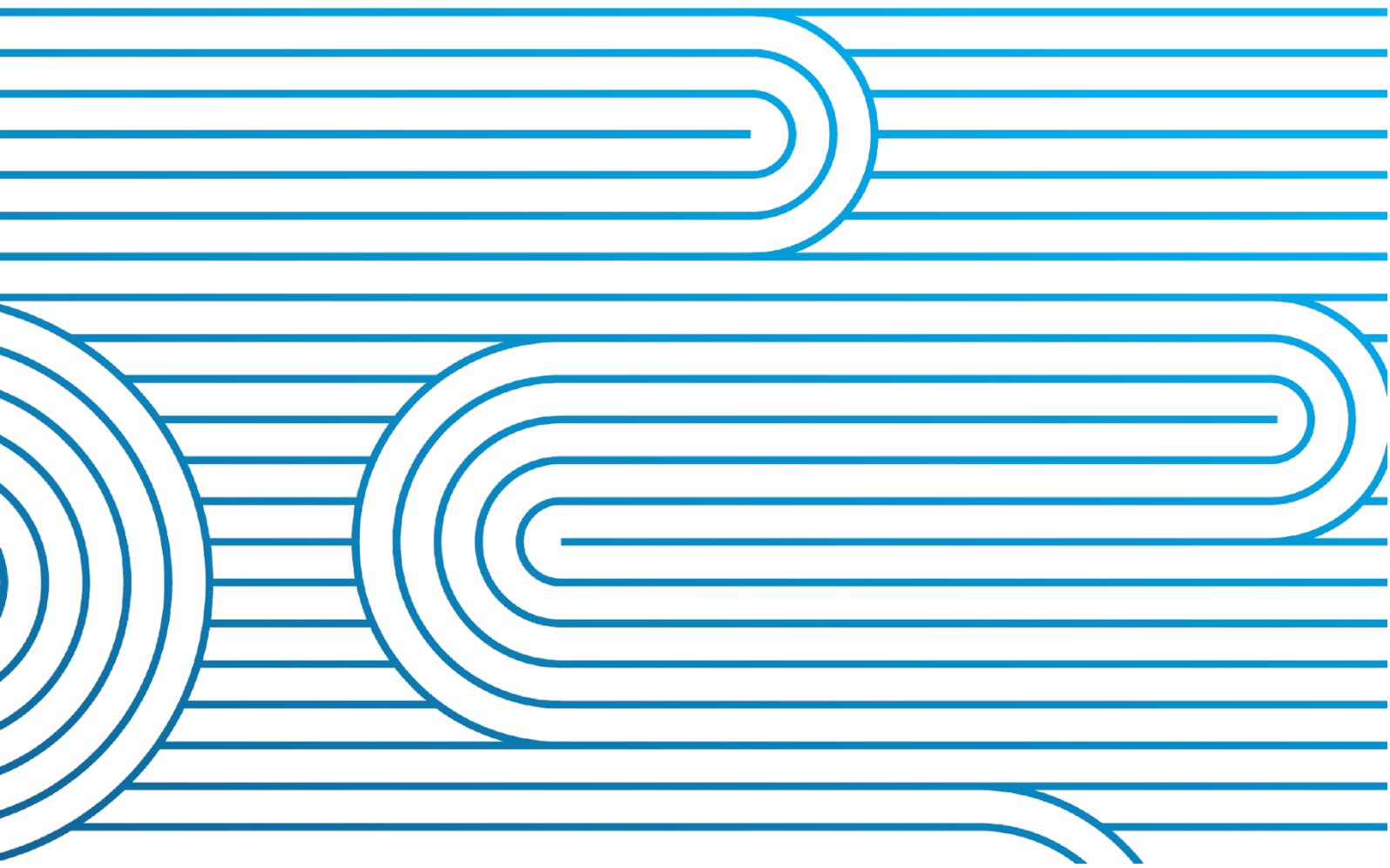


Further Submission by Transpower New Zealand Limited Kaipara District Plan

12 December 2025





Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation

Clause 8 of Schedule 1, Resource Management Act 1991

To Kaipara District Council (“the Council”)

Name of person making further submission: Transpower New Zealand Limited (“Transpower”)

This is a further submission in respect of submissions on Kaipara District Plan (“District Plan”)

Transpower has an interest in the Kaipara District Plan that is greater than the interest the general public has, for reasons including the following:

- Transpower is the owner and operator of the National Grid and the National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 (“NPSET”), the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”) and the Regional Policy Statement for Northland. The Proposed Plan Change must give effect to the NPSET and RPS, and must not duplicate or conflict with the regulations in the NESETA. Transpower has an interest in ensuring that the Kaipara District Plan meets these statutory obligations.
- Transpower has an interest as a landowner and/or occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.
- Transpower made an original submission on matters raised or affected by other submissions.

Transpower’s further submission and decision sought

Transpower’s further submission supplements, and should be read in conjunction with, Transpower’s primary submission. Transpower’s primary submission includes a description of National Grid assets and the role of the National Grid, along with a summary of the statutory framework that applies to the National Grid.

Transpower’s further submission relates to the consequences of the relief sought in submissions in respect of the Kaipara District Plan meeting its statutory obligation to give effect to the NPSET. Transpower’s position in respect of particular submissions, including the reason for Transpower’s further submission and the further relief sought are detailed in the table attached as Appendix A.

Transpower wishes to be heard in support of its further submission.

Due to the specific interests of Transpower, and particularly the national significance of the National Grid, Transpower will not consider presenting a joint case.

Daniel Hamilton – Strategic Lead – Environmental Policy

Signature of person authorised to sign on behalf of Transpower New Zealand Limited

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**Appendix A – Transpower New
Zealand Limited Further submission
on submissions made on the
Proposed Kaipara District Plan**



The following table sets out the decisions sought by Transpower in respect of submissions made on the Kaipara District Plan including the reasons for Transpower's support or opposition in respect of the original submission. The plan change text is shown as black underlined and ~~strikethrough~~.

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
FS100.1 Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ 26.25	Natural Hazards New Policy	Amend	ADD a new policy to the Natural Hazards chapter as follows (or wording of like effect): <u>INF-PX</u> <u>Enable network utilities in natural hazard overlays that:</u> <u>1. Do not increase the risk from the natural hazard to people, other property or other infrastructure;</u> <u>2. Have a functional need or operational need to be located within the area subject to the hazard; and</u> <u>3. Where necessary and appropriate include design measures to reduce the potential for damage in a natural hazard event.</u> AND Any alternative relief and/or consequential amendments.	Support	Transpower supports the policy recognition for natural hazards.	Accept the submission point.
FS100.2 Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ 26.66	Natural Features and Landscapes NFL-P4.2.c	Oppose	ADD the following clause to NFL-P4.2.c. as follows: <u>v. For new Regionally Significant Infrastructure, the constraints on form and location due to operational need or functional need.</u> AND Any alternative relief and/or consequential amendments. Submitter reasons: Notified policy is generally consistent with Policy 4.6.1 of the Regional Policy Statement in regard to managing effects on the characteristics and qualities of natural features and landscapes. However, Policy 5.3.3(1) includes a framework for new Regionally Significant Infrastructure which includes recognition of the constraints that limit the design and location of the activity. This element is not reflected in Policy NFL-P4.  Regionally Significant Infrastructure may need to be located in these environments due to functional need or operational need.	Support	Transpower supports the intent of the submission to enable the provision of Regionally Significant Infrastructure in areas of significance where there are operational or functional needs that require it.	Accept the submission point.
FS100.3 Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ 26.68	Natural Features and Landscapes NFL-R2.1	Oppose	ADD a new clause to NFL-R2.1 for permitted buildings and structures (subject to standards NFL-S1, S2 and S3) as follows: <u>iii. Regionally Significant Infrastructure</u> AND Any alternative relief and/or consequential amendments. Submitter reasons: Under clause 1 there is no permitted activity allowance for Regionally Significant Infrastructure in ONFs and ONLs. A permitted activity allowance in accordance with the standards in NFL-S1, s2 and s3 is sought, which is consistent with avoiding significant adverse effects from new structures outside of the Coastal Environment in NFL-P2. A new standard to provide an allowance for antennas on existing buildings and poles and attached antenna sin road reserves is also sought under separate submission point to provide some practical provision for telecommunications in ONL/ONF areas outside the coastal environment. Existing roads traversing ONL/ONF areas and where there are existing buildings, the values attributed to these areas in those locations have already been modified.	Support	Transpower supports the intent of the submission to enable the provision of Regionally Significant Infrastructure, in so far as the relief is consistent with that sought in Transpower's submission.	Accept the submission point in part.

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
FSS100.4 Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ 26.70	Natural Features and Landscapes NFL-R2.6 – NFL-R2.7	Oppose	AMEND NFL-R2.6 by adding in standards to be complied with NFL-S1, S2 and S3. AND AMEND NFL-R2.7 as necessary to allow the correct cross-reference in regard to when noncomplying activity status applies. AND Any alternative relief and/or consequential amendments. Submitter reasons: Under clause 6, Regionally Significant Infrastructure is a permitted activity in the Coastal Environment, without standards. Standards NFLS1, S2 and S3 should be applied to provide a permitted envelope. Clause 7 appears to have a cross-referencing error as it attributes non-complying activity status where NFL-R2.4 is not met. That cross-referred standard relates to matters of discretion for structures and buildings outside the coastal environment.	Support	Transpower supports the intent of the submission to enable the provision of Regionally Significant Infrastructure.	Accept the submission point.
FS100.5 Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ 26.71	Natural Features and Landscapes NFL-R4.4	Oppose	AMEND NFL-R4.4 by adding in a permitted earthworks allowance for Regionally Significant Infrastructure in the Coastal Environment of 20m3. AND Any alternative relief and/or consequential amendments. Submitter reasons: A small, permitted activity allowance is considered to be appropriate that would not materially adversely affect the values and qualities of ONLs and ONFs.	Support	Transpower supports the intent of the submission to enable the provision of Regionally Significant Infrastructure.	Accept the submission point.
FS100.6 Chorus New Zealand Ltd, Connexa Ltd, Spark NZ Trading Ltd, Fortysouth Group LP and One NZ 26.72	Natural Features and Landscapes NFL-R3.1	Oppose	ADD the following clause to NFL-R3.1 as follows: <u>c. The indigenous vegetation clearance is associated with Regionally Significant Infrastructure including access.</u> AND AMEND NFL-R3.4 by adding in standard NFL-S5 to be complied with. AND Any alternative relief and/or consequential amendments. Submitter reasons: Clause 1 of this rule allows for indigenous vegetation clearance outside the coastal environment (subject to meeting Standard NFLS5) for a list of activities that does not include clearance for Regionally Significant Infrastructure (only clearance around existing infrastructure). Clause 4 of this rule for indigenous vegetation clearance inside the coastal environment for Regionally Significant Infrastructure, but with no standards. Standard NFL-S5 should apply.	Support	Transpower supports the intent of the submission to enable the provision of Regionally Significant Infrastructure.	Accept the submission point.
FS100.7 FS100.8 Federated Farmers of New Zealand (Inc) – Northland Province 136.1 136.190	General	Support	AMEND the Proposed District Plan (Proposed District Plan) to provide for the installation and maintenance of farm infrastructure and assets in a consistent manner by recognising and providing for the following farm activities across the Proposed District Plan: 1. Water supply systems for domestic purposes, stock water or irrigation; 2. Drainage systems; 3. Farm tracks; 4. Fences; 5. Dams or ponds;	Support	Transpower supports the intent of the submission to enable the provision of farm infrastructure in so far as the relief is consistent with the relief sought in the Transpower submission. Transpower would have concerns should the submission point amend plan provisions that would	Accept the submission point in part.

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
			<p>6. Yards and hardstand areas; 7. Animal effluent management systems; 8. Pits for silage, offal, or other waste; 9. Farm buildings; 10. Firebreaks.</p> <p>AND Any consequential amendments.</p>		compromise the rules relating to the National Grid Yard.	
<p>Federated Farmers of New Zealand (Inc) – Northland Province</p> <p>FS100.9 FS100.10</p> <p>136.2 136.128</p>	Earthworks	Amend	<p>AMEND the Proposed District Plan to:</p> <p>a. Relocate all earthworks, land disturbance and cultivation provisions into the Earthworks chapter. This includes but is not limited to the following provisions:</p> <ul style="list-style-type: none"> • SASM-R3 and SASM-R4; • NATC-P2, NATC-R3 and NATC-S2; • ECO-R1 and ECO-R2; • NFL-R4, NFL-R7, NFL-R8, and NFL-S4; and • CE-R4 and CE-S4. <p>b. The inclusion of cross-reference within the Earthworks chapter, to earthworks provisions located in the Infrastructure and Transport chapters.</p> <p>AND Any consequential amendments.</p> <p>Submitter reasons: Definitions are provided for earthworks, land disturbance and cultivation. It appears that earthworks provisions are primarily contained in the Earthworks chapter but are also spread throughout the Proposed District Plan. In addition to earthworks, there are provisions for land disturbance (SASM-R3, ECO- R1, ECO-R2 and EW-R2) in other chapters and cultivation (SASM-R3). Only one of these land disturbance rules is located in the Earthworks chapter. The National Planning Standards gives mandatory direction for the layout of District Plans. Section 7, clause 29 states that provisions for managing earthworks must be located in the Earthworks chapter. The definitions for earthworks and land disturbance in the Proposed District Plan imply that land disturbance is a subset of earthworks, but not earthworks as such, then the submitter believes that the provisions related to land disturbance should be located in the Earthworks chapter.</p>	Oppose	<p>While Transpower understands the intent of the relief sought and that the proposed amendments may improve the clarity and readability of the Proposed District Plan, Transpower has some reservations about the location of the National Grid Yard earthworks rule INF-R49. It is noted the submission point is silent on INF-R49 (although reference is made in another submission point). Transpower's preference is that Rule INF-R49 remain within the Infrastructure Chapter. However, it is open to the relocation of the rule subject to appropriate policy recognition and supporting text within the plan that provides clear linkages to any related earthwork rules.</p>	Reject the submission point in part.
<p>Federated Farmers of New Zealand (Inc) – Northland Province</p> <p>FS100.11</p> <p>136.5</p>	Definitions	Support	<p>ADD a new nested definition that shows the relationship between the definitions for earthworks, land disturbance, cultivation and installation of fence posts.</p> <p>AND</p> <p>AMEND the Proposed District Plan so that all earthworks, land disturbance and cultivation provisions are relocated into the Earthworks chapter.</p> <p>AND Any consequential amendments.</p> <p>Submitter reasons: The Proposed District Plan contains definitions for earthworks, land disturbance and cultivation along with many provisions for earthworks and limited provisions for land disturbance (INF-R49, SASM-R3, ECO-R1, ECO-R2, EW-R2) and cultivation (SASM-R3). Only one of these rules is located in the Earthworks chapter.</p>	Support in part	<p>Transpower is supportive in principle of the relief sought in the submission point and considers the proposed amendments will potentially improve the clarity and readability of the Proposed District Plan. However, Transpower does have reservations as to any impact on INF-R47 and the exact form any nesting table will take.</p>	Accept the submission point in part.

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought	
			<p>The National Planning Standards gives mandatory direction for the layout of District Plans in that provisions for managing earthworks must be located in the Earthworks chapter.</p> <p>If land disturbance is considered by the Council to be a subset of earthworks, but not earthworks, then it would make sense if these provisions were located in the Earthworks chapter (excluding INFR49).</p> <p>As the definitions are potentially confusing and circular, the submitter submits it would be helpful to provide a nesting table that explains the relationship between each of these terms. It is acknowledged that the Council is required to use the definitions provided by the National Planning Standards.</p>				
FS100.12	Horticulture New Zealand 140.45	Infrastructure	Amend	<p>ADD the following clause to INF-P10: <u>x. In rural areas, avoiding, remedying or mitigating effects on existing land use or the ability to use highly productive land.</u></p> <p>AND Any consequential or alternative amendments required to address the concerns raised by the submitter.</p> <p>Submitter reasons: As drafted, INF-P10 only considers effects on land use in urban areas, though there may be significant impacts on the ability to use rural land productively.</p>	Oppose	<p>The proposed amendment is unnecessary as the potential effects that the submitter is concerned about are addressed by the existing subclause 4 which states:</p> <p>4. Avoiding, remedying or mitigated other adverse effects to the extent practicable;</p>	Reject the submission point.
FS100.13	Royal Forest and Bird Protection Society of New Zealand Incorporated 149.1	Purpose	Amend	<p>AMEND the Purpose chapter to include the following:</p> <p>A description of the Kaipara District's natural values, including biodiversity, landscape, freshwater and coastal environments; and</p> <p>Clear expression of the Proposed District Plan role in enabling appropriate use and development, protecting and maintaining natural environment values through managing subdivision, use and development.</p> <p>AND Any consequential amendments and alternative relief to address the concerns raised.</p> <p>Submitter reasons: The submitter opposes the Purpose chapter of the Proposed District Plan in part. It is acknowledged that the Kaipara District is growing and, as such, Council seeks to produce a simple and enabling Proposed District Plan. The proposed introductory sections emphasise enabling growth and development, as well as the use of natural and physical resources. Though these are important elements for wellbeing within Kaipara, it is requested that these sections are amended to reflect the District's natural values, including its landscapes indigenous biodiversity, freshwater and coastal ecosystems, and other taonga. All of these elements shape Kaipara's identity.</p> <p>A district plan should promote the sustainable management of natural and physical resources which involves enabling land use and development while safeguarding the lifesupporting capacity of natural resources and managing environmental effects by avoidance, mitigation or remedy. The submitter considers that the Proposed District Plan's introductory sections should align with the purpose of the Resource Management Act and national direction instruments, including the National Policy Statement for Freshwater Management, New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity. The recognition of natural values and requiring early protection will enable a more bala</p>	Oppose	<p>The submitter seeks an extensive range of unspecified amendments to the Purpose chapter of the Proposed District Plan. Transpower is therefore unable to determine the effect of the proposed changes, if any. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.</p>	Reject the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.
	Royal Forest and Bird Protection Society of New Zealand Incorporated	Vision for Kaipara	Amend	<p>ADD additional objectives to the Strategic Direction - Vision for Kaipara chapter to include recognition of the Kaipara District's natural environment, biodiversity, landscapes, waterways, waterbodies and coastal ecosystems. These objectives should recognise the importance of protecting and enhancing natural values and the role of nature-based solutions for enabling appropriate development.</p>	Oppose	<p>The submitter seeks an extensive range of unspecified amendments to the Strategic Direction chapter of the Proposed District Plan. Transpower is</p>	Reject the submission point in so far as the relief is inconsistent with the relief sought in the

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
FS100.14 149.4			<p>AND Any consequential amendments and alternative relief to address the concerns raised.</p> <p>Submitter reasons: The submitter notes that the Vision for Kaipara Objectives are focused on enabling growth and development of housing and infrastructure. It is acknowledged that these are important elements of Kaipara's future; however, there is no mention of the natural environment, nor its protection and enhancement. Though environmental matters are addressed further on in the Strategic Direction section of the Proposed District Plan, as this section is entitled 'Vision for Kaipara', it should envision the natural environment as a key component of Kaipara District's present and future identity. The submitter opposes the omission of environmental objectives from the overarching 'Vision for Kaipara' and considers this sends an unbalanced message on what the Proposed District Plan is prioritising.</p>		therefore unable to determine the effect of the proposed changes, if any. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Transpower submission.
FS100.15 Royal Forest and Bird Protection Society of New Zealand Incorporated 149.27	Infrastructure INF-P5	Amend	<p>AMEND INF-P5 so it clearly states that infrastructure will only be enabled in sensitive areas where values are protected and the activity does not result in inappropriate subdivision, use, or development.</p> <p>AND Any consequential amendments and alternative relief to address the concerns raised</p> <p>Submitter reasons: The submitter opposes INF-P5 as proposed and considers that it enables regionally significant infrastructure in sensitive environments without meeting Section 6 Resource Management Act protection requirements. Such an enabling policy risks undermining protection requirements, resulting in potential significant adverse effects on natural character, landscape values, and indigenous biodiversity. It is requested that INF-P5 is tempered so as to ensure infrastructure is only enabled where appropriate and to achieve consistency with protective direction in s6 and the New Zealand Coastal Policy Statement and National Policy Statement for Indigenous Biodiversity.</p>	Oppose	Transpower considers that the concerns that the amendments sought to INF-P5 by the submitter are seeking to resolve are appropriately addressed in subsequent policies of the Infrastructure chapter and the proposed amendments are not necessary. The amendments would also not give effect to the NPSET.	Reject the submission point.
FS100.16 Royal Forest and Bird Protection Society of New Zealand Incorporated 149.32	Infrastructure Rules	Amend	<p>AMEND the Infrastructure rules, including rule standards and matters of discretion, to expressly recognise and manage the potential adverse effects of infrastructure on natural character, indigenous biodiversity, and other identified values.</p> <p>AND Any consequential amendments and alternative relief to address the concerns raised.</p> <p>Submitter reasons: The submitter opposes Infrastructure rules in part and notes that all infrastructure activities can have adverse effects on natural character, indigenous biodiversity, environmental and cultural values. As proposed, the submitter does not consider Infrastructure rules fully recognise or respond to potential effects. Without amendment, this may lead to adverse effects not being appropriately avoided, remedied, or mitigated.</p>	Oppose	The submitter seeks an extensive range of unspecified amendments to the Infrastructure rules of the Proposed District Plan. Transpower is therefore unable to determine the effect of the proposed changes, if any. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Reject the submission in so far as the relief is inconsistent with the relief sought in the Transpower submission.
FS100.17 to FS100.26 Royal Forest and Bird Protection Society of New Zealand Incorporated 149.77- 149.86	Coastal Environment All provisions	Amend	Amendments to Overview, CE-O1, CE-O3, CE-P1, CE-R2, CE-R3, CE-R4, CE-S4, New objectives and policies, and a new standard	Oppose	Transpower opposes the proposed amendments and seeks to ensure that any changes made to the Coastal Environment chapter of the Proposed District Plan give effect to the NPSET.	Reject the submission point.
Royal Forest and Bird Protection Society of	Open Space Zone	Amend	AMEND OSZ-P5 as follows:	Oppose	While Transpower actively seeks to avoid locating new structures in Open Space Zones, there may be some	Reject the submission point in part.

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FS100.27 New Zealand Incorporated 149.124			Avoid Minimise land uses and activities that would compromise public use and enjoyment, <u>access to and the natural, ecological, cultural and heritage values associated with and access to</u> the Open space zone. AND Any consequential amendments and alternative relief to address the concerns raised. Submitter reasons: The submitter considers that, given the purpose, characteristics and values of the Open space zone, incompatible activities should be avoided rather than minimised. The activities capable of compromising Open space zone values (as set out in OSZ-O1) should also be avoided.		occasions when it is not possible to do so, due to the operational or functional requirements of the National Grid. For this reason, Transpower prefers the retention of the word minimise.	
FS100.28 to FS100.53 Royal Forest and Bird Protection Society of New Zealand Incorporated 149.127-149-153	Various	Amend	These submission points appear to be repetition of earlier submission points made by the submitter.	Oppose	Transpower opposes the submission points in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Reject the submission in so far as the relief is inconsistent with the relief sought in the Transpower submission.
FS100.54 Environmental Defence Society Incorporated 265.1	General	Amend	AMEND the Proposed District Plan to give effect to national direction and regional planning instruments in a way that is specific to Kaipara. AND Any similar, consequential or alternative relief as is necessary to address the issues raised. Submitter reasons: The submitter opposes the Proposed District Plan in part and considers that the plan requires significant re-drafting to ensure it gives effect to relevant National Policy Statements, National Environmental Standards and National planning Standards, as stated in s75 Resource Management Act: All associated Proposed District Plan objectives, policies, rules and standards need to be worded in way that achieves and gives effects to national direction in a Kaipara-specific way.	Oppose	The submitter seeks extensive unspecified amendments to the Proposed District Plan. It is therefore not possible to determine the effect of the proposed changes on the National Grid or the implementation of the NPSET. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Reject the submission in so far as the relief is inconsistent with the relief sought in the Transpower submission.
FS100.55 Environmental Defence Society Incorporated 265.2	Strategic Direction	Oppose	AMEND the Strategic Direction chapter so interrelationships between the Vision for Kaipara and other sections are clearly identified, the objectives and policies work together to achieve the overall vision for the Kaipara District and environmental values are recognised. AND AMEND the Strategic Direction by making Financial Contributions a separate chapter, i.e., not part of the 'Vision'. AND Any similar, consequential or alternative relief as is necessary to address the issues raised. Submitter reasons: Extensive, see submission.	Oppose	The submitter seeks extensive unspecified amendments to the Strategic Direction chapter of the Proposed District Plan. It is therefore not possible to determine the effect of the proposed changes on the National Grid or the implementation of the NPSET. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Reject the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.
FS100.56 Environmental Defence Society Incorporated 265.3	Ecosystems and Indigenous Biodiversity	Amend	AMEND the Ecosystems and Indigenous Biodiversity chapter to give effect to national direction and regional planning instruments. AND	Oppose	The submitter seeks extensive unspecified amendments to the Ecosystems and Indigenous Biodiversity chapter of the Proposed	Reject the submission point in so far as the relief is inconsistent with the

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought	
			<p>RETAIN the integrity of natural environment mapping Outstanding Natural Landscape, Outstanding Natural Feature, High Natural Character Area and Outstanding Natural Character Area (inferred).</p> <p>AND</p> <p>AMEND relevant objectives, policies, rules and standards to ensure planning outcomes are achieved which will not jeopardise the integrity of Kaipara's natural environment. AND Any similar, consequential or alternative relief as is necessary to address the issues raised.</p> <p>Submitter reasons: Extensive, see submission.</p>		District Plan. It is therefore not possible to determine the effect of the proposed changes on the National Grid or the implementation of the NPSET. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	relief sought in the Transpower submission	
FS100.57	Environmental Defence Society Incorporated 265.4	Natural Character	Amend	<p>AMEND the Natural Character chapter to give effect to national direction and regional planning instruments.</p> <p>AND</p> <p>RETAIN the integrity of natural environment mapping (inferred).</p> <p>AND</p> <p>AMEND relevant objectives, policies, rules and standards to ensure planning outcomes are achieved which will not jeopardise the integrity of Kaipara's natural environment.</p> <p>AND Any similar, consequential or alternative relief as is necessary to address the issues raised.</p> <p>Submitter reasons: Extensive, see submission.</p>	Oppose	The submitter seeks extensive unspecified amendments to the Natural Character chapter of the Proposed District Plan. It is therefore not possible to determine the effect of the proposed changes on the National Grid or the implementation of the NPSET. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Reject the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.
FS100.58	Environmental Defence Society Incorporated 265.5	Natural Features and Landscapes	Amend	<p>AMEND the Natural Features and Landscapes chapter to give effect to national direction and regional planning instruments.</p> <p>AND</p> <p>RETAIN the integrity of natural environment mapping (inferred).</p> <p>AND</p> <p>AMEND relevant objectives, policies, rules and standards to ensure planning outcomes are achieved which will not jeopardise the integrity of Kaipara's natural environment.</p> <p>AND Any similar, consequential or alternative relief as is necessary to address the issues raised.</p> <p>Submitter reasons: Extensive, see submission.</p>	Oppose	The submitter seeks extensive unspecified amendments to the Natural Features and Landscapes chapter of the Proposed District Plan. It is therefore not possible to determine the effect of the proposed changes on the National Grid or the implementation of the NPSET. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.	Reject the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.
	Environmental Defence Society Incorporated	Coastal Environment	Amend	<p>AMEND the entire Coastal Environment chapter to give effect to national direction.</p>	Oppose	The submitter seeks extensive unspecified amendments to the	Reject the submission point in

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
FS100.59 265.7			<p>AND Any similar, consequential or alternative relief as is necessary to address the issues raised.</p> <p>Submitter reasons: The submitter opposes the Coastal Environment chapter in part. chapter 7, paragraph 28 of the National Policy Statement requires that cross-referencing to other specific coastal provisions within other chapters is provided. Though the Natural Features and Landscapes chapter is referred to, other chapters such as Ecosystems and Indigenous Biodiversity are not referred to, even though ECO-P1 refers to biodiversity within the Coastal Environment. The submitter requests that the chapter is reviewed in line with the National Policy Statement and s75 Resource Management Act requirements.</p>		<p>Coastal Environment chapters of the Proposed District Plan. It is therefore not possible to determine the effect of the proposed changes on the National Grid or the implementation of the NPSET. Transpower opposes the submission point in so far as the relief is inconsistent with the relief sought in the Transpower submission.</p>	so far as the relief is inconsistent with the relief sought in the Transpower submission.
FS100.60 Northpower Limited and Northpower Fibre Limited 283.1	Strategic Direction	Amend	<p>AMEND the Strategic Direction chapter to include policies to support the objectives providing clear direction for the consideration of resource consents where there is conflict between different areas of strategic direction.</p> <p>AND Any further necessary consequential amendments required.</p> <p>Submitter reasons: To provide clear direction for the consideration of resource consents where there is conflict between different areas of strategic direction. To provide policies in support of the objectives.</p>	Support in part	<p>Transpower supports the submission point in principle in that it considers this would improve the clarity of the plan, particularly where there are objectives and policies that conflict. The District Plan is the appropriate planning document in which the resolve conflicts between policies in the higher order statutory documents prepared under the RMA, if this hasn't already occurred in the Regional Policy Statements. However, Transpower does note that no specific wording has been provided and on this basis, notes its support is conditional on the specific wording.</p>	Accept the submission point in part.
FS100.61 to FS100.74 Northpower Limited and Northpower Fibre Limited 283.129 283.130 283.134 283.135 283.136 283.139 283.140 283.141 283.142 283.143 283.144 283.146 283.147 283.148 283.149	Historic Heritage Notable Trees Sites and Areas of Significance to Māori Ecosystems and Indigenous Biodiversity Natural Character Natural Features and Landscapes Subdivision Coastal Environment	Amend	<p>These submission points seek a range of amendments to the provisions in the identified chapters to enabling infrastructure and/or electricity networks within overlays.</p>	Neutral	<p>Like Transpower, the submitter is seeking to ensure that infrastructure, such as the National Grid and the local electricity network are appropriately provided for in sensitive areas and reverse sensitivity effects of these assets are avoided.</p> <p>Transpower's submission seeks stand alone policies for the National Grid located in the Infrastructure Chapter with explicit recognition that these policies prevail over the provisions of the overlay chapters. The submitter is seeking explicit recognition of infrastructure in each overlay chapter.</p> <p>Transpower has some concerns that the approach taken by the submitter</p>	Reject the submission point in part.

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
FS100.75 to FS100.86			283.150 283.151 283.152 283.156 283.157 283.158 283.164 283.166 283.168 283.171 283.172 283.176		will result in Infrastructure provisions being spread throughout the plan rather than being contained within the Infrastructure Chapter to the extent practicable, which is Transpower's strong preference. Transpower seeks to ensure that plan users are not confused and/or the National Grid is not captured by plan provisions that should not be applied to it.	
FS100.87	Director General of Conservation 304.3	Definitions Amend	ADD a definition for 'Biodiversity compensation' as follows: <u>means a conservation outcome that meets the requirements in Appendix x and results from actions that are intended to compensate for any more than minor residual adverse effects on indigenous biodiversity after all appropriate avoidance, minimisation, remediation, and biodiversity offsetting measures have been sequentially applied.</u> AND ADD an appendix or schedule which sets out the principles for biodiversity compensation found in Appendix 4 of the National Policy Statement for Indigenous Biodiversity. See submission for full details of the wording for inclusion in an Appendix. AND Any further or alternative relief to like effect to that sought. Submitter reasons: Biodiversity compensation is part of the effects management hierarchy applied when activities are assessed against PDP provisions. The National Policy Statement for Indigenous Biodiversity effects management hierarchy and related provisions remain in force and need to be given effect to. The submitter considers that using the National Policy Statement for Indigenous Biodiversity definition will give effect to the Policy Statement.	Neutral	Transpower is not opposed to the inclusion of a biodiversity offsetting and compensation framework within the Proposed District Plan, however it is interested in the particular wording of the provisions to ensure such a framework is workable and appropriately gives effects to both the National Policy Statement for Indigenous Biodiversity and the NPSET.	Reject the submission point in part.
FS100.88	Director General of Conservation 304.5	Definitions Amend	ADD a definition for 'Biodiversity offset' as follows: <u>means a measurable conservation outcome that meets the requirements in Appendix X and results from actions that are intended to:</u> a. <u>redress any more than minor residual adverse effects on indigenous biodiversity after all appropriate avoidance, minimisation, and remediation measures have been sequentially applied; and</u> b. <u>achieve a net gain in type, amount, and condition of indigenous biodiversity compared to that lost.</u> AND ADD an appendix or schedule which sets out the principles for biodiversity offsetting found in Appendix 3 of the National Policy Statement for Indigenous Biodiversity. See submission for details of the wording for inclusion in a new Appendix. AND Any alternative or consequential relief.	Neutral	Transpower is not opposed to the inclusion of a biodiversity offsetting and compensation framework within the Proposed District Plan, however it is interested in the particular wording of the provisions to ensure such a framework is workable and appropriately gives effects to both the National Policy Statement for Indigenous Biodiversity and the NPSET.	Reject the submission point in part.
FS100.89	Director General of Conservation 304.71	Ecosystems and Indigenous Biodiversity New Policy	ADD a new policy to the Ecosystems and Indigenous Biodiversity chapter as follows: <u>ECO-Px Areas of Significant Indigenous Biodiversity</u>	Oppose	When considered in combination with the changes proposed to ECO-R1, this requirement is overly onerous and	Reject the submission point.

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought
			<p><u>Require activities not provided for in ECO-R1 to obtain from a suitably qualified and experienced ecologist confirming that the indigenous vegetation proposed to be cleared does not meet the criteria in Appendix 5 of the Northland Regional Policy Statement 2016 (Areas of significant indigenous vegetation and significant habitats of indigenous fauna to undertake clearance large scale clearance of indigenous vegetation.</u></p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitter reasons: The submitter requests that a new Ecosystems and Indigenous Biodiversity policy is included which outlines the specific assessment criteria of the Northland Regional Policy Statement Appendix 5 to ensure applications that do not comply with ECO-R2 are assessed consistently. Moreover, the proposed policy will support the implementation of ECO-O1.</p>		would have significant implications for existing and new National Grid assets.	
FS100.90	Director General of Conservation 304.73 Ecosystems and Indigenous Biodiversity	Oppose	<p>AMEND ECO-R1 - see submission for details of amendments sought.</p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitter reasons: Opposes ECO-R1 as it fails to recognise s6(c) of the Resource Management Act, the National Policy Statement for Indigenous Biodiversity (NPS-IB) and Policy 3.15 of the Northland Regional Policy Statement (NRPS). The submitters concerns are summarised below - refer to submission for details: Constructing a new fence should not require 3.5m of clearance either side. As drafted, the rule permits up to 7m of clearance. Creating new setbacks for buildings from indigenous vegetation should be separated from the maintenance of existing setbacks. New setbacks have potential adverse effects on indigenous vegetation by reducing area and exposing the vegetation to pests and weeds. High amounts of indigenous vegetation clearance is permitted in all zones for the purposes of establishing, constructing and completing residential development, including associated onsite infrastructure and access, thus leaving large areas of indigenous vegetation unprotected. As drafted, the rule does not manage Kauri Dieback Disease.</p>	Oppose	The changes proposed to ECO-R1 are overly onerous and are not consistent with the requirements of the NPSET.	Reject the submission point.
FS100.91	Director General of Conservation 304.78 Natural Character	Amend	<p>ADD a new objective to the Natural Character chapter as follows: <u>Land use and subdivision is consistent with and does not compromise the characteristics and qualities of the natural character of wetland, lake and river margins.</u></p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitters reasons: To ensure land use and subdivision is consistent with, and does not compromise, the natural characteristics and qualities of wetlands, lakes, rivers and their margins.</p>	Oppose	The proposed objective is unclear and Transpower does not understand how it would be achieved. NATC-O1 already addressed natural character and gives effect to Section 6 of the RMA.	Reject the submission point.
FS100.92	Director General of Conservation 304.82 Natural Character	Oppose	<p>AMEND NATC-R1 to provide more consideration to wetlands, indigenous biodiversity and fauna.</p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitter reasons:</p>	Oppose	The submission is not clear on what changes are proposed to the Rule and therefore the implications for the National Grid, Transpower opposes the point.	Reject the submission point in so far as it is inconsistent with the relief sought in the

Submitter name, number and point	Plan Provisions	Relief Sought	Relief Sought (by original submitter)	Support / Oppose	The reasons Transpower's support / opposition are	Decision sought	
			<p>As drafted, NATC-R1 does not recognise and provide for s6(a) and (c) of the Resource Management Act and needs to be amended to consider the potential damaging effect of altering buildings and structures in wetlands.</p> <p>The Kaipara district has some of Northland's most important wetlands and lakes, including the internationally significant Waikare and Taharoa Lakes. Moreover, wetlands on private land are important for managing biodiversity and may contain significant indigenous fauna and/or threatened or at-risk flora.</p>			Transpower submission.	
FS100.93	Director General of Conservation 304.83	Natural Character	Oppose	<p>AMEND NATC-R2 to include consideration for Kauri Dieback and more restrictive activity thresholds to protect areas of significant indigenous vegetation and fauna.</p> <p>AND</p> <p>ADD the areas of significant indigenous vegetation and fauna to the PDP, guided by Attachment 2 of the submission.</p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitter reasons: NATC-R2 does not recognise and provide for s6(c) of the Resource Management Act as it does not consider Kauri Dieback.</p>	Oppose	The submission is not clear on what changes are proposed to the Rule. It is therefore not clear what changes are proposed to the Rule and the implications for the National Gird.	Reject the submission point in so far as it is inconsistent with the relief sought in the Transpower submission.
FS100.94	Director General of Conservation 304.84	Natural Character	Oppose	<p>AMEND NATC-R3 to exclude provision for activities such as swimming pools, effluent disposal systems, and driveways.</p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitter reasons: The submitter opposes NATC-R3 and considers that provision for earthworks of activities that can result in adverse effects on the natural character of wetland, lakes and river margins is inappropriate.</p>	Oppose	The submission includes a non-exclusive list of items that are proposed to be excluded from the rule. It is therefore not clear what changes are proposed to the Rule and the implications for the National Gird.	Reject the submission point in so far as it is inconsistent with the relief sought in the Transpower submission.
FS100.95	Director General of Conservation 304.85	Natural Character	Oppose	<p>AMEND NATC-R4 so non-compliance with standards cascades to a discretionary activity status.</p> <p>AND</p> <p>ADD a discretionary activity requirement for a suitably qualified and experienced ecologist to identify the ecological value of vegetation in accordance with Appendix 5 of the Northland Regional Policy Statement.</p> <p>AND</p> <p>AMEND the scale of earthworks provided for by NATC-S2 (refer to submission point 304.86 in relation to applicable standard).</p> <p>AND Any further or alternative relief to like effect to that sought.</p> <p>Submitter reasons: Providing for the clearance of unidentified indigenous vegetation that can result in adverse effects on the natural character of wetland, lakes and river margins is inappropriate. As wetlands, lakes, and river margins within the Kaipara District contain areas of significant indigenous vegetation and fauna, NATC-R4 should be amended to recognise and provide for s6(c) Resource Management Act.</p>	Oppose	In combination with submission point 304.86 and 304.87, the rule framework is unclear and appears overly onerous. It is therefore not clear what changes are proposed to the Rule and the implications for the National Gird.	Reject the submission point in so far as it is inconsistent with the relief sought in the Transpower submission.

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			The submitter seeks that a maximum of 25m2 is permitted, and that an assessment against Appendix 5 of the Northland Regional Policy Statement is required to be undertaken by an ecologist.			
FS100.96 Director General of Conservation 304.86	Natural Character	Oppose	AMEND NATC-S2 to reduce the scale of earthworks within wetlands, lakes and river margins (refer to submission point 304.85 in relation to applicable rule). AND Any further or alternative relief to like effect to that sought. Submitter reasons: NATC-S2 does not recognise or provide for s6(c) of the Resource Management Act, and Kaipara District features areas of significant indigenous vegetation and fauna within its wetlands, lakes, and river margins.	Oppose	In combination with submission point 304.85 and 304.87, the rule framework is unclear and appears overly onerous. It is therefore not clear what changes are proposed to the Rule and the implications for the National Grid.	Reject the submission point in so far as it is inconsistent with the relief sought in the Transpower submission.
FS100.97 Director General of Conservation 304.87	Natural Character	Oppose	AMEND NATC-S3 by reducing the amount of vegetation clearance permitted to 25m2. AND ADD a requirement for an ecological assessment to be carried in accordance with Appendix 5 of the Northland Regional Policy Statement by a suitably qualified and experienced ecologist if the permitted threshold is exceeded. AND Any further or alternative relief to like effect to that sought. Submitter reasons: The threshold should be reduced and any clearance in excess of the threshold should require an ecological assessment.	Oppose	In combination with submission point 304.85 and 304.86, the rule framework is unclear and appears overly onerous.	Reject the submission point in so far as it is inconsistent with the relief sought in the Transpower submission.
FS100.98 Director General of Conservation 304.107	Coastal Environment	Amend	AMEND CE-O1 as follows: The Characteristics, qualified of the natural character, <u>including Outstanding Natural Character Areas, Natural Character Areas, and all other areas</u> of the coastal environment are preserved and are protected from inappropriate subdivision, use and development. AND Any further or alternative relief to like effect to that sought.	Neutral	Transpower notes that there appears to be an error in the amendment proposed by the submitter and reserves its position subject to clarification of the relief sought.	Reject the submission point.

