

19 November 2021

Proposed Porirua District Plan Hearings Panel
Porirua City Council
PO Box 50218
Porirua 5240

Attention: District Plan Review Hearings Administrator

Via email: dpreview@porirua.govt.nz

HEARINGS ON THE PROPOSED PORIRUA DISTRICT PLAN – HEARING STREAM 3

SUBMITTER REFERENCE: TRANSPOWER NEW ZEALAND LIMITED 60

Transpower New Zealand Limited (“Transpower”) writes in relation to Hearing Stream 3, scheduled to commence on 3 December 2021.

There are a limited number of submission points of relevance to Transpower that are being considered as part of Hearing Stream 3 and, where relevant, Transpower generally agrees with the recommendations given in the Section 42A Report for this topic. On that basis, Transpower has not requested to be heard or filed evidence. That said, Transpower is available to respond to any questions the Hearings Panel may have.

For completeness Transpower records its position in respect of the relevant matters in the table at **Attachment 1**.

Transpower respectfully requests that this letter be tabled for the Panel’s consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

Should you require clarification of any matter, please contact Liam Bullen at Dentons Kensington Swan (04 915 0799), or on the following email: Liam.Bullen@dentons.com.

Yours faithfully



Rebecca Eng
Senior Environmental Planner

Attachment 1: Transpower's response to S42A report recommendations

Sub Ref	Hearing	PDP Reference	Relief Sought in Transpower's Submission	S42A Report Recommendation	Transpower's Response to S42A Report Recommendations
60.27	3	REE – Resilience, Efficiency and Energy	<p>Retain REE-O4</p> <p>Supports recognition of the effects of climate change.</p>	<p>Recommendation: Accept in part, subject to amendments made in response to other submitters.</p> <p>S42A reference: Part B Strategic Directions Historic and Cultural Heritage and Resilience, Efficiency and Energy: Section 3.5 and Appendix B.</p> <p>Amend REE-O4 as set out below and in Appendix A; <i>REE-O4 Adapting to climate change</i> <i>Porirua City is prepared to adapt to the effects of climate change and recognises the opportunities and risks associated with those effects are recognised in decision making.</i></p>	<p>Transpower accepts the recommendation.</p> <p>While amended, the retention of REE-O4 is supported as it recognises the effects of climate change and the need to adapt to it.</p>
60.68	3	HH - Historic Heritage	<p>Retain the Historic Heritage Chapter. If the chapter applies to the National Grid, amend provisions to reflect the relief sought in submission.</p> <p>Neutral on the provisions within the chapter on the basis the provisions within the Historic Heritage chapter do not apply to infrastructure, and specifically the National Grid. If the provisions apply, seek relief consistent with the relief sought in its submission.</p>	<p>Recommendation: Accept in part s42A reference: Part B – Historic Heritage, paragraphs [45] & [49]</p> <p>Reasoning: <i>The provisions in the HH – Historic Heritage Chapter do not apply to infrastructure. ...</i></p> <p><i>Accordingly, I agree with Transpower to retain this approach and I consider there is no need to address their alternative relief.</i></p> <p><i>I recommend for the reasons given in the assessment that the submission from Transpower [60.68], be accepted in part.</i></p>	<p>Transpower accepts the recommendation.</p> <p>The reporting officer has confirmed the provisions in the Historic Heritage Chapter do not apply to infrastructure.</p> <p>Ask that the Panel specifically confirms this position in its decision.</p>

Sub Ref	Hearing	PDP Reference	Relief Sought in Transpower's Submission	S42A Report Recommendation	Transpower's Response to S42A Report Recommendations
60.69	3	SASM - Sites and Areas of Significance to Maori	Retain the chapter. If the chapter applies to the National Grid, amend provisions to reflect the relief sought in submission.	Recommendation: Accept in part s42A reference: Part B – Sites and Areas of significance to Māori, paragraphs [45] and [48] Reasoning: <i>The provisions in the SASM– Sites and Areas of Significance to Māori Chapter do not apply to infrastructure. ... Accordingly, I agree with Transpower to retain this approach and I consider there is no need to address their alternative relief.</i>	Transpower accepts the recommendation and asks that the Panel specifically confirms this position in its decision. The reporting officer has confirmed the provisions in the Sites and Areas of Significance to Māori Chapter do not apply to infrastructure.
60.2	3	CE – Coastal Environment	Retain Definition - Coastal High Natural Character Area On the basis the district plan is to contain provisions relating to High Natural Character, Transpower supports the identification of such areas on the basis it assists plan users and provides clarity on the application of the PDP provisions that relate to the definition.	Recommendation: Accept S42A reference: Part B – Coastal Environment, Appendix B, page 10.	Transpower accepts the recommendation. The retention of this definition is supported as it assists plan users and provides clarity.
60.87	3	CE – Coastal Environment	Retain the Coastal Environment Chapter. If the chapter applies to the National Grid, amend provisions to reflect the relief sought in submission. Neutral on the provisions within the chapter on the basis the provisions within the Coastal Environment chapter do not apply to infrastructure, and specifically the National Grid. If the provisions apply, seek relief consistent with the relief sought in its submission.	Recommendation: Accept in part , subject to amendment made in response to other submissions. Nb the s 42A report does not expressly confirm that the coastal chapter does not apply but appears to proceed on that basis. S42A reference: Part B – Coastal Environment, Appendix B, page 1.	Transpower accepts the recommendation on the basis that the Coastal Environment Chapter does not apply to the National Grid and asks that the Panel confirms this. Transpower respectfully requests that it be advised if this is not the case.
60.88	3	CE – Coastal Environment	Retain CE-P1 Support the identification of Coastal High Natural Character Areas on the basis they assist plan users and provides clarity on the application of the PDP provisions	Recommendation: Accept S42A reference: Part B – Coastal Environment, Appendix B, page 11. Reasoning: <i>agree with submitter</i>	Transpower accepts the recommendation. The retention of this policy is supported as it assists

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			that apply, particularly in context of the directive policy framework.		plan users and provides clarity.
60.89	3	CE – Coastal Environment	<p>Retain CE-R19.</p> <p>If the rule applies to the National Grid, amend provision to reflect the relief sought in submission and provide a discretionary activity status for the planning and development of the National Grid.</p> <p>Neutral on Rule CE-R19 on the basis the provisions within the Coastal Environment chapter do not apply to infrastructure, and specifically the National Grid. Oppose a non-complying activity status applying to the National Grid if the rule applies.</p>	<p>Recommendation: Accept in part - subject to amendments made in response to other submissions</p> <p>S42A reference: Part B – Coastal Environment, Section 3.19 and Appendix B, page 17.</p> <p>Reasoning:</p> <p>a. Amend CE-R19 as outlined in Appendix A.</p> <p>CE-R19 Any activity <u>within a Coastal High Natural Character Area or coastal hazard overlay</u> not otherwise listed as permitted, controlled, restricted discretionary, discretionary or noncomplying.</p> <p>All zones 1. Activity status: Non-complying <u>Discretionary</u></p>	<p>Transpower accepts the recommendation, on the basis that the Coastal Environment Chapter does not apply to the National Grid and asks that the Panel confirms this. Transpower respectfully requests that it be advised if this is not the case.</p>
60.67	3	NH - Natural Hazards	<p>Retain the Natural Hazards Chapter.</p> <p>If the chapter applies to the National Grid, amend provisions to reflect the relief sought in submission.</p> <p>[Refer to original submission and specific submission points for full decision requested]</p> <p>Neutral on the provisions within the chapter on the basis the provisions within the Natural Hazards chapter do not apply to infrastructure, and specifically the National Grid. If the provisions apply, seek relief consistent with the relief sought in its submission.</p>	<p>Recommendation: Accept in part, subject to amendments made in response to other submissions.</p> <p>S42A reference: Part B – Natural Hazards, Appendix B, page 1.</p>	<p>Transpower accepts the recommendation on the basis that the Natural Hazards Chapter does not apply to the National Grid and asks that the Panel confirms this. Transpower respectfully requests that it be advised if this is not the case.</p>