as Tiwai Aluminium Smelter and Glenbrook Steel Refinery. The role of Transpower is shown in Figure 1 below, in relation to “Transmission” and “substations”.

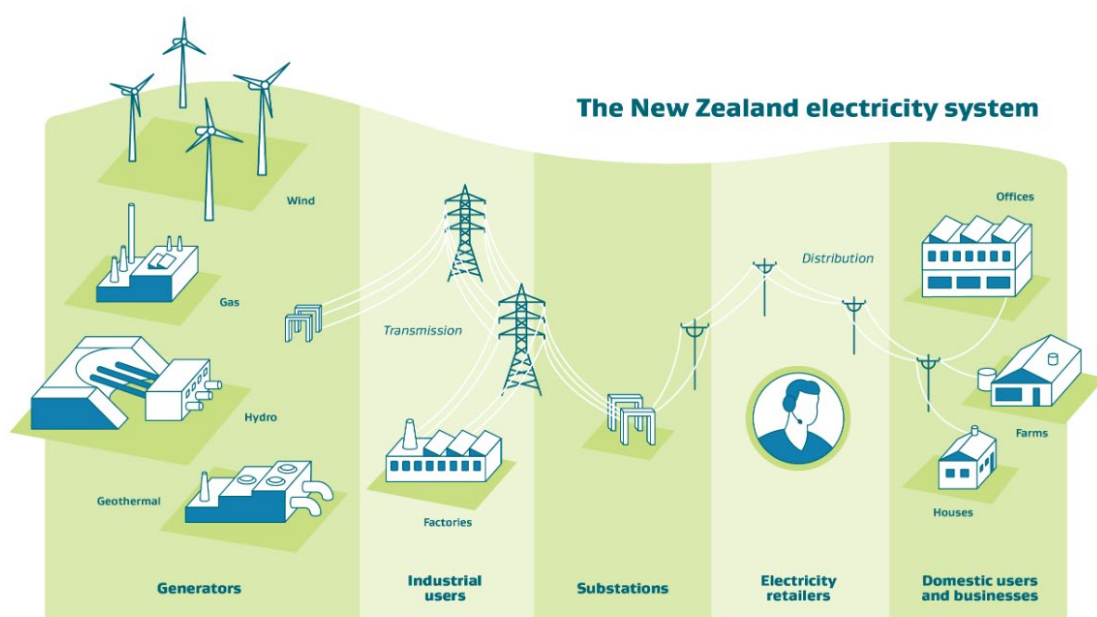


Figure 1 Role of Transpower in New Zealand’s electricity industry. (Source: MBIE)

The National Grid comprises towers, poles, lines, cables, substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000 km of transmission lines and over 170 substations, supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower’s role and function is determined by the State-Owned Enterprises Act 1986, the company’s Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

Transpower’s Statement of Corporate Intent for July 2024 to June 2027, states that:

Transpower is central to the New Zealand electricity industry. We connect generators to distribution companies and large users over long distances, providing open access and

helping to balance supply and demand. The nature and scope of the activities we undertake are:

- as grid owner, we own, build, maintain, replace, and enhance the physical infrastructure that connects those who generate and those who need electricity to live, work and play across the country, and
- as system operator, we operate the electricity market, through a service provided under contract to the Electricity Authority under the Electricity Industry Participation Code, managing supply and demand for electricity in real time to ensure that the power system remains stable and secure.

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It has to be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs.

In 2020, Transpower published a document "Whakamana i te Mauri Hiko – Empowering our Energy Future. It sets out what the energy future in New Zealand may look like between now and the year 2050. This work, as well as other future energy sector analysis¹, reflects a broad consensus on the key contribution of electricity to Aotearoa New Zealand's future energy system that is consistent with a net zero carbon future. It shows that the greatest opportunities for emissions reductions outside of agriculture exist in the energy sector, specifically, around increasing the proportion of renewable electricity in the system and the electrification of transport and process heat. Transpower's base case scenario expects that electricity demand will increase 68% by 2050. To meet this increase in demand will require significant investment in New Zealand's electricity generation, transmission and distribution infrastructure. Simply put, New Zealand's electricity transmission system is the infrastructure on which our zero-carbon future will be built. This work supports Transpower's view that there will be an enduring role for the National Grid in the future, and the need to build new National Grid lines and substations to connect new, renewable generation sources to the electricity network.

Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient District Plan where it may affect the National Grid, including possible future changes. It should also be noted that Transpower cannot foresee all future development of the National Grid, particularly as it has an obligation to connect new electricity generation developments to the National Grid, and they can be located almost anywhere.

2.1 Lower Hutt City Area Assets

Transpower has a significant number of overhead transmission line, substation and telecommunications assets within Lower Hutt City, comprising the following:

- Bunnythorpe – Haywards A 220kV line (BPE-HAY A)
- Bunnythorpe – Haywards B 220kV line (BPE-HAY B)
- Haywards – Melling A 110kV line (HAY-MLG A)

¹ Boston Consulting Group (BCG) 'Future is Electric' report, Climate Change Commission (CCC) modelling (2021-2024) and MBIE Electricity Demand and Generation Scenarios (EDGS).

- Haywards – Melling B 110kV line (HAY-MLG B)
- Haywards – Takapu Road A 110kV line (HAY-TKR A)
- Haywards – Upper Hutt A 110kV line (HAY-UHT A)
- Oteranga Bay - Haywards A 350kV line (OTB-HAY A)
- Gracefields – Haywards A 110kV line (GFD-HAY A)
- Haywards – Judgeford 220kV line (HAY-JFD A)
- Haywards Substation (both AC and DC switchyards)
- Melling Substation
- Gracefield Substation

All lines within Hutt City are on towers. There are no existing pole support structures.

Refer to Appendix A for a map showing the location of these assets.

2.2 Statutory Framework

National Policy Statement on Electricity Transmission

The National Policy Statement on Electricity Transmission was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act (“RMA”) duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid. The NPSET only applies to the National Grid – the assets used or owned by Transpower – and not to electricity generation or distribution networks. A copy of the NPSET is attached as Appendix B.

The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, councils have to work through how to make appropriate provision for the National Grid in their District Plans, in order to give effect to the NPSET.

The one objective of the NPSET is as follows:

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

The NPSET’s 14 policies provide for the recognition of the benefits of the National Grid, as well as the environmental effects of transmission and the management of adverse effects on the National Grid. The policies have to be applied by both Transpower and decision-makers under the RMA, as relevant. The development of the National Grid is explicitly recognised in the NPSET.

Policy 1 of the NPSET provides that decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. Explicit

reference is made to the benefits of security of supply, efficient transfer of energy, development and use of new electricity generation, and enhanced supply.

Policies 2 to 9 provide RMA decision-makers direction for managing the environmental effects of transmission activities.

Recognition of the development of the National Grid is also required in Policy 2 of the NPSET, in that “decision makers must recognise and provide for ... the development of the electricity transmission network”. Policy 2 is as follows:

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

Policies 3 to 5 contain matters to which decision-makers must consider or have regard, including:

- the constraints imposed on avoiding, remedying or mitigating adverse effects by the technical and operational requirements of the network
- the role of the route, site and method selection process in avoiding, remedying or mitigating adverse effects for new or major upgrades of transmission infrastructure, and
- the enablement of the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.
- Policies 6 to 8 relate to Transpower’s responsibilities under the NPSET, with Policy 6 promoting the reduction of existing adverse effects where substantial upgrades of transmission line infrastructure are undertaken. Policies 7 and 8 relate to circumstances in which the effects of transmission infrastructure could be reduced, minimised or avoided in urban and rural environments. Policy 9 specifically relates to standards for dealing with electric and magnetic fields.

Policy 8 of the NPSET directs that within rural environments, planning and development of the National Grid should seek to avoid adverse effects on certain environments/areas (being outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity, and existing sensitive activities). The wording of NPSET policy 8 (“should seek to avoid”) does not impose an absolute requirement for the National Grid to avoid all adverse effects. Rather, the NPSET recognises total avoidance is not always possible given the technical and operational requirements of the National Grid (as recognised in Policy 3 of the NPSET).

Policy 8 is as follows:

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network. These policies are critical matters for a District (City) Plan to address. The policies seek to manage activities to ensure the operation, maintenance, upgrading and development of the National Grid is not compromised, avoid sensitive activities locating in close proximity to electricity transmission lines and infrastructure, and manage other activities to avoid reverse sensitivity effects on the network. Policy 10 is as follows:

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network

and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

Policy 11 relates to the development of buffer corridors, and is as follows:

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

Policy 12 requires the identification of the transmission network on territorial authority planning maps.

Policies 13 and 14 relate to the long-term strategic planning for transmission assets.

Section 75(3)(a) of the RMA requires that District (City) Plans must 'give effect' to a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.

It is therefore a requirement that local policy reflects national direction and that the local policy is effective in helping support the integrated management of natural and physical resources within the city, as well as across the region as a whole.

Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

The NESETA came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010: it does not apply to substations or electricity distribution lines, and nor does it apply to the construction of new transmission lines (which are typically designated).

Activities covered by the NESETA are activities relating to the operation, maintenance, upgrading, relocation or removal of an existing transmission line, including:

- a construction activity
- use of land or occupation of the coastal marine area
- activities relating to an access track to an existing transmission line
- undergrounding an existing transmission line.

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The NESETA regulates how Transpower's existing lines in Hutt City are developed and maintained, rather than the District Plan Rules. In accordance with Section 43B of the RMA, the district plan rules cannot be more lenient or stringent than the NESETA rules and therefore the NESETA rules in effect prevail.

2.3 Greater Wellington Regional Policy Statement

The National Grid is included in the definition of regionally significant infrastructure under both the RPS and the NRP.

Relevant objectives and policies in the RPS include:

- Objective 10, which provides that the social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised and protected;
- Policy 7, which requires that regional plans include policies and/or methods that recognise the benefits of regionally significant infrastructure;
- Policy 8, which requires that regional plans include policies and/or methods that protect regionally significant infrastructure from incompatible use and development;
- Policy 39, which requires that changes to the regional plan have particular regard to the matters set out in policy 7 and policy 8.

Transpower is cognisant of Proposed Change 1 to the RPS. Changes to Policies 8 and 39 have come through the decisions version, as follows:

Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – district and regional plans

District and regional plans shall include objectives, policies, rules and/or other methods that:

(a) recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure, including:

(i) people and goods can travel to, from and around the Wellington Region efficiently and safely and in ways that support the transition to low or zero-carbon multi-modal transport modes;

(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;

(iii) people have access to energy, and preferably renewable energy, so as to meet their needs; and

(iv) people have access to telecommunication services; and

(b) recognise and provide for the social, economic, cultural and environmental benefits of energy generated from renewable energy resources and its transmission through an efficient, effective and resilient electricity transmission network, including:

(i) avoiding, reducing and displacing greenhouse gas emissions;

(ii) contributing to the security of supply, resilience, independence and diversification of our energy sources and the transmission of this energy to communities, homes and businesses;

(iii) reducing dependency on imported energy resources;

(iv) using renewable resources rather than finite resources;

(v) the reversibility of the adverse effects on the environment of some renewable electricity generation technologies;

(vi) the provision of an efficient, effective and resilient electricity transmission network; and

(vii) providing for the economic, social and cultural well-being of people and communities; and

(c) recognise the benefits of regionally significant infrastructure that contribute to reductions in greenhouse gas emissions, give effect to Te Mana o te Wai, mitigate natural hazards, or enable people and communities to be resilient to climate change.

Explanation

Policy 7 recognises that renewable energy generation and regionally significant infrastructure can provide a range of local, regional and national benefits, including helping to reduce greenhouse gas emissions, and provide essential services for the well-being of people and communities. The Policy also recognises the benefits of regionally significant infrastructure that supports lower greenhouse gas emissions, the health and wellbeing of freshwater and receiving environments, climate change resilience and natural hazard mitigation, and must be read with other policies that restrict the location of infrastructure in certain places, such as Policy 52.

Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration

When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan:

(a) recognise and provide for the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and its transmission through the electricity transmission network; and

(b) recognise the social, economic, cultural, and environmental benefits of other regionally significant infrastructure, including where it contributes to reducing greenhouse gas emissions and provides for climate change mitigation, climate change adaptation and climate-resilience; and

(c) have particular regard to protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and

(d) recognise and provide for the operational need and functional the need for renewable electricity generation activities to be in particular locations, including the need to locate where the renewable energy resources exist; and

(e) recognise the benefits of utilising the significant wind, solar and marine renewable energy resources within the Wellington Region and the development of the electricity transmission network to connect the renewable energy resource to distribution networks and end-users.

Explanation Policy 39 recognises that renewable energy generation and regionally significant infrastructure can provide a range of environmental, economic, social and cultural benefits locally, regionally and nationally, including where it contributes to reducing greenhouse gas emissions as sought by Objective CC.3. These benefits are outlined in Policy 7.

3. Transpower's Submission on the Proposed Lower Hutt District Plan

A key issue for Transpower is how the District Plan review intends to give effect to the NPSET.

The package of National Grid provisions Transpower supports within the PDP include:

- Objective, policies and rules to recognise existing National Grid assets as well as specific provisions to recognise and provide for the development of new National Grid assets. The primary policy approach is for a 'seek to avoid' policy directive for new assets within sensitive/valued environments, and an enabling/recognise policy to recognise existing assets and new assets outside sensitive environments.
- Clear policy directive to reconcile any policy tensions within the District Plan.
- Inclusion of specific provisions to manage use and development within a spatially defined area adjacent to existing transmission lines. These include policies and rules to manage subdivision and use and development (including earthworks).

These matters are addressed in greater detail in the specific submission points and in the table below which provides specifics on the provisions Transpower would support.

Appendix C contains Transpower's detailed submission on the PDP. The following sections summarise the key issues raised by Transpower in its detailed submission and for the avoidance of doubt, form part of the submission.

- **Definitions:** The definitions are largely supported with discrete changes sought, mainly to the definitions of the National Grid assets in the city, and replacement of the definition of reverse sensitivity with that in the RPS.
- **Strategic Direction:** Inclusion of specific National Grid provisions into the strategic direction chapter.
- **Infrastructure Chapter:** General support for the chapter but in order to provide clarity to plan users, Transpower seeks amendment to the wording to clarify the Infrastructure Chapter is largely stand alone, with those exemptions clearly identified. The most significant policy changes are to the National Grid specific policy INF-P8. Should the sought changes not be granted, wide policy changes will be required across other policies to give effect to the NPSET. The primary changes sought to the Infrastructure Chapter rules are to amend the activity status within INF-R18 and R19 from non-complying to discretionary, and deletion of INF-R17.
- **Protection of Infrastructure Chapter:** The chapter is largely supported with confined amendments sought.
- **Earthworks Chapter:** The Earthworks Chapter is largely supported. Changes are sought to the National Grid Yard earthworks rule to capture 'Minor earthworks' and amend the default activity status from restricted discretionary to non complying.
- **Subdivision Chapter:** The Subdivision Chapter is largely supported with minimal changes sought.

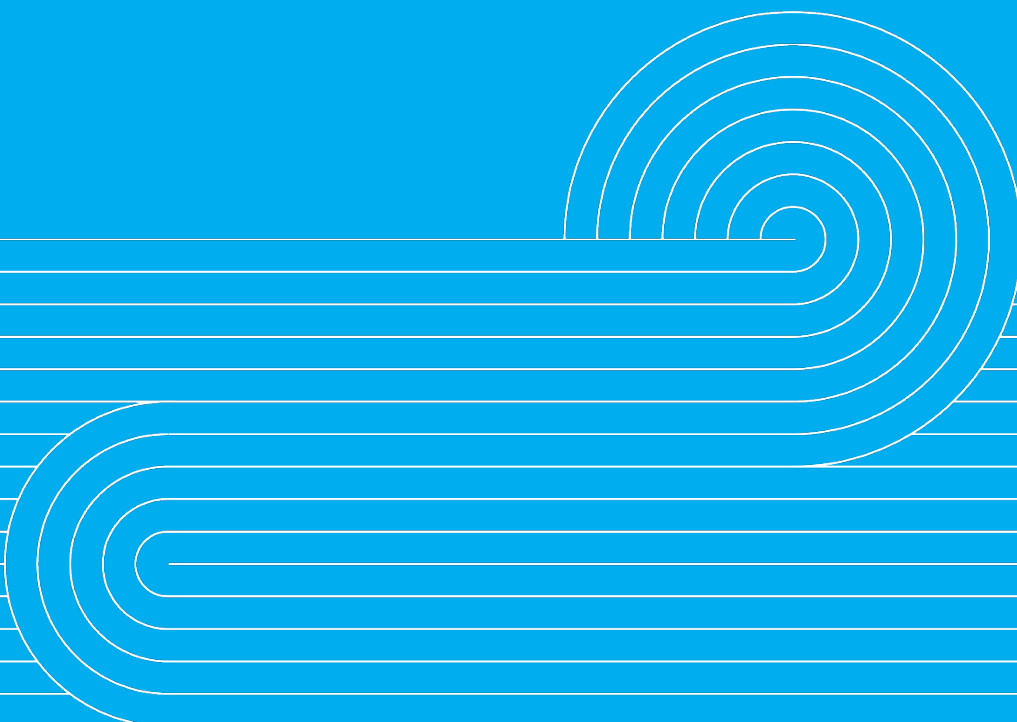
- **Coastal Environment and Natural Environment Values:** As part of its submission Transpower seeks substantive changes to the National Grid policy INF-P8 to give effect to the NPSET.
- **Ecosystems and Indigenous Biodiversity:** Acknowledging the PDP does not identify SNA's, Transpower largely supports the approach within the PDP subject to recognition of vegetation works associated with the upgrade of National Grid assets. Amendment is sought to the effects management hierarchy policy ECO-P4 to exempt the offsetting, compensation and default avoid 'steps' from applying to the National Grid.
- **Historic Heritage and Sites of Significance to Māori:** While largely supported, on the basis the values are addressed in the Infrastructure Chapter, to assist with plan clarity, Transpower seeks the Infrastructure Chapter be relied on.
- **Financial Contributions Chapter:** Transpower raises concerns with how offsetting and financial contributions would be required within the chapter framework.

3.1 Specific Comments

In addition to the general commentary above (which for the avoidance of doubt, forms part of the Transpower submission in that it outlines additional reasoning for the specific relief sought in the following table attached as Appendix C), the following provides specific submissions points.

Amendments sought through this submission are shown as ~~red strikethrough~~ and underline text. For the avoidance of doubt all the points below include any consequential amendments.

Appendix A National Grid Assets within Hutt City



Transpower Assets

Lower Hutt

Legend

Territorial Land Authority

Boundary

NZ Roads

Highways

Transpower Assets

— Cable Protection Zone
— Overhead Fibre Cable
--- Underground Fibre Cables

Site

ACSTN

COMMS

HVDC

TEE

Transmission Line

— 0kV Overhead

— 11, 66kV Underground

— 11, 33, 66 kV Overhead

— 110kV Underground

— 110 kV Overhead

— 220kV Underground

— 220 kV Overhead

— 350 kV Overhead

— 350kV Submarine

— 400kV Overhead



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TRANSPOWER
Prepared by Transpower Geospatial

Projection: NZTM 2000 Scale: 1:133,000 Plan Size: A3L

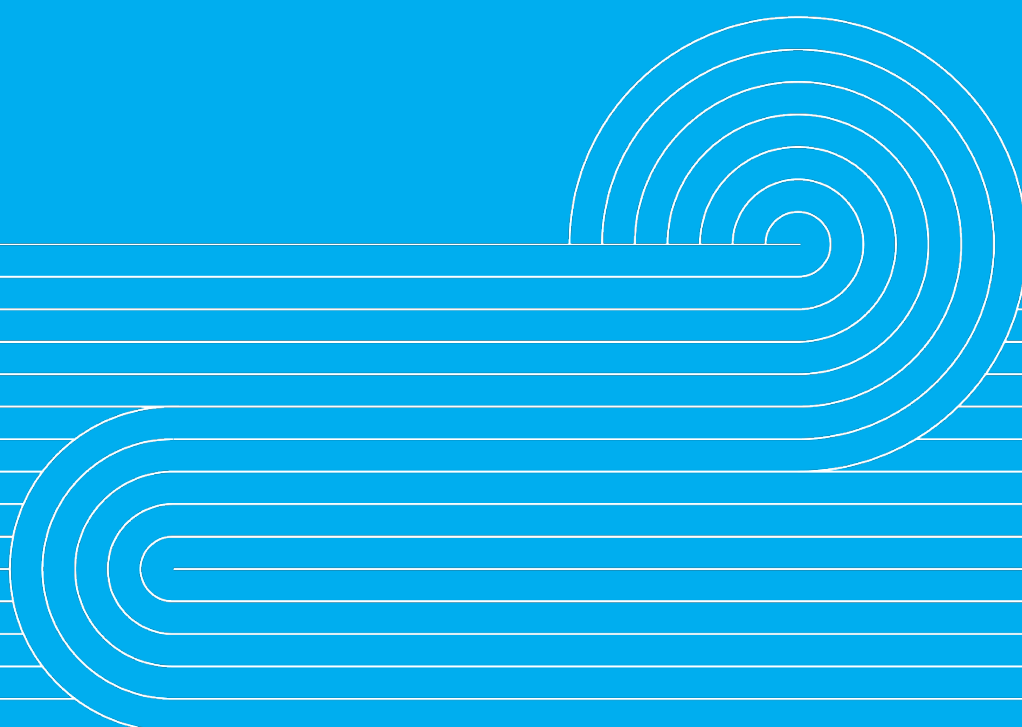
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Appendix B National Policy Statement on Electricity Transmission 2008



NATIONAL POLICY STATEMENT

on Electricity Transmission

Issued by notice in the Gazette on 13 March 2008

CONTENTS

Preamble

1. Title
2. Commencement
3. Interpretation
4. Matter of national significance
5. Objective
6. Recognition of the national benefits of transmission
7. Managing the environment effects of transmission
8. Managing the adverse effects of third parties on the transmission network
9. Maps
10. Long-term strategic planning for transmission assets

Preamble

This national policy statement sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.

In accordance with section 55(2A)(a) of the Act, and within four years of approval of this national policy statement, local authorities are to notify and process under the First Schedule to the Act a plan change or review to give effect as appropriate to the provisions of this national policy statement.

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act. These include:

- Transporting electricity efficiently over long distances requires support structures (towers or poles), conductors, wires and cables, and sub-stations and switching stations.
- These facilities can create environmental effects of a local, regional and national scale. Some of these effects can be significant.
- The transmission network is an extensive and linear system which makes it important that there are consistent policy and regulatory approaches by local authorities.
- Technical, operational and security requirements associated with the transmission network can limit the extent to which it is feasible to avoid or mitigate all adverse environmental effects.
- The operation, maintenance and future development of the transmission network can be significantly constrained by the adverse environmental impact of third party activities and development.
- The adverse environmental effects of the transmission network are often local – while the benefits may be in a different locality and/or extend beyond the local to the regional and national – making it important that those exercising powers and functions under the Act balance local, regional and national environmental effects (positive and negative).
- Ongoing investment in the transmission network and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

The national policy statement is to be applied by decision-makers under the Act. The objective and policies are intended to guide decision-makers in drafting plan rules, in making decisions on the notification of the resource consents and in the determination of resource consent applications, and in considering notices of requirement for designations for transmission activities.

However, the national policy statement is not meant to be a substitute for, or prevail over, the Act's statutory purpose or the statutory tests already in existence. Further, the national policy statement is subject to Part 2 of the Act.

For decision-makers under the Act, the national policy statement is intended to be a relevant consideration to be weighed along with other considerations in achieving the sustainable management purpose of the Act.

This preamble may assist the interpretation of the national policy statement, where this is needed to resolve uncertainty.

1. Title

This national policy statement is the National Policy Statement on Electricity Transmission 2008.

2. Commencement

This national policy statement comes into force on the 28th day after the date on which it is notified in the *Gazette*.

3. Interpretation

In this national policy statement, unless the context otherwise requires:

Act means the Resource Management Act 1991.

Decision-makers means all persons exercising functions and powers under the Act.

Electricity transmission network, electricity transmission and transmission activities/assets/infrastructure/resources/system all mean part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.

National environmental standard means a standard prescribed by regulations made under the Act.

National grid means the assets used or owned by Transpower NZ Limited.

Sensitive activities includes schools, residential buildings and hospitals.

4. Matter of national significance

The matter of national significance to which this national policy statement applies is the need to operate, maintain, develop and upgrade the electricity transmission network.

5. Objective

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- managing the adverse environmental effects of the network; and
- managing the adverse effects of other activities on the network.

6. Recognition of the national benefits of transmission

POLICY 1

In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:

- i) maintained or improved security of supply of electricity; or
- ii) efficient transfer of energy through a reduction of transmission losses; or
- iii) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or
- iv) enhanced supply of electricity through the removal of points of congestion.

The above list of benefits is not intended to be exhaustive and a particular policy, plan, project or development may have or recognise other benefits.

7. Managing the environmental effects of transmission

POLICY 2

In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

POLICY 3

When considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.

POLICY 4

When considering the environmental effects of new transmission infrastructure or major upgrades of existing transmission infrastructure, decision-makers must have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.

POLICY 5

When considering the environmental effects of transmission activities associated with transmission assets, decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets.

POLICY 6

Substantial upgrades of transmission infrastructure should be used as an opportunity to reduce existing adverse effects of transmission including such effects on sensitive activities where appropriate.

POLICY 7

Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.

POLICY 8

In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

POLICY 9

Provisions dealing with electric and magnetic fields associated with the electricity transmission network must be based on the International Commission on Non-ionising Radiation Protection *Guidelines for limiting exposure to time varying electric magnetic fields (up to 300 GHz)* (Health Physics, 1998, 74(4): 494-522) and recommendations from the World Health Organisation monograph *Environment Health Criteria* (No 238, June 2007) or revisions thereof and any applicable New Zealand standards or national environmental standards.

8. Managing the adverse effects of third parties on the transmission network

POLICY 10

In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

POLICY 11

Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

9. Maps

POLICY 12

Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated.

10. Long-term strategic planning for transmission assets

POLICY 13

Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

POLICY 14

Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

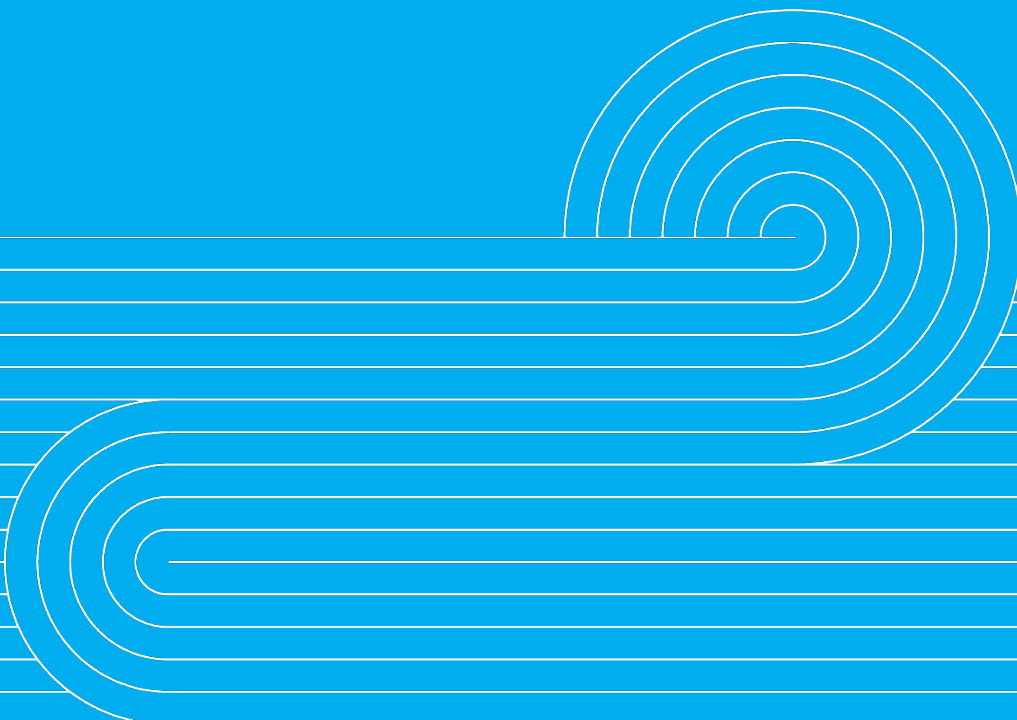
Explanatory note

This note is not part of the national policy statement but is intended to indicate its general effect

This national policy statement comes into force 28 days after the date of its notification in the *Gazette*. It provides that electricity transmission is a matter of national significance under the Resource Management Act 1991 and prescribes an objective and policies to guide the making of resource management decisions.

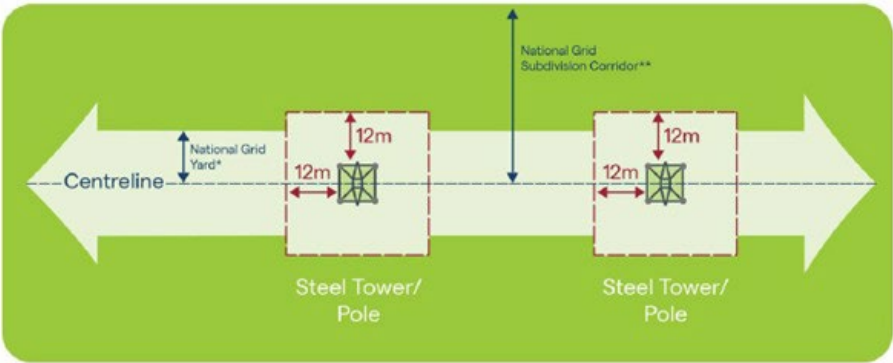
The national policy statement requires local authorities to give effect to its provisions in plans made under the Resource Management Act 1991 by initiating a plan change or review within four years of its approval.

Appendix C Specific Submission Points



Specific plan provision that submission relates to	Support/ Oppose/ Amend	Reasoning	Relief Sought
General Submission Point	Amend	<p>Through its specific submission points, Transpower has sought relief to give effect to the NPSET. The National Policy Statement on Electricity Transmission was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the Resource Management Act ("RMA") duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid.</p> <p>The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, councils have to work through how to make appropriate provision for the National Grid in their District Plans, in order to give effect to the NPSET.</p> <p>Section 75(3)(a) of the RMA requires that District (City) Plans must 'give effect' to a National Policy Statement. Case law has established that the words "give effect to" means to implement, which is a strong directive, creating a firm obligation on the part of those subject to it.</p>	Amend the PDP as appropriate to give effect to the NPSET.
Part 1 – Introduction and General Provisions			
Interpretation			
Definitions			
<i>Insert plan provision</i>	<i>Choose an item.</i>	<i>Provide reasoning</i>	<i>Relief sought</i>
Activity sensitive to the national grid <i>Means a:</i> <ol style="list-style-type: none"> 1. residential activity, or 2. retirement village, or 3. supported residential care facility, or 4. marae, or 5. healthcare activity, or 6. education activity, or 7. community facility, or 8. commercial activity, or 9. custodial corrections facility, or 10. visitor accommodation, or 11. place of assembly. 	Amend	<p>Transpower supports the provision of a definition specific to the National Grid in that it provides clarity for plan users and gives effect to the NPSET. A minor amendment is sought to include papakāinga in the definition to clarify the National Grid Yard and Subdivision Corridor provisions apply to these activities.</p>	<p>Amend the definition as follows:</p> <p><i>Activity sensitive to the national grid</i> <i>Means a:</i> <ol style="list-style-type: none"> 1. residential activity, or 2. retirement village, or 3. supported residential care facility, or 4. marae/<u>papakāinga</u>, or 5. healthcare activity, or 6. education activity, or 7. community facility, or 8. commercial activity, or 9. custodial corrections facility, or </p>

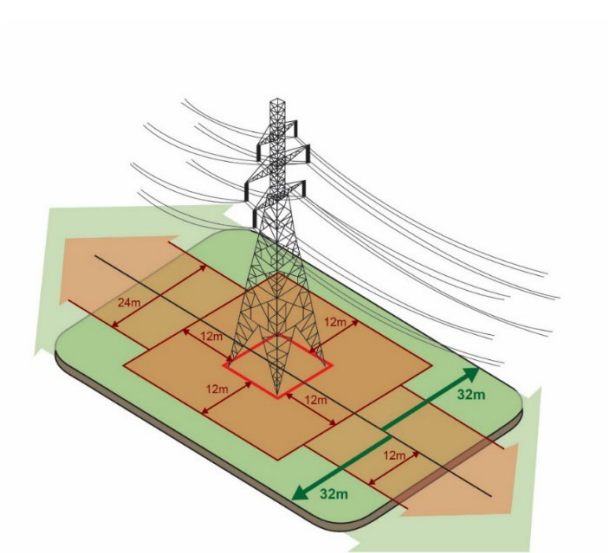
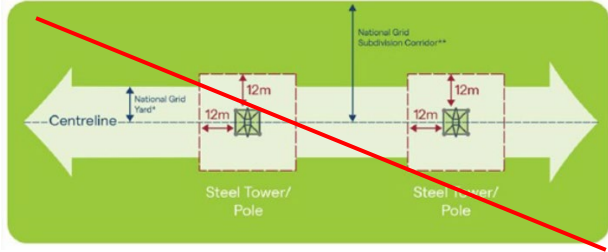
			10. visitor accommodation, or 11. place of assembly.
Earthworks <i>means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock), but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.</i>	Support	Support definition as it is consistent with the National Planning Standards.	Retain the definition as notified
Infrastructure <i>has the same meaning as in section 2 of the RMA (as set out below)</i> <p>a.</p> <p>d. facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person—</p> <p>i. uses them in connection with the generation of electricity for the person's use; and</p> <p>ii. does not use them to generate any electricity for supply to any other person:—</p> <p>.....</p> <p>l. anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166.</p>	Support	The definition reflects that provided in the RMA and is therefore supported.	Retain the definition as notified
minor earthworks <i>means earthworks for the purposes of piling, trenching, geotechnical investigations, interments within existing cemeteries or urupā, soakpits, stormwater detention tanks, rainwater tanks, wastewater mitigation tanks, and the replacement or removal of underground petroleum storage systems.</i>	Support	Transpower is not opposed to a definition for minor earthworks, but within the rules it seeks clarification that such earthworks will be subject to the National Grid Yard rules for Earthworks. While the activities prescribed in the definition are likely to be of a minor nature, there is no control or limit on the size or scale of the earthworks or proximity to National Grid assets. It is noted the corresponding rule provides permitted activities which it is anticipated the 'minor earthworks' will be able to comply with.	Retain the definition but ensure the National Grid Yard rules apply.
National Grid <i>has the same meaning as in section 3 of the National Policy Statement on Electricity Transmission 2008 (as set out below) means the assets used or owned by Transpower NZ Limited.</i>	Support	The definition is supported on the basis it will assist with plan interpretation in providing clarity as to the assets forming part of the National Grid.	Retain the definition as notified
National Grid Subdivision Corridor <i>means, as depicted in Diagram 1, the area measured either side of the centre line of any above ground electricity transmission line as follows:</i> <p>a. 32m of a 110kV transmission line on towers, and</p> <p>b. 37m of a 220kV transmission line.</p> <p><i>The measurement of setback distances from the National Grid shall be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</i></p> <p>Note: <i>The National Grid Subdivision Corridor does not apply to underground cables or any transmission lines (or sections of line) that are designated.</i> <i>Diagram 1: National Grid Yard and National Grid Subdivision Corridor.</i></p>	Amend	<p>The inclusion of a National Grid Subdivision Corridor definition is supported on the basis that it gives effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the National Grid Yard and National Grid Subdivision Corridor promoted by Transpower for the National Grid. Notwithstanding the support, Transpower submits that minor amendments to the definition text are necessary to:</p> <ul style="list-style-type: none"> Recognise the Oteranga Bay - Haywards A 350kV line (OTB-HAY A) Replace the diagrams to provide clear direction to District Plan users on how the National Grid Subdivision Corridor is to be measured. Transpower considers these an improvement on the notified diagrams. 	<p>Amend the definition as follows:</p> <p><i>National Grid Subdivision Corridor means, as depicted in <u>by the green arrow in the diagrams below, Diagram 1</u>, the area measured either side of the centre line of any above ground electricity transmission line as follows:</i></p> <p>a. 32m of a 110kV transmission line on towers;and</p> <p>b. 37m of a 220kV transmission line;and</p> <p>c. <u>39m of a 350kV transmission line.</u></p> <p><i>The measurement of setback distances from the National Grid shall be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure.</i></p>



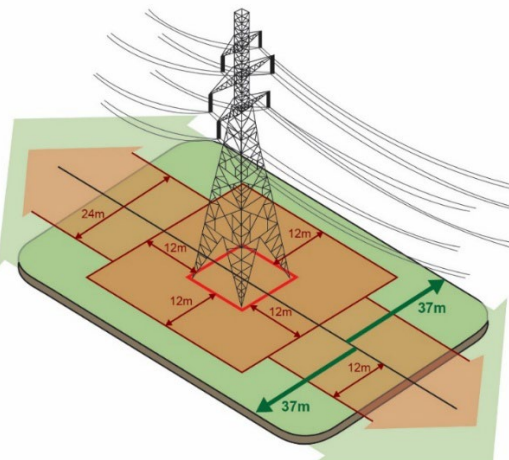
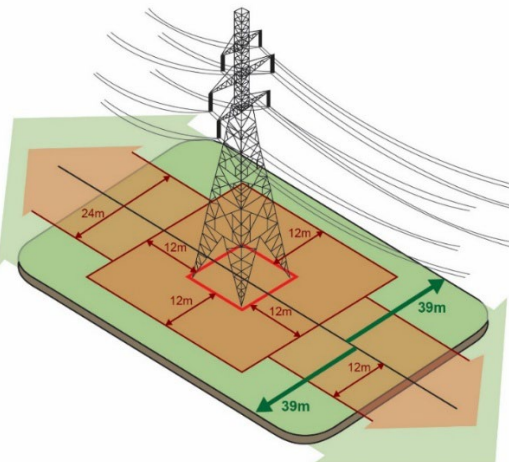
The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.

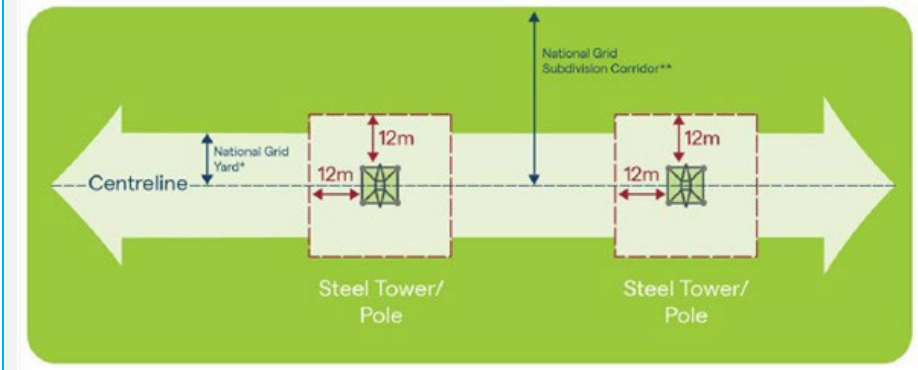
Note:
The National Grid Subdivision Corridor does not apply to underground cables or any transmission lines (or sections of line) that are designated.

Diagram 1: National Grid Yard and National Grid Subdivision Corridor.



Steel Lattice Tower - 110kV Transmission Line

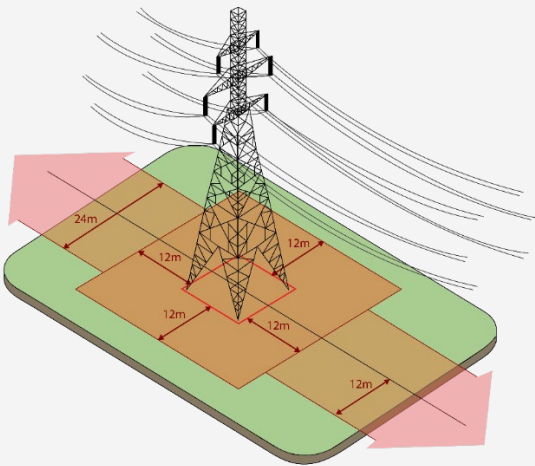
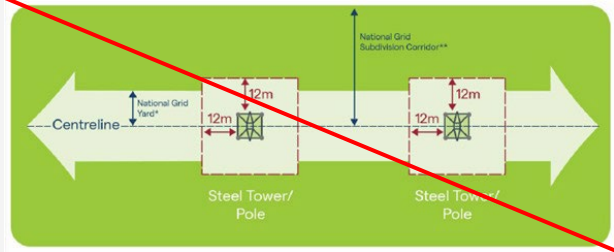
			<div></div> <p>Steel Lattice Tower - 220kV Transmission Line</p> <div></div> <p>Steel Lattice Tower - 350kV Transmission Line</p>
<p>National Grid Yard means as depicted in Diagram 1:</p> <ul style="list-style-type: none">a. the area located within 12m either side of the centreline of an above ground transmission line on that is 110kV or greater, andb. the area located within 12m in any direction from the outer visible edge of an electricity transmission support structure, associated with a line which is 110kV or greater. <p>The measurement of setback distances from the National Grid must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure. The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.</p> <p>Note: The National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated. Diagram 1: National Grid Yard and National Grid Subdivision Corridor.</p>	<p>Amend</p>	<p>The provision of a National Grid Yard definition is supported on the basis that it gives effect to the NPSET and specifically policies 10 and 11 which establish the mandate for the National Grid Yard and subdivision corridor approach promoted by Transpower for the National Grid.</p> <p>Notwithstanding the support, Transpower seeks a change in the diagram to provide clear direction to District Plan users on how the National Grid Yard is to be measured. Transpower considers these an improvement on the notified diagrams.</p>	<p>Amend the definition as follows:</p> <p>National Grid Yard means as depicted in <u>the area in orange in</u> Diagram 1:</p> <ul style="list-style-type: none">a. the area located within 12m either side of the centreline of an above ground transmission line on that is 110kV or greater, andb. the area located within 12m in any direction from the outer visible edge of an electricity transmission support structure, associated with a line which is 110kV or greater. <p>The measurement of setback distances from the National Grid must be undertaken from the centre line of the National Grid transmission line and the outer edge of any support structure.</p>



The centre line at any point is a straight line between the centre points of the two support structures at each end of the span.

Note:
The National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated.

Diagram 1: National Grid Yard and National Grid Subdivision Corridor.



Steel Lattice Tower

<p>regionally significant infrastructure means regionally significant infrastructure including:</p> <p>...</p> <p>d. the National Grid,</p> <p>.....</p>	Support	Transpower supports the provision of a definition for RSI that makes specific reference to the National Grid.	Retain the definition as notified
<p>reverse sensitivity Activity A causes reverse sensitivity to Activity B when:</p> <ol style="list-style-type: none">Activity A is a sensitive activity, or a potential activity that would be a sensitive activity, in relation to the effects of Activity B, andActivity B is:<ol style="list-style-type: none">An existing activity provided for by a designation, and the effects are the same or similar in character, intensity, and scale to those that existed on 6 February 2025, orAn activity provided for by a designation whose notice of requirement was lodged on or after 6 February 2025, or	Oppose	<p>Transpower is not opposed to the provision of a definition for reverse sensitivity but is opposed to the notified definition on the basis it is overly complex and difficult to interpret and apply. The application of the definition is complicated by the addition of ‘and’s at the end of each clause, meaning all the clauses are conjunctive.</p> <p>Transpower would support the definition as provided in the operative Wellington Regional Policy Statement. This would provide a consistent approach across the region.</p>	<p>Delete the definition and replace with a simplified edition.</p> <p>An example of a potential definition is as follows:</p> <p><u>means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.</u></p>

<p>c. An activity or potential activity that the zone in which it is located provides for as a predominant activity, or</p> <p>d. An activity with a functional need or operational need to locate where it is located, and</p> <p>3. Activity A is not provided for by a designation, and</p> <p>4. Activity A:</p> <p>a. Is not an activity that the zone in which it is located provides for as a predominant activity, or</p> <p>b. Was or would be established after Activity B, or</p> <p>c. Was not or would not be lawfully established, and</p> <p>5. The establishing, upgrading, operating, or maintaining of Activity B would have more than minor adverse effects on Activity A (including effects of a type not managed under the Resource Management Act), and</p> <p>6. The person carrying out Activity B takes the best practicable option to avoid, remedy, or mitigate those effects on Activity A, and</p> <p>7. The person carrying out Activity B has not contributed to either the establishment or the sensitivity of Activity A (for example through selling the person conducting Activity A the land on which that activity occurs), and</p> <p>8. The person carrying out Activity B has used all other lawful and reasonable powers available to them to manage or avoid the reverse sensitivity issue, and</p> <p>9. Despite (6), (7) and (8), Activity B has a significant potential to be constrained in its establishment, upgrading, operation, or maintenance because of regulation under the Resource Management Act 1991, the Health and Safety at Work Act 2015, the Hazardous Substances and New Organisms Act 1996, or other comparable legislation or bylaws that relate to management of the effects of Activity B on Activity A, and</p> <p>10. That constraint could be avoided, remedied, or mitigated through preventing the establishment of Activity A in that location, or placing conditions on Activity A, and</p> <p>11. Considering the factors above, and all other relevant matters, it is reasonable to do so.</p> <p>For the avoidance of doubt, nothing in this plan requires or authorises any rule or condition that would in the guise of managing reverse sensitivity limit any person's right to freedom of expression and association as protected by the New Zealand Bill of Rights Act 1990, including their right to submit on any matter to which they would otherwise be entitled to submit.</p>			
<p>sensitive activities means, as the context requires:</p> <ol style="list-style-type: none"> activities most sensitive to natural hazards, activities potentially sensitive to natural hazards, activities sensitive to gas transmission infrastructure, activities sensitive to hazardous substance risks, activities sensitive to industry, activities sensitive to light, activities sensitive to noise, activities sensitive to privacy intrusion, or activities sensitive to the National Grid. 	Support	Transpower supports the definition on the basis it references the definition "activities sensitive to the National Grid".	Retain the definition as notified
<p>transmission line has the same meaning as in section 3 of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (as set out below)</p> <ol style="list-style-type: none"> means the facilities and structures used for, or associated with, the overhead or underground transmission of electricity in the National Grid; and includes transmission line support structures, telecommunication cables, and telecommunication devices to which paragraph a) applies; but 		<p>Throughout the PDP, the term "transmission lines" is used (primarily in rules) to assist in plan interpretation, Transpower therefore supports the term being defined as some plan users may not be aware the term applies to the National Grid.</p> <p>However, Transpower has concerns the exclusion of substations would have policy implications for the upgrade of any existing substation in that INF-P8</p>	<p>Amend the definition to include substations or amend INF-P8 clause 7. To also refer to substations.</p> <p>The amendment to the definition could be as follows: <i>transmission line</i> has the same meaning as in section 3 of the Resource Management (National Environmental Standards for</p>

c. does not include an electricity substation.		clause 7 refers to 'transmission lines' when recognising the benefits of upgrades.	<i>Electricity Transmission Activities) Regulations 2009 (as and includes the National Grid (as defined), set out below)</i> a. means the facilities and structures used for, or associated with, the overhead or underground transmission of electricity in the National Grid; and b. includes transmission line support structures, telecommunication cables, and telecommunication devices to which paragraph a) applies; but c. does not include an electricity substation.
Upgrading as it applies to infrastructure, means the improvement, relocation, replacement, or increase in carrying capacity, operational efficiency, size, pressure, security or safety of existing infrastructure, but excludes maintenance and repair.	Neutral	On the basis the NESETA regulates the upgrade of existing National Grid assets, Transpower is neutral on the definition.	Retain the definition as notified.
Strategic direction			
INFSD-03 National and Regional Significance Infrastructure of national and regional significance is supported and protected	Amend	While Transpower supports INFSD-03, it seeks amendment to include 'recognised and provided for' to give effect to the NPSET. The term 'supported' is not widely used or understood within context of the objective. It is also not clear what infrastructure constitutes 'national or regional importance' given the terms are not defined. As an alternative, Transpower would support a National Grid specific strategic direction as outlined in the submission point below.	Amend as follows: <i>INFSD-03 National and Regional Significance Infrastructure of national and regional significance is supported and protected, <u>recognised and provided for.</u></i>
Insert a new National Grid specific strategic objective.	Amend	Transpower supports the provision of a new strategic objective specific to the National Grid on the basis it gives effect to the NPSET and provides specific recognition in the PDP of the national significance of the National Grid.	Insert a new INF-SD as follows: <i><u>INFSD-07: National Grid</u></i> <i><u>The significance of the National Grid is recognised, and sustainable, secure and efficient electricity transmission is provided through and within the city</u></i>
Insert a new specific strategic direction relating to the effects on significant infrastructure	Amend	Transpower supports the provision of a new strategic objective specific to the effects of activities on significant infrastructure on the basis it gives effect to the NPSET and provides specific direction on the 'protection' reference within INFSD-03.	Insert a new INFSD as follows: <i><u>INFSD-08: Effects on Significant infrastructure</u></i> <i><u>Infrastructure of national and regional significance (which includes the National Grid), operates efficiently and safely and is protected from incompatible development and activities that may compromise the operation. maintenance and upgrade of significant infrastructure, and may create reverse sensitivity effects</u></i>
General Approach			
Introduction Other chapters only apply to overlays or other spatially identified areas. You will need to consult these chapters if your activity is within one of the chapter's overlays or other spatial areas:	Support	Transpower supports the clarification provided in the plan to assist with plan interpretation and application.	Retain the provisions in the General Approach

<ul style="list-style-type: none"> • Historical Heritage • Notable Trees • Sites and Areas of Significance to Māori • Natural Character • Natural Features and Landscapes • Coastal Environment • Protection of Infrastructure 			
<p>Introduction</p> <p>Finally, some chapters provide an all-in-one framework for specific activities that overrides provisions in zones. Other district-wide chapters will be relevant, but if covered by one of these chapters, you will not need to refer to the zone unless a district-wide chapter directs you to:</p> <ul style="list-style-type: none"> • Renewable Electricity Generation • Infrastructure • Temporary Activities 	Support	Transpower supports the clarification provided in the plan to assist with plan interpretation and application.	Retain the provisions in the General Approach
Infrastructure Chapter			
<p>Introduction</p> <p>This chapter outlines the provisions of the District Plan that relate to the operation and development of infrastructure.</p> <p>Infrastructure enables a community to undertake its everyday activities and functions and allows people to provide for their social and economic wellbeing, and their health and safety. The infrastructure managed through this chapter include those defined as infrastructure under section 2 of the Resource Management Act.</p> <p>The successful functioning of the city depends on infrastructure. It is important that construction, maintenance, upgrade and operation of these services be provided for, that technical and geographical constraints on the operation of networks are acknowledged, and that the benefits derived from them are recognised. However, infrastructure can also have adverse effects on the environment resulting from their construction, operation or associated maintenance activities.</p>	Support	Transpower supports the provision of an Infrastructure Chapter and the introductory text	Retain the introductory text
<p>Introduction</p> <p>Other regulatory requirements</p> <p>Additional regulatory requirements, which are separate to the District Plan or Regional Council planning documents, but are relevant to infrastructure include:</p> <ul style="list-style-type: none"> • The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA), • The Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF), • The National Code of Practice for Utility Operators' Access to Transport Corridors, • The New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), and • Electricity (Hazards from Trees) Regulations 2003. 	Support	Transpower supports the introductory text which outlines other regulatory requirements, and in particular the NESETA.	Retain the introductory text "Other regulatory requirements."
<p>Introduction</p> <p>Relationship with other chapters</p> <p>The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to</p>	Amend	As noted in an earlier submission point, Transpower supports the provision of an Infrastructure ("INF") Chapter, noting it contains the policy and rule framework to manage the effects of the National Grid (noting provisions to manage the effects of (other) activities on the Grid is managed in the Protection of Infrastructure Chapter, Earthwork activities within the National	Amend as follows: Relationship with other chapters The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. <u>As many infrastructure</u>

<p>infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant.</p> <p>The Infrastructure chapter does not include provisions which address the following:</p> <ul style="list-style-type: none"> • Green infrastructure and flood mitigation works (Natural Hazards chapter), • Hard engineering coastal hazard mitigation works (Coastal Hazards chapter), • Vehicle crossings (Transport chapter), • Subdivision which creates allotments for infrastructure purposes (Subdivision chapter), and • Protection of infrastructure from adverse effects of land use and development, including: <ul style="list-style-type: none"> - Protection of gas transmission infrastructure and the National Grid from activities and buildings and structures (Protection of Infrastructure chapter), - Earthworks within the National Grid Yard (Earthworks chapter), - Subdivision within the Gas Transmission Pipeline Corridor and the National Grid Subdivision Corridor (Subdivision chapter), and - Activities sensitive to noise within the Highway and Railway Noise Overlay (Noise chapter). 		<p>Grid Yard are addressed in the Earthworks chapter, and subdivision within the National Grid Subdivision Corridor is addressed in the Subdivision Chapter).</p> <p>While the chapter is supported, Transpower requests that the chapter largely be standalone (at the very least in relation to the National Grid) and that this be made explicitly clear within the introduction to the chapter.</p> <p>Transpower notes the INF Chapter provides for a specific policy direction for infrastructure within overlay areas (Policies INF-P9 – P14) and therefore Transpower assumes the intent is that the INF Chapter be standalone. This intent is further demonstrated in lack of reference to Infrastructure activities within policies within the specific overlay chapters</p> <p>Specific to the National Grid, Policy INF-P8 provides policy direction for certain overlay areas (being Outstanding Natural Features and Landscapes, and High and Very High Coastal Natural Character Areas), and therefore Transpower assumes the intent is that the Infrastructure Chapter is stand alone in respect of managing the effects of the National Grid.</p> <p>In order to provide clarity to plan users, Transpower would support amendment to the wording to clarify the Infrastructure Chapter is largely stand alone, with those exemptions clearly identified.</p>	<p><u>assets are linear and traverse many parts of the district, it is considered appropriate that a single set of rules, objectives and policies be provided that apply to Infrastructure across the City. As such, the Infrastructure chapter is stand alone as it applies to Infrastructure and Network Utility Operators. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant. The exceptions to this are The Infrastructure chapter does not include provisions which address the following:</u></p> <ul style="list-style-type: none"> • <u>Notable Trees (Notable Trees Chapter)</u> • <u>Historic Heritage (Historic Heritage Chapter)</u> • <u>Ecosystems and Indigenous Biodiversity (Ecosystems and Indigenous Biodiversity Chapter)</u> • Green infrastructure and flood mitigation works (Natural Hazards chapter), • Hard engineering coastal hazard mitigation works (Coastal Hazards chapter), • Vehicle crossings (Transport chapter), • Subdivision which creates allotments for infrastructure purposes (Subdivision chapter), and • Protection of infrastructure from adverse effects of land use and development, including: <ul style="list-style-type: none"> - Protection of gas transmission infrastructure and the National Grid from activities and buildings and structures (Protection of Infrastructure chapter), - Earthworks within the National Grid Yard (Earthworks chapter), - Subdivision within the Gas Transmission Pipeline Corridor and the National Grid Subdivision Corridor (Subdivision chapter), and - Activities sensitive to noise within the Highway and Railway Noise Overlay (Noise chapter). <p>As an alternative to the above sought wording applying to Infrastructure, Transpower would support the sought wording being specific to the National Grid</p>
<p>INF-O1 Benefits of infrastructure</p> <p>The national, regional and local benefits of infrastructure are recognised and provided for.</p>	Support	<p>Transpower supports the objective. While the objective is not specific to the National Grid, the reference to ‘recognised and provided for’ gives effect to the NPSET. The objective is given effect to primarily through policies INF-P1 and INF-P2.</p>	Retain the objective as notified
<p>INF-O2 Adverse effects of infrastructure</p> <p>The adverse effects of infrastructure on the environment are effectively managed while recognising the functional needs and operational needs of infrastructure.</p>	Support	<p>Transpower supports the objective. In particular Transpower supports the reference that effects are ‘managed’ and the recognition of operational needs.</p>	Retain the objective as notified

<p>INF-P1 Recognise benefits of infrastructure <i>Recognise the social, economic, cultural and environmental benefits that infrastructure provide, including:</i></p> <ol style="list-style-type: none"> 1. Enabling enhancement of the quality of life and standard of living for people and communities, 2. Providing for public health and safety, 3. Enabling businesses to function, 4. Enabling growth and development, 5. Enabling the transportation of freight, goods and people, 6. Providing a lifeline during emergencies, and 7. Enabling the effective, safe, secure and efficient transmission of electricity. 	Support	<p>Transpower supports the policy directive to recognise benefits. Notwithstanding the policy is not specific to the National Grid, the recognition gives effect to NPSET Policy 1. While the policy does not refer to ‘provide for’ as provided in NPSET Policy 1, the ‘enable’ directive within clause 7. gives effect to the NPSET, and INF-P2 has a clear policy directive to ‘enable’ existing infrastructure and ‘provide’ for major upgrades and the development of new infrastructure.</p> <p>Based on the above given the directive policy wording, the corresponding consenting framework needs to give effect to the policy directive.</p>	Retain the policy as notified
<p>INF-P2 Provide for infrastructure <i>Provide for infrastructure by:</i></p> <ol style="list-style-type: none"> 1. Enabling safe, resilient, effective, and efficient operation, maintenance, repair, minor upgrade, or decommissioning of infrastructure, 2. Providing for other upgrades to, and the development of new infrastructure, and 3. Enabling investigation and monitoring activities associated with infrastructure operations. 	Support	<p>Transpower supports the policy directive to provide for infrastructure. Transpower notes the clause 1 of the policy is the primary policy in relation to existing National Grid assets, and on the basis of the ‘enabling’ directive within the policy, is supported. While the policy is not specific to the National Grid, it gives effect to NPSET Policy 2 and Policy 5. On the basis of other more specific policies in relation to the National Grid, Transpower supports the retention of the policy as notified.</p>	Retain the policy as notified
<p>INF-P3 Planning and delivery of infrastructure <i>Ensure that infrastructure planning and delivery is coordinated and responsive by:</i></p> <ol style="list-style-type: none"> 1. Ensuring development of infrastructure is integrated with other land use, subdivision, development, and urban growth. 2. Enabling infrastructure to be delivered at a rate which is responsive to the reasonably foreseeable needs of Lower Hutt, including with consideration to population growth. 3. Ensuring that infrastructure is resilient or adaptable to impacts of natural hazards and climate change. 4. Ensuring that infrastructure is able to adapt to changing user requirements and technologies. 5. Encouraging the co-location of infrastructure, including the utilisation of existing designations and the use of roads as infrastructure corridors. 6. Ensuring the provision and operation of infrastructure that cross jurisdictional boundaries is managed in an integrated manner. 	Support	<p>Transpower supports the policy, in particular the ‘encourage’ element in clause 5. (thereby recognising that co- location is not always possible or appropriate), and the integrated directive within clause 6.</p>	Retain the policy as notified
<p>INF-P4 Technological advances <i>Provide flexibility to adopt new technologies for infrastructure that:</i></p> <ol style="list-style-type: none"> 1. Allow for the re-use of redundant services and structures, or 2. Increase resilience, safety, efficiency or reliability of networks and services, or 3. Facilitate a transition to renewable electricity, or 4. Result in environmental benefits or enhancements, or 5. Promote environmentally sustainable outcomes. 	Support	<p>Transpower supports the policy and the recognition of technological advances.</p>	Retain the policy as notified.
<p>INF-P5 Adverse effects of infrastructure <i>Avoid, remedy, or mitigate the adverse effects of infrastructure, as far as practicable, including effects on:</i></p> <ol style="list-style-type: none"> 1. Natural and physical resources, 2. Amenity values, 3. Natural hazard and climate change risks, 4. Identified features and values within any specified overlay, 5. Any other matter of national importance, 	Support	<p>Policy INF-P4 is general in nature in that it provides a ‘avoid, remedy or mitigate’ directive within context of a range of effects. The policy directive is supported, noting that more specific policies are provided for a number of the clauses.</p> <p>Given the policy applies to existing and new assets, the reference to ‘as far as practicable’ is supported.</p>	Retain the policy as notified.

6. The safe and efficient operation of other infrastructure, and 7. The health, well-being and safety of people and communities.			
<p>INF-P6 Consideration of the adverse effects of infrastructure When considering the adverse effects of infrastructure on the environment, have regard to the following:</p> <ol style="list-style-type: none"> 1. The time, duration and frequency of adverse effects, 2. Recognising that co-location of infrastructure, shared use of infrastructure corridors and undergrounding of infrastructure provide opportunities for avoiding and minimising adverse effects, 3. Where adverse effects cannot be avoided due to the functional needs and operational needs of the infrastructure to be in that location, then the extent to which those adverse effects are minimised by the infrastructure design or operation, 4. Where adverse effects cannot be avoided or minimised, then the extent to which those adverse effects can be remedied, mitigated or offset, 5. Anticipated outcomes for the receiving environment and the degree to which past modifications have compromised the achievement of those outcomes, and 6. Where located in a specified overlay, the degree to which the identified features and values of locations in the overlay, or site or area of significance will be protected from adverse effects and preserved, including with consideration to whether adverse effects on these values and features are avoided due to being: <ol style="list-style-type: none"> a. No more than minor or transitory, or b. Remedied, mitigated or offset. 	Amend	<p>Policy INF-P6 is broad in its application in that it would apply to both existing and new National Grid infrastructure. Transpower is not opposed in principle to the policy but seeks amendment to the policy to allow consideration of the benefits of the activity, as well as deletion of clause 6. on the basis overlays are addressed in subsequent specific policies. The clause is also confusing in that while it refers to ‘consideration as to where adverse effects... are avoided’ it then refers to remedied, mitigated or offset. The wording implies that effects can be ‘avoided’ through remediation, mitigation or offsetting. Regardless of whether this is the intent of the wording, this potential interpretation is not correct. The policy directive within clause d. also contrasts with the policy directive in the later policies in that while b. references consideration as to whether adverse effects are remedied, mitigated or offset, the later policies have a clear directive to avoid adverse effects and avoid significant adverse effects.</p> <p>An amendment is also sought to clause 2. to recognise that co-location and underground are not always possible or practicable (specifically as they relate to the high voltage transmission network) and therefore may only be appropriate in context of operational constraints.</p> <p>Clause 5. also refers to ‘anticipated outcomes for the receiving environment’. In context of the policy being applied to infrastructure, it is not clear what these are. Are they the outcomes of the activity or the outcomes for the receiving environment? If it is the latter, where are such outcomes specified? The appropriateness of the clause is also not clear in terms of the basis for revisiting lawfully established activities. Given the lack of clarity, deletion of the clause is sought.</p>	<p>Amend policy INF-P6 as follows:</p> <p><i>INF-P6 Consideration of the adverse effects of infrastructure</i> <i>When considering the adverse effects of infrastructure on the environment, have regard to the following:</i></p> <ol style="list-style-type: none"> 1. The time, duration and frequency of adverse effects, 2. Recognising that <u>subject to operational constraints</u>, co-location of infrastructure, shared use of infrastructure corridors and undergrounding of infrastructure provide opportunities for avoiding and minimising adverse effects, 3. Where adverse effects cannot be avoided due to the functional needs and operational needs of the infrastructure to be in that location, then the extent to which those adverse effects are minimised by the infrastructure design or operation, 4. Where adverse effects cannot be avoided or minimised, then the extent to which those adverse effects can be remedied, mitigated or offset, <u>and</u> 5. Anticipated outcomes for the receiving environment and the degree to which past modifications have compromised the achievement of those outcomes, and 6. Where located in a specified overlay, the degree to which the identified features and values of locations in the overlay, or site or area of significance will be protected from adverse effects and preserved, including with consideration to whether adverse effects on these values and features are avoided due to being: <ol style="list-style-type: none"> a. No more than minor or transitory, or b. Remedied, mitigated or offset. <u>The benefits derived from the infrastructure at a local, regional and national scale.</u>
<p>INF-P8 Upgrading and developing the National Grid Provide for upgrading and developing of the National Grid, while:</p> <ol style="list-style-type: none"> 1. Avoiding adverse effects on: <ol style="list-style-type: none"> a. The City Centre Zone, b. Existing activities sensitive to the National Grid where located within urban areas, c. The identified values of Outstanding Natural Features, and d. The identified values of Outstanding Coastal Natural Character Areas. 2. Seeking to avoid adverse effects on: <ol style="list-style-type: none"> a. Existing activities sensitive to the National Grid where located within rural environments, b. The identified values of Outstanding Natural Landscapes, and c. The identified values of High and Very High Coastal Natural Character Areas. 3. Minimising adverse effects on urban amenity where located within urban areas, 4. Remedying or mitigating, to the extent practicable, any adverse effects which cannot be avoided or minimised, and 5. Having regard to the following matters while considering any adverse effects: <ol style="list-style-type: none"> a. Enabling upgrades which have minor adverse effects on the environment, 	Amend	<p>Transpower supports the provision of a specific National Grid policy. The NPSET recognises the national significance of the National Grid and provides a suite of specific policies which are required to be given effect to in the district plan. Associated with the development of National Grid assets is the potential for adverse environmental effects. The development of the National Grid must therefore be managed to ensure that the potential for adverse effects is appropriately managed while recognising the significance of the National Grid and the constraints under which it operates. The NPSET requires the District Plan to include objectives and policies that:</p> <ul style="list-style-type: none"> • Allow for the consideration of technical constraints and operational requirements under which the National Grid operates e.g. the linear nature of the transmission lines (NPSET Policy 3). • Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site, and method selection process (NPSET Policy 4). • Ensure planning and development of the National Grid has regard to the existing environment (NPSET policies 6, 7 and 8). 	<p>Amend policy INF-P8 as follows:</p> <p><u>INF-P8 Upgrading and developing the National Grid</u> <u>In providing for upgrading (that is not a minor upgrade) and developing of the National Grid:</u></p> <ol style="list-style-type: none"> 1. <u>Have regard to the extent to which any adverse effects have been avoided, remedied or mitigated, including by the route, site and method selection and techniques and measures proposed;</u> 2. <u>Recognise the constraints arising from the operational needs and functional needs of the National Grid, and the existing nature of the assets, when considering measures to avoid, remedy or mitigate any adverse effects;</u> 3. <u>Recognise the potential benefits of upgrades and development to people and communities;</u>

- b. Except where clause 1 of this policy applies, considering the constraints arising from the operational needs, functional needs, and technical requirements of the National Grid, on the ability to avoid, remedy or mitigate adverse effects,
- c. Whether any adverse effects have been avoided, remedied or mitigated by the route, site and method selection, and
- d. Opportunities provided by any substantial upgrades to reduce existing adverse effects of the National Grid, including on activities sensitive to the National Grid.

Note:

Upgrading and developing the National Grid is excluded from:

INF-P11: New or upgraded infrastructure in Coastal Natural Character Areas,

INF-P12: New or upgraded infrastructure in Outstanding Natural Features and Outstanding Natural Landscapes, and

INF-P14: New or upgraded infrastructure in the Active Street Frontage Overlay.

This policy direction within the NPSET sets an appropriate assessment framework for National Grid infrastructure. The above means that policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and method selection process when considering the adverse effects of new National Grid infrastructure on the environment. Policies 6, 7 and 8 provide further policy directives in relation to certain environments with a 'should' policy directive to:

- Using substantial upgrades as an opportunity to reduce existing adverse effects on sensitive activities where appropriate.
- Within urban environments, minimising adverse effects on urban amenity and avoid adverse effects on town centres and area of high recreational value or mandatory and existing sensitive activities.
- Within rural environments, seek to avoid adverse effects on outstanding natural features, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

It is evident the PDP has attempted to capture the various policies of the NPSET. However Transpower has concerns the intent of the NPSET has been lost through the drafting. In terms of context and how the policy as drafted would be applied to existing and new National Grid assets, there are no existing assets within any of the following overlays: Outstanding Natural Features, Outstanding Natural Landscapes, Outstanding Coastal Natural Characters Areas, High and Very High Coastal Natural Character areas, the Coastal Environment. There are also no identified Significant Natural Areas in the PDP. The existing assets do extend over a number of zones being the Medium Density Residential Zone, Large Lot Residential Zone, General Industrial Zone, Light Industrial Zone, Open Space Zone, Natural Open Space Zone, General Rural Zone, Rural Lifestyle Zone, Sport and Active Recreation Zone, and Quarry zone. Existing assets are also within the Flood Hazard Overlays, Slope assessment overlay, and Sites and Areas of Significance to Māori.

Specific concerns with the policy are as follows:

- The 'should' directive within NPSET policies 6, 7 and 8 has not been carried through into the clauses of INF-P8. Transpower submits the word "should" suggests that a course of action is strongly recommended or ought to be done, but that there may be occasions where it is acceptable to deviate from that standard. They specify things that Transpower 'should' do (in other words they state obligations in terms of a strongly recommended or expected course of action, rather than a mandatory outcome).
- The avoid directive within clause 1. ignores the 'should' directive of the NPSET. Sub clauses c. and d. are not confined to urban areas and there the avoid directive does not give effect to NPSET Policy 8.
- The rationale for clause 5.a is not clear as any upgrade that has only minor effects should not be captured by the policy and instead is managed under the policy directive of NPSET Policy 5.
- It is not clear why clause 5.b. is excluded from applying to clause 1., as Policy 3 of the NPSET universally applies to operation, maintenance, upgrade and development.

4. In relation to upgrading of the National Grid (that is not a minor upgrade):
 - a. Where appropriate, consider opportunities to reduce existing adverse effects of the National Grid as part of any substantial upgrade; and
 - b. Remedying or mitigating, to the extent practicable, any adverse effects which cannot be avoided or minimised;
5. In relation development of the National Grid:
 - a. In urban zones and open space zones within an urban area: and
 - i. adverse effects on urban amenity should be minimised; and
 - ii. adverse effects on the Metropolitan Centre Zone, City Centre Zone, areas of high recreational or amenity value, and existing sensitive activities should be avoided;
 - b. Seek to avoid the adverse effects of the National Grid within areas identified in SCHED4 - Outstanding Natural Features and Landscapes outside of the Coastal Environment, SCHED1 – Heritage Buildings and structures, SCHED2 – Heritage Areas, and SCHED6 – Sites and Areas of Significance to Māori.
 - c. Allow development to proceed where the National Grid has a functional or operational need to locate within the Coastal Environment and
 - i. It is not practicable to avoid adverse effects within areas identified in, SCHED4 - Outstanding Natural Features and Landscapes inside of the Coastal Environment, SCHED5 - Outstanding Coastal Natural Character Areas and High and Very High Coastal Natural Character Areas, and indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010, provided satisfactory measures are taken to remedy or mitigate the residual adverse effects; and
 - ii. Seek to avoid significant adverse effects on other areas of natural character, natural attributes and character of other natural features and landscapes, and indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010, and avoiding, remedying or mitigating other adverse effects to the extent practicable.
 - d. Remedying or mitigating, to the extent practicable, any adverse effects which cannot be avoided or minimised; and
6. In the event of conflict, Policy INF-P8 prevails over other provisions in the Plan.

		<ul style="list-style-type: none"> There are no existing assets within or within proximity of overlays relating to Outstanding Natural Features, Outstanding Natural Landscapes, Outstanding Coastal Natural Characters Areas, High and Very High Coastal Natural Character areas, the Coastal Environment. There are also no identified Significant Natural Areas in the PDP. As such, an 'avoid' or 'seek to avoid' policy directive for existing National Grid assets is not appropriate. <p>Given the difference (from both a policy directive in the NPSET and the nature of the existing assets within Hutt City), Transpower seeks the splitting of the policy as it relates to upgrading and development, with general clauses to apply to both activities. The specifics of the sought clauses are as follows:</p> <ul style="list-style-type: none"> Reference to Upgrading and Development in the chapeau, with an exclusion for minor upgrading as this is provided for in INF-P2. The application of the provisions within INF-P8 to the minor upgrading of existing assets would not give effect to the NPSET and its strong policy recognition of existing assets. Clause 1 gives effect NPSET Policy 4 and applies to both upgrades and development. Clause 2 gives effect to NPSET Policy 3 and applies to both upgrades and development. Clause 3 gives effect to NPSET Policy 1 and applies to both upgrades and development. Clause 4 gives effect to NPSET Policies 6, and 7 and reflects the urban area focus of the policy. Clause 4.a gives effect to NPSET Policy 6 and adopts the words 'where appropriate'. Clause 4.b. is the default action beyond avoidance. The clause (and wider policy) recognises the existing nature of the assets, hence the different policy approach for new development. The approach for existing assets has to recognise the linear nature of the National Grid and that changes to existing assets can have wider implications and effects. Clause 5. relates to development and gives effect to NPSET Policies 7 and 8. Clause 5.a. reflects that for Clause 4.a. but includes the city centre zones. Clause 5.b gives effect to the 'seek to avoid' policy directive within NPSET Policy 8. The higher values areas are identified in the clause. Clause 5.c relates to the Coastal Environment and gives effect to the policy directive within the NZCPS in relation to indigenous biodiversity, natural character and natural features and landscapes. Clause 5.d is the default action beyond avoidance. Clause 6 provides direction on the relationship and reconciliation between policies in the PDP. While Transpower supported in principle the Note within the notified policy, the Note only related to certain overlays and therefore created a policy gap for other areas and features (such as SASMs, Historic Heritage, Coastal and Riparian Margins) which resulted in an avoid directive for the National Grid. The policy directive in other INF polices (and policies in other chapters) does not give effect to the NPSET. <p>Transpower notes the policy and the INF Chapter more broadly does not reference indigenous biodiversity. Given that the PDP does not identify SNA's and permits vegetation clearance outside the residential and Natural Open</p>	<p>1. Avoiding adverse effects on:</p> <p>a. The City Centre Zone,</p> <p>b. Existing activities sensitive to the National Grid where located within urban areas,</p> <p>c. The identified values of Outstanding Natural Features, and</p> <p>d. The identified values of Outstanding Coastal Natural Character Areas.</p> <p>2. Seeking to avoid adverse effects on:</p> <p>a. Existing activities sensitive to the National Grid where located within rural environments,</p> <p>b. The identified values of Outstanding Natural Landscapes, and</p> <p>c. The identified values of High and Very High Coastal Natural Character Areas.</p> <p>3. Minimising adverse effects on urban amenity where located within urban areas,</p> <p>4. Remedying or mitigating, to the extent practicable, any adverse effects which cannot be avoided or minimised, and</p> <p>5. Having regard to the following matters while considering any adverse effects:</p> <p>a. Enabling upgrades which have minor adverse effects on the environment,</p> <p>b. Except where clause 1 of this policy applies, considering the constraints arising from the operational needs, functional needs, and technical requirements of the National Grid, on the ability to avoid, remedy or mitigate adverse effects,</p> <p>c. Whether any adverse effects have been avoided, remedied or mitigated by the route, site and method selection, and</p> <p>d. Opportunities provided by any substantial upgrades to reduce existing adverse effects of the National Grid, including on activities sensitive to the National Grid.</p> <p>Note:</p> <p>Upgrading and developing the National Grid is excluded from:</p> <p>INF-P11: New or upgraded infrastructure in Coastal Natural Character Areas,</p> <p>INF-P12: New or upgraded infrastructure in Outstanding Natural Features and Outstanding Natural Landscapes, and</p> <p>INF-P14: New or upgraded infrastructure in the Active Street Frontage Overlay.</p>
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		Space zones, Transpower does not support a specific reference to indigenous biodiversity within INF-P8. Rather any effects on indigenous biodiversity would be addressed under Clause 1. Transpower anticipates that as part of any plan change to give effect to the NPS-IB, the matter will be comprehensively addressed across the PDP and appropriate provisions can be inserted at that stage.	
INF-P9 Upgrading and developing infrastructure in natural hazard overlays <i>Provide for new or upgraded infrastructure in natural hazard overlays where:</i> 1. There is a functional need or operational need for the infrastructure to be in that location, 2. Related buildings, structures or earthworks are of a scale and design that do not significantly increase natural hazard risk in High Flood Hazard Overlays and Medium Flood Hazard Overlays, and 3. Increases in natural hazard risk in identified high natural hazard overlays are avoided.	Support	Transpower supports the policy in so far as it provides a policy pathway for National Grid assets (both existing and new) within hazard overlay areas.	Retain the policy as notified.
INF-P10 Upgrading and developing infrastructure in coastal margins or riparian margins <i>Provide for new or upgraded infrastructure in coastal margins and riparian margins where:</i> 1. There is a functional need or operational need for the infrastructure to be in that location, and 2. Either: a. It is located on a bridge or other structure, or b. Is located in road reserve, or c. Related buildings, structures, or earthworks are of a scale and design that will minimise adverse effects on coastal or riparian environments.	Amend	On the basis Policy INF-P8 provides a specific policy framework for the National Grid, Transpower considers policies INF-P10 – P13 have limited relevance to the National Grid. Transpower's preference is for reliance on INF-P8 (as sought to be amended through this submission) as INF-P10 does not give effect to the NPSET. Transpower does note the intent of the wording of INF-P10 is not clear in that it is not clear what the policy directive is where clauses 1 and 2 are not met.	Amend the policy as follows: Note: <u><i>This policy does not apply to upgrading and developing the National Grid, which is covered by Policy INF-P8.</i></u> Should INF-P8 not be amended as sought in this submission, amendment is required to INF-P10 to give effect to the NPSET. Clarify the policy intent and directive for the policy should clauses 1 and 2 not be met.
INF-P11 Upgrading and developing infrastructure in coastal natural character areas <i>Provide for new or upgraded infrastructure in areas of High, Very High and Outstanding Coastal Natural Character where:</i> 1. There is a functional need or operational need for the infrastructure to be in that location and there are no practicable alternative locations or solutions, 2. Adverse effects on the identified values of the Outstanding Coastal Natural Character Area are avoided, 3. Significant adverse effects on the identified values of the High and Very High Coastal Natural Character Areas are avoided, and 4. Other adverse effects on coastal natural character are avoided, remedied, or mitigated. Note: This policy does not apply to upgrading and developing the National Grid, which is covered by Policy INF-P8.	Support	On the basis of Policy INF-P8 (as sought to be amended through this submission) Transpower largely supports INF-P11. Should the policy apply to the National Grid, it would need to be amended so as to give effect to the NPSET.	Retain the policy on the basis the amended policy INF-P8 prevails in relation to the National Grid.
INF-P12 Upgrading and developing infrastructure in Outstanding Natural Features and Outstanding Natural Landscapes <i>Provide for new or upgraded infrastructure in Outstanding Natural Features and Outstanding Natural Landscapes where:</i> 1. There is a functional need or operational need for the infrastructure to be in that location and there are no practicable alternative locations or solutions,	Support	On the basis of Policy INF-P8 (as sought to be amended through this submission) Transpower largely supports INF-P12. Should the policy apply to the National Grid, it would need to be amended so as to give effect to the NPSET.	Retain the policy on the basis the amended policy INF-P8 prevails in relation to the National Grid.

<p>2. Adverse effects on the identified values of the Outstanding Natural Feature and Outstanding Natural Landscape where located in the Coastal Environment are avoided,</p> <p>3. Significant adverse effects on the identified values of Outstanding Natural Feature and Outstanding Natural Landscape where located outside the Coastal Environment are avoided, and</p> <p>4. Other adverse effects on Outstanding Natural Features and Outstanding Natural Landscapes are avoided, remedied or mitigated.</p> <p>Note: This policy does not apply to upgrading and developing the National Grid, which is covered by Policy INF-P8.</p>			
<p>INF-P13 Upgrading and developing infrastructure in sites and areas of significance to Māori, heritage areas and sites containing heritage buildings or heritage structures</p> <p>Provide for new or upgraded infrastructure in sites and areas of significance to Māori, heritage areas and sites containing heritage buildings or heritage structures where:</p> <p>1. There is a functional need or operational need for the infrastructure to be in that location, and</p> <p>2. Significant adverse effects on the identified values of the overlay are avoided, and other adverse effects are avoided, remedied or mitigated.</p>	Amend	<p>On the basis Policy INF-P8 provides a specific policy framework for the National Grid, Transpower considers policies INF-P10 – P13 have limited relevance to the National Grid. Transpower’s preference is for reliance on INF-P8 (as sought to be amended through this submission) as INF-P13 does not give effect to the NPSET in that it contains an ‘avoid’ directive.</p>	<p>Amend the policy as follows:</p> <p>.....</p> <p>Note: <i>This policy does not apply to upgrading and developing the National Grid, which is covered by Policy INF-P8.</i></p> <p>Should INF-P8 not be amended as sought in this submission, amendment is required to INF-P13 to give effect to the NPSET.</p>
<p>Rules</p> <p>The rules of this chapter address the operation, maintenance, repair, removal, upgrading and development of infrastructure undertaken by network utility operators.</p> <p>The rules of this chapter address:</p> <ul style="list-style-type: none"> • General activities (INF-R1 to INF-R10), including: <ul style="list-style-type: none"> - Infrastructure involving radiofrequency fields (INF-R1), - Operation, maintenance, repair and decommissioning of infrastructure (INF-R2), - Upgrading (INF-R3), - Vehicle access tracks (INF-R4), - Temporary infrastructure (INF-R5), - Signs for the purpose of infrastructure (INF-R6), - Cabinets (INF-R7), - Infrastructure located within existing buildings (INF-R8), and - Underground pipelines and other structures (INF-R9 and INF-R10), • Aboveground telecommunications, radiocommunications and electricity distribution infrastructure (INF-R11 to INF-R14), • Gas transmission infrastructure (INF-R15 to INF-R16), • Electricity transmission infrastructure (INF-R17 to INF-R19), • Aboveground water infrastructure (INF-R20), • Transport infrastructure (INF-R21 to INF-R24), and • Infrastructure not otherwise provided for (INF-R25). <p>Operating, maintaining, repairing, upgrading, developing and decommissioning of infrastructure is excluded from all provisions in area-specific and other district-wide chapter, except for:</p> <p>a. Provisions for infrastructure activities which involve additions, alterations, relocation, or demolition of heritage buildings, heritage structures, or contributing buildings in heritage areas (located in the Historical Heritage chapter),</p> <p>b. Provisions for infrastructure activities which involve trimming or removal of Notable Trees (located in the Notable Trees chapter),</p> <p>c. Provisions for the removal of indigenous vegetation in the Natural Open Space Zone and residential zones (located in the Ecosystems and Indigenous Biodiversity chapter),</p>	Amend	<p>Specific to the National Grid, Transpower largely supports the text but as sought in other submission points, seeks further clarification the rules in other chapters (not listed) do not apply. It is noted the text refers to ‘provisions’ which includes objectives, policies and rules and yet this section of text is within the rules section of the chapter. Clarification on what is captured by ‘provisions’ would assist in plan interpretation.</p> <p>Within submission points, Transpower has also sought amendment such that the Historic Heritage rules do not apply (given the specific references (and rules) for Infrastructure within historic heritage sites/areas within the Infrastructure Chapter).</p> <p>Transpower submits the clarification will assist in plan interpretation and application.</p>	<p>Amend the Introduction as follows:</p> <p>Rules</p> <p>The rules of this chapter address the operation, maintenance, repair, removal, upgrading and development of infrastructure undertaken by network utility operators.</p> <p>.....</p> <p>Operating, maintaining, repairing, upgrading, developing and decommissioning of infrastructure is excluded from all provisions <i>(including rules)</i> in area-specific and other district-wide chapter, except for:</p> <p><i>a. Provisions for infrastructure activities which involve additions, alterations, relocation, or demolition of heritage buildings, heritage structures, or contributing buildings in heritage areas (located in the Historical Heritage chapter),</i></p> <p><i>b. Provisions for infrastructure activities which involve trimming or removal of Notable Trees (located in the Notable Trees chapter),</i></p> <p><i>c. Provisions for the removal of indigenous vegetation in the Natural Open Space Zone and residential zones (located in the Ecosystems and Indigenous Biodiversity chapter),</i></p> <p><i>d. Provisions for Noise, including for infrastructure activities (located in the Noise chapter), and</i></p> <p><i>e. Provisions for the Protection of Infrastructure,</i></p>

d. Provisions for Noise, including for infrastructure activities (located in the Noise chapter), and e. Provisions for the Protection of Infrastructure,			
General — operation, maintenance, repair and decommissioning INF-R4 New vehicle access tracks and extensions to existing vehicle access tracks ancillary to infrastructure	Neutral	On the basis the NESETA regulates access tracks associated with existing National Grid assets (and determines the activity status), Transpower is neutral on the rule. However, should the rule apply to the National Grid, Transpower opposes the non complying activity status within ONF, ONL and ONC within the CE.	On the basis the rule does not apply to the National Grid, retain as notified.
General — operation, maintenance, repair and decommissioning INF-R10 New underground structures other than pipelines	Amend	The rule is under the general rules section for operation, maintenance, repair and decommissioning . It is therefore not clear how the rule applies to new underground structures. Clarification would assist with rule interpretation.	Amend the rule to clarify how it applies to new underground structures when it relates to the existing assets.
Electricity transmission INF-R17 Upgrading of transmission lines above 110kV, including associated support structures (not regulated by the NESETA)	Oppose	Transpower opposes INF-R17 as there are no existing National Grid assets within the City that are a) not regulated by the NESETA or b) not subject to a designation. There are also no existing assets within ONC, and ONFL areas. The rule is confusing in its application and interpretation. If the intent of the rule is to manage the upgrading of any new future lines, Transpower submits that this is best addressed as part of the resource consent or designation process. In principle Transpower opposes a non complying activity status in that it does not give effect to the NPSET or the policy direction within INF-P8 (as sought to be amended by Transpower).	Delete Rule INF-R17

Rule #	Rule description	Applicable Standards	Compliance with standards	District-Wide					Outside Coastal Environment		Inside Coastal Environment			
				Where no other columns in this table apply	Active Street Frontage Overlay	Heritage area or site containing heritage building or heritage structure	Category 1 SASM	High Natural Hazard Overlay	Outstanding Natural Feature	Outstanding Natural Landscape	Outstanding Natural Feature	Outstanding Natural Landscape	High and Very High Outstanding Coastal Natural Character Area	Outstanding Coastal Natural Character Area
INF-R17	Upgrading of transmission lines above 110kV, including associated support structures (not regulated by the NESETA)	<ul style="list-style-type: none"> INF-S14 Buildings or structures, other than cabinets or support structures INF-S16 Earthworks — Slope, height, depth and location INF-S17 Earthworks — Area limit, including trenching INF-S18 Earthworks - reinstatement INF-S19 Earthworks — in relation to Sites and Areas of Significance to Māori INF-S20 Removal of indigenous vegetation INF-S21 Upgrading of transmission lines 	Standards complied with	PER	RDIS	RDIS	RDIS	RDIS	RDIS	RDIS			RDIS	
			Standards not complied with								NC	DIS	DIS	NC

Electricity transmission INF-R18 New transmission lines including associated support structures, that convey electricity over 110kV or above (Refer rule below)	Amend	Transpower supports the provision of a specific rule for new National Grid assets but does not support the non complying activity status. The non-complying activity status does not give effect to the NPSET or the policy directive of INF-P8 (as sought to be amended in the Transpower submission). Policy INF-P8 as sought to be amended provides a clear policy directive that	Amend the default activity status to make the default activity status discretionary at worst.
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reconciles the NPSET and NZCPS, and gives effect to the suite of policies in the NPSET.
As a discretionary activity status, a full assessment of effects would be required and consent able to be declined.

Rule #	Rule description	Applicable Standards	Compliance with standards	District-Wide					Outside Coastal Environment		Inside Coastal Environment			
				Where no other columns in this table apply	Active Street Frontage Overlay	Heritage area or site containing heritage building or heritage structure	Category 1 SASM	High Natural Hazard Overlay	Outstanding Natural Feature	Outstanding Natural Landscape	Outstanding Natural Feature	Outstanding Natural Landscape	High and Very High Outstanding Coastal Natural Character Area	Outstanding Coastal Natural Character Area
INF-R18	New transmission lines including associated support structures, that convey electricity over 110kV or above	n/a	Not located in the City Centre Zone	DIS		DIS	DIS	DIS						
			Located in the City Centre Zone	NC	NC	NC	NC	NC	NC	DIS	NC	NC	DIS	NC

Electricity transmission

INF-R19 New substations, transformers, switching stations and ancillary buildings for the National Grid

Amend

Transpower supports the provision of a specific rule for new National Grid assets but does not support the non complying activity status. The non-complying activity status does not give effect to the NPSET or the policy directive of INF-P8 (as sought to be amended in the Transpower submission). Policy INF-P8 as sought to be amended provides a clear policy directive that reconciles the NPSET and NZCPS, and gives effect to the suite of policies in the NPSET.
As a discretionary activity status, a full assessment of effects would be required and consent able to be declined.

Amend the default activity to make the default activity status discretionary at worst.

Rule #	Rule description	Applicable Standards	Compliance with standards	District-Wide					Outside Coastal Environment		Inside Coastal Environment			
				Where no other columns in this table apply	Active Street Frontage Overlay	Heritage area or site containing heritage building or heritage structure	Category 1 SASM	High Natural Hazard Overlay	Outstanding Natural Feature	Outstanding Natural Landscape	Outstanding Natural Feature	Outstanding Natural Landscape	High and Very High Outstanding Coastal Natural Character Area	Outstanding Coastal Natural Character Area
INF-R19	New substations, transformers, switching stations and ancillary buildings for the National Grid	<ul style="list-style-type: none"> INF-S14 Buildings or structures, other than cabinets or support structures INF-S16 Earthworks — Slope, height, depth and location INF-S17 Earthworks — Area limit, including trenching INF-S18 Earthworks - reinstatement INF-S19 Earthworks — in relation to Sites and Areas of Significance to Māori INF-S20 Removal of indigenous vegetation 	Standards complied with	PER										
			Standards not complied with											
				RDIS	RDIS	RDIS	RDIS	RDIS	NC		NC	NC		NC
										DIS			DIS	

Standards – INF-S14, INF-S16, INF-S17, INF-S18, INF-S19 and INF-S20.	Support	The standards will be relevant for activities regulated by INF-R19 within ONLs and High and Very High NC. On the basis of the default activity status, Transpower is supportive of the standards as notified.	Retain standards INF-S14, INF-S16, INF-S17, INF-S18, INF-S19 and INF-S20.
INF-S21 <i>Upgrading of transmission lines not regulated by the NESETA</i> <i>All Zones</i> <i>The upgrade must not include any new or relocated support structures.</i> <i>There are no matters of discretion if the standard is breached.</i>	Oppose	Transpower opposes INF-S21 as there are no existing National Grid assets within the City that are a) not regulated by the NESETA or b) not subject to a designation. The application of the standard (and associated rule) is confusing in its application and interpretation. The standard is also contrary to the NESETA which allows for the relocation and replacement of support structures. It is not clear if the 'new' within the proposed standard allows for replacement structures. If the intent of the standard and associated rule is to manage the upgrading of any new future lines, Transpower submits that this is best addressed as part of the resource consent or designation process.	Delete Standard INF-S21.
Protection of Infrastructure			
PINF – Protection of Infrastructure <i>Adverse effects from land use and development can adversely affect the operation and development of infrastructure and can thereby impact the successful functioning of the city. This includes direct adverse effects from buildings and structures which have potential to obstruct access to infrastructure as well as reverse sensitivity effects, where an activity sensitive to the effects of infrastructure are established nearby, leading to constraints and additional costs for the operation or development of the infrastructure.</i> <i>This chapter includes provisions which are intended to protect the Gas Transmission Network and the National Grid from adverse effects arising from land use and development. Other chapters of the District Plan also play a role in managing adverse effects on infrastructure. In particular:</i> <ul style="list-style-type: none"> <i>The Earthworks chapter, which controls earthworks near gas transmission infrastructure and the National Grid,</i> <i>The Hazardous Substances chapter, which includes provisions to protect gas and petroleum infrastructure,</i> <i>The Noise chapter, which includes provisions to control activities sensitive to noise near state highways and rail corridors, and</i> <i>The Subdivision chapter, which controls subdivision near gas transmission infrastructure and the National Grid.</i> 	Support in part	Transpower supports the provision of a specific chapter to 'protect' infrastructure, and specifically the National Grid. In particular Transpower supports the references and provisions for the National Grid on the basis they give effect to the NPSET, and specifically policies 10 and 11. Notwithstanding the support, an amendment is sought to recognise that any adverse effects on infrastructure (in particular linear infrastructure such as the National Grid) can have effects that extend beyond the city.	Retain the provisions in the General Approach, with a minor amendment as follows: PINF – Protection of Infrastructure <i>Adverse effects from land use and development can adversely affect the operation and development of infrastructure and can thereby impact the successful functioning of the city <u>and beyond</u>. This includes direct adverse effects from buildings and structures which have potential to obstruct access to infrastructure as well as reverse sensitivity effects, where an activity sensitive to the effects of infrastructure are established nearby, leading to constraints and additional costs for the operation or development of the infrastructure.</i>
PINF-O1 Adverse effects on infrastructure <i>The adverse effects of subdivision, use, and development do not compromise the operation and development of infrastructure.</i>	Support	Transpower supports the directive language within the objective, noting the directive to 'do not compromise' gives effect to NPSET Policy 10.	Retain the objective as notified.
PINF-P3 Adverse effects on the National Grid <i>Protect the safe and efficient operation, maintenance and repair, upgrading and development of the National Grid from adverse effects by:</i> <ol style="list-style-type: none"> <i>Avoiding land uses (including Activities sensitive to the National Grid and any increase in their scale and intensity) and buildings and structures within the National Grid Yard that may directly affect or otherwise compromise the National Grid,</i> <i>Avoiding reverse sensitivity effects on the National Grid,</i> 	Amend	Transpower supports the provision of a separate National Grid specific policy to give effect to the NPSET (and specifically Policies 10 and 11). NPSET Policies 10 and 11 are to be read together and reflect the National Grid corridor management approach supported by Transpower throughout NZ. Transpower can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/operators request a Council to	Retain the policy as notified.

<p>3. <i>Maintaining ongoing access to National Grid conductors and support structures for maintenance and upgrading works, and</i></p> <p>4. <i>Achieving compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).</i></p>		<p>impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines. In addition to reverse sensitivity effects, subdivision, land use and development can also compromise the National Grid through activities such as access to the National Grid assets being blocked, buildings and structures being located close to assets and causing risk and safety issues (such as flashovers) or the location of buildings and activities, including 'sensitive activities' such as schools and residential properties, beneath or in close proximity to lines and/or structures can limit Transpower's ability to maintain, upgrade and develop the National Grid.</p> <p>It is noted the policy does not include reference to subdivision or earthworks. On the basis the subdivision and earthwork provisions are contained within the respective chapters (as is provided in the notified PDP), the approach is supported. Based on the above, Transpower supports a specific National Grid policy.</p>	
<p>Rules: <i>This chapter includes provisions for the protection of infrastructure from the adverse effects of land use and development.</i> <i>The rules of this chapter address:</i></p> <ul style="list-style-type: none"> <i>Buildings, structures and activities located within the Gas Transmission Pipeline Corridor, and</i> <i>Buildings, structures and activities located within the National Grid Yard.</i> <p><i>The chapter does not include the following:</i></p> <ul style="list-style-type: none"> <i>Provisions controlling activities sensitive to noise in the Highway and Railway Noise Overlay (located in the Noise chapter),</i> <i>Provisions controlling subdivision within the Gas Transmission Pipeline Corridor (located in the Subdivision chapter),</i> <i>Provisions controlling subdivision within the National Grid Subdivision Corridor (located in the Subdivision chapter),</i> <i>Provisions controlling activities sensitive to hazardous substance risks within the risk management overlay or within 250m of an existing significant hazardous facility (located in the Hazardous Substances chapter. The facilities protected by these provisions include gas and petroleum infrastructure), or</i> <i>Provisions controlling earthworks within the National Grid Yard or within the Gas Transmission Pipeline Corridor (located in the Earthworks chapter).</i> 	Support	<p>Transpower supports the clarification as to the application of the rules within this chapter, as it will assist with plan interpretation and application. In particular Transpower supports the provisions relating to earthworks and subdivision within proximity of the National Grid.</p>	Retain the introductory text to the rules section.
<p>PINF-R3 Activities in the National Grid Yard <i>All Zones:</i> 1. Activity status: Permitted <i>Where:</i></p> <p><i>a. The activity is not one of the following:</i></p> <ol style="list-style-type: none"> <i>Activities sensitive to the National Grid, or</i> <i>The use, handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties, (except this does not apply to the access use and storage of hazardous substances in domestic-scale quantities), or</i> <i>Wintering barns, commercial greenhouses, immovable protective canopies, produce packing facilities, or milking sheds.</i> 	Amend	<p>Transpower supports PINF-R3 on the basis it gives effect to Policy 10 and Policy 11 of the NPSET.</p> <p>The notified provisions in relation to the National Grid Yard (within PINF-R3, PINF-R4 and PINF-S1) are intended to allow for the reasonable use of land inside the defined transmission line corridor, with standards and rules imposed to ensure that any land use and development that might compromise the National Grid is either managed or avoided.</p> <p>Specific to the 12 m 'National Grid Yard', Transpower is satisfied that there are some activities within the National Grid Yard that will not significantly compromise the operation, maintenance or any upgrade of the network, due to their nature and small scale. Certain structures (such as rural hay barns, pump sheds and implement sheds) are less problematic within 12 m of the</p>	<p>Amend the rule as follows:</p> <p>PINF-R3 Activities in the National Grid Yard <i>All Zones:</i> 1. Activity status: Permitted <i>Where:</i></p> <p><i>a. The activity is not one of the following:</i></p> <ol style="list-style-type: none"> <i>Activities sensitive to the National Grid, or</i> <i>The use, handling or storage of hazardous substances (Hazardous Substances (Hazard Classification) Notice 2020) with explosive or flammable intrinsic properties, (except this</i>

<p>2. Activity status: Non-complying Where:</p> <p>a. Compliance is not achieved with PINF-R3.1.</p> <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</p>	<p>line (noting that they will still need to be set back 12 m from National Grid support structures and meet mandatory safety clearances stipulated in other regulations) on the basis they are unlikely to “build out” a transmission line. The access to or use of these structures can be restricted without causing animal welfare or business disruption issues, and they do not introduce intensive uses or heavily frequented workplaces with long durations of exposure to risk. Conversely, examples of development that should be avoided within the National Grid Yard include commercial buildings and intensive uses/development, dairy sheds, piggeries, poultry sheds, and commercial greenhouses, and of specific relevance within the Hutt City context, residential and commercial activities.</p> <p>The location of buildings and activities beneath or in close proximity to lines and/or structures can also compromise Transpower’s ability to maintain, upgrade and develop the National Grid. Additionally, the stability of National Grid lines can be affected by earthworks that destabilise support structures resulting in their need to be relocated.</p> <p>Of particular relevance in terms of the effects of activities on the National Grid are NPSET Policies 10 and 11. These policies act as the primary guide to inform how adverse effects on the National Grid are managed. The policies seek to:</p> <ul style="list-style-type: none"> - Avoid sensitive activities near electricity transmission lines and infrastructure; - Manage other activities to avoid reverse sensitivity effects on the Grid; and - Manage activities to ensure the operation, maintenance, upgrading and development of the Grid is not compromised. <p>The default non complying status is supported. Policy 10 contains the phrase ‘avoid reverse sensitivity effects’ and ‘to ensure that the operation, maintenance, upgrading and development of the electricity transmission network is not compromised’. The use of the words ‘avoid’ and ‘ensure’ provide a strong direction that can only be achieved by way of a non-complying activity status.</p> <p>Notwithstanding the support for the rule, a confined amendment is sought to clarify that changes of land use to a defined ‘activity sensitive to the National Grid’ is a non complying activity.</p>	<p>does not apply to the access use and storage of hazardous substances in domestic-scale quantities), or</p> <p>iii. Wintering barns, commercial greenhouses, immovable protective canopies, produce packing facilities, or milking sheds.</p> <p>2. Activity status: Non-complying Where:</p> <p>a. Compliance is not achieved with PINF-R3.1. b. Any change in land use to an activity sensitive to the National Grid.</p> <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p> <p>Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</p>
<p>PINF-R4 Buildings and structures, including additions and alterations to existing buildings and structures, in the National Grid Yard All Zones:</p> <p>1. Activity status: Permitted Where:</p> <p>a. The building or structure is for one of the following:</p> <ol style="list-style-type: none"> For the purpose of network utility operations or any part of electricity generation that connects to the National Grid, or A non-habitable farm or horticulture structure or building or a stockyard, or A fence, or An accessory building that is associated with an existing residential activity and is less than 10m in area and a maximum height of 2.5m above ground level, or Alterations to an existing building or structure that is used for activities sensitive to the National Grid and which does not increase the building or structure height or footprint, and 	<p>Amend</p> <p>For the reasons outlined in relation to PINF-R3, Transpower supports PINF-R4 on the basis it gives effect to Policy 10 and Policy 11 of the NPSET. Notwithstanding the support for the rule, amendments are sought as follows:</p> <ul style="list-style-type: none"> - To clarify network utilities are as defined in the RMA, and - Provide a clear suite of non-complying activities that will assist in plan interpretation and application and remove any avoidance of doubt. Given the specific nature of the National Grid Yard rules and significance of the National Grid, the clarification is considered beneficial and prudent. 	<p>Amend the rule as follows:</p> <p>PINF-R4 Buildings and structures, including additions and alterations to existing buildings and structures, in the National Grid Yard All Zones:</p> <p>1. Activity status: Permitted Where:</p> <p>a. The building or structure is for one of the following:</p> <ol style="list-style-type: none"> For the purpose of network utility operations (as defined in section 166 of the RMA) or any part of electricity generation that connects to the National Grid, or A non-habitable farm or horticulture structure or building or a stockyard, or

<p>b. Compliance is achieved with PINF-S1: Setbacks and separation distances for buildings and structures located within the National Grid Yard.</p> <p>Note: Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) is mandatory under the Electricity Act 1992. All activities regulated by NZECP34:2001, including buildings, structures, earthworks, and the operation of mobile plant, must comply with that regulation.</p> <p>All Zones:</p> <p>2. Activity status: Non-complying</p> <p>Where:</p> <p>a. Compliance is not achieved with PINF-R4.1</p> <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</p>			<p>iii. A fence, or</p> <p>iv. An accessory building that is associated with an existing residential activity and is less than 10m in area and a maximum height of 2.5m above ground level, or</p> <p>v. Alterations to an existing building or structure that is used for activities sensitive to the National Grid and which does not increase the building or structure height or footprint, and</p> <p>b. Compliance is achieved with PINF-S1: Setbacks and separation distances for buildings and structures located within the National Grid Yard.</p> <p>Note: Compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP34:2001) is mandatory under the Electricity Act 1992. All activities regulated by NZECP34:2001, including buildings, structures, earthworks, and the operation of mobile plant, must comply with that regulation.</p> <p>All Zones:</p> <p>2. Activity status: Non-complying</p> <p>Where:</p> <p>a. Compliance is not achieved with PINF-R4.1; <u>or</u></p> <p>b. <u>Establishing activities sensitive to the National Grid in an existing building or a new building that involves an increase in the building height or footprint, or within a new building; or</u></p> <p>c. <u>Wintering barns, Commercial greenhouses, Immoveable protective canopies, Produce packing facilities, Milking sheds; or</u></p> <p>d. <u>Buildings or structures for the handling or storage of Class 1-4 hazardous substances with explosive or flammable intrinsic properties (except that this does not apply to the accessory use and storage of hazardous substances in domestic scale quantities); or</u></p> <p>e. <u>Any building or structure not otherwise provided for.</u></p> <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.</p>
<p>Standards</p>	<p>Amend</p>	<p>Transpower supports the standards within PINF-S1 on the basis they give effect to Policy 10 and Policy 11 of the NPSET.</p>	<p>Amend the standards within PINF-S1 as follows:</p>

<p>PINF-S1 Setbacks and separation distances for buildings and structures located within the National Grid Yard</p> <ol style="list-style-type: none"> 1. There is no minimum setback for buildings and structures which are part of the National Grid. 2. Fences not exceeding a maximum height of 2.5m above ground level must be setback a minimum 6m from the outer visible edge of a foundation of a National Grid support structure. 3. All other buildings and structures must be setback a minimum 12m from the outer visible edge of a foundation of a National Grid support structure. 4. Buildings and structures must not permanently physically impede vehicular access to a National Grid support structure. 5. All buildings and structures in the National Grid Yard must comply with the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 0114-0663 under all transmission line and building operating conditions. <p>There are no matters of discretion if the standard is breached.</p>		<p>In addition to the health and safety issues of activities locating within proximity of the National Grid, the National Grid can be affected by other activities that establish beneath or in close proximity to its lines and/or structures. Such activities can generate reverse sensitivity effects where landowners/ operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines. Access to support structures can also be compromised, thereby affecting Transpower's ability to operate and maintain the assets as well as respond to any emergency situations.</p> <p>The provisions in relation to the National Grid Yard are intended to allow for the reasonable use of land inside the transmission line corridor, with standards and rules imposed to ensure that any land use and development that might compromise the National Grid is either managed or avoided.</p> <p>Notwithstanding the support for PINF-S1, Transpower seeks a confined amendment to clause 3 to clarify: that network utilities can be located closer than 12m to the support structure, and that any permitted buildings and structures can be located closer than 12m where Transpower has provided its written approval.</p>	<p>Standards</p> <p>PINF-S1 Setbacks and separation distances for buildings and structures located within the National Grid Yard</p> <ol style="list-style-type: none"> 1. There is no minimum setback for buildings and structures which are part of the National Grid. 2. Fences not exceeding a maximum height of 2.5m above ground level must be setback a minimum 6m from the outer visible edge of a foundation of a National Grid support structure. 3. All other buildings and structures must be setback a minimum 12m from the outer visible edge of a foundation of a National Grid support structure., <u>except where it is:</u> <ol style="list-style-type: none"> i. <u>is a network utility or any part of electricity infrastructure that connects to the National Grid; or</u> ii. <u>a building or structure where Transpower has given written approval in accordance with clause 2.4.1 of NZECP34: 2001.</u> 4. Buildings and structures must not permanently physically impede vehicular access to a National Grid support structure. 5. All buildings and structures in the National Grid Yard must comply with the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 0114-0663 under all transmission line and building operating conditions. <p>There are no matters of discretion if the standard is breached.</p>
<p>Earthworks</p>			
<p>Introduction</p> <p>Other relevant chapters of the District Plan</p> <p><i>This chapter includes the core objectives, policies, and rules in relation to earthworks, including earthworks provisions for all zones and overlays, with two exceptions:</i></p> <ol style="list-style-type: none"> 1. The provisions of this chapter do not apply to quarrying activities in the Quarry Zone, and 2. All provisions relating to earthworks for infrastructure are contained in the Infrastructure chapter. However, policies and rules on earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor that are not related to providing for National Grid and Gas Transmission Pipeline are included in this chapter 	Support	<p>Transpower supports the clarification text within the introduction to the Earthworks chapter that clarifies earthworks associated with infrastructure are addressed in the Infrastructure Chapter, and earthworks within the defined National Grid Yard are addressed in this chapter.</p>	<p>Retain the Introductory text as notified.</p>
<p>EW-P1 Minor earthworks</p> <p><i>Enable minor earthworks where:</i></p> <ol style="list-style-type: none"> 1. The stability and structural integrity of land, infrastructure, and buildings are not compromised, 2. Erosion, dust, and sedimentation effects on land and water bodies are minimised, and 3. Effects on visual amenity are insignificant. 	Neutral	<p>Transpower supports the policy in so far as it provides for minor earthworks but subject to matters including the effects on infrastructure. However, specific to the National Grid, in order to ensure the policy is given effect to, Transpower seeks minor earthworks be subject to the National Grid Yard rule EW-R16 and standard EW-S13.</p>	<p>Retain the policy subject to amendment to rule EW-R16 and standard EW-S13.</p>

<p>EW-P2 Appropriate earthworks <i>Enable earthworks associated with subdivision, land use, and development where:</i></p> <ol style="list-style-type: none"> 1. The earthworks are coordinated and integrated with the associated subdivision, land use, and development to ensure the finished landforms are fit for the future intended purpose, including ensuring future land use and development for development sites is feasible, 2. The scale of the earthworks is consistent with the scale and form of development anticipated within the underlying zone, 3. The stability of land is maintained, including the stability of land on adjoining sites, 4. The structural integrity of infrastructure, buildings, and structures on the site and on adjoining sites is not compromised, 5. The area, height or depth, location, and slope of the earthworks ensure that: <ol style="list-style-type: none"> a. Adverse effects on visual amenity resulting from cut or fill faces, retaining structures, and alterations of natural landforms and features are minimised, and b. Effective measures are adopted to manage the potential for erosion and the movement of dust, silt, and sediment beyond the site, 6. The transport of earth and cleanfill material to and from any site is undertaken in a way that: <ol style="list-style-type: none"> a. Minimises adverse effects on amenity values, b. Minimises the deposition of sediment on footpaths, roads, and into stormwater systems, and c. Ensures the safe and efficient operation of the transport network, 7. The area where earthworks have occurred is reinstated to a condition which minimises adverse effects on land stability, erosion, and the visual amenity in a timely manner. 	Support	<p>While not directly relevant to the National Grid given earthworks for infrastructure is addressed in the Infrastructure chapter, and policy EW-P15 <i>Earthworks and vertical holes within the National Grid Yard not associated with infrastructure</i>, Transpower supports the policy and in particular clause 4.</p>	<p>Retain the policy as notified.</p>
<p>EW-P15 Earthworks and vertical holes within the National Grid Yard not associated with infrastructure <i>Only allow earthworks and vertical holes within the National Grid Yard where:</i></p> <ol style="list-style-type: none"> 1. The earthworks are of a scale and nature that will not compromise the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid, or 2. It can be demonstrated that the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid will not be compromised, taking into account: <ol style="list-style-type: none"> a. The extent to which the earthworks and vertical holes may compromise the safe access to and operation, maintenance and repair, upgrading and development of the National Grid, b. The stability of land within and adjacent to the National Grid, c. The risk to the structural integrity of the affected National Grid support structures, d. Risks to health or public safety, including the risk of property damage, and e. Technical advice provided by the owner and operator of the National Grid. 	Amend	<p>Earthworks (and vertical holes) are an activity which can also adversely affect and compromise the National Grid. Specific to the National Grid, earthworks have the potential to undermine transmission line structures, generate dust, reduce the safe clearances between the ground and conductors. They also have the potential to restrict Transpower’s ability to access the line and locate the heavy machinery required to maintain support structures around the lines and may lead to potential tower failure and significant constraints on the operation of the line.</p> <p>On this basis Transpower supports the policy (and specific rule). The only amendments sought are to include:</p> <ul style="list-style-type: none"> • ‘Minor earthworks’ within the policy. <p>Minor earthworks are defined as “earthworks for the purposes of piling, trenching, geotechnical investigations, interments within existing cemeteries or urupā, soakpits, stormwater detention tanks, rainwater tanks, wastewater mitigation tanks, and the replacement or removal of underground petroleum storage systems.” While the activities prescribed in the definition are likely to be of a minor nature, there is no control or limit on the size or scale of the earthworks or proximity to National Grid assets, and therefore they could have an impact. On that basis Transpower supports reference to ‘minor earthworks’ within the policy and associated rule and standard.</p> <ul style="list-style-type: none"> • Delete the reference to <i>not associated with infrastructure</i> from the title as the policy (and associated rule) should apply to infrastructure, noting there is no equivalent policy or rule in the INF Chapter. 	<p>Amend the policy as follows:</p> <p>EW-P15 <u>Minor earthworks</u>, Earthworks and vertical holes within the National Grid Yard not associated with infrastructure</p> <p>Only allow <u>minor earthworks</u>, earthworks and vertical holes within the National Grid Yard where:</p> <ol style="list-style-type: none"> 1. The <u>minor earthworks</u>, earthworks <u>and vertical holes</u> are of a scale and nature that will not compromise the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid, or 2. It can be demonstrated that the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid will not be compromised, taking into account: <ol style="list-style-type: none"> a. The extent to which the <u>minor earthworks</u>, earthworks and vertical holes may compromise the safe access to and operation, maintenance and repair, upgrading and development of the National Grid, b. The stability of land within and adjacent to the National Grid, c. The risk to the structural integrity of the affected National Grid support structures, d. Risks to health or public safety, including the risk of property damage, and

			e. <i>Technical advice provided by the owner and operator of the National Grid.</i>
Rules EW-R1 Minor earthworks Activity status: Permitted	Neutral	Transpower supports the rule in so far as it provides for minor earthworks but seeks minor earthworks be subject to the National Grid Yard rule EW-R16 and standard EW-S13 to ensure they are adequately managed in proximity of National Grid asset.	Retain the rule as notified subject to amendment to rule EW-R16 and standard EW-S13.
EW-R16 Earthworks and vertical holes within the National Grid Yard not associated with infrastructure All zones 1. Activity status: Permitted Where: a. Compliance is achieved with EW-S13: Earthworks and vertical holes within the National Grid Yard not associated with infrastructure. All zones 2. Activity status: Restricted discretionary Where: a. a. Compliance is not achieved with EW-R16.1. Matters of discretion are restricted to: 1. The matters of discretion of any infringed standard. 2. The matters in EW-P15: Earthworks and vertical holes within the National Grid Yard not associated with infrastructure. Notification: Public notification is precluded for applications under this rule. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited.		As outlined in its reasoning on EW-P15, Transpower supports the provision of a specific National Grid Yard rule for earthwork provisions on the basis that earthwork activities are a form of development that can compromise the National Grid (NPSET Policy 10). Earthworks adjacent to support structures can undermine the stability of the structure foundations, causing the structure to lean or, worse, collapse, leading to power outages. Excavations or mounding mid-span can increase risks by reducing the clearance between the ground and conductors. Excavated areas or piles of earthworks can also restrict Transpower’s ability to access and locate the heavy machinery required to maintain support structures and conductors around the lines, including in emergency situations. For these reasons, Transpower seeks controls on earthworks near the National Grid. The provision of a rule framework achieves Policies 2 and 10 of the NPSET in that it protects the integrity of the National Grid and Transpower’s ability to maintain and operate it. Notwithstanding the above support, amendments are sought to the rule as follows: <ul style="list-style-type: none"> - Inclusion of reference to ‘minor earthworks’ as such earthworks can still impact on the National Grid. Should the standards within EW-S13 be complied with, the activity remain a permitted activity. - Amendment to the default activity status from restricted discretionary to non complying. Transpower considers a restricted discretionary activity would be inconsistent with the firm statutory direction in higher order planning instruments. Policy 10 of the NPSET is very directive in requiring that decision makers “must” manage activities to ensure the “operation, maintenance, upgrading and development of the electricity transmission network is not compromised”. Earthworks are an activity that can compromise the National Grid. While the NPSET policy refers to ‘manage’ it is very directive in that the outcome is to ensure the Grid is not compromised. The rule and policy framework is the way in which activities will be managed. This is achieved by a permitted activity rule which allows for a range of activities, but where the standards are not met, a non-complying rule applies. A non-complying activity status also gives effect to the strong directive wording within EW-P15 that directs to ‘only allow’ the activity where the Grid is not compromised. Furthermore, the notified restricted discretionary activity status may result in plan users having unrealistic expectations that consent would be approved. Plans that set unrealistic expectations are not efficient or effective. Conversely, non-complying activity status sends a clear signal that a proposed activity is not anticipated and therefore less likely to be consistent with the Plan and to successfully gain resource consent. It is reasonable for non-complying activity status to apply where an activity cannot meet the permitted activity status. The default non complying 	Amend the rule as follows: EW-R16 <u>Minor earthworks</u> , Earthworks and vertical holes within the National Grid Yard not associated with infrastructure All zones 1. Activity status: Permitted Where: a. Compliance is achieved with EW-S13: <u>Minor earthworks</u> , Earthworks and vertical holes within the National Grid Yard not associated with infrastructure . All zones 2. Activity status: Restricted discretionary <u>Non-complying</u> Where: a. Compliance is not achieved with EW-R16.1. Matters of discretion are restricted to: 1.—The matters of discretion of any infringed standard. 2.—The matters in EW-P15: Minor earthworks, Earthworks and vertical holes within the National Grid Yard not associated with infrastructure. Notification: Public notification is precluded for applications under this rule. Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited.

		<p>activity status is also consistent with the approach currently being sought (and secured) by Transpower across NZ. The standards in EW-S13 align with NZECP34 and while Transpower in some circumstances may/can grant a dispensation from the standards (in relation to depth for example) it cannot grant a dispensation (i.e. approval) for matters such as not meeting the ground to conductor clearance distances.</p> <ul style="list-style-type: none"> - Deletion of the references to <i>not associated with infrastructure</i> from the title as the rule (and associated policy) should apply to infrastructure, noting there is no equivalent policy or rule in the INF Chapter. 	
<p>EW-S13 Earthworks and vertical holes within the National Grid Yard not associated with infrastructure</p> <ol style="list-style-type: none"> 1. The depth of earthworks and vertical holes in the National Grid Yard must be no greater (measured vertically) than: <ol style="list-style-type: none"> a. 300 millimetres within 6 metres of the outer visible edge of a foundation of any National Grid support structure, or b. 3 metres between 6 metres and 12 metres from the outer visible edge of a foundation of any National Grid support structure. 2. Earthworks and vertical holes must not: <ol style="list-style-type: none"> a. Result in a reduction in the ground to conductor clearance distances as required in Table 4 of the {File, 50, New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663. b. Compromise the stability of any National Grid Support Structure. c. Permanently physically impede vehicular access to a National Grid support structure. 3. The following are exempt from this standard: <ol style="list-style-type: none"> a. Earthworks and vertical holes that are undertaken by the operator of the National Grid. b. Earthworks and vertical holes for the repair, sealing or resealing of a footpath, driveway or farm track. c. Vertical holes not exceeding 500 millimetres in diameter that: <ol style="list-style-type: none"> i. Are more than 1.5 metres from the outer edge of the pole support structure or stay wire, or ii. Are a post hole for a farm fence or horticulture structure more than 6 metres from the visible outer edge of a tower or support structure foundation. iii. Earthworks and vertical holes subject to a dispensation from Transpower under {File, 50, New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663. 	Amend	<p>As noted in the reasoning on rule EW-R16, the provision of a rule and standard relating to minor earthworks, earthworks or vertical holes within the National Grid Yard is supported. Notwithstanding the support, amendments are sought as follows:</p> <ul style="list-style-type: none"> - Inclusion of reference to ‘minor earthworks’ as such earthworks can still impact on the National Grid. Should the standards within EW-S13 be complied with, the activity remain a permitted activity. - Amendment to the exemption clauses to reflect NZECP34 does not allow for a dispensation from conductor clearance distance requirements. - Amendment to the exemption clauses to provide an exemption from the access clause where Transpower provides its written approval (as the matter is not addressed in NZECP and therefore the dispensation exemption is not applicable). - Deletion of the references to <i>not associated with infrastructure</i> from the title as the rule (and associated policy) should apply to infrastructure, noting there is no equivalent policy or rule in the INF Chapter. 	<p>Amend the standard as follows:</p> <p>EW-S13 <u>Minor earthworks</u>, Earthworks and vertical holes within the National Grid Yard not associated with infrastructure</p> <ol style="list-style-type: none"> 1. The depth of <u>minor earthworks</u>, earthworks and vertical holes in the National Grid Yard must be no greater (measured vertically) than: <ol style="list-style-type: none"> a. 300 millimetres within 6 metres of the outer visible edge of a foundation of any National Grid support structure, or b. 3 metres between 6 metres and 12 metres from the outer visible edge of a foundation of any National Grid support structure. 2. <u>Minor earthworks</u>, Earthworks and vertical holes must not: <ol style="list-style-type: none"> a. Result in a reduction in the ground to conductor clearance distances as required in Table 4 of the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663. b. Compromise the stability of any National Grid Support Structure. c. Permanently physically impede vehicular access to a National Grid support structure. 3. The following are exempt from <u>1.a., and b., and 2.b. and c. above this standard</u>: <ol style="list-style-type: none"> a. <u>Minor earthworks</u>, Earthworks and vertical holes that are undertaken by the operator of the National Grid, <u>or excluding mining and quarrying, are undertaken by a network utility operator as defined by the Resource Management Act 1991.</u> b. <u>Minor earthworks</u>, Earthworks and vertical holes for the repair, sealing or resealing of a footpath, driveway or farm track. c. <u>Minor earthworks, Earthworks and</u> Vertical holes not exceeding 500 millimetres in diameter that: <ol style="list-style-type: none"> i. Are more than 1.5 metres from the outer edge of the pole support structure or stay wire, or

			<p>ii. Are are a post hole for a farm fence or horticulture structure more than 6 metres from the visible outer edge of a tower or support structure foundation.</p> <p>iii. d. Earthworks and vertical holes <u>Minor earthworks, Earthworks and</u> Vertical holes: <u>i. Subject to a dispensation from Transpower under the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663; or</u></p> <p><u>iv. In relation to rule EW-S13.2.c., written approval is provided by Transpower.</u></p>
Subdivision			
<p>Introduction</p> <p>Insert a sentence clarifying subdivision within the National Grid Subdivision Corridor is addressed in this chapter.</p>	Amend	<p>Transpower supports the Introduction text to the Subdivision Chapter but supports clarification text (similar to that provided within the introduction to the Earthworks chapter) that clarifies subdivision within the defined National Grid Subdivision Chapter is addressed in this chapter.</p>	<p>Amend the Introduction as follows:</p> <p><i>How this chapter works</i></p> <p><i>This chapter includes objectives, policies, and rules that relate to subdivision generally as well as policies and rules that relate to specific types of subdivision and subdivision in specific zones, overlays, and other planning notations.</i></p> <p><i>The general subdivision policies (SUB-P1 to SUB-P9) and rules (SUB-R1 to SUB-R5) apply to all subdivision applications, including those that affect land subject to overlays and other planning notations. The zone-specific and topic-specific policies (SUB-P10 to SUB-P27) and related rules (SUB-R6 to SUB R25) apply to subdivisions of land subject to the applicable overlay. They apply in addition to the general subdivision provisions. <u>Policies and rules relating to subdivision within the National Grid Subdivision Corridor are contained in this chapter.</u></i></p> <p><i>For the avoidance of doubt, subdivision of land subject to an overlay or other planning notation must comply with the relevant general rules as well as the overlay/ planning notation specific rules.</i></p>
<p>SUB-P25 Subdivision of land within the National Grid Subdivision Corridor</p> <p><i>Only allow for subdivision within the National Grid Subdivision Corridor where:</i></p> <ol style="list-style-type: none"> <i>The National Grid will not be compromised, and</i> <i>Any reverse sensitivity effects are avoided and any other adverse effects on and from the National Grid Subdivision Corridor, including public health and safety effects, are avoided, remedied or mitigated, taking into account:</i> <ol style="list-style-type: none"> <i>The impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid including the ability for continued reasonable access to existing transmission assets for maintenance, inspections, and upgrading,</i> 	Amend	<p>Transpower supports the policy.</p> <p>Given the national significance of the National Grid, inappropriate development is a potential issue. In order to manage subdivision that has the potential to compromise the operation, maintenance, upgrading and development of the National Grid, Transpower supports the provision of a corridor management approach which allows for the reasonable use of land inside the transmission line corridor, with several standards and rules imposed to ensure that any subdivision that might compromise the Grid is either avoided or managed. The approach sought by Transpower has been</p>	<p>Amend the policy as follows:</p> <p>SUB-P25 Subdivision of land within the National Grid Subdivision Corridor</p> <p><i>Only allow for subdivision within the National Grid Subdivision Corridor where:</i></p> <ol style="list-style-type: none"> <i>The National Grid will not be compromised, and</i> <i>Any reverse sensitivity effects are avoided and any other adverse effects on and from the National Grid Subdivision Corridor, including public health and safety</i>

<p>b. The ability of any potential future development to comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electrical Safe Distances,</p> <p>c. The extent to which the design and layout of the subdivision demonstrates that suitable building platforms for dwellings can be provided outside of the National Grid Yard for each new lot,</p> <p>d. The risk to the structural integrity of the National Grid Subdivision Corridor, and</p> <p>e. The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from the National Grid and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid assets.</p>		<p>rolled out across New Zealand for the past twelve years as plans have come up for review.</p> <p>Subdivision is considered the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) on potential activities, are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). The provision of a restricted discretionary activity status is consistent with that secured across multiple district plan reviews across New Zealand. Notwithstanding the support, an amendment is sought for the insertion of new clauses relating to consultation with Transpower and consideration of vegetation planting.</p>	<p>effects, are avoided, remedied or mitigated, taking into account:</p> <p>a. The impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid including the ability for continued reasonable access to existing transmission assets for maintenance, inspections, and upgrading,</p> <p>b. The ability of any potential future development to comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electrical Safe Distances,</p> <p>c. The extent to which the design and layout of the subdivision demonstrates that suitable building platforms for dwellings can be provided outside of the National Grid Yard for each new lot,</p> <p>d. The risk to the structural integrity of the National Grid Subdivision Corridor, and</p> <p>e. The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from the National Grid and the potential reverse sensitivity on and amenity and nuisance effects of the National Grid assets.,</p> <p><u>f. The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid; and</u></p> <p><u>g. The outcome of any consultation with, and technical advice from, Transpower.</u></p>
<p>SUB-R24 Subdivision of land within the National Grid Subdivision Corridor Overlay</p> <p>All zones</p> <p>3. Activity status: Restricted discretionary</p> <p>Where:</p> <p>a. All resulting allotments, other than allotments for roads, accessways, or network utilities, can accommodate building platforms for sensitive activities that are located entirely outside of the National Grid Yard, and</p> <p>b. Physical access to any National Grid support structures located on the allotments is maintained.</p> <p>Matters of discretion are restricted to:</p> <p>4. The matters in SUB-P25: Subdivision of land within the National Grid Subdivision Corridor.</p> <p>Notification provisions:</p> <p>Public notification is precluded for applications under this rule.</p> <p>Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited.</p> <p>All zones</p> <p>5. Activity status: Non-complying</p> <p>Where:</p>	<p>Support in part</p>	<p>For the reasons outlined in relation to SUB-P25, Transpower largely supports the rule as notified. In particular, Transpower supports the activity status. Notwithstanding the general support, an amendment is to condition a. to reflect that the need to be able to demonstrate there is a building platform outside the National Grid Yard does not only apply to sensitive activities – it also applies to other non complying activities within the National Grid Yard.</p>	<p>Amend the rule as follows:</p> <p>SUB-R24 Subdivision of land within the National Grid Subdivision Corridor Overlay</p> <p>All zones</p> <p>1. Activity status: Restricted discretionary</p> <p>Where:</p> <p>a. All resulting allotments, other than allotments for roads, accessways, or network utilities, can accommodate building platforms for <u>the principal building or</u> sensitive activities that are located entirely outside of the National Grid Yard, and</p> <p>b. Physical access to any National Grid support structures located on the allotments is maintained.</p> <p>Matters of discretion are restricted to:</p> <p>2. The matters in SUB-P25: Subdivision of land within the National Grid Subdivision Corridor.</p> <p>Notification provisions:</p> <p>Public notification is precluded for applications under this rule.</p>

Compliance is not achieved with SUB-R25.1.			<p>Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited.</p> <p>All zones</p> <p>3. Activity status: Non-complying</p> <p>Where:</p> <p>Compliance is not achieved with SUB-R25.1.</p>
Coastal Environment			
<p>Introduction</p> <p>....</p> <p><i>This chapter contains provisions for the protection of the identified values. The protection of coastal margins and riparian margins within the coastal environment is covered in the Natural Character chapter. Outstanding Natural Features and Landscapes within the coastal environment are addressed in the Natural Features and Landscapes Chapter.</i></p>	Amend	<p>Transpower has no existing assets within the Coastal Environment.</p> <p>The introduction to the Infrastructure (“INF”) Chapter provides the following in relation to relationship between chapters:</p> <p><i>The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant.</i></p> <p>Unlike the Natural Character Chapter which provides a statement on the relevance of other chapters, the Coastal Environment Chapter (CE) provides no definitive statement as to the relationship between chapters in relation to policies and in particular the relationship to the INF Chapter provisions. On this basis it is assumed objectives and policies from both the CE and the INF Chapter apply.</p> <p>While Transpower understands this approach, it submits that this may be potentially confusing to plan users, particularly given the INF Chapter contains specific policies for infrastructure within the CE (including INF-P8 which relates to the upgrading and development of the National Grid within ONL’s and High and very high coastal natural character areas), and there is a corresponding lack of reference to infrastructure activities within the CE Chapter other than in context of the hazard policies (CE-P8 – CE-P13).</p> <p>Transpower’s interpretation is that as the Infrastructure Chapter contains the appropriate policy and rule framework in which to consider infrastructure relating the CE, that chapter is the best placed suite of provisions. On that basis Transpower would support clarification that the Infrastructure Chapter contains the relevant provisions.</p> <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the CE Chapter.</p>	<p>Amend the Introduction to the CE Chapter as follows:</p> <p><u>Other than for the Policies - Coastal Hazards, General Policies, provisions relevant to infrastructure within the coastal environment are contained within the Infrastructure Chapter.</u></p> <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the CE Chapter.</p>
<p>CE-O2 High, Very High and Outstanding Coastal Natural Character Areas</p> <p><i>The identified characteristics and values of High, Very High and Outstanding Coastal Natural Character Areas in the landward extent of the coastal environment are preserved and protected from inappropriate subdivision, use and development.</i></p>	Support	<p>Notwithstanding Transpower’s preference that the Infrastructure Chapter contain the relevant provisions for infrastructure within ONFL’s, Transpower supports the objective in so far as it refers to ‘inappropriate subdivision, use and development’.</p>	<p>Should the policy apply to the National Grid, retain the objective.</p>
<p>CE-P4 Indigenous Vegetation Removal in the Coastal Environment</p> <p><i>The removal of indigenous vegetation in the coastal environment is managed as follows:</i></p>	Amend	<p>Notwithstanding Transpower’s preference (and sought relief) that the INF Chapter contain the relevant provisions for infrastructure within the CE,</p>	<p>Should the policy apply to the National Grid, amend the clause to recognise the National Grid and give effect to the NPSET.</p>

<ol style="list-style-type: none"> 1. <i>Provide for the removal of vegetation within High and Very High Coastal Natural Character Areas where:</i> <ol style="list-style-type: none"> a. <i>It is required to provide for:</i> <ol style="list-style-type: none"> i. <i>Maintenance around existing buildings, or</i> ii. <i>Safe operation of roads, tracks and accessways, or</i> iii. <i>Restoration and conservation activities including pest plant removal and animal pest control activities, or</i> iv. <i>Natural hazard management activities, or</i> v. <i>Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units on rural property, or</i> vi. <i>The placement of beehives; or</i> vii. <i>New farming tracks and fences for existing farming activities, or</i> viii. <i>Mana whenua to exercise customary harvesting practices, or</i> ix. <i>Ongoing maintenance or extension of existing public accessways to improve public access, or</i> b. <i>It is of a scale that maintains the identified values and rehabilitation planting is incorporated where practicable.</i> 2. <i>Only allow for the removal of vegetation within Outstanding Coastal Natural Character Areas where it is required to provide for:</i> <ol style="list-style-type: none"> a. <i>Maintenance around existing buildings, or</i> b. <i>Safe operation of roads, tracks and accessways, or</i> c. <i>Restoration and conservation activities including pest plant removal and animal pest control activities, or</i> d. <i>Natural hazard management activities, or</i> e. <i>Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units on rural property, or</i> f. <i>Mana whenua to exercise customary harvesting practices.</i> g. <i>Ongoing maintenance of existing public accessways.</i> 3. <i>Avoid the removal of vegetation within Outstanding Coastal Natural Character Areas for any other reasons unless:</i> <ol style="list-style-type: none"> a. <i>The removal is of a scale that maintains the identified values, and</i> b. <i>The removal does not result in any adverse effects on the identified values.</i> 		<p>Transpower notes that CE-P4 contains no recognition of infrastructure (or specifically the National Grid) within the policy.</p>	
<p>CE-P6 Use and Development in the Coastal Environment <i>Use and development in the coastal environment are managed as follows:</i></p> <ol style="list-style-type: none"> 1. <i>Provide for use and development in the landward extent of the coastal environment where it:</i> <ol style="list-style-type: none"> a. <i>Consolidates existing urban areas, and</i> b. <i>Does not establish new urban sprawl along the coastline.</i> 2. <i>Only allow use and development in High and Very High Coastal Natural Character Areas in the coastal environment where:</i> <ol style="list-style-type: none"> a. <i>Significant adverse effects on the identified values described in SCHED5 are avoided and any other adverse effects on the identified values described in SCHED5 are avoided, remedied or mitigated, and</i> b. <i>It can be demonstrated that:</i> <ol style="list-style-type: none"> i. <i>The particular values and characteristics of the High or Very High Coastal Natural Character Area as identified in SCHED5 are protected, taking into consideration their vulnerability to change, including the effects of climate change and other natural processes,</i> ii. <i>Any proposed earthworks, building platforms and buildings or structures are of a scale and prominence that respects the identified values and the design and</i> 	Amend	<p>Notwithstanding Transpower's preference (and sought relief) that the Infrastructure Chapter contain the relevant provisions for infrastructure within the CE, Transpower opposes policy CE-P6 on the basis it does not give effect to the NPSET, and specifically Policy 8 of the NPSET which requires a 'seek to avoid' approach for new National Grid assets. As currently drafted, there is no reconciliation with the National Grid specific policy INF-P8, or any other policies in the INF Chapter.</p>	<p>Should the policy apply to the National Grid, amend the clause to recognise the National Grid and give effect to the NPSET.</p>

<p>development integrates with the existing landform and dominant character of the area,</p> <p>iii. The duration and nature of adverse effects are limited,</p> <p>iv. There is a functional or operational need for the activity to locate in the area,</p> <p>v. There are no reasonably practical alternative locations that are outside of the High or Very High Coastal Natural Character Area or are less vulnerable to change, and</p> <p>vi. Restoration or rehabilitation measures, including planting of indigenous species where appropriate, will be incorporated to mitigate any adverse effects.</p> <p>3. Avoid use and development in Outstanding Coastal Natural Character Areas in the coastal environment unless:</p> <p>a. Adverse effects on the identified values described in SCHED5 are avoided, and</p> <p>b. There is a functional or operational need for the activity to locate in the area and there are no reasonably practical alternative locations that are outside of the Outstanding Coastal Natural Character Areas or are less vulnerable to change.</p>			
<p>Rules</p> <p>Note:</p> <ul style="list-style-type: none"> The policies, rules and standards for subdivision within the coastal environment are located in the Subdivision chapter. The policies, rules and standards for earthworks within the coastal environment are located in the Earthworks chapter. The policies, rules and standards for infrastructure within the coastal environment are located in the Infrastructure chapter. The policies, rules and standards for renewable electricity generation within the coastal environment are located in the Renewable Electricity Generation chapter. <p>The landward extent of the coastal environment and areas of high, very high or outstanding natural character within the coastal environment may be subject to additional provisions and overlays, e.g. Outstanding Natural Features and Landscapes (Natural Features and Landscapes chapter) or Natural Character (Natural Character chapter).</p>	Support	Transpower supports the clarity provided that the Infrastructure rules section applies as it provides clarity for plan users and will assist with plan interpretation and application.	Retain the Note to the Rules section, and specifically the direction that <i>The policies, rules and standards for infrastructure within the coastal environment are located in the Infrastructure chapter.</i>
Ecosystems and Indigenous Biodiversity			
<p>Introduction</p> <p><i>The Ecosystems and Indigenous Biodiversity chapter comprises provisions for the management of ecosystems and indigenous biodiversity values.</i></p> <p><i>The objectives, policies, rules and methods set a framework for protecting and restoring native habitats in Lower Hutt.</i></p> <p><i>These provisions apply district-wide, although provisions controlling vegetation removal apply only within the Natural Open Space Zone and residential zones.</i></p> <p><i>In addition to these provisions, Council will seek to work with Mana Whenua and community partners to restore indigenous biodiversity where practicable.</i></p> <p><i>The rules of the chapter apply in conjunction with the rules in zone chapters and other district-wide chapters.</i></p>	Amend	<p>Transpower is neutral on the issue of SNA identification, rather wishes to ensure that any policies and rules give effect to the NPSET and appropriately recognise the need for works to vegetation to ensure the safe and efficient operation, maintenance, upgrade and development of the National Grid.</p> <p>Transpower carries out a range of maintenance activities to ensure efficient operation of the National Grid. Managing the effects of vegetation on the National Grid is a continuous task for Transpower and its Service Providers. Any type of vegetation (indigenous or exotic) growing too close to the National Grid can pose a potential hazard to life, property and the environment, and a threat to the security and reliability of the electricity supply system. Whether this is from inappropriately planted vegetation, or just poorly maintained trees, the risks for the National Grid are significant. Inappropriately planted vegetation and trees growing too close to transmission lines creates risks to the assets, people, stock and other property. The main risks include:</p>	<p>Amend the introduction to the Chapter as follows:</p> <p><i>The Ecosystems and Indigenous Biodiversity chapter comprises provisions for the management of ecosystems and indigenous biodiversity values.</i></p> <p><i>The objectives, policies, rules and methods set a framework for protecting and restoring native habitats in Lower Hutt, <u>acknowledging the need for vegetation related works for some activities.</u></i></p> <p><i>These provisions apply district-wide, although provisions controlling vegetation removal apply only within the Natural Open Space Zone and residential zones.</i></p> <p><i>In addition to these provisions, Council will seek to work with Mana Whenua and community partners to restore indigenous biodiversity where practicable.</i></p> <p><i>The rules of the chapter apply in conjunction with the rules in zone chapters and other district-wide chapters.</i></p>

		<ul style="list-style-type: none"> i. Vegetation causing a flashover resulting in wildfire. Due to the high voltages involved, the flashover can cause the tree to ignite, and under the right conditions cause a wider fire hazard if the tree is near buildings or forests. ii. Vegetation causing loss of supply, either by vegetation being blown into overhead lines, or too close to them, and a flashover occurring. iii. Vegetation causing asset damage, by trees and branches falling into transmission lines causing damage to the conductors, poles and towers. Additional risks of trees striking lines occurs when forestry is felled. Slash can also cause asset damage. iv. Access is restricted and/or made more difficult due to the location of planting or slash. <p>Transpower also has a legal requirement to maintain its lines to minimise any tree-related interruptions to the supply of electricity. The Electricity (Hazards from Trees) Regulations 2003 (“the Tree Regulations”) impose mandatory compliance obligations on Transpower and tree owners to avoid or mitigate hazards from trees on transmission lines. Of note, the Tree Regulations have limitations in that they do not over-ride any district plan rules, or the NESETA. Its application is limited and does not address the full range of risks identified above. The Tree Regulations are also reactive (as opposed to ensuring the ongoing and safe operation of the assets), and require a resource-intensive inspection and management regime.</p> <p>Resource consent requirements for vegetation control, for Transpower’s existing transmission lines, is regulated by the NESETA. Specific to indigenous biodiversity the NESETA regulates the activity status for work to indigenous vegetation. Therefore, the identification of rules relating to indigenous vegetation are relevant to Transpower (as they determine the need for consent under the NESETA).</p>	
ECO-O1 Ecosystems and indigenous biodiversity <i>Indigenous biodiversity in Lower Hutt is maintained, and where practicable, restored or enhanced.</i>	Support	Transpower supports the objective, noting it is very general in nature. The need to maintain vegetation is interpreted as applying at a city wide level as opposed to being on a site specific basis.	Retain the objective as notified.
ECO-P1 Protecting indigenous biodiversity in rural environments <i>Protect indigenous biodiversity in rural environments by controlling the removal of indigenous vegetation in the Natural Open Space Zone</i>	Amend	While Transpower is accepting of the intent of the policy, it does not support the wording ‘protection’ and ‘controlling’ within the policy given the policy applies to indigenous biodiversity generally and is not confined to significant vegetation. Transpower would support alternative wording within the policy to give reflect the ‘manage/maintain’ policy directives within NPS-IB Policy 4, 5, and 8.	Amend the policy as follows: ECO-P1 Protecting <u>Maintaining</u> indigenous biodiversity in rural environments Protect <u>Maintain</u> indigenous biodiversity in rural environments by controlling <u>managing</u> the removal of indigenous vegetation in the Natural Open Space Zone
ECO-P2 Protecting indigenous biodiversity in urban environments <i>Protect indigenous biodiversity in urban environments by controlling the removal of indigenous vegetation in residential zones</i>	Amend	While Transpower accepts the intent of the policy, it does not support the wording ‘protection’ and ‘controlling’ within the policy given the applies to indigenous biodiversity generally and is not confined to significant vegetation. Transpower would support alternative wording within the policy to give reflect the policy directives within NPS-IB Policy 4, 5, and 8.	Amend the policy as follows: ECO-P2 Protecting <u>Maintaining</u> indigenous biodiversity in urban environments Protect <u>Maintain</u> indigenous biodiversity in rural environments by controlling <u>managing</u> the removal of indigenous vegetation in residential zones.

<p>ECO-P3 Indigenous vegetation removal in the Natural Open Space Zone and residential zones Allow the removal of indigenous vegetation in the Natural Open Space Zone and residential zones where it is for:</p> <ol style="list-style-type: none"> 1. Maintenance around existing legally established buildings, 2. The removal of vegetation which was established to provide residential amenity or screening, 3. The removal of trees on Urban Environment Allotments, 4. The protection of people and property from an imminent threat represented by deadwood, diseased or dying vegetation, 5. The control of plant pathogens and diseases, 6. The safe operation and maintenance of roads, tracks and access ways, 7. The reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units, 8. The maintenance, operation, repair and decommissioning of existing infrastructure, and 9. Mana whenua to exercise customary harvesting practices 	Amend	<p>Transpower is not entirely clear as to the purpose of the policy as it largely repeats what is in the rules. However, it is not opposed in principle but seeks amendment to recognise the upgrade to existing infrastructure. Specific to the National Grid, upgrades (in the form of reconductoring or support structure replacement for example) are necessary activities associated with existing National Grid assets and which may require vegetation works to achieve the necessary clearance for access tracks and sufficient clearance distances under lines.</p>	<p>Amend the policy as follows:</p> <p>ECO-P3 Indigenous vegetation removal in the Natural Open Space Zone and residential zones Allow the removal of indigenous vegetation in the Natural Open Space Zone and residential zones where it is for:</p> <p>.....</p> <ol style="list-style-type: none"> 8. The maintenance, operation, repair, <u>upgrade or and</u> decommissioning of existing infrastructure, and 9. Mana whenua to exercise customary harvesting practices
<p>ECO-P4 Managing the adverse effects from indigenous vegetation removal Where resource consent is required for indigenous vegetation removal, manage the adverse effects on ecosystems and indigenous biodiversity values by:</p> <ol style="list-style-type: none"> 1. Managing significant adverse effects in accordance with the following effects management hierarchy: <ol style="list-style-type: none"> a. Avoiding adverse effects where practicable, then b. Where adverse effects cannot be avoided, minimising where practicable, then c. Where adverse cannot be minimised, remedying where practicable, then d. Where more than minor residual adverse effects cannot be avoided, minimised, or remedied, providing biodiversity offsetting where possible, then e. Where biodiversity offsetting of more than minor residual adverse effects is not possible, providing biodiversity compensation, then f. If biodiversity compensation is not appropriate, avoiding the activity itself. 2. Managing all other adverse effects to achieve no overall loss in indigenous biodiversity within Lower Hutt 	Amend	<p>Transpower has concerns that an avoid policy directive (within the EMH) that applies by default to the National Grid, does not give effect to the NPSET, and does not reflect the clear direction that the NPS-IB does not apply to electricity transmission. Transpower does not support the application of the EMH to the National Grid on the basis:</p> <ul style="list-style-type: none"> - The hierarchy is not provided in the NPSET - The NPS-IB provides a specific carve out/exemption for electricity transmission from the NPS-IB - The default avoid directive does not give effect to the NPSET. - The requirements for offsetting and compensation are not required in the NPSET. <p>It is not clear from the Section 32 Report accompanying the plan change variation whether the maintenance of indigenous biodiversity in accordance with Section 30 and 31 of the RMA is an issue within the district that needs to be addressed by the directive rule and policy framework. For example, is indigenous biodiversity (generally) declining? The Section 32 at paragraph 93 notes that of the two ecological districts of land that forms the Lower Hutt territorial area, approximately 20% and 74% of the areas have indigenous vegetation cover. These levels well exceed the 10% targets within clause 3.22 of the NPS-IB.</p> <p>In order to ensure parts of the policy directive do not apply to electricity transmission (the National Grid), a specific exclusion is sought from clauses d., e., and f.</p> <p>While Transpower understands the intent of clause 2., it queries how the policy will be applied at a city wide level.</p>	<p>Amend the policy as follows:</p> <p>ECO-P4 Managing the adverse effects from indigenous vegetation removal Where resource consent is required for indigenous vegetation removal, manage the adverse effects on ecosystems and indigenous biodiversity values by:</p> <ol style="list-style-type: none"> 1. Managing significant adverse effects in accordance with the following effects management hierarchy: <ol style="list-style-type: none"> a. Avoiding adverse effects where practicable, then b. Where adverse effects cannot be avoided, minimising where practicable, then c. Where adverse cannot be minimised, remedying where practicable, then d. Where more than minor residual adverse effects cannot be avoided, minimised, or remedied, providing biodiversity offsetting where possible, then e. Where biodiversity offsetting of more than minor residual adverse effects is not possible, providing biodiversity compensation, then f. If biodiversity compensation is not appropriate, avoiding the activity itself. <p><u>Clauses 1. d., e., and f., do not apply to the National Grid.</u> <u>2. Managing all other adverse effects to achieve no overall loss in indigenous biodiversity within Lower Hutt.</u></p>
<p>ECO-P5 Restoring and increasing indigenous biodiversity Encourage the protection, restoration and maintenance of indigenous biodiversity by:</p> <ol style="list-style-type: none"> 1. Providing for mana whenua to exercise their responsibilities as kaitiaki to protect, restore and maintain areas of indigenous biodiversity, and 2. Supporting initiatives by landowners, community groups and others to protect, restore and maintain areas of indigenous vegetation. 	Support	<p>Transpower supports the ‘encourage’ directive within the policy.</p>	<p>Retain the policy as notified.</p>
<p>ECO-R1 Exotic vegetation removal</p>	Support	<p>Transpower supports the permitted rule for exotic vegetation removal.</p>	<p>Retain rule ECO-R1.</p>

<p>All zones</p> <p>1. Activity status: Permitted</p>		<p>As outlined in the submission point to the introduction, Transpower needs to undertake vegetation works (including to exotic vegetation) in order to ensure security of supply in relation to electricity transmission.</p>	
<p>ECO-R2 Indigenous vegetation removal Commercial and Mixed Use Zones, Industrial Zones, Rural Zones, Sport and Active Recreation Zone, Open Space Zone, Hospital Zone, Tertiary Education Zone, Marae Zone, Quarry Zone, Seaview Marina Zone</p> <p>1. Activity status: Permitted</p> <p>Residential Zones</p> <p>2. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. The activity is the removal of trees on an Urban Environment Allotment, or b. The indigenous vegetation removal is: <ul style="list-style-type: none"> i. Removing vegetation which was planted within a domestic garden for amenity purposes and/or the use of amenity or screening, or ii. Addressing an imminent threat to people or property represented by deadwood, diseased or dying vegetation, or iii. Necessary for the control of plant pathogens and diseases including Myrtle rust, or iv. Within 10 metres of a lawfully established residential unit, or v. Within 5 metres of a lawfully established accessory building with a gross floor area greater than 10m , or vi. To maintain existing open areas, tracks, accessways, fences and onsite services, or vii. To maintain, operate, repair or decommission existing infrastructure, or viii. Required in accordance with sections 43 or 64 of the Fire and Emergency New Zealand Act 2017, or ix. For Customary Harvesting. <p>Natural Open Space Zone</p> <p>3. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. The indigenous vegetation removal is: <ul style="list-style-type: none"> i. Addressing an imminent threat to people or property represented by deadwood, diseased or dying vegetation, or ii. Necessary for the control of plant pathogens and diseases including Myrtle rust, or iii. Necessary to ensure the safe and efficient operation of any formed public road or access, or iv. Within 5m from the external wall of an existing building, or v. Within 3m width either side of an existing fence or other structure, or vi. No more than 5m in total width for maintenance of public access track, where undertaken by central government or local government, or an agent on their behalf, or vii. To maintain existing open areas, tracks, accessways, fences and onsite services, or viii. To maintain, operate, repair or decommission existing infrastructure, or ix. Required in accordance with sections 43 or 64 of the Fire and Emergency New Zealand Act 2017, or x. For Customary Harvesting. <p>Residential Zones, Natural Open Space Zones</p> <p>4. Activity status: Restrict discretionary</p>	<p>Amend</p>	<p>Transpower supports the permitted activity status within ECO-R2.1.</p> <p>Within the residential zones and Natural Open Space zones, Transpower has existing National Grid assets. Vegetation around and underneath the existing assets is required to be trimmed, cleared or modified to ensure the ongoing operation of the existing assets. While Transpower accepts the development of any new National Grid assets would be subject to rules, it seeks a permitted activity status to ensure the operation, maintenance, safety or upgrade of existing National Grid assets. This would reflect the approach in the operative plan for network utilities (in residential zones).</p> <p>Transpower therefore supports insertion of reference to 'upgrade' within the rules to give effect to the NPSET, and specifically policy 2. As an alternative, Transpower would support the 'upgrade' component being confined to the National Grid.</p>	<p>Amend Rule ECO.R2.2 and ECO.R2.3 as follows:</p> <p>2. Activity status: Permitted Where:</p> <ul style="list-style-type: none"> a. The activity is the removal of trees on an Urban Environment Allotment, or b. The indigenous vegetation removal is: <ul style="list-style-type: none"> vii. To maintain, operate, repair, <u>upgrade</u> or decommission existing infrastructure, or <p>3. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. The indigenous vegetation removal is: <ul style="list-style-type: none"> vii. To maintain, operate, repair, <u>upgrade</u> or decommission existing infrastructure, or <p>As an alternative, Transpower would support the upgrade component being confined to the National Grid.</p>

<p>Where:</p> <ul style="list-style-type: none"> a. Compliance is not achieved with ECO-R2.2 or ECO-R2.3. <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The effects on ecosystems and indigenous biodiversity, including with consideration to: <ul style="list-style-type: none"> a. The scale of indigenous vegetation removal, b. The integrity of ecosystems and their sensitivity to disturbance from vegetation removal, and c. The extent to which site rehabilitation is proposed and will be effective in maintaining or enhancing indigenous habitats. 2. The matters in ECO-P4: Managing the adverse effects from indigenous vegetation removal. 3. Positive effects which can only be achieved through non-compliance with ECO-R2.2 or ECO-R2.3, including: <ul style="list-style-type: none"> a. The benefits of infrastructure, b. Improved health and safety, and c. Improved public access and connection to natural environments. <p>Information requirements:</p> <p>Applications for activities which will have more than minor adverse effects on indigenous biodiversity, are required to be supported by a report that:</p> <ol style="list-style-type: none"> i. Is prepared by a suitably qualified ecologist and, as required, any other person with suitable expertise, such as someone with expertise in mātauranga Māori, ii. Includes the detail set in Appendix ECO-App1 — Ecological impact reports, and iii. Is commensurate with the scale and significance (to indigenous biodiversity) of the proposal. 			
<p>Natural Features and Landscapes</p>			
<p><i>The purpose of the Natural Features and Landscapes Chapter is to protect identified Outstanding Natural Features and Landscapes and to manage the effects of subdivision, use and development on the identified values. Outstanding Natural Features and Landscapes and their values are identified within SCHED4 — Outstanding Natural Features and Landscapes. Outstanding Natural Features and Landscapes are exceptional and out of the ordinary and are dominated by natural components over the influence of human activity. The main difference between an Outstanding Natural Feature and an Outstanding Natural Landscape lies in their scale - Outstanding Natural Features are smaller, and the scale of a feature is such that one or more features may be contained within a landscape. The District Plan provisions distinguish between ‘features’ and ‘landscapes’ to protect the identified values at the appropriately scale. The following ONF and ONL have been identified in Hutt City:</i></p> <p><i>1. South Coast (ONL) 2. Turakirae Head (ONF) 3. Baring Head / Ōrua-pouanui (ONF) 4. Parangārahu Lakes (Lake Kohangapiripiri and Lake Kohangatera) (ONF) 5. Matiu / Somes Island (ONL) 6. Mākaro / Ward Island (ONF) 7. Remutaka Range (ONL)</i></p> <p><i>The Outstanding Natural Features and Landscapes Overlay is a district-wide overlay that applies across all zones containing these landscapes and features. The Outstanding Natural Features and Landscapes listed in SCHED4 have been identified using the criteria in Policy 25 of the Greater Wellington Regional Policy Statement. Some of the identified Outstanding Natural Features and Landscapes (or parts thereof) are located in the Coastal Environment and may also have been identified as High, Very High or Outstanding Coastal Natural Character Areas. Where this is the case both the provisions of this chapter and the relevant provisions of the Coastal Environment chapter apply.</i></p>	<p>Amend</p>	<p>The introduction to the Infrastructure (“INF”) Chapter provides the following in relation to relationship between chapters:</p> <p><i>The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant. Unlike the Natural Character Chapter which provides a statement on the relevance of other chapters, the Natural Features and Landscapes Chapter (NFL) provides no statement as to the relationship between chapters in relation to policies. On this basis it is assumed policies from both the NFL and the INF Chapter apply. While Transpower understands this approach, it submits that this may be potentially confusing to plan users, particularly given the INF Chapter contains a specific policy for infrastructure within ONFL’s (including INF-P8 which relates to the upgrading and development of the National Grid within ONFLs), and there is a corresponding lack of reference to infrastructure activities within the NFL Chapter. Transpower’s interpretation is that as the Infrastructure Chapter contains the appropriate policy and rule framework in which to consider infrastructure relating to outstanding features and landscapes, that chapter is the best placed suite of provisions. On that basis Transpower would support clarification that the Infrastructure Chapter contains the relevant provisions.</i></p>	<p>Amend the Introduction to the NFL Chapter as follows:</p> <p><u><i>Provisions relevant to infrastructure within ONFL’s are contained within the Infrastructure Chapter.</i></u></p> <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the NFL Chapter.</p>

<p>NFL-O1 Outstanding Natural Features and Landscapes <i>The landscape values of Outstanding Natural Features and Landscapes are protected from inappropriate subdivision, land use, and development.</i></p>	Support	Notwithstanding Transpower's preference that the Infrastructure Chapter contain the relevant provisions for infrastructure within ONFL's, Transpower supports the objective in so far as it refers to 'inappropriate subdivision, use and development'.	Should the policy apply to the National Grid, retain the objective.
<p>NFL-P4 Indigenous vegetation removal in Outstanding Natural Features and Landscapes <i>The removal of indigenous vegetation in Outstanding Natural Features and Landscapes is managed as follows:</i></p> <ol style="list-style-type: none"> 1. <i>Allow for the removal of indigenous vegetation in Outstanding Natural Features and Landscapes where it is required to provide for:</i> <ol style="list-style-type: none"> a. <i>Maintenance around existing legally established buildings, or</i> b. <i>Safe operation and maintenance of roads, tracks and accessways, or</i> c. <i>Restoration and conservation activities including plant and animal pest control activities, or</i> d. <i>Natural hazard management activities, or</i> e. <i>Reduction of wildfire risk through the removal of highly flammable vegetation near existing residential units, or</i> f. <i>The placement of beehives, or</i> g. <i>New farming tracks and fences for existing farming activities in rural zones, or</i> h. <i>Mana whenua to exercise customary harvesting practices, or</i> i. <i>Ongoing maintenance or extension of existing public accessways to improve public access.</i> 2. <i>Provide for any other removal of indigenous vegetation in Outstanding Natural Features and Landscapes outside the coastal environment where it:</i> <ol style="list-style-type: none"> a. <i>Is of a scale that maintains the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4,</i> b. <i>Recognises and responds to the sensitivity of the environment and its capacity to absorb change without compromising landscape values, and</i> c. <i>Incorporates rehabilitation planting where appropriate and practicable.</i> 3. <i>Only allow for any other removal of indigenous vegetation in Outstanding Natural Features and Landscapes within the coastal environment where:</i> <ol style="list-style-type: none"> a. <i>The removal is of a scale that maintains the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4, and</i> b. <i>The removal does not result in any adverse effects on the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4.</i> 	Amend	Notwithstanding Transpower's preference (and sought relief) that the INF Chapter contain the relevant provisions for infrastructure within ONFL's, Transpower notes that NFL-P4 contains no recognition of infrastructure (or specifically the National Grid) within the policy.	Should the policy apply to the National Grid, amend the clause to recognise the National Grid and give effect to the NPSET.
<p>NFL-P5 Existing use and development in Outstanding Natural Features and Landscapes <i>Provide for existing land use activities and the repair, maintenance and alteration of associated buildings and structures in Outstanding Natural Features and Landscapes where:</i></p> <ol style="list-style-type: none"> 1. <i>They are of a scale and nature that maintains or restores the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4, including landscape restoration and conservation activities, or</i> 2. <i>They are associated with farming activities for an established working farm and maintain the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4, or</i> 3. <i>They are for the maintenance and operation of an existing public track or path and any ancillary structures and are undertaken by central government, local government, or their agents.</i> 	Amend	Notwithstanding Transpower's preference (and sought relief) that the INF Chapter contain the relevant provisions for infrastructure within ONFL's, Transpower notes that NFL-P5 contains no recognition of infrastructure (or specifically the National Grid) within the policy. The policy as notified does not give effect to Policy 2 and 5 of the NPSET which are very directive in terms of recognising and providing for the operation, maintenance and upgrading of existing National Grid assets.	Should the policy apply to the National Grid, amend the clause to recognise the National Grid and give effect to the NPSET.

<p>NFL-P6 New use and development in Outstanding Natural Features and Landscapes <i>New land use activities, buildings and structures (including additions to existing buildings and structures) in Outstanding Natural Features and Landscapes are managed as follows:</i></p> <ol style="list-style-type: none"> 1. <i>Allow for new land use activities, buildings and structures in Outstanding Natural Landscapes outside the coastal environment where they are of a scale and nature that protects the landscape values of the Outstanding Natural Landscape identified in SCHED4.</i> 2. <i>Provide for new land use activities, buildings and structures in Outstanding Natural Landscapes within the coastal environment where any adverse effects on the landscape values of the Outstanding Natural Landscape identified in SCHED4 are avoided.</i> 3. <i>Provide for new land use activities, buildings and structures in Outstanding Natural Features outside the coastal environment where they are of a scale and nature that protects the landscape values of the Outstanding Natural Feature identified in SCHED4.</i> 4. <i>Only allow for new land use activities, buildings and structures in Outstanding Natural Features within the coastal environment where they avoid any adverse effects on the landscape values of the Outstanding Natural Feature identified in SCHED4.</i> 5. <i>Require all new land use activities, buildings and structures in Outstanding Natural Features and Landscapes to demonstrate that they are appropriate by taking into account:</i> <ol style="list-style-type: none"> a. <i>Measures to protect the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4,</i> b. <i>The capacity of the feature or landscape to absorb change,</i> c. <i>The scale of modification and its effect on the landscape values of the Outstanding Natural Feature or Landscape identified in SCHED4,</i> d. <i>Measures to avoid or minimise the removal of indigenous vegetation and to protect the dominant natural components over the influence of human activity, for example, through the clustering of development,</i> e. <i>The extent to which the proposed activity recognises and provides for tangata whenua cultural and spiritual values and practices, and</i> f. <i>Whether there is a functional need or operational need for the building or structure to be located in an Outstanding Natural Feature or Landscape in the Coastal Environment.</i> 	Amend	<p>Notwithstanding Transpower's preference (and sought relief) is that the Infrastructure Chapter contain the relevant provisions for infrastructure within ONFL's, Transpower opposes policy NFL-P6 on the basis it does not give effect to the NPSET, and specifically Policy 8 of the NPSET which requires a 'seek to avoid' approach for new National Grid assets within ONFL's. As currently drafted, there is no reconciliation with the National Grid specific policy INF-P8.</p>	<p>Should the policy apply to the National Grid, amend the clause to recognise the National Grid and give effect to the NPSET.</p>
<p>Rules Notes: <i>Resource consent may be required under rules in this chapter as well as the rules of the relevant zone chapters and other district-wide chapters, including those that apply to overlays.</i> <i>In particular:</i></p> <ul style="list-style-type: none"> • <i>Rules for subdivision within Outstanding Natural Features and Landscapes are in the Subdivision chapter,</i> • <i>Rules for earthworks within Outstanding Natural Features and Landscapes are in the Earthworks chapter,</i> • <i>Rules for infrastructure within Outstanding Natural Features and Landscapes are in the Infrastructure chapter, and</i> • <i>Rules for renewable electricity generation within Outstanding Natural Features and Landscapes are in the Renewable Electricity Generation chapter.</i> <p><i>Unless specifically stated, resource consent is required under each relevant rule. The steps to determine the relevant rules and activity status for an activity are set out in the General Approach chapter.</i></p>	Support	<p>Transpower supports the clarity provided that the Infrastructure rules section applies as it provides clarity for plan users and will assist with plan interpretation and application.</p>	<p>Retain the Note to the Rules section., and in particular the direction <i>Rules for infrastructure within Outstanding Natural Features and Landscapes are in the Infrastructure chapter, and...</i></p>
<p>Natural Character – Coastal Margins and Riparian Margins</p>			

<p>Introduction</p> <p>Other relevant chapters of the District Plan</p> <p><i>This chapter contains the main objectives, policies and rules that relate to natural character of coastal margins and riparian margins. Other district-wide chapters also play a role in preserving the natural character of coastal margins and riparian margins and protecting them from inappropriate subdivision, use and development. In particular:</i></p> <ul style="list-style-type: none"> • The Subdivision chapter, • The Earthworks chapter, • The Infrastructure chapter, • The Renewable Electricity Generation chapter, and • The Natural Hazards chapter. 	Amend	<p>The introduction to the Infrastructure (“INF”) Chapter provides the following in relation to relationship between chapters:</p> <p><i>The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant.</i></p> <p>The NATC Chapter provides “<i>This chapter contains the main objectives, policies and rules that relate to natural character of coastal margins and riparian margins.</i>”, with reference then made to other chapters that also are relevant, including the Infrastructure (“INF”) Chapter</p> <p>While Transpower understands this approach, it submits that this may be potentially confusing to plan users, particularly given the INF Chapter contains a specific policy for infrastructure within NATC (including INF-P8 which relates to the upgrading and development of the National Grid within NATC), and there is a corresponding lack of reference to infrastructure activities within the NATC Chapter.</p> <p>Transpower’s interpretation is that as the INF Chapter contains the appropriate policy and rule framework in which to consider infrastructure relating to natural character, that chapter is the best placed suite of provisions. On that basis Transpower would support clarification that the Infrastructure Chapter contains the relevant provisions.</p> <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the NATC Chapter, in order to give effect to the NPSET.</p>	<p>Amend the Introduction to the Natural Character Chapter as follows:</p> <p>Other relevant chapters of the District Plan</p> <p><i>This chapter contains the main objectives, policies and rules that relate to natural character of coastal margins and riparian margins, <u>noting that provisions relevant to infrastructure relating to natural character of coastal margins and riparian margins are contained within the Infrastructure Chapter.</u></i></p> <p><i>Other district-wide chapters also play a role in preserving the natural character of coastal margins and riparian margins and protecting them from inappropriate subdivision, use and development. In particular:</i></p> <ul style="list-style-type: none"> • The Subdivision chapter, • The Earthworks chapter, • The Infrastructure chapter, • The Renewable Electricity Generation chapter, and • The Natural Hazards chapter. <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the NATC Chapter.</p>
<p>NATC-O1 Natural character of coastal margins and riparian margins</p> <p><i>The natural character of coastal margins and riparian margins is preserved and protected from inappropriate subdivision, use and development, and enhanced.</i></p>	Support	<p>Notwithstanding Transpower’s preference that the INF Chapter contain the relevant provisions for infrastructure within Coastal Margins and Riparian Margins, Transpower supports the objective in so far as it refers to ‘inappropriate subdivision, use and development.</p>	<p>Should the policy apply to the National Grid, retain the objective.</p>
<p>NATC-P3 Indigenous vegetation removal within coastal margins and riparian margins</p> <p><i>Provide for the removal of indigenous vegetation within coastal margins and riparian margins where:</i></p> <ol style="list-style-type: none"> 1. <i>The removal of indigenous vegetation is of a scale that maintains the natural character of the coastal margin or riparian margin and rehabilitation planting is incorporated where practicable, or</i> 2. <i>The removal of indigenous vegetation is required for:</i> <ol style="list-style-type: none"> a. <i>Maintenance around existing buildings, or</i> b. <i>The safe operation of roads, tracks and accessways, or</i> c. <i>Conservation activities including pest plant removal and animal pest control, or</i> d. <i>Natural hazard management, or</i> e. <i>The reduction of risk from wildfires through the removal of highly flammable vegetation near existing residential units on rural property, or</i> f. <i>Mana Whenua to exercise their customary harvesting practices, or</i> g. <i>Improving public access through the ongoing maintenance or extension of existing public accessways.</i> 	Amend	<p>Notwithstanding Transpower’s preference (and sought relief) is that the Infrastructure Chapter contain the relevant provisions for infrastructure within Coastal Margins and Riparian Margins, Transpower notes that NATC-P3 contains no recognition of infrastructure (or specifically the National Grid) within Clause 2 of the policy.</p>	<p>Should the policy apply to the National Grid, amend clause 2 to recognise infrastructure.</p>

<p>NATC-P4 Appropriate use and development within coastal margins and riparian margins Provide for the use and development of land within coastal margins and riparian margins where:</p> <ol style="list-style-type: none"> 1. The use and development is of a scale, form, and nature that does not detract from the natural character of the coastal margin or riparian margin, or 2. The use and development: <ol style="list-style-type: none"> a. Has a functional need or operational need to be located within the coastal margin or riparian margin and no alternative locations are practicable, and b. Has been designed and located to minimise adverse effects on the natural character of coastal margins and riparian margins. 	Amend	Notwithstanding Transpower's preference (and sought relief) is that the Infrastructure Chapter contain the relevant provisions for infrastructure within Coastal Margins and Riparian Margins, Transpower supports NATC-P4 in so far as it recognises 'operational need'. However, as currently drafted, there is no reconciliation with the 'seek to avoid' directive within the National Grid specific policy INF-P8, and the policy does not give effect to the NPSET.	Should the policy apply to the National Grid, amend the clause to recognise the National Grid and give effect to the NPSET.
<p>NATC-P5 Inappropriate use and development within coastal margins and riparian margins Avoid all other use and development of land within coastal margins and riparian margins not provided for through NATC-P1, NATC-P2, NATC-P3, and NATC-P4, unless:</p> <ol style="list-style-type: none"> 1. The use and development: <ol style="list-style-type: none"> a. Will not have any adverse effects on the natural character and amenity values of the coast, water bodies, and their margins, or 2. The use and development: <ol style="list-style-type: none"> a. Has a functional need or operational need to be located within the coastal margin or riparian margin and no alternative locations are practicable, and b. Has been designed and located to minimise adverse effects on the natural character of coastal margins and riparian margins. 	Amend	Notwithstanding Transpower's preference (and sought relief) is that the Infrastructure Chapter contain the relevant provisions for infrastructure within ONFL's, Transpower does not have a fixed position on NATC-P5 but notes that clause 2 mirrors that within policy NATC-P4 and therefore repeats the policy framework for activities that are 'appropriate' within NATC-P4.	Should the policy apply to the National Grid, review the policy to confirm the appropriateness of clause 2.
<p>Rules Notes: Resource consent may be required under the rules in this chapter, the rules of the relevant zone chapters, and the rules of other district-wide chapters. This includes rules that apply to overlays, such as the rules in the Coastal Environment chapter and the Natural Features and Landscapes chapter. In particular:</p> <ul style="list-style-type: none"> • Rules for subdivision within coastal margins and riparian margins are in the Subdivision chapter, • Rules for earthworks within coastal margins and riparian margins are in the Earthworks chapter, • Rules for infrastructure within coastal margins and riparian margins are in the Infrastructure chapter, and • Rules for renewable electricity generation within coastal and riparian margins are in the Renewable Electricity Generation chapter. <p>Unless specifically stated, resource consent is required under each relevant rule. The steps to determine the relevant rules and activity status for an activity are set out in the General Approach chapter.</p>	Support	Transpower supports the clarity provided that the Infrastructure rules section applies, as it provides clarity for plan users and will assist with plan interpretation and application.	Retain the Note to the Rules section and in particular the directive <i>Rules for infrastructure within coastal margins and riparian margins are in the Infrastructure chapter, and...</i>
Papakāinga			
<p>Introduction ... The provision of the District-Wide chapters, including chapters that apply provisions to sites within overlays, still apply.</p>	Support	Transpower supports the clear directive that the District Wide Chapter (which includes the National Grid provisions within the PINF Chapter) apply to Papakāinga. The application of the National Grid corridor provisions gives effect to policies 10 and 11 of the NPSET.	Retain the Introductory text to the Papakāinga Chapter.

<p>Rules</p> <p>Notes:</p> <p><i>There are no rules in this chapter. The objectives and policies are implemented through rules in other chapters of the Plan, particularly the rules of the Residential Zones, Rural Zone, Commercial and Mixed Use Zone and Marae Zone chapters.</i></p> <p><i>Unless stated otherwise, the rules of the relevant District-Wide chapters also apply to papakāinga, including chapters that apply to overlays on the District Plan maps.</i></p>	Support	Transpower supports the clear directive that the District Wide Chapter (which includes the National Grid provisions within the PINF Chapter) apply to Papakāinga. The application of the National Grid corridor provisions gives effect to policies 10 and 11 of the NPSET.	Retain the Rules ‘note’ within the Papakāinga Chapter.
Natural Hazards			
Whole Chapter	Amend	<p>Existing National Grid assets are located within a number of hazards identified in the PDP.</p> <p>Policies and rules relating to existing and new infrastructure within hazards areas are contained in the Infrastructure Chapter. Transpower supports that approach as it provides the appropriate wider framework in which to consider the activities. On that basis, Transpower understands the rules within the Natural Hazards Chapter do not apply (other than for Green infrastructure and flood mitigation works, and hard engineering coastal hazard mitigation works). However, the policies within the Natural Hazards Chapter may apply (based on the wording within the Infrastructure Chapter which states in the section on relationship with other chapters”however objectives and policies in other chapters may be relevant”.</p> <p>On the basis the Infrastructure Chapter provides a more appropriate policy framework in which to consider the National Grid, Transpower would support clarification within the Natural Hazards Chapter that it only applies to Green infrastructure and flood mitigation works, and hard engineering coastal hazard mitigation works.</p> <p>Should the Natural Hazards Chapter apply to the National Grid, Transpower would support specific recognition within the policies (and rules if any apply) to the broader ‘technical and operational constraints’ associated with infrastructure within natural hazard areas. It also needs to be made clear that it is not the requirement of infrastructure to reduce the risk to others, rather that the infrastructure does not in itself cause or increase the risk. This distinction is important.</p>	<p>Amend the Introduction to the Natural Hazards Chapter as follows:</p> <p><u><i>Other than for Green infrastructure and flood mitigation works, and Hard engineering coastal hazard mitigation works, provisions relevant to infrastructure within hazard areas are contained within the Infrastructure Chapter.</i></u></p> <p>Should the Natural Hazards Chapter apply to the National Grid, amend the Natural Hazard Chapter policies (and rules if any apply) to recognise the broader ‘technical and operational constraints’ associated with infrastructure within natural hazard areas, and clarify that it is not the requirement of infrastructure to reduce the risk to others, rather that the infrastructure does not in itself cause or increase the risk</p>
Sites and Areas of Significance to Māori			
<p>Introduction</p> <p>....</p> <p><i>While this chapter includes the core objectives, policies and rules that apply to sites and areas of significance to Māori, other chapters of the District Plan include specific rules that also apply to sites and areas of significance to Māori, including Infrastructure, Subdivision, Earthworks, Temporary Activities and Zones. As such, this chapter should be read alongside other relevant chapters of the District Plan.</i></p>	Amend	As identified, there are existing National Grid assets within the Sites of Significance to Māori (“SASM’s”) at Ngutu-ihe Pā and Te Ngohengohe SASM (Category 2) at the Gracefield substation.	<p>Amend the Introduction to the SASM Chapter as follows:</p> <p><u><i>Provisions relevant to infrastructure within SASM’s are contained within the Infrastructure Chapter.</i></u></p> <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the SASM Chapter.</p>



at Pa Parihoro SASM (Category 3)



and at Maraenuku Pā SASM (Category 2) at the Melling Substation.



SASM’s will also be relevant to any new National Grid assets.

The introduction to the Infrastructure (“INF”) Chapter provides the following in relation to relationship between chapters:

The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant.

The SASM Chapter provides ” *While this chapter includes the core objectives, policies and rules that apply to sites and areas of significance to Māori, other chapters of the District Plan include specific rules that also apply to sites and areas of significance to Māori, including Infrastructure, Subdivision, Earthworks, Temporary Activities and Zones. As such, this chapter should be read alongside other relevant chapters of the District Plan.*”

While Transpower understands this approach, it submits that this may be potentially confusing to plan users, particularly given the INF Chapter contains a specific policy for infrastructure within SASM’s and there is a corresponding lack of reference to infrastructure activities within the SASM Chapter.

Transpower’s interpretation is that as the Infrastructure Chapter contains the appropriate policy and rule framework in which to consider infrastructure relating to SASM’s, that chapter is the best placed suite of provisions. On that basis Transpower would support clarification that the Infrastructure Chapter contains the relevant provisions.

Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the SASM Chapter.

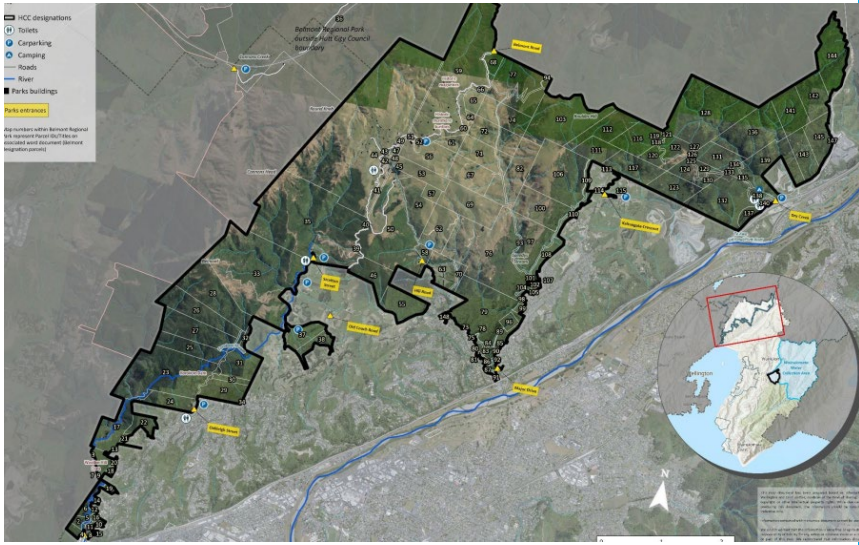
<p>SASM-O1 Te Mana o Ngā Wāhi (Recognition, protection and maintenance) <i>Sites and areas of significance to Māori and their associated values are recognised, protected and maintained.</i></p>	Support	<p>Transpower supports the objective as notified, noting the INF Chapter contains a specific policy (INF-P13) for infrastructure within SASM sites. Transpower supports the identification of SASMs within the PDP (within Schedule 6).</p>	<p>Should the policy apply to the National Grid, retain the objective.</p>
<p>Rules Notes: <i>Resource consent may be required under rules in this chapter as well as other chapters. Unless specific stated, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.</i></p>	Amend	<p>Transpower has concerns the introductory text within the Rules section of the SASM Chapter and within the Infrastructure Chapter potentially confusing and lacks clarity. While the SASM Chapter says other rules will apply, the text within the Rules section of the Infrastructure Chapter explicitly states: <i>Operating, maintaining, repairing, upgrading, developing and decommissioning of infrastructure is excluded from all provisions in area-specific and other district-wide chapter, except for:</i> <i>a. Provisions for infrastructure activities which involve additions, alterations, relocation, or demolition of heritage buildings, heritage structures, or contributing buildings in heritage areas (located in the Historical Heritage chapter),</i> <i>b. Provisions for infrastructure activities which involve trimming or removal of Notable Trees (located in the Notable Trees chapter),</i> <i>c. Provisions for the removal of indigenous vegetation in the Natural Open Space Zone and residential zones (located in the Ecosystems and Indigenous Biodiversity chapter),</i> <i>d. Provisions for Noise, including for infrastructure activities (located in the Noise chapter), and</i> <i>e. Provisions for the Protection of Infrastructure, including from other infrastructure activities (located in the Protection of Infrastructure chapter).</i> There is no reference to SASM's and on this basis Transpower's interpretation is that the rules of the SASM Chapter do not apply. However this is not clear given the wording within the SASM Chapter. Given the specific references to Infrastructure within SASM's within the Infrastructure Chapter, Transpower supports explicit recognition that the SASM rules do not apply to infrastructure.</p>	<p>Amend the wording within the Rules section as follows:</p> <p>Rules Notes: <i><u>Apart from Infrastructure which is addressed in the Infrastructure Chapter, Resource consent may be required under rules in this chapter as well as other chapters. Unless specific stated, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.</u></i></p>
<p>Historic Heritage</p>			
<p>Introduction <i>Historic heritage provides a connection to the past and an understanding and appreciation of history and culture. Historic heritage can include buildings, structures, items, sites or areas that evoke or are associated with historical or cultural significance.</i> <i>The protection of significant historic heritage against inappropriate subdivision, use and development is a matter of national importance under the Resource Management Act. The Council is required to recognise and provide for the protection of historic heritage against inappropriate activities that may adversely affect the significant values associated with historic heritage within the District Plan.</i> <i>Along with protecting significant historic heritage, there is also a need to provide for continued use, appropriate adaptive reuse and safety alterations (including earthquake strengthening, fire safety and accessibility) to provide for ongoing economic viability, continued usability and the safety of people.</i> <i>This chapter sets out the objectives, policies and rules that work to protect significant historic heritage values associated with identified buildings, structures, items and areas with significant historic heritage values.</i></p>	Amend	<p>The introduction to the Infrastructure ("INF") Chapter provides the following in relation to relationship between chapters: <i>The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant.</i> Unlike the Natural Character Chapter which provides a statement on the relevance of other chapters, there is no reference to historic heritage in the above and no introductory text within the HH chapter as to the relationship between chapters. On this basis it is assumed policies from both the HH and the INF Chapter apply. While Transpower understands this approach, it submits that this may be potentially confusing to plan users, particularly given the INF Chapter contains a specific policy for infrastructure within historic heritage, and there</p>	<p>Amend the Introduction to the Historic Heritage Chapter as follows:</p> <p><i><u>Provisions relevant to infrastructure within historic heritage areas, building and structure are contained within the Infrastructure Chapter.</u></i></p> <p>Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the HH Chapter.</p>

.....		is a corresponding lack of reference to infrastructure activities within the HH Chapter. Transpower's interpretation is that as the Infrastructure Chapter contains the appropriate policy and rule framework in which to consider infrastructure relating to HH, that chapter is the best placed suite of provisions. On that basis Transpower would support clarification that the Infrastructure Chapter contains the relevant provisions. Should clarification not be provided, Transpower seeks appropriate recognition of the National Grid within the HH Chapter.	
HH-O1 Historic heritage values are recognised and protected <i>Significant historic heritage values associated with buildings, structures and areas are recognised and protected from inappropriate subdivision, use, and development.</i>	Support	Notwithstanding Transpower's preference that the INF Chapter contain the relevant provisions for infrastructure within historic heritage, Transpower supports the objective in so far as it refers to 'inappropriate subdivision, use and development.	Should the policy apply to the National Grid, retain the objective.
HH-P11 Total demolition of heritage buildings and heritage structures <i>Avoid total demolition of heritage buildings and heritage structures unless:</i> <i>a. The heritage building or heritage structure poses an immediate threat to life, or</i> <i>b. It is demonstrated that there are no reasonably practicable alternatives to total demolition, and:</i> <i>i. Total demolition is necessary to provide for the functional or operational needs of infrastructure, or</i> <i>ii. Total demolition is necessary to provide for the purpose of the Zone that the heritage building or heritage structure is located in.</i>	Support	Notwithstanding Transpower's preference that the Infrastructure Chapter contain the relevant provisions for infrastructure within historic heritage, Transpower supports the policy as it recognises the operational needs of infrastructure.	Notwithstanding Transpower's preference (and sought relief) is that the Infrastructure Chapter contain the relevant provisions for infrastructure within HH, Transpower supports retention of the policy.
Rules Note: <i>The rules of this chapter apply to works that relate to buildings and structures identified in SCHED1 - Heritage Buildings and Structures and buildings and structures located in areas listed in SCHED2 - Heritage Areas.</i> <i>Resource consent may be required under rules in this chapter as well as other chapters. Unless specifically stated, resource consent is required under each relevant rule. The steps to determine the relevant rules and activity status for an activity are set out in the General Approach chapter.</i>	Amend	The introduction to the Infrastructure Chapter provides the following in relation to relationship between chapters: <i>The Infrastructure chapter includes provisions for operating, maintaining, repairing, developing, upgrading and decommissioning infrastructure. These infrastructure activities are excluded from most rules in other chapters of the District Plan (details on which other rules apply to infrastructure are given at the beginning of the rules section of this chapter), however objectives and policies in other chapters may be relevant. The Infrastructure chapter does not include provisions which address the following:</i> <ul style="list-style-type: none"> • <i>Green infrastructure and flood mitigation works (Natural Hazards chapter),</i> • <i>Hard engineering coastal hazard mitigation works (Coastal Hazards chapter),</i> • <i>Vehicle crossings (Transport chapter),</i> • <i>Subdivision which creates allotments for infrastructure purposes (Subdivision chapter), and</i> • <i>Protection of infrastructure from adverse effects of land use and development, including:</i> <ul style="list-style-type: none"> - <i>Protection of gas transmission infrastructure and the National Grid from activities and buildings and structures</i> <i>(Protection of Infrastructure chapter),</i> - <i>Earthworks within the National Grid Yard (Earthworks chapter),</i> - <i>Subdivision within the Gas Transmission Pipeline Corridor and the National Grid Subdivision Corridor (Subdivision chapter), and</i> - <i>Activities sensitive to noise within the Highway and Railway Noise Overlay (Noise chapter).</i> <p>..... Rules</p>	Amend the wording within the Rules section as follows: Rules Notes: <i><u>Apart from Infrastructure which is addressed in the Infrastructure Chapter, Resource consent may be required under rules in this chapter as well as other chapters. Unless specific stated, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.</u></i>

		<p><i>Operating, maintaining, repairing, upgrading, developing and decommissioning of infrastructure is excluded from all provisions in area-specific and other district-wide chapter, except for:</i></p> <p><i>a. Provisions for infrastructure activities which involve additions, alterations, relocation, or demolition of heritage buildings, heritage structures, or contributing buildings in heritage areas (located in the Historical Heritage chapter),</i></p> <p>.....</p> <p>Transpower is not clear for the reasoning and rationale of having the rules in both chapters apply. Given the specific references (and rules) for Infrastructure within historic heritage sites/areas within the Infrastructure Chapter, Transpower supports explicit recognition that the HH rules do not apply to infrastructure.</p>	
Financial Contributions			
<p>Introduction</p> <p><i>A financial contribution may also be required when an applicant proposes to off-set or provide compensation for any adverse effects generated by the development or activity.</i></p>	Amend	<p>Notwithstanding Transpower supports text within the introduction that uses terms such as ‘may’ and ‘proposes’, it has concerns how offsetting and compensation would be calculated and when they would be applied. It noted that references to offsetting and compensation within the PDP are made in context of Biodiversity, and not in relation to wider effects.</p> <p>Transpower submits that the concepts are best addressed in the Indigenous Biodiversity Chapter. If they are to be retained in the FC Chapter, clarification is required as to what effects they would be applied too.</p>	<p>Delete the introductory text as follows:</p> <p><i>A financial contribution may also be required when an applicant proposes off-set or provide compensation for any adverse effects generated by the development or activity.</i></p>
<p>FC-O1 Financial contributions</p> <p><i>Subdivision, use and development contributes equitably towards the costs of upgrading or providing services, reserves, and infrastructure, as well as avoiding, remedying, mitigating, offsetting, and compensating for any adverse environmental effects.</i></p>	Amend	<p>Transpower is not opposed in principle to the objective but has concerns in what circumstances offsetting and compensation would be required. Within the current context of the PDP, this occurs only in relation to biodiversity. Transpower would have concerns should the requirement be widened in term of its application to the National Grid, and how would be calculated. The reference to ‘any adverse environmental effects’ is also of concern. For example, how would a council calculate the level of offsetting or compensation in relation to landscape values.</p> <p>It is noted there is no corresponding policy framework within the chapter to give effect to the objective.</p>	<p>Delete the references to offsetting and compensation; or</p> <p>Amend the objective (or provide an explicit policy) to clarify in what circumstances offsetting and compensation would be required or be appropriate.</p>
<p>FC-R2 Any land use activity</p> <p><i>All zones</i></p> <p><i>Any land use activity:</i></p> <p>1. Activity status: Permitted</p> <p><i>Where:</i></p> <p><i>a. A financial contribution is provided in compliance with:</i></p> <p><i>i. FC-S1: Purpose of financial contributions,</i></p> <p><i>ii. FC-S2: Nature and timing of financial contributions,</i></p> <p><i>iii. FC-S3: Amount of financial contributions — Reserves, and</i></p> <p><i>iv. FC-S4: Amount of financial contributions — Services and infrastructure, and offsetting and compensation.</i></p> <p><i>No financial contribution is required for the following:</i></p>	Amend	<p>A financial contribution differs from offsetting and compensation. Transpower has significant concerns with the open nature of the rule and implications for the National Grid. Transpower has concerns how the contribution would be calculated.</p> <p>While the reference in clause iii. <i>FC-S4: Amount of financial contributions — Services and infrastructure, and offsetting and compensation</i> refers to offsetting and contributions, there is no actual provision in the standard itself S4 as to how to calculate the level of offsetting and contribution.</p> <p>Furthermore, while table FC-Table 1 refers to the reason for the contribution being “<i>The amount of money or land or both needed to offset or compensate for any adverse environmental effects that cannot otherwise be avoided, remedies or mitigated</i>”, there are no matters of consideration to determine the amount or nature of the contribution.</p>	<p>Either delete the references to offsetting and compensation within FC-R2, FC-S4 and Tale FC-Table 2, or amend the exemptions within FC-R2 to include an exemption for the National Grid.</p>

<ol style="list-style-type: none"> 1. Non-residential activity for which a building consent is required and that either is less than \$20,000 exclusive of GST in value or has a GFA of less than 10m, unless the building consent is for a change of use. 2. In relation to any residential unit, the replacement, development, repair or renovation work generates no additional demand for reserves or infrastructure. 3. Where a contribution for the same purpose has already been made at the time of subdivision creating that lot. 4. Except for a financial contribution for reserves, where a development contribution has been paid under the relevant Development Contribution Policy for planned infrastructure projects that includes a special assessment under the Development Contribution Policy for unplanned infrastructure projects. 5. Where a development agreement between the applicant and Council provides that no financial contribution is required. <p>FC-S4 Amount of financial contributions – Services and infrastructure, and offsetting and compensation</p> <p>All zones</p> <ol style="list-style-type: none"> 1. The amount of contribution shall be up to 100% of the actual or estimated costs, or land necessary to provide for the “Reasons for Financial Contribution” specified in FC-Table 1. 2. The estimated or actual cost of financial contributions, whether provided or constructed by the Council or otherwise shall be calculated in accordance with the matters for consideration set out in FC-Table 1. 3. The amount of financial contribution shall include any associated costs including but not limited to: <ol style="list-style-type: none"> a. The reimbursement of legal costs incurred by Council in providing easements, encumbrances, covenants and the like. b. The reimbursement of fees charged to Council by Government departments, local authorities and the suppliers of public utilities and infrastructure. c. Survey work. d. Any fees incurred by an adjoining local authority or network operator in processing the application. e. Goods and Services Tax (GST). 			
FC-Table 1 — Financial Contribution Amount for Services and Infrastructure			
Planning Maps			
District Plan maps generally	Support	<p>The National Grid is identified by two features on the planning maps, as follows:</p> <ul style="list-style-type: none"> - National Grid Yard (Informational) - National Grid Subdivision Corridor (Informational) <p>Transpower supports the mapping of the National Grid, acknowledging the mapping is ‘Informational’ only. However it has the following concerns (which are depicted in the screenshot below):</p> <ul style="list-style-type: none"> - The mapping layer is very hard to distinguish and hard to detect when the zone layer is removed. Only the National Grid Yard layer is detectable when the map is viewed with the aerial basemap provided. 	<p>Retain the mapping of the National Grid on the planning maps but amend as follows:</p> <ul style="list-style-type: none"> - Mapping of the centreline only; - That that the Grid be identified as 'National Grid lines' on the planning maps; and - The map layer be coloured so it is easier to detect and identify.

		<div>- While only informational, Transpower has concerns with the spatial identification of the Yard and Corridor setbacks on the maps as the aerial mapping cannot always be relied upon and the spatial extent as identified does not reflect the centreline.</div> <div></div> <div>To address the above concerns, Transpower supports the mapping of the centreline only on the planning maps, and that the Grid be identified as 'National Grid lines' on the planning maps. This would also give effect to the National Planning Standards.</div>	
Part 3: Area Specific Matters			
Designations: Transpower New Zealand Ltd			
Electricity Substation (Haywards) Designation unique identifier - TPR-01 Designation purpose - Electricity Substation Site identifier - Legal description: Section 1 SO 34496 Physical address: 7 Kaitawa Street, Haywards Site name: Electricity Substation Lapse date – Given effect to Designation hierarchy under section 177 of the Resource Management Act – Primary	Support	Transpower supports the rollover the designation and its identification in the planning maps.	Retain the designation as notified

Conditions – None Additional information – Rollover designation, formerly designation TPNZ1			
Electricity Substation (Melling) Designation unique identifier – TPR-02 Designation purpose – Electricity substation Site identifier – Legal description: Part Section 37 Hutt District Physical description: 71 Connolly Street, Boulcott Site name: Electricity Substation (Melling) Lapse date – Given effect to Designation hierarchy under section 177 of the Resource Management Act – Primary Conditions – No Additional information – Rollover designation, formerly TPNZ2	Support	Transpower supports the rollover the designation and its identification in the planning maps.	Retain the designation as notified
Electricity Substation (Gracefield) Designation unique identifier – TP3-03 Designation purpose – Electricity Substation Site identifier – Legal description: Lots 21, 22, 23, 24, 25, 26 and 27 DP 8231 Physical address: 138-150 Gracefield Road, Gracefield Site name: Electricity Substation (Gracefield)	Support	Transpower supports the rollover the designation and its identification in the planning maps.	Retain the designation as notified
<div>Part 3: Area Specific Matters</div> <div>Designations: Greater Wellington Regional Council</div>			
Belmont Regional Park Designation unique identifier WRC-12 Designation purpose Regional Park purposes – recreation, conservation, protection, general park management, rural activities and any other activities permitted in the operative reserve management plan , including but not limited to the development, operation, construction, upgrade , maintenance and repair of parks assets and public spaces . Site identifier Lapse date Designation hierarchy under section 177 of the Resource Management Act Varies Conditions Yes - Proposed conditions for Belmont Regional Park designation Additional information Subject of notice of requirement for a new designation	Oppose	<div>Transpower understands the NOR relates to the area of Belmont Regional Park within Hutt City. Refer image below provided in the NOR.</div> <div></div> <div>There are existing National Grid assets within the Park – refer image below.</div>	Transpower seeks clarification as to how the NOR will give effect to the NPSET, and specifically how the National Grid Yard and National Grid Subdivision Corridor will be applied. One option may be to include a condition to the designation requiring compliance with the National Grid corridor provisions. The references could be updated upon subsequent plan reviews.



Page 21 of the NOR states *“Infrastructure specifically related to the national grid where it passes through Belmont Regional Park is also excluded from the NOR (demonstrated by the national grid corridor and yards on HCC’s maps).”* It is not clear how the existing Grid assets are excluded from the NOR given the extent shown on the map provided in the NOR and on the PDP planning maps. It is assumed that while not clear, the statement in the NOR means that any new National Grid assets are excluded from the NOR.

Despite the existing National Grid assets in the Park, the NOR provides no reference or assessment against the NPSET.

Transpower has three issues in relation to the NOR and its relationship to the National Grid, as follows:

1. The NESETA provides the regulatory framework for existing National Grid assets. In accordance with Section 43D(4) of the RMA, the NESETA prevails (as it came into force before the NOR/designation). As such works associated with the existing National Grid assets will continue to be regulated by the NESETA and will not be subject to the designation.
2. New National Grid assets would require approval from GWRC as the Requiring Authority. Any new National Grid assets would not necessarily be consistent with the purpose of the NOR and Transpower has concerns that given the large extent and area of the NOR, it would have implications for the development of the National Grid.
3. The NOR provides for a wide range of activities and would apply over the National Grid Corridor and in effect, nullify the requirement for the regional council to comply with the National Grid corridor provisions. This would have potential implications for the ongoing operation, maintenance and upgrade of the National Grid and would not give effect to the NPSET, in particular NPSET policies 10 and 11. As noted in the NOR *“Although many of these activities and Belmont Regional Park itself could be provided for in the District Plan via permitted activity rules and standards, the proposed overlays in the Draft District Plan are considered to be*

		<p><i>too restrictive and unduly limit the standard park management activities able to be undertaken within Belmont Regional Park. Therefore, the designation will provide efficiencies to both GW and HCC in terms of consenting and compliance for activities undertaken in accordance with the designation purpose.”</i> While Transpower is cognisant of the desire for efficiencies, the NOR provides no consideration or conditions to manage effects of activities on the National Grid.</p> <p>Transpower has no record of any correspondence or consultation, and given the concerns outlined above, opposes the NOR in so far as it has not been sufficiently demonstrated to give effect to the NPSET.</p>	
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