



Submission by Genesis Power Limited

Trading as Genesis Energy

ON

Proposed Regional Policy Statement for the Wellington Region 2009

8 JUNE 2009

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1. Introduction

1. Genesis Power Limited trading as Genesis Energy (“Genesis Energy”) welcomes the opportunity to provide a submission on the Proposed Regional Policy Statement for the Wellington Region 2009.
2. The specific provisions of the proposed Regional Policy Statement that Genesis Energy’s submission relates are shown in bold at the start of each section of this submission.
3. The nature of Genesis Energy’s submission is described under the heading “Reasons for Submission” in each section of the submission.
4. The decisions sought by Genesis Energy are set out under the heading “Relief Sought” in each section of this submission.
5. Genesis Energy wishes to be heard in support of this submission.
6. If others make a similar submission, then Genesis Energy will be prepared to consider presenting a joint case with them during the hearing.

2. Genesis Energy’s Interests

7. Genesis Energy is a State Owned Enterprise, which was formed by the split of the Electricity Corporation of New Zealand (ECNZ) on 1 April 1999.
8. Genesis Energy is involved in the generation and retail of electricity and gas. Genesis Energy operates approximately 2000MW of generation including the Huntly Thermal Power Station, Tongariro Hydro Power Scheme, the Waikaremoana Hydro Scheme, the Kourarau Hydro Scheme and Hau Nui Wind Farm. Genesis Energy is a major electricity and gas retailer in New Zealand with customers primarily located across the North Island.
9. Genesis Energy depends on the utilisation of natural and physical resources (water, land, air and structures) for the generation of hydro, thermal, and wind powered electricity. As such, Genesis Energy depends on and fully supports the sustainable management and efficient use of natural and physical resources as promoted by the Resource Management Act 1991 (“**RMA**”).

10. Genesis Energy's interests in the Proposed Regional Policy Statement are twofold. First it seeks to ensure that appropriate provisions are included to allow for the ongoing operation, maintenance and minor upgrading of its existing electricity generation infrastructure located within the Wellington Region, namely the Hau Nui Wind Farm and the Kourarau Hydro Scheme. Secondly, Genesis Energy seeks to ensure that appropriate provisions are provided to allow for the sustainable management of the renewable energy resources (particularly wind) located within the Region.

3. Genesis Energy's Submission

11. Genesis Energy is generally in support of the policies, objectives and methods contained within the document. However, Genesis Energy proposes some rewording to the infrastructure, heritage, indigenous ecosystems and landscape provisions.
12. Set out below are Genesis Energy's submissions on specific sections of the Proposed Regional Policy Statement.

Energy, Infrastructure and Waste

13. **Objective 9 - Support**

The region's energy needs are met in ways that:

- (a) improve energy efficiency and conservation;*
- (b) diversify the type and scale of renewable energy development;*
- (c) maximise the use of renewable energy resources;*
- (d) reduce dependency on fossil fuels; and*
- (e) reduce greenhouse gas emissions from transportation.*

Reasons For Submission

The provision of a secure energy supply is a fundamental part of sustaining the social, economic and cultural wellbeing of communities and it is important a regional policy statement set a framework that enables this fundamental community need to be met.

Decision Sought

Retain Objective 9.

14. **Objective 10 – Support in Part**

The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.

Reason for Submission

The full and efficient use of regionally significant infrastructure is an important component of sustaining communities' social, economic and cultural wellbeing, and it is important that this infrastructure be recognised and protected. However, the development of new regionally significant infrastructure projects in the region is equally important and should also be provided for. In this regard it is important that the Regional Policy Statement not only recognise and protect, but also "provide for" regionally significant infrastructure.

Decision Sought

Add additional reference to "providing" for regionally significant infrastructure.

The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised, ~~and protected~~ and provided for.

15. **Policy 6: Recognising the benefits from regionally significant infrastructure and renewable energy – regional and district plans – Support in part**

District and regional plans shall include policies that recognise:

- (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure including:
 - (i) people can travel to, from and around the region efficiently;*
 - (ii) public health and safety is maintained through the provision of essential services, supply of potable water and the collection and transfer of sewage;*
 - (iii) people have access to energy so as to meet their needs; and*
 - (iv) people have access to telecommunication services.**

- (b) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:
 - (i) security of supply and diversification of our energy sources;*
 - (ii) reducing dependency on imported energy resources; and*
 - (iii) reducing greenhouse gas emissions**

Reason for Submission

Sustaining the social, economic, cultural and environmental wellbeing of the community is a fundamental component of sustainable management as contemplated by the RMA. Regionally significant infrastructure, and

renewable energy generation infrastructure is an important component of sustaining community wellbeing in this context, and it is important that this be recognised by both the Regional Policy Statement and regional and district plans.

However, the list of regionally significant infrastructure should recognise that local electricity transmission lines and infrastructure is equally as important to the region as the national grid. In this regard it should also recognise that electricity generation facilities that supply electricity directly into the local grid are as important to the region, as those that supply directly to the national grid, and should be provided for in the same manner.

Decision Sought

Amend Policy 6 as follows:

Policy 6: Recognising the benefits from regionally significant infrastructure and renewable energy – regional and district plans – Support in part

....

Regionally significant infrastructure includes:

- pipelines for the distribution or transmission of natural or manufactured gas or petroleum
- strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001
- strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989
- ~~the national electricity grid, as defined by the Electricity Governance Rules 2003~~ the National Grid and electricity distribution and transmission networks defined as the system of transmission lines, subtransmission and distribution feeders (6.6kV and above) and all associated substations and other works to convey electricity
- ~~facilities for the generation and transmission of electricity where it is supplied to the national electricity grid~~ the electricity generated is supplied to the electricity transmission and distribution networks
- the local authority water supply network and water treatment plants
- the local authority wastewater and stormwater networks, systems and wastewater treatment plants
- the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016
- Wellington city bus terminal and Wellington Railway Station terminus
- Wellington International Airport
- Commercial Port Areas within Wellington Harbour (including Miramar, Burnham and Seaview wharves) and adjoining land and storage tanks for bulk liquids.

Essential services include potable water and the collection and transfer of sewage and stormwater.

16. **Policy 7 - Protecting regionally significant infrastructure – regional and district plans – Support in part.**

District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new land uses or activities under, over, or alongside.

Reason for Submission

It is appropriate that the Regional Policy Statement protect regionally significant infrastructure, including electricity generation and transmission infrastructure from incompatible new land uses or activities.

However, the list of regionally significant infrastructure should recognise that local electricity transmission lines and infrastructure are equally as important to the region as the national grid. In this regard it should also recognise that electricity generation facilities that supply electricity directly into the local grid are as important to the region, as those that supply directly to the national grid, and should be provided for in the same manner.

Decision Sought

Amend Policy 7 as follows:

Policy 7 - Protecting regionally significant infrastructure – regional and district plans – Support in part.

...

Regionally significant infrastructure includes:

- pipelines for the distribution or transmission of natural or manufactured gas or petroleum
- strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001
- strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989
- ~~the national electricity grid, as defined by the Electricity Governance Rules 2003~~ the National Grid and electricity distribution and transmission networks defined as the system of transmission lines, subtransmission and distribution feeders (6.6kV and above) and all associated substations and other works to convey electricity
- ~~facilities for the generation and transmission of electricity where it is supplied to the national electricity grid~~ the electricity generated is supplied to the electricity transmission and distribution networks
- the local authority water supply network and water treatment plants
- the local authority wastewater and stormwater networks, systems and wastewater treatment plants
- the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016
- Wellington city bus terminal and Wellington Railway Station terminus
- Wellington International Airport

- Commercial Port Areas within Wellington Harbour (including Miramar, Burnham and Seaview wharves) and adjoining land and storage tanks for bulk liquids.

17. **Policy 10 - Promoting energy efficient design and small scale renewable energy generation – district plans – Support**

District plans shall include policies that:

- promote energy efficient design and the use of small scale renewable energy generation; and*
- provide for energy efficient alterations to existing buildings.*

Reason for Submission

Small scale renewable energy generation and energy efficiency measures will help reduce electricity demand and will compliment new generation facilities.

Decision Sought

Retain Policy 10.

18. **Policy 38 - Recognising the benefits from regionally significant infrastructure and renewable energy – consideration – Support**

When considering an application for a resource consent, notice of requirement or a change, variation or replacement to a district or regional plan, particular regard shall be given to:

- the social, economic, cultural and environmental benefits of regionally significant infrastructure and/or energy generated from renewable energy resources; and*
- the nationally significant wind and marine renewable energy resources within the region and the need for electricity generation facilities to locate where these resources exist.*

Reason for Submission

Sustaining the social, economic, cultural and environmental wellbeing of the community is a fundamental component of sustainable management as contemplated by the RMA. Regionally significant infrastructure, including renewable energy generation infrastructure, is an important component of sustaining community wellbeing in this context. It is important that this be recognised when considering an application for a resource consent, notice of requirement or a change, variation or replacement to a district or regional plan.

Renewable energy generation infrastructure is also subject to stringent locational constraints, in that it has to be located where the natural resource exists. It is also important these locational constraints be given particular regard when considering an application for such infrastructure.

It is also important that the regions yet to be utilised, but highly valued, wind resources be protected from incompatible or inappropriate land uses alongside. In the same manner that the region's significant mineral resources can be "sterilized" by inappropriate development on top of those resources, so can regionally important sites of wind resource. A new policy recognizing this should be included.

Decision Sought

Retain Policy 38 but add a new clause protecting the regions significant, but yet to be developed wind resources. Wording similar to that used in Proposed Policy 60 would be appropriate.

When considering an application for a resource consent, notice of requirement or a change, variation or replacement to a district or regional plan, particular regard shall be given to:

- (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure and/or energy generated from renewable energy resources; ~~and~~*
- (b) the nationally significant wind and marine renewable energy resources within the region and the need for electricity generation facilities to locate where these resources exist; and*
- (c) protecting sites of nationally significant wind renewable energy resource within the region from incompatible or inappropriate land uses alongside.*

Historic Heritage

19. Policy 20: Identifying places, sites and areas with significant historic heritage values – district and regional plans – Oppose in Part.

Regional and district plans shall identify places, sites and areas with significant historic heritage values using the following criteria, and having determined that the place, site or area makes an important contribution to an understanding and appreciation of history and culture under one or more of the criteria:

- (a) Historic values: these relate to the history of a place and how it demonstrates important historical themes, events, people or experiences.*
 - (i) Themes: the place is associated with important themes in history or patterns of development.*
 - (ii) Events: the place has an association with an important event or events in local, regional or national history.*
 - (iii) People: the place is associated with the life or works of an individual, group or organisation that has made a significant contribution to the district, region or nation.*

- (iv) *Social: the place is associated with everyday experiences from the past and contributes to our understanding of the culture and life of the district, region or nation.*
- (b) *Physical values: these values relate to the physical evidence present.*
 - (i) *Archaeological: there is potential for archaeological investigation to contribute new or important information about the human history of the district, region or nation.*
 - (ii) *Architectural: the place is notable for its style, design, form, scale, materials, ornamentation, period, craftsmanship or other architectural values.*
 - (iii) *Technological: the place provides evidence of the history of technological development or demonstrates innovation or important methods of construction or design.*
 - (iv) *Integrity: the significant physical values of the place have been largely unmodified.*
 - (v) *Age: the place is particularly old in the context of human occupation of the Wellington region.*

Reason for Submission

The identification in a consistent manner of significant historic heritage values in the Wellington Region is supported. However, to clarify the intent of the policy, to achieve consistency with wording proposed for Policy 24, and to clarify that all the matters listed under (a) and (b) of Policy 20 should be considered, alternative wording for Policy 20 is suggested.

Decision Sought

Delete Policy 20 or amend as follows:

Policy 20: Identifying places, sites and areas with significant historic heritage values – district and regional plans

Regional and district plans shall identify places, sites and areas with significant historic heritage values, affording consideration to ~~using the following criteria, and having determined that whether~~ the place, site or area makes an important contribution to an understanding and appreciation of history and culture, and the following matters ~~under one or more of the criteria~~:

- (a) *Historic values: these relate to the history of a place and how it demonstrates important historical themes, events, people or experiences.*
 - (i) *Themes: the place is associated with important themes in history or patterns of development.*
 - (ii) *Events: the place has an association with an important event or events in local, regional or national history.*
 - (iii) *People: the place is associated with the life or works of an individual, group or organisation that has made a significant contribution to the district, region or nation.*

- (iv) *Social: the place is associated with everyday experiences from the past and contributes to our understanding of the culture and life of the district, region or nation.*
- (b) *Physical values: these values relate to the physical evidence present.*
 - (i) *Archaeological: there is potential for archaeological investigation to contribute new or important information about the human history of the district, region or nation.*
 - (ii) *Architectural: the place is notable for its style, design, form, scale, materials, ornamentation, period, craftsmanship or other architectural values.*
 - (iii) *Technological: the place provides evidence of the history of technological development or demonstrates innovation or important methods of construction or design.*
 - (iv) *Integrity: the significant physical values of the place have been largely unmodified.*
 - (v) *Age: the place is particularly old in the context of human occupation of the Wellington region.*

Indigenous Ecosystems

20. **Policy 22: Identifying indigenous ecosystems and habitats with significant biodiversity values – district and regional plans – Oppose in part.**

District and regional plans shall identify indigenous ecosystems and habitats with significant indigenous biodiversity values that meet one or more of the following criteria:

- (a) *Representativeness: high representativeness values are given to particular ecosystems and habitats that were once typical and commonplace in a district or in the region, and:*
 - (i) *are no longer commonplace; or*
 - (ii) *are poorly represented in existing protected areas.*
- (b) *Rarity: the ecosystem or habitat has biological physical features that are scarce or threatened in a local, regional or national context. This can include individual species, rare and distinctive biological communities and physical features that are unusual or rare.*
- (c) *Diversity: the ecosystem or habitat has a natural diversity of ecological units, ecosystems, species and physical features within an area.*
- (d) *Ecological context of an area: the ecosystem or habitat:*
 - (i) *enhances connectivity or otherwise buffers representative, rare or diverse indigenous ecosystems and habitats; or*
 - (ii) *provides seasonal or core habitat for threatened indigenous species.*
- (e) *Tangata whenua values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to tangata whenua, identified in accordance with tikanga Maori.*

Reason for Submission

The identification in a consistent manner of significant indigenous ecosystems and habitats in the Wellington Region is supported. However, it is particularly important that the policy criteria be clearly defined and unambiguous. Conversely, the criteria proposed are general, somewhat ambiguous and could result in non-significant sites being deemed significant.

In particular we note:

- References to “commonplace”, “poorly represented” and “scarce or threatened in a local, regional or national context” are vague and should be defined.
- Tangata whenua values are not specifically relevant to ecological significance and are addressed elsewhere in the Plan.
- The long term viability of the site should also be considered when assessing its significance.

Decision Sought

Delete Policy 22 or revise Policy 22 such that it:

- Defines “commonplace”, “poorly represented” and “scarce or threatened in a local, regional or national context”.
- Includes an additional criterion requiring a site to be “positive for sustainability” as defined by Norton and Roper-Lindsay (2004), as well as meeting one of the other criteria to be termed “significant”.
- Does not refer to Tangata whenua values

Landscape

21. Policy 24: Identifying outstanding natural features and landscapes – district and regional plans - Oppose

District and regional plans shall identify outstanding natural features and landscapes using the following criteria, and having determined that the natural feature or landscape is exceptional or out of the ordinary under one or more of the criteria and the natural components dominate over the influence of human activity:

- (a) Natural science values: these values relate to the geological, ecological, topographical and natural process components of the natural feature or landscape:*
 - (i) Representativeness: the combination of natural components that form the feature or landscape strongly typifies the character of an area.*

- (ii) *Research and education: all or parts of the feature or landscape are important for natural science research and education.*
- (iii) *Rarity: the feature or landscape is unique or rare within the district or region, and few comparable examples exist.*
- (iv) *Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.*
- (b) *Aesthetic values: these values relate to scenic perceptions of the feature or landscape:*
 - (i) *Coherence: the patterns of land cover and land use are in harmony with the underlying natural pattern of landform and there are no significant discordant elements of land cover or land use.*
 - (ii) *Vividness: the feature or landscape is visually striking and is widely recognised within the local and wider community for its memorable and sometimes iconic qualities.*
 - (iii) *Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and land cover appear to be largely the result of intact and healthy natural systems.*
- (c) *Expressiveness (legibility): the feature or landscape clearly shows the formative natural processes and/or historic influences that led to its existing character.*
- (d) *Transient values: the consistent and noticeable occurrence of transient natural events, such as seasonal change in vegetation or in wildlife movement, contributes to the character of the feature or landscape.*
- (e) *Shared and recognised values: the feature or landscape is widely known and is highly valued for its contribution to local identity within the immediate and wider community.*
- (f) *Tangata whenua values: Maori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.*
- (g) *Historical associations: knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape.*

Reason for Submission

Policy 24 as drafted contains convoluted wording and is not consistent with the RMA or case law with respect to identifying outstanding natural landscapes. The matters referred to as “criteria” are recognised matters that should be considered in assessing the significance of a landscape, rather than each individual matter acting as a “threshold test” in determining outstanding natural landscape per se. Being exceptional or out of the ordinary under one of the matters referred to as “criteria” does not qualify a landscape as outstanding.

Decision Sought

Delete Policy 24 or alternatively amend Policy 24 as follows:

Policy 24: Identifying outstanding natural features and landscapes – district and regional plans

District and regional plans shall identify outstanding natural features and landscapes using the following criteria, and having determined that the natural feature or landscape is exceptional or out of the ordinary under one or more of the criteria and the affording consideration to whether natural components dominate over the influence of human activity, and to the following matters:

- (a) Natural science values: these values relate to the geological, ecological, topographical and natural process components of the natural feature or landscape:
 - (i) Representativeness: the combination of natural components that form the feature or landscape strongly typifies the character of an area.*
 - (ii) Research and education: all or parts of the feature or landscape are important for natural science research and education.*
 - (iii) Rarity: the feature or landscape is unique or rare within the district or region, and few comparable examples exist.*
 - (iv) Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.**
- (b) Aesthetic values: these values relate to scenic perceptions of the feature or landscape:
 - (i) Coherence: the patterns of land cover and land use are in harmony with the underlying natural pattern of landform and there are no significant discordant elements of land cover or land use.*
 - (ii) Vividness: the feature or landscape is visually striking and is widely recognised within the local and wider community for its memorable and sometimes iconic qualities.*
 - (iii) Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and land cover appear to be largely the result of intact and healthy natural systems.**
- (c) Expressiveness (legibility): the feature or landscape clearly shows the formative natural processes and/or historic influences that led to its existing character.*
- (d) Transient values: the consistent and noticeable occurrence of transient natural events, such as seasonal change in vegetation or in wildlife movement, contributes to the character of the feature or landscape.*
- (e) Shared and recognised values: the feature or landscape is widely known and is highly valued for its contribution to local identity within the immediate and wider community.*
- (f) Tangata whenua values: Maori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.*
- (g) Historical associations: knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape.*

22. Policy 26: Identifying significant amenity landscape values – district and regional plans – Oppose

District and regional plans shall identify significant amenity landscapes using the following criteria and having determined the landscape has important landscape value under one or more of the criteria:

- (a) Natural science values: these values relate to the geological, ecological, topographical and natural process components of the natural feature or landscape:
 - (i) Representativeness: the combination of natural components that form the feature or landscape strongly typifies the character of an area.*
 - (ii) Research and education: all or parts of the feature or landscape are important for natural science research and education.*
 - (iii) Rarity: the feature or landscape is unique or rare within the district or region, and few comparable examples exist.*
 - (iv) Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.**
- (b) Aesthetic values: these values relate to scenic perceptions of the feature or landscape:
 - (i) Coherence: the patterns of land cover and land use are in harmony with the underlying natural pattern of landform and there are no significant discordant elements of land cover or land use.*
 - (ii) Vividness: the feature or landscape is visually striking and is widely recognised within the local and wider community for its memorable and sometimes iconic qualities.*
 - (iii) Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and land cover appear to be largely the result of intact and healthy natural systems.**
- (c) Expressiveness (legibility): the feature or landscape clearly shows the formative natural processes and/or historic influences that led to its existing character.*
- (d) Transient values: the consistent and noticeable occurrence of transient natural events, such as seasonal change in vegetation or in wildlife movement, contributes to the character of the feature or landscape.*
- (e) Shared and recognised values: the feature or landscape is widely known and is highly valued for its contribution to local identity within the immediate and wider community.*
- (f) Tangata whenua values: Maori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.*
- (g) Historical associations: knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape.*

Reason for Submission

See Policy 24 (paragraph 21).

Decision Sought

Delete Policy 26 or amend Policy 26 as follows (or similar):

Policy 26: Identifying significant amenity landscape values – district and regional plans

District and regional plans shall identify significant amenity landscapes taking into consideration the following matters ~~using the following criteria and having determined the landscape has important landscape value under one or more of the criteria:~~

- (a) *Natural science values: these values relate to the geological, ecological, topographical and natural process components of the natural feature or landscape:*
 - (i) *Representativeness: the combination of natural components that form the feature or landscape strongly typifies the character of an area.*
 - (ii) *Research and education: all or parts of the feature or landscape are important for natural science research and education.*
 - (iii) *Rarity: the feature or landscape is unique or rare within the district or region, and few comparable examples exist.*
 - (iv) *Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.*
- (b) *Aesthetic values: these values relate to scenic perceptions of the feature or landscape:*
 - (i) *Coherence: the patterns of land cover and land use are in harmony with the underlying natural pattern of landform and there are no significant discordant elements of land cover or land use.*
 - (ii) *Vividness: the feature or landscape is visually striking and is widely recognised within the local and wider community for its memorable and sometimes iconic qualities.*
 - (iii) *Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and land cover appear to be largely the result of intact and healthy natural systems.*
- (c) *Expressiveness (legibility): the feature or landscape clearly shows the formative natural processes and/or historic influences that led to its existing character.*
- (d) *Transient values: the consistent and noticeable occurrence of transient natural events, such as seasonal change in vegetation or in wildlife movement, contributes to the character of the feature or landscape.*
- (e) *Shared and recognised values: the feature or landscape is widely known and is highly valued for its contribution to local identity within the immediate and wider community.*
- (f) *Tangata whenua values: Maori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.*
- (g) *Historical associations: knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape.*

Regional Form

23. **Objective 21 – Support in Part**

A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and:

- (a) a viable and vibrant regional central business district in Wellington city;*
- (b) an increased range and diversity of activities in and around the regionally significant centres;*
- (c) sufficient industrial-based employment locations or capacity to meet the region's needs;*
- (d) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;*
- (e) strategically planned rural development;*
- (f) a range of housing (including affordable housing);*
- (g) integrated public open spaces;*
- (h) integrated land use and transportation;*
- (i) improved east-west transport linkages; and*
- (j) efficient use of existing infrastructure (including transport network infrastructure).*

Reason for Submission

Genesis Energy also notes that in relation to regional land transport matters, the Regional Council has an important role to play in ensuring that corridors are available throughout the region for the transportation of over dimension loads. The requirements in this regard can involve, for example, new generation equipment, other industrial plant, or transportation of equipment for maintenance of existing infrastructure. These loads can exceed "normal" road transport loads, with weights in excess of 500 tonnes (for some generation equipment) and / or lengths of 30 – 45 metres (such as wind farm equipment). It is essential for new infrastructure development (and in many cases, for new industry) that routes are available to transport these types of load.

Genesis Energy considers that the Council should recognise the importance of providing key strategic routes through the region for the transportation of such loads as a matter of regional and national significance to support the social and economic development of the region. It is noted that over- and under- passes, bridges, and other carriageway constraints potentially limit the transportation of such loads.

Decision Sought

Amend Objective 21 as follows (or similar):

Objective 21

A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and:

- (a) a viable and vibrant regional central business district in Wellington city;*

- (b) *an increased range and diversity of activities in and around the regionally significant centres;*
- (c) *sufficient industrial-based employment locations or capacity to meet the region's needs;*
- (d) *urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;*
- (e) *strategically planned rural development;*
- (f) *a range of housing (including affordable housing);*
- (g) *integrated public open spaces;*
- (h) *integrated land use and transportation;*
- (i) *improved east-west transport linkages; ~~and~~*
- (j) *efficient use of existing infrastructure (including transport network infrastructure); and*
- (k) *strategically planned corridors for the transportation of over dimension loads.*

24. **Policy 56: Integrating land use and transportation – consideration: Support in Part**

When considering an application for a resource consent, notice of requirement, or a change, variation or replacement to a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:

- (a) *whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;*
- (b) *connectivity with, or provision of access to, public services or activities, open spaces or recreational areas;*
- (c) *whether there is good access to the strategic public transport network;*
- (d) *provision of safe and attractive environments for walking and cycling; and*
- (e) *minimising the demands for new, or upgrades to existing, transport network infrastructure.*

Reason for Submission

Genesis Energy agrees in principle with the intent of the policy. However clause (e) should recognise that in some cases new subdivision or development may require new, or upgrades to existing, transport or network infrastructure. Rather than seeking to “minimise” those new, or upgrades to existing transport or network infrastructure, it is more appropriate that the policy require the new subdivision or development properly account for them.

Decision Sought

Retain Policy 56 but amend the wording of clause (e) as follows:

Policy 56: Integrating land use and transportation – consideration

When considering an application for a resource consent, notice of requirement, or a change, variation or replacement to a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:

- (a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;*
- (b) connectivity with, or provision of access to, public services or activities, open spaces or recreational areas;*
- (c) whether there is good access to the strategic public transport network;*
- (d) provision of safe and attractive environments for walking and cycling; and*
- (e) minimising the demands for whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.*

25. Appendix 1 – Table 15 Rivers and lakes with significant amenity and recreation values (relates to Policies 17, 42 and 52. – Oppose in Part.

Reason for Submission

The primary purpose of the Kourarau Dam is the generation of electricity, and it is important that this purpose takes precedence over the other incidental recreational uses its construction has facilitated. As such, it should be removed from Table 15.

Decision Sought

Delete the row addressing Kourarau Dam and Gladstone from Table 15.

26. Appendix 1 – Table 16 Rivers and lakes with significant indigenous ecosystems (relates to Policies 17, 23 and 42) – Oppose.

Reason for Submission

There is ambiguity as to the relationship between the significant indigenous ecosystems listed in Table 16, and the criteria stipulated in Policy 22 for determining ecosystems with significant biodiversity values. Notwithstanding this, given Policy 22 directs regional and district plans to identify ecosystems and habitats with significant biodiversity values the merits of Table 16 are debatable and it should be deleted.

Decision Sought

Delete Table 16.