

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	General /General /General	99.1	Amend	It is not clear how conflicts between overlays and district wide provisions are to be managed eg the National Grid and its relationship to the Network Utilities and overlay provisions	Amend the text as follows: An overlay spatially identifies distinctive values, risks or other factors which require management in a different manner from the underlying zone provisions. Where there is a conflict between the zone and the overlay, the overlay provisions prevail. <u>Where there is conflict between the network utility chapter provisions and the overlay, the network utility chapter provisions prevail.</u> And any consequential amendments.
Transpower New Zealand Limited	Definitions /Definitions /EARTHWORKS	99.2	Support	Support definition as it is consistent with the National Planning Standard.	Retain the definition.
Transpower New Zealand Limited	Definitions /Definitions /ELECTRICITY TRANSMISSION	99.3	Support	Definition supported on the basis it will assist with plan interpretation in providing clarity as to the assets forming part of the National Grid.	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /FUNCTIONAL NEED	99.4	Support	Support definition as it reflect the National Planning Standard.	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /OPERATIONAL NEED	99.5	Support	Definition is supported as it reflects the National Planning Standard.	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /INFRASTRUCTURE	99.6	Support	The definition reflects that provided in the RMA and is therefore supported.	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /LAND DISTURBANCE	99.7	Support	The definition reflects that provided in the National Planning Standards and is therefore supported.	Retain the definition.
Transpower New Zealand Limited	Definitions /Definitions /NATIONAL GRID	99.8	Support	The definition is supported on the basis it will assist with plan interpretation in providing clarity as to the assets forming part of the National Grid.	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /NATIONAL GRID SUBDIVISION CORRIDOR	99.9	Amend	An amendment is sought to reflect the need to allow for cable swing during high winds, and to reflect the existing transmission assets within the district (being 110kv and 220kv lines both on towers). There are no poles or pi-poles in the city (noting the extent of actual assets within Napier is very limited). Amendment is sought to clarify how to measure the setbacks.	Amend the definition as follows: NATIONAL GRID SUBDIVISION CORRIDOR the area measured either side of the centreline of above ground National Grid line (identified on the planning maps as "Napier Transmission Lines") as follows: <ul style="list-style-type: none"> • 14m for 110kV national grid lines on single poles • 32m for 110kV transmission lines on towers <ul style="list-style-type: none"> * 37m for 220kV transmission lines The National Grid Subdivision Corridor and National Grid Yard do not apply to underground cables or any underground transmission lines (or sections of line) that are designated by Transpower. The measurement of setback distances from National Grid lines is to be taken from the centre line of the <u>transmission line and the outer edge of the two support structures. The centre line at any point is straight line between the centre points of the two support structures</u> at each end of the span

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Transpower New Zealand Limited	General Approach / /	99.10	Amend	General statement noting background information that provides context to submission points.	Amend or support as noted in each submission point and a outlined in full submission
Transpower New Zealand Limited	Definitions /Definitions /NATIONAL GRID YARD	99.11	Amend	Transpower seeks amendment to the definition to reflect there are no poles in the district, amendment to make it clear but clauses a) and b) apply, and amendment to remove repetitive wording within the clauses.	Amend the definition and image as follows: NATIONAL GRID YARD means the area located within: a. 12 metres in any direction from the outer visible edge of a "National Grid" support structure foundation; and or b. the area located within 10m either side of the centreline of an overhead 110kV National Grid line on single poles; and or b. the area located within 12 metres either side of the centreline of any overhead "National Grid" transmission line on towers (including tubular steel towers where these replace steel lattice towers). The National Grid Yard does not apply to underground cables or any transmission lines (or sections of line) that are designated. The measurement of setback distances from National Grid lines shall be taken from the centre line of the 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
Transpower New Zealand Limited	Definitions /Definitions /NETWORK UTILITY OPERATOR	99.12	Support	The definition reflects that provided in the RMA and is therefore supported.	Retain the definition.
Transpower New Zealand Limited	Definitions /Definitions /OPERATIONAL NEED	99.13	Support	The definition reflects that provided in the National Planning Standards and is therefore supported.	Retain the definition.
Transpower New Zealand Limited	Definitions /Definitions /REVERSE SENSITIVITY	99.14	Support	Support the definition. The concept recognises the relationship between existing activities and incompatible new or altered activities.	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /SENSITIVE ACTIVITIES	99.15	Support	Support the definition, recognising that the definition applies in relation to a range of activities in the rural environment (not just the National Grid).	Retain the definition
Transpower New Zealand Limited	Definitions /Definitions /SIGNIFICANT NATURAL AREA	99.16	Support	Support definition.	Retain the definition
Transpower New Zealand Limited	SD - Overview /Overview	99.17	Support	Transpower supports the overview as it clarifies the role of the strategic directions.	Retain the overview to the Strategic Direction chapter
Transpower New Zealand Limited	SD - Overview /Overview /	99.18	Support	Supports the overview text as it clarifies the role of the strategic directions. The reference that there is no hierarchy is supported.	Retain the overview to the Strategic Direction chapter
Transpower New Zealand Limited	SD - Overview /Overview /	99.19	Support	Supports the overview as it clarifies the role of the strategic directions.	Retain the overview to the Strategic Direction chapter

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Transpower New Zealand Limited	SD - Transport and Infrastructure Provision /Introduction	99.20	Amend	Amendment is sought to recognise that for some infrastructure, such as the National Grid, coordination is not relevant or practicable.	Amend the introduction text as follows: Infrastructure is critical to the social, economic, and cultural wellbeing of people, and the ability for Napier to grow. Infrastructure must, therefore, be enabled and protected while ensuring that its effects on the environment are appropriately managed. To enable the city to grow, the delivery of infrastructure must be coordinated, <u>where relevant and practicable</u> , with the delivery of housing and business activities. The Council, infrastructure providers, the community, and developers will need to work together to achieve this. The strategic objectives set the direction for the District Plan and help to implement the Council's community outcomes set out in the Napier 30-Year Infrastructure Strategy and the Napier Transport Strategy.
Transpower New Zealand Limited	SD - Transport and Infrastructure Provision /Issues /SD-TI-13: Adverse effects arising from infrastructure	99.21	Amend	Amendment sought to the policy to clarify that functional and operational requirements are not confined only to the operation of infrastructure. The sought relief would give effect to NPSET Policy 3 which relates to all transmission activities.	Amend SD-TI-13 as follows: SD-TI-13: Adverse effects arising from infrastructure Infrastructure has functional and operational requirements necessary to its operation, <u>maintenance, upgrade and development</u> which may result in adverse effects on the environment. The quality of the environment and the well-being of people and communities are affected by choices about the management of infrastructure.
Transpower New Zealand Limited	SD - Transport and Infrastructure Provision /Issues /SD-TI-14: Significant infrastructure and reverse sensitivity	99.22	Amend	Amendment sought to recognise that the effects of activities are not confined to reverse sensitivity. Reference to 'not compromise' would give effect to NPSET policy 10. Transpower further notes the term 'significant infrastructure' is not defined in the PDP. In order to assist with plan interpretation, Transpower seeks specific reference to the National Grid or alternately, the inclusion of a specific definition.	Amend as follows: SD-TI-14: Significant infrastructure <u>and adverse effects</u> (including reverse sensitivity) Significant infrastructure (<u>which includes the National Grid</u>) also needs to be protected, where possible, from encroachment <u>and impacts</u> by incompatible activities that may <u>compromise the infrastructure</u> and result in reverse sensitivity effects.
Transpower New Zealand Limited	SD - Transport and Infrastructure Provision /Strategic Objectives /SD-TI-O1: Enabling infrastructure	99.23	Amend	Amendment sought to recognise that infrastructure can and does, provide benefits other than economic growth. The sought insertion of reference to benefits would give effect to NPSET Policy 1. A minor amendment is also sought to remove the 's' from networks to reflect that there is only one electricity transmission network in the city.	Amend as follows: SD-TI-O1: Enabling infrastructure Infrastructure that supports economic growth <u>and provides national, regional and local benefits</u> , including the port, airport, transportation, and electricity transmission networks, is enabled and protected.

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Transpower New Zealand Limited	SD - Transport and Infrastructure Provision /Strategic Objectives /SD-TI-O3: Managing adverse effects of infrastructure	99.24	Amend	Objective supported but queries whether the word 'technical' is required given the definition for 'operational need' and whether the objective should instead refer to 'functional and operational need'.	Retain the objective. However, Transpower does query whether the word 'technical' is required given the definition for 'operational need' and whether the objective should instead refer to 'functional and operational need'.
Transpower New Zealand Limited	SD - Transport and Infrastructure Provision /Strategic Objectives /SD-TI-O4: Significant infrastructure and reverse sensitivity	99.25	Amend	Recognition is sought that effects are not confined to reverse sensitivity but may also include effects that compromise the infrastructure. Such reference would give effect to NPSET policy 10. Transpower further notes the term "significant infrastructure" is not defined in the PDP. In order to assist with plan interpretation, Transpower seeks specific reference to the National Grid or alternately, the inclusion of a specific definition.	Amend as follows: SD-TI-O4: Significant infrastructure and reverse sensitivity Significant infrastructure (<u>which includes the National Grid</u>), operates efficiently and safely and is protected from incompatible development and activities that may <u>compromise the operation, maintenance and upgrade of significant infrastructure, and may create reverse sensitivity effects.</u>
Transpower New Zealand Limited	SD - Sustainability, Resilience, and Climate Change /Strategic Objectives /SD-SRCC-O6: Climate change adaptation	99.26	Amend	Amendment is sought to the objective to provide recognition of those activities which assist in reducing greenhouse gas emissions. Such recognition would give effect to Policy 1 of the NPSET, give effect to the National Adaptation Plan 2022, and the consultation drafts of the NPS-REG and NPS-ET in terms of recognising the benefits of avoiding, reducing, and displacing greenhouse gas emissions to help mitigate change. While the consultation documents are draft only, they provide a clear indication of future policy direction.	Amend as follows: SD-SRCC-O6: Climate change adaptation Land use, subdivision, and development design supports climate change adaptation, <u>and recognise and provide for those activities which assist in reducing greenhouse gas emissions.</u>
Transpower New Zealand Limited	SD - Transport and Infrastructure Provision / /	99.27	Amend	Support on the basis it gives effect to the NPSET and provides specific recognition in the PDP of the national significance of the National Grid.	Insert a new strategic direction as follows: <u>SD-TI-O5: National Grid</u> <u>The significance of the National Grid is recognised, and sustainable, secure and efficient electricity transmission is provided through and within the city.</u>
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities /	99.28	Amend	Transpower's preference is for the Network Utilities chapter to be entirely self-contained, so that other chapters in the plan do not apply to the National Grid. However, should this approach not be adopted, Transpower has made submissions on other chapters in the Proposed Plan to indicate what changes would be required, whether they are incorporated into the Network Utilities Chapter or remain in their current location.	Amend the Network Utilities Chapter so that it is self-contained, and reference to, and applicability of, other chapters is not required.

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Transpower New Zealand Limited	NU - Network utilities /Introduction	99.29	Amend	Transpower supports the text and specifically, the reference to electricity transmission. However additional text is sought to recognise the NPSET. Given that this is a National Policy Statement and the objective of that National Policy Statement, it is appropriate to include recognition of the National Grid in the introductory paragraphs.	<p>Amend the text as follows:</p> <p>The purpose of the Network Utilities chapter is to manage the operation, development, and maintenance of all network utilities. Network utilities are physical resources that include road and rail networks, cycleway and walkway networks, telecommunication networks, radio communication facilities, electricity and gas transmission and distribution networks, infrastructure service networks such as reticulated water, sewerage, trade waste and stormwater drainage networks, and ancillary activities including associated buildings, structures, equipment and customer connections.</p> <p><u>The importance of the National Grid has been recognised in the development of the National Policy Statement for Electricity Transmission 2008 (NPSET), the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 and the Regional Policy Statement. The NPSET provides that the district plan must recognise the national significance of the electricity transmission network (the National Grid) by facilitating its operation, maintenance, upgrading and development, while managing both the adverse effects of the network, and managing the adverse effects of other activities on the network.</u></p>
Transpower New Zealand Limited	NU - Network utilities /Introduction.	99.30	Amend	A minor amendment is sought to articulate that their upgrade and development is also important.	<p>Amend as follows:</p> <p>Network utilities are an essential part of the district’s infrastructure, and their efficient and effective supply, and maintenance, <u>upgrade and development</u> are important for enabling communities to undertake their everyday activities, for the functioning of the district, and for facilitating and maintaining the health, safety, and general wellbeing of its residents. It also aligns with a number of strategic objectives for the District Plan relating specifically to aligning infrastructure planning with land use planning, supporting economic growth, optimising connectivity, public health and safety, and consideration of the long-term risk of natural hazards and climate change.</p>
Transpower New Zealand Limited	NU - Network utilities /Introduction	99.31	Amend	Clarify the relationship between the objectives, policies and rules for network utilities and those of the zones. As the network utilities chapter is located within the “District-wide Matters” section of the Proposed District Plan, this is an appropriate place to clarify that. It is not clear whether objectives and policies in the other chapters (in particular the Overlay chapters) apply. In order to assist with plan interpretation and application, the relationship between the chapters requires clarification and clear explanation. Amendments are suggested to address this.	<p>Amend the text as follows:</p> <p>To achieve this, the network utility provisions in the District Plan provide for the establishment, operation, and maintenance of network utilities throughout the district while managing their adverse effects on the environment (particularly in sensitive environments such as the coastal environment, outstanding and significant landscapes, significant natural areas, areas containing cultural or historic heritage values, and areas subject to natural hazards). As many network utilities are lineal and traverse many parts of the district, it is considered appropriate that a single set of <u>objectives, policies and rules</u>, be provided that apply to <u>Network Utilities</u> across the District. <u>As such, the Network Utilities chapter is stand alone as it applies to Network Utility Operators and provisions in other chapters do not apply.</u></p>

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Transpower New Zealand Limited	NU - Network utilities /Introduction	99.32	Amend	Supports the text in so far as it relates to the effects on other activities on Network Utilities. However the rules associated with activities affecting the National Grid can be found throughout the District Plan and not just in the Network Utilities chapter, while the objectives and policies that manage these activities are found in the Network Utilities chapter. The text is potentially misleading with respect to the National Grid in that there are other applicable chapters. In order to correctly articulate the location of provisions specific to the National Grid, amended text is sought.	Amend the text as follows: Provisions to manage the effects of other activities on network utilities (including state highway and rail corridors, the electricity distribution network, the National Grid , and gas transmission pipelines) are contained, in the relevant chapters for zones and precincts, special overlays, and district-wide chapters such as the Noise chapter. <u>Provisions to manage the effects of land use and earthwork activities on the National Grid are contained in the Network Utilities Chapter, with subdivision near the National Grid managed in the Subdivision Chapter.</u> A number of network utility operators, including the Napier City Council, also utilise their ability to designate critical sites for a specified network utility purpose. Designations are identified on the Planning Maps and are listed in the 'Designations' section in 'Part 3 - Area-Specific Matters' in the District Plan.
Transpower New Zealand Limited	NU - Network utilities /Introduction /	99.33	Support	Transpower supports the text which relates to the NESETA and relationship to district plan rules.	Retain the text
Transpower New Zealand Limited	NU - Network utilities /Issues /NU-I1: Essential role of network utilities	99.34	Support	Transpower supports the issue	Retain the issue
Transpower New Zealand Limited	NU - Network utilities /Issues /NU-I2: Management of adverse effects of network utilities	99.35	Amend	Transpower supports the issue but seeks amendment to refer to 'operational need'.	Amend the issue as follows: The effects of network utilities can also have greater impact on residential environments than other areas, and on sites of significance throughout the city, such as significant natural areas, outstanding landscape features, heritage sites, and cultural sites. The siting of network utilities can also potentially worsen risk in areas subject to natural hazards. Sometimes these adverse effects have to be balanced alongside recognising any functional need, <u>operational need</u> or constraints that may limit where a network utility can be sited.
Transpower New Zealand Limited	NU - Network utilities /Issues /NU-I3: The impact of activities on network utilities	99.36	Support	Transpower supports the issue, and in particular the recognition that some activities can compromise network utilities.	Retain the issue.
Transpower New Zealand Limited	NU - Network utilities /Objectives /NU-O1: Essential role of network utilities	99.37	Support	Transpower supports recognition of the essential role of network utilities.	Retain the objective.
Transpower New Zealand Limited	NU - Network utilities /Objectives /NU-O2: Adverse effects of network utilities	99.38	Support	The recognition of the functional and operational needs of network utilities is supported. This approach will give effect to the NPSET and the RPS OBJ 33. The reference to 'as far as is practicable' is supported as it reflects that there are operational needs and technical constraints as to how far adverse effects can be avoided, remedied or mitigated.	Retain the objective.

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Transpower New Zealand Limited	NU - Network utilities /Objectives /NU-O3: Adverse effects on network utilities	99.39	Support	Transpower supports the objective as it appropriately recognises the potential for activities to compromise network utilities, in accordance with RPS Objective OBJ 32 and Policy 10 of the NPSET.	Retain the objective.
Transpower New Zealand Limited	NU - Network utilities /Policies /NU-P1: Essential role of network utilities	99.40	Support	Transpower supports the recognition of the national, regional and local importance and benefits of network utilities, and requirement to provide for these benefits by enabling the operation, maintenance and minor upgrading, and and providing for upgrades and development While the policy is not specific to the National Grid, it does give effect to the NPSET.	Retain the policy.
Transpower New Zealand Limited	NU - Network utilities /Policies /NU-P2: Adverse effects of network utilities	99.41	Amend	Amendment is sought to clause a. to recognise the nature of existing network utilities and confine clause a. to upgrade and development. An amendment is also sought to remove reference to 'electricity transmission' as it is covered by the National Grid.	<p>Amend the policy as follows:</p> <p>NU-P2: Adverse effects of network utilities</p> <p>Require the development, operation, maintenance, repair, upgrading, and removal of infrastructure to avoid, remedy, or mitigate adverse effects, including by:</p> <p>a. <u>in relation to upgrading and development</u>, avoiding, remedying or mitigating adverse effects on:</p> <ul style="list-style-type: none"> i. natural and physical resources; ii. amenity values, including from shading, visual dominance, noise, vibration, light spill, traffic and access, dust nuisance; ii. the safe and efficient operation of other network utilities, including effects on electricity distribution, electricity transmission and the National Grid, gas transmission pipelines, road and rail networks, and infrastructural service networks, and ix. the health, wellbeing, and safety of people and communities, including by minimising risks from exposure to radiofrequency fields, electric and magnetic fields, and from natural hazards. <p>b. requiring compliance with recognised standards and guidelines for the potential adverse effects of noise, vibration, radiofrequency fields, and electric and magnetic fields.</p> <p>c. encouraging the progressive undergrounding of appropriate network utilities where technically feasible and practicable.</p> <p>d. encouraging the co-siting and sharing of facilities and other innovative solutions.</p> <p>e. encouraging the removal of redundant and superseded above ground network utility facilities.</p>

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Transpower New Zealand Limited	NU - Network utilities /Policies /NU-P3: Adverse effects of network utilities on protected areas and sites of significance	99.42	Amend	<p>Considers that while the policy is supported, clarity is required around the terms: significant landscapes, high natural character areas, and significant amenity features, as none of the terms are defined in the PDP or identified on the planning maps. Specific to natural features and landscapes, Transpower assumes the policy should refer to 'Outstanding natural features, Special character landscapes, and Special character features'. A 's' is also sought at the end of 'need'.</p> <p>Clarification is also sought as why clause 1. relates to the effects on the areas. whereas clause 2. relates to managing the effects on the 'values and attributes' of the areas.</p>	<p>Seeks to amend the policy as follows:</p> <p>NU-P3: Adverse effects of network utilities on protected areas and sites of significance</p> <ol style="list-style-type: none"> 1. Manage the adverse effects of upgrades to and development of new network utilities on: <ol style="list-style-type: none"> a. outstanding natural features and significant landscapes; <u>and special character landscapes</u> b. significant natural areas; c. sites of significance to Māori, and d. historic heritage areas, heritage items, and notable trees. while recognising the extent to which adverse effects can be avoided or may be constrained by a network utility's functional or operational needs. 2. Manage the adverse effects of upgrades to and the development of new network utilities on the values and attributes of areas identified in the District Plan as: <ol style="list-style-type: none"> a. high natural character areas; <u>special character features;</u> <u>and</u> b. heritage character areas, and c. significant amenity features.
Transpower New Zealand Limited	NU - Network utilities /Policies /NU-P4: Adverse effects on network utilities	99.43	Amend	<p>Considers that the policy recognises the adverse effects of subdivision, land use and development on the operation, maintenance, upgrading and development of the National Grid, and is therefore supported. The policy largely gives effect to Policies 10 and 11 of the NPSET. 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.</p> <p>The policy is also supported in that it recognises that in addition to reverse sensitivity effects, subdivision, land use and development can also compromise the National Grid through activities such as access to the National Grid assets being blocked, buildings and structures being located close to assets and causing risk and safety issues (such as flashovers) or the location of buildings and activities, including 'sensitive activities' such as schools and residential properties, beneath or in close proximity to lines and/or structures can limit Transpower's ability to maintain, upgrade and develop the National Grid.</p> <p>Earthworks (And vertical holes) can adversely affect the National Grid. Specific to the National Grid, earthworks have the potential to undermine transmission line structures, generate dust, reduce the</p>	<p>Seeks the policy be amended as follows:</p> <p>NU-P4: Adverse effects on network utilities</p> <p>Protect network utilities from the adverse effects of subdivision, <u>earthworks</u>, use and development that may constrain or compromise the safe, effective, secure, and efficient operation, maintenance, upgrading and development of network utilities and the safety and amenity values of people and the community, including by:</p> <p>...</p> <p>g. ensuring that land disturbance <u>earthworks and vertical holes, subdivision, buildings, structures</u> and activities within the National Grid Yard, and subdivision within the National Grid Subdivision Corridor, or within the vicinity of a designated National Grid substation that may <u>directly affect or otherwise compromise the safe and efficient operation, maintenance, repair, or upgrading of the National Grid or result in reverse sensitivity effects, are avoided,</u></p> <p>h. maintaining safe electrical clearance distances under electricity distribution lines and support structures, <u>and managing all activities to avoid exposure to health and safety risks from the National Grid;</u></p> <p>...</p> <p>k. <u>maintaining ongoing access to National Grid conductors and support structures for maintenance and upgrading works; and</u></p> <p>l. <u>achieving compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).</u></p> <p>Alternately to the above, Transpower would support a specific and separate policy to manage the effects of activities on the National Grid.</p>

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Transpower New Zealand Limited	NU - Network utilities /Policies /NU-P6: Adverse effects of the National Grid Yard and National Grid Corridor	99.44	Amend	<p>Considers the development of the National Grid must be managed to ensure that the potential for adverse effects is appropriately managed while recognising the significance of the National Grid and the constraints under which it operates. The NPSET recognises the national significance of the National Grid and provides a suite of specific policies which are required to be given effect to in the district plan. The NPSET requires the District Plan to include objectives and policies that:</p> <ul style="list-style-type: none"> • Allow for the consideration of technical constraints and operational requirements under which the National Grid operates e.g. the linear nature of the transmission lines. • Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the route, site, and method selection process. • Ensure planning and development of the National Grid has regard to the existing environment. <p>The above means that policies, plans and decision makers must take in to account the characteristics of the National Grid, its technical and operational constraints, and the route, site and method selection process when considering the adverse effects of new National Grid infrastructure on the environment.</p> <p>Transpower seeks a standalone policy as the most efficient way to give effect to the NPSET and provisions of a specific policy for the National Grid is consistent with the approach sought and adopted across other district (and regional) plans across the country. In this</p>	<p>Seeks to amend the policy as follows:</p> <p>NU-P6: Adverse effects of the National Grid Yard and National Grid Corridor</p> <p>Enable major upgrading and development of the National Grid while managing adverse effects on the environment, including by:</p> <p><u>a. when considering measures to avoid, remedy and mitigate adverse effects of National Grid activities:</u></p> <ul style="list-style-type: none"> i. considering the constraints imposed by locational, technical, and operational requirements; ii. b. having regard to the extent to which effects have been avoided, remedied, or mitigated by route, site, or method selection; <p><u>b. where appropriate, using substantial upgrades as an opportunity to reduce existing adverse effects</u></p> <ul style="list-style-type: none"> c. in urban areas, avoiding adverse effects on town centres, areas of high recreation value or amenity, and existing sensitive activities, and d. in rural areas, seeking to avoid adverse effects <u>on areas and values identified in Schedule 2 (Natural Feature and Landscapes), Schedule 3 (Historic Heritage), Schedule 5 (Archaeological Sites), Sites of Significance to Maori, and Significant Natural Areas.</u> outstanding natural landscapes, high natural character areas, areas of high recreation value and amenity, and existing sensitive activities. <p><u>e. Where the National Grid has a functional or operational need to locate within the Coastal Environment, manage adverse effects by:</u></p> <ul style="list-style-type: none"> i. Seeking to avoid adverse effects on areas and values indentified in Schedule 2 (Natural
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R5: Construction of new network utilities and upgrading of existing network utilities (that are not regulated by an NES) within the National Grid Yard (other than for the reticulation and storage of water for irrigation purposes carried out by a network utility operator) in all zones and precincts	99.45	Amend	<p>Supports the provision of a permitted rule for certain network utility activities within the National Grid Yard subject to certain standards being met. Notwithstanding the support, amendments are sought to the rule as follows:</p> <ul style="list-style-type: none"> - Amendment to the title to include 'electricity generation that connects to the National Grid', as such activities are not captured by S166 of the RMA as a network utility. - Removal of reference to 'that are not regulated by an NES' to ensure the rule applies to activities subject to the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016. - Inclusion of a new condition (4) that there be no loss of access to a National Grid Support Structure. Ongoing access to required for maintenance and emergency works. 	<p>Amend Rule NU-R5 as follows:</p> <p>NU-R5: Construction of new network utilities and upgrading of existing network utilities (that are not regulated by an NES), or any part of electricity generation that connects to the National Grid, within the National Grid Yard (other than for the reticulation and storage of water for irrigation purposes carried out by a network utility operator) in all zones and precincts</p> <p>...</p> <p>NU-R5B Activity Status where activity condition 1 is not met: Restricted Discretionary Matters of discretion are: ...</p> <p>Notification: Any application under this rule is precluded from being publicly notified.</p> <p>Activity Status where activity conditions 2 or 3 <u>or 4</u> are not met: Non-complying</p>

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Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R6: Construction of new network utilities (that are not regulated by an NES) not already provided for in NU-R4 (within the Airport Zone) and NU-R5 (within National Grid Yard) in all zones and precincts, except the Estuary, Foreshore Reserve, Reserve and/or River Conservation Zones	99.46	Support	<p>Support the rules specific to the National Grid, Rules NU-R6, NU-R7, NU-R12 and NU-R14 all manage the construction of new national grid assets within the city.</p> <p>Rule 6 relates to all zones and precincts excluding the Estuary Foreshore, Reserve and River Conservation zones. Where the standards are not met, consent is required for a restricted discretionary activity (defaulting to non-complying where the Electric and Magnetic field standard is not met). Above ground assets within the Estuary Foreshore, Reserve and River Conservation zones are a discretionary activity under Rule NU-R14.</p> <p>It is noted that rules R5, R6 and R12 all include the qualifier 'that are not regulated by an NES'. This qualifier does not apply to the National Grid as the NESETA does regulate new National Grid assets. However the NES-telecommunications will be applicable.</p> <p>Transpower supports the rules as they provide an appropriate consenting framework in which to consider new National Grid assets. The activity status give effect to the NPSET, specifically Policy 1 and Policy 2.</p>	Retain Rule NU-R6 as notified.
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R7: Construction of new underground network utilities in the Estuary, Foreshore Reserve, Reserve and/or River Conservation Zones	99.47	Support	<p>Support rules specific to the National Grid, Rules NU-R6, NU-R7, NU-R12 and NU-R14 all manage the construction of new National Grid assets within the city.</p> <p>Rule 7 relates to new underground assets within the Estuary Foreshore, Reserve and River Conservation zones. Where the standards are not met, consent is required for a restricted discretionary activity (defaulting to non-complying where the Electric and Magnetic field standard is not met).</p> <p>Transpower supports the rules as they provide an appropriate consenting framework in which to consider new National Grid assets. The activity status gives effect to the NPSET, specifically Policy 1 and Policy 2.</p>	Retain Rule NU-R7 as notified.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R12: New above ground network utilities within the Estuary, Foreshore Reserve, Reserve and/or River Conservation Zones (that are not regulated by an NES)	99.48	Support	<p>Support rules specific to the National Grid, Rules NU-R6, NU-R7, NU-R12 and NU-R14 all manage the construction of new National Grid assets within the city.</p> <p>Rule 12 relates to new above ground assets within the Estuary Foreshore, Reserve and River Conservation zones. Where the standards are not met, consent is required for a restricted discretionary activity (defaulting to non-complying where the Electric and Magnetic field standard is not met).</p> <p>It is noted that rules R5, R6 and R12 all include the qualifier 'that are not regulated by an NES'. This qualifier does not apply to the National Grid as the NESETA does regulate new National Grid assets. However the NES-telecommunications will be applicable.</p> <p>Transpower supports the rules as they provide an appropriate consenting framework in which to consider new National Grid assets. The activity status give effect to the NPSET, specifically Policy 1 and Policy 2.</p>	Retain Rule NU-R12 as notified.
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R13: Buildings or structures within the National Grid Yard in all zones	99.49	Amend	<p>Transpower supports NU-R13 (and NU-R13A and NU-13B) on the basis it gives effect to Policy 10 and Policy 11 of the NPSET. There are health and safety issues of activities located in within proximity to the National Grid, and the National Grid can be affected by other activities that establish beneath or in close proximity to its lines and/or structures, generating reverse sensitivity effects where landowners/ operators request a Council to impose constraints on existing infrastructure to manage effects such as noise, reduced visual amenity, radio and television interference, perceived Electric and Magnetic Field ('EMF') effects, or interference with business activities beneath the lines. Access to support structures can also be compromised, thereby affecting Transpower's ability to operate and maintain the assets as well as respond to any emergency situations.</p> <p>The provisions sought in relation to the National Grid Yard are intended to allow for the reasonable use of land inside the transmission line corridor, with standards and rules imposed to ensure that any land use and development that might compromise the National Grid is either managed or avoided.</p> <p>Specific to the 12 m 'National Grid Yard', there are some activities within the National Grid Yard that will not significantly compromise the operation, maintenance or any upgrade of the network, due to their nature and small scale. Certain structures are less problematic within 12 m of the line on the basis they are unlikely to "build out" a transmission line. The access or use of these structures can be restricted without causing animal welfare or business disruption</p>	<p>Amend Rule 13 as follows;</p> <p>NU-R13: Buildings, or structures <u>or activities</u> within the National Grid Yard, in all zones</p> <p>NU-R13A All zones Activity Status: Permitted Where: 1. The activity is not a sensitive activity. 2. The building or structure is not for the handling or storage of <u>Class 1-4</u> hazardous substances (Hazard Classification Notice 2020) with explosive or flammable intrinsic properties (except this does not apply to accessory use and storage of hazardous substances in domestic scale quantities). 3. The building... 4. All buildings, structures and activities permitted by 1. 2. or 3. above must:</p> <p>a. The building or structure must have a vertical clearance of 10 m below the lowest point of a conductor under all transmission lines and building operating conditions meet the electrical distances required by NZECP 34: 2001 under all transmission line and building operation conditions.</p> <p>b. <u>Not physically impede vehicular access to a National Grid support structure; and</u></p> <p>c. 5. The building or structure is <u>be</u> located at least 12 m from the outer visible edge of a foundation of a National Grid transmission line support structure or pole, except where it:</p> <p>i. a. <u>i. a.</u> is a network utility; ii. b. <u>ii. b.</u> is a fence not exceeding 2.5 m in height that is located at least: i. <u>i.</u> 6 m from the outer visible edge of a foundation of a National Grid transmission line tower,</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R14: Activities not otherwise provided for (that are not regulated by an NES)	99.50	Support	<p>Specific to the National Grid, Rules NU-R6, NU-R7, NU-R12 and NU-R14 all manage the construction of new National Grid assets within the city.</p> <p>Rule 14 is the catch all discretionary rule.</p> <p>Transpower supports the rules as they provide an appropriate consenting framework in which to consider new National Grid assets. The activity status give effect to the NPSET, specifically Policy 1 and Policy 2.</p>	Retain NU-R14 as notified.
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R9: New amateur radio configuration in all zones and precincts	99.51	Amend	<p>Supports the intent of the rule and condition relating to the non-complying activity status for new amateur radio configurations within the National Grid Yard, however the activity would already be captured by Rule NU-R13. Amendment is therefore sought in the Transpower submission to include within the non-complying rule, "or the activity is not otherwise specifically provided for."</p>	<p>Transpower seeks deletion of condition 4 from the rule as follows:</p> <p>NU-R9A Activity Status: Permitted Where: 1. The activity ... 2. The activity complies with NU-S14 (Amateur Radio Configuration), and 3. The activity is not within the National Grid Yard.</p> <p>NU-R9B Activity Status where activity conditions 1 or 3 are not met: Restricted Discretionary Matters of discretion are: 1. The relevant .. Notification: Any application under this rule is precluded from being publicly notified. Activity Status where activity conditions 2 or 4 are is not met: Non-complying</p>
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R10: New electrical vehicle charging facilities in all zones and precincts	99.52	Amend	<p>While Transpower supports the intent of the rule and condition, the activity would be captured by Rule NU-R13, and specifically the amendment sought in the Transpower submission to include within the non-complying rule, "or the activity is not otherwise specifically provided for."</p>	<p>On the basis NU-R13 is amended as sought in the Transpower submission, Transpower seeks deletion of condition 4 from the rule as follows:</p> <p>NU-R10A Activity Status: Permitted Where: 1. The activity is installed in association with an existing permitted or consented vehicle park, vehicle depot, or garage structure; 2. The activity complies with standards (NU-S1 - NU-S11); 3. The activity complies with standard NU-S12 (Radio Frequency Fields) and standard NU-S13 (Electric and Magnetic Fields), and 4. The activity is not within the National Grid Yard.</p> <p>NU-R10B ... Activity Status where activity conditions 3 or 4 are is not met: Non-complying</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R11: Temporary network utilities in all zones and precincts	99.53	Amend	While Transpower supports the intent of the rule and condition, the activity would be captured by Rule NU-R13, and specifically the amendment sought in the Transpower submission to include within the non-complying rule, "or the activity is not otherwise specifically provided for."	<p>On the basis NU-R13 is amended as sought in the Transpower submission, Transpower seeks deletion of condition 6 from the rule as follows:</p> <p>NU-R11A Activity Status: Permitted Where: 1. The activity operates for a maximum of 12 months; ... 5. The activity complies with standard NU-S12 (Radio Frequency Fields) and standard NU-S13 (Electric and Magnetic Fields), and 6. The activity is not within the National Grid Yard.</p> <p>NU-R11B ... Activity Status where activity conditions 5 or 6 are is not met: Non-complying</p>
Transpower New Zealand Limited	NU - Network utilities /NU - Network Utilities - Rules Table /NU-R12: New above ground network utilities within the Estuary, Foreshore Reserve, Reserve and/or River Conservation Zones (that are not regulated by an NES)	99.54	Support	<p>Specific to the National Grid, Rules NU-R6, NU-R7, NU-R12 and NU-R14 all manage the construction of new National Grid assets within the city.</p> <p>Rule 12 relates to new above ground assets within the Estuary Foreshore, Reserve and River Conservation zones. Where the standards are not met, consent is required for a restricted discretionary activity (defaulting to non-complying where the Electric and Magnetic field standard is not met).</p> <p>It is noted that rules R5, R6 and R12 all include the qualifier 'that are not regulated by an NES'. This qualifier does not apply to the National Grid as the NESETA does regulate new National Grid assets.</p> <p>Transpower supports the rules as they provide an appropriate consenting framework in which to consider new National Grid assets. The activity status give effect to the NPSET, specifically Policy 1 and Policy 2.</p>	Retain Rule NU-R12.
Transpower New Zealand Limited	NH - Natural Hazards /NH - Natural Hazards /	99.55	Support	<p>Transpower supports a variation to the PDP in relation to Natural Hazards. Transpower notes the submission points made in the balance of this submission have been made without the benefit of the Natural Hazards provisions and therefore Transpower reserves its position on the lodged submission points in so far as they relate to Natural Hazards.</p> <p>In terms of any future variation, Transpower would support the following be included in the variation:</p> <ul style="list-style-type: none"> - Explicit policy recognition and rule framework for the ongoing operation, maintenance and minor upgrading of physical infrastructure. - Policy recognition of the operational and technical constraints for new infrastructure and the potential need to locate in hazard areas where the activity can be designed accordingly. - A restricted discretionary activity status for new network utility structures located within the Hazard Area. It would be useful to have a matter of discretion which reflects the operation and technical constraints of the network. 	Seeks to enable submitters to update other submission points in so far as they are relevant to Natural Hazards.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	HH - Historic heritage /Policies /HH-P1: Identification and classification of historic heritage	99.56	Support	Transpower supports the identification of historic heritage on the basis the mapping and identification will assist with plan interpretation and application.	Retain the policy.
Transpower New Zealand Limited	SOSM - Sites of Significance to Maori /SOSM - Sites of Significance to Maori /	99.57	Support	Transpower supports a variation to the PDP in relation to Sites of Significance to Māori. Transpower notes the submission points made in the balance of this submission have been made without the benefit of the Sites of Significance to Māori provisions and therefore Transpower reserves its position on the lodged submission points in so far as they relate to Sites of Significance to Māori.	Seeks to ensure submitters have the ability to update other submission points in so far as they are relevant to SOSM - Sites of Significance to Māori.
Transpower New Zealand Limited	ECO - Ecosystems and Indigenous Biodiversity /ECO - Ecosystems and Indigenous Biodiversity /	99.58	Support	Transpower supports a variation to the PDP in relation to Indigenous Biodiversity, noting the NPS-IB does not apply to electricity transmission. Transpower notes the submission points made in the balance of this submission have been made without the benefit of the Indigenous Biodiversity provisions and therefore Transpower reserves its position on the lodged submission points in so far as they relate to Indigenous Biodiversity.	Seeks to ensure submitters have the ability to update other submission points in so far as they are relevant to ECO - Ecosystems and Indigenous Biodiversity.
Transpower New Zealand Limited	SUB - Subdivision /Issues /SUB-17: Issues of reverse sensitivity on adjacent land uses	99.59	Amend	On the basis of Policy NU-P4 and the amendments sought through this submission, Transpower supports the retention of the issue.	Should NU-P4 not be amended as sought in this submission, Transpower seeks amendment to the issue to give effect to the NPSET and reflect the amendments sought to NU-P4.
Transpower New Zealand Limited	SUB - Subdivision /Objectives	99.60	Amend	While Transpower supports the intent of the note, amendment is required to provide reference to objectives and policies in the Network Utilities chapter. While the rule for managing subdivision in the National Grid Subdivision Corridor is contained within the Subdivision chapter, the applicable policy framework is contained in the Network Utilities chapter. This cross referencing needs to be made clear for plan users.	Amend the text as follows: Note: The objectives and policies contained in other chapters, including (but not necessarily limited to) zone chapters and district-wide chapters, including the Transport chapter, <u>Network Utilities Chapter (as it relates to subdivision within the National Grid Subdivision Corridor)</u> , Public Access chapter, the Natural Hazards chapter, and the Hazardous Substances and Contaminated Land chapter, are relevant in addition to those below.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	SUB - Subdivision /Objectives /SUB-O3: Infrastructure, transport, and connectivity	99.61	Amend	<p>Considers that the management of reverse sensitivity effects in the context of ensuring that the operation, maintenance, upgrading, and development of the electricity transmission network is not compromised is achieved partly through regulating subdivision. The wording of clause (d) does not currently read clearly and does not include the full suite of activities associated with the National Grid that require protection under Policy 10 of the NPSET. Further, insofar as it relates to the National Grid, clause d does not give effect to Policy 10 because it only requires mitigation rather than avoidance of reverse sensitivity effects.</p> <p>On the basis of Policy NU-P4 and the amendments sought to it through this submission, Transpower supports the retention of SUB-O3 as NU-P4 is the more relevant policy.</p>	<p>Should NU-P4 not be amended as sought in this submission, Transpower seeks amendment to the objective to give effect to the NPSET and reflect the amendments sought to NU-P4 as follows:SUB-O3: Infrastructure, transport, and connectivity</p> <ul style="list-style-type: none"> a. subdivision has a layout that is: <ul style="list-style-type: none"> i. safe, efficient, convenient, accessible, enhances connectivity and encourages active transport modes, and ii. resilient and integrates with existing communities and provides for the long-term needs of its residents. b. infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner at the time of subdivision. c. land is vested at the time of subdivision to provide for high-quality reserves, esplanade reserves, roads, stormwater, access and other purposes for the benefit of the wider community. d. subdivision does not compromise the operation, maintenance, upgrade and development of, protects the operation and access to, established network utilities and regionally significant infrastructure while mitigating reserve sensitivity effects.
Transpower New Zealand Limited	SUB - Subdivision /Policies /SUB-P1: Compatible land use	99.62	Support	<p>Specific to the PDP Subdivision Chapter, Policy NU-P4 (as sought to be amended in this submission) within the Network Utilities Chapter provides the policy framework for subdivision within the National Grid Subdivision Corridor. However, the associated rules are provided within the Subdivision Chapter (Rule SUB-S9). On the basis of Policy NU-P4 and the amendments sought through this submission, Transpower supports the retention of the policy SUB-P1, noting it is not sufficiently directive to give effect to the NPSET and therefore reliance is required on NU-P4.</p>	<p>Should NU-P4 not be amended as sought in this submission, Transpower seeks amendment to SUB-P1 policy to give effect to the NPSET and reflect the amendments sought to NU-P4.</p>
Transpower New Zealand Limited	SUB - Subdivision /Policies /SUB-P13: Network utilities	99.63	Support	<p>Transpower supports the policy recognition for subdivision for network utility activities.</p>	<p>Retain the policy.</p>
Transpower New Zealand Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R3: Subdivision of land for the purpose of public works, network utilities, reserves, or access	99.64	Amend	<p>As sought in the submission, Transpower seeks a stand alone National Grid Subdivision Corridors rule (refer new rule SUB-RXX - made as a general submission point). The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief for a new submission point not be accepted, Transpower seeks amendment to SUB-R3 (and R3A and R3B) to amend the activity for subdivision in the National Grid Subdivisions Corridor to restricted discretionary, defaulting to non complying where the standards are not met.</p>	<p>Seeks a stand alone National Grid Subdivision Corridors rule (refer new rule SUB-RXX - made as a general submission point). If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief for a new submission point not be accepted, Transpower seeks amendment to SUB-R3 (and R3A and R3B) to amend the activity for subdivision in the National Grid Subdivisions Corridor to restricted discretionary, defaulting to non complying where the standards are not met.</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	SUB - Subdivision / /	99.65	Amend	<p>Considers that inappropriate subdivision and use of land within the National Grid Corridor is a potential issue that can be managed through a corridor management approach. The disconnect between the policy framework for subdivision within the National Grid Corridor (NU-P4) sits within the Network Utilities chapter while the rules for subdivision sit within the Subdivision chapter. This disconnection is potentially confusing to plan users and Transpower seeks a specific subdivision rule within the Network Utilities Chapter. Should this not be granted, Transpower seeks amendment to SUB-R9 and all the rules which reference the standard. As proposed the PDP Subdivision Chapter provides for the subdivision provisions relating to the National Grid Subdivision Corridor provided as a standard within SUB-S9, which is then referenced in each of the relevant rules. While Transpower supports a specific standard relating to subdivision within the National Grid Subdivision Corridor, Transpower seeks a stand-alone rule and a specific standard and activity status that appropriately manages subdivision within proximity of the National Grid.</p> <p>Considers that subdivision within the National Grid Subdivision Corridor should be a restricted discretionary activity where the newly created lots comply with the standards SUB-S9. Transpower is opposed to the controlled activity status as the resource consent could not be declined and would not provide the ability for Transpower to be involved in the subdivision design process or ensure the subdivision does not compromise the ability to operate, maintain and upgrade the line, including the provision of access.</p>	<p>Seeks a specific subdivision rule within the Network Utilities Chapter as follows, which refers to SUB-S9. Should this not be granted, Transpower seeks amendment to rules which reference the standard SUB-S9, to change the activity from controlled to restricted discretionary:</p> <p><u>SUB-RXX Subdivision within the National Grid Subdivision Corridor</u> <u>All Zones and Overlays Areas</u> 1. Activity Status: Restricted Discretionary</p> <p>Where the following condition is met: a. <u>Compliance with: SUB-S9 National Grid Subdivision Corridor.</u></p> <p><u>Matters of discretion are restricted to:</u> <u>The matters in SUB-AC9</u></p> <p>2. Activity status where compliance with SUB-S9 is not achieved: Non complying</p> <p><u>Notification</u> An application under this rule is precluded from being publicly notified in accordance with <u>section 95A of the RMA.</u> 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 <u>Transpower New Zealand Limited.</u></p>
Transpower New Zealand Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R1: Subdivision	99.66	Amend	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought in for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought in for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>
Transpower New Zealand Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R5: Cross lease title to freehold subdivision	99.67	Amend	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R7: Subdivision of land within or containing a special character landscape	99.68	Amend	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>
Transpower New Zealand Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R8: Subdivision of lifestyle sites within the Productive Rural Zone with amalgamation	99.69	Amend	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>	<p>Transpower seeks a stand alone National Grid Subdivision Corridors rule. The reasoning is provided in the submission point. If accepted, this would mean the reference to SUB-S9 can be removed from the rule.</p> <p>Should the relief sought for a new National Grid Subdivision Corridor not be accepted, Transpower seeks amendment to SUB-R1 (and R1A and R1B) to amend the activity status for subdivision in the National Grid Subdivisions Corridor from controlled to restricted discretionary, defaulting to non complying where the standards in SUB-S9 are not met.</p>
Transpower New Zealand Limited	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S9: Building platforms within the National Grid Subdivision Corridor	99.70	Support	<p>Notwithstanding its other submission points seeking the relocation of all the National Grid subdivision provisions within the NU Chapter and the provision of a new specific National Grid Subdivision Corridor rule, Transpower supports the standards in that they provide a clear framework for managing the effects of subdivision on the National Grid.</p>	<p>Retain SUB-S9 but relocate within the NU Chapter.</p>
Transpower New Zealand Limited	SUB - Subdivision /Assessment criteria /SUB-AC9: National Grid Subdivision Corridor	99.71	Amend	<p>Notwithstanding its other submission points seeking the relocation of all the National Grid subdivision provisions within the NU Chapter, Transpower supports the provision of assessment matters as they clearly articulate the issues associated with subdivision within the National Grid Subdivision Corridor. In order to further inform any assessment associated with a resource consent application, two additional assessment matters are sought.</p>	<p>Retain the matters within SUB-AC9 but amend as follows:</p> <p>SUB-AC9: National Grid Subdivision Corridor</p> <p>a. The extent to which the subdivision design allows for the ongoing efficient operation, maintenance, upgrading, and development of the National Grid, including the ability for continued reasonable access for inspections, maintenance, and upgrading.</p> <p>b. The extent to which the design and construction of the subdivision allows for activities to be set back from the National Grid, <u>including the ability to provide a complying building platform outside of the National Grid Yard.</u></p> <p>...</p> <p>f. The extent to which the design and construction of any subdivision allows for earthworks, buildings and structures to comply with the safe separate distance requirements in the <u>New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001.</u></p> <p>g. The outcome of any technical advice provided by Transpower.</p>
Transpower New Zealand Limited	EW - Earthworks //	99.72	Amend	<p>Seeks a specific submission rule within the Network Utilities chapter to manage earthwork activities within the National Grid Yard. Should the submission point be rejected, Transpower seeks the rule within the Earthworks Chapter.</p>	<p>Seeks a specific submission rule within the Network Utilities chapter to manage earthwork activities within the National Grid Yard. Should the submission point be rejected, Transpower seeks the rule within the Earthworks Chapter. Appropriate cross reference would be required in the introduction to the Network Utilities Chapter to make the existence and linkage of the rule evident to plan users.</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NU - Network utilities //	99.73	Amend	<p>Seeks an amendment to the Network Utilities chapter to include a new rule for earthworks within the National Grid Corridor. Earthworks can compromise the National Grid and are anticipated by the NPSET (Policy 10). Earthworks adjacent to support structures can undermine the stability of the structure foundations, causing the structure to lean or, worse, collapse, leading to power outages. Excavations or mounding mid-span can increase risks by reducing the clearance between the ground and conductors. Excavated areas or piles of earthworks can also restrict Transpower’s ability to access and locate the heavy machinery required to maintain support structures and conductors around the lines, including in emergency situations. The PDP contains no provisions specific to earthworks in the National Grid Yard, either in the Network Utilities Chapter or in the Earthworks Chapter. It is noted that there is a standard EW-S8 specific to earthworks in proximity of a gas transmission line but no applicable standard for earthworks within proximity of the National Grid.</p> <p>The National Planning Standard definition of earthworks specifically excludes the disturbance of land for the installation of fence posts. For this reason, the rule needs to be amended to expressly regulate fence posts.</p> <p>A permitted rule is sought, defaulting to non complying where the standards are not complied with.</p>	<p>Insert a new earthworks rule to manage activities within the National Grid yard as follows:</p> <p><u>NU – REW Earthworks and vertical holes within the National Grid Yard</u></p> <p><u>Activity Status Permitted</u></p> <p><u>Where:</u></p> <p><u>1. Earthworks and vertical holes do not:</u></p> <p><u>a. Exceed 300mm in depth within 6m of the outer visible edge of a National Grid support structure;</u></p> <p><u>b. Exceed 3m in depth between 6m and 12m of the outer visible edge of a National Grid support structure;</u></p> <p><u>c. Compromise the stability of any National Grid support structures;</u></p> <p><u>d. Result in the loss of vehicular access to a National Grid support structure; and</u></p> <p><u>e. Result in a reduction of the ground to conductor clearance distances as required in Table 4 of the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001;</u></p> <p><u>2. Earthworks and vertical holes for the following activities are exempt from compliance with EW-RX.1(a) to (d):</u></p> <p><u>a. Earthworks or vertical holes, excluding mining and quarrying, that are undertaken by a network utility operator as defined by the Resource Management Act 1991;</u></p> <p><u>b. Agricultural or domestic cultivation;</u></p> <p><u>c. The repair, sealing or resealing of a vehicle access or farm track, footpath or driveway;</u></p> <p><u>d. Vertical holes not exceeding 500mm in diameter that are a post hole for a farm fence or horticulture structure more than 6m from the visible outer edge of a National Grid tower foundation; and</u></p> <p><u>e. Earthworks and vertical holes :</u></p> <p><u>i. Subject to a dispensation from Transpower under New Zealand NZECP 34:2001, or</u></p> <p><u>ii. In relation to rule NU-EWX 1(d), written approval is provided by Transpower.</u></p>
Transpower New Zealand Limited	EW - Earthworks /EW - Earthworks - Rules Table /EW-R5: Earthworks or land disturbance for network utilities by a network utility operator, including vehicle access tracks for network utilities	99.74	Amend	<p>Transpower supports the centralisation of all network utilities provisions into the Network Utilities chapter rather than being scattered through the Proposed District Plan. Standard 7(30) of the National Planning Standards states that The Earthworks chapter must include cross-references to any relevant earthworks provisions under Energy, Infrastructure, and Transport heading. In addition to the above relocation issue, Rule EW-R5 requires compliance with Standards S2-S11 but not all are relevant to network utilities:</p> <ul style="list-style-type: none"> - S2 The cut and fill requirements may unintentionally apply to underground infrastructure when the focus should be on the finished ground level, not the depth of cut or fill which is undertaken in the process of undergrounding. As underground infrastructure spans multiple titles, S2(2) which required setbacks from boundaries is not relevant for network utilities. - S4 For network utility projects it is likely that earthworks will be removed offsite, and this is an unreasonably small limit. 	<p>Relocate Rule EW-R5 and the relevant standards into the Network Utilities chapter, and amend remove reference to standards S2 and S4.</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	CE - Coastal Environment /Introduction /	99.75	Support	Supports the mapping and identification of the Coastal Environment, There are no existing National Grid assets within the Coastal Environment as identified in the PDP.	Retain the mapping of the Coastal Environment.
Transpower New Zealand Limited	CE - Coastal Environment /Objectives /CE-O1: Avoid adverse effects on natural character	99.76	Support	Supports the reference to significant adverse effects and reference to 'inappropriate' subdivision, use and development.	Retain as notified.
Transpower New Zealand Limited	CE - Coastal Environment /Policies /CE-P2: Determine whether an activity is inappropriate in the coastal environment	99.77	Support	Supports the reference to 'functional or operational need'.	Retain as notified.
Transpower New Zealand Limited	CE - Coastal Environment /CE - Coastal Environment - Rules Table /	99.78	Support	Supports the note (and therefore the clarification) there are no specific Coastal Environment Chapter rules, and instead reliance on other PDP rules.	Retain as notified.
Transpower New Zealand Limited	CE - Coastal Environment /Introduction /	99.79	Amend	<p>Transpower requests clarification on the relationship between the various district plan chapters. On the basis of the introductory text to the Network Utility Chapter ("To achieve this, the network utility provisions in the District Plan provide for the establishment, As many network utilities are lineal and traverse many parts of the district, it is considered appropriate that a single set of rules be provided that apply across the District.") it is assumed the intent is the Coastal Environment Chapter would not apply to Network Utilities. Transpower requests amended text to clarify the relationship between the plan chapters.</p> <p>Should this not be the intent, appropriate policy recognition is required for Network Utilities within the Coastal Environment Chapter.</p>	<p>Amend the text as follows:</p> <p>This chapter contains the overarching objectives and policy framework to protect and manage the natural character and values of the coastal environment as well as provisions to manage activities within it. However, the associated rules are contained in the underlying zone chapters, such as the Open Space Zone, the Rural Production Zone, Subdivision, and other relevant district wide chapters of the District Plan. <u>The policy and rule framework for the operation, maintenance, upgrade and development of Network Utilities are managed in the Network Utilities Chapter.</u></p>
Transpower New Zealand Limited	RLZ - Rural Lifestyle Zone /RLZ - Rural Lifestyle Zone /	99.80	Support	<p>While existing National Grid assets are contained within the Rural Lifestyle zone, provisions relating to the operation, maintenance, upgrade and development of the National Grid are contained in the Network Utilities Chapter.</p> <p>On the basis the Rural Lifestyle Zone Chapter does not apply to Network Utilities (and specifically the National Grid) in relation to:</p> <ul style="list-style-type: none"> - The operation, maintenance, upgrade and development of the National Grid; - The effect of activities on the Grid. <p>Transpower seeks no relief in relation to the Rural Lifestyle Zone (RLZ). Should the RLZ apply, Transpower seeks provisions in the chapter to give effect to the NPSET.</p>	<p>On the basis the Rural Lifestyle Zone (RLZ) Chapter does not apply to Network Utilities, Transpower seeks no relief in relation to the Rural Lifestyle Zone. Should the RLZ apply, Transpower seeks provisions in the chapter to give effect to the NPSET.</p>

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	RPROZ - Rural Production Zone /RPROZ - Rural Production Zone /	99.81	Support	<p>While there are no existing National Grid assets within the Rural Production Zone, provisions relating to the development of the National Grid are contained in the Network Utilities Chapter.</p> <p>On the basis the Rural Production Zone Chapter does not apply to Network Utilities (and specifically the National Grid) in relation to the development of the National Grid, Transpower seeks no relief in relation to the Rural Production Zone (RPROZ). Should the RPROZ apply, Transpower seeks provisions in the chapter to give effect to the NPSET.</p>	On the basis the Rural Production Zone Chapter does not apply to Network Utilities (and specifically the National Grid) in relation to the development of the National Grid, Transpower seeks no relief in relation to the Rural Production Zone (RPROZ). Should the RPROZ apply, Transpower seeks provisions in the chapter to give effect to the NPSET
Transpower New Zealand Limited	TPR - Transpower New Zealand Limited /Transpower New Zealand Limited Designations /	99.82	Support	Supports the substation designation but seeks amendment to the designation boundary to reflect that sought in the designation rollover notice.	Retain the designation but amend the designation boundary line to accord with that sought in the rollover notice.
Transpower New Zealand Limited	APP2 - Redclyffe Substation 12m Setback /APP2 - Redclyffe Substation 12m Setback /	99.83	Oppose	Transpower is not pursuing the substation setback buffer and therefore supports its deletion from the plan. The setback is not required on the basis of the rural zoning.	Delete Schedule A, Appendix 2.
Transpower New Zealand Limited	Planning Maps //	99.84	Amend	<p>The five features of the National Grid shown on the Planning Maps are not defined in the Definitions chapter. Instead the National Grid is defined and the term is used for provisions throughout the Plan. Transpower seeks that the National Grid are defined on the Planning Maps, and the reference to 'Napier' is removed as the assets are national assets. Transpower also seeks the deletion of the remaining four features (being - Napier Transmission Lines Buffer; Transmission Structures; Substations; and Substation Setbacks) as it does not consider these mapping features necessary. Specific to the 'Napier Transmission Lines Buffer', Transpower has concerns with the identification on the maps as the aerial mapping cannot always be relied upon. Instead Transpower's preference is for reliance on the setbacks stipulated in the definitions for National Grid Yard and National Grid Subdivision Corridor. The substation features are not considered necessary as the only references to 'substations' in the PDP are in relation to the National Grid assets.</p>	<p>Transpower seeks the map features be amended as follows:</p> <p>Transpower supports the mapping of the National Grid. However, in context of the terminology of the PDP (which refers to 'National Grid' and not 'Transmission Lines') Transpower seeks the Grid be identified as 'National Grid' on the planning maps. The reference to 'Napier' is opposed as the assets are not specific to Napier, rather are national assets.</p> <ul style="list-style-type: none"> - Replace the 'Napier Transmission Lines' mapping feature with 'National Grid Lines'. - Delete the Napier Transmission Lines Buffer mapping feature - Delete the Transmission Structures mapping feature - Delete the Substations mapping feature - Delete the Substation Setbacks mapping feature
Transpower New Zealand Limited	SUB - Subdivision /Assessment criteria /SUB-AC7: Utility services - high voltage lines	99.85	Oppose	Opposes Assessment Criteria SUB-AC7 relating to Utility services - high voltage lines. The PDP does not define or explain what network utility constitutes 'high voltage lines' and the term is not used anywhere else in the PDP. On the basis SUB-AC7 applies to the National Grid, Transpower does not consider the criteria necessary as subdivision within the National Grid Subdivision Corridor is addressed under SUB-AC9. The duplication of the assessment criteria is potentially confusing to plan users and is neither efficient or effective.	Seeks SUB-AC7 to be deleted. On the basis SUB-AC7 applies to the National Grid, Transpower does not consider the criteria necessary as subdivision within the National Grid Subdivision Corridor is addressed under SUB-AC9. The duplication of the assessment criteria is potentially confusing to plan users and is neither efficient or effective.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	SUB - Subdivision /Objectives /SUB-O1: Compatible land use	99.86	Support	On the basis subdivision within the National Grid Subdivision Corridor is managed under NU-P4, Transpower is neutral on SUB-O1. However should NU-P4 not be amended as sought in the Transpower submission, Transpower seeks amendment to SUB-O1 to give effect to the NPSET.	Retain SUB-O1 on the basis NU-P4 is amended as sought in the Transpower submission. Should NU-P4 not be amended, Transpower seeks amendment to SUB-O1 to give effect to the NPSET.
Transpower New Zealand Limited	NFL - Natural Features and Landscape //	99.87	Amend	Seeks clarification as to whether the Natural Features and Landscapes provisions are applicable to the Network Utilities provisions. Based on the introductory text of the Network Utilities chapter, it is assumed that the NFL chapter does not apply. Policy NU-P3 applies to outstanding natural features and significant landscapes, and high natural character areas and significant amenity features. Notwithstanding some of these terms are not defined, the intent is that the Network Utilities chapter provide the policy consideration for effects on Natural Features and Landscapes. Specific to the National Grid, policy NU-P6 provides a specific 'seek to avoid' policy approach in respect of development of the National Grid.	Clarify the relationship between the chapters, and rely solely on the Network Utilities chapter to manage network utilities. The applicability of the objectives and policies of the NFL chapter to the Network Utilities chapter also requires clarification.
Transpower New Zealand Limited	NFL - Natural Features and Landscape /Policies /NFL-P1: Identification of outstanding natural features, special character landscapes, and special character features	99.88	Support	Supports the identification and mapping of the areas.	Retain the policy.
Transpower New Zealand Limited	NFL - Natural Features and Landscape /Policies /NFL-P2: Protection of Ōtātara as an outstanding natural feature	99.89	Amend	Clarification is sought on the relationship between the NFL chapter and the NU chapter. Based on the introductory text to the Network Utilities chapter, it is assumed the rules in the Natural Features and Landscapes ('NFL') chapter do not apply. Applicability of the objectives and policies of the NFL chapter also requires clarification. It is noted that policy NU-P3 applies to outstanding natural features and significant landscapes, and high natural character areas and significant amenity features. Notwithstanding some of these terms are not defined, the intent is that the Network Utilities chapter provide the policy consideration for effects on Natural Features and Landscapes. Specific to the National Grid, policy NU-P6 provides a specific 'seek to avoid' policy approach in respect of development of the National Grid. Should policy NFL-P2 apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8.	Should policy NFL-P2 apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. Potential wording is provided in NU-P6 as sought to be amended through this submission.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NFL - Natural Features and Landscape /Policies /NFL-P3: Protection of special character features	99.90	Amend	<p>Clarification is sought on the relationship between the NFL chapter and the NU chapter. Based on the introductory text to the Network Utilities chapter, it is assumed the rules in the Natural Features and Landscapes ('NFL') chapter do not apply. Applicability of the objectives and policies of the NFL chapter also requires clarification. It is noted that policy NU-P3 applies to outstanding natural features and significant landscapes, and high natural character areas and significant amenity features. Notwithstanding some of these terms are not defined, the intent is that the Network Utilities chapter provide the policy consideration for effects on Natural Features and Landscapes. Specific to the National Grid, policy NU-P6 provides a specific 'seek to avoid' policy approach in respect of development of the National Grid.</p> <p>Should policy NLF-P3 apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. Potential wording is provided in NU-P6 as sought to be amended through this submission.</p>	Should policy NLF-P3 apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. Potential wording is provided in NU-P6 as sought to be amended through this submission.
Transpower New Zealand Limited	NFL - Natural Features and Landscape /Policies /NFL-P4: Protection of special character landscapes	99.91	Amend	<p>Clarification is sought on the relationship between the NFL chapter and the NU chapter. Based on the introductory text to the Network Utilities chapter, it is assumed the rules in the Natural Features and Landscapes ('NFL') chapter do not apply. Applicability of the objectives and policies of the NFL chapter also requires clarification. It is noted that policy NU-P3 applies to outstanding natural features and significant landscapes, and high natural character areas and significant amenity features. Notwithstanding some of these terms are not defined, the intent is that the Network Utilities chapter provide the policy consideration for effects on Natural Features and Landscapes. Specific to the National Grid, policy NU-P6 provides a specific 'seek to avoid' policy approach in respect of development of the National Grid.</p> <p>Should policy NLF-P4 apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. Potential wording is provided in NU-P6 as sought to be amended through this submission.</p>	Should policy NLF-P4 apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. Potential wording is provided in NU-P6 as sought to be amended through this submission. The policy title of NFL-P4 requires amendment to replace 'protection' with 'minimise' to more correctly articulate the policy wording.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NFL - Natural Features and Landscape /Policies /NFL-P7: Manage the effects of network utilities	99.92	Oppose	Clarification is sought on the relationship between the NFL chapter and the NU chapter. Based on the introductory text to the Network Utilities chapter, it is assumed the rules in the Natural Features and Landscapes ('NFL') chapter do not apply. Applicability of the objectives and policies of the NFL chapter also requires clarification. It is noted that policy NU-P3 applies to outstanding natural features and significant landscapes, and high natural character areas and significant amenity features. Notwithstanding some of these terms are not defined, the intent is that the Network Utilities chapter provide the policy consideration for effects on Natural Features and Landscapes. Specific to the National Grid, policy NU-P6 provides a specific 'seek to avoid' policy approach in respect of development of the National Grid. Transpower seeks deletion of NFL-P7. Should policy NLF-P7 be retained or apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. The directive "avoid" wording within NFL-P7 does not give effect to the NPSET. Potential wording is provided in NU-P6 as sought to be amended through this submission.	Delete NFL-P7. Should policy NLF-P7 be retained or apply to the National Grid, Transpower seeks amendment to the policy to give effect to the 'seek to avoid' policy directive in NPSET Policy 8. The directive "avoid" wording within NFL-P7 does not give effect to the NPSET. Potential wording is provided in NU-P6 as sought to be amended through this submission.
Transpower New Zealand Limited	NFL - Natural Features and Landscape /NFL - Natural Features and Landscapes - Rules Table /	99.93	Amend	The relationship and applicability between the NFL chapter and the NU chapter is required. Based on the introductory text to the NU chapter, it is assumed that the rules of the NFL chapter to not apply. If this is not the case, this requires clarification as this is potentially contradictory to the above statement in the NFL chapter.	Amend the introductory text to the NFL rules as follows: All rules apply throughout the city and are in addition to the specific zone, precinct, overlay, and district-wide rules unless otherwise stated. <u>However the rules do not apply to Network Utilities. Instead Network Utilities are managed under the Network Utilities Chapter.</u>
Transpower New Zealand Limited	NFL - Natural Features and Landscape /NFL - Natural Features and Landscapes - Rules Table /NFL-R2: Buildings or structures within an outstanding natural feature and special character feature	99.94	Oppose	Based on the introductory text of the NU chapter, it is assumed that the NFL chapter does not apply to the NU chapter. If this is not the case, this requires clarification. Should Rule NLF-R2 apply to the National Grid, Transpower seeks amendment to the rule on the basis a non complying activity status for the development of the National Grid does not give effect to the NPSET.	Should Rule NLF-R2 apply to the National Grid, Transpower seeks amendment to the rule on the basis a non complying activity status for the development of the National Grid does not give effect to the NPSET.
Transpower New Zealand Limited	NFL - Natural Features and Landscape /NFL - Natural Features and Landscapes - Rules Table /NFL-R3: Buildings or structures within a special character landscape (excluding the Special Purpose Airport Zone)	99.95	Support	Based on the introductory text to the Network Utilities chapter, it is assumed the rules in the Natural Features and Landscapes ('NFL') chapter do not apply. If this is not the case, this requires clarification. Should Rule NLF-R3 apply to the National Grid, Transpower accepts the default restricted discretionary activity status.	Should Rule NLF-R3 apply to the National Grid, Transpower accepts the default restricted discretionary activity status.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Transpower New Zealand Limited	NFL - Natural Features and Landscape /Assessment criteria /NFL-AC2: Buildings or structures within an outstanding natural feature and special character feature (NFL-R1); Buildings or structures within a special character landscape (NFL-R2)	99.96	Amend	<p>Based on the introductory text to the Network Utilities chapter, it is assumed the rules in the Natural Features and Landscapes ('NFL') chapter do not apply. If this is not the case, this requires clarification.</p> <p>Based on the above, should the NLF chapter apply to the National Grid, Transpower seeks amendment to the assessment criteria to include operational or functional need.</p>	<p>Amend NFL-AC2 as follows:NFL-AC2: Buildings or structures within an outstanding natural feature and special character feature (NFL-R1); Buildings or structures within a special character landscape (NFL-R2)</p> <p>Visual impact and landscape values</p> <p>a. The extent to which the location, scale, height, design, external appearance, and overall form of the building or structure is appropriate to the landscape context.</p> <p>b. Whether the colours and material used for roofs, walls, and windows are of low reflectivity and integrate with the surrounding landscape.</p> <p>c. Whether there are any practical alternatives to the location of the building or structure, and <u>any operational or functional needs.</u></p> <p>...</p>