



T R A N S P O W E R

**Submission by Transpower New Zealand Limited on the Draft National
Planning Standards (Ministry for the Environment)**

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Introduction

1. The Draft National Planning Standards (the Draft Standards) have been promulgated in response to a requirement of Section 58G the Resource Management Act 1991 (of the RMA) that the Minister for the Environment must have approved a first set of National Planning Standards by mid-April 2019. These must address structure and form (including references to national-level planning instruments), definitions and electronic functionality and accessibility of plans.
2. As owner and operator of the National Grid, Transpower New Zealand Limited (Transpower) has actively participated in RMA processes since the inception of that legislation. The National Grid traverses every district and region in New Zealand, except Kaikoura, Gisborne and the Chatham Islands. It also traverses parts of the coastal marine area adjacent to several regions. The National Grid comprises a wide range of assets, from transmission lines of various capacities (both overhead and underground), to substations and switch yards, and the associated infrastructure such as stormwater treatment and discharge systems and communications infrastructure.
3. Transpower thus has a significant interest in changes in RMA practice, including the Draft Standards.
4. In making this submission, Transpower answers some of the questions raised in the Ministry discussion document, where they are relevant to Transpower's activities.

Overall comment on the Draft National Planning Standards

5. On balance, Transpower considers that there could be long-term merit in the Draft Standards. However, it has concerns about:
 - a. Incorporation of the definitions into plans requiring large-scale amendment to plan provisions – and potential inadvertent changes to the intent of the provisions occurring; and
 - b. There being no mechanism for inadvertent changes being corrected, particularly where the Schedule 1 process is not used.
6. Transpower considers that this issue could be avoided if there was some mechanism for correcting inadvertent changes to the intent of provisions. Potential mechanisms could be rights of objection (i.e. an extension of section 357 of the RMA), submissions to correct minor defects, errors or omissions (as occurs under section 149RA of the RMA in relation to Board of Inquiry decisions), or an extension of Clause 16 and/or Clause 20A of Schedule 1 of the RMA (in relation to alterations of minor effect or correction of minor errors).

National Planning Instruments Relating to the National Grid

7. Since the National Policy Statement on Electricity Transmission 2008 (the NPSET) came into effect, Transpower has found it somewhat more straight-forward to achieve suitable provisions in plans, particularly district plans, than previously. The NPSET recognises the

national significance of the National Grid and requires councils to recognise and provide for its effective operation, maintenance, upgrading and development in RMA policies and plans.¹ A number of councils have given effect to the NPSET by including policy and other provisions in plans.

8. The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (the NESETA) provide nation-wide standards for the operation, maintenance, upgrading, relocation and removal of existing² National Grid transmission lines. The NESETA allows for maintenance activities, but also for a level of upgrading, as permitted activities, and establishes the rule status for other types of activities relating to National Grid lines. Substations are not covered by the NESETA.
9. Transpower generally seeks to secure its new developments through designations and has also achieved designation status (often retrospectively) for many of its substations and switchyards. A small number of substations and switchyards around the country however rely on specific provisions in plans to provide for their ability to be modified or to operate outside existing use rights.

Response to National Planning Standards Consultation Document

Question: What topics or matters should be investigated for future standards?

Protection of the National Grid – corridor provisions

10. While the NESETA provides for established National Grid transmission line activities, the protection of the National Grid relies on rules in plans (primarily in district plans, and in the district components of unitary plans) to give effect to policies 10 and 11 of the NPSET. Transpower has developed an approach to these policies, based on a National Grid corridor, which has been included in a range of forms in plans.
11. Transpower considers that the National Grid corridor protections are one topic or matter that should be investigated for future standards. We consider corridor protections to be worthy of further investigation as there is a degree of certainty about the restrictions that are applied across the country to date, but a large degree of variability in plan drafting.
12. **Attachment A** sets out the restrictions that have been obtained in plans. It shows that since 2012 there has been consistent restrictions obtained in district plans. While this consistency has been obtained, no one plan is consistent in terms of the approach to drafting of provisions.
13. It is the consistency of restriction that Transpower considers makes the corridor provisions a useful topic to investigate for future standards. Transpower is willing to work with the

¹ NPSET Policy 2

² The NESETA only applies to National Grid transmissions lines which were existing on 14 January 2010, when the regulations came into force.

Ministry and relevant industry groups (such as Federated Farmers and Horticulture New Zealand) to investigate potential standards further.

Network Utility Rules

14. A further matter that may be useful to investigate for future standards is network utility rules. Transpower has been involved in a National Planning Standards network utility working group. This group is in the process of developing a set of provisions, from RPS through to district plan rules provisions.
15. Transpower considers there should be a degree of consistency in the types of rules that apply to network utilities throughout the country. However, we have not undertaken an audit of the degree of variability in relation to the rules.
16. We are less certain about the benefits of network utility objectives and policies being incorporated into the standards. The reasons for this are uncertainty are:
 - a. Network utilities are a subset of infrastructure groups – there are likely to be good reasons why any objectives and policies should also apply to the broader infrastructure operators (including efficiency of plan provisions). Some plans have included objectives and policies for energy – including the electricity industry as a whole;
 - b. It appears to be the intention of the Draft Standard that Infrastructure and Energy are treated together – see theme 4; and
 - c. Changes to objectives and policies may be required to address the government’s climate change commitments. While this is developing area, it may be prudent to avoid including objectives and policies in a Draft Standard until this is more thoroughly explored.

Question: What are your thoughts on this proposed package of planning standards? If you consider changes necessary, how would these affect the anticipated outcomes?

Risks of Inadvertent Errors in implementing the Draft National Planning Standards

17. At page 25, the Discussion Document recognises that “Long-term benefits outweigh costs, but short-term costs for some councils are a concern”. This section of Transpower’s submission sets out Transpower’s concerns in relation to implementation of the draft National Planning Standards – that if not correctly managed, the implementation process could undermine those long-term benefits.
18. The Draft Standards propose to organise and formalise the structure and content of regional policy statements, regional and district plans and unitary plans. Transpower considers that the realignment of plans carries a cost and a risk for organisations, such as Transpower. This is because the plans which are required to be brought into line with the new standards are highly diverse. There are many complex and subtle provisions which currently may provide a

suitable planning framework for Transpower, but which may be inadvertently lost because of the reorganization of provisions required by the Draft Standards.

19. The varied definitions of “functional need” across district plans illustrate the complexity of implementing definitions. Transpower seeks that district plans recognise the operational, technical, locational and functional constraints of the National Grid. Depending on the plan, these concepts could be merged into the definition of “functional need”. An example of this is the definition in the Environment Bay of Plenty Regional Coastal Plan. This plan defines “functional need” as follows:

“A need or requirement that must be met in order for a structure, development, network or building to operate including the technical and operational requirements of the National Grid. For example, a marina has a functional need to be located in water. Other common examples include shipping lanes and anchorages, ports, and aquaculture, and some infrastructure such as stormwater pipes.”
20. The definition in the Draft Standards is not as broad. To avoid changing the intent of the plan provisions, Environment Bay of Plenty would need to make consequential changes to all provisions that use “functional need”. Later in this submission, Transpower comments on the definition proposed in the Draft Standards, and suggests it is broadened to include locational, technical and operational requirements.
21. While the current diversity of plans, and plan provisions, is not desirable, it is likely that Transpower will nevertheless need to evaluate every plan as it realigns with the new standard. It will need to make sure the provisions which were formerly achieved through participation in the plan development or review process have not become modified or even lost, however the RMA provides limited opportunity for this outcome to be avoided.
22. RMA section 58I sets up procedural requirements for local authorities in meeting the National Planning Standards once they are promulgated. This provides that some amendments must be made without RMA Schedule 1 processes, but others must apply a Schedule 1 process.
23. Because of the Draft Standards,³ it is likely that many of the plans will look quite different from their present format. While it is acknowledged that many provisions in the current draft are worded in a way that appears to provide a level of discretion, others, such as the definitions, do not. It will be difficult in some cases for local authorities, in meeting the National Planning Standard requirements, to maintain their current planning regime without involving Schedule 1 processes.
24. This will place a burden on organisations such as Transpower, which will need to check the modified plans, which are all to be modified in two tranches on a specific timeframe. Section 58I(5) provides that the changes (whether they use a Schedule 1 process or not), have immediate effect, adding further risk to the process if local authorities do not undertake the realignments being cognisant of the detail of how the plan currently works.

³ Regardless of submissions made on the current draft.

25. Further, the process to be applied if a provision is not identical (due to, for example, the application of a new or changed mandatory definition) to the provision that preceded it, but the local authority has not included it in a Schedule 1 procedure, appears not to be set out within the RMA. Such circumstances may disadvantage those who participated in a previous planning process and were satisfied with the outcome, including items that may have been addressed through recourse to the Courts.
26. Transpower has identified the potential for risks arising from the introduction of new definitions, and for uncertain process if a local authority does not use the correct procedure.
27. If procedural matters are not clarified, it is likely that local authorities will conservatively apply Schedule 1 processes, adding to the burden for national agencies of checking and participating in numerous plans simultaneously.
28. Potential options for implementing the draft Planning Standard in a way that avoids the Schedule 1 process, but provides for correction of inadvertent errors are:
 - a. Rights of objection (i.e. an extension of section 357 of the RMA);
 - b. Submissions to correct minor defects, errors or omissions (as occurs under section 149RA of the RMA in relation to Board of Inquiry decisions); or
 - c. Extension of Clause 16 and/or Clause 20A of Schedule 1 of the RMA (in relation to alterations of minor effect or correction of minor errors).

Comments on Specific Standards

29. Transpower wishes to make several comments on the individual standards. These are set out in the following paragraphs.

Inclusion of National direction instruments

30. Transpower notes the inclusion of a section dealing with National direction instruments in all documents⁴. While this may be helpful to users of the documents, it will also date unless all subsequent instruments include a National Planning Standard that requires updating of the documents (which would occur without a Schedule 1 process). Provision for this may need to be made within the RMA itself.

Use of the term "Landforms"

31. Transpower notes the frequent use of the term "landforms" in the Draft Standards. This term is undefined and is not used in the RMA. It appears that this term may be intended to be "natural feature"⁵, which may include features which are not landforms (such as lakes, rivers, wetlands, springs, geologically significant areas). Transpower considers that this requires correction to properly reflect the RMA.

⁴ As defined in RMA Section 58I.

⁵ RMA Section 6(b).

Theme 4 – Infrastructure and Energy

32. Transpower supports the inclusion of a separate infrastructure and energy “theme” in Part 4 of the draft Regional Policy Statement Structure Standard, the District Plan Standard and the Combined Plan Standard.
33. The Draft Regional Plan Structure Standard includes Infrastructure and Energy as a specific theme. While recognising that this may be appropriate for some types of activities, it is more common for regional plans to address relevant elements of infrastructure and energy (such as discharges to air, water or land) under groupings of provisions relating to RMA sections 12 to 15. While this would appear not to be limited by the listing of “themes” in the Standard, the inclusion of a separate Infrastructure and Energy theme in the Draft Standard may result in additional complexity in such plans. It may be appropriate to limit the theme to objectives and policies, rather than rules to avoid this complexity.

Draft Introduction and General Provisions Standard

34. The Draft Introduction and General Provisions Standard provides mandatory directions for councils to amend their planning documents within 5 years of gazettal of the Draft Planning Standard. There is a two-year extension, to 7 years, for listed councils, including Auckland Council.
35. Transpower has some concerns about the National Planning Standard being applied to Auckland. The corridor provisions in the Auckland Unitary Plan (Operative in Part) were resolved after both Environment Court and High Court appeals. While the restrictions are generally similar to the corridor provisions sought in other district plans, the mapping of the corridor is very different:
 - a. Spans are mapped as compromised or uncompromised, depending on the degree of building under the lines;
 - b. The corridor that applies to subdivision is mapped on a span by span approach, rather than the more generic approach that applies elsewhere.
36. We consider that the mapping of the subdivision corridor on a span by span approach is limited to Auckland. It resulted from significant work, including peer review by a council engineer. We consider that costs of applying such an approach elsewhere in the country would outweigh any benefit. We also consider that moving away from the approach in Auckland would not be beneficial.
37. Instead, we consider that it would be appropriate for the National Planning Standards to provide an exemption for certain plans/provisions. In this regard, we consider that it would be appropriate for the Auckland Unitary Plan corridor overlay to continue to apply, and Auckland be exempted from applying any future content-based standards in relation to policies 10 and 11 of the NPSET. The Auckland Unitary Plan situation lends itself to local variation provided for under Section 58D(2)(c).

38. Under the Draft Introduction and General Provisions Standard, Tables 13, 14 and 15⁶ includes a list of National direction instruments, including the dates of versions. This table is likely to date quickly. As noted above, unless all subsequent changes to these documents include a National Planning Standard direction to update the documents without a Schedule 1 process, Table 13 could be expected to hinder application of the National direction instruments as it will retain the application of the dated standard until any change is formally adopted through a Schedule 1 process.

Draft Area Specific Matters Standard (S-ASM)

39. In the Draft Area Specific Matters Standard (S-ASM), Table 16 sets out the requirements for a Designation Table. This is generally as would be expected in a district or combined plan, but there are three key differences:
- The date of the designation is not included. This is much more important than the lapse date and should be included.
 - The lapse date or identification that designation has been given effect to. Further consideration should be given to whether this detail should be included, as it would require a change to the plan when effect is given. Designations have worked effectively in the past without such a provision.
 - A “*designation hierarchy (primary or secondary)*” is listed as a required item. “Primary or secondary” designations are not defined in the RMA or the Draft Standard and so it can only be speculated as to what this means. It is envisaged that the intention of this item is to establish priority when there are overlapping designations. However, this can be achieved by simply identifying the original date of the designation. Transpower’s designations cross numerous other designations and it would be unrealistic to identify all such areas of land and nominate them as “primary or secondary”.

Infrastructure and Energy (S-IE)

40. In the District Wide Matters Standard, under the Infrastructure and Energy chapter (S-IE), Item 23(a)(x) references provisions relating to “*any buffer corridor area provisions required for the National Grid*”. The “buffer corridors” required by policies 10 and 11 of the NPSET apply to all National Grid assets, not merely transmission lines. Item 23(a)(x) could be amended to clarify that corridors can apply to overhead and underground lines and substations.
41. It is usual for earthworks provisions and limitations to be included within rules relating to National Grid corridors and other provisions. Item 33 requires any earthworks provisions to be included in the *Earthworks* section. To have to separate these out into other sections will be to the disadvantage of landowners who need to be aware of all the provisions that relate to the corridor or other restriction, and also to Transpower in having to continue to educate plan administering officers.

⁶ This tabulation appears to be poorly formatted and requires reconsideration.

Draft Mapping Standard (F-2)

42. The Draft Mapping Standard (F-2) includes specific symbols for the National Grid Line and the National Grid Underground Cable. Transpower notes that it may be necessary to distinguish different types of corridors around transmission lines (for example in the Auckland Unitary Plan different scales of hatching are used to identify compromised and uncompromised spans) and local authorities should be able to do that by varying the symbols.

Draft Spatial Planning Tools (District) Standard (F-4)

43. Transpower assumes that, for example, in Table 24 “buffer corridors” and other provisions to protect the National Grid would come under the heading of “overlay” or “specific control”. The inclusion of this type of Spatial Planning Tool is supported.

Specific Comments on CM-1: Draft Definitions Standard

44. The following terms are included in the definitions and have importance in relation to the policy or protective provisions that have been included in plans. Transpower would seek to retain the current wording for these definitions in the Draft Standard:

- Abrasive blasting
- Addition
- Dry abrasive blasting
- Habitable room
- Land disturbance
- Wet abrasive blasting

45. Transpower would seek changes to the following definitions:

- Functional need – as currently worded, this reads: “... *the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment*”. This needs to be broader if it is to align with Transpower’s NPSET requirements under Policy 3 which refers to technical and operational requirements. More suitable wording would be: “*the locational, operational, practical or technical needs of an activity, including development and upgrades*”.
- The definition of reverse sensitivity is useful but needs to be extended to provide for approved activities (whether by resource consent or designation) which are not yet established. This could be addressed by adding “*or approved*” following “*established*” in the current draft definition.
- Earthworks – Transpower does not support the definition of earthworks, as it has the potential to undermine the operative District Plan rules for earthworks around the National Grid if relied upon instead of “land disturbance”. The definition

currently reads: *“means any land disturbance that changes the existing ground contour or ground level.”* Earthworks that does not change the existing ground contour or ground level has the potential to undermine the National Grid and would be exempt from regulation where this definition is relied upon. Also, it is not clear whether the change to existing ground contour or ground level would apply temporarily during the earthworks, or after the earthworks are complete (or both). Transpower’s observation is that only the land disturbance definition would be workable within operative District Plan rules as they relate to the National Grid. This is a detail that could easily be overlooked or misunderstood when the definitions are implemented.

46. Other definitions which could usefully be added could be “noise-sensitive activity” and “early childhood facility”.

Conclusion

47. Transpower welcomes the opportunity to submit on the Draft Standards and would welcome any opportunity to discuss the matters raised in detail prior to their finalisation.

Attachment B: District Plans in New Zealand implementing the NPSET

The table below contains a high-level summary of the provisions of various District Plans which have given effect to the NPSET through district plan reviews or plan changes. Transpower has not identified provisions that were operative pre-2012. Transpower generally sought much wider corridors at this time. For example, Ashburton includes a corridor of 32m either side of the centreline of transmission lines where all land use is restricted. Waimakariri includes a 100m corridor.

District Council Plan	Date provisions made operative (or beyond challenge)	Land use rules within 12m National Grid Yard	Activity status of new sensitive activities in 12m National Grid Yard	More permissive activity status for additions, external alterations for, change of use to, sensitive activities within the 12m National Grid Yard?	Activity status of subdivision within wider corridor (up to 39m)	Activity status of subdivision if building platform is located in the National Grid Yard
Upper Hutt City	September 2012	Yes ⁷	NC	No	RD ⁸	D ⁹ NC ¹⁰
Ashburton	November 2012	Yes ¹¹	NC ¹²	No	Status depends on zone ¹³	NC ¹⁴
Kaipara	August 2013	Yes ¹⁵	NC	No	RD	D ¹⁶
Western Bay of Plenty	August 2013	Yes ¹⁷	NC	No	Status depends on zone ¹⁸	NC
Horowhenua	September 2013	Yes ¹⁹	NC ²⁰	No	C ²¹	RD ²²
Rangitikei	September 2013	Yes ²³	D ²⁴	No	RD ²⁵	D
Whangarei	November 2013	Yes ²⁶	NC ²⁷	No	RD	NC
Waimate	December 2013	Yes ²⁸	NC	No	RD	NC
Hauraki	February 2014	Yes ²⁹	NC	No	RD	RD ³⁰

⁷ Rule 18.2 (Residential Zone); Rule 19.1 (Rural Zone – between 12 and 32 metres)

⁸ Rule 18.1 (Residential Zone – 20 metre setback), Rule 19.1 (Rural Zone – 32 metre setback), Rule 20.1 (Business Zone); Rule 22.1 (Special Activity Zone)

⁹ Rule 18.1 (Residential Zone);

¹⁰ Rule 19.2 (Rural Zone)

¹¹ Standard 3.10.8 (Rural Zone – note this relates to any new building or structure, does not distinguish between sensitive or non-sensitive activities)

¹² Rule 3.8.6 (Rural Zone – relates to any new activity, not just sensitive activities)

¹³ Rule 9.7.3: Controlled, Rule 9.7.4: Restricted Discretionary, Rule 9.7.5: Discretionary

¹⁴ Rule 9.7.6 and Critical Standard 9.9.8 (Requires that no building platforms be located within 12 metre setback)

¹⁵ Rule 12.10.28.

¹⁶ No scope to seek NC status when Transpower's appeal was settled.

¹⁷ Rules 18.3.5, 18.4.1(o) and 18.4.2(a).

¹⁸ Rule 18.3.2: Controlled, Rule 18.3.3: Restricted Discretionary, Rule 18.3.4: Discretionary.

¹⁹ Performance Standard 19.6.14(a) (Rural Zone)

²⁰ Rule 19.5.5(a) (Rural Zone)

²¹ The rural subdivision rules were subject to a plan change (PC20) which occurred prior to the review of the Plan. The reviewed plan (Operative July 2015) did not include those provisions subject to the earlier plan change. Therefore, the older 'high voltage transmission line' provisions are still operative i.e. no part of the dwelling may be located within 20 metres of the line, and limited discretionary status for subdivision that cannot meet the 20 metre dwelling setback rule.

²² See footnote above

²³ Rule B1.13.

²⁴ Rule B7.

²⁵ Rule B11.8.

²⁶ Rules NTW2.4-2.6.

²⁷ NTW.3. Discretionary status for activities within the Business 3 and Living 1 Environments due to scope.

²⁸ Rule 12.28 and zone standards 8.8 and 7.15.

²⁹ Rule 8.2A.1.3.

³⁰ No scope to seek default to NC status when Transpower's appeal was settled.

District Council Plan	Date provisions made operative (or beyond challenge)	Land use rules within 12m National Grid Yard	Activity status of new sensitive activities in 12m National Grid Yard	More permissive activity status for additions, external alterations for, change of use to, sensitive activities within the 12m National Grid Yard?	Activity status of subdivision within wider corridor (up to 39m)	Activity status of subdivision if building platform is located in the National Grid Yard
Central Otago	July 2014	Yes ³¹	NC	No	RD	RD ³²
Southland	October 2014	Yes ³³	NC	No	D	NC
Matamata-Piako	December 2014	Yes ³⁴	NC	No	RD ³⁵	NC ³⁶
Rotorua	April 2015	Yes	D ³⁷ NC ³⁸	No	RD ³⁹	NC ⁴⁰
Hamilton City	May 2015	Yes ⁴¹	NC ⁴²	No	RD ⁴³ NC ⁴⁴	NC
Waipa	May 2015	Yes ⁴⁵	NC ⁴⁶	No	RD ⁴⁷	NC ⁴⁸
Clutha	May 2015	Yes ⁴⁹	NC ⁵⁰	No	RD	RD ⁵¹
Grey	July 2015	Yes ⁵²	D (until 10 July 2018, when such activities would become non-complying activities)	No ⁵³	C	D (until 1 July 2018, when such activities would become non-complying activities)
South Waikato	July 2015	Yes ⁵⁴	NC	No	RD	NC
Hutt City	Jun 2016	Yes ⁵⁵	NC ⁵⁶	N	RD	NC ⁵⁷

³¹ Rule 12.7.8(i).

³² No scope to seek default to NC status when Transpower's appeal was settled.

³³ Rural 1.8(2), 5 and 7(7), Sub 2.

³⁴ Part B, Rule 3.5.1

³⁵ Rule 6.1.1.11

³⁶ Standard 6.1.3(x)(c)

³⁷ Rule 4.1.48

³⁸ Closer than 8 metres to a pole or closer than 12 metres to a tower support structure - Rule 4.1.49

³⁹ Rule 13.5.11 (Residential Zones), 13.6.8 (City Centre Zones); 13.7.9 (Commercial 5 Zone); Rule 13.11.10 (Reserves, Community Assets & Water Zones);

⁴⁰ Table 13.5.1.12

⁴¹ Rule 25.7.6.1 National Grid Buildings and Structures

⁴² 25.7.4 Rules – Activity Status – Electricity National Grid Corridor

⁴³ Table 23.3a

⁴⁴ Table 23.3b where no approved Concept Development Plan in the Medium Density Residential and Rototuna Town Centre Zones and Te Rapa North Industrial Zone

⁴⁵ Performance Standards 2.4.2.32 (Residential Zone); 3.4.2.11 (Large Lot Residential Zone); 4.4.2.75 (Rural Zone)

⁴⁶ Rules 2.4.1.5 (Residential Zone); 3.4.1.5(d) (Large Lot Residential Zone); 4.4.1.5 (Rural Zone); 5.4.1.5 (Reserves Zone – any building)

⁴⁷ Table 15.4.1

⁴⁸ Rule 15.4.2.24

⁴⁹ Rule AME.9

⁵⁰ Rule AME.10

⁵¹ Rule SUB4.C.2 requires allotments within the National Grid Subdivision Corridor to identify a building platform outside the Yard however there is no apparent express provision dealing with non-compliance with this requirement.

⁵² Rules 16.7, 17.7, 18.7, 19.7, 20.7, and 25.2.10.

⁵³ Physical alterations of existing buildings where the degree of non-compliance does not increase, are permitted.

⁵⁴ Rules 10.3.1, 18.3.4, 18.4.1.

⁵⁵ Chapter 13.4

⁵⁶ Rule 13.4.2(a)

⁵⁷ Rule 11.2.3.2

District Council Plan	Date provisions made operative (or beyond challenge)	Land use rules within 12m National Grid Yard	Activity status of new sensitive activities in 12m National Grid Yard	More permissive activity status for additions, external alterations for, change of use to, sensitive activities within the 12m National Grid Yard?	Activity status of subdivision within wider corridor (up to 39m)	Activity status of subdivision if building platform is located in the National Grid Yard
Napier City	June 2016	Y ⁵⁸	NC ⁵⁹	No	RD ⁶⁰	NC ⁶¹
Porirua City	June 2016	Y ⁶²	NC ⁶³	No	RD ⁶⁴	NC
Hastings	November 2016	Y ⁶⁵	NC ⁶⁶	No	RD ⁶⁷	NC ⁶⁸
Far North	April 2017	Y ⁶⁹	NC ⁷⁰	No	C ⁷¹	NC ⁷²
Thames-Coromandel	May 2017	Y ⁷³	NC ⁷⁴	No	RD and D ⁷⁵	NC ⁷⁶
Whakatane	May 2017	Y ⁷⁷	NC ⁷⁸	No	RD ⁷⁹ (NC in Community and Cultural Zone)	NC ⁸⁰
Whanganui	May 2017	Y ⁸¹	NC ⁸²	No	RD ⁸³	NC ⁸⁴
South Taranaki	May 2017	Y ⁸⁵	NC ⁸⁶	No	RD ⁸⁷	NC ⁸⁸
Christchurch City	May 2017	Y ⁸⁹	NC ⁹⁰	No	RD ⁹¹	NC ⁹²

⁵⁸ Rule 53.10
⁵⁹ Rule 53.22
⁶⁰ Rule 53.18
⁶¹ Rule 53.23
⁶² Chapters D3, D4, D5, D6, D7
⁶³ Rule D3.1.5
⁶⁴ Chapters D3, D4, D5,
⁶⁵ Chapter 22
⁶⁶ Rule 22.1.5.9
⁶⁷ Rule 15.1.9.1 and Rule SLD28
⁶⁸ Rule SLD28
⁶⁹ Chapter 17
⁷⁰ Rule 17.2.6.5
⁷¹ Rule 13.7.4
⁷² Rule 13.11
⁷³ Section 30.3 Rule 2
⁷⁴ Rule 30.3
⁷⁵ Rule 38.5 (RD), Rule 38.6 (D – rural)
⁷⁶ Rule 38.6 Rules 9 and 10
⁷⁷ Chapter 20
⁷⁸ Rule 20.2.8.3
⁷⁹ Rule 20.2.1.14
⁸⁰ Rule 20.2.1.16
⁸¹ Chapter 3 and Chapter 4
⁸² Rule 3.8.4 and Rule 4.4.5
⁸³ Rule 3.4.2, Rule 3.8.2, Rule 13.4.4
⁸⁴ Rule 13.4.4
⁸⁵ Section 3
⁸⁶ Rule 3.1.5
⁸⁷ Rule 9.1.3
⁸⁸ Rule 9.1.5
⁸⁹ Various, including Chapter 6, Chapter 14, Chapter 16
⁹⁰ Various, including Chapter 6, Chapter 14, Chapter 16
⁹¹ Rule 8.3.2.2
⁹² Rule 8.3.2.2

District Council Plan	Date provisions made operative (or beyond challenge)	Land use rules within 12m National Grid Yard	Activity status of new sensitive activities in 12m National Grid Yard	More permissive activity status for additions, external alterations for, change of use to, sensitive activities within the 12m National Grid Yard?	Activity status of subdivision within wider corridor (up to 39m)	Activity status of subdivision if building platform is located in the National Grid Yard
Hurunui	May 2017	Y ⁹³	NC ⁹⁴	No	RD (except Rural: C) ⁹⁵	NC ⁹⁶
Invercargill	October 2017	Y ⁹⁷	NC ⁹⁸	No	D ⁹⁹	NC ¹⁰⁰
Auckland (Unitary)	November 2017	Y ¹⁰¹	NC ¹⁰²	No	RD ¹⁰³	NC ¹⁰⁴
Palmerston North City	April 2018	Y ¹⁰⁵	NC ¹⁰⁶	No	RD ¹⁰⁷	NC ¹⁰⁸

⁹³ Sections 3 and 4

⁹⁴ Rule 3.4.3.11 and Rule 4.6.13

⁹⁵ Section 5

⁹⁶ Rule 5.4.2.

⁹⁷ Section 3.9

⁹⁸ Rule 3.9.5

⁹⁹ Rule 3.18.3

¹⁰⁰ Rule 3.18.6(L)

¹⁰¹ Chapter D26

¹⁰² Table D26.4.1 Rule A1

¹⁰³ Table D26.4.1 Rule A34

¹⁰⁴ Table D26.4.1 Rule A22

¹⁰⁵ Rule R23.6.5(b)

¹⁰⁶ Rule R23.11.1

¹⁰⁷ Rule R7.17.1.2

¹⁰⁸ Rule R23.10.2