

10 March 2025

Attention: The Hearings Panel
via email: c/-regionalplan@gw.govt.nz

For the Attention of the Hearings Panel for Proposed Change 1 to the Natural Resources Plan for the Wellington Region

Transpower New Zealand Limited (“**Transpower**”) writes in relation to Proposed Change 1 to the Natural Resources Plan (“**NRP**”) for the Wellington Region and Hearing Stream 2 - Objectives and Ecosystem health policies, commencing on 17 April 2025.

Given the confined nature of Transpower’s interest to the hearing topic, and the favourable nature of the officer recommendations, Transpower does not intend to appear before the panel and provide evidence at this hearing. Rather it respectfully requests that this letter be tabled for the Panel’s consideration, to confirm its position in relation to its submission points and the Section 42A Report recommendations.

Transpower confirms it will prepare evidence and attend at the subsequent hearing tranches where its more substantive submission points will be considered. This is particularly relevant given the officer recommended deletion of WH.P2 and P.P2, with the matters relating to unplanned greenfield development to be addressed at Hearing Stream 4 (Stormwater).

The following provides an overview of the original submission points of relevance to this hearing, and response to the S42A Report recommendations.

Submission points

Specific to this tranche of hearing topics, Transpower lodged five original submission points. A summary of the points is set out below:

Whaitua Te Whanganui-a-Tara

S177.018: WH:O1 - Sought recognition that natural character is restored ‘to the extent practicable’, recognition that restoration of natural character across all freshwater bodies is not a reasonably achievable objective.

S177.020: WH:P2 – Sought deletion of reference to ‘unplanned greenfield development’ on the basis the term is broad and uncertain and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Concerns also raised with the directive nature of the wording relating to financial contributions.

Te Awarua-o-Porirua Whaitua

S177.044: P:O1 - Sought recognition that Mauri is restored and waters are in a natural state ‘to the extent that this is possible’.

S177.046: P:P2 – Sought deletion of reference to ‘unplanned greenfield development’ on the basis the term is broad and uncertain and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Concerns also raised with the directive nature of the wording relating to financial contributions.

Maps

S177.079: Sought amendment of the GIS mapping of riverine environments described in Map 77 to accurately reflect the habitat extents covered by Schedule F1.

Response to S42A Report recommendations

Transpower has carefully reviewed the S42A Report recommendations and as outlined in the attached table, supports/accepts the S42 Report recommendations on all the Transpower submission points.

Hearing appearance

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

A particular issue raised in the Transpower submission was in relation to the general approach taken by PC1 to "unplanned greenfield development". Transpower has concerns the approach is inappropriate because the definition of "unplanned greenfield development" is broad and uncertain. In particular, it is unclear whether all development is prohibited by the approach, or just specific kinds of urban development. As a result, the approach could prohibit works associated with the maintenance, upgrading and development of regionally significant infrastructure (including the National Grid) in areas identified as "unplanned greenfield development areas", where such works are considered to be "greenfield development". If the maintenance, upgrading, or development of the National Grid was caught by the policies and rules that prohibit "unplanned greenfield development", this would clearly be contrary to the objective of the NPSET, which is to facilitate 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. It would also be contrary to policy 14 of the NPSET, which requires that regional councils include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses. While Transpower supports the officer recommended deletion of WH.P2 and P.P2 (which relates to *unplanned greenfield development*), it reserves its position on the wider issue.

For clarity, Attachment A to this letter outlines the relief sought by Transpower, the S42A recommendations and Transpower's response to those recommendations

Should the Panel see benefit in Transpower appearing before the Panel in relation to this tabled statement, Transpower can readily make itself available. Please contact Rebecca Eng at environment.policy@transpower.co.nz or 09 590 7072.

Yours faithfully



Rebecca Eng
Technical Lead – Environmental Policy
TRANSPOWER NEW ZEALAND LIMITED


Attachment A – Summary of Transpower Original Submission Points – Hearing Stream 2

Specific plan provision as notified	Sub Point	Submission – Relief sought and reasoning	S42A Report recommendation	Response to S42A recommendation
Chapter 8: Whaitua Te Whanganui-a-Tara Section 8.1: Objectives				
<p>Objective WH.O1: <u>The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is waiora by 2100.</u></p>	S177.018	<p>Amend</p> <p>Relief sought: <i>Objective WH.O1</i></p> <p><i>The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</i></p> <p><i>Note</i></p> <p><i>In the wai ora state:</i></p> <ul style="list-style-type: none"> • <i>Āhua (natural character) is restored to the extent that this is possible, and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character</i> • <i>All freshwater bodies have planted margins.</i> • <i>All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species.</i> • <i>Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga</i> • <i>Mana whenua are able to undertake customary practices at a range of places throughout the catchment.</i> <p>Reasoning: Supports progressive improvement of the health and wai ora of freshwater bodies and the coastal marine area. Considers restoration of natural character in relation to all freshwater bodies and coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure is located over or within freshwater bodies or the coastal marine area. Achieving restoration of natural character implies existing regionally significant infrastructure may need to be removed, and new regionally significant infrastructure may be inappropriate.</p>	<p>Recommendation: Accept in part</p> <p>S42A Reasoning:</p> <p><i>120. I have considered the request of Ara Poutama [S248.008], who sought that the long-term vision objectives for both whaitua be amended to recognise that restoration of natural character may not be possible in relation to RSI. My understanding is the long-term objectives, being those with the 2100 timeline, are mana whenua’s and the community’s overall aspirations for freshwater and coastal health beyond 2040. They are not intended to be achieved by the metrics included in the TAS or coastal objectives, albeit these help. The 2100 goals are very broad and can be expected to involve additional interventions and will take longer to achieve. In addition, the policies and rules are not designed to achieve the 2100 outcomes, rather these are aimed at achieving the 2040 outcomes expressed in other objectives. On this basis, the long-term vision objectives would be a misleading test in respect of resource consent applications for RSI and other activities. I understand they may be useful to guide a subsequent plan response, once the immediate (2040) imperatives are achieved. On this basis, I recommend accepting in part this submission as I have proposed amendments to WH.O1 and P.O1 to make the intent of these objectives clearer to plan users. This alternative relief to the submission of Ara Poutama, means it will not be directly applied to RSI consent applications, nor to other resource consent processes.</i></p> <p><i>153. CFG [S288.038]83 sought clarification of “wai ora state”, requesting a caveat that the natural character clause referred to a water body’s state in response to a variety of input conditions that are managed to achieve a level of naturalness. Similarly, Horokiwi Quarries [S2.016] and Winstone Aggregates [S206.032]84 consider the restoration of Āhua should only occur where natural character has been degraded and Transpower [S177.018] sought the objective acknowledge that complete restoration of character may not be possible in all instances, particularly in relation to RSI. I consider my amendment discussed in paragraph 120 should address the CFG and Transpower points as it clarifies how this objective works, so these submissions should be accepted in part. I agree that Āhua or natural character should only be necessary for achieving wai ora where it is degraded and accordingly I have added wording to WH.O1 (first bullet) and accept this submission. PF Olsen Ltd [S18.017] sought deletion of “natural state” from WH.O1, which is not used here, so I make no recommendation on this submission.</i></p> <p>Recommended amendments: <i>Objective WH.O1</i></p> <p><i>The health of all freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</i></p> <p>Note</p> <p><i>In the wai ora state:</i></p> <ul style="list-style-type: none"> • <i>Āhua (natural character) is restored <u>where deteriorated</u> and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character</i> • <i>All freshwater bodies rivers and lakes have planted margins, <u>where practicable</u></i> • <i>All freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species</i> • <i>Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga</i> • <i>Mana whenua are able to undertake customary practices <u>at a range of places</u> throughout the catchment.</i> 	<p>Transpower supports the recommendation. The relief sought is granted in that bullet point 1 and 2 are amended</p> <p>The recognition of benefits within the recommended new clause is also supported, and gives effect to NPS-FM Policy 15.</p>

Specific plan provision as notified	Sub Point	Submission – Relief sought and reasoning	S42A Report recommendation	Response to S42A recommendation
			<ul style="list-style-type: none"> <i>Water is able to be used for social and economic use benefits, provided that the health and well-being of waterbodies, freshwater ecosystems and coastal waters is not compromised.</i> <i>Note: Objectives WH.O2 to WH.O9 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.</i> 	
Chapter 8: Whaitua Te Whanganui-a-Tara Section 8.2: Policies				
Policy WH.P2 Management of Activities to achieve Target attribute states and coastal water objectives.	S177.020	<p>Amend</p> <p>Relief sought: Amend as follows:</p> <p><i>Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.</i></p> <p><i>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</i></p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and</i></p> <p><i>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</i></p> <p><i>(c) imposing hydrological controls on urban development and stormwater discharges to rivers</i></p> <p><i>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</i></p> <p><i>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</i></p> <p><i>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</i></p> <p><i>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</i></p> <p><i>(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</i></p> <p>Reasoning: Considers policy is inappropriate because definition of “unplanned greenfield development” is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure. Considers prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of “unplanned greenfield development” is granted in full, submitter would adopt a neutral position on this aspect of policy.</p> <p>Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Considers if aquatic offsetting is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6 of NPS-FM, then financial contributions should not be required.</p>	<p>Recommendation: Accept in part</p> <p>S42A Reasoning: 57. Policies WH.P2 and P.P2 are intended set out how activities are to be managed to achieve the TAS and coastal water objectives. The policies link those activities that do not have explicit links to the TAS and coastal water objectives to the achievement of the TAS and coastal water objectives. A number of submissions have been received on these policies including general support, opposition to the direction set in the clauses, and concerns about duplication between clauses and with other policies in PC1.</p> <p>58. I have reviewed these policies in the context of submissions received, the wider plan change and the Operative NRP. I have concluded that the policies are unnecessary and should be deleted on the basis they duplicate other policies or rules and schedules in PC1 or the NRP. In many cases, the nuanced nature of the more detailed policies are not reflected well in the summary policies of WH.P2 and P.P2. Table 1 sets out which provisions the clauses duplicate.</p> <p>60. I acknowledge the wide range of submissions on these policies, seeking specific relief in relation to specific clauses. I do not address these in detail in this report, other than where I have considered a specific response is necessary below under ‘other matters’, given my recommendation is to delete the policies in their entirety. I consider the deletion of the policies will address many of the concerns raised by submitters, or will address their concerns in part, as they relate to this policy. I also note several of these submissions raise matters that will be addressed in subsequent hearing streams, including: • Prohibited activity rules for unplanned greenfield development (Hearing Stream 4 – Stormwater)</p> <p>Recommended amendments: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</p> <p>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</p> <p>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on urban development and stormwater discharges to rivers</p> <p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</p> <p>(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p>	<p>Transpower supports the recommendation to delete P2 noting that the issue of unplanned greenfield development and financial contributions will be addressed at Hearing Stream 4</p>
Chapter 9: Te Awarua-o-Porirua Whaitua Section 9.1: Objectives				

Specific plan provision as notified	Sub Point	Submission – Relief sought and reasoning	S42A Report recommendation	Response to S42A recommendation
<p>Objective P.O1:</p> <p><u>The health of Te Awarua- Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is waiora by 2100.</u></p>	S177.044	<p>Amend</p> <p>Relief sought: Amend objective as follows:</p> <p><i>Objective P.O1</i></p> <p><i>The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.</i></p> <p><i>Note</i></p> <p><i>In the wai ora state:</i></p> <ul style="list-style-type: none"> • <i>Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others</i> • <i>Mauri is restored and waters are in a natural state, <u>to the extent that this is possible.</u></i> • <i>Ecological health is excellent in freshwater and coastal water environments.</i> • <i>Rivers flow naturally, with ripples and the river beds are stony.</i> • <i>Mahinga kai, taonga, mahinga ika and kaimoana species are healthy, abundant, diverse, present across all stages of life, sizeable, and able to be culturally harvested by mana whenua.</i> • <i>Mahinga kai, taonga, mahinga ika and kai moana species are safe to harvest and eat or use, including for mana whenua to exercise manaakitanga</i> • <i>Mana whenua and communities are able to undertake a full range of activities</i> • <i>Mana whenua are able to undertake cultural activities and practices</i> <p>Reasoning: Supports progressive improvement of the health and wai ora of freshwater bodies and the coastal marine area. However, restoration of natural character in relation to all freshwater bodies and coastal marine area is not a reasonably achievable objective where existing regionally significant infrastructure is located over or within freshwater bodies or the coastal marine area. Achieving restoration of natural character implies existing regionally significant infrastructure may need to be removed, and new regionally significant infrastructure may be inappropriate.</p> <p>Considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly as it relates to regionally significant infrastructure. Considers that clause 3.3(2) of NPS-FM requires long-term visions for freshwater to be ambitious but reasonable (that is, difficult to achieve but not impossible), and considers objective needs to be amended to recognise this.</p>	<p>Recommendation: Accept in part</p> <p>S42A Reasoning: <i>167. Several submissions seek the deletion of or amendment to the second bullet point to moderate the 'natural state' outcome for 'waters'. I agree with the PCC submission, that 'natural state' outcome is unrealistic within this highly urban whitua, even over a long period of time. Accordingly, I recommend accepting or accepting in part the submissions which commented on this matter and note the modification to the drafting of this clause in Appendix 4 by adding a caveat of 'where possible' on the basis that it may be possible to achieve this in some parts of the whitua.</i></p> <p>Recommended amendments: <u>Objective P.O1</u></p> <p><u>The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.</u></p> <p><u>Note</u></p> <p><i>In the wai ora state:</i></p> <ul style="list-style-type: none"> • <i>The values of Ngāti Toa Rangatira are upheld by way of revitalising and protecting Ngāti Toa Rangatira practices and tikanga associated with Te Awarua-o-Porirua <u>is a taonga of Ngāti Toa Rangatira and must be respected by others</u></i> • <i>Mauri is restored and waters are in a natural state, <u>where possible</u></i> • <i>Ecological health is excellent in freshwater and coastal water environments</i> • <i>Rivers flow naturally, with <u>ripples riffles, runs and pools,</u> and the river beds are stony</i> • <i>Mahinga kai, taonga, mahinga ika and kaimoana species are healthy, abundant, diverse, present across all stages of life, sizeable, and able to be culturally harvested by mana whenua</i> • <i>Mahinga kai, taonga, mahinga ika and kai moana species are safe to harvest and eat or use, including for mana whenua to exercise manaakitanga</i> • <i>Mana whenua and communities are able to undertake a full range of activities</i> • <i>Mana whenua are able to undertake cultural activities and practices</i> • <i><u>Water is able to be used for social and economic use benefits, provided that the health and well-being of waterbodies, freshwater ecosystems and coastal waters is not compromised.</u></i> <p><i>Note: Objectives P.O2 to P.O6 set out what is needed to achieve progressive implementation of this long-term objective. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.</i></p>	<p>Transpower supports the recommendation. The relief sought is granted in that bullet point 2 is amended</p> <p>The recognition of benefits within the recommended new clause is also supported, and gives effect to NPS-FM Policy 15.</p>
<p>Chapter 9: Te Awarua-o-Porirua Whitua Section 9.2: Policies</p>				
<p>Policy P.P2:</p> <p><u>Management of Activities to achieve Target attribute states and coastal water objectives.</u></p>	S177.046	<p>Amend</p> <p>Relief sought: Amend policy as follows:</p> <p><i>Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives</i></p> <p><i>Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</i></p> <p><i>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the discharge of stormwater contaminants from greenfield development, and where residual adverse effects from the discharge of stormwater contaminants are more than minor, requiring aquatic offsetting or compensation (which may include financial contributions) as to offset adverse effects from residual stormwater contaminants, and</i></p> <p><i>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</i></p> <p><i>(c) imposing hydrological controls on urban development and stormwater discharges to rivers, and</i></p>	<p>Recommendation: Accept in part</p> <p>S42A Reasoning: Refer reasoning for S177.020.</p> <p>Recommended amendments: <u>Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</u></p> <p><u>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</u></p> <p><u>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</u></p> <p><u>(c) imposing hydrological controls on urban development and stormwater discharges to rivers, and</u></p> <p><u>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</u></p>	<p>Transpower supports the recommendation to delete P2 noting that the issue of unplanned greenfield development and financial contributions will be addressed at Hearing Stream 4.</p>

Specific plan provision as notified	Sub Point	Submission – Relief sought and reasoning	S42A Report recommendation	Response to S42A recommendation
		<p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on Freshwater</p> <p>Reasoning: Considers policy is inappropriate because definition of "unplanned greenfield development" is broad, uncertain, and could prohibit maintenance, upgrading and development of regionally significant infrastructure (including the National Grid) and considers that the prohibition on unplanned greenfield development is inappropriate and must be removed. If relief sought by submitter on the definition of "unplanned greenfield development" is granted in full, submitter would adopt a neutral position on this aspect of policy.</p> <p>Considers amendment to policy is necessary to ensure it is consistent with effects management hierarchy set out in NPS-FM. Aquatic offsetting is only necessary where residual adverse effects are more than minor, and resource consent applicants should be encouraged to minimise residual adverse effects so they are no more than minor (in which case aquatic offsetting is not required). Further, if aquatic offsetting is required, financial contributions as proposed by PC1 should be available as a discretionary option for achieving offsetting, but not a mandatory requirement. If applicants can provide alternative effective methods of aquatic offsetting as part of proposal in accordance with Appendix 6.</p>	<p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</p> <p>(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p>	
Chapter 13: Maps				
<p>Map 77: Habitats of nationally threatened freshwater species - Te Awarua-o Porirua and Te Whanganu i-a-Tara (Schedule F1).</p>	S177.079	<p>Amend</p> <p>Relief sought: Amend GIS mapping of riverine environments described in Map 77 to accurately reflect the habitat extents covered by Schedule F1.</p> <p>Reasoning: Considers GIS mapping of riverine habitats described in Map 77 and Schedule F1 does not appear to accurately align with actual river extents. Refers to GIS mapping of riverine habitat adjacent to Pauatahanui Substation. Plan users will rely on the mapping of scheduled riverine habitats to interpret spatial application of Schedule F1. To ensure certainty with respect to application of the rules that relate to scheduled riverine habitats, habitats to which rules apply to should be accurately mapped.</p>	<p>No recommendation</p> <p>S42A Reasoning: 356. In relation to the relief sought by Transpower [S177.079]237 and Ara Poutama [S248.080] to amend the riverine environments in Map 77 to reflect the habitat extents described in Schedule F1, a review of Map 77 by the Council has been requested but at the time of writing this has not been completed. Accordingly, I am unable to provide a recommendation at this point, but I will endeavour to update the Hearing Panels on this matter at the hearing.</p>	<p>Transpower appreciates the officer exploring the matter.</p> <p>It is noted that Schedule F1 and map layer 77 are operative. The issue from Transpower's perspective is that PC1 introduces new rules and policies for these areas. As such the correct identification is relevant and of importance.</p>

Specific plan provision as notified	Sub Point	Submission – Relief sought and reasoning	S42A Report recommendation	Response to S42A recommendation
		 <p data-bbox="486 856 1225 886">Figure 4: Riverine habitat mapping in relation to Pauatahanui substation</p>		