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Keeping the energy flowing

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For the Attention of the Independent Hearing Panel on the Proposed Porirua District Plan – Variation 1 Proposed District Plan Hearing Stream 7

Transpower New Zealand Limited (“Transpower”) writes in relation to Hearing Stream 7, commencing on 13 March 2023, on Variation 1 to the Proposed Porirua City District Plan.

Transpower’s main interest in Variation 1 is ensuring that the planning framework recognises and provides for the National Grid, including that it gives effect to the National Policy Statement on Electricity Transmission 2008 (“NPSET”) through identification of the National Grid as a qualifying matter and the determination of the National Grid provisions within the PDP, as heard through earlier hearing streams on the PDP.

Transpower’s submission on Variation 1 was largely in support. In particular Transpower supports:

- The identification of the National Grid within the IPI as a qualifying matter, and
- Inclusion of the PDP National Grid Corridor provisions within the IPI and ISPP process.

The amendments sought through the submission are confined in nature and include:

- Amendment to the explanatory text with the RESZ chapter;
- Amendment to RESZ-P1;
- Inclusion of an advisory note to MRZ-R1;
- Inclusion of a definition of ‘qualifying matter area’; and
- Inclusion of the National Grid Subdivision Corridor rule in the IPI.

Transpower has considered the Section 42A Report on its submission points and largely agrees or supports the officer recommendations. While Transpower’s preference remains for the provision of a specific definition of ‘Qualifying Matter area’ (submission point reference OS53.8) within the context of the Porirua PDP and given inclusion of the National Grid corridor provisions as ‘Qualifying matters’, Transpower accepts the officer recommendation.

For completeness, attached is a table outlining the individual submission points and Transpower’s response to the recommendations.

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 the Panel

require clarification on any matter, please contact Daniel Hamilton at Transpower (03 590 6926), or on the following email: environment.policy@transpower.co.nz.

Yours faithfully

A handwritten signature in black ink, appearing to read "Daniel Hamilton". The signature is written in a cursive, flowing style with some loops and flourishes.

Daniel Hamilton

Environmental Regulatory Team Leader, Transpower New Zealand Limited

Sub Ref	Provision	Position	Decision Requested	Reasons	S42A Response	Transpower Response to S42A Recommendation
60.97	GRZ-P9	Support	Retain	Supported	<p>Reject S42A: Part B – Residential Zones, Planning Maps and General Topics Para 363. “Since the GRZ-General Residential Zone has been deleted I do not consider that submissions made on the rules and standards can be considered to have been carried across to either the MRZ-Medium Density Residential Zone and HRZ-High Density Residential Zone. These apply to different spatial areas than the GRZ-General Residential Zone and have different planned urban built environments. The PDP no longer anticipates a GRZ-General Residential Zone.”</p>	Accept recommendation on the basis the GRZ zone is deleted and replaced with the MRZ and HRZ.
OS53.1	General / General	Amend	<p>The amendments sought through the submission are confined in nature and include:</p> <ul style="list-style-type: none"> • Amendment to the explanatory text with the RESZ chapter • Amendment to RESZ-P1 • Inclusion of an advisory note to MRZ-R1 • Inclusion of a definition of ‘qualifying matter area’; and • Inclusion of the National Grid Subdivision Corridor rule in the IPI. 	<p>Largely supports the proposed IPI. In particular:</p> <ul style="list-style-type: none"> • The identification of the National Grid within the IPI as a qualifying matter, and • Inclusion of the PDP National Grid Corridor provisions within the IPI and ISPP process. 	<p>Accept in part Agree with Submitter No specific commentary in S42A Report</p>	Noting the general nature of the submission point, accept the recommendation on the basis of recommendations on other submission points.

OS53.2	General/Qualifying Matters	Not stated	Refer to original submission for full decision requested]	<p>Sections 77I and 77O of the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 (“the RMA”) provides a specified territorial authority may make the MDRS and the relevant building height or density requirements under Policy 3 less enabling of development in relation to a qualifying matter. A qualifying matter is defined by section 77I and 77O of the RMA.</p> <p>The National Grid Corridor rules framework clearly meets the definition of a qualifying matter. Submission includes an assessment (as required by section 77K(1)) to support the incorporation of the National Grid Corridors as an existing qualifying matter in the IPI. (Refer to original submission for full reason, including attachment).</p>	<p>Accept S42A: Part B – Overarching report Paras 679 – 682 “I note that I have assessed the submission point from Transpower [OS53.11] on SUB-R15 in the Section 42A Officer’s Report: Part B – District-Wide In that report I noted that the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation states: <i>where a rule or standard is proposing to amend or modify the MDRS, or the height or density of urban form requirements set out in policy 3, is it applied as a qualifying matter for the purposes of sections 77I and 77O.</i> 681. The relevant rule in the PDP applied as qualifying matters are listed in Table 1 in the Section 32 Evaluation. That table includes MRZ-R17 and SUB-R15. As such, the consideration of Transpower that the National Grid as being a qualifying matter is consistent with the approach taken under Variation 1</p>	Noting the general nature of the submission point, accept the recommendation on the basis of recommendations on other submission points.
OS53.3	General /General	Not stated	[Refer to original submission for full decision requested]	All submission points and hearing evidence of Transpower to the PDP stand. These include the objectives, policies and rules relating to the National Grid.	<p>Accept S42A: Part B – Overarching report Paras 683 “On the submission from Transpower [OS53.3], I note that the submissions from Transpower on the PDP were considered in Hearing Stream 4, with the points relating to the National Grid analysed in section 3.6 of my Section 42A Report: Part B - Infrastructure. Those will be considered by the Hearing Panel along with all other PDP submissions heard in earlier hearing streams. There is no need to comment any further on those submission points here.”</p>	Support the recommendation which confirms all matters from Hearing Stream 4 will be carried over into deliberations on Hearing Stream 7.

OS53.4	General Approach/ District Plan framework/ Part 2 District-Wide Matters	Support	Retain the text that refers to 'qualifying matters'.	Transpower supports the introductory text and reference to qualifying matters as it assists in plan interpretation and gives effect to the RMA.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation to retain the text which refers to qualifying matters. Reflects relief sought in the submission.
OS53.5	General Approach/ How the District Plan works/ Qualifying matters	Support	Retain the reference to qualifying matters and the accompanying explanation as to how and when they apply.	Transpower supports the introductory text and reference to qualifying matters as it assists in plan interpretation and gives effect to the RMA.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation to retain the text which refers to qualifying matters. Reflects relief sought in the submission.
OS53.6	General Approach/ How the District Plan works / Legal effect of rules	Support	Retain the introductory text relating to legal effect and qualifying matters.	Transpower supports the explanatory text relating to legal effect and the application of qualifying matters. The text assists with plan interpretation and application.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation to retain the text which refers to qualifying matters. Reflects relief sought in the submission.
OS53.7	Definitions /Qualifying matter	Support	Retain the definition of qualifying matter	Transpower supports the definition of 'qualifying matter' as it highlights to plan users the existence of the matters. The definition reflects that provided within the RMA.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation to retain the definition of qualifying matter. Reflects relief sought in the submission.
OS53.8	Definitions / New Definition	Amend	Insert a definition for QUALIFYING MATTER AREA as follows: <u><i>Qualifying matter area means a qualifying matter listed below:</i></u>	The concept of Qualifying matters was introduced within the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 ("the RMA"). As outlined in Appendix C to this submission, as defined by section 77I and 77O of the RMA, the National Grid Corridor framework is considered a qualifying matter as:	Reject S42A: Part B – Overarching report Paras 460 "The terms 'qualifying matter area' and 'rapid transit stop' are not used in the PDP, and therefore	While Transpower would prefer the insertion of a definition, it accepts the recommendation on the basis a

			<p>(a) <u>The National Grid Yard</u></p> <p>(b) <u>The National Grid Subdivision Corridor</u></p> <p>..... (other qualifying matters to be listed)</p>	<ul style="list-style-type: none"> it is a matter required to give effect to the NPSET being a national policy statement (other than the NPS-UD); and it is a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure. <p>Given the role and importance of qualifying matter areas to the implementation of the RMA, while Transpower supports the definition of ‘qualifying matter’ within Variation 1, Transpower submits it would be of further benefit to plan users to provide a clear list as to what are qualifying matter areas in the PDP, and specifically, provide explicit reference to the National Grid Yard and National Grid Subdivision Corridor as a qualifying matter area.</p> <p>To differentiate between the RMA provided definition of ‘qualifying matter’, a definition of ‘qualifying matter area’ is proposed.</p>	<p>I consider that they do not need to be defined. Further, both the HRZ and MRZ list relevant qualifying matters in their respective introductions to assist plan users.”</p>	<p>definition of Qualifying matter is provided which clearly includes the National Grid.</p>
OS53.9	UFD - Urban Form and Development/ Strategic objectives/ UFD-07	Support	Retain Strategic Objective UFD-07	Transpower supports the strategic objective, and in particular the recognition of wellbeing and health and safety.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation to retain the strategic direction. Reflects relief sought in the submission.
OS53.10	UB - Subdivision /Rules / SUB - R4 Subdivision of land around existing lawfully established buildings / Residential zones 1. Activity	Support	Subject to the relief sought in its submission to the PDP on rule SUB-R15 and its inclusion in the IPI, Transpower seeks the retention of rule SUB-R4.	On the basis rule SUB-R15 (which is specific to the National Grid Subdivision Corridor) is retained in the PDP (subject to amendments as sought in the Transpower submission to the PDP) and inserted into the IPI, Transpower supports SUB-R4.	Reject S42A: Part B – District Wide Matters Paras 180 - 182 “In relation to the submission from Transpower, Transpower’s submission on the PDP was considered through previous hearing streams. In relation to whether SUB-R15 is a qualifying matter, I note that the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation states: <i>where a rule or standard is proposing to amend or modify the MDRS, or the height or density of urban form requirements set out in policy 3, is it applied as a qualifying matter for the purposes of sections 77I and 77O.</i>	Support recommendation on the clarification provided that a restricted discretionary activity status applies for subdivision within the National Grid Subdivision Corridor. While the wording in the S32 is arguably not clear,

	status: Controlled				181. The relevant rules in the PDP applied as qualifying matters are listed in Table 1 in the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation. That table includes SUB-R15. As such, I consider that the outcome sought by the submitter is already achieved, and it is clear that a restricted discretionary activity status applies to subdivision within the National Grid Subdivision Corridor. While I have not recommended any amendments to SUB-R4, I note that Transpower's submission on that rule was subject to its submission on SUB-R15 being accepted. "	the clarity provided in the S42A Report is supported.
OS53.11	B - Subdivision / Rules /SUB-R15	Amend	Transpower seeks the inclusion of rule SUB-R15 in the IPI (subject to the relief sought in its submission to the PDP on rule SUB-R15).	<p>In its submission to the PDP, Transpower submitted in support of rule SUB-R15 (and specifically the activity status) on the basis the rule gives effect to Policies 10 and 11 of the NPSET. Amendments were sought to the rule, but its overall basis was supported.</p> <p>Given:</p> <ul style="list-style-type: none"> • 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) are avoided; • The National Grid Subdivision Corridor is referenced in the s32 as a qualifying matter; • Section 77I RMA allows a TA to make the MDRS (which includes subdivision) less enabling of development where necessary to accommodate a QM; and • Section 80E(1)(b)(iii) RMA provides an IPI may amend the MDRS, including in relation to the subdivision of land (s88(2)(g)); <p>Transpower seeks the inclusion of the subdivision rule within the IPI so as to clarify a restricted discretionary activity status applies for subdivision within the National Grid Subdivision Corridor.</p>	<p>Reject</p> <p>S42A: Part B – District Wide Matters Paras 180 - 182 "In relation to the submission from Transpower, Transpower's submission on the PDP was considered through previous hearing streams. In relation to whether SUB-R15 is a qualifying matter, I note that the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation states: <i>where a rule or standard is proposing to amend or modify the MDRS, or the height or density of urban form requirements set out in policy 3, is it applied as a qualifying matter for the purposes of sections 77I and 77O.</i></p> <p>181. The relevant rules in the PDP applied as qualifying matters are listed in Table 1 in the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation. That table includes SUB-R15. As such, I consider that the outcome sought by the submitter is already achieved, and it is clear that a restricted discretionary activity status applies to subdivision within the National Grid Subdivision Corridor. While I have not</p>	Support recommendation on the clarification provided that a restricted discretionary activity status applies for subdivision within the National Grid Subdivision Corridor. While the wording in the S32 is arguably not clear, the clarity provided in the S42A Report is supported.

					recommended any amendments to SUB-R4, I note that Transpower’s submission on that rule was subject to its submission on SUB-R15 being accepted. “	
OS53.12	RESZ - General Objectives and Policies for all Residential Zones / General	Amend	<p>Amend RESZ as follows (with sought additions shown as red text):</p> <p>RESZ - General Objectives and Policies for all Residential Zones Introduction</p> <p>.....</p> <p><u>There are parts of the Residential Zones where the permitted development, height or density directed by the NPS-UD may be modified and/or limited by qualifying matters and qualifying matter areas.</u></p> <p><i>There are also areas that have lower height limits for buildings and structures because of their slope aspect or topographical constraints. In these areas, additional control is necessary to mitigate the adverse effects of</i></p> <p>https://www.msn.com/en-nz/feedtaller buildings on the health and well-being of people and communities.</p> <p>.....</p>	While Transpower supports the introductory text to the RESZ chapter, it submits the text could benefit from additional wording to highlight to plan users the existence of other qualifying matters. As currently drafted, the wording infers the only qualifying matters that apply to the RESZ are those in respect to Height Controls – Shading, and Height Control – Heritage, HIRB Control – Heritage, Height Control – SASM, and HIRB Control – SASM.	<p>Reject</p> <p>S42A: Part B – Residential Zones, Planning Maps and General Topics</p> <p>Para 382. “I consider that the additional wording sought by Transpower, generally duplicates wording already contained in the How the Plan Works, General Approach section of the PDP. Their proposed wording would not add any further understanding or direction for plan users over and above the existing wording.”</p>	Accept the recommendation on the basis text is provided within the introductory text. While Transpower would prefer text within the relevant chapter, it accepts the reasoning provided.
OS53.13	RESZ - General	Support	Retain Objective RESZ-O3	Transpower supports Objective RESZ-O3 in that it recognises safe living environments. The management	Accept Agree with Submitter	Support the recommendation

	Objectives and Policies for all Residential Zones / Objectives / RESZ-O3			of activities within proximity of the National Grid gives effect to the objective in providing safe environments.	No specific commentary in S42A Report	on the basis the objective is retained as sought by Transpower.
OS53.14	RESZ - General Objectives and Policies for all Residential Zones / Policies / RESZ-P1	Amend	Amend RESZ-P1 as follows: RESZ-P1 Residential activity <i>Enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments, while <u>avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as specified by the relevant qualifying matter area provisions.</u></i>	Within the Medium Density Residential Zone existing qualifying matter areas may limit the amount of permitted medium density development possible on an allotment. While the policy directive within MRZ-P1 is supported (and reflects Schedule 3A Part 1(6)(2) of the RMA), Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development. While RESZ-P2 references qualifying matters, it does not refer to appropriateness.	Reject S42A: Part B – Residential Zones, Planning Maps and General Topics Para 432 - 433 “Under s77G(5)(a) to the RMA, a specified territorial authority must include the MDRS objectives and policies into its district plan. RESZ-P1 incorporates MDRS policy 1 into the PDP. The MDRS objectives and policies cannot be changed in a way that changes their meaning. In my opinion, the changes sought by the submitters represent such a change to RESZ-P1. Requiring “avoiding” in the policy in relation to qualifying matters, as sought by Transpower, represents a more onerous threshold than the modifications allowed to density standards, under s77G(6) to the RMA. I would also note that the change is not necessary since qualifying matters are specifically identified in the PDP provisions. For example, while the rule restricting development in the National Grid Yard is included in the MRZ90 chapter, the relevant policy that it implements is contained in INF-Infrastructure chapter. The amendment sought by Transpower would be a broad duplication of PDP “qualifying matter” policies; namely those that have the effect of modifying MDRS density standards and/or NPS-UD building heights or density.”	Accept the recommendation on the basis the policy as notified reflects the policy in the MDRS, and retention of RESZ-P2 which references ‘Qualifying matters.’

OS53.15	RESZ - General Objectives and Policies for all Residential Zones / Policies / RESZ-P2	Support	Retain RESZ-P2	Transpower supports RESZ-P2 (noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA) in that it recognises qualifying matters.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation on the basis the policy is retained as sought by Transpower.
OS53.16	RESZ - General Objectives and Policies for all Residential Zones / Policies / RESZ-P8	Support	Retain RESZ-P8	Transpower is largely supportive of RESZ-P8 on the basis the policy is specific to the permitted activity standards within MRZ-ZR1.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation on the basis the policy is retained as sought by Transpower.
OS53.17	MRZ - Medium Density Residential Zone / General	Support	Retain the introductory text to the MRZ zone, in particular the second bullet point and listing of MRZ-R16.	The Medium Density Residential Zone (“MRZ”) is the only urban area of relevance to Transpower in relation to Variation 1 on the basis existing National Grid assets only traverse the MRZ and no other urban areas (noting the Open Space Zone and Future Urban Zone are not subject to Variation 1). Refer image in Appendix E. As outlined in the reasoning and assessment provided in Appendix C to this submission, the National Grid is a qualifying matter under the RMA. The introductory text to the MRZ zone is supported as it clearly outlines the legal effect and relationship between various provisions within Variation 1 and the 2020 PDP version. Specific to the National Grid, Transpower supports reference to MRZ-R16 within the first bullet point.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation on the basis the introductory text is retained as sought by Transpower.
OS53.18	MRZ - Medium Density	Support	Retain MRZ-O1	The general intent of Objective MRZ-O1 is supported, noting that clauses 2 and 3 of the objective reference health, wellbeing and safety. Specific to the National Grid, the avoidance of sensitive activities within the	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation on the basis the objective is

	Residential Zone / Objective / MRZ-O1			defined National Grid Yard helps to achieves a safe urban environment. It is noted that the infrastructure chapter objectives and policies also apply to residential activities (where relevant). They provide greater context and policy consideration for the appropriateness of activities.		retained as sought by Transpower.
OS53.19	MRZ - Medium Density Residential Zone /Rules	Support	Retain the introductory text to the rules within the MRZ chapter.	Transpower supports reference to the infrastructure chapter objectives and policies as such reference will assist in plan interpretation and application.	Accept Agree with Submitter No specific commentary in S42A Report	Support the recommendation on the basis the introductory text is retained as sought by Transpower.
OS53.20	MRZ - Medium Density Residential Zone / Rules / MRZ-R1	Amend	Amend Rule MRZ-R1 as follows: MRZ-R1 Buildings and structures, including additions and alterations, but excluding fences and stand-alone walls 1. Activity status: Permitted Where: a. Compliance is achieved with: Notification: ... <u>Note: Activities subject to MRZ-R1 shall comply with, and are subject to, the relevant provisions for qualifying matter areas.</u>	Rule MRZ-R1 is supported on the basis the National Grid is identified as a qualifying matter and for sites subject to rule MRZ-R16 (i.e., being with the National Grid Yard) the rules and standards of the Operative District Plan will apply until the Proposed District Plan including Variation 1 has legal effect. However, an amendment is sought to the rule in the form of a note to clarify for plan users that activities subject to the rule are subject to the qualifying matter area provisions. The note would assist with plan interpretation and application.	Reject S42A: Part B – Residential Zones, Planning Maps and General Topics Para 877 “In my opinion, the changes sought by Transpower are not necessary since they simply duplicate the “How the District Plan Works” section of the PDP. Variation 1 introduced additional guidance for plan users, including the following in relation to qualifying matters: <i>The limitations or restrictions to the MDRS and/or building heights and density requirements are contained in both area-specific (zone) rules and standards in Part 3 and standards and rules in Part</i> <i>2. Users will need to refer to both to determine whether a proposal requires a resource consent, and if so, its activity status.”</i>	Accept the recommendation on the basis text is provided within the introductory text. While Transpower would prefer text within the relevant chapter, it accepts the reasoning provided.
OS53.21	MRZ - Medium Density Residential Zone/ Rules / MRZ-R16	Support	That MRZ-R16 be retained as notified, subject to amendment to the National Grid Yard rules as sought in the Transpower submission to the PDP and	The wording within Variation 1 MRZ-R16 reflects the wording of the PDP GRZ-R5 which is proposed to be deleted in Variation 1 given the GRZ is to be deleted and replaced with the MRZ. In its submission to the PDP Transpower made a number of submission points, including on GRZ-R5.	Accept in part S42A: Part B – Residential Zones, Planning Maps and General Topics Para 929 “These provisions have been the subject of evidence at Hearing Stream 4. At that time, they were included in the General	Support recommendation on the basis the provisions defer to the earlier process. This approach

			evidence presented at hearings (Hearing Stream 4: Strategic directions, Energy, Infrastructure and Transpower, General District wide matters).	Evidence was also provided at Hearing Stream 4: Strategic directions, Energy, Infrastructure and Transport, General District wide matters. The relief sought by Transpower through its submission and hearing evidence stands. Notwithstanding the amendments sought, for the reasons provided in the upfront reasoning to this submission and the assessment provided in Appendix C (forming part of this submission), Transpower supports MRZ-R16 on the basis the rule which essentially makes new (or extensions to) buildings or structures for a sensitive (residential) activity a non-complying activity. As outlined in Appendix C to this submission, as defined by section 77I and 77O of the RMA, the National Grid Corridor framework is considered a qualifying matter. Proposed rule MRZ-R16 (and R17 relating to activities within the National Grid Yard) reflects the non-complying activity status both within the Operative District Plan and the PDP (August 2020) for new building and structures for sensitive activities within the defined (12 metre wide as measured from the centreline and foundations of support structures) National Grid Yard.	Residential Zone but with deletion of this chapter in Variation 1, they have been transferred to the MRZ, through which the National Grid now passes. Given this, I defer to that earlier process and undertake no further assessment here. I recommend that the submission be accepted in part to acknowledge this earlier process.”	reflects that sought in the Transpower submission.
OS53.22	MRZ - Medium Density Residential Zone/ Rules / MRZ-R17	Support	That MRZ-R17 be retained as notified, subject to amendment to the National Grid Yard rules as sought in the Transpower submission to the PDP and evidence presented at hearings (in particular Hearing Stream 4: Strategic directions, Energy, Infrastructure and Transport, General District wide matters).	The wording within Variation 1 MRZ-R17 reflects the wording of the PDP GRZ-R14 which is proposed to be deleted in Variation 1 given the GRZ is to be deleted and replaced with the MRZ. In its submission to the PDP Transpower made a number of submission points including on GRZ-R14. Evidence was also provided at Hearing Stream 4: Strategic directions, Energy, Infrastructure and Transport, General District wide matters. The relief sought by Transpower through its submission and hearing evidence stands.	Accept in part S42A: Part B – Residential Zones, Planning Maps and General Topics Para 929 “These provisions have been the subject of evidence at Hearing Stream 4. At that time, they were included in the General Residential Zone but with deletion of this chapter in Variation 1, they have been transferred to the MRZ, through which the National Grid now passes. Given this, I defer to that earlier process and undertake no further assessment here. I recommend that the submission be accepted in part to acknowledge this earlier process.”	Support recommendation on the basis the provisions defer to the earlier process. This approach reflects that sought in the Transpower submission.
OS53.23	HRZ - High Density Residential	Neutral	Should the HRZ extent be amended such that existing National Grid	On the basis the extent of the High-Density Residential Zone is not amended, Transpower is neutral on the extent (as notified) and nature of provisions on the	Reject S42A: Part B – Residential Zones, Planning Maps and General Topics	Accept the officer recommendation on the basis the

	Zone / Genera		assets traverse the zone, Transpower seeks that the relief sought in its submission points to the MRZ also apply to the HRZ.	High-Density Residential zone. However, should the zone extent be amended such that existing National Grid assets traverse the zone, Transpower seeks that the relief sought in its submission points to the MRZ also apply to the HRZ.	Para 528 "In relation to the submission from Transpower, there are no National Grid Yard assets in the HRZ. As such it is not necessary to add similar provisions to that found in the MRZ, which is traversed by the National Grid"	HRZ is not amended such that there are Grid assets within the zone.
OS53.24	General /Section 32 Evaluation Report	Support	Retain the Section 32 Evaluation and reference to the National Grid as a qualifying matter.	Although not forming part of the IPI, Transpower supports reference to the National Grid as a qualifying matter within the Section 32, Part A. It is noted that the National Grid Yard provisions not only amend the height standards but also density.	Not specifically addressed in S42A Report.	No specific relief to PDP sought and therefore no specific recommendation.