

Form 6  
Further submission in support of, or in opposition to, submission on publicly  
notified proposed policy statement or plan

*Clause 8 of First Schedule, Resource Management Act 1991*

**To** Greater Wellington Regional Council

Name of person making further submission: Wellington Electricity Lines Limited

This is a further submission in support of (*or* in opposition to) a submission on the following proposed plan:

Proposed Natural Resources Plan for the Wellington Region

I support *or* oppose the submission of:

The submitters identified in the attached table

The particular parts of the submission I support *or* oppose are:

Indicated in the attached table

The reasons for my support *or* opposition are:

Indicated in the attached table

I seek the following decision from the local authority:

Indicated in the attached table



Signature of person making further submission  
(or person authorised to sign on behalf of  
person making further submission)

Date 28/03/2016

|   |  |
|---|--|
| Address for service of person<br>making further submission: | Edison Consulting Group<br>PO Box 875<br>Hamilton 3240 |
| Telephone:  | 021 993 223  |
| Fax/email:  | tim.lester@edison.co.nz                                |
| Contact person:   | Tim Lester   |

**Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

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**Further Submission by Wellington Electricity Lines Limited (WELL) on the Proposed Natural Resources Plan for the Wellington Region**


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*Original Submitters:* S14 (Egon Guttke); S29 (Powerco); S75 (Minister of Conservation); S82 (Meridian Energy Ltd); S98 (Spark NZ Trading Ltd); S140 (Kiwirail Holdings Ltd); S144 (Chorus NZ Ltd); S145 (Vector Gas Ltd); S152 (Waa Rata Estate); S163 (Porirua City Council); S165 (Transpower NZ Ltd); S175 (J Allin & R Crozier); S279 (Rangitane o Wairarapa Inc); S282 (Wellington International Airport Ltd); S353 (Royal Forest and Bird Protection Society);

| Submitter   | Matter / Number | Provision                     | Support or Oppose | Reason for Further Submission  | Decision Sought   |
|-------------|-----------------|-------------------------------|-------------------|--|---|
| Egon Guttke | Definitions     | S14/007<br>Erosion Prone Land | Support           | WELL agree with the submission point as it reflects the intent of WELL's original submission point on the matter in that the proposed definition for erosion prone land should be consistent with the Regional Soil Plan.  | Accept submission and amend definition as sought.   |
| Powerco     | Objectives      | S29/001<br>Objective O12      | Support           | WELL agree with the submitter that O12 adequately recognises the social, economic, cultural and environmental benefits of Regionally Significant Infrastructure.   | Accept the submission and retain O12.   |
|             |                 | S29/002<br>Objective O13      | Support in part   | WELL agree with the submitter that O13 adequately recognises Regionally Significant Infrastructure and assists in protecting such infrastructure from issues of reverse sensitivity in the coastal marine area. However, WELL considers that such recognition and protection should be expanded to cover all other sensitive environments in the region – not just the coastal marine environment. | Amend O13 as appropriate to include the use and ongoing operation of Regionally Significant Infrastructure in all sensitive environments. |

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|-----------|-----------------|--------------------------|-------------------|---|--|
|           |                 | S29/004<br>Objective O22 | Support in part   | WELL agree with the submission point that appropriate recognition for hard engineering mitigation is provided in the NRP.<br><br>As currently worded O22 is too dismissive of hard engineering options and fails to recognise instances where such engineering options hold long-term environmental advantages over softer engineering solutions. | Council amend O22 as sought by the submission point. Alternatively, O122 is deleted. |
|           |                 | S29/012<br>Objective O53 |                   | WELL support this submission point as O53 suitably provides the foundation for the NRP policy framework associated with use and development in the coastal marine environment - as well as functional need.   | Council accept the submission point and retain O53 as sought by the submitter.       |
|           | Policies        | S29/017<br>Policy 14     | Support           | WELL agree with the submitter that Policy 14 be expanded to clearly include avoidance of all adverse effects, not only reverse sensitivity effects.   | Accept the amendments sought by the submitter for P14                                |
|           |                 | S29/035<br>Policy 132    | Support           | WELL agree with the submitter that P132 adequately recognises <i>functional need</i> of Regionally Significant Infrastructure in the coastal marine area.   | Accept the submission and retain P132.   |
|           |                 | S29/036<br>Policy 138    | Support           | WELL agree with the submitter that P138 appropriately provides for regionally significant infrastructure development and operation within sites with significant values   | Accept the submission and retain P138  |

| Submitter | Matter / Number | Provision                | Support or Oppose | Reason for Further Submission  | Decision Sought  |
|-----------|-----------------|--------------------------|-------------------|--|--|
|           |                 | S29/037<br>Policy 139    | Support           | WELL agree with the submitter that P139 appropriately recognises suitable mitigation options for Regionally Significant Infrastructure in the event of sea-level rise.   | Council accepts the submission point and retains P139 unaltered.   |
|           | Rules           | S29/039<br>Rule 12       | Support in part   | WELL agree with the submitter to the extent that it is not realistic to seek resource consent in the event of an emergency power situation.<br><br>However, as indicated in WELL's original submission point on R12, the permitted activity rule should also cover generation required for planned outages (often a pre-emptive step so as to avoid emergency events). | Accept the intent of submission: however, R12 to be amended to allow for generator use for planned outages.  |
|           |                 | S29/045<br>Rule 112      | Support           | WELL agree with the submitter as the proposed rule adequately allows for repair and maintenance activities for infrastructure located within wetlands lakes and rivers. The submission reflects WELL's support for the rule to be unaltered in their original submission.  | Accept the submission and retain R112 unaltered.   |
|           |                 | S29/052<br>New Rule 146A | Support           | Similar to the submitter, WELL undertake activities commonly associated with the undergrounding of network utility infrastructure. WELL consider that having a permitted activity rule for temporary groundwater diversion devices (well pointing) would be appropriate in the NRP given that the term 'earthworks' does not include electricity lines.                | Accept the submission to include a new Rule 146A permitting the temporary use of well pointing to dewater areas undergoing trenching works associated with underground network utility infrastructure. |

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|-----------|-----------------|--|-------------------|---|---|
|           |                 | S29/054<br>Rule 149                              | Support           | WELL agree with the submitter that R149 should be clarified to explicitly provide for structures co-located with utility services (i.e, an electrical cable which is attached to the underside of a bridge).  | Accept the submission and amend R149 as sought.   |
|           | Definitions     | S29/060<br>Regionally Significant Infrastructure | Support           | <p>WELL agree with the submitter that the definition for Regionally Significant Infrastructure as proposed in the NRP is “unclear”, or ambiguous, in regard to its coverage of the electricity distribution network.</p> <p>As WELL shares similar functions as the submitter’s electricity distribution operations, it is considered important that such functions are appropriately identified and provided for in the Proposed NRP.</p> <p>Whilst there is some variance in the submitters sought amendments to the definition of Regionally Significant Infrastructure from that of WELL; it is considered that the intent of the submission (clarification that the electricity distribution network in the Wellington Region) reflects that of WELL’s submission – and therefore is appropriate to garner support from WELL.</p> <p>WELL also support the submission that, in the event Council fail to appropriately amend the definition to more explicitly include electricity distribution, additional and far reaching policy frameworks are to be included in the Proposed NRP to ensure critical elements of the regions electricity distribution network are adequately provided for and protected.</p> | That Council accept the intent of the submission and clarify the definition of Regionally Significant Infrastructure in the Proposed NRP to the extent that electricity distribution networks are unambiguously included. |

| Submitter             | Matter / Number | Provision  | Support or Oppose | Reason for Further Submission   | Decision Sought  |
|-----------------------|-----------------|--|-------------------|---|--|
|                       |                 | S29/062<br>Bore                                  | Support           | WELL support the submitter's proposed new rule R146A; consequently, WELL support the consequential amendment to the definition of 'Bore' as sought.   | Accept the submission and amend the definition for 'Bore' as sought by the submitter.  |
|                       |                 | S29/064<br>Earthworks                            | Support           | WELL support the unaltered retention of the definition for Earthworks as sought by the submitter because it reflects WELL's original submission point in support of the definition.   | Accept the submission and retain the definition for Earthworks unaltered.  |
| Minister Conservation | Rules           | S75/155<br>Rule 122                              | Oppose            | WELL oppose the submission seeking to disallow vegetation clearance during migration times for particular species.<br><br>While it is noted that there may be ecological benefits for such exclusions - in the event that urgent vegetation management is required relating to electricity supply, WELL consider that there should be no impediment to when vegetation clearance can occur. | Council reject the submission point; or alternatively, the submission point is rejected in part and amends the proposed rule so as not to prevent the clearance of vegetation associated with the maintenance and operation of electricity infrastructure. |
|                       |                 | S75/176<br>Rule R197                             | Support           | WELL agree with the <i>intent</i> of the submitter that non-emergency motor vehicle use on the foreshore should be permitted if there is a public good need.  | Accept the submission and amend the R197 as sought by the submitter.   |
| Meridian Energy Ltd   | Definitions     | S82/004<br>Regionally Significant Infrastructure | Oppose            | WELL disagrees with retaining the definition of 'regionally significant infrastructure' as it refers to "facilities for the generation and transmission of electricity where it is supplied <b>to</b> the electricity distribution network" and this is ambiguous as to whether it includes or excludes the distribution network.   | Council not accept the submission, but rather accept those submissions calling for a clearer and less ambiguous definition with regards to electrical distribution networks.   |

| Submitter | Matter / Number | Provision   | Support or Oppose | Reason for Further Submission  | Decision Sought   |
|-----------|-----------------|---|-------------------|--|---|
|           |                 | S82/005<br>Renewable energy generation activities | Support in part   | WELL support the submission to amend the definition as it is appropriate to clarify that access tracks (or access to the facilities for construction, operation and maintenance) are a component of renewable energy generation activities.          | Accept the submission and amend the definition for Renewable energy generation activities as sought by the submitter. |
|           |                 | S82/007<br>Upgrade                                | Support           | WELL support the submission because the proposed amendments to the Upgrade definition provides a more accurate scope of works that can be undertaken on existing structures or facilities above and beyond the unspecified term 'current standards'. | Accept the submission and amend the definition for Upgrade as sought by the submitter.                                |
|           | Objectives      | S82/009<br>Objective O13                          | Support           | WELL support the submission in that protection of regionally significant infrastructure should be applied at a region wide scale, and not be limited to the coastal marine area.   | Accept the submission and amend Objective O13 as sought by the submitter.   |
|           | Policies        | S82/015<br>Policy P14                             | Support           | WELL consider that the submission to reference 'new' incompatible use and development is sensible and appropriate for the effective operation of the NRP.  | Accept the submission and amend Policy P14 as sought by the submitter.  |
|           |                 | S82/025<br>Policy P138                            | Support           | WELL agree with the submission point as it reflects the original submission point from WELL that P138 be retained unaltered.   | Council accept the submission point and retain P138 unaltered.  |



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|----------------------|-----------------|-----------------------|-------------------|--|---|
| Spark NZ Trading Ltd | Policies        | S98/010<br>Policy P9  | Support           | WELL support this submission because it correctly notes that in some temporary instances, public access may be restricted in order to protect Regionally Significant Infrastructure (i.e., during maintenance or upgrading activities).  | Accept the submission and amend Policy P9 as sought by the submitter.                     |
|                      |                 | S98/011<br>Policy P12 | Support           | WELL support this submission as it will provide greater certainty to plan users in regard to the <i>functional need</i> for regionally significant infrastructure, including where it is required to be located within sensitive environments as noted in the submission.                                  | Accept the submission and amend Policy P12 as sought by the submitter.                    |
|                      |                 | S98/013<br>Policy P14 |                   | WELL agree with the submission point in that effects above and beyond reverse sensitivity effects need to be appropriately recognised within the proposed NRP policy framework.  | Council accept the submission point and consequently amend proposed Policy P14 as sought. |
|                      | Rules           | S98/021<br>Rule R54   | Support           | WELL support the submission because it correctly notes that there needs to be consistency between the NRP and the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.<br><br>As currently drafted, the proposed NRP rules are considered by WELL to be more onerous than the NES. | Council accept the submissions amendments to proposed Rule R54.                           |

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|                       |                     | S98/030<br>Rule R162            | Support           | WELL agree with the submission point in that it inappropriate for additions and alterations to existing structures to attract a non-complying activity status. WELL consider it is appropriate for <i>new</i> structures only in the coastal marine environment to be non-complying activities.   | Council accept the submission point and amend R162 as sought.   |
| Kiwirail Holdings Ltd | Submission Point 8  | S140/?<br>Definition for Offset | Support           | WELL agree with the submission point that the ability for linear infrastructure providers to have the ability to offset effects – and the use of offsets be limited to satisfy RMA requirements of remedying or mitigating adverse environmental impacts.   | Council accept the submission point 8 and retain the definition for Offset in the Proposed NRP unaltered. |
| Chorus NZ Ltd         | Submission point 10 | S144/010<br>Policy P9           | Support           | WELL agree with the submission point that in some instances public access to coast or marine areas should be restricted in the event health and safety could be compromised during the construction or maintenance of regionally significant infrastructure.  | Council accept the submission point 10 and consequently amend proposed Policy 9 as sought.                |
|                       | Submission Point 11 | S144/011<br>Policy P12          | Support           | WELL contend that, as currently worded, Policy P12 does not adequately acknowledge the <i>functional need</i> of all regionally significant infrastructure to be located within not only the coastal marine area, but also in other significant or character areas. Consequently, WELL agree with the submission point and consider that the sought amendment is appropriate. | Council accept the submission point 11 and consequently amend proposed Policy P12 as sought.              |
|                       | Submission Point 12 | S144/012<br>Policy P13          | Support           | WELL agree with the submission point that removal of regionally significant infrastructure should be explicitly included within proposed Policy 13 of the NRP.  | Council accept the submission point 12 and consequently amend proposed Policy P13 as sought.              |

| Submitter      | Matter / Number     | Provision  | Support or Oppose | Reason for Further Submission   | Decision Sought   |
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|                | Submission Point 13 | S144/013<br>Policy P14                             | Support           | WELL agree with the submission point in that effects above and beyond reverse sensitivity effects need to be appropriately recognised within the proposed NRP policy framework.   | Council accept the submission point 13 and consequently amend proposed Policy P14 as sought.                    |
|                | Submission Point 14 | S144/014<br>Policy P24                             | Support           | WELL agree with the submission point in that Policy 24 requires amendment to reflect Section 5(2)(c) of the RMA – avoid, remedy or mitigate adverse effects.  | Council accept the submission point 14 and consequently amend proposed Policy P24 as sought.                    |
|                | Submission Point 15 | S144/015<br>Policy 25                              | Support           | WELL support the submission point for the same reason as the previous submission point above was supported (to appropriately reflect the purpose of the RMA)  | Council accept the submission point 15 and consequently amend proposed Policy P25 as sought.                    |
| Vector Gas Ltd | Objectives          | S145/021<br>O22                                    | Support           | WELL agree with the submission point that appropriate recognition for hard engineering mitigation is provided in the NRP.<br><br>As worded O22 is too dismissive of hard engineering options and fails to recognise instances where such engineering options hold long-term advantages over softer engineering solutions. | Council accept the submission point and consequently delete proposed O22 as sought, or alternatively amend O22. |
|                | Policies            | S145/027<br>New Policy:<br>Duration of<br>Consents | Support           | WELL consider it appropriate that activities associated with regionally significant infrastructure be eligible for the maximum consent period available under the RMA. Consequently, WELL agree with the submission point.  | Council include a new policy in the Proposed NRP as sought by the submitter                                     |

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|                      |                 | S145/028<br>Policy P12    | Support           | WELL support the submission point as it appropriately amends the policy to acknowledge the investment in regionally significant infrastructure, as well as recognising that not only port activities have a functional need in the coastal and marine area.  | Council accept the submission point and amend Policy as sought     |
|                      |                 | S145/029<br>Policy 13     | Support           | WELL support the submission point as it will provide clarity as to the type of works undertaken by network utility operations. The submission also correctly acknowledges that the policy should be applicable to 'new' infrastructure.  | Council accept the submission point and amend Policy 13 as sought. |
| Waa Rata Estate      | Rules           | S152/082<br>Rule R122     | Oppose            | The submission seeks to amend conditions f, g, l and m of Rule R122, and replace them with a requirement for a 'workshop' attendance for people undertaking such works<br><br>WELL do not agree with the submission point and consider the permitted activity rule conditions clearly communicate to plan uses the rule's expectations for vegetation removal. | Council reject the submissions sought amendments to Rule R122      |
| Porirua City Council | Objectives      | S163/039<br>Objective O13 | Support           | WELL support the submission to the extent that it recognises that regionally significant infrastructure requires protection not only in the coastal marine environment, but also in wetlands and the beds of lakes and rivers.   | Council accept the amendments sought by the submission point.      |

| Submitter         | Matter / Number     | Provision             | Support or Oppose | Reason for Further Submission  | Decision Sought  |
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|                   | Rules               | S163/115<br>Rule R104 | Support in part   | WELL support the submission point to the extent that it recognises that some structures in wetlands cannot be effectively maintained without the involvement of equipment that is not hand held. Furthermore, WELL support the submission in that, as currently drafted, Rule R104 is unduly restrictive given the functional need infrastructure has in being located within wetlands.  | Council accept the submission point in principle – however, any amendment to condition f should relate to all infrastructure asset owners with structures located within wetlands, not just local authorities. |
| Transpower NZ Ltd | Submission point 11 | S165/008<br>Policy 12 | Oppose            | <p>The submission point seeks amendments to the policy that elevate the importance of the National Grid above other regionally significant infrastructure in the region (i.e., use of the words “... <i>particularly the national grid</i>”).</p> <p>WELL consider that the NRP should not categorise or treat differently network utility operators that are defined Regionally Significant Infrastructure.</p> <p>Differentiating components of regionally significant infrastructure, to the level inferred by the submission point, has the potential to create confusion to plan users, and furthermore, could set environmental precedents for other network utility operators with similar environmental effects.</p> | Council reject the submission’s sought amendments to Policy P12  |

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|-----------|---------------------|----------------------------|-------------------|--|--|
|           | Submission point 13 | S165/010<br>New Policy 13A | Oppose            | <p>WELL consider that the coverage and application of all policies relating to regionally significant infrastructure remain as consistent as practicably possible in the NRP.</p> <p>The submission point seeks to introduce a new policy into the NRP with applicability solely to the National Grid. WELL does not consider it appropriate that an isolated component of defined <i>Regionally Significant Infrastructure</i> is given special or unique consideration in a regional context under the NRP when it can be reasonably argued that all regionally significant infrastructure should be subject to consistent policy framework.</p> <p>Any specific emphasis on the National Grid is appropriate for a national planning instrument (i.e., NPS, NESETA), whereas this NRP needs to maintain a focus for Wellington at the regional scale; hence, all levels of electrical infrastructure (from generation through transmission and including distribution) should have equal emphasis and importance.</p> | Council reject the submission's proposed new Policy P13A.    |
|           | Submission point 14 | S165/011<br>Policy 14      | Support           | WELL support the submission's proposed amendments to Policy P14 as they provide appropriate clarity and coverage in regard to protection of regionally significant infrastructure.   | Council accept the submission to amend Policy P14 as sought. |

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|---------------------|---------------------|-----------------------|-------------------|--|---|
|                     | Submission point 65 | S165/053<br>Rule 104  | Oppose            | <p>WELL consider that the proposed amendments to Rule 104(b) will undermine the ability for other linear infrastructure network utility operators' to undertake critical maintenance activities on structures located in wetlands.</p> <p>The submission seeks to restructure and amend Rule R104 to such an extent that only hunting / recreational and National Grid activities are explicitly identified as being permitted activities pursuant to Rule R104.</p> <p>WELL consider that such an amendment is inappropriate as it will diminish Rule R104 applicability to other infrastructure providers that have to locate structures within wetlands due to functional need.</p> | Council reject the submission's proposed amendments to Rule 104.  |
| J Allin & R Crozier | Policies            | S175/032<br>Policy P8 | Support           | WELL support the submission point to the extent it seeks clarification of what type of work can be undertaken on structures within the coastal marine environment. WELL's submission sought the inclusion of the word 'maintenance' in the Policy P8 activity list – and furthermore that the word maintenance is defined in the NRP.  | Council accept the intent of the submission point and include clarification to Policy P8 activities to include upgrading, or alternatively define the word 'maintenance'. |

| Submitter                 | Matter / Number | Provision                 | Support or Oppose | Reason for Further Submission   | Decision Sought                         |
|---------------------------|-----------------|---------------------------|-------------------|---|---|
| Rangitane o Wairarapa Inc | Objectives      | S279/024<br>Objective O13 | Oppose            | <p>WELL consider that Objective O13 infers that existing and new regionally significant infrastructure is to be protected. To clarify this point, WELL submitted that the word 'development' be included in O13 in their original submission.</p> <p>WELL do not agree with the submission point as it seeks to lessen the objective's coverage in regard to future regionally significant infrastructure being developed in the coastal marine environment because of a functional need.</p> | Council reject the submission point.    |
|                           | Policies        | S279/075<br>Policy P8     | Oppose            | WELL do not agree with the submission point to limit the effectiveness of Policy P8 on <i>lawfully established structures</i> in the coastal marine environment, nor to limit the type of structures or activities with the coastal marine area through the proposed removal of clause (h) and (k).   | Council to reject the submission point. |



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|-----------|-----------------|--|-------------------|---|--|
|           |                 | S279/079<br>S279/080<br>S279/081<br>Policies 12-14 | Oppose            | <p>WELL do not agree with the submission point in regard to more specific direction/regulation being in the NRP for regionally significant infrastructure and the management of effects.</p> <p>The consent process contained within District and or City Plans is the appropriate mechanism to regulate specific or technical parameters of network utility infrastructure (height, setback, noise etc.).</p> <p>The emphasis of the Natural Resource Plan must be focused on the management of natural environments in the region; the submission point seeks to inappropriately introduce a 'doubling up' of assessment which in effect will pass on additional costs and time delays for network utility operators.</p> | Council reject the submission points.  |
|           |                 | S279/157<br>Policy P132                            | Oppose            | <p>WELL does not agree with the submission point as it seeks the avoidance of regionally significant infrastructure in areas of outstanding natural character.</p> <p>WELL contend that development within natural character areas will not occur unless such development has no alternative, or otherwise has a functional need.</p> <p>The submission point seeks to prohibit development in high and or outstanding natural character areas. Such prohibition runs contrary to the purpose of the RMA in regard to the sustainable management of physical resources.</p>   | Council to reject the submission point |

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|           |                 | S279/160<br>Policy 138  | Oppose            | <p>Through the use of the word ‘avoid’ the submission seeks to prohibit the development and operation of regionally significant infrastructure in sites with significant values unless adverse effects are avoided.</p> <p>As not all adverse effects associated with regionally significant infrastructure development and operation can be avoided the proposed amendment to Policy P138 would constrain the supply of public/community infrastructure thereby jeopardizing public good services.</p> <p>WELL contend that the development and operation of network utility infrastructure is already adequately regulated through the permitted activity standards and conditions contained within both regional and local level environmental development instruments.</p> | Council to reject the sought amendments to Policy P138. |
|           |                 | S279/162<br>Policy P144 | Oppose            | <p>The submission seeks to prohibit a fundamental element associated with the construction or maintenance of regionally significant infrastructure (the on-site dumping of spoil). WELL consider that <i>if</i> there is no practicable alternative method of providing for the activity on site (as indicated in clause (b) of the policy), then it needs to be provided for in the NRP policy framework.</p> <p>Automatically having to remove spoil from site has the potential to create greater impacts on natural environments rather than on-site redistribution (i.e., increased truck movements).</p>   | Council reject the submission point.                    |

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|--------------------------------------|-----------------|---------------------------|-------------------|---|---|
|                                      | Rules           | S279/185<br>Rule R104     | Oppose            | <p>The submission point seeks to exclude additions and further development associated with structures located within significant and natural wetlands.</p> <p>WELL disagree with this submission point as it will undermine the ability to efficiently and effectively respond to community services provided by critical infrastructure – such as electricity. To enable WELL to maintain infrastructure (i.e., replacing support structures) located within wetlands in the most responsive way possible, and with as minimal disruption to consumers as possible, provision in the NRP must be available for such mandatory works that will benefit the whole community.</p> | Council reject the submission point.                                    |
| Wellington International Airport Ltd | Objectives      | S282/005<br>New Objective | Support           | <p>The submission point correctly identifies that the NRP does not contain an appropriate Objective explicitly recognising the development of regionally significant infrastructure.</p> <p>WELL support the submission point in that a new Objective is included in the NRP recognising the <i>development</i> of Regionally Significant Infrastructure.</p>   | Council include a new objective in the NRP as sought by the submitter.  |
|                                      |                 | S282/008<br>Objective O12 | Support           | WELL agree with the submission point that Objective O12 be slightly amended to provide for the benefits of regionally significant infrastructure.   | Council accepts the submission point and amend Objective O12 as sought. |
|                                      | Policies        | S282/082<br>Policy P12    | Support           | WELL support the sought amendment to Policy P12 as it reflects the amendment to Objective O12.  | Council accept the submission point and amend P12 as sought.            |

| Submitter                                | Matter / Number | Provision              | Support or Oppose | Reason for Further Submission  | Decision Sought  |
|--|-----------------|------------------------|-------------------|--|--|
|  |                 | S282/030<br>Policy P13 | Support           | WELL support the inclusion of the word 'development' in Policy P13 as it will adequately reflect the submitters proposed new Objective. Furthermore, the amendment sought reflects a similar submission point made as part of WELL's original submission.  | Council accept the submission point and amend P13 as sought.       |
|  | Rules           | S282/071<br>Rule R197  | Support           | WELL consider the submission point to include the word 'Development' in Rule R197 is pragmatic, and reflects the reality that new regionally significant infrastructure located in the coastal marine area will require the use of such vehicles.  | Council accept the submission point and amend Rule R197 as sought. |
| Royal Forest and Bird Protection Society | Policies        | S353/060<br>Policy P13 | Oppose            | <p>The submission point seeks to limit the effect of Policy P13 by qualifying the benefits of regionally significant infrastructure against any other adverse environmental effects.</p> <p>WELL consider that the benefit of regionally significant infrastructure is a definitive and absolute effect (i.e., enabling the operation and function of modern society), and consequently is an effect that should not be diluted by other environmental effects.</p> <p>As the Policy P13 intent relates to the recognition of beneficial effects of regionally significant infrastructure, it is inappropriate to confuse this policy intent by the qualifiers sought by the submission.</p> | Council reject the submissions sought amendment to Policy P13.     |

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|-----------|-----------------|--|-------------------|--|---|
|           |                 | S353/126<br>S353/127<br>Policies P132 - P138 | Oppose            | The submission seeks to amend the policies by directly referencing the NZCPS.<br><br>WELL consider it is inappropriate for the NRP to directly reference the NZCPS as this is not a requirement under the RMA (the NZCPS merely needs to be given effect to in the NRP). | Council reject the submissions sought amendments. |
|           |                 | S353/128<br>Policy P139                      | Oppose            | The submission point seeks to amend the policy by replacing the word “appropriate” with the word “possible”.<br><br>WELL do not agree with the proposed amendment as it could subjectively be interpreted to impose significant costs to any given sea wall development. | Council reject the submissions sought amendments. |