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Proposed District Plan Hearing Panel
Hutt City Council

By Email: Hearing Administrator – Saritha.Shetty@huttcity.govt.nz

Dear Commissioners,

Proposed District Plan – Hearing Stream 9: Designations – Notice of Requirement WRC-12 Belmont Regional Park

Clarus, submitter 474 on the Proposed District Plan, submitted on Wellington Regional Council's Notice of Requirement WRC-12 Belmont Regional Park. Clarus sought that the Gas Transmission Pipeline Corridor be excluded from the designation, or alternatively that conditions be imposed to appropriately recognise and protect the operation, maintenance and development of regionally significant gas transmission infrastructure.

Clarus has reviewed the Section 42A Report and the recommendations relating to Notice of Requirement WRC-12 Belmont Regional Park. Clarus supports the Officer's recommendation that the Notice of Requirement be withdrawn. Clarus does not wish to present additional evidence in support of its submission but will attend the hearing to respond to any questions from Commissioners.

Reasons for Support

Clarus considers Councils' Reporting Officer has appropriately recognised the concerns raised in its submission regarding the broad scope of the proposed designation and its potential implications for regionally significant infrastructure within Belmont Regional Park, including the Firstgas gas transmission network.

In particular, Clarus agrees with the Officer's findings that:

- The proposed designation purpose is broadly enabling and does not relate to a clearly defined project or set of works.
- The designation would apply across a very large area and could enable a wide range of future activities and environmental effects that cannot be adequately assessed at the Notice of Requirement stage.
- The inclusion of activities permitted under future reserve management plans creates uncertainty about the nature and extent of activities that may be undertaken under the designation.
- The proposed conditions do not provide a sufficiently robust framework for managing environmental effects or protecting existing infrastructure and other values within the designation area.
- Recreation, conservation and park management activities are already appropriately provided for through the Proposed District Plan and Operative District Plan, reducing the need for a designation of this scale and scope.

Clarus agrees with the Officer's conclusion that broadly enabling park management activities should not occur within the Gas Transmission Pipeline Corridor without appropriate controls. The Officer expressly recognised the concerns raised by Clarus and supported the primary relief sought.

The Section 42A Report concludes:

> *"I agree with the primary relief requested by Clarus ... I do not consider it appropriate for the broad ranging activities which would be enabled by the WRC-12 designation to occur within Gas Transmission Protection Corridor without control."*

Clarus supports this conclusion.

Clarus considers that the withdrawal of WRC-12 provides greater certainty for the ongoing operation, maintenance and development of regionally significant gas transmission infrastructure, while avoiding potential conflicts arising from an overly broad designation framework.

Conclusion

For the reasons outlined above, Clarus supports the recommendation that Notice of Requirement WRC-12 Belmont Regional Park be withdrawn. This recommendation appropriately addresses the concerns raised in Clarus' submission regarding the protection of regionally significant gas transmission infrastructure and avoids the risks associated with an unnecessarily broad designation.

Yours sincerely,



Pam Unkovich

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