



RMA Form 6

Further submission – Proposed Porirua District Plan

Clause 8 of First Schedule, Resource Management Act 1991

To: Porirua City Council
Email to: dpreview@porirua.govt.nz
Subject: Further submission - PDP
Post: Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY
Delivery: Ground Floor, Council Administration Building, Cobham Court, Porirua City, marked "Attention: Proposed District Plan, Environment and City Planning"

Closing date for further submissions is 5pm Tuesday, 11 May 2021

Submissions, a summary of decisions requested and submitter contact details can be viewed at:
www.porirua.govt.nz/proposeddistrictplan

Further Submitter Contact Details			
Full Name	<i>Last Name</i>		<i>First Name</i>
	<i>[insert additional rows if needed]</i>		
Or Company/Organisation Name <i>if applicable</i>	Transpower New Zealand Ltd		
Contact Person <i>if different</i>	Rebecca Eng		
Email Address for Service	Environment.Policy@transpower.co.nz		
Address	PO Box 17215, Greenlane		
	Auckland	1546	
Mail Address for Service <i>if different</i>			
Phone	<i>Mobile</i>	<i>Home</i>	<i>Work</i>
			09 590 7072
Attendance and wish to be heard at the hearing: <i>you must fill in both rows below</i>			
<input type="checkbox"/> I do not wish <input checked="" type="checkbox"/> I wish To be heard in support of my further submission <i>(Please tick relevant box)</i>			
<input type="checkbox"/> I will <input checked="" type="checkbox"/> I will not			

consider presenting a joint case with other submitters, who make a similar further submission, at a hearing.

(Please tick relevant box)

Relevance - you must select one box that applies to you:

- I am a person representing a relevant aspect of the public interest
- I am a person who has an interest in the proposal that is greater than the interest the general public has
- I am the local authority for the relevant area

Explain/specify the grounds for saying that you come within this category (you must fill this in):

Transpower NZ Ltd is the owner and operator of the National Grid. The need to operate, maintain, develop and upgrade the National Grid is identified as a matter of national significance under the National Policy Statement on Electricity Transmission 2008. Transpower also has an interest as a landowner and occupier.

Note to person making further submission:

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy note:

When a person or group makes a submission or further submission on the Proposed District Plan this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to PCC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons why your submission or your contact details should be kept confidential please contact the Environment & City Planning Team at dpreview@porirua.govt.nz.

Signature of person making further submission
(or person authorised to sign on behalf of
person making further submission)

.....

Date: 6 May 2021

(A signature is not required if you make your submission by electronic means.)

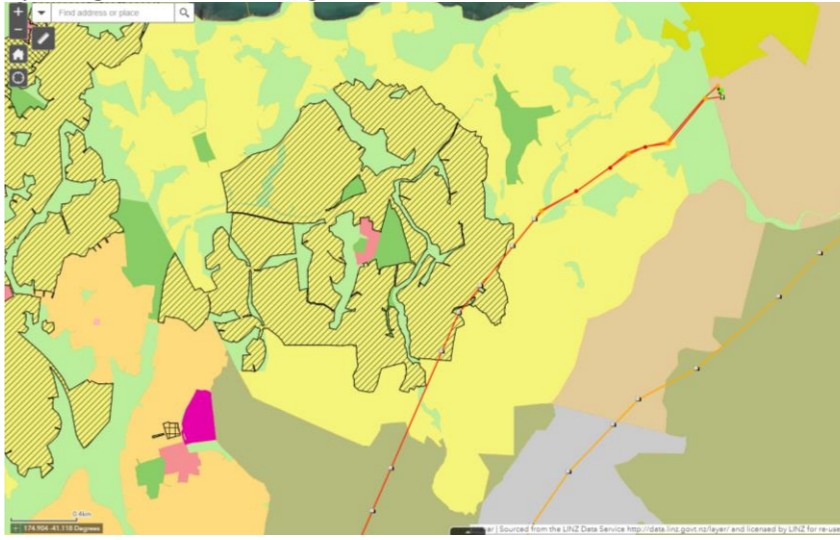
Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
General						
Kāinga Ora – Homes and Communities 81.936	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: General - Infrastructure <i>Opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions), including the spatial extent of the corridor overlay as shown in the PDP is deleted and updated with more suitable controls.</i></p> <p>Reasoning: <i>Kāinga Ora considers that the provisions of the National Grid Corridor are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p>	<p>The submission point is opposed. The reasoning provided in the Kāinga Ora submission is unclear as to why the submitter considers the National Grid provisions within the proposed plan are “overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid”.</p> <p>The need to operate, maintain, upgrade and develop the electricity transmission network is recognised as a matter of national significance through the NPSET. This significance applies universally across the country regardless of the nature of the specific National Grid asset. The NPSET Objective recognises that the network itself potentially gives rise to adverse effects, and that other activities can potentially adversely affect the network. The NPSET policies give direction on how to achieve the objective by providing for the recognition of the benefits of electricity transmission, as well as the management of the environmental effects of electricity transmission and the adverse effects of other activities on the transmission network. As such, the NPSET policies impose obligations on both decision-makers and Transpower itself.</p> <p>There are three broad aspects to the NPSET which must be given effect to in district plans, as below.</p> <ul style="list-style-type: none"> • Enabling the National Grid: Policies and plans must provide for the effective operation, maintenance, upgrading and development of the National Grid. This includes recognising the national benefits. Policy 1 specifies 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 and facilitating the use and development of new electricity generation, including renewable generation in the management of the effects of climate change. <p>In terms of its existing assets, Transpower undertakes a wide range of maintenance activities across its entire asset base. Typical maintenance activities include earthworks, vegetation trimming and clearance, and support structure maintenance activities. Some but not all of these activities are regulated under the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009. Transpower considers it necessary for the District Plan to adopt an enabling framework through which the benefits of the National Grid can be considered</p>	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
				<p>and recognised.</p> <ul style="list-style-type: none"> • <u>Managing the effects of the National Grid:</u> Associated with the development of National Grid assets is the potential for adverse environmental effects. Policies 2 to 9 relate to management of the environmental effects of electricity transmission. In particular, Policy 2 states: <i>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.</i> Policies 3 to 5 contain matters which decision-makers must consider, including technical and operational constraints, the route, site and method selection process, and operational requirements. Policy 6 of the NPSET seeks to reduce existing adverse effects where appropriate, while Policies 7 and 8 relate to effects on urban and rural environments respectively. Policy 9 specifically relates to health standards. Policies 2 to 9 are particularly relevant to the Proposed District Plan as they provide the policy framework for managing the environmental effects of electricity transmission in recognising and providing for the ongoing operation and development of the National Grid. The development of the National Grid must therefore be managed to ensure 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: <ul style="list-style-type: none"> - Allow for the consideration of the technical constraints and operational requirements under which the National Grid operates e.g. the linear nature of the transmission lines. - Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site and method selection. - Ensure new development seeks to avoid adverse effects on outstanding natural landscapes and areas of high natural character. This policy direction within the NPSET sets an appropriate rule framework for National Grid infrastructure. 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. The 'seek to avoid' approach within the Proposed District Plan gives effect to the above NPSET policies. • <u>Managing the effects on the National Grid:</u> In addition to the 		

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				<p>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. The location of buildings and activities, particularly 'sensitive activities' such as schools and residential properties, 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 most effective and efficient way of managing the potential for adverse effects on the National Grid is to adopt a corridor approach. This corridor approach is often referred to as the "National Grid Yard" and the "National Grid Subdivision Corridor". Adopting the National Grid corridor approach is supported by NPSET Policy 10 (that requires councils to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and ensure that the operation, maintenance, upgrading, and development of the electricity transmission network is not compromised) and Policy 11 (that requires councils to identify an appropriate buffer corridor, within which sensitive activities should generally not be provided for).</p> <p>Transpower only seeks the minimum plan restrictions necessary to ensure the NPSET is given effect to. The corridor approach allows for different size setbacks to be adopted depending on the asset type i.e. poles or towers and voltage. Importantly the National Grid Yard and National Grid Subdivision Corridor provides a consistent approach to managing the potential for adverse effects on the National Grid.</p>		

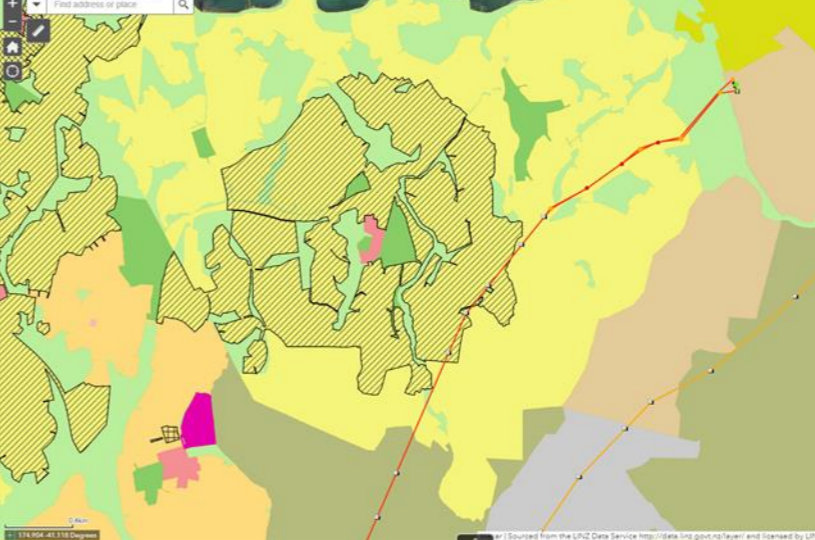
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				<p>The 10-12m "National Grid Yard" setback is based on the position of the conductors in normal everyday wind conditions, as well as space to allow the support structures and conductors to be accessed and provide sufficient space for most (but not all) maintenance activities. A 12m setback around each tower or support structure is also sought for access, maintenance and safety purposes. Within the National Grid Yard, Transpower seeks that new (and extensions to existing) 'sensitive' activities such as dwellings, schools and hospitals are afforded a non-complying activity status, and that other 'non-sensitive' activities such as intensively used milking sheds or piggeries, commercial, warehouse or retail activities (for example), should also be managed in the same way. This approach minimises disruption to landowners from Transpower's maintenance and operational activities, maintains access to National Grid assets and keeps people and property safe.</p> <p>Within the wider "The National Grid Subdivision Corridor" Transpower seeks to be consulted on subdivision applications by way of restricted discretionary activity status, defaulting to non-complying where standards are not met. Transpower seeks regulation of subdivision within corridors to prevent the creation of unusable or severely constrained lots (i.e. lots that cannot accommodate a building platform outside the National Grid Yard). The width of the National Grid Subdivision Corridor is based on the extent of the swing of the conductors in high winds. The distance a transmission conductor swings in the wind is dependent on the ambient temperature, the power being carried, the wind speed, the type and size of conductor, the tension the conductor is strung at, the supporting structure configuration (cross arm length) and the length of the span (distance between two towers or poles). As such the subdivision corridor width increases for higher voltage lines and towers as generally the span (distance between support structures) is greater for towers and combined with a higher voltage which makes the transmission lines heavier, means the conductor swing in high winds increases. The derived National Grid Subdivision Corridor widths are based on a 95th percentile span across the country.</p> <p>The approach proposed within the Proposed Porirua District Plan reflects the nationwide transmission corridor approach. The only exception to this nationwide approach is within the Auckland</p>		

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				<p>Unitary Plan which provides a variable National Grid Subdivision Corridor width based on the span length and tower/voltage as opposed to adopting the 95th percentile approach. (Note: The yard approach in Auckland reflects the 10-12m yard approach proposed in Porirua and reflects the nationwide approach). In respect of the subdivision corridor width, the approach within Auckland was agreed at Environment Court mediation and reflects the uniqueness of Auckland in terms of the higher population density, the extent of developed land traversed by existing National Grid transmission lines being approximately 150km (termed "underbuild") and the pressure on further intensification of these underbuilt areas. Such an intensification demand is not anticipated within land within Porirua that features National Grid assets, noting the proposed Porirua District Plan does not identify Medium Density Residential zoning in such areas.</p> <p>The National Grid corridor approach adopted within the proposed plan gives effect to the NPSET, reflects the corridor management approach sought across New Zealand (bar the Auckland Unitary Plan which had a different approach for the width of the subdivision corridor) and in the absence of any clear alternate framework and reasoning as to what would be "more suitable controls", the submission point is opposed.</p>		
Kāinga Ora – Homes and Communities 81.240	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Support	<p>Plan Provision: General - Infrastructure, How the Plan Works</p> <p><i>Amend:</i> <i>Kāinga Ora seeks consequential amendments consistent with its overall submission on the PDP. Key areas of concern are (but not limited to):</i></p> <ol style="list-style-type: none"> 1. All rules relating to Transport (street, intersection, accessway, parking design etc), should be within the TR chapter, not within the INF chapter of the PDP. This makes navigating the PDP cumbersome and requires continual cross referencing. In such cases it is likely that some consenting matters may be missed; 2. Complete reconsideration of the road and access design standards; 3. National Grid provisions (objectives, policies, rules, definitions, and spatial mapping); 4. Deletion of reference to any design guidelines or land development standards as de facto rules to be complied with; 5. Recognition through policy wording that the zones 'enable' certain types of development rather than 'allow'; 6. Redrafting of non-notification clauses; <p><i>Consequential renumbering etc. associated with changes sought</i></p> <p>Reasoning: <i>Kāinga Ora seeks amendments to the entire infrastructure chapter, consistent with its overall submission on the PDP.</i></p>	<p>In its reasoning for submission point 81.240, the submitter (Kāinga Ora) "opposes the current approach taken in the PDP where provisions to manage the effects of other activities on network utilities are spread throughout the PDP - i.e. they are found in the INF chapter along with the zone-based chapters and district wide chapters. This creates considerable duplication and confusion when navigating the PDP."</p> <p>Notwithstanding its opposition to the relief sought in submission point 81.936 for the deletion of all provisions in the Proposed District Plan, Transpower supports the relief sought in submission point 81.240 in so far as it relates to the dispersal of National Grid provisions across various chapters.</p> <p>In its original submission Transpower sought the relocation of all relevant National Grid provisions and rules to the Infrastructure Chapter on the basis such an approach would reflect the National Planning Standards and provide a coherent and comprehensive set of National Grid specific provisions in one chapter within the proposed plan, that would be easier for plan users to navigate.</p>	Allow	That part of the submission relating to the location of National Grid provisions within the proposed plan, be allowed.

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			<p><i>Kāinga Ora opposes the placement of land development related transport related provisions in the infrastructure chapter and requests that all relevant transport objectives, policies, rules, and standards (with associated tables + figures) are located in the Transport chapter. This request is consistent with the approach taken in the PDP whereby provisions relevant to renewable energy generation facilities are located in the Renewable Electricity Generation chapter. This will assist with the usability of an already complex PDP.</i></p> <p><i>Kāinga Ora opposes the current approach taken in the PDP where provisions to manage the effects of other activities on network utilities are spread throughout the PDP - i.e. they are found in the INF chapter along with the zone-based chapters and district wide chapters. This creates considerable duplication and confusion when navigating the PDP.</i></p>			
<p>Kāinga Ora – Homes and Communities</p> <p>81.940</p>	<p>developmentplanning@hnzc.co.nz</p> <p>kwilliams@propertygroup.co.nz</p>	Oppose	<p>Plan Provision: General – How the Plan Works</p> <p><i>Amendments are sought throughout the PDP to remove reference to 'avoiding' such activities, in favour of the term 'discourage', or inclusion of qualifying statements given the specific meaning that 'avoid' has following on from Environmental Defence Society Inc v New Zealand King Salmon Company Ltd [2014] NZSC 38 ("King Salmon").</i></p>	<p>Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid. The NPSET uses 'avoid' in its policies and Transpower would oppose any amendments which do not give effect to the NPSET.</p>	Disallow	<p>That part of the submission that would impact on provisions relating to the effect of activities on the National Grid within the proposed plan, be disallowed.</p>
<p>Kāinga Ora – Homes and Communities</p> <p>81.919</p>	<p>developmentplanning@hnzc.co.nz</p> <p>kwilliams@propertygroup.co.nz</p>	Oppose	<p>Plan Provision: General</p> <p><i>Seeks an amendment to the threshold at which point resource consent is required in the MRZ, increasing this to four or more residential units.</i></p> <p>Reasoning:</p> <p><i>In commercial zones, seeks no limiting threshold for residential development. Should be a permitted activity subject to meeting performance standards. Seeks changes to the proposed bulk, location, site coverage and matters of discretion in the residential zones to sufficiently address likely impacts on amenity values while providing for a range of housing typologies.</i></p>	<p>In the absence of any details or clarification within the Kāinga Ora submission as to what are "more suitable controls" in relation to the National Grid, Transpower opposes any change to the consenting threshold that would impact on the National Grid.</p> <p>Figure 1 below shows the MDR zone (shown as striped area) sought by Kāinga Ora and existing National Grid assets.</p>  <p>Figure 1. National Grid assets and proposed MDR zone sought in the Kāinga Ora submission</p>	Disallow	<p>That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.</p>

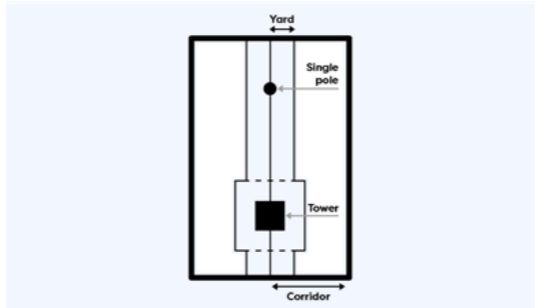
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Kāinga Ora – Homes and Communities 81.950	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	Plan Provision: General <i>That the proposed provisions of the PDP be deleted or amended, to address the matters raised in this submission and its attachments so as to provide for the sustainable management of the District's natural and physical resources and thereby achieve the purpose of the Act.</i>	For the reasons outlined in its further submission point to point 81.936, Transpower opposes the relief sought in submission point 81.950 as it relates to the National Grid.	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.
Waka Kotahi NZ Transport Agency 82.296	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Support	Plan Provision: General <i>Amending the use of the term minimise throughout the Proposed District Plan.</i> Reasoning: <i>Considers that the term is difficult to interpret and apply in practice. For clarity it is considered that the term be replaced with 'mitigate; which aligns with the effects hierarchy under the RMA.</i> <i>The changes requested are made to:</i> <i>a. Ensure that Waka Kotahi can carry out its statutory obligations.</i> <i>b. Reduce interpretation and processing complications for decision makers.</i> <i>c. Provide clarity for all plan users.</i>	The term 'minimise' is used widely through the proposed plan but is not defined. In the absence of any clear definition or guidance as to what constitutes 'minimise' Transpower has concerns with the wide use of the term in relation to effects which are of a qualitative nature, as opposed to the application of the terms for quantitative effects which Transpower is generally comfortable with.	Allow	The whole of the submission point be allowed.
Heather Phillips and Donald Love 79.5	donald@moonlightfarm.co.nz	Oppose	Plan Provision: General – National Grid <i>Amend</i> Reasoning: <i>No reference is made to exclusion distances around the national grid that fires can be lit and the burning crop off-cuts or stubble can be undertaken. The plan includes other activities and safety distances from the national grid in Part 4: Appendices and Schedules Appendices APP14 - Designation Conditions for NZTA-03 and NZTA-04. It is silent on a very real danger that fires and their smoke and cause to the national grid transmission lines.</i>	While Transpower supports the intent of the query and acknowledges that fires within proximity of the National Grid are a significant hazard, Transpower would not support regulation of such activities within the District Plan, noting fire permits are outside the ambit of the District Plan and air discharges are regulated by the regional plan.	Disallow	The whole of the submission point be disallowed.
Planning Maps						
Kāinga Ora – Homes and Communities 81.941	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	Plan Provision: Planning Maps - Rezoning, Section 32 Evaluation Report, National Policy Statement for Urban Development 2020 <i>See maps appended to this submission as Attachment 3 [to Kāinga Ora submission] which show the areas where residential [MRZ] rezoning of the urban areas is sought.</i> Reasoning: <i>The residential zones and spatial extent do not sufficiently enable residential growth and intensification to meet the needs of Porirua or reflect the requirements of the NPS-UD.</i> <i>Supports the introduction of the MRZ and the enabling framework of this zone, and the introduction of the Residential Intensification Precincts within the MRZ in Eastern Porirua. However as a whole the proposed zones do not adequately enable residential intensification in and close to urban centres.</i> <i>Amendments sought to better enable and incentivise residential development and greater opportunities for intensification.</i>	As shown in Figure 2 below, a portion of the area sought to be rezoned as Medium Density Residential is traversed by National Grid lines.	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:

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				 <p>While Transpower does not in itself oppose the rezoning of land to Medium Density Residential, in the absence of any details or clarification within the Kāinga Ora submission as to what are “more suitable controls” in relation to the National Grid, Transpower reserves its position in relation to the any rezoning of land to MDR which is subject to National Grid lines. On the basis the National Grid provisions apply (as notified but subject to the amendment as sought in the Transpower original submission) Transpower is neutral on the rezoning but notes that if the land is rezoned, the National Grid Yard provisions will need to be inserted into the chapter given that under the plan as notified, no National Grid lines traverse MDR zoned land.</p>		
<p>Kāinga Ora – Homes and Communities</p> <p>81.18</p>	<p>developmentplanning@hnzc.co.nz</p> <p>kwilliams@propertygroup.co.nz</p>	<p>Oppose</p>	<p>Plan Provision: Planning Maps - Rezoning; Section 32 Evaluation report <i>Rezone or extend the Medium Density Residential Zone as shown in Appendix 3 to submission.</i></p> <p>Reasoning: <i>The spatial application of MRZ should be generally based upon the availability of, and proximity to, various commercial and community facilities (e.g. commercial centres, community facilities, schools, reserves and open space as well as schools etc.) as well as the public transport network. As a result, Kāinga Ora has appended a series of maps to this submission as Attachment 3 which show the areas where residential rezoning of the urban areas is sought, based on best practice urban design and urban planning principles relating to proximity to supporting amenities and facilities. The proposed areas for rezoning are located within catchment areas reflecting the zoning principles discussed below. The proposed zone boundaries are matched to property boundaries and reflect logical zoning extents; so, in some areas they include land just beyond the outer extremity of the catchment, and conversely some land within the catchment has been excluded where it is not logical to rezone. Roads have typically been used as natural boundaries.</i></p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.941, the submission point is opposed.</p>	<p>Disallow</p>	<p>That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.</p>

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			<i>The key aspects of the principles applied in Kāinga Ora's proposed MRZ rezoning seek to provide for and enable further opportunities for medium density residential intensification, generally within an 800m (10min) walkable catchment from Local Centres and within a 400m (5min) walk of public transport routes, and proximity to, various commercial and community facilities (e.g. commercial centres, community facilities, schools, reserves and open space as well as schools etc.). In accordance with the NPS-UD, residential areas that are well serviced by the high frequency public transport bus network have also been identified for inclusion (this primarily includes areas of the city serviced by the 220 bus route). Kāinga Ora submits that these principles should generally apply.</i>			
Kāinga Ora – Homes and Communities 81.911	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	Plan Provision: Planning Maps – General <i>Seeks increased spatial extent of MRZ and increased heights in urban zones (both commercial and residential)</i> Reasoning: <i>The residential zones and spatial extent do not sufficiently enable residential growth and intensification to meet the needs of Porirua or reflect the requirements of the NPS-UD. Supports the introduction of the MRZ and the enabling framework of this zone, and the introduction of the Residential Intensification Precincts within the MRZ in Eastern Porirua. However as a whole the proposed zones do not adequately enable residential intensification in and close to urban centres. Amendments sought to better enable and incentivise residential development and greater opportunities for intensification.</i>	For the reasons outlined in Transpower's further submission point on submission point 81.941, the submission point is opposed.	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.
Part 1: Introduction and General Provisions						
Interpretation > Definitions						
Queen Elizabeth the Second National Trust (QEII) 216.4	mlucas@qeii.org.nz	Oppose	Plan Provision: Definitions – Include a New Definition Include new definition: <u><i>Vegetation removal</i></u> <u><i>means the removal or destruction of vegetation (exotic or indigenous) by mechanical or chemical means, including felling vegetation, spraying of vegetation by hand or aerial means, hand removal, and the burning, smothering or clearance of vegetation by any other means.</i></u> Reasoning: <i>A definition is required to ensure the vegetation removal covers all relevant activities.</i>	While the provision of a definition is not itself opposed, the introduction of the definition may cause confusion to plan users given the term itself is only used approximately 14 places within the plan, and may cause confusion with the references to "removal of vegetation" that is more frequently used in the plan.	Disallow	The whole of the submission point be disallowed.
Kāinga Ora – Homes and Communities 81.36	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Support	Plan Provision: Definitions – Biodiversity Compensation <i>Retain definition of Biodiversity compensation as notified</i>	Transpower supports the provision of a definition as it provides clarity and certainty.	Allow	The whole of the submission point be allowed.

Transpower's further submission:						
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Royal Forest and Bird Protection Society 225.59	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: Definitions – Construction Activity Delete definition of: <i>Construction Activity</i> Replace references to this term with the specific activities intended to be captured.</p> <p>Reasoning: It is confusing that construction activities associated with infrastructure are excluded. Infrastructure activities are addressed many chapters not just the INF chapter and using a variety of terms, many of which are identified under "infrastructure" in Interpretation for Definitions Nesting Tables. It is not clear whether "construction activities" is intended to be excluded from applying to all of these terms as well. Many of the provisions in the district wide chapters refer to new buildings or structures. While the 'note' for rule states that a number of provisions apply to an activity, building, structure or site, it is not clear whether an activity captured within the definition of "construction activity" would be subject to a rule which applies to a building or structure or visa versa. We are concerned that effects on indigenous biodiversity including on SNAs would not be considered or appropriately addressed.</p>	Transpower supports the definition as notified in terms of its relationship to the Infrastructure Chapter.	Disallow	The whole of the submission point be disallowed.
Kāinga Ora – Homes and Communities 81.109	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: Definitions – National Grid Corridor Delete definition of <i>National grid 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: a. 14m of a 110kV transmission line on single poles; b. 16m of a 110kV transmission line on pi poles; c. 32m of a 110kV transmission line on towers; d. 37m of a 220kV transmission line. The measurement of setback distances from National Grid transmission lines 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. Note: the National Grid 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 Corridor.</p> <p>Reasoning: Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. The definition gives effect to the NPSET in that it clearly articulates the framework in which to give effect to the NPSET.	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
Kāinga Ora – Homes and Communities 81.110	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: Definitions - National grid pauatahanui substation yard <i>Delete definition of National grid pauatahanui substation yard means the area located within 30m of the boundary of the National Grid Pauatahanui-Substation designation TPR-01.</i></p> <p>Reasoning: <i>Kāinga Ora opposes the National Grid provisions in their current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed.	Disallow	The whole of the submission point be disallowed.
Kāinga Ora – Homes and Communities 81.111	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: Definitions – National Grid Yard <i>Delete definition of National Grid Yard:</i> <i>a. the area located within 10m of either side of the centreline of an above ground 110kV electricity transmission line on single poles;</i> <i>b. the area located within 12m either side of the centreline of an above ground transmission line on pi-poles or towers that is 110kV or greater;</i> <i>c. the area located within 12m in any direction from the outer visible edge of an electricity transmission pole or tower foundation, associated with a line which is 110kV or greater.</i> <i>The measurement of setback distances from National Grid transmission lines 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.</i> <i>Note: the National Grid Yard 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 Corridor.</i></p>  <p>Reasoning: <i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the</i></p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. The definition gives effect to the NPSET in that it clearly articulates the framework in which to give effect to the NPSET.	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<i>National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i>			
Kāinga Ora – Homes and Communities 81.128	developmentplanning@hnzc.co.nz kwilliams@properygroup.co.nz	Support	<p>Plan Provision: Definitions – Pole</p> <p><i>Amend definition: National Grid transmission line Pole has the same meaning as given in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009: means a structure that supports conductors as part of a transmission line and that—</i></p> <p><i>a. has no more than 3 vertical supports; and</i></p> <p><i>b. is not a steel-lattice structure; and</i></p> <p><i>includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations</i></p> <p>Reasoning: <i>Kāinga Ora supports the proposed definition but requests the definition term is amended so as not to be confused with other uses of the term 'pole' such as 'light pole'.</i></p>	Transpower has no concerns with the sought amendment to the definition on the basis that it would provide clarity to plan users.	Allow	The whole of the submission point be allowed.
Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited 51.15	tom@incite.co.nz	Support	<p>Plan Provision: Definitions – Pole</p> <p><i>Amend definition as follows:</i></p> <p><i><u>Poles for electricity transmission activities</u> has the same meaning as given in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009:</i></p> <p><i>Pole</i></p> <p><i>means a structure that supports conductors as part of a transmission line and that—</i></p> <p><i>a. has no more than 3 vertical supports; and</i></p> <p><i>b. is not a steel-lattice structure; and</i></p> <p><i>includes the hardware associated with the structure (such as insulators, cross-arms, and guy-wires) and the structure's foundations</i></p> <p><i><u>Poles for telecommunications activities</u> has the same meaning as given in the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016: means a pole, mast, lattice tower or similar structure of a kind that is able to be used (with or without modification) to support antennas</i></p> <p>Reasoning: <i>Support a definition of pole. Seek that NESTF definition of Pole is also included and delete the definition of Telecommunications Pole. Consequential changes to the Infrastructure chapter will be necessary.</i></p>	Transpower has no concerns with the sought amendment to the definition on the basis that it would provide clarity to plan users.	Allow	The whole of the submission point be allowed and the definition be amended.
Wellington Electricity Lines Limited	tim.lester@edis.co.nz	Oppose	<p>Plan Provision: Definitions – Regionally Significant infrastructure</p> <p><i>Amend the definition as below:</i></p> <p><i>d) facilities for the generation and/or transmission of electricity where it is supplied to the <u>local</u> network;</i></p>	Transpower has concerns the sought amendment would add confusion to the definition. Electricity transmission is undertaken by Transpower and this is supplied nationwide, including for example where lines may pass through a district but not necessarily supply	Disallow	The whole of the submission point be disallowed and the definition be

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
85.6			<p>Reasoning: Distribution network consists of lower voltage electricity supply to the local network. The distribution also contains higher-voltage transmission lines that takes electricity supply from the National Grid which is then stepped down to a lower voltage to service the local network. Seeks the word 'local' immediately precedes the word network to appropriately differentiate these two distinct elements of the distribution network.</p>	electricity to it. The insertion of reference to 'local' potentially confuses the role provided by Transpower.		retained as notified.
Kāinga Ora – Homes and Communities 81.174	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Support	<p>Plan Provision: Definitions – Tower Amend definition: National Grid transmission line tower has the same meaning as given in the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009: a. means a steel-lattice structure that supports conductors as part of a transmission line; and includes the hardware associated with the structure (such as insulators, cross-arms, and guywires) and the structure's foundations.</p> <p>Reasoning: Kāinga Ora supports the proposed definition but requests the definition term is amended so as not to be confused with other uses of the term 'tower' such as in relation to telecommunications.</p>	Transpower has no concerns with the sought amendment to the definition on the basis that it would provide clarity to plan users.	Allow	The whole of the submission point be allowed and the definition be amended.
Wellington Electricity Lines Limited 85.7	tim.lester@edis.co.nz	Support	<p>Plan Provision: Definitions – Transmission Line Seek that provision is made to identify transmission lines that are not a component of the National Grid to provide for Wellington Electricity Lines Limited's regionally significant Sub Transmission lines.</p> <p>Reasoning: Acknowledges that NESETA is legislation applicable solely to that of the National Grid. There is a disconnect within the PDP whereby transmission lines that are not contained within the National Grid are specified (i.e., Infrastructure rules preamble). The definition only specifies National Grid transmission lines. The PDP references Transmission Lines not defined under the NES, however, the only definition for Transmission lines is taken from the NPS.</p>	Transpower acknowledges there are existing sub transmission lines within the Porirua District that do not form part of the National Grid and are therefore not regulated by the NESETA. On this basis Transpower is largely neutral on the relief sought in terms of provision for transmission lines that are not defined by the NESETA, provided the definition in relation to the NESETA is retained as notified.	Allow	The whole of the submission point be allowed, subject to retention of the notified definition of "Transmission Line".
Powerco Limited 83.13	planning@powerco.co.nz	Support	<p>Plan Provision: Definitions – Upgrading Amend the definition of upgrading as follows: 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.</p> <p>Reasoning: Upgrading works are a necessity and common. Clarity around this definition is important. As currently drafted it only applies to existing infrastructure. The ability to upgrade is significantly constrained.</p>	While the definition is of limited relevance to Transpower given the NESETA, given the definition is used within the policy framework and within rules INF-R34 and INF-S1, clarity around the term is supported.	Allow	The whole of the submission point be allowed and the definition be amended.
Part 2: District Wide Matters						
Strategic Direction: FC-Functioning City						

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
Royal Forest and Bird Protection Society 225.85	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: FC - Functioning City – FC-O1</p> <p><i>Amend the objective FC-O1 to include environmental outcomes as follows: Effective, efficient, resilient and safe infrastructure throughout the City that:</i></p> <ol style="list-style-type: none"> 1. Provides essential, reliable and secure services, including in emergencies; 2. Facilitates local, regional and national connectivity; 3. Contributes to the economy and supports a high standard of living; 4. Has sufficient capacity to accommodate existing and planned growth; 5. Integrates with development; and 6. Enables people and communities to provide for their health and wellbeing; and 5. retains, protects and enhances indigenous biodiversity. <p>Reasoning: <i>The objectives are not consistent with sustainable management. Fail to integrate environmental outcomes into the objectives for the City/Porirua district.</i></p>	Objective O1 relates to the Strategic Direction "Functioning City". The sought reference to indigenous biodiversity is not appropriately located within the objective given the objective topic, rather the sought relief is already addressed within the Natural Environment Strategic Direction. On that basis it is not supported within the objective.	Disallow	The whole of the submission point be disallowed.
Royal Forest and Bird Protection Society 225.86	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: FC - Functioning City – FC-O2</p> <p><i>Amend FC-O2 as follows: The significance of the National Grid is recognised, and integrated with subdivision and development proposals to ensure sustainable, secure and efficient electricity transmission is provided through and within the city in appropriate locations.</i></p> <p>Reasoning: <i>Clarify whether city means the central city if not clarify that the objective is directed at integration with subdivision and development activities. The provision for the National Grid should not override the directive policies of the NZCPS or be provided without consideration of adverse effects on indigenous biodiversity and the extent to which such effects can be avoided.</i></p>	Objective FC-O2 as notified largely reflects the NPSET. While Transpower does not outright oppose the relief sought in submission 225.86, it has concerns as to the drafting and how the objective could be interpreted. The objective as notified applies to both new and existing National Grid assets. The sought reference to "integrated with subdivision and development proposals to ensure" implies that both new and existing National Grid assets must integrate with development. Given the technical and operational constraints associated with the Grid, such integration is not always possible, particularly in relation to existing National Grid assets. The reference to "appropriate locations" again would also apply to existing assets and does not recognise the existing operational and technical constraints. As notified, the objective does not preclude consideration of adverse effects or over-ride the NZCPS, noting there are no existing National Grid assets within the Coastal Environment (as identified in the Proposed District Plan as "Coastal Environment Inland Extent"). On this basis the relief sought is opposed.	Disallow	The whole of the submission point be disallowed.
Kāinga Ora – Homes and Communities 81.203	developmentplanning@hnzc.co.nz kwilliams@properygroup.co.nz	Oppose	<p>Plan Provision: FC - Functioning City – FC-O2</p> <p><i>Delete FC-O2: The significance of the National Grid is recognised, and sustainable, secure and efficient electricity transmission is provided through and within the city.</i></p> <p>Reasoning: <i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage</i></p>	The provision of a secure and efficient electricity is key to a functioning city and has local, regional and national benefits. The specific concerns and reasoning from the submitter as to why the objective is overly restrictive and does not manage sensitive activities, are not clear. The objective gives effect to the NPSET. For this reason and the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed.	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<i>sensitive activities within close proximity to and under the National Grid.</i>			
Powerco Limited 83.17	planning@powerco.co.nz	Support	<p>Plan Provision: FC - Functioning City – FC-04 <i>Amend the Objective FC – 04 as follows:</i> <i>Compatible activities with similar effects and functions are located together in appropriate areas (where technically and operationally feasible for infrastructure) and:...</i></p> <p>Reasoning: <i>Supports compatible activities locating together. This should recognise that infrastructure is needed everywhere a customer chooses to locate.</i></p>	Transpower supports the policy on the basis it appropriately recognises the technical and operational constraints of the National Grid.	Allow	The whole of the submission point be allowed.
Strategic Direction: NE- Natural Environment						
Royal Forest and Bird Protection Society 225.91	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: NE – Natural Environment NE-O1 New provision Retain NE-01</p> <p><i>Add new</i> <i>Indigenous biodiversity and habitats with indigenous biodiversity values are maintained to a healthy functioning state and, where appropriate, restored and enhanced.</i></p> <p><i>Add new</i> <i>The natural character and biodiversity of wetlands, and rivers and their margins, are protected from inappropriate subdivision, use and development.</i></p> <p>Reasoning: <i>Supports objective. Addition outcomes are also required to provide for the maintenance of indigenous biodiversity, enhancement where appropriate and the protection of natural character and wetlands. Indigenous ecosystems have been reduced in diversity and extent over time and while further subdivision, land use change, and development has the potential to pose risks in some areas, it can also provide opportunity for enhancement.</i></p>	<p>Transpower opposes the submission point in so far as it seeks a new objective/policy <u>Indigenous biodiversity and habitats with indigenous biodiversity values are maintained to a healthy functioning state and, where appropriate, restored and enhanced.</u></p> <p>The sought clause is opposed on the basis it goes beyond Section 6 of the RMA in that it applies to all indigenous biodiversity and is not confined to “significant”. The Proposed Plan should not pre-empt the draft NPS Indigenous Biodiversity.</p>	Disallow	That part of the submission seeking a new objective/policy <u>Indigenous biodiversity and habitats with indigenous biodiversity values are maintained to a healthy functioning state and, where appropriate, restored and enhanced.</u> be disallowed.
Energy, Infrastructure, Transport: INF-Infrastructure						
Royal Forest and Bird Protection Society 225.102	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: INF – Infrastructure – General Clarify the:</p> <ul style="list-style-type: none"> scope of the chapter relationship with other chapters the provision for overlays within the context of this chapter. Amend the chapter to be specific to Regionally Significant Infrastructure. Consider combining SRI and renewable energy chapters. <p>Amend the provisions to allow for full consideration of the ECO chapter where:</p> <ul style="list-style-type: none"> an activity is considered within an Overlay or within 15m of an SNA 	Specific to the National Grid, Transpower supports (subject to refinement as sought in its original submission) the INF-Infrastructure chapter as notified in terms of its relationship to other chapters in the PDP. The proposed “note” within the chapter provides clarity and is supported. Transpower opposes any change in the relationship statement. A change in activity status is also opposed in relation to the National Grid.	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p><i>or natural wetland</i></p> <ul style="list-style-type: none"> <i>the development of new infrastructure is proposed within a SCHED7 SNA or natural wetland make the rule activity status NC</i> <i>the development of new infrastructure is proposed outside of a SCHED7 SNA but would require the clearance of indigenous vegetation make the rule activity status Discretionary.</i> <p>Reasoning: <i>Scope of this chapter is uncertain. Despite referring to three waters network, transport and communications as being infrastructure in the first sentence, there are separate chapters for those matters which are not listed as relevant to this chapter in the "note". The statement that the chapter also manages infrastructure within Overlays is uncertain as the relationship with overlay chapters is not explained, nor are the specific overlays identified. ECO chapter rules also include provisions relating to some infrastructure including for the safe operation of roads and rail. Even for the separate chapter for Renewable Electricity Generation which is explained as being covered by a different chapter, the relationship to this chapter is uncertain as the "note" suggests it is relevant to this chapter. The scope appears to include infrastructure beyond Regionally Significant Infrastructure (RSI) and the National Grid to infrastructure that does not have any specific mandate from higher order documents. These issues all create uncertainty and potential inconsistency for applying the ECO provisions. The approach taken means that objectives of other chapters, in particular for overlays are not able to be considered in consent processes. Nor is it clear that the policies and rules in this chapter implement those objectives. Reference to specific policies in other chapters is not sufficient for integration of those matters within this chapter. Concerning as the chapters for Natural Hazards, Historic Heritage, Notable Trees, Sites of Significance to Maori and the Natural Environmental Values chapters do not apply; these chapters all set out matters which should be considered prior to infrastructure provision.</i></p>			
Royal Forest and Bird Protection Society 225.30	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: INF - Infrastructure - General <i>Amend so that the full suite of ECO provisions apply to the INF chapter.</i></p> <p>Reasoning: <i>The Infrastructure section is directive in providing for infrastructure across Porirua. Considers this incompatible with Council's s6(c) obligations. The objectives provide for infrastructure over the protection of SNAs. Concerned that the Infrastructure section could result in the loss of indigenous biodiversity due to the absence of adequate provisions for protection. Provision needs to be made for indigenous biodiversity protection throughout the Infrastructure section. Provision for infrastructure is secondary to s6(c) of the RMA.</i> <i>The separation of biodiversity considerations in the INF chapter from the ECO chapter is particularly concerning. This does not allow decision makers to consider the full spectrum of ECO policies which implement the objectives, or event the ability to consider whether the decision they are making achieves the ECO and strategic</i></p>	Transpower opposes any change in the relationship between the INF chapter and the ECO Chapter on the basis a more efficient approach is to have chapters self-reliant as much as possible to reduce any conflict between provisions. It is noted cross referencing is provided and this is considered a more effective and efficient approach than having the full suite of ECO provisions apply to the INF chapter.	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<i>objectives.</i>			
Royal Forest and Bird Protection Society 225.103	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: INF - Infrastructure - INF-O1</p> <p><i>Amend INF-O1 as follows:</i></p> <p><i>The national, regional and local benefits of Regionally Significant Infrastructure are recognised and provided for <u>in appropriate locations</u></i></p> <p>Reasoning:</p> <p><i>The RPS directs the recognition of the benefits of RSI and the consideration of social, economic, cultural and environmental benefits. It does not direct that RSI would be provided for over environmental protections which are to be provided for under s6 of the Act or over Councils functions to maintain indigenous biological diversity. RPS objective is for recognition and protection of RSI. Add context so that objective to provide does not override protection.</i></p>	Transpower opposes the relief sought in the submission point on the basis the additional wording is not required and instead the policies determine what is an 'appropriate location'.	Disallow	The whole of the submission point be disallowed.
Kāinga Ora – Homes and Communities 81.251	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: INF - Infrastructure - INF-P5</p> <p><i>Delete INF-P5:</i></p> <p><i>Protect the safe and efficient operation, maintenance and repair, upgrading, removal and development of Regionally Significant Infrastructure from being unreasonably compromised by:</i></p> <p><i>1. Avoiding sensitive activities and building platforms located within the National Grid Yard;</i></p> <p><i>2. Only allowing subdivision within the National Grid Corridor where it can be demonstrated that any adverse effects on and from the National Grid, including public health and safety, will be avoided, remedied or mitigated, taking into account:</i></p> <p><i>a. The impact of subdivision layout and design on the operation and maintenance, and potential upgrade and development of the National Grid;</i></p> <p><i>b. The ability of any potential future development to comply with NZECP 34:2001 New Zealand Electricity Code of Practice for Electricity Safe Distances;</i></p> <p><i>c. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a dwelling can be provided outside of the National Grid Yard for each new lot;</i></p> <p><i>d. The risk to the structural integrity of the National Grid;</i></p> <p><i>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;</i></p> <p><i>3. Only allowing sensitive activities within the Gas Transmission Pipeline Corridor where these are of a scale and nature that will not compromise the Gas Transmission Network;</i></p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.</p> <p>Specific to the use of 'avoid' within the PDP, Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid and Policy INF-P5. Transpower would oppose any amendments which do not give effect to the NPSET.</p>	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p><i>4. Requiring new sensitive activities to be located and designed so that potential adverse effects of and on the Rail Corridor and State Highways are avoided, remedied or mitigated;</i></p> <p><i>5. Requiring any new buildings or structures to be of a nature and scale and to be located and designed to maintain safe distances within the National Grid and Gas Transmission Network;</i></p> <p><i>6. Considering any potential adverse effects of subdivision of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid, including:</i></p> <p><i>a. The impact of subdivision layout and design on the operation, maintenance and repair, and potential upgrade and development of the infrastructure;</i></p> <p><i>b. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a dwelling can be provided;</i></p> <p><i>c. The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity effects on and amenity and nuisance effects of the infrastructure; and</i></p> <p><i>7. Requiring subdivision of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation and maintenance and repair of, that infrastructure.</i></p> <p>Reasoning</p> <p><i>Kāinga Ora does not support the term "avoid" with a corresponding non-complying rule framework. Designation corridors by Requiring Authorities should be utilized where such a degree of protection is required.</i></p> <p><i>Kāinga Ora opposes the National Grid provisions in their current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the Proposed PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p> <p><i>Kāinga Ora opposes the noise provisions relevant to the Rail Corridor and State Highway network, and likewise opposes these aspects of this policy. Kāinga Ora notes that INF-P5, INF-P6 and INF-P7 appear to be managing the same issue. Kāinga Ora also notes that the subdivision chapter deals with these matters comprehensively, so this is unnecessary duplication.</i></p>			
Kāinga Ora – Homes and Communities 81.252	developmentplanning@hnzc.co.nz kwilliams@properygroup.co.nz	Oppose	<p>Plan Provision: INF - Infrastructure - INF-P6</p> <p><i>Delete INF-P6: Provide for the upgrading of the National Grid that is not permitted by the National Environmental Standards for Electricity Transmission Activities, while:</i></p> <p><i>1. Having regard to the extent to which adverse effects have been avoided;</i></p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 1-8 of the NPSET would be given effect to through the relief sought, (noting INF-P6 does not relate to third party activities,	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>remedied or mitigated;</p> <p>2. Recognising the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects;</p> <p>3. Applying the mitigation hierarchy in ECO-P2 and assessing the matters in ECO-P4, ECO-P11 and ECO-P12 when considering any upgrade within an area identified in SCHED7 - Significant Natural Areas;</p> <p>4. Recognising the potential benefits of upgrades to existing transmission lines to people and communities;</p> <p>5. In urban areas, minimising adverse effects on urban amenity and avoiding adverse effects on the City Centre Zone, Residential Zones, Open Space and Recreation Zones and existing sensitive activities;</p> <p>6. Seeking to avoid adverse effects on areas identified in SCHED9 - Outstanding Natural Features and Landscapes, SCHED11 - Coastal High Natural Character Areas, SCHED7 - Significant Natural Areas, SCHED10 - Special Amenity Landscapes and Open Space and Recreation Zones; and</p> <p>7. Considering opportunities to reduce existing adverse effects of the National Grid as part of any substantial upgrade.</p> <p>Reasoning:</p> <p><i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p>	rather provides the policy framework for managing the environmental effects of transmission).		
Royal Forest and Bird Protection Society 225.112	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: INF - Infrastructure - INF-P7</p> <p><i>Amend INF-P7 as follows:</i></p> <p><i>Provide for the development of the National Grid, while:</i></p> <p><i>1. In urban areas, minimising adverse effects on urban amenity and avoiding adverse effects on the City Centre Zone, Open Space and Recreation Zones and existing sensitive activities;</i></p> <p><i>2. Seeking to avoid the adverse effects of the National Grid within areas identified in SCHED9 - Outstanding Natural Features and Landscapes outside of the Coastal Environment, SCHED10 - Special Amenity Landscapes and Open Space and Recreation Zones;</i></p> <p><i>3. Avoiding the adverse effects of the National Grid within areas identified in SCHED9 - Outstanding Natural Features and Landscapes in the Coastal Environment;</i></p> <p><i>4. Avoiding adverse effects of the National Grid within areas identified in SCHED7 - Significant Natural Areas in the Coastal Environment and within natural wetlands</i></p> <p><i>Applying the mitigation hierarchy in ECO-P2 and assessing the matters in ECO-P4, ECO-P11 and ECO-P12 when considering the effects of the National Grid in an area</i></p>	<p>In its submission to the INF chapter, Transpower sought policy amendments to the National Grid policy framework.</p> <p>Specific to INF-P7. Clause 4. Transpower sought retention of the cross reference to the mitigation hierarchy, subject to amended policy references.</p> <p>As outlined in its original submission, the approach favoured by Transpower is to reconcile the tensions between the NZPCS (and also the NPSFM given it has come into effect since the proposed plan was notified). It is noted the NESFM recognises the National Grid as specified infrastructure with a discretionary activity status applying for works that affect wetlands. Such a consenting activity status reflects the 'seek to avoid' approach sought by Transpower.</p> <p>Notwithstanding Transpower's reluctance to impose an avoid requirement for indigenous biodiversity outside wetlands given the NPSIB is draft only and has not been gazetted, the policy approach recommended by Transpower does not 'allow' the National Grid to be located within the CE and within SNA's but rather sets the policy</p>	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p><i>identified in SCHED7 – Significant Natural Areas; and</i> <i>4A. Protecting SNAs and maintaining indigenous biological diversity; and</i> <i>5. When considering the adverse effects in respect of 1-4 above;</i> <i>a. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and</i> <i>b. Considering the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</i></p> <p>Reasoning: <i>The policy direction is inconsistent with Policy 11 of the NZCPS and the NPSFM with respect to wetlands. Development of the national grid should not be anticipated where protection of SNAs and natural wetlands cannot be achieved. Fails to provide for council's functions to maintain indigenous biological diversity.</i></p>	<p>framework for the effects of the National Grid to be assessed in a considered manner. The policy framework enables a case-by-case merits assessment of specific National Grid projects in high value natural areas through the resource consent process. This approach will allow decision-makers to have proper regard to national direction instruments. When considering the effects of new National Grid Infrastructure, Policies 3 and 4 of the NPSET (which also apply to any resource consent process) require consideration of the constraints imposed by technical and operational requirements of the network, and require regard be had to the extent which any adverse effects have been avoided, remedied or mitigated by the route site and method selection process. This is a very robust and comprehensive process that is enshrined in the national direction and undertaken by Transpower when carrying out major upgrades to or constructing new national grid infrastructure.</p>		
<p>Kāinga Ora – Homes and Communities</p> <p>81.253</p>	<p>developmentplanning@hnzc.co.nz</p> <p>kwilliams@propertygroup.co.nz</p>	Oppose	<p>Plan Provision: INF - Infrastructure - INF-P7 Delete INF-P7 Provide for the development of the National Grid, while: 1. In urban areas, minimising adverse effects on urban amenity and avoiding adverse effects on the City Centre Zone, Open Space and Recreation Zones and existing sensitive activities; 2. Seeking to avoid the adverse effects of the National Grid within areas identified in SCHED9 – Outstanding Natural Features and Landscapes outside of the Coastal Environment, SCHED10 – Special Amenity Landscapes and Open Space and Recreation Zones; 3. Avoiding the adverse effects of the National Grid within areas identified in SCHED9 – Outstanding Natural Features and Landscapes in the Coastal Environment; 4. Applying the mitigation hierarchy in ECO-P2 and assessing the matters in ECO-P4, ECO-P11 and ECO-P12 when considering the effects of the National Grid in an area identified in SCHED7 – Significant Natural Areas; and 5. When considering the adverse effects in respect of 1-4 above; a. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and b. Considering the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</p> <p>Reasoning: <i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora</i></p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 1-8 of the NPSET would be given effect to through the relief sought, (noting INF-P7 does not relate to third party activities as referenced in the submitter explanation to the submission point, rather provides the policy framework for managing the environmental effects of transmission).</p>	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<i>acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i>			
Wellington Electricity Lines Limited 85.22	tim.lester@edis.co.nz	Support	<p>Plan Provision: INF - Infrastructure - INF-P24</p> <p><i>Amend the policy INF-P24 as below:</i></p> <p><i>b) The extent to which the proposed development will avoid the potential reverse sensitivity effects on and amenity and nuisance effects of the National Grid Pāuatahanui Substation and associated equipment.</i></p> <p>Reasoning:</p> <p><i>Wellington Electricity Lines Limited supplies Porirua City and surrounds with a safe and secure electricity service through the Pāuatahanui Substation Grid Exit Point, a significant and strategic component of the district's electricity supply network. Assets contained within, or in close proximity to the Pāuatahanui Substation Yard (i.e., two feeders to the Plimmerton Area). Appreciate that the purpose of INF-P24 is to provide specific protection to the Transpower Substation that is not otherwise subject to NESETA. Given the strategic importance the site has for the district's electricity distribution network, contend that appropriate (subtle) recognition is contained within the policy in regard to the integrated nature of WELL's operation within or adjacent to the substation yard. A minor amendment is sought to clause 1b) of INF-P24.</i></p>	Transpower has no concerns with the sought wording.	Allow	The whole of the submission point be allowed.
Kāinga Ora – Homes and Communities 81.270	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: INF - Infrastructure - INF-P24</p> <p><i>Delete:</i></p> <p><i>Consider the following matters when assessing any buildings, structures and activities proposed within the National Grid Pauatahanui Substation Yard:</i></p> <p><i>1. Where located in the Settlement Zone:</i></p> <p><i>The extent to which the proposed development design and layout enables appropriate separation distances between sensitive activities and the substation; and</i></p> <p><i>b. The extent to which the proposed development will avoid the potential reverse sensitivity effects on and amenity and nuisance effects of the National Grid Pauatahanui Substation.</i></p> <p><i>2. Where located in any zone, including the Settlement Zone:</i></p> <p><i>a. The risk of electrical hazards affecting public or individual safety, and the risk of property damage;</i></p> <p><i>b. Measures proposed to mitigate other adverse effects on the operation, maintenance, upgrading and development of the substation;</i></p> <p><i>c. Technical advice from an electrical engineer specialising in electricity transmission;</i></p> <p><i>d. The outcome of any consultation with Transpower; and</i></p> <p><i>e. Whether the building, structure or sensitive activity could be located further from the substation.</i></p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>Reasoning:</p> <p><i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p>			
Wellington Electricity Lines Limited 85.23	tim.lester@edison.co.nz	Support	<p>Plan Provision: INF - Infrastructure - Note</p> <p><i>Seeks a definition, or other mechanism such as an advice note, to the effect that electricity transmission function is commonly undertaken outside of the NESETA such as Sub Transmission line function.</i></p> <p>Reasoning:</p> <p><i>Considers that the wording used in the Rules preamble is remiss in regard to the definition for Transmission Line. The statement in the Rules preamble is not clear as it refers to Transmission Lines that are not part of the National Grid. The definition for Transmission Line is explicit that they only refer to the NESETA. WELL own and operate a significant network of Sub Transmission Lines across the Porirua District and wider Wellington Region. Such lines are designed to operate for higher voltage transmission purposes (i.e., transmission of high voltage electricity from Grid Exit Points to step-down zone substations and distribution substations), and consequently represent transmission lines that are discrete to the local-lines network and are a part of the network that "does not relate to an existing transmission line that is part of the National Grid". Seeks that provision is made in the PDP for Transmission Lines that are not defined by the NESETA.</i></p>	Transpower acknowledges there are existing sub transmission lines within the Porirua District that do not form part of the National Grid and are therefore not regulated by the NESETA. On this basis Transpower is largely neutral on the relief sought in terms of provision for transmission lines that are not defined by the NESETA, provided the wording in relation to the NESETA is retained as notified.	Allow	The whole of the submission point be allowed, subject to retention of the wording relating to the NESETA.
Kāinga Ora – Homes and Communities 81.297	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: INF - Infrastructure INF-R25, - Notification preclusion</p> <p><i>Amend:</i></p> <p>1. Activity status: Permitted</p> <p><i>Where:</i></p> <p><i>Within the National Grid Yard the infrastructure is not for the reticulation and storage of water for irrigation purposes; and</i></p> <p><i>b. Any earthworks within the National Grid Yard do not:</i></p> <p><i>i. Exceed 300mm in depth within 6m of the outer visible edge of a tower support structure;</i></p> <p><i>ii. Exceed 3m in depth between 6m and 12m of the outer visible edge of a tower support structure; and</i></p> <p><i>iii. Result in a reduction of the existing conductor clearance distances.</i></p> <p><i>Any earthworks within the Gas Transmission Pipeline Corridor do not exceed 400mm in depth.</i></p> <p><i>Note:</i></p> <p><i>To avoid doubt, all other rules in this table also apply to any infrastructure within the National Grid Yard and Gas Transmission Pipeline Corridor.</i></p>	<p>Earthworks are activities that can compromise the National Grid and are a form of development contemplated by the NPSET that should be regulated under Policy 10.</p> <p>Rule INF-R25 as notified provides a rule framework which allows earthworks where certain standards are met such as depth for earthworks, distance from support structure, maintaining access and conductor clearance. These conditions provide a suitable framework for allowing certain earthwork activities which do not compromise the National Grid.</p> <p>In addition to the above, for the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how the NPSET, and in particular policies 10 and 11, would be given effect to through the relief sought.</p>	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>2. Activity status: Restricted discretionary Where:</p> <p>a. Compliance is not achieved with INF-R25-1.c. Matters of discretion are restricted to:</p> <p>1. The matters in EW-P5.</p> <p><u>Notification:</u> <u>Applications under this rule are precluded from being publicly or limited notified in accordance with section 95A or section 95B of the RMA, except that First Gas Limited may be notified.</u></p> <p>Notification: An application under this rule is precluded from being publicly notified in accordance with sections 95A of the RMA.</p> <p>When deciding whether any person is affected in relation to this rule for the purpose of section 95E of the RMA, the Council will give specific consideration to any adverse effects on First Gas Limited.</p> <p>Reasoning: Kāinga Ora opposes the National Grid provisions in their current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid. Kāinga Ora generally supports this rule in relation to earthworks in the Gas Transmission Pipeline Corridor but seeks amendment to the non-notification clause to the RDIS component of the rule to more clearly reflect the intended preclusion from both public and limited notification. Kāinga Ora also questions the use of non-notification clauses for non-complying activities, noting that this does not accord with best practice. Deletion of this preclusion statement is requested.</p>			
Firstgas Limited 84.20	Natalie.Webb@beca.com	Support	<p>Plan Provision: INF – Infrastructure - INF-R25 Amend Rule as follows: Infrastructure and the operation, maintenance and repair, upgrading and removal of existing infrastructure and associated earthworks in the National Grid Yard and Gas Transmission Pipeline Corridor</p> <p>1. Activity status: Permitted</p> <p>a. Within the National Grid Yard the infrastructure is not for the reticulation and storage of water for irrigation purposes; and</p> <p>b. Any earthworks within the National Grid Yard do not:</p> <p>i. Exceed 300mm in depth within 6m of the outer visible edge of a tower support structure;</p> <p>ii. Exceed 3m in depth between 6m and 12m of the outer visible edge of a tower support structure; and</p>	While the regulation of earthworks undertaken by Transpower in relation to the National Grid are regulated by the NESETA (which prevail over any district plan rule), Transpower supports the clarification statement sought as it applies to the National Grid.	Allow	That part of the submission that relates to the National Grid, be allowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>iii. Result in a reduction of the existing conductor clearance distances.</p> <p>c. Any earthworks within the Gas Transmission Pipeline Corridor do not exceed 400mm in depth.</p> <p>Note:</p> <p>1. To avoid doubt, all other rules in this table also apply to any infrastructure within the National Grid Yard and Gas Transmission Pipeline Corridor.</p> <p>2. This rule does not apply to the owners and occupiers of the National Grid Yard and Gas Transmission Pipeline Corridor.</p> <p>Reasoning:</p> <p>Supports this rule in principle which restricts the extent of earthworks associated with the operation, maintenance and repair, upgrading and removal of existing infrastructure which can be undertaken as a permitted activity within the National Grid Yard and Gas Transmission Pipeline Corridor. Seek an amendment so that it does not apply to the owners and occupiers of the National Grid Yard and Gas Transmission Pipeline Corridor.</p>			
Natural Environment Values: ECO-Ecosystems and Indigenous Biodiversity						
Royal Forest and Bird Protection Society 225.148	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: ECO - Ecosystems and Indigenous Biodiversity - New Provision</p> <p>Add a new ECO objective as follows:</p> <p><i>The District's indigenous biodiversity is maintained and enhanced.</i></p> <p>Reasoning:</p> <p>Council has a function to maintain indigenous biodiversity which extends beyond SNAs.</p>	Transpower does not support the provision of a policy that directs the maintenance and enhancement of all indigenous biodiversity. Such a requirement extends beyond section 6(c) of the RMA.	Disallow	The whole of the submission point be disallowed.
Royal Forest and Bird Protection Society 225.166	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: ECO - Ecosystems and Indigenous Biodiversity - New provision</p> <p>Add new rule applying to All Zones as follows or similar:</p> <p><i>Indigenous vegetation removal outside of the Significant Natural Area Overlay</i></p> <p>1. <u>Activity status: Permitted</u></p> <p><u>Where</u></p> <p>a. <u>The indigenous vegetation removal is for the following purposed:</u></p> <p>i. <u>To address an imminent threat to people or property represented by deadwood, diseased or dying vegetation and ECO-S1 complied with:</u></p> <p>ii. <u>For the operation or maintenance of lawfully established buildings, infrastructure, walking or cycling private vehicle access or fences or existing farming activities:</u></p> <p>iii. <u>For the construction of new buildings, infrastructure, walking cycling or private vehicle access or fences outside of any ONFL and HNC overlays within the coastal environment; and</u></p> <p>b. <u>the indigenous vegetation removal does not exceed:</u></p> <p>i. <u>100m2 within the coastal environment; or</u></p>	As outlined in its original submission, the NESETA provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. Of specific relevance to Transpower, the new provision b) sought in submission point 225.166 would potentially change the activity status of the proposal that was otherwise permitted under the notified plan and therefore permitted under the NESETA. On that basis Transpower is opposed to the sought rule because:	Disallow	That part of the submission point that would apply to the National Grid, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>ii. <u>200m2 beyond the coastal environment,</u> <u>Per title as of (date or decision), or beyond 5m of the national grid</u></p> <p>2. <u>Activity status: Restricted discretionary</u> <u>Where:</u> a. <u>Compliance is not achieved with 1a and b.</u> <u>Matters of discretion are restricted to:</u></p> <p>1. <u>The extent to which the trimming or removal of indigenous vegetation avoids the loss, damage or disruption to the ecological processes, functions and integrity; and</u></p> <p>2. <u>The extent to which adverse effects are avoided, remedies or mitigated on indigenous biodiversity values which meet the criteria for significance by applying Policy 23 of the RPS; and</u></p> <p>3. <u>Adverse effects on receiving environments, including wetlands and the coastal environment; and</u></p> <p>4. <u>The use of alternative locations for the activity for which removal of vegetation is purposed to be undertaken.</u></p> <p>Reasoning: <i>The plan fails to implement councils functions to maintain indigenous biodiversity or provide for the protection of significant indigenous biodiversity values which outside of SCHED7 SNAs.</i></p>	<p>infrastructure would be addressed within clause a) (i.e. are upgrades considered operation or maintenance or construction?)</p> <p>ii. The scale of the application of the rule is extensive and it is not clear from the submission whether a s32 evaluation has been undertaken in terms of whether the method is the most efficient and effective means to give effect to the objectives. The submission references (paragraph 48) "the number of the areas of significant indigenous vegetation and significant habitats of indigenous fauna that will have been missed in that first survey - i.e. were never picked up in the Wildlands desktop analysis. It is therefore inappropriate to limit protections to only those areas identified in SCHED7. Provision is required to continue to add sites to the schedule and to protect significant values outside these areas through consenting processes." Transpower has concerns that the purported inadequacy of the SNA assessment is the reason for imposing a very restrictive and wide-reaching rule within the proposed plan. The proposed provision does not give sufficient certainty to landowners and would be difficult to interpret and apply. For example, how would a plan user calculate the 200m2 and should it contain a mixture of indigenous and non-indigenous vegetation? How does the rule apply to rural areas, and non pest species which are otherwise invasive?</p>		
Greater Wellington Regional Council 137.54	Fleur.Matthews@gw.govt.nz	Oppose	<p>Plan Provision: ECO - Ecosystems and Indigenous Biodiversity - General <i>Amend rules in the Chapter to change 'indigenous vegetation' to 'vegetation'.</i></p> <p>Reasoning: <i>Rule ECO-R2 makes the removal of any non-indigenous vegetation a permitted activity in SNAs. This is not appropriate in these areas and the rule should be removed. The removal of pest plants is already permitted under rule ECO-R3.1a(ii). An nonindigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna. Familiar examples of non-indigenous vegetation providing significant habitats for indigenous species in New Zealand include shag roosting and nesting colonies in coastal and riverine macrocarpa trees; willows, poplars, and other non-indigenous trees providing roosting habitat for bats; kiwi feeding and nesting with nonindigenous pine plantations; and non-indigenous grassland providing habitat for indigenous lizards. Non-indigenous vegetation within SNAs should be protected and any removal assessed as per the removal of indigenous vegetation regulated under</i></p>	<p>As outlined in its original submission, the NESETA provides prevailing provisions for the maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid. Under the NESETA Regulation 30, removal of any vegetation is permitted where it is not subject to a rule or within a natural area. The proposed plan also provides the ECO chapter rules do not apply to infrastructure. The amendment sought by the submitter would result in the removal of non-indigenous vegetation being subject to proposed rule ECO-R1 (although without specific relief the exact changes sought are not clear). The relief sought by the submitter would have wide application and its impact on the National Grid is not clear given other submission points have sought amendment to the relationship between chapters within the proposed plan.</p> <p>Transpower has general concerns with the workability of the proposed rule and impact and its application in respect of infrastructure activities and on this basis seeks the submission point be disallowed.</p>	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<i>the rules in this Chapter. The other rules in the Chapter should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. This is the approach taken, for example, under the Auckland Unitary Plan (chapter E15).</i>			
Royal Forest and Bird Protection Society 225.167	a.geary@forestandbird.org.nz	Oppose	<p>Plan Provision: ECO - Ecosystems and Indigenous Biodiversity - ECO-R1 Amend rule ECO-R1 as follows: <u>ECO-R1 Minor rRemoval of indigenous-vegetation within a Significant Natural Area Overlay</u> 1. Activity status: Permitted Where: a. The trimming or removal of indigenous-vegetation is to: i. Address an imminent threat to people or property represented by deadwood, diseased or dying vegetation and ECO-S1 is complied with; ii. Ensure the safe and efficient operation of any lawfully established formed public road, rail corridor or access, where removal is limited to within the formed width of the road, rail corridor or access; iii. Enable the maintenance of lawfully established buildings where the removal of indigenous vegetation is limited to within 3m from the external wall or roof of a building; iv. Maintain lawful established walking and cycle tracks where the trimming or removal of vegetation is within 1m of the formed track, upgrade or create new public walking or cycling tracks up to 2.5m in width undertaken by Porirua City Council or its approved contractor in accordance with the Porirua City Council Track Standards Manual (Version 1.2, 2014) and where no tree with a trunk greater than 15cm in diameter (measured 1.4m above ground) is removed; x. ii. <u>Maintain other existing infrastructure or renewable electricity generation activity and the trimming or removal is within 1m of the infrastructure;</u> v. Construct new perimeter fences for stock or pest animal exclusion from areas or maintenance of existing fences provided the area of trimming or removal of any vegetation is within 1m of the fence does not exceed 2m in width; vi. Enable necessary maintain lawfully established existing flood protection or natural hazard control where works are undertaken by a Statutory Agency or their nominated contractors or agents on their behalf as part of natural hazard mitigation works; Comply with section 43 of the Fire and Emergency Act 2017; or viii. Enable tangata whenua to exercise traditional customary harvesting; <u>b. is not within a natural wetland.</u></p> <p>2. Activity status: Restricted discretionary Where: a. Compliance is not achieved with ECO-R1-1.a. <u>or</u> b. <u>The activity is the upgrade or construction of a new public walking or cycling track up to 2.5m in width undertaken by Porirua City Council or its approved</u></p>	<p>As notified, the ECO rules do not apply to the National Grid (on the basis the rules do not apply to infrastructure). The relief sought by the submitter in terms of its impact on the National Grid is not clear given other submission points have sought amendment to the relationship between chapters within the proposed plan (the result being that the ECO rules could apply to the National Grid). If the ECO rules were to apply, the sought clause "Maintain other existing infrastructure or renewable electricity generation activity and the trimming or removal is within 1m of the infrastructure" would result in the rule applying to the National Grid and therefore if the standard is not complied with, consent would be required under Regulation 31 of the NESETA. Transpower has general concerns with the workability of the proposed rule and impact, and its application in respect of infrastructure activities. For example, reference to a 1m setback is not clear in its application and would not be sufficient to enable trimming to ensure the ongoing operation and maintenance of the National Grid, including Transpower's obligations under the Electricity (Hazards from Trees) Regulations 2003 . The application of the rule to the National Grid would mean Regulation 31 or 32 of the NESETA would apply, should the 1m standard be triggered. Transpower's preference is for the INF rules to apply (as sought to be amended in its submission) in considering the activity status under the NESETA.</p> <p>On this basis Transpower seeks the submission point be disallowed in respect of the sought clause: "Maintain other existing infrastructure or renewable electricity generation activity and the trimming or removal is within 1m of the infrastructure".</p>	Disallow	That part of the submission that relates/impacts on the National Grid, be disallowed, in particular the sought clause: "Maintain other existing infrastructure or renewable electricity generation activity and the trimming or removal is within 1m of the infrastructure".

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p><u>contractor in accordance with the Porirua City Council Track Standards Manual (Version 1.2, 2014); or</u> <u>c. The activity is the construct new perimeter fences for stock or pest animal exclusion from areas or maintenance of existing fences provided the area of trimming or removal of any vegetation does not exceed 2m in width.</u></p> <p>Matters of discretion are restricted to: 1. <u>The extent to which the trimming or removal of indigenous vegetation avoids the loss, damage or disruption to the ecological processes, functions and integrity of the Significant Natural Area; and</u> 2. <u>Effects on the values of the Significant Natural Area The matters in ECO- P2; and</u> 23. <u>effects of receiving environments, including wetlands and the coastal environment The matters in ECO-P4;</u> 4. <u>the use of alternative locations outside of the SNA including for connectivity with existing or planned walking and cycling facilities.</u></p> <p>Section 88 information requirements for applications...</p> <p>Reasoning: Supports in principle the permitted activity classification to provide for health and safety and enable maintenance of lawful structures and infrastructure where this is within limits and of a scale to ensure effects would be no more than minor. Where effects are likely to be more than minor a consenting process is appropriate for site specific considerations and whether consent can be granted with appropriate conditions. The plan currently fails to include a general vegetation clearance rule which is necessary to set a threshold for assessments of indigenous biodiversity values as to significance and maintenance of indigenous biodiversity. The development of new or upgrades to walking or cycling tracks and new fences can have more than minor effects and requires site specific considerations by way of consent application. Given that non-native vegetation can have significant habitat value for fauna, it is inappropriate to restrict the rules to managing indigenous vegetation only. Furthermore, unrestricted removal of exotic vegetation within an SNA may have adverse effects on the remaining indigenous vegetation. Restricting discretion to specific policies or the matters within specific policies is uncertain in terms of matters that are addressed in other policies, for example wetlands under P5, earthworks under P11, pests which are not specifically recognized in the proposed policy wording, restoration activities achieving the objectives of the Plan. The discretions listed adjacent ECO-S1 are not captured in the matters discretion under the rule which make the rule uncertain. There is a need to include a matter of discretion to consider the location of the activities in terms of whether it is necessary or appropriate to be located within the SNA in terms of wider connectivity's or alternative options beyond the SNA. It may not be necessary to apply the full P2 hierarchy. That approach detracts from a preference to avoid adverse effects.</p>			
Subdivision: SUB- Subdivision						

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
Kāinga Ora – Homes and Communities 81.466	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: SUB - Subdivision - SUB-R15</p> <p><i>Delete SUB-R15</i></p> <p>All Zones:</p> <p>1. <i>Activity status: Restricted discretionary</i></p> <p>Where:</p> <p>a. <i>A proposed building platform is identified for each proposed allotment that is capable of accommodating</i></p> <p>b. <i>building which is located entirely outside of the National Grid Yard and National Grid Pāuatahanui Substation Yard.</i></p> <p>Matters of discretion are restricted to:</p> <p>1. <i>The matters in INF-P5.</i></p> <p>2. <i>Activity status: Non-complying</i></p> <p>Where:</p> <p>a. <i>Compliance is not achieved with SUB-R15 1.a</i></p> <p>Reasoning:</p> <p><i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed.</p> <p>The purpose of the subdivision provisions within the proposed plan are to manage subdivision in the National Grid Corridor to ensure that the long-term maintenance, operation and development of the National Grid is not compromised. Subdivision is 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. 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).</p> <p>The proposed plan provisions provide for subdivision within the National Grid Subdivision Corridor as a restricted discretionary activity where a building platform is able to be accommodated outside the National Grid Yard. The restricted discretionary activity status for subdivision provides an appropriate incentive to design subdivision layouts that avoid building sites within the National Grid Yard. Importantly, it also provides for Transpower input into the subdivision proposal process and provides the ability for council to decline an application. Additionally, the activity classification provides clear guidance for applicants and the Council to ensure the design of subdivision manages the effects of the network on the future use of the subdivided land and the effects of that land use on the network. Specific examples where development has occurred that poses a risk to the secure and efficient operation of the National Grid include:</p> <p>(a) Towers being ring fenced by dwellings creating risks, compromising access and the ability to maintain and develop the line;</p> <p>(b) Development being surrounded by transmission lines restricting vehicle access to the line and tower to undertake maintenance works; and</p> <p>(c) Earthworks around a tower.</p> <p>Based on the above and that no clear reasoning has been provided as to the rationale for deleting the National Grid provisions, including the subdivision provisions, the submission point is opposed. It is not clear from the submission how the NPSET, and in particular policies 10 and 11, would be given effect to through the relief sought.</p>	Disallow	That the whole of the submission point be disallowed.
General District-Wide Matters: EW-Earthworks						

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
Kāinga Ora – Homes and Communities 81.482	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: EW - Earthworks - EW-O1 <i>Amend EW-O1</i> <i>Earthworks are undertaken in a manner that:</i></p> <ol style="list-style-type: none"> 1. <i>Is consistent with the anticipated scale and form of development for the zone;</i> 2. <i>Minimises adverse effects on visual amenity values, including changes to the appearance of natural landforms;</i> 3. <i>Minimises erosion and sediment effects beyond the site and assists to protect receiving environments, including Te Awarua-o- Porirua Harbour;</i> 4. <i>Protects the safety of people and property; an</i> 5. <i>Minimises adverse effects on the National Grid and the Gas Transmission Pipeline.</i> <p>Reasoning: <i>Kāinga Ora generally supports this objective but seeks an amendment to be more specific with regard to the effect being managed. Kāinga Ora consider "visual amenity values" is too vague in the context of earthworks assessment. Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under.</i></p>	<p>Earthworks are activities that can compromise the National Grid and are a form of development contemplated by the NPSET that should be regulated under Policy 10.</p> <p>Objective EW-O1 as notified provides a policy framework for allowing certain earthwork activities which do not compromise the National Grid.</p> <p>As outlined in Transpowers further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationalise for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.</p>	Disallow	That part of the submission that relates to the National Grid, be disallowed
Waka Kotahi NZ Transport Agency 82.164	Claudia.Jones@nzta.govt.nz Consentsandapprovals@nzta.govt.nz	Oppose	<p>Plan Provision: EW - Earthworks EW-O1 <i>Amend provision EW-O1</i> <i>Earthworks are undertaken in a manner that:</i></p> <ol style="list-style-type: none"> 4. <i>Protects the safety of people, and property and infrastructure; and</i> 5. <i>Minimises Mitigates adverse effects on the National Grid and the Gas Transmission Pipeline infrastructure.</i> <p>Reasoning: <i>Generally supports this objective as it ensures appropriate consideration of the effects from earthworks. Seeks the consideration of the effects of earthworks to be broadened to include the safety of all infrastructure.</i></p>	In its submission to Objective EW-O1 Transpower sought amendment to provide a differing policy directive for the National Grid whereby earthworks which compromise the National Grid are avoided. On the basis the National Grid is otherwise appropriately addressed, Transpower is neutral on the amendment sought to clause 5.	Disallow	That part of the submission that relates to the National Grid, be disallowed.
Kāinga Ora – Homes and Communities 81.486	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Support	<p>Plan Provision: EW - Earthworks EW-P4 <i>Delete EW-P4:</i> <i>Enable earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor where they 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 the Gas Transmission Network.</i></p> <p>Reasoning:</p>	<p>While Transpower does not support the reasoning provided for the relief sought to delete EW-P4, on the basis the relief sought reflects that sought by Transpower in its original submission (for the deletion of the policy) it has no objection to the deletion of EN-P4.</p> <p>It is Transpower's position that EW-P4 as notified is not clear and EW-P5 provides a clearer policy directive in respect of the National Grid.</p>	Allow	That part of the submission that relates to the National Grid, be allowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<i>Kāinga Ora opposes this policy. The works that would be enabled through this policy can be adequately considered through EW-P5. Kāinga Ora also opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i>			
Kāinga Ora – Homes and Communities 81.487	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: EW - Earthworks - EW-P5 Amend EW-P5</p> <p>Only allow earthworks Provide for earthworks within the National Grid Yard and the Gas Transmission Pipeline Corridor where it can be demonstrated that the safe and efficient functioning, operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Network will not be compromised, taking into account:</p> <ol style="list-style-type: none"> 1. The extent to which the earthworks may compromise the safe access to and operation, maintenance and repair, upgrading and development of the National Grid or the Gas Transmission Pipeline; 2. The stability of land within and adjacent to the National Grid or the Gas Transmission Pipeline Corridor; 3. Risks relating to health or public safety, including the risk of property damage; and 4. Technical advice provided by the owner and operator of the National Grid or the Gas Transmission Network. <p>Reasoning: <i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid</i></p>	<p>Earthworks are activities that can compromise the National Grid and are a form of development contemplated by the NPSET that should be regulated under Policy 10.</p> <p>Policy EW-P5 as notified provides a policy framework for allowing certain earthwork activities which do not compromise the National Grid. In its submission Transpower sought amendment to Policy EW-P5 to reflect the strong policy direction within Policy 10 of the NPSET.</p> <p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. The relief sought in submission point 81.487 seeks deletion of all reference to the National Grid within the policy. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policy 10 of the NPSET would be given effect to through the relief sought.</p>	Disallow	That the whole of the submission point be disallowed.
Kāinga Ora – Homes and Communities 81.491	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: EW - Earthworks - EW-R4 Delete EW-R4</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Earthworks must not:</p> <ol style="list-style-type: none"> i. Exceed 300mm in depth within 6m of the outer visible edge of a tower support structure; ii. Exceed 3m in depth between 6m and 12m of the outer visible edge of a tower support structure; and 	<p>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 the ability to operate it.</p> <p>Transpower supports the provision of standards specific to earthworks on the basis such activities can compromise the National Grid and are a form of development contemplated by the NPSET. Specifically, earthworks restrictions are supported as earthworks have the potential to undermine transmission line structures, generate dust, reduce the clearances between the ground and conductors. They also have the potential to restrict Transpower's</p>	Disallow	That the whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>ii. Result in a reduction of the existing conductor clearance distances.</p> <p>2. Activity status: Restricted discretionary</p> <p>Where</p> <p>a. Compliance is not achieved with EW-R4 1.a.</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in EW-P5.</p> <p>Notification</p> <ul style="list-style-type: none"> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, the Council will give specific consideration to any adverse effects on Transpower New Zealand Limited. <p>Reasoning:</p> <p>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</p>	<p>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>While the intent of Rule EW-R4 was supported, in its submission Transpower sought amendment to Rule EW-R4 to clarify the rule and also recognise that the risks to the National Grid extend beyond those addressed by NZECP34.</p> <p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid earthwork provisions and it is not clear from the submission how Policy 10 of the NPSET would be given effect to through the relief sought.</p>		
Part 3: Area Specific Matters						
Residential Zone: GRZ – General Residential Zone						
Kāinga Ora – Homes and Communities 81.542	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: GRZ – General Residential Zone – GRZ-R5</p> <p>Delete GRZ-R5</p> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Where the building or structure is a fence that is no greater than 2m in height and is located no closer than:</p> <p>i. 6m from the outer visible edge of a foundation of a National Grid transmission line tower; or</p> <p>ii. 5m from the outer visible edge of a foundation of a National Grid transmission line pole; or</p> <p>b. The building or structure is an accessory building that is associated with an existing residential activity and is less than 10m² in area and 2.5m in height; and</p> <p>c. Any alterations to an existing building or structure that is used for a sensitive activity do not increase the building or structure height or footprint.</p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.</p>	Disallow	That the whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p><i>Note</i></p> <p><i>To avoid doubt, GRZ R1 also applies</i></p> <p><i>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. Activities should be checked for compliance even if they are permitted by the District Plan.</i></p> <p><i>2. Activity status: Non-complying</i></p> <p><i>Where:</i></p> <p><i>a. Compliance is not achieved with GRZ R5-1.a, GRZ R5-1.b, or GRZ R5-1.c.</i></p> <p><i>Notification</i></p> <p><i>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, Porirua City Council will give specific consideration to any adverse effects on Transpower.</i></p> <p>Reasoning:</p> <p><i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended.</i></p> <p><i>Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</i></p>			
Kāinga Ora – Homes and Communities 81.551	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: GRZ – General Residential Zone – GRZ-R14</p> <p><i>Delete GRZ-R14</i></p> <p><i>1. Activity status: Permitted</i></p> <p><i>Where</i></p> <p><i>a. The activity is not a sensitive activity</i></p> <p><i>2. Activity status: Non-complying</i></p> <p><i>Where:</i></p> <p><i>a. Compliance is not achieved with GRZ-R14-1.a.</i></p> <p><i>Notification</i></p> <p><i>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, Porirua City Council will give specific consideration to any adverse effects on Transpower.</i></p> <p>Reasoning:</p> <p><i>Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions)</i></p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.	Disallow	That the whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.			
Residential Zones: MRZ-Medium Density Residential Zone						
Kāinga Ora – Homes and Communities 81.580	developmentplanning@hnzc.co.nz kwilliams@proptertygroup.co.nz	Oppose	<p>Plan Provision: MRZ - Medium Density Residential Zone – General</p> <p>Kāinga Ora seeks consequential changes consistent with its overall submission on the Plan. Key areas of concern are (but not limited to):</p> <ol style="list-style-type: none"> 1. Inclusion of an additional objective and policy to reflect that amenity values should reflect the planned urban built form and that this expected to change over time; 2. Deletion of reference to Design Guides and requirement that development be “consistent” with these to achieve compliance; 3. Review and re-drafting of notification exclusion clauses; 4. Removal of provisions specific to “multi-unit housing” and integration within policies, rules and standards more generally; 5. Amendment to the spatial extent of the MRZ in accordance with NPS-UD direction and zoning principles of Kāinga Ora; 6. Change language to align with NPS-UD - “planned built urban form” in anticipation of changing character and associated amenity values; 7. Amend provisions with direct ‘avoid’ statements. This needs to be qualified in light of the King Salmon meaning of ‘avoid 8. Incorporate height variation controls to areas of the MRZ where additional height is appropriate, to reflect NPS-UD; 9. Consequential amendments to reflect changes sought specific to eastern Porirua (including zoning changes); and 10. Consequential changes to the numbering of provisions following changes sought throughout chapter. <p>Reasoning:</p> <p>Consistent with its overall submission on the PDP, Kāinga Ora seeks an increased spatial extent of the MRZ throughout Porirua City. Consistent with its overall submission on the PDP, Kāinga Ora opposes the inclusion of Design Guides as statutory elements within the PDP, and policies and matters of discretion that require proposals to be “consistent with” these guides. Kāinga Ora would support an approach whereby the Council’s Urban Design Guides are nonstatutory tools that sit outside the District Plan. These can be referred to as method/tool that provides best practice guidance regarding an acceptable means of satisfying matters of discretion/assessment. Consistent with its wider submission, Kāinga Ora seeks further enabling height limits, both within the Eastern Porirua Residential Intensification Precinct generally, and in locations where the MRZ is within a walkable catchment of the City Centre and/or a Rapid Transit Stop, as directed by the NPS-UD.</p> <p>Consistent with its wider submission, Kāinga Ora opposes the definition of “multi-unit</p>	Transpower opposes the relief sought in points 5. and 7. Specific to the use of ‘avoid’ within the PDP, Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid. Transpower would oppose any amendments which do not give effect to the NPSET.	Disallow	That part of the submission (specifically clause 5 and 7 of the relief sought) that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>housing" and associated rule framework. Consequential amendments are sought throughout to reflect necessary changes.</p> <p>Amendments are sought throughout this chapter to align language with the NPS-UD, which refers to the "planned urban built form" when referring to the intended future state of the urban environment. Amendments are also sought to simplify the provisions</p>			
Rural Zones: GRUZ-General Rural Zones						
Kāinga Ora – Homes and Communities 81.643	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: GRUZ - General Rural Zone - Multiple provisions; National Grid</p> <p>Kāinga Ora seeks amendments consistent with its overall submission on the Plan. Key areas of concern are (but not limited to):</p> <ol style="list-style-type: none"> 1. Deletion of provisions relating to the National Grid 2. Amend provisions with direct 'avoid' statements. This needs to be qualified in light of the King Salmon meaning <p>Reasoning:</p> <p>Kāinga Ora generally supports the chapter as proposed. Kāinga Ora seeks consequential amendments, consistent with its overall submission on the PDP</p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.</p> <p>Specific to the use of 'avoid' within the PDP, Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid. Transpower would oppose any amendments which do not give effect to the NPSET.</p>	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.
Rural Zones: RLZ-Rural Lifestyle Zone						
Kāinga Ora – Homes and Communities 81.644	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: RLZ - Rural Lifestyle Zone - Multiple provisions; National Grid</p> <p>Kāinga Ora seeks amendments consistent with its overall submission on the Plan. Key areas of concern are (but not limited to):</p> <ol style="list-style-type: none"> 1. Deletion of provisions relating to the National Grid 2. Amend provisions with direct 'avoid' statements. This needs to be qualified in light of the King Salmon meaning <p>Reasoning:</p> <p>Kāinga Ora generally supports the chapter as proposed. Kāinga Ora seeks consequential amendments, consistent with its overall submission on the PDP</p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.</p> <p>Specific to the use of 'avoid' within the PDP, Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid. Transpower would oppose any amendments which do not give effect to the NPSET.</p>	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.
Rural Zones: SETZ- Settlement Zone						
Kāinga Ora – Homes and Communities 81.645	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	<p>Plan Provision: SETZ - Settlement Zone - Multiple provisions; National Grid</p> <p>Kāinga Ora seeks amendments consistent with its overall submission on the Plan. Key areas of concern are (but not limited to):</p> <ol style="list-style-type: none"> 1. Deletion of provisions relating to the National Grid 2. Amend provisions with direct 'avoid' statements. This needs to be qualified in light of the King Salmon meaning <p>Reasoning:</p> <p>Kāinga Ora generally supports the chapter as proposed. Kāinga Ora seeks consequential amendments, consistent with its overall submission on the PDP</p>	<p>For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.</p> <p>Specific to the use of 'avoid' within the PDP, Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid. Transpower would oppose any amendments which do not give effect to the NPSET.</p>	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
Open Spaces and Recreation Zones: OSZ-Open Space Zone						
Kāinga Ora – Homes and Communities 81.812	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	Plan Provision: OSZ - Open Space Zone - Multiple provisions; National Grid <i>Kāinga Ora seeks the following amendments consistent with its overall submission on the Plan.</i> 1. <i>Review and redrafting of the full package of provisions (objectives, policies, rules and definitions) in relation to the National Grid.</i> Reasoning: <i>Kāinga Ora generally supports the chapter as proposed. Kāinga Ora seeks consequential amendments, consistent with its overall submission on the PDP.</i>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.	Disallow	The whole of the submission point be disallowed.
Special Purpose Zone: FUZ-Future Urban Zone						
Kāinga Ora – Homes and Communities 81.815	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	Plan Provision: FUZ - Future Urban Zone - Multiple provisions; National Grid; Notification preclusion <i>Kāinga Ora seeks consequential changes consistent with its overall submission on the PDP. Key areas of concern are (but not limited to):</i> 1. <i>Review and re-drafting of notification exclusion clauses;</i> 2. <i>Amend provisions with direct 'avoid' statements. This needs to be qualified in light of the King Salmon meaning of 'avoid';</i> 3. <i>Review and redrafting of the full package of provisions (objectives, policies, rules and definitions) in relation to the National Grid.</i> 4. <i>Consequential changes to the numbering of provisions following changes sought throughout chapter.</i> Reasoning: <i>Kāinga Ora generally supports the Future Urban Zone and spatial extent as proposed. Consistent with its overall submission Kāinga Ora seeks revised wording of the standard notification clauses so that they clearly deliver the intended benefit of the tool, redrafting of the full package of objectives, policies and rules in relation to the National Grid and refraining from using the term avoid.</i>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought. Specific to the use of 'avoid' within the PDP, Transpower opposes the submission point in so far as it applies to provisions relating to the effect of activities on the National Grid. Transpower would oppose any amendments which do not give effect to the NPSET.	Disallow	That part of the submission that would impact on National Grid provisions within the proposed plan, be disallowed.
Kāinga Ora – Homes and Communities 81.826	developmentplanning@hnzc.co.nz kwilliams@propertygroup.co.nz	Oppose	Plan Provision: FUZ - Future Urban Zone - FUZ-R2, National Grid <i>Delete FIZ-R2</i> 1. <i>Activity status: Permitted—</i> Where: a. <i>The building or structure is a non-habitable farm or horticulture structure or building or a stockyard or platform ancillary to milking/dairy sheds (excluding commercial greenhouses, wintering barns, produce packing facilities and milking/dairy sheds);</i> b. <i>The building or structure is a fence that is no greater than 2.5m in height and is located no closer than</i> i. <i>6m from the outer visible edge of a foundation of a National Grid transmission line tower; or</i>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission how policies 10 and 11 of the NPSET would be given effect to through the relief sought.	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
			<p>ii. 5m from the outer visible edge of a foundation of a National Grid transmission line pole; or</p> <p>c. The building or structure is an artificial crop support structure is no greater than 2.5m in height and is located at least 8m from a National Grid transmission line pole.</p> <p>d. The building or structure is an accessory building that is associated with d and existing residential activity and is less than 10m² in area and 2.5m in height; and</p> <p>e. Any alterations to an existing building or structure that is used for a sensitive activity do not result in an increase to the building or structure height or footprints</p> <p>Note</p> <ul style="list-style-type: none"> To avoid doubt, FUZ-R1 also applies. 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. Activities should be checked for compliance even if they are permitted by the District Plan. <p>2. Activity status: Non-complying Where a. Compliance is not achieved with FUZ-R2-1.a, FUZ-R2-1.b, FUZ-R2-1.c, FUZ-R2-1.d, or FUZ-R2-1.e.</p> <p>Notification:</p> <ul style="list-style-type: none"> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. <p>When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, the Council will give specific consideration to any adverse effects on Transpower.</p> <p>Reasoning: Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended.</p> <p>Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</p>			
Kāinga Ora – Homes and Communities	developmentplanning@hnzc.co.nz	Oppose	<p>Plan Provision: FUZ - Future Urban Zone FUZ-R13; National Grid</p> <p>Delete FUZ-R13</p> <p>1. Activity status: Permitted</p> <p>Where:</p>	For the reasons outlined in Transpower's further submission point on submission point 81.936, the submission point is opposed. No clear reasoning has been provided as to the rationale for deleting the National Grid provisions and it is not clear from the submission	Disallow	The whole of the submission point be disallowed.

Transpower's further submission:						
Submitter Name/ Submission Number and Point	Submitter Address/Email	Support or Oppose	The particular parts of the submission Transpower support or oppose (as derived from the summary of submissions) are:	The reasons for Transpower's support or opposition are:	Allow or disallow	Transpower seeks that the whole or part of the submission be allowed / disallowed
81.837	kwilliams@propertygroup.co.nz		<p>a. The activity is not a sensitive activity.</p> <p>2. Activity status: Non-complying</p> <p>Where:</p> <p>Compliance is not achieved with FUZ R13 1.a.</p> <p>Notification:</p> <ul style="list-style-type: none"> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA. When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, the Council will give specific consideration to any adverse effects on Transpower. <p>Reasoning: Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) including the spatial extent of the overlay shown in the PDP is amended. Kāinga Ora acknowledges the need for the PDP to give effect to the requirements of the National Policy Statement for Electricity Transmission (2008). However, the proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid.</p>	how policies 10 and 11 of the NPSET would be given effect to through the relief sought.		