

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH
I MUA I TE KOOTI TAIAO O AOTEAROA**

	ENV-
UNDER	The Resource Management Act 1991 (Act)
IN THE MATTER	of an appeal under clause 14(1) of Schedule 1 of the Act
BETWEEN	TRANSPower NEW ZEALAND LIMITED
	Appellant
AND	DUNEDIN CITY COUNCIL
	Respondent

NOTICE OF APPEAL BY TRANSPower NEW ZEALAND LIMITED

DATED 19 DECEMBER 2018



Simpson Grierson

Barristers & Solicitors

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**To: The Registrar
Environment Court
Christchurch**

1. Transpower New Zealand Limited (**Transpower**) appeals against the decisions of the Dunedin City Council (**Council**) on the Proposed Second Generation Dunedin District Plan (**Proposed Plan**).
2. Transpower made a submission and further submission on the Proposed Plan.
3. Transpower is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991 (**RMA**).
4. The Hearings Panel recorded its decisions, and the reasoning, in 29 decision reports being one report per hearing topic (**Decisions**). Transpower received notice of the Decisions on 7 November 2018.

Background

5. Transpower is the State Owned Enterprise that plans, builds, maintains and operates New Zealand's high voltage transmission network (**National Grid**) that links generators to distribution companies and major industrial users. The National Grid, which extends from Kaikohe in the North Island down to Tiwai in the South Island, transports electricity throughout New Zealand.
6. Transpower's assets within or traversing the Dunedin City area form part of the National Grid and include seven high voltage transmission lines and four substations.
7. Transpower's role and function is constrained by the State Owned Enterprises Act 1986, the company's Statement of Corporate Intent, and the regulatory framework within which it operates.
8. Transpower's principal objective, as set out in section 4 of the State-Owned Enterprises Act 1986, is to operate as a successful business as profitable and efficient as comparable businesses that are not owned by

the Crown. This includes delivering and operating a safe, reliable, cost efficient transmission grid that meets New Zealand's needs now and into the future. Consequently, one of Transpower's key objectives is to maintain and develop the National Grid.

9. The National Policy Statement on Electricity Transmission (**NPSET**) was gazetted on 13 March 2008 and confirms the national significance of the National Grid. It also establishes national policy direction to recognise the benefits of transmission, the effects of the National Grid and the need to appropriately manage activities and development close to it. The objective of the NPSET is:

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

10. The NPSET policies provide for the recognition of the benefits of transmission, as well as the environmental effects of transmission, and the management of adverse effects on the transmission network.

Parts of the Decisions being appealed

11. The specific parts of the Decisions that Transpower are appealing are as follows:

- (a) Part A. Plan Overview and Strategic Directions:
 - (i) 1.5 Definitions ('National Grid Subdivision Corridor', 'National Grid Yard', and 'reverse sensitivity');
 - (ii) 2.1 Introduction;
 - (iii) Policy 2.2.2.3;
 - (iv) Objective 2.3.1 and Policy 2.3.1.7;
- (b) Part B. City-wide Activities:
 - (i) Performance standard 3.3.2(7)(ii);
 - (ii) Rule 3.5.5;

- (iii) 5.1 Introduction;
 - (iv) Policy 5.2.2.2;
 - (v) Policy 5.2.2.3;
 - (vi) Policy 5.2.2.4;
 - (vii) Rule 5.3.2 (10);
 - (viii) Rule 5.6.1.1;
 - (ix) Rule 5.6.1.2;
 - (x) Rule 5.7.1 (3);
 - (xi) Rule 5.7.4 (1);
 - (xii) Rule 5.8.5;
 - (xiii) Rule 5.10.2;
 - (xiv) Rule 5.10.4;
- (c) Part C. City-wide Provisions:
- (i) Policy 9.2.2.12;
 - (ii) Performance standard 9.3.2;
 - (iii) Performance standard 9.3.4; and
 - (iv) Performance standard 9.4.3 (6)
- (d) Part D. Management Zones:
- (i) Rule 15.5.3;
 - (ii) Rule 15.7.6;
 - (iii) Rule 16.5.3;
 - (iv) Rule 16.7.5;
 - (v) Rule 17.5.3;
 - (vi) Rule 17.7.6;
 - (vii) Rule 18.5.2;
 - (viii) Rule 18.7.5;
 - (ix) Rule 19.5.2;
 - (x) Rule 19.7.5;
 - (xi) Rule 20.7.5; and
- (e) Planning Maps.

12. Transpower is also seeking new definitions, objectives, policies, and rules be included into the Proposed Plan.

Reasons for the Appeal

13. The reasons for this appeal are that, in the absence of the relief sought, the Proposed Plan:

- (a) will not give effect to the NPSET as required by section 75(3)(a) of the Act;
- (b) will not give effect to the Otago Regional Policy Statement (**ORPS**) as required by section 75(3)(c) of the Act (which the Otago Regional Council resolved on 12 December 2018 to make operative in part, with the effective date being 14 January 2019);
- (c) do not represent the most appropriate way of exercising the Council's functions, having regard to the efficiency and effectiveness of other reasonably practicable options, and are therefore not appropriate in terms of section 32 and other provisions of the RMA;
- (d) is not consistent with the purpose and principles of the RMA under Part 2, as it:
 - (i) does not manage the use of resources in a way that enables communities to provide for their social, economic and cultural wellbeing;
 - (ii) does not enable people and communities to provide for their health and safety;
 - (iii) does not sustain the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations;
 - (iv) does not enable the effects of third party activities on the lines and structures to be appropriately managed;
 - (v) does not facilitate the efficient use and development of natural and physical resources; and
 - (vi) does not address reverse sensitivity effects and facilitate the maintenance and enhancement of amenity values and the quality of the environment.

14. Without limiting the generality of those reasons, in relation to the NPSET the Proposed Plan:

- (a) does not reflect the NPSET's approach to enabling the National Grid and managing effects of the National Grid;
- (b) does not recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission (Policy 1);
- (c) does not recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network (Policy 2);
- (d) does not consider the constraints imposed on achieving measures to avoid, remedy or mitigate effects of the National Grid by the technical and operational requirements of the network (Policy 3);
- (e) does not have regard to the extent to which any adverse effects are avoided, remedied or mitigated by the route, site and method selection when considering the environmental effects of new transmission infrastructure or major upgrades of existing infrastructure (Policy 4);
- (f) does not enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets (Policy 5);
- (g) does not require the planning and development of the National Grid in rural environments to seek to avoid (rather than 'avoid' in all circumstances) adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity, as well as existing sensitive activities (Policy 8);
- (h) does not (to the extent reasonably possible) manage activities to avoid reverse sensitivity effects on the electricity transmission network and ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised (Policy 10); and
- (i) does not identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in the Proposed Plan, and/or given consent (Policy 11); and
- (j) does not effectively identify the electricity transmission network on the relevant planning maps (Policy 12);

15. Further, the Decisions of the Council will not give effect to the ORPS, particularly its directions to (in summary):

- (a) restrict the establishment of activities that may result in reverse sensitivity effects (Policy 4.3.4(a));
- (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on the functional needs of significant infrastructure (Policy 4.3.4(b) and (c));
- (c) protect infrastructure corridors from activities that are incompatible with the anticipated effects of significant infrastructure (Policy 4.3.4(d));
- (d) identify corridors for the existing National Grid within which activities and development will be managed to the extent reasonably possible to ensure that the functional needs of the National Grid are not compromised (Policy 4.3.6(b));
- (e) not allow existing activities in the identified corridors to intensify in a way that increases their incompatibility with existing National Grid infrastructure (Policy 4.3.6(c)); and
- (f) enable the efficient transport of electricity (Policy 4.4.4).

16. Additional detailed reasons for the relief sought are set out in **Attachment 1**.

Relief

17. Transpower seeks the detailed relief as set out in **Attachment 1**. Transpower also seeks any consequential relief to those or other related provisions necessary to give effect to the detailed relief set out in **Attachment 1**.

18. Transpower **attaches** the following documents to this notice of appeal:

- (a) a copy of the amendments it seeks to 2GP (**Attachment 1**);
- (b) a copy of the relevant Decisions (**Attachment 2**); and
- (c) a copy of Transpower's submission (**Attachment 3**) and further submission (**Attachment 4**).

19. This Notice of Appeal has been served on every person who made a submission on the relevant Decisions of the Proposed Plan listed in **Attachment 2**.

DATED this 19th day of December 2018



S J Scott / C J McCallum
Counsel for Transpower New Zealand
Limited

This notice of appeal is filed by SARAH JANE SCOTT solicitor for the Appellant of the firm of Simpson Grierson.

The address for service of the Appellant is at the offices of Simpson Grierson, Level 1, 151 Cambridge Terrace, Christchurch. 8013,

Documents for service on the Appellant may be left at that address for service or may be -

- (a) posted to the solicitor at PO Box 874, Christchurch 8140; or
- (c) emailed to the solicitor at sarah.scott@simpsongrierson.com and catherine.mccallum@simpsongrierson.com.

Advice to recipients of copy of notice of appeal

How to become party to proceedings

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must,-

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

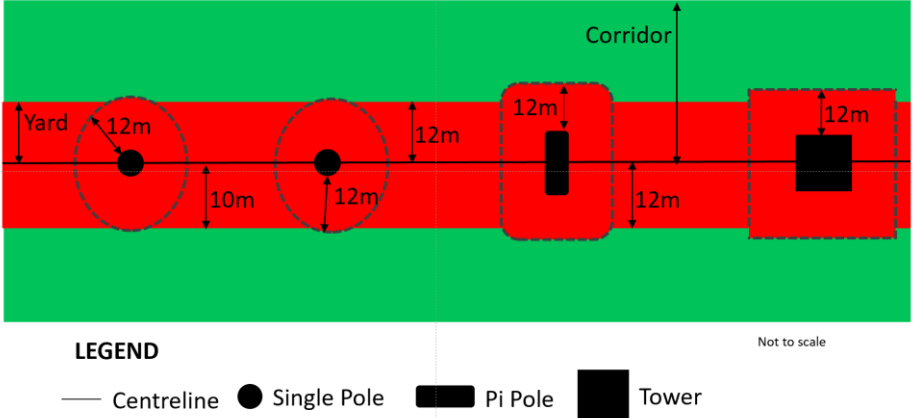
Advice

If you have any questions about this notice, contact the Environment Court in Auckland.

ATTACHMENT 1

Amendments Sought to the Proposed Plan by Transpower

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
Part A Plan Overview and Strategic Directions (1.5 Definitions)		
Add new definitions for 'National Grid Subdivision Corridor' and 'National Grid Yard'	<u>National Grid Subdivision Corridor</u> <i><u>The area measured either side of the centreline of above ground National Grid transmission lines as follows:</u></i> <i><u>a. 16 metres from the centreline of a 110kV National Grid transmission line on poles;</u></i> <i><u>b. 32 metres from the centreline of a 110kV National Grid transmission line on towers or mono-poles;</u></i> <i><u>c. 37 metres from the centreline of a 220kV National Grid transmission line on towers.</u></i> <u>National Grid Yard</u> <i><u>The area located (as illustrated in red below):</u></i> <i><u>a. 12 metres from the outside edge of a National Grid support structure foundation;</u></i> <i><u>b. 12 metres from the boundary of a National Grid substation;</u></i> <i><u>c. 12 metres from the centreline of an overhead National Grid transmission line.</u></i>	The Proposed Plan shows the 'National Grid Corridor Mapped Area' on the Plan Maps, however this does not provide for the effective operation, maintenance, upgrading and development of the transmission network as required by the NPSET. The relief sought is to insert two new definitions of 'National Grid Subdivision Corridor' and 'National Grid Yard', and associated amendments to the Planning Map, which is set out in more detail below). Transpower considers this more appropriately gives effect to the NPSET.

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
	 LEGEND — Centreline ● Single Pole ■ Pi Pole ■ Tower Not to scale	
'reverse sensitivity'	Reverse sensitivity <i>When lawful activities that create effects beyond site boundaries (such as noise, odour, traffic movements, risk or electromagnetic interference) are affected by uses establishing nearby that may have sensitivity to, and subsequently complain about these effects; and seek to limit the ability of the activities to continue. Lawful activities in the context of this definition refers to: existing lawfully established activities, permitted activities, designations and consented activities that are likely to establish. The most common example is new residential activities establishing next to farming or industrial operations, or airports, which can lead to the new residents complaining about noise, odour or other nuisance effects from those established activities.</i>	Transpower seeks to delete the reference to 'beyond site boundaries' within the definition of 'reverse sensitivity'. The words are problematic where there is no 'site' as is the case for some of Transpower's network and consequently the definition does not give effect to the NPSET, specifically Policy 10 that requires decision-makers to the extent reasonably possible to manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.
Part A Plan Overview and Strategic Directions (2. Strategic Directions)		
2.1 Introduction	2.1 Introduction <i>The strategic directions section focuses on key issues for the city and establishes the overall management approach for the Plan, including zoning and other methods used in the Plan. These strategic directions reflect the strategic directions of the Spatial Plan for</i>	While the 'strategic directions' provisions give some recognition of the need to develop and protect the National Grid, Transpower seeks the deletion of the direction in 2.1 Introduction that the 'strategic directions' provisions will be most relevant to

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	<i>Dunedin adopted in September 2012, key goals for Dunedin identified by the community in the development of the Plan, and the purpose and principles of the Resource Management Act 1991.</i> <i>There are six overall strategic directions. Each strategic direction includes objectives and policies which outline key methods. The strategic directions include the spatial distribution policies necessary to achieve strategic city-wide objectives.</i> <i>The objectives and policies in the strategic directions section will be most relevant to the assessment of resource consent applications for non-complying activities, but they may also be relevant for other resource consent applications, particularly in considering cumulative effects. Situations where they are most relevant are outlined in the assessment rules of the management and major facility zones and city-wide activities and provisions sections.</i> <i>The strategic directions, and the objectives and policies within them, are not ordered in any particular way.</i>	considering an application for resource consent for a non-complying activity. This is because such an approach may 'write down' the weight given to policies that relate to enabling and protecting the National Grid elsewhere in the Proposed Plan and so does not give effect to the NPSET or the ORPS.
Policy 2.2.2.3	<i>Policy 2.2.2.3 Enable renewable energy generation and its connection to the National Grid, in recognition of its benefits including those set out in the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement on Electricity Transmission 2008, through policies and rules that:</i> <i>a. provide for the development of appropriate scales of generation;</i> <i>b. acknowledge the practical constraints of renewable energy generation, including those arising from the need to locate where resources are available;</i> <i>c. acknowledge the benefits, in terms of the efficient use of energy, of locating renewable energy generation close to end use and to electricity transmission or distribution infrastructure; and</i> <i>d. acknowledge the benefits of having a distributed network for greater energy resilience.</i>	Transpower seeks to include direct reference to the National Grid and the NPSET in the Policy (or elsewhere in the Strategic Directions) in order to give full effect to the NPSET. In particular, Policy 1(iii) of the NPSET requires decision-makers to recognise and provide for the benefits of transmission including its role in facilitating the use and development of new electricity generation, including renewable generation.

Provision	Amendments sought				Reasons for appeal (in addition to General Reasons in Appeal above)
	Amendments to the decision version of the Proposed Plan are shown in blue .				
Objective 2.3.1 and Policy 2.3.1.7	“Objective 2.3.1: Land and facilities important for economic productivity and social well-being				Transpower seeks to add the words ‘upgrade, maintain and develop’ to Objective 2.3.1 and to include the word ‘maintenance’/ ‘maintained’ in Policy 2.3.1.7. This relief gives better effect to the NPSET, specifically the NPSET Objective to facilitate the ‘operation, <u>maintenance</u> and <u>upgrade</u> of the existing transmission network and the <u>establishment</u> of new transmission resources’.
	Land and facilities that are important for economic productivity and social well-being, which include industrial areas, major facilities, key transportation routes, network utilities; and productive rural land are:				
	a. protected from less productive competing uses or incompatible uses, including activities that may give rise to reverse sensitivity; and b. in the case of facilities, able to operate, <u>upgrade, maintain and develop</u> efficiently and effectively.				
	Policy 2.3.1.7	Enable network utilities through:			In addition, ‘rules’ should be amended to ‘provisions’ as it is not only Rules that will achieve the policy. The Proposed Plan also uses Assessment Matters, and other types of provisions. Provisions is therefore a more accurate term to use.
		a. identifying National Grid infrastructure on planning maps and protecting the safe and efficient establishment, <u>maintenance</u> , operation and upgrading of this infrastructure from inappropriate development;			
		b. <u>rules provisions</u> that enable network utilities to be established, <u>maintained</u> , operated and upgraded efficiently and effectively, while managing any adverse effects on the environment; and c. <u>rules provisions</u> that require activities that may damage or impede access to network utilities, and activities that may be sensitive to their effects, to be set back an adequate distance from network utilities.”			
Part B City-wide Activities (Part 3 Public Amenities)					
Amend 3.3.2 Activity status table - public amenities activities and 3.5 Performance Standards	Public amenities activities	Activity status			Performance standards
		a. Res	b. All other zones	c. In a heritage precinct or on a scheduled	
					The Decisions reports contain no discussion on the submission points seeking the deletion of performance standard 3.3.2(7)(ii), which state that public amenities are subject to the ‘setback from National Grid’ provisions, nor the deletion of Rule 3.5.5, which limits the setbacks from the National Grid to flag poles and play equipment. In addition, the summary of decisions

Provision	Amendments sought					Reasons for appeal (in addition to General Reasons in Appeal above)	
	Amendments to the decision version of the Proposed Plan are shown in blue .						
				heritage site		at Appendix 2 to the Network Utilities report state that the decision was not to delete these provisions. However, the retention of the provisions, unchanged, conflicts with the amended policies and Rule 5.6.1.1 as determined by the Decisions, and may confine the extent to which public amenities are regulated in the National Grid yard. The retention of the provisions therefore does not give effect to the NPSET and so Transpower seeks to delete the provisions.	
	7.	All other activities in the public amenities category	P	P	P		i. Maximum height ii. Setback from National Grid iii. Maximum dimensions"
	3.5.5 Setback from National Grid						
	Public play equipment and freestanding flagpoles must comply with Rule 5.6.1.1.						
Part B City-wide Activities (Part 5 Network Utilities)							
5.1 Introduction	5.1 Introduction <i>Activities generally managed as network utilities in this Plan include: electricity generators and other energy generators; structures associated with the investigation of energy resources; National Grid electricity transmission infrastructure and other energy distribution infrastructure; water, waste water and stormwater infrastructure; telecommunication and radiocommunication infrastructure; navigational aids; meteorological facilities; and river flow recording facilities.</i> <i>The exception to this is that “building utilities”, which are structures attached to buildings that form part of the utility systems of that building (for example, roof-top solar panels and satellite dishes), are treated as part of the building or structure to which they are attached. This means that building utilities are managed by the rules for buildings and structures in the management zone sections, and are not subject to the network utilities provisions.</i> <i>Certain types of infrastructure that are included in the definition of “network utility operation” in the Resource Management Act 1991 (section 166) are not managed as network utilities in this Plan. These include: irrigation infrastructure, which is managed via provisions for structures in the management zones sections; roads, which are managed as transportation activities in Section 6; railways, which are managed via designations; the airport and air traffic control services, which are managed via the</i>					Amendments are sought to 5.1 Introduction as the Decisions version does not give effect to the NPSET in recognising the national significance of the electricity transmission network. The Decisions version also does not mention the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA) except for in the definition of ‘operation, repair, minor upgrading and maintenance of existing network utilities’ and Note 5.3.2A. The Council must ‘observe’ NESETA (section 44A(7) of the RMA) and ensure the plan does not duplicate or conflict with the NESETA’s provisions (section 44A). Transpower seeks a complete and accurate description of the two national instruments applying specifically to the National Grid, that is, the NPSET and NESETA.	

Provision	Amendments sought	Reasons for appeal (in addition to General Reasons in Appeal above)
	Amendments to the decision version of the Proposed Plan are shown in blue. Dunedin International Airport Zone section; and the Taieri Aerodrome, which operates as a secondary airport in the event of emergency, and is managed via the Taieri Aerodrome Zone section. Network utilities support the efficient functioning of the city and contribute directly to the social, economic and cultural well-being, and the health and safety, of people living in Dunedin, including during civil defence operations. The benefits of electricity transmission and renewable electricity generation in particular have been recognised in the National Policy Statement on Electricity Transmission 2008 (NPSET) and the National Policy Statement for Renewable Electricity Generation 2011 (NPSREG). The benefits of sustainable, secure and efficient electricity transmission include: security of electricity supply; efficient transfer of energy through a reduction of transmission losses; the facilitation of the use and development of new electricity generation, including renewable generation; and enhanced supply of electricity through the removal of points of congestion. The benefits of renewable electricity generation include: maintaining or increasing generation capacity while avoiding, reducing or displacing greenhouse gas emissions; benefits to the security of electricity supply from diversification of the type and/or location of generation; using renewable natural resources rather than finite resources; the reversibility of the adverse effects on the environment of some renewable electricity generation technologies; and avoiding reliance on imported fuels for the purposes of generating electricity. While network utilities have social, economic, cultural and environmental benefits, they can also have adverse effects on landscape, natural character, biodiversity, Manawhenua and heritage values, on public health and safety, and on the amenity and character of residential and other areas. The National Grid, which is owned and operated by Transpower New Zealand Limited (Transpower), is nationally significant infrastructure. Providing for its ongoing operation, maintenance, upgrade and development will assist in maintaining and enhancing the security of energy supply to Dunedin, the Otago Region and the country. The importance of this infrastructure has been recognised in the development of the National Policy Statement on Electricity Transmission 2008 (NPSET) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA). The District Plan must give effect to the provisions of the NPSET. The NPSET requires decision-makers to recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. These benefits include: security of electricity supply; efficient transfer of energy through a	

Provision	Amendments sought	Reasons for appeal (in addition to General Reasons in Appeal above)						
	Amendments to the decision version of the Proposed Plan are shown in <u>blue</u>. <u>reduction of transmission losses; the facilitation of the use and development of new electricity generation, including renewable generation; and enhanced supply of electricity through the removal of points of congestion.</u> Land use activities, development and subdivision can also have adverse effects on the efficient operation of network utilities. In relation to the National Grid, the NPSET requires that councils, through their district plans, manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised. In response to these issues, this Plan puts in place provisions that enable the establishment, operation, maintenance upgrading of network utilities while managing the adverse environmental effects that can occur as a result of these activities. The design, location, and scale of the structures required for network utilities are managed in order to minimise adverse effects as far as practicable. The degree of restriction is determined by the sensitivity of the environment in which the particular structures are located and by the technical and operational requirements of the activity. In addition, the Plan restricts sensitive activities and other incompatible development in the vicinity of both National Grid infrastructure, and Radio New Zealand’s facilities on the Otago Peninsula, in order to manage potential adverse effects on these utilities. The controls in the Plan are intended to facilitate efficient and effective infrastructure networks in Dunedin, and provide for the increased development of electricity from renewable resources.							
5.2 Objectives and Policies	<table><tr><th colspan="2">“Objective 5.2.x</th></tr><tr><td colspan="2"><u>The national significance of the National Grid is recognised by the facilitation of the ongoing operation, maintenance, development and upgrading of the National Grid, while adverse environmental effects of the National Grid, and on the National Grid, are managed.</u></td></tr><tr><td><u>Policy 5.2.x.1</u></td><td><u>Recognise the benefits of the National Grid by:</u> <u>a. enabling the operation, maintenance and upgrade of the National Grid;</u></td></tr></table>	“Objective 5.2.x		<u>The national significance of the National Grid is recognised by the facilitation of the ongoing operation, maintenance, development and upgrading of the National Grid, while adverse environmental effects of the National Grid, and on the National Grid, are managed.</u>		<u>Policy 5.2.x.1</u>	<u>Recognise the benefits of the National Grid by:</u> <u>a. enabling the operation, maintenance and upgrade of the National Grid;</u>	The relief seeking the new objective and policy framework more appropriately gives effect to the NPSET (in particular Policies 3, 4 and 8) rather than Decisions version Objective 5.2.2 and associated policies. This is because the approach taken to enabling the National Grid activities and the management of effects in the Decisions version does not implement the policy directives in the NPSET. Further, it is not consistent with the approach to ‘encouraging renewable electricity generation’ (as new generation is reasonably likely to require a new
“Objective 5.2.x								
<u>The national significance of the National Grid is recognised by the facilitation of the ongoing operation, maintenance, development and upgrading of the National Grid, while adverse environmental effects of the National Grid, and on the National Grid, are managed.</u>								
<u>Policy 5.2.x.1</u>	<u>Recognise the benefits of the National Grid by:</u> <u>a. enabling the operation, maintenance and upgrade of the National Grid;</u>							

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
	<i>b. <u>providing for the development of the National Grid, while managing its adverse effects by:</u></i> <i>i. <u>seeking to avoid adverse effects on the values and attributes of the following:</u></i> <i>1. <u>an Outstanding Natural Coastal Character overlay zone (ONCC);</u></i> <i>2. <u>an High Natural Coastal Character overlay zone (HNCC);</u></i> <i>3. <u>an Outstanding Natural Feature overlay zone (ONF);</u></i> <i>4. <u>an Outstanding Natural Landscape overlay zone (ONL);</u></i> <i>5. <u>a Scheduled Area of Significant Biodiversity Value (ASBV);</u></i> <i>6. <u>a Significant Natural Landscape overlay zone (SNL);</u></i> <i>7. <u>a Scheduled Heritage Site (SHS);</u></i> <i>8. <u>a Heritage Precinct (HP).</u></i> <i>ii. <u>where avoiding adverse effects on the values listed in b(i) above is not practicable, remedying or mitigating the adverse effects on those values;</u></i> <i>iii. <u>avoiding remedying or mitigating other adverse effects;</u></i> <i>c. <u>when considering the adverse effects of the development of the National Grid, having regard to:</u></i> <i>i. <u>the extent to which measures to avoid, remedy or mitigate adverse effects may be constrained by functional, technical or operational needs;</u></i> <i>ii. <u>the extent to which adverse effects have been addressed through site, route or method selection;</u></i> <i>iii. <u>opportunities to reduce existing adverse effects;</u></i> <i>iv. <u>offsetting for residual adverse effects on indigenous biological diversity.</u></i>	transmission line connection), and does not give effect to Chapter 4 of the ORPS.

Provision	Amendments sought Amendments to the decision version of the Proposed Plan are shown in <u>blue</u> .		Reasons for appeal (in addition to General Reasons in Appeal above)
		<u>d. In the event of any conflict with the objectives and policies in Chapter 2 and Chapter 5 and the objectives and policies of any relevant overlay zones, scheduled sites or mapped areas, Policy 5.2.x.1 takes precedence.</u>	
	<u>Policy 5.2.x.2</u>	<u>Manage adverse effects on the National Grid by:</u> <u>a. only allowing buildings, structures, hazardous substances, public amenities, other network utilities and earthworks in the National Grid Yard where they will not compromise the operation, maintenance, upgrade and development of the National Grid;</u> <u>b. avoiding National Grid Sensitive Activities within the National Grid Yard and, to the extent reasonably possible, managing activities to avoid reverse sensitivity effects on the National Grid;</u> <u>c. managing potential electrical hazards, and the adverse effects of buildings, structures and National Grid Sensitive Activities on the operation, maintenance, upgrade and development of National Grid substations;</u> <u>d. managing subdivision within the National Grid Subdivision Corridor to avoid reverse sensitivity effects and to ensure that the National Grid is not compromised."</u>	
Policies 5.2.2.2, 5.2.2.3, 5.2.2.4,	<u>Policy 5.2.2.2</u>	Require National Grid sensitive activities, hazardous substances, buildings, structures, public amenities, network utility activities and earthworks to be set back an adequate distance from the National Grid to ensure: a. adverse effects on the health and safety of people are avoided; b. adverse effects on the operation, maintenance, upgrading and development of the National Grid are avoided or, if avoidance is not practicable, insignificant; and c. the potential for reverse sensitivity is avoided or minimised as far as practicable.	See reason above. These changes are needed as a consequence of the new objective and policy framework sought above.

Provision	Amendments sought		Reasons for appeal (in addition to General Reasons in Appeal above)
	Amendments to the decision version of the Proposed Plan are shown in <u>blue</u> .		
	<u>Policy 5.2.2.3</u>	<u>Require subdivision activities in the National Grid Corridor mapped area to be designed so that any necessary building platforms are located a sufficient distance from the National Grid to ensure that:</u> <u>a. adverse effects on the health and safety of people are avoided;</u> <u>b. adverse effects on the operation, maintenance, upgrading and development of the National Grid are avoided or, if avoidance is not practicable, insignificant; and</u> <u>c. the potential for reverse sensitivity is avoided or minimised as far as practicable.</u>	
	<u>Policy 5.2.2.4</u>	<u>Only allow subdivision activities in the National Grid Corridor mapped area where the subdivision is designed to ensure that any associated future land use and development will:</u> <u>a. avoid adverse effects on the health and safety of people;</u> <u>b. avoid or, where avoidance is not practicable, have not more than insignificant effects on the operation, maintenance, upgrading and development of the National Grid; and</u> <u>c. avoid or minimise, as far as practicable, the potential for reverse sensitivity.</u>	

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>						Reasons for appeal (in addition to General Reasons in Appeal above)
Amend 5.3.2 Activity status table – Network utility activities	“ <i>Network utility structures – large scale</i> ”		Activity status				Performance standards
			a. <i>Res and Rec</i>	b. <i>All other zones</i>	c. <i>ONF, HNCC, ONCC</i>	d. <i>SNL, NCC, ASBV, SHS, HP</i>	
	10.	<i>All other network utility structures – large scale</i>	<i>D</i>	<i>D</i>	<i>NC</i>	<i>D+</i>	The Decisions version currently applies a non-complying activity status to National Grid assets in Outstanding Natural Features (ONFs), High Natural Coastal Character Overlay Zones (HNCCs) or Outstanding Natural Coastal Character Overlay Zones (ONCCs). While currently there are few ONFs, HNCCs, and ONCCs throughout the district and these are some distance from existing National Grid assets, there remains the potential for future National Grid assets to be located in these ONFs, HNCCs and/or ONCCs. Future new generation may locate near these areas and due to technical and operational constraints (as recognised by Policy 3 of the NPSET), transmission line connections to the new generation may not be able to avoid traversing sensitive overlay zones. A route, site, method selection process will always be undertaken and all attempts made to avoid sensitive areas wherever possible (as required by Policies 4 and 8 of the NPSET). Consequently, the relief sought by Transpower is to change the activity status from non-complying to discretionary in order to give effect to the NPSET and ORPS. The relief would only apply to the National Grid, not other network utility structures.
	x.	Network utility structures – large scale (National Grid)	D	D	D	D ”	
Rule 5.6 Setbacks from National Grid and Network Utilities	5.6.1 Setback from National Grid <i>5.6.1.1 Setback from National Grid (buildings and structures, city-wide activities and National Grid sensitive activities)</i> a. <i>Buildings, structures, additions and alterations, public amenities, underground or internal network utilities (except where located within an existing building or structure), network utility structures - small scale, network utility structures – large scale, standby or temporary energy generators and National Grid sensitive activities must be set back at least:</i>						First, the deletion of the words ‘(where the prior written consent of the electricity infrastructure owner is not needed to meet those requirements)’ from clause b are required, as the words confuse the correct application and requirements of NZECP34. Applying NZECP34 in this confined manner is more stringent than is appropriate and imposes unnecessary consent requirements on plan users. Deleting these words will

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
	i. 12m from the outside edge of a National Grid support structure foundation or from the boundary of a National Grid substation; and ii. 12m from the centre line of any point of a National Grid transmission line. b. The following activities are exempt from this standard, provided either that they meet the requirements of NZECP 34:2001 <i>(where the prior written consent of the electricity infrastructure owner is not needed to meet those requirements)</i>, or that there is a minimum vertical clearance of 10m between the lowest point of the National Grid conductor and the highest point of any structure: i. network utility operation as defined in section 166 of the RMA (excluding the reticulation and storage of water for irrigation purposes); ii. fences not more than 2.5m in height and located at least 5m from a National Grid support structure; iii. artificial crop protection and crop support structures not more than 2.5m in height and located at least 8m from a National Grid pole support structure (but not a tower), provided that such structures: 1. are removable or temporary to allow a clear working space of 12m from the pole for maintenance and repair purposes; and 2. allow all weather access to the pole and a sufficient area for maintenance equipment, including a crane; iv. farming or horticultural buildings that are not used for intensive farming, milking/dairy sheds <i>(but not associated yard)</i>, produce packing facilities or commercial greenhouses and that are not residential buildings (exempt from Rule 5.6.1.1.a.ii only); v. <i>irrigation equipment (that is not a network utility operation as defined in section 166 of the RMA) used for agricultural or horticultural purposes where it does not permanently physically obstruct existing vehicular access to a National Grid support structure structures associated with irrigation or the supply of stockwater, including the reticulation and storage of water, provided that they do not permanently obstruct existing vehicular access to a National Grid support structure (exempt from Rule 5.6.1.1.a.ii only); and</i>	ensure the Proposed Plan efficiently and effectively achieves its objectives, including Objective 2.3.1 b. Secondly, Transpower seeks to amend clause b. iv. to clarify that milking/dairy sheds are not exempted from Rule 5.6.1.1 a, but their associated yards are. This is because it is the permanent and large structure of the milking/dairy sheds that can adversely affect the National Grid, but the rules do not need to capture the yard itself. Thirdly, Transpower considers that the exemption in clause b. v. of the Decisions version could be read as providing an exemption for irrigation that is a network utility and therefore does not give effect to the NPSET or ORPS. Transpower seeks to clarify the application of the exemption in clause b. v to ensure clarity in the Proposed Plan. For avoidance of doubt, Transpower does not intend to capture mobile irrigators, such as centre pivot irrigators or k-lines, as they do not permanently obstruct access to a National Grid support structure.

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
	vi. <i>in residential zones, buildings that are not residential buildings and that are less than 10m² in area and under 2.5m in height (exempt from Rule 5.6.1.1.a.ii only).</i> c. <i>Activities that contravene these standards are non-complying activities."</i>	
Rule 5.6 Setbacks from National Grid and Network Utilities	5.6.1.2 Setback from National Grid (earthworks) a. <i>The maximum depth of eEarthworks within 12m of the outer edge of a foundation of a National Grid support structure or within 12 metres of the centreline of a National Grid transmission line must is 300mm, except that the following earthworks are exempt from this standard:</i> <i>i. be no greater than 300mm in depth when within 12 metres of the outer edge of the foundation of a National Grid support structure;</i> <i>ii. not compromise the stability of any National Grid support structure;</i> <i>iii. not breach the ground to conductor clearance distances required by Table 4 of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001).</i> <i>b. The following are exempt from this standard:</i> <i>i. earthworks ancillary to the operation, repair, and maintenance of the roading network;</i> <i>ii. earthworks for the repair, sealing or resealing of a driveway or vehicle track;</i> <i>iii. earthworks that result in vertical holes less than 500mm in diameter, provided that the earthworks are located more than 1.5m from the outer edge of a National Grid pole or stay wire (this exemption does not apply to earthworks within 12m of the outer edge of National Grid towers);</i> <i>iv. earthworks associated with post holes for the erection of farm fences or horticulture structures, provided that the earthworks are located at least 5m from the outer edge of a National Grid support structure;</i> <i>v. earthworks ancillary to a network utility operation as defined in section 166 of the RMA (excluding the reticulation and storage of water for irrigation purposes) and associated access tracks, provided that the activity is undertaken in accordance with NZECP 34:2001; and</i>	The Decisions version of 5.6.1.2, in comparison to the notified version: a. deletes reference to stability of support structure, instead relying on gradient provisions elsewhere (fails to consider retaining works); b. deletes provisions that address mid-span earthworks; c. applies restricted discretionary activity status to activities that breach the standard (attributed to a clause 16 amendment) and relies on an assessment matter stating that consent would not be granted. In order to give effect to the NPSET, and for internal consistency within the Proposed Plan, Transpower seeks a more restrictive activity status for non-compliance with this performance standard. In addition, it seeks an amendment to sub-clause a. to align it with 5.6.1.1. The provisions mirror NZECP34 and as such a breach of these provisions would likely not achieve compliance with NZECP34. Non-complying activity status is the most appropriate status to signal that an activity is not likely to be appropriate (including under NZECP34).

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in <u>blue</u>.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)												
	vi. earthworks that are part of cultivation. b. Activities that contravene this performance standard are <u>non-complying activities restricted discretionary activities.</u>"													
Rule 5.6 Setbacks from National Grid and Network Utilities	<u>5.6.1.x Setback from the National Grid (subdivision)</u> <u>a. Subdivision of land in the National Grid Subdivision Corridor is a restricted discretionary activity where:</u> <u>i all resulting allotments, except allotments for access or network utilities, must demonstrate that they are capable of locating a building platform for the principal building and any dwelling or National Grid Sensitive Activity outside of the National Grid Yard; and</u> <u>ii. vehicle access to National Grid assets is maintained.</u> <u>b. Activities that contravene the setback from the National Grid (subdivision) performance standards are non-complying activities."</u>	The Decisions version does not include a specific rule, or rules, for subdivision in the National Grid subdivision corridor, rather the provisions regulate building platforms within the 'yard' only. This means that under the decisions version, assessment matters and consideration of the impact on the National Grid will not be considered for the complete subdivision corridor. The effect of the rules seems to differ to the intent expressed in the Decisions. In order to give effect to the NPSET and the ORPS Transpower seeks an expanded subdivision rule and accompanying assessment matters specific to subdivision activities.												
Rule 5.7.1 and Rule 5.7.4	3. Rules 5.7.2 and 5.7.3 apply to network utility activities performance standards generally; Rule 5.7.4 applies to performance standards for setbacks from the National Grid and network utilities. Rule 5.7.5 contains additional provisions that apply to network utility activities performance standards in overlay zones and mapped areas and on scheduled items. <table><tr><th colspan="4">5.7.4 Assessment of performance standard contraventions (setbacks from <u>National Grid and network utilities</u>)</th></tr><tr><th colspan="2">Performance Standard</th><th>Matters of discretion</th><th>Guidance on the assessment of resource consents</th></tr><tr><td>1.</td><td>Setback from National Grid (earthworks)</td><td>a. Effects on health and safety</td><td><u>Relevant objectives and policies:</u> i. Objective 5.2.2 ii. Adverse effects on the health and safety of people are avoided (Policy 5.2.2.2.a).</td></tr></table>	5.7.4 Assessment of performance standard contraventions (setbacks from <u>National Grid and network utilities</u>)				Performance Standard		Matters of discretion	Guidance on the assessment of resource consents	1.	Setback from National Grid (earthworks)	a. Effects on health and safety	<u>Relevant objectives and policies:</u> i. Objective 5.2.2 ii. Adverse effects on the health and safety of people are avoided (Policy 5.2.2.2.a).	Transpower seeks bespoke rules for Subdivision activities in the National Grid Subdivision Corridor alongside the new objective/policy framework. The changes sought reflect the change in activity status to non-complying. There is no need for standards when the activity status is non-complying. These changes are needed to give effect to the NPSET and the ORPS.
5.7.4 Assessment of performance standard contraventions (setbacks from <u>National Grid and network utilities</u>)														
Performance Standard		Matters of discretion	Guidance on the assessment of resource consents											
1.	Setback from National Grid (earthworks)	a. Effects on health and safety	<u>Relevant objectives and policies:</u> i. Objective 5.2.2 ii. Adverse effects on the health and safety of people are avoided (Policy 5.2.2.2.a).											

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in <u>blue</u>.</i>			Reasons for appeal (in addition to General Reasons in Appeal above)
			<i>General assessment guidance:</i> iii. Council will generally refuse consent if earthworks do not comply with Section 2 of the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001). <i>Potential circumstances that may support a consent application include:</i> iv. Earthworks do not create a risk of electrical hazard which affects public or individual safety or property.	
		b. Effects on efficient and effective operation of network utilities.	<i>Relevant objectives and policies:</i> i. Objective 5.2.2 ii. Adverse effects on the operation, maintenance, upgrading and development of the National Grid are avoided or, if avoidance is not practicable, insignificant (Policy 5.2.2.2.b). <i>Potential circumstances that may support a consent application include:</i> iii. Earthworks do not compromise the structural integrity of the National Grid, or the ability to gain access to National Grid infrastructure for maintenance."	
Rule 5.8.5	5.8.5 Assessment of subdivision activities in the National Grid <u>Subdivision Corridor-mapped area</u>			Extensive additions to the matters of discretion for Rule 5.8.5 (1) are needed to ensure the NPSET is given effect to.
	Activity	Matters of discretion	Guidance on the assessment of resource consents	

Provision	Amendments sought			Reasons for appeal (in addition to General Reasons in Appeal above)	
	Amendments to the decision version of the Proposed Plan are shown in <u>blue</u> .				
	1.	All Subdivision activities in the National Grid <u>Subdivision Corridor mapped area</u> .	a. Effects on health and safety i. Whether the subdivision allows for earthworks, buildings and structures to comply with the safe separation distances requirements in the New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001). ii. The provision for the on-going efficient operation, maintenance, development and upgrade of the National Grid, including the ability for continued reasonable access to existing transmission lines for maintenance, inspections and upgrading. iii. The extent to which potential adverse effects (including visual and reverse sensitivity effects) are mitigated through the location of building platforms. iv. The extent to which the design and construction of the subdivision allows for activities to be setback from the National Grid to ensure adverse effects on, and from, the National Grid and	Relevant objectives and policies: i. Objective 5.2.x2 ii. <u>Policy 5.2.x.2 Subdivision in the National Grid Corridor mapped area is designed to ensure that any associated future land use and development will avoid effects on the health and safety of people (Policy 5.2.2.4.a).</u> Design considerations that may support a consent application include: iii. The design and layout of the subdivision allows for earthworks, buildings and structures to comply with the safe separation distance requirements in the New Zealand Code of Practice for Safe Electrical Distances (NZECP 34:2001) Potential circumstances that may support an <u>application for resource consent being granted</u> application include:	

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
	<u>on public safety and property are appropriately avoided, remedied or mitigated, for example, through the location of roads and reserves under the transmission lines.</u> <u>v. The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid.</u> <u>vi. The outcome of any consultation with Transpower New Zealand Limited.</u> <u>vii. The extent to which the subdivision plan clearly identifies the National Grid and proposed building platforms.</u> iii. Written approval is obtained from the owner and/or operator of the National Grid.	
Delete 5.10.2 and 5.10.4 in their entirety.	Delete 5.10.2 Assessment of all non-complying network utility activities and 5.10.4 Assessment of non-complying performance standard contraventions.	Resource consent applications for non-complying activities are assessed under sections 104 and 104D of the RMA. There are no restrictions as to what a decision-maker can look at in relation to a non-complying activity, in contrast to restricted discretionary activities where the decision-maker is constrained by section 104C of the RMA. Assessment matters for non-complying activities are unnecessary and these provisions should therefore be deleted. Transpower also does not agree with the wording of the Assessment matters, as drafted.

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)		
Part C City-wide Provisions (Part 9 Public Health and Safety)				
Amend 9.2 Objectives and Policies, and Rule 9.3 Performances Standards	“Objective 9.2.2	Transpower seeks to delete Policy 9.2.2.12 and Rule 9.3.2 as it is not clear what is meant by ‘electrical interference’, and as such, it is not clear how these provisions may impact on Transpower’s activities. The Decisions appear to rely on the section 42A Report discussion in relation to electrical interference on radio spectrum as a reason for retaining these provisions but goes on to conclude that there may be effects of electrical interference on peoples’ health and safety. There is no evidence cited in this regard.		
	<i>Land use, development and subdivision activities maintain or enhance people’s health and safety</i>			
	<table><tr><td><i>Policy 9.2.2.12</i></td><td><i>Require activities to be designed and operated to avoid adverse effects from electrical interference on the health of people or, if avoidance is not practicable, ensure any adverse effects would be insignificant.”</i></td></tr></table>	<i>Policy 9.2.2.12</i>	<i>Require activities to be designed and operated to avoid adverse effects from electrical interference on the health of people or, if avoidance is not practicable, ensure any adverse effects would be insignificant.”</i>	
<i>Policy 9.2.2.12</i>	<i>Require activities to be designed and operated to avoid adverse effects from electrical interference on the health of people or, if avoidance is not practicable, ensure any adverse effects would be insignificant.”</i>			
	9.3.2 Electrical Interference 1. Activities must be designed and located to ensure that there are no effects from electrical interference on surrounding sites. 2. Activities that contravene this performance standard are restricted discretionary activities. ... 9.3.4 Hazardous Substances Quantity Limits and Storage Requirements ... 3. The following facilities and quantities are exempt from this standard: ... j. activities involving substances of HSNO sub-classes 1.4, 1-5 , 1.6, 6.1D, 6.1E, 6.3, 6.4, 9.1D and 9.2D unless other hazard classification applies; and ...			
Amend (as a consequence) Rule 9.4 Assessment of Restricted Discretionary Activity (Performance	9.4.3 Assessment of performance standard contraventions	See reason above. These changes are needed as a consequence of the new objective and policy framework related to electrical interference sought above.		
	<table><tr><td><i>Performance Standard</i></td><td><i>Matters of discretion</i></td><td><i>Guidance on the assessment of resource consents</i></td></tr></table>		<i>Performance Standard</i>	<i>Matters of discretion</i>
<i>Performance Standard</i>	<i>Matters of discretion</i>	<i>Guidance on the assessment of resource consents</i>		

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in <u>blue</u>.</i>				Reasons for appeal (in addition to General Reasons in Appeal above)
Standard Contraventions)	6	<u>Electrical Interference</u>	<u>a. Effects on health and safety</u>	<u>Relevant objectives and policies:</u> <u>i. Objective 9.2.2</u> <u>ii. Activities are designed and operated to avoid adverse effects from electrical interference on the health of people or, if avoidance is not practicable, ensure and adverse effects are insignificant."</u>	
Part D Management Zones					
Amend (as a consequence) Land Use Performance Standards 15.5, 16.5, 17.5, 18.5 and 19.5	<u>"15.5.3 Electrical Interference</u> <u>Land use activities must comply with Rule 9.3.2."</u>				See reason above. These changes are needed as a consequence of the new objective and policy framework related to electrical interference sought above.
Amend (as a consequence) Rules 15.7, 16.7, 17.7, 18.7, 19.7, and 20.7 Subdivision Performance Standards	"2. Building platforms must have a slope of 12° (1:4.7 or 21%) or less and must: ... <u>c. be located at least 12m for the outer edge of a National Grid support structure or centreline of an overhead National Grid transmission line."</u>				See reason above. These changes are needed as a consequence of the new objective and policy framework related to subdivision sought above.
Amend (as a consequence) Rules 15.7, 16.7, 17.7, 18.7, 19.7, and 20.7 Subdivision Performance Standards	<u>"[15.7.x/16.7.x/17.7.x/18.7.x/19.7.x/20.7.x] Setback from the National Grid Subdivision activities in the National Grid Subdivision Corridor must comply with Rule 5.6.1.x."</u>				See reason above. These changes are needed as a consequence of the new objective and policy framework related to subdivision sought above.
The Plan Maps					
Amend	Delete the 'National Grid Corridor Mapped Area' notation.				As explained above in relation to the relief for two new definitions of 'National Grid Subdivision Corridor' and 'National Grid Yard', the Proposed Plan shows the

Provision	Amendments sought <i>Amendments to the decision version of the Proposed Plan are shown in blue.</i>	Reasons for appeal (in addition to General Reasons in Appeal above)
	Add the 'National Grid Transmission Lines' notation, which will be a line through the centre of the deleted 'National Grid Corridor Mapped Area' notation.	'National Grid Corridor Mapped Area' on the Plan Maps, however this is not the most appropriate way to provide for the effective operation, maintenance, upgrading and development of the transmission network as required by the NPSET. The relief sought is to insert the two new definitions, and to make associated amendments to the Planning Map. Transpower considers this more appropriately gives effect to the NPSET.