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18 May 2026

Hearing Panel
Proposed Kaipara District Plan
Kaipara District Council

Delivered via email to: mwalters@kaipara.govt.nz

Dear Sir/Madam

For the Attention of the Hearing Panel – Proposed Kaipara District Plan:

- **Hearing 17 – Ecosystems and Indigenous Biodiversity**
- **Hearing 18 – Natural Character**
- **Hearing 19 – Natural Features and Landscapes**

Hearing Statement by Transpower New Zealand Ltd (submitter reference 292)

Transpower New Zealand Limited ('Transpower') writes in relation to the Proposed Kaipara District Plan ('Kaipara PDP'), and Hearing Streams 17, 18 and 19 on Natural Environment Values, commencing on 8 June 2026. Transpower has submitted on the Natural Environment chapters and is being heard within the topics in this hearing stream.

Transpower lodged 17 original submissions points to the above hearing streams and is generally accepting of the Section 42A officer's recommendation. Specific responses to individual submission points are provided in the attached table. By way of summary, Transpower supports general reliance on the Infrastructure ('INF') chapter, noting the specific provisions and policy framework and broader integration issues will be addressed at the INF hearing (Hearing 32 Energy, Infrastructure and Transport).

Given the confined nature of Transpower's interest in the Natural Environment hearings topic, and the intention to address the primary integration issues at the INF Hearing, Transpower does not intend to appear before the panel and provide hearing evidence at this hearing. Rather, it respectfully requests that this letter be tabled for the Panel's consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

Transpower confirms it will prepare evidence and for, and attend the subsequent hearing tranches where its more substantive submission points will be considered.

The following provides an overview of the submission points of relevance to this hearing, and response to the Section 42A Report (s42A Report) recommendations.

Submission and Further Submission Points

Specific to this tranche of hearing topics, Transpower lodged seventeen submission points and six further submission points. A summary of the original points (and Transpower's relief sought) is set out below:

292.59, 292.60 and 292.78 – General points seeking amendment to the ECO Chapter (General approach, ECO-P1 and ECO-P2) to give effect to the National Policy Statement on Electricity Transmission, including clarification of the application of the provisions to the National Grid.

292.61 – Support for ECO-P3.

292.62 – General support for ECO-R1 and amendment to include reference to 'minor upgrading' and 'associated access tracks'.

292.63 – Support for ECO-R2.

292.64, 292.79 and 292.80 – General support for NATC-P1, NATC-P2 and NATC-P3 and amendment to recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission.

292.65 - Support for NATC-R1.

292.66 – General support for NATC-R4 and amendment to provide for the operation and minor upgrade and inclusion of infrastructure.

292.81 – Support for NTC-R2.

292.82 – Support for NATC-R3.

292.67 – Amendment to NFL-P5 to recognise the National Grid and give effect to the NPS-ET, and provide reconciliation with the National Grid specific policy INF-P10.

292.68, 292.83 and 292.84 – Amendment to NFL-R2, NFL-R3 and NFL-R4 to provide clarity a discretionary activity status (as opposed to non-complying) applies to regionally significant infrastructure.

Response to S42A Report recommendations

Transpower has carefully reviewed the s42A Report recommendations and as outlined in the attached table, supports/accepts the s42 Report recommendations on all the Transpower original submission points on the basis that these will be addressed at the Infrastructure Hearing.

At this stage, Transpower notes the s42A report recommendations and considers the matter (i.e. the relationship between the various chapters and provisions) is best addressed comprehensively at the INF chapter hearing (Hearing 32 Energy, Infrastructure and Transport). Transpower accepts (and agrees with the s42A report) that outright exceptions may not be required within the Natural Environment Chapters provided the relevant INF policies sufficiently recognise and provide for the National Grid.

Transpower also notes that within the Natural Features and Landscapes Chapter there are a number of rules, specific to Regionally Significant Infrastructure ("RSI") being retained (NFL-R2, NFL-R3 and NFL-R4). While Transpower is not opposed to this approach, Policy NFL-P5 which relates to RSI is being deleted. The District Plan needs to ensure there is an accompanying policy directive for the RSI rules, and the District Plan needs to clearly signpost to the INF chapter with policy directive. Transpower supports the discretionary activity status within the NATC rules.

Hearing appearance

As noted above, given the confined nature of Transpower's interest to the hearing topic and the nature of the officer recommendations referring to the IINF Chapter, Transpower does not intend to appear before the panel and provide hearing evidence. Rather it respectfully requests that this letter be tabled for the Panel's consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

For clarity, Attachment A to this letter outlines the relief sought by Transpower, the s42A response, and Transpower's response and reasoning to the recommendations.

Should the Panel see benefit in Transpower appearing before the Panel in relation to this tabled statement, Transpower can readily make itself available.

Should the Panel require clarification on any matter, please contact Daniel Hamilton at Transpower on the following email: environment.policy@transpower.co.nz.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Daniel Hamilton', written in a cursive style.

Daniel Hamilton

Strategic Planning Lead

TRANSPOWER NEW ZEALAND LIMITED

Sub Point	Plan Provision	Summary of Transpower Submission	S42A Recommendation (as taken from the S42A Report) Changes recommended through the S42A Report are shown as red text	Response to S42A Recommendation								
292.59	General Approach	<p>Relief sought: Amend Amend the Ecosystems and Indigenous Biodiversity chapter to give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought by the submission.</p> <p>Reasoning: Managing the effects of vegetation on the National Grid is required to reduce risks to the National Grid. There is a legal requirement to maintain its lines to minimise tree interruption to the supply of electricity. The identification of rules relating to indigenous vegetation are relevant to Transpower (as they determine the need for consent under the National Environmental Standards for Electricity Transmission Activities).</p>	<p>Reject 60. Transpower [292.59] supports the ECO Chapter in principle but considers that changes are required to give effect to the NPS-ET (now NPS-EN) and to recognise that Transpower has a legal requirement to manage effects of vegetation on the National Grid to minimise tree interruption to the supply of electricity. More specifically, Transpower requests amendments to the following provisions:</p> <p>a. Amend ECO-P1 and ECO-P2 to clarify that these policies do not apply to the National Grid or amend the policies to appropriately recognise the National Grid. Transpower notes that there is currently misalignment with the Infrastructure Chapter policies, specifically INF-P10. Transpower also consider that it is not appropriate to apply the offsetting and compensation requirement in ECO-P2 to the National Grid as this is inconsistent with both the NPS-EN and NPS-IB [292.60 and 292.78].</p> <p>b. Amend ECO-R1.1(l) to refer to ‘minor upgrading’, not just operation, repair and maintenance of the listed lawfully established activities. Transpower notes that “minor upgrading” is a defined term in the PDP and the change is therefore limited in scope by this definition [292.62].</p> <p>c. Amend ECO-R1.1(l)(ii) to refer to ‘infrastructure and associated access tracks’. Although Transpower acknowledge that access tracks may be provided for by other clauses in this rule, this specific amendment is requested for the avoidance of doubt [292.62].</p> <p>62. Firstly, I note that the NPS-ET has been replaced by the NPS-EN and the NES-ETA is being amended to be the NES-ENA. These new regulations are likely to come into force during 2026. Any submission points and provisions relating to the National Grid will therefore need to consider and give effect to that new and amended national direction (where practicable and within scope), including the provisions in the Infrastructure Chapter.</p> <p>63. As notified, INF-P10 in the Infrastructure Chapter is one of two policies that enable development and upgrading of the National Grid. INF-P10.8 explicitly states that “In the event of any conflict with any other policies within the plan, INF-P10 take precedence.” My understanding (after discussions with the Infrastructure Chapter reporting officer) is that the wording of INF-P10 has been developed in conjunction with Transpower to act as a “one stop shop” policy that prevails over other potentially conflicting policies in district wide chapters in the PDP, such as the ECO Chapter, where such conflicts cannot be reconciled. By including clear direction in INF-P10 that it takes precedence over other conflicting policies, it avoids the need for multiple exemptions for the National Grid in the policies of other district wide chapters in the PDP. In my view, this is an appropriate and efficient drafting approach as it allows the Infrastructure Chapter policies on the National Grid to address potential conflicts with other policies. As such, I do not consider that explicit exemptions from ECO-P1 and ECO-P2 for the National Grid are appropriate or necessary.</p>	<p>Transpower accepts outright exceptions may not be required within the ECO Chapter provided the relevant INF policies sufficiently provide for National Grid.</p> <p>Transpower remains supportive of the ‘prevail’ directive in INF-P10 and does not consider the NPS-EN requires a change to this approach. However this will be addressed at the Infrastructure Chapter.</p>								
292.60	ECO-P1	<p>Relief Sought: AMEND ECO-P1 to clarify that it does not apply to the National Grid. OR AMEND ECO-P1 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought by the submission.</p> <p>Reasoning: As drafted, ECO-P1 would apply to the National Grid and there is no reconciliation with the National Grid specific policy INF-P10, or any other policies in the Infrastructure chapter.</p>	<p>62. Firstly, I note that the NPS-ET has been replaced by the NPS-EN and the NES-ETA is being amended to be the NES-ENA. These new regulations are likely to come into force during 2026. Any submission points and provisions relating to the National Grid will therefore need to consider and give effect to that new and amended national direction (where practicable and within scope), including the provisions in the Infrastructure Chapter.</p> <p>63. As notified, INF-P10 in the Infrastructure Chapter is one of two policies that enable development and upgrading of the National Grid. INF-P10.8 explicitly states that “In the event of any conflict with any other policies within the plan, INF-P10 take precedence.” My understanding (after discussions with the Infrastructure Chapter reporting officer) is that the wording of INF-P10 has been developed in conjunction with Transpower to act as a “one stop shop” policy that prevails over other potentially conflicting policies in district wide chapters in the PDP, such as the ECO Chapter, where such conflicts cannot be reconciled. By including clear direction in INF-P10 that it takes precedence over other conflicting policies, it avoids the need for multiple exemptions for the National Grid in the policies of other district wide chapters in the PDP. In my view, this is an appropriate and efficient drafting approach as it allows the Infrastructure Chapter policies on the National Grid to address potential conflicts with other policies. As such, I do not consider that explicit exemptions from ECO-P1 and ECO-P2 for the National Grid are appropriate or necessary.</p>									
292.78	ECO-P2	<p>Relief sought: AMEND ECO-P2 to clarify that it does not apply to the National Grid. OR AMEND ECO-P2 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought by the submission.</p> <p>Reasoning: As drafted, ECO-P2 would apply to the National Grid and there is no reconciliation with the National Grid specific policy INF-P10, or any other policies in the Infrastructure chapter. ECO-P2 also applies an offsetting and compensation requirement which is not appropriate to apply to the National Grid given the National Policy</p>	<table border="1" data-bbox="1172 1486 2318 1755"> <tr> <td data-bbox="1172 1486 1353 1562">ECO-01</td> <td data-bbox="1353 1486 2318 1562">Protection of significant indigenous vegetation and significant habitats of indigenous fauna</td> </tr> <tr> <td colspan="2" data-bbox="1172 1562 2318 1633">Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected for current and future generations¹.</td> </tr> <tr> <td data-bbox="1172 1633 1353 1688">ECO-02</td> <td data-bbox="1353 1633 2318 1688">Maintenance of indigenous biodiversity</td> </tr> <tr> <td colspan="2" data-bbox="1172 1688 2318 1755">Adverse effects on indigenous biodiversity are managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.</td> </tr> </table>	ECO-01	Protection of significant indigenous vegetation and significant habitats of indigenous fauna	Areas of significant indigenous vegetation and significant habitats of indigenous fauna are protected for current and future generations¹ .		ECO-02	Maintenance of indigenous biodiversity	Adverse effects on indigenous biodiversity are managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.		
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ECO-02	Maintenance of indigenous biodiversity											
Adverse effects on indigenous biodiversity are managed to maintain its extent and diversity in a way that provides for the social, economic and cultural well-being of people and communities.												

		Statement on Electricity Transmission has no such policy directive and the National Policy Statement on Indigenous Biodiversity does not apply to electricity transmission.		
292.61	ECO-P3	<p>Relief sought: Support RETAIN ECO-P3 as notified. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: The submitter supports the recognition of the functional or operational need of regionally significant infrastructure in subclause 2 of the policy.</p>	<p>Accept in part</p> <p>64. <i>With respect to referring to all infrastructure vs regionally significant infrastructure, there has been a key change in national direction since notification. The NPS-I is focused on enabling “infrastructure” (as defined in the RMA) and also includes “additional infrastructure” (as defined in the NPS-I) as well as activities that are either ancillary to, or supporting, infrastructure. . In the content of submissions on ECO-P3(2), the most relevant provision in the NPS-I is Policy 2, which provides broad direction to decision-makers to recognise and provide for the operational need and functional need of infrastructure to be in particular locations and environments. I consider that ECO-P3(2) is broadly aligned with this direction in the NPS-I but recommend it be amended to refer to infrastructure more generally (rather than regionally significant infrastructure) to improve alignment. As such, I agree with Northpower that a more general reference to “infrastructure” in ECO-P3.2 is appropriate.</i></p> <p>71. <i>I recommend that:</i></p> <p>ECO-P3 is amended as follows: “Manage subdivision, land use and development to protect significant indigenous vegetation and significant habitat of indigenous fauna and maintain indigenous biodiversity in a way that:</p> <ol style="list-style-type: none"> 1. Does not unreasonably restrict existing primary production activities, particularly on highly productive land; 2. Recognises the operational need or functional need of regionally significant infrastructure to traverse or locate within areas of significant indigenous vegetation and significant habitat of indigenous fauna where there are no practicable alternative locations; 3. Allows for operation, use, <u>repair</u> and maintenance of existing structures, including infrastructure; and 4. Enables land to be used and developed to support the social, economic and cultural well-being of people and communities.” 	Support the recommendation on the basis that the policy is retained largely as notified, specifically the reference to operational need <u>or</u> functional need.
292.62	ECO-R1	<p>Relief Sought: RETAIN ECO-R1. AND AMEND ECO-R1.1.i. as follows: i. Clearance for the operation, repair, minor upgrading or maintenance of the following activities where they have been lawfully established: i. Fences; ii. Infrastructure and associated access tracks; iii. Buildings; ... AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: Transpower supports clause 1.i.ii of ECO-R1 as it appropriately provides a permitted activity status for operation, maintenance, or repair of infrastructure.</p> <p>An amendment is sought to include reference to ‘minor upgrading’ noting the associated definition and very confined nature of works this would capture.</p> <p>A minor amendment is also sought to include reference to ‘associated access tracks.’ While these are potentially captured by other clauses, their inclusion is sought for the avoidance of doubt.</p>	<p>Accept in part.</p> <p>67. <i>Northpower and Transpower both request that ECO-R1.1(i) be amended to provide an exemption for “upgrading” and “minor upgrading” respectively. The purpose of ECO-R1 is to provide for a discrete number of activities and purposes where indigenous vegetation clearance can be justified without being subject to the thresholds set in ECO-R2. For an activity to be permitted under ECO-R1, there needs to be reasonable certainty that the associated indigenous vegetation clearance will be limited, either by the purpose of the activity or by the scale of the activity, to ensure the rule does not permit an activity with significant adverse effects.</i></p> <p>68. <i>In the case of infrastructure, the permitted vegetation clearance associated with the operation, repair or maintenance of lawfully established infrastructure is limited in its potential spatial extent by the physical footprint of the infrastructure. Including “upgrading” of infrastructure in ECO-R1.1(i), as requested by Northpower, could potentially involve extensive indigenous vegetation clearance depending on the nature of the upgrade and the new footprint of the upgraded infrastructure. I therefore do not recommend including upgrade of infrastructure as a permitted pathway for indigenous vegetation clearance within ECO-R1.</i></p> <p>69. <i>The request from Transpower to include “minor upgrading” in ECO-R1.1.i could potentially mitigate this risk as the PDP currently defines “minor upgrading” as utilising existing structures and networks and/or structures and networks of a similar scale and character, which inherently limits the potential extent of indigenous vegetation clearance. However, I anticipate that this definition will need to be amended to align with the new definition of “maintenance and minor upgrading” in the NPS-I and “routine activities” in the NPS-ENA. I also consider that a threshold of being a “similar scale and character” could be difficult to apply as a permitted activity pathway for indigenous vegetation clearance associated with the upgrading of existing infrastructure. I also note that the NES-ETA (which is being amended by the NES-ENA likely to come into force this year) includes rules for indigenous vegetation clearance associated with electricity transmission activities (including replacing and relocating support structures) on existing National Grid assets which prevail over the PDP. I therefore do not anticipate that ECO-R1.1 will cause any undue consenting issues for Transpower. I therefore do not recommend that “minor upgrade” is added</i></p>	<p>Support the recommendation on the basis it recommends amendment to give partial effect to the relief sought in the Transpower submission.</p> <p>On the basis ECO-R1 applies outside SNAs (as these are not identified in the PDP), that the NES-ETA regulates vegetation clearance associated with existing transmission assets, and likely changes to the NES, Transpower accepts the officer recommendation to not include reference to ‘minor upgrading’ in the rule.</p>

			<p>to in ECO-R1.1(l).</p> <p>70. However, I agree with Transpower that “associated access tracks” should be included in ECOR1.1(l) as infrastructure providers need access to infrastructure to ensure it is maintained and operating properly, and it is consistent with other listed exemptions in ECO-R1.1 for existing walking, cycling and farming tracks.</p> <p>ECOR1.1(l)(ii):</p> <table border="1" data-bbox="1175 394 2329 835"> <tr> <td data-bbox="1175 394 1359 835"></td> <td data-bbox="1359 394 1843 835"> <p>I. Clearance for the operation, repair or maintenance of the following activities where they have been lawfully established:</p> <ul style="list-style-type: none"> i. Fences; ii. Infrastructure and associated access tracks¹⁴; iii. Buildings; iv. Driveways and access; v. Walking tracks; vi. Cycling tracks; vii. Farming tracks; and viii. Farm drains. </td> <td data-bbox="1843 394 2329 835"></td> </tr> </table>		<p>I. Clearance for the operation, repair or maintenance of the following activities where they have been lawfully established:</p> <ul style="list-style-type: none"> i. Fences; ii. Infrastructure and associated access tracks¹⁴; iii. Buildings; iv. Driveways and access; v. Walking tracks; vi. Cycling tracks; vii. Farming tracks; and viii. Farm drains. 		
	<p>I. Clearance for the operation, repair or maintenance of the following activities where they have been lawfully established:</p> <ul style="list-style-type: none"> i. Fences; ii. Infrastructure and associated access tracks¹⁴; iii. Buildings; iv. Driveways and access; v. Walking tracks; vi. Cycling tracks; vii. Farming tracks; and viii. Farm drains. 						
292.63	ECO-R2	<p>Relief Sought: RETAIN ECO-R2 as notified. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: The submitter supports this rule.</p>	<p>Accept in part [Discussions around submissions] Madara Vilde [125.6, 125.14], Fish & Game [267.8], NRC [332.21], Aoroa Farms [337.4], Cato Bolam [217.44] and DOC [304.74] are all concerned that ECO-R2 is too permissive, particularly the permitted thresholds and associated “per calendar year” temporal control. Due to its permissiveness, these submitters consider that ECO-R2 is not aligned with the NPS-IB or RPS and will result in significant cumulative adverse effects on indigenous biodiversity over the life of the PDP. These submitters request a range of alternative thresholds and associated timeframes for ECO-R2 as follows:</p> <p>...</p> <p>179. In my view, these revised thresholds are more appropriate and effective in giving effect to the higher order documents while also not being overly onerous based on the range of considerations outlined above. I do not recommend that the thresholds are amended to apply over the life of the PDP or 10 years as suggested by submitters. Extending the thresholds to apply over this timeframe becomes more complex and challenging to monitor and enforce and I expect the risk of landowners incrementally clearing indigenous vegetation each calendar year is likely to be low given this rule will typically apply when land is being developed through subdivision.</p> <p>The clearance thresholds in ECO-R2.1(a) and (b) are amended as follows:</p> <p>i. “a. It does not exceed 1,000500m² per site in any calendar year in the Māori purpose zone, General rural zone, and Rural lifestyle zone; or</p> <p>ii. b. It does not exceed 500250m² per site in any calendar year in all other zones”.</p> <p>The requirement to include an ecological assessment in ECO-R2.2 is deleted and a new matter of discretion requiring consideration of the criteria in Appendix 5 of the RPS (Areas of significant indigenous vegetation and significant habitats of indigenous fauna) is inserted into ECO-R2.3</p>	<p>On the basis of ECO-R1, and the NES-ETA, Transpower accepts the officer’s recommendation to amend the area thresholds (on the basis the site and calendar year thresholds are retained).</p>			

Natural Character:				
Sub Point	Plan Provision	Summary of Transpower Submission	S42A Recommendation (as taken from the S42A Report) Changes recommended through the S42A Report are shown as red text	Response to S42A Recommendation
292.64	NATC-P1	<p>Relief Sought: AMEND NATC-P1 to clarify that it does not apply to the National Grid. OR AMEND NATC-P1 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: Policy INF-P10 is intended to prevail in the event of conflict between it and any other policy in the Proposed District Plan. As drafted, NATC-P1 could be interpreted to apply to the National Grid (as it is a use of land) when they do not. The submitter supports the recognition of the functional or operational need for buildings or structures to sometimes be located in areas of natural character. The submitter seeks amendment to these policies to give effect to the National Policy Statement on Electricity Transmission, and specifically Policy 8 of the National Policy Statement on Electricity Transmission which requires a 'seek to avoid' approach for new National Grid assets.</p>	<p>Reject</p> <p>7.2.1 Relationship between NATC policies and National Grid policies in the Infrastructure chapter</p> <p>90. Transpower [292.64, 292.79 and 292.80] requests either clarification that NATC-P1, P2 and P3 do not apply to the National Grid or amendments to the policies to appropriately recognise the National Grid.</p> <p>91. As discussed earlier, the NPS-EN (formerly the NPS-ET) was amended in December 2025 after Transpower made its submission. There have been significant changes to relevant national direction policies since then.</p> <p>92. I assume Transpower's key concern in relation to the NATC policies is the directive to avoid significant adverse effects on the natural character of freshwater margins (NATC-P1) and the constraint this may have on the National Grid. In my opinion the direction to 'avoid significant adverse effects' is not, of itself, inconsistent with the NPS-EN, which does not direct a blanket carve-out for the National Grid from natural character considerations.</p> <p>93. Any potential conflict with NATC policies (i.e. if significant effects cannot be avoided) is resolved in the PDP through the Infrastructure chapter, which includes National Grid-specific policies, and INF-P10, which directs that the National Grid policies prevail where there is a conflict with other PDP policies. On that basis, the NATC policies can continue to apply generally, with the Infrastructure chapter providing the specific, prevailing direction where conflicts arise. In my view, amendments to NATC-P1, NATC-P2 or NATC-P3 are not required to achieve this outcome.</p> <p>94. However, I note that, given the recent and significant amendments to the NPS-EN, Transpower may now hold a different view from that expressed in its submission regarding how the PDP provides for the National Grid. I am therefore open to revisiting my recommendation in light of any updated information or advice.</p>	<p>At this stage Transpower accepts the recommendation (to not explicitly exempt the National Grid from the policies) noting this matter is best addressed at the infrastructure hearing given the bespoke National Grid Policy INF-P10.</p> <p>Transpower remains supportive of the 'prevail' directive in INF-P10 and does not consider the NPS-EN requires a change to this approach.</p>
292.79	NATC-P2	<p>Relief Sought: AMEND NATC-P2 to clarify that it does not apply to the National Grid. OR AMEND NATC-P2 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: As above for submission point 292.64</p>		
292.80	NATC-P3	<p>Relief Sought: AMEND NATC-P3 to clarify that it does not apply to the National Grid. OR AMEND NATC-P3 to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission. AND</p>		

		Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission. Reasoning: As above for submission point 292.64								
292.65	NATC-R1	Relief Sought: RETAIN NATC-R1 as notified. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission. Reasoning: The submitter supports these rules, in particular the activity status for new National Grid assets in these rules.	Accept in part 8.2.6 NATC-R1 <i>175. NATC-R1 sets out the rules for additions, alterations and maintenance of buildings and structures within freshwater margins.</i> <i>176. Submissions in support of retaining NATC-R1 as notified include Horizon Surveying & Land Development [315.27], Transpower [292.65] and Clarus [309.63].</i> ... <i>187. In my opinion, there is an issue with NATC-R1 in that it does not place an overall limit on the cumulative extent of additions. While it provides for additions of up to 30 m² as a permitted activity, it would, in theory, allow multiple additions to be undertaken over time, resulting in a building or structure that is significantly larger than that anticipated for new buildings and structures under NATC-R2.</i> <i>188. In my view, NATC-R1.1 should include an additional requirement that the cumulative area of additions does not exceed the maximum area limits specified in NATC-R2. However, I note that no submissions have sought this change. I raise this matter in the event that scope is identified through submissions, in which case my recommendation would be to include such an additional control.</i>	Transpower accepts the s42A report recommendation, noting existing National Grid assets are regulated by the NES-ETA.						
			<table border="1"> <thead> <tr> <th>NATC-R1</th> <th colspan="2">Additions and alterations and maintenance of buildings and structures in wetland, lake and river margins</th> </tr> </thead> <tbody> <tr> <td>All zones</td> <td> 1. Activity status: Permitted Where: a. External additions and alterations: i. Are no greater than 30m²; and ii. Comply The activity complies with NATC-S1CE-S1 Coastal environment - maximum building height; <u>or</u> b. <u>External additions or alterations are to an existing lawfully established above ground network utility, and:</u> i. <u>Are no greater than 10m high or the height of the existing building or structure; and</u> ii. <u>Are no greater than 20% of the gross floor area of the existing building or structure; and</u> iii. <u>Do not involve replacing a pole with a pi pole.</u> </td> <td> 2. Activity status when compliance not achieved: <u>Restricted discretionary</u> <u>Discretionary</u> 3. Matters over which discretion is restricted: a. <u>The matters in NATC-P5; and</u> b. <u>The positive effects of the activity.</u> </td> </tr> </tbody> </table>	NATC-R1	Additions and alterations and maintenance of buildings and structures in wetland, lake and river margins		All zones	1. Activity status: Permitted Where: a. External additions and alterations: i. Are no greater than 30m ² ; and ii. Comply The activity complies with NATC-S1CE-S1 Coastal environment - maximum building height; <u>or</u> b. <u>External additions or alterations are to an existing lawfully established above ground network utility, and:</u> i. <u>Are no greater than 10m high or the height of the existing building or structure; and</u> ii. <u>Are no greater than 20% of the gross floor area of the existing building or structure; and</u> iii. <u>Do not involve replacing a pole with a pi pole.</u>	2. Activity status when compliance not achieved: <u>Restricted discretionary</u> <u>Discretionary</u> 3. Matters over which discretion is restricted: a. <u>The matters in NATC-P5; and</u> b. <u>The positive effects of the activity.</u>	
NATC-R1	Additions and alterations and maintenance of buildings and structures in wetland, lake and river margins									
All zones	1. Activity status: Permitted Where: a. External additions and alterations: i. Are no greater than 30m ² ; and ii. Comply The activity complies with NATC-S1CE-S1 Coastal environment - maximum building height; <u>or</u> b. <u>External additions or alterations are to an existing lawfully established above ground network utility, and:</u> i. <u>Are no greater than 10m high or the height of the existing building or structure; and</u> ii. <u>Are no greater than 20% of the gross floor area of the existing building or structure; and</u> iii. <u>Do not involve replacing a pole with a pi pole.</u>	2. Activity status when compliance not achieved: <u>Restricted discretionary</u> <u>Discretionary</u> 3. Matters over which discretion is restricted: a. <u>The matters in NATC-P5; and</u> b. <u>The positive effects of the activity.</u>								
292.66	NATC-R4	Relief Sought: AMEND NATC-R4.1. as follows: Where: a. The activity complies with NATC-S3 - Indigenous vegetation clearance; or	Accept in part <i>I support enabling indigenous vegetation clearance for the operation, maintenance, repair, upgrading and removal of existing infrastructure, as this is consistent with the PDP and NPS-I policy direction for enabling infrastructure. It is in my opinion one of the limited circumstances where a greater level of clearance is appropriate.</i> <i>I recommend adopting the same wording as I recommended to include in NATC-P2:</i>	Transpower accepts the s42A report recommendation, noting existing National Grid assets are regulated by the NES-ETA.						

		<p>b. The indigenous vegetation clearance is for the maintenance, <u>operation and minor upgrade</u> of lawfully established <u>infrastructure</u>, roads, fences, utility connections, driveways, parking areas, effluent disposal systems, swimming pools, walking or cycling tracks, or farm and forestry tracks.</p> <p>AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: The application of this rule should be extended to include operation and minor upgrade and to include infrastructure.</p>	<p><u><i>“The upgrade, operation, maintenance, repair or removal of existing infrastructure”</i></u></p> <p><i>In my opinion, indigenous vegetation clearance for these purposes should be limited to a maximum of 50m2 for the reasons discussed earlier in this section.</i></p> <p><i>Note - my recommendation to adopt this wording in NATC-P2 is intended to align with the wording of policy INF-P1. As noted in my recommendation on NATC-P2, any amendment to INF-P1 may require consequential changes to NATC-P2 and, in turn, the wording of this clause in NATC-R4.</i></p> <p>Recommended:</p> <p>1. Activity status: Permitted Where:</p> <p><u><i>a. The maximum area of indigenous vegetation clearance is 25m2 within any 12-month period per site; The activity complies with NATC-S3 – Indigenous vegetation clearance; or</i></u></p> <p><i>b. The indigenous vegetation clearance is for the maintenance of lawfully established:</i></p> <ul style="list-style-type: none"> <i>i. roads,</i> <i>ii. fences,</i> <i>iii. network utility connections,</i> <i>iv. driveways,</i> <i>v. parking areas,</i> <i>vi. effluent disposal systems,</i> <i>vii. swimming pools,</i> <i>viii. walking or cycling tracks, or</i> <i>ix. farm and forestry tracks; or</i> <p><u><i>c. The maximum area of indigenous vegetation clearance is 50m2 within any 12-month period per site, and it is for:</i></u></p> <ul style="list-style-type: none"> <u><i>i. The upgrade, operation, maintenance, repair or removal of existing infrastructure,</i></u> <u><i>ii. Establishing infrastructure in a road, or</i></u> <u><i>iii. A track no greater than 1.5m wide</i></u> 	
292.81	NATC-R2	<p>Relief Sought: RETAIN NATC-R2 as notified. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: The submitter supports these rules, in particular the activity status for new National Grid assets in these rules.</p>	<p>Accept in part.</p> <p><i>190. Submissions in support of retaining NATC-R2 as notified include NZDF [284.18], Horizon Surveying & Land Development [315.109] and Transpower [292.81].</i></p>	<p>Transpower accepts the s42A report recommendation.</p>

			<table border="1"> <tr> <td data-bbox="1166 201 1338 233">NATC-R2</td> <td colspan="2" data-bbox="1338 201 2154 233">New building or structures in wetland, lake and river margins</td> </tr> <tr> <td data-bbox="1166 233 1338 1230">All zones</td> <td data-bbox="1338 233 1917 1230"> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. <u>The building or structure:</u></p> <p>i. <u>Is no greater than 50m²; and</u></p> <p>ii. <u>e- The activity complies with NATC-S1 Maximum building height; or</u></p> <p>b. a- <u>The building or structure:</u></p> <p>i. <u>is no greater than 1300m²;</u></p> <p>ii. <u>complies with NATC-S1 Maximum building height; and</u></p> <p>iii. <u>b- the building or structure is required for:</u></p> <p>a. <u>For natural hazard mitigation undertaken by, or on behalf of, the local authority; or</u></p> <p>b. <u>For the management, operation and maintenance of parks and reserves in the Open space zone or Sport and active recreation zone; or</u></p> <p>c. <u>A post and wire fence for the purpose of protection from farm stock; or</u></p> <p>d. <u>A river crossings, including but not limited to, fords, bridges, stock crossings and culvert crossings; or</u></p> <p>e. <u>Infrastructure for the taking of water from, or discharges to, the adjacent wetland, lake or river Pumphouses utilised for the drawing of water provided they cover less than 25m² in area; and</u></p> <p>f. <u>Underground infrastructure;</u></p> <p>g. <u>For sediment and erosion control;</u></p> <p>h. <u>For the construction of a river-crossing</u></p> <p>i. <u>A lighting pole by, or on behalf of the local authority;</u></p> <p>j. <u>A footpath and or paving no greater than 2m wide; or</u></p> <p>k. <u>Infrastructure within a road, provided any pole:</u></p> <p>a. <u>is a single pole (monopole), and</u></p> <p>b. <u>is not a pi-pole or a steel-lattice tower;</u></p> </td> <td data-bbox="1917 233 2154 1230"> <p>2. Activity status when compliance not achieved: Restricted Discretionary</p> <p>3. Matters over which discretion is restricted Where:</p> <p>a. The matters in NATC-P5; and</p> <p>b. The positive effects of the activity.</p> </td> </tr> </table>	NATC-R2	New building or structures in wetland, lake and river margins		All zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. <u>The building or structure:</u></p> <p>i. <u>Is no greater than 50m²; and</u></p> <p>ii. <u>e- The activity complies with NATC-S1 Maximum building height; or</u></p> <p>b. a- <u>The building or structure:</u></p> <p>i. <u>is no greater than 1300m²;</u></p> <p>ii. <u>complies with NATC-S1 Maximum building height; and</u></p> <p>iii. <u>b- the building or structure is required for:</u></p> <p>a. <u>For natural hazard mitigation undertaken by, or on behalf of, the local authority; or</u></p> <p>b. <u>For the management, operation and maintenance of parks and reserves in the Open space zone or Sport and active recreation zone; or</u></p> <p>c. <u>A post and wire fence for the purpose of protection from farm stock; or</u></p> <p>d. <u>A river crossings, including but not limited to, fords, bridges, stock crossings and culvert crossings; or</u></p> <p>e. <u>Infrastructure for the taking of water from, or discharges to, the adjacent wetland, lake or river Pumphouses utilised for the drawing of water provided they cover less than 25m² in area; and</u></p> <p>f. <u>Underground infrastructure;</u></p> <p>g. <u>For sediment and erosion control;</u></p> <p>h. <u>For the construction of a river-crossing</u></p> <p>i. <u>A lighting pole by, or on behalf of the local authority;</u></p> <p>j. <u>A footpath and or paving no greater than 2m wide; or</u></p> <p>k. <u>Infrastructure within a road, provided any pole:</u></p> <p>a. <u>is a single pole (monopole), and</u></p> <p>b. <u>is not a pi-pole or a steel-lattice tower;</u></p>	<p>2. Activity status when compliance not achieved: Restricted Discretionary</p> <p>3. Matters over which discretion is restricted Where:</p> <p>a. The matters in NATC-P5; and</p> <p>b. The positive effects of the activity.</p>		
NATC-R2	New building or structures in wetland, lake and river margins										
All zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. <u>The building or structure:</u></p> <p>i. <u>Is no greater than 50m²; and</u></p> <p>ii. <u>e- The activity complies with NATC-S1 Maximum building height; or</u></p> <p>b. a- <u>The building or structure:</u></p> <p>i. <u>is no greater than 1300m²;</u></p> <p>ii. <u>complies with NATC-S1 Maximum building height; and</u></p> <p>iii. <u>b- the building or structure is required for:</u></p> <p>a. <u>For natural hazard mitigation undertaken by, or on behalf of, the local authority; or</u></p> <p>b. <u>For the management, operation and maintenance of parks and reserves in the Open space zone or Sport and active recreation zone; or</u></p> <p>c. <u>A post and wire fence for the purpose of protection from farm stock; or</u></p> <p>d. <u>A river crossings, including but not limited to, fords, bridges, stock crossings and culvert crossings; or</u></p> <p>e. <u>Infrastructure for the taking of water from, or discharges to, the adjacent wetland, lake or river Pumphouses utilised for the drawing of water provided they cover less than 25m² in area; and</u></p> <p>f. <u>Underground infrastructure;</u></p> <p>g. <u>For sediment and erosion control;</u></p> <p>h. <u>For the construction of a river-crossing</u></p> <p>i. <u>A lighting pole by, or on behalf of the local authority;</u></p> <p>j. <u>A footpath and or paving no greater than 2m wide; or</u></p> <p>k. <u>Infrastructure within a road, provided any pole:</u></p> <p>a. <u>is a single pole (monopole), and</u></p> <p>b. <u>is not a pi-pole or a steel-lattice tower;</u></p>	<p>2. Activity status when compliance not achieved: Restricted Discretionary</p> <p>3. Matters over which discretion is restricted Where:</p> <p>a. The matters in NATC-P5; and</p> <p>b. The positive effects of the activity.</p>									
292.82	NATC-R3	<p>Relief Sought: RETAIN NATC-R3 as notified. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: The submitter supports these rules, in particular the activity status for new National Grid assets in these rules.</p>	<p>Accept in part. 199. Submissions in support of retaining NATC-R3 as notified include Horizon Surveying & Land Development [315.110] and Transpower [292.82].</p>		<p>Transpower accepts the s42A report recommendation, noting earthworks associated with existing assets are regulated by the NES-ETA.</p>						

			<table border="1"> <tr> <td>NATC-R3</td> <td colspan="2">Earthworks in wetland, lake and river margins</td> </tr> <tr> <td>All zones</td> <td> <p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The earthworks:</p> <p>i. <u>Does not exceed a cut height or fill depth of 2m. Complies with NATC-S2—Earthworks;</u> and</p> <p>ii. <u>Does not exceed 50m³ within in any 12-month period per site; or and</u></p> <p>b. The earthworks is for the maintenance of lawfully established:</p> <p>i. roads,</p> <p>ii. fences,</p> <p>iii. <u>network</u> utility connections,</p> <p>iv. driveways,</p> <p>v. parking areas,</p> <p>vi. effluent disposal systems,</p> <p>vii. swimming pools,</p> <p>viii. walking or cycling tracks, or</p> <p>ix. farm and forestry tracks; <u>or</u></p> <p>c. <u>The earthworks:</u></p> <p>i. <u>Does not exceed a cut height or fill depth of 2m;</u></p> <p>ii. <u>Does not exceed 100m³ within any 12-month period per site; and</u></p> <p>iii. <u>Is for the following purpose (including any associated access):</u></p> <p>(a) <u>Erosion and sediment control;</u></p> <p>(b) <u>The removal or management of pest plant and animal species;</u></p> <p>(c) <u>Restoration planting;</u></p> <p>(d) <u>The upgrade, operation, maintenance, repair or removal of existing infrastructure;</u></p> <p>(e) <u>Establishing infrastructure in a road;</u></p> <p>(f) <u>Natural hazard mitigation undertaken by, or on behalf of a local authority; or</u></p> <p>(g) <u>A track no greater than 1.5m wide.</u></p> </td> <td> <p>2. Activity status when compliance not achieved: Restricted Discretionary</p> <p>3. Matters over which discretion is restricted:</p> <p>a. The matters in NATC-P5; and</p> <p>b. The positive effects of the activity.</p> </td> </tr> </table>	NATC-R3	Earthworks in wetland, lake and river margins		All zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The earthworks:</p> <p>i. <u>Does not exceed a cut height or fill depth of 2m. Complies with NATC-S2—Earthworks;</u> and</p> <p>ii. <u>Does not exceed 50m³ within in any 12-month period per site; or and</u></p> <p>b. The earthworks is for the maintenance of lawfully established:</p> <p>i. roads,</p> <p>ii. fences,</p> <p>iii. <u>network</u> utility connections,</p> <p>iv. driveways,</p> <p>v. parking areas,</p> <p>vi. effluent disposal systems,</p> <p>vii. swimming pools,</p> <p>viii. walking or cycling tracks, or</p> <p>ix. farm and forestry tracks; <u>or</u></p> <p>c. <u>The earthworks:</u></p> <p>i. <u>Does not exceed a cut height or fill depth of 2m;</u></p> <p>ii. <u>Does not exceed 100m³ within any 12-month period per site; and</u></p> <p>iii. <u>Is for the following purpose (including any associated access):</u></p> <p>(a) <u>Erosion and sediment control;</u></p> <p>(b) <u>The removal or management of pest plant and animal species;</u></p> <p>(c) <u>Restoration planting;</u></p> <p>(d) <u>The upgrade, operation, maintenance, repair or removal of existing infrastructure;</u></p> <p>(e) <u>Establishing infrastructure in a road;</u></p> <p>(f) <u>Natural hazard mitigation undertaken by, or on behalf of a local authority; or</u></p> <p>(g) <u>A track no greater than 1.5m wide.</u></p>	<p>2. Activity status when compliance not achieved: Restricted Discretionary</p> <p>3. Matters over which discretion is restricted:</p> <p>a. The matters in NATC-P5; and</p> <p>b. The positive effects of the activity.</p>
NATC-R3	Earthworks in wetland, lake and river margins								
All zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. The earthworks:</p> <p>i. <u>Does not exceed a cut height or fill depth of 2m. Complies with NATC-S2—Earthworks;</u> and</p> <p>ii. <u>Does not exceed 50m³ within in any 12-month period per site; or and</u></p> <p>b. The earthworks is for the maintenance of lawfully established:</p> <p>i. roads,</p> <p>ii. fences,</p> <p>iii. <u>network</u> utility connections,</p> <p>iv. driveways,</p> <p>v. parking areas,</p> <p>vi. effluent disposal systems,</p> <p>vii. swimming pools,</p> <p>viii. walking or cycling tracks, or</p> <p>ix. farm and forestry tracks; <u>or</u></p> <p>c. <u>The earthworks:</u></p> <p>i. <u>Does not exceed a cut height or fill depth of 2m;</u></p> <p>ii. <u>Does not exceed 100m³ within any 12-month period per site; and</u></p> <p>iii. <u>Is for the following purpose (including any associated access):</u></p> <p>(a) <u>Erosion and sediment control;</u></p> <p>(b) <u>The removal or management of pest plant and animal species;</u></p> <p>(c) <u>Restoration planting;</u></p> <p>(d) <u>The upgrade, operation, maintenance, repair or removal of existing infrastructure;</u></p> <p>(e) <u>Establishing infrastructure in a road;</u></p> <p>(f) <u>Natural hazard mitigation undertaken by, or on behalf of a local authority; or</u></p> <p>(g) <u>A track no greater than 1.5m wide.</u></p>	<p>2. Activity status when compliance not achieved: Restricted Discretionary</p> <p>3. Matters over which discretion is restricted:</p> <p>a. The matters in NATC-P5; and</p> <p>b. The positive effects of the activity.</p>							

Natural Features and Landscapes				
Sub Point	Plan Provision	Summary of Transpower Submission	S42A Recommendation (as taken from the S42A Report) Changes recommended through the S42A Report are shown as red text	Response to S42A Recommendation
292.67	NFL-P5	<p>Relief Sought:</p> <p>AMEND NFL-P5 as follows:</p> <p>Enable the <u>development</u>, operation, maintenance and upgrading of regionally significant infrastructure, <u>other than the National Grid</u>, in Outstanding Natural Features or Outstanding Natural Landscapes where:</p> <p>1. There is an operational need or functional need to be in that particular location; and</p> <p>2. Adverse effects on the characteristics, qualities and values of Outstanding Natural Features and Outstanding Natural Landscapes are</p>	<p>Reject:</p> <p>142. <i>Transpower [292.67] requests amendments to add “development” to NFL-P5 and to make clear that NFLP5 does not apply to the National Grid and adverse effects of the National Grid are managed in accordance with policy INF-P10.</i></p> <p>144. <i>In my opinion, NFL-P5 should be deleted, with reliance instead placed on the Infrastructure chapter, which already provides the policy direction for addressing infrastructure and its effects on ONL, ONF and other overlays.</i></p> <p>145. <i>The Coastal Environment chapter contains an equivalent policy (CE-P5), and the Infrastructure chapter— particularly INF-P5—also provides direction on managing the effects of regionally significant infrastructure on ‘overlays’, including ONL and ONF. Following discussions with the s42A authors for the Coastal Environment and Infrastructure chapters, we agree</i></p>	<p>At this stage Transpower accepts the recommendation, on the basis that the policy directive is addressed in the Infrastructure Chapter.</p> <p>However, Transpower notes that there are still</p>

		<p>voided, remedied or mitigated in accordance with NFL-P3 and NFL-P4. <u>Note: For the avoidance of doubt, adverse effects from the National Grid are managed in accordance with Policies INF-P10 in the Infrastructure chapter.</u> OR AMEND NFL-P5 (and make any consequential amendments to NFL-P2, P3, and P4) to appropriately recognise the National Grid and give effect to the National Policy Statement on Electricity Transmission.</p> <p>Reasoning: To provide clarity regarding the application of these policies. As currently drafted, there is no reconciliation with the National Grid specific policy INF-P10 or any other policies in the Infrastructure chapter</p>	<p><i>that NFL-P5 and CE-P5 should be deleted, with all policy direction relating to infrastructure (including regionally significant infrastructure and the National Grid) and its effects on ‘overlays’ should be consolidated in the Infrastructure chapter. The Infrastructure Chapter will need to be amended to give effect to, the new and amended direction in the NPS-I and NPSEN discussed above, including the direction for the NPS-I to be read alongside district plan provisions managing section 6 matters (including ONF and ONL) where relevant. This approach removes unnecessary duplication and avoids the risk of conflicting policy signals (as INF-P5 as notified is inconsistent with both NFL-P5 and CE-P5).</i></p> <p><i>146. I note that Northpower, Transpower and Forest and Bird have all made submissions on the Infrastructure chapter and specifically on INF-P5. Although no submitter specifically sought the deletion of NFL-P5, in my view it can appropriately be removed as a Clause 16 correction, as the Infrastructure chapter already addresses all matters covered by NFL-P5, its deletion removes unnecessary duplication, and it does not alter policy outcomes.</i></p> <p>Recommended:</p> <p><i>NFL-P5 Regionally significant infrastructure Enable the operation, maintenance and upgrading of regionally significant infrastructure in Outstanding Natural Features or Outstanding Natural Landscapes where: 1. There is an operational need or functional need to be in that particular location; and 2. Adverse effects on the characteristics, qualities and values of Outstanding Natural Features and Outstanding Natural Landscapes are avoided, remedied or mitigated in accordance with NFL-P3 and NFL-P4.</i></p>	<p>specific rules for RSI within this chapter. The plan needs to ensure there is an accompanying policy directive for the rules. And as such, the plan needs to clearly signpost to the infrastructure chapter.</p>
292.68	NFL-R2	<p>Relief Sought: PROVIDE clarification of the rule framework and activity cascade within NFL-R2 to appropriately provide for indigenous vegetation clearance and earthworks associated with the operation, maintenance and upgrading of regionally significant infrastructure as a permitted activity and ensure that the most restrictive activity status for those activities within Outstanding Natural Landscapes and Outstanding Natural Features in the coastal environment is discretionary.</p> <p>AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: As drafted the rules impose (under clause 5) a non-complying activity status for regionally significant infrastructure. This activity status is unclear as there are no standards which trigger a non-complying activity status, and it is not clear why regionally significant infrastructure warrants this activity status.</p> <p>There is no reconciliation with the National Grid specific policy INF-P10, or the National Policy Statement on Electricity Transmission. Specific to NFL-R3, indigenous vegetation clearance is a permitted activity under 1.b.ii. where it is associated for infrastructure. There are no standards and therefore the permitted activity status is supported. However, clause 4. then provides for regionally significant infrastructure as a permitted activity with no standards, but clause 5.</p>	<p>Accept in part. <i>As discussed in the “General – regionally significant infrastructure” section above, I have concerns about applying a blanket permitted activity status to regionally significant infrastructure (RSI) of any scale. In summary, my recommendation is to permit additions, alterations, and minor upgrading of RSI in ONL and ONF (via NFL-R1 and NFL-R5). Beyond this, in my view, no further RSI buildings or structures should be permitted other than those already enabled through the general NFL-R2 provisions.</i></p> <p><i>I addressed this above in “General – regionally significant infrastructure” section above. In summary, I support the request.</i></p> <p><i>7. Activity status when compliance not achieved with NFLR2.64: Non-Complying 3. Activity status when compliance not achieved with NFL-R2.5: Discretionary Where: a. The building or structure is associated with regionally significant infrastructure</i></p>	<p>Transpower supports Discretionary activity status.</p>

		then provides a non-complying activity status where the non-existent standards in clause 4, are not met. This causes confusion for the plan user.		
292.83	NFL-R3	<p>Relief Sought: PROVIDE clarification of the rule framework and activity cascade within NFL-R3 to appropriately provide for indigenous vegetation clearance and earthworks associated with the operation, maintenance and upgrading of regionally significant infrastructure as a permitted activity and ensure that the most restrictive activity status for those activities within Outstanding Natural Landscapes and Outstanding Natural Features in the coastal environment is discretionary. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: As above for 282.68</p>	<p>Accept in part</p> <p>246. Transpower [292.83] requests that indigenous vegetation clearance associated with the operation, maintenance and upgrading of regionally significant infrastructure is a permitted activity and the most restrictive activity status for those activities within ONL and ONF in the coastal environment is discretionary</p> <p>247. I have addressed this request under "General – regionally significant infrastructure" above. I anticipate my recommended changes will provide the relief sought.</p> <p>5. Activity status when compliance not achieved with NFLR3.4: Non-Complying 4. Activity status when compliance not achieved with NFLR3.2: Discretionary Where: The clearance is associated with regionally significant infrastructure</p>	Transpower supports a Discretionary activity status.
292.84	NFL-R4	<p>Relief Sought: PROVIDE clarification of the rule framework and activity cascade within NFL-R4 to appropriately provide for indigenous vegetation clearance and earthworks associated with the operation, maintenance and upgrading of regionally significant infrastructure as a permitted activity and ensure that the most restrictive activity status for those activities within Outstanding Natural Landscapes and Outstanding Natural Features in the coastal environment is discretionary. AND Alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.</p> <p>Reasoning: As above for 282.68</p>	<p>Accept in part.</p> <p>Same as above.</p> <p>5. Activity status when compliance not achieved with NFLR4.4: Non-Complying 4. Activity status when compliance not achieved with NFLR4.3: Discretionary Where: a. The earthworks is associated with regionally significant infrastructure</p>	Transpower supports a Discretionary activity status.