

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan
for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

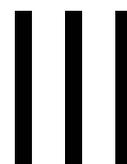
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
1. Introduction					
Vector Gas Ltd	S145/002	Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whitua committees.	Support	Given the importance and role of the whitua committees, the ability for infrastructure providers to be included in the process is supported.	Allow the point
2. Interpretation					
Vector Gas Ltd	S145/003	Retain the approach of including suites of ss9, 12 - 15 activities under a single rule.	Support	The rule framework is supported as it assists in plan interpretation and clarifies the activities covered in the specific rule.	Allow the point
NZ Transport Agency	S146/027	Amend the definition of operational requirement : <i>When an activity needs to be carried out in a particular location or way in order to be able to function <u>safely</u>, effectively and efficiently.</i>	Support	The inclusion of “safely” within the definition of operational requirement is supported as the requirement to operate safely is a key requirement of most regionally significant infrastructure.	Allow the point
Wellington Electricity Lines Limited	S126/006	Amend the definition for Regionally Significant Infrastructure to read: ... · <i>the national electricity grid</i> · <i>facilities for the generation, transmission and distribution of electricity.</i> · <i>a network (as defined in the Electricity Industry Act 2010) ...</i>	Neutral	On the basis that the National Grid is explicitly identified as regionally significant infrastructure, the amendment sought by Wellington Electricity Lines Limited is not opposed.	Neutral
Powerco	S290/060	Modify definition of Regionally Significant Infrastructure as follows: <i>Regionally significant infrastructure includes... • facilities for the generation and transmission of electricity where it is supplied to the electricity distribution network, including the national grid. • Facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local distribution network. This includes supply within the local electricity distribution network...</i>	Neutral	On the basis that the National Grid is explicitly identified as regionally significant infrastructure, the amendment sought by Powerco is not opposed.	Neutral

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
NZ Transport Agency	S146/031	Amend the definition of reverse sensitivity : <i>The vulnerability of an existing lawfully-established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activities, thereby creating the potential for the operation, <u>maintenance, upgrade and development</u> of such existing activity to be constrained.</i>	Support	Expansion of the definition is supported as it recognises it is not only the operation of existing activities which can be constrained, but also associated maintenance, upgrade and development. As the definition is used within <i>Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities</i> , the amendment is compatible with the wording within the Policy.	Allow the point
Wellington Electricity Lines Limited	S126/010	Amend the definition of 'vegetation clearance' to exclude trimming and maintenance activities associated with electricity supply networks, as follows: <i>"The clearance or destruction of woody vegetation (exotic or native) by mechanical or chemical means, including felling vegetation, spraying of vegetation by hand or aerial means, hand clearance, and the burning of vegetation. <u>Vegetation clearance for maintaining and operating safe electricity supply networks is exempt from the definition of vegetation clearance.</u>"</i>	Support	The exemption sought is supported as it recognises the need for vegetation clearance to ensure the safe the efficient operation of lines and substations, as well as being consistent with the Electricity (Hazards from Trees) Regulations 2003.	Allow the point
3. Objectives					
NZ Transport Agency	S146/043	Add new Objective : <i><u>To recognise that regionally significant infrastructure represents appropriate use and development in all environments where there are functional needs or operational requirements</u></i>	Support	The submission point appropriately recognises the functional needs and operational requirements regarding regionally significant infrastructure. In the context of the National Grid, such an objective also gives effect to Policy 3 of the National Policy Statement for Electricity Transmission 2008 ("NPSET").	Allow the point
NZ Transport Agency	S146/042	Add new objective : <i><u>The safe, effective and efficient use, operation, maintenance, upgrade and development of regionally significant infrastructure is provided for</u></i>	Support	The submission point appropriately provides for an enabling objective regarding regionally significant infrastructure. In the context of the National Grid, such an objective also gives effect to Policy 2 of the NPSET.	Allow the point
Spark New Zealand Trading Limited	S98/005	Amend Obj 12 : <i>The social, economic, cultural, and environmental <u>and health and safety</u> benefits of regionally significant infrastructure and renewable electricity generation activities are recognised. <u>Obj 12A Recognise that some existing and future regionally significant infrastructure has a functional need and/or operational requirement to be located and/or operated in a particular environment.</u></i>	Support	This submission point appropriately recognises the health and safety benefits of regionally significant infrastructure. In the context of the National Grid, proposed new objective 12A also gives effect to Policy 3 of the NPSET	Allow the point
Masterton District Council	S367/040	Retain Objective O12 with the addition of the words <i><u>"and provided for"</u></i> following the existing text.	Support	The relief sought is consistent with that sought by Transpower and would give effect to Policy 1 of the NPSET which contains a requirement to "recognise and provide for".	Allow the point

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
Meridian Energy Limited	S82/009	Amend Objective O13 in the following manner (or similar wording): <i>The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.</i>	Support	The point is supported as the removal of wording relating to the coastal marine area reflects the relief sought in Transpower's submission, particularly that reverse sensitivity issues relate to the whole region not just the coastal marine area. Deletion of the word "new" is supported as it recognizes that reverse sensitivity effects on regionally significant infrastructure can result from existing activities subject to change as well as new activities.	Allow the point
Chorus New Zealand Limited	S144/007	Amend Objective O21 as follows: <i>Inappropriate use and development in high hazard areas is avoided, <u>other than (a) where it has a functional need and/or operational requirement to be located there, and/or (b) where it is necessary to enable the efficient operation of regionally significant infrastructure.</u></i>	Support	As noted by the submitter, given the emphasis on 'avoid' within the objective, the suggested amendment would assist in determining whether proposed use and development is "inappropriate". Such an amendment would assist with plan interpretation and application of the objective.	Allow the point
NZ Transport Agency	S146/054	Amend Objective O31 : <i>Outstanding water bodies and their significant values are protected <u>from inappropriate use and development.</u></i>	Support	In addition to the reasoning provided in the submission, such an amendment would be consistent with Section 6 of the RMA, and clarify that it is not all and any development and use with outstanding water bodies that the waterbodies are to be protected from, but rather the focus is on the inappropriate activities.	Allow the point
CentrePort Limited	S121/031	Amend Objective O33 as follows: <i>Sites with significant mana whenua values are protected <u>from inappropriate use and development</u> and restored <u>where values have been compromised.</u></i>	Support	The change in emphasis afforded by the amendments sought are supported as it appropriately provides some context as to what sites are to be protected from, and when restoration is required.	Allow the point
4. Policies					
Powerco	S29/014	Modify Policy 4 as follows: <i>Where minimisation of adverse effects is required by policies in the Plan, minimisation means reducing adverse effects of the activity to the smallest amount practicable and shall <u>may</u> include: (a) consideration of alternative <u>practicable</u> locations and methods for undertaking the activity that would have less adverse effects, and including where relevant, a location outside of the (b) locating the activity away from areas identified...</i>	Support	The amendments sought are supported as they help to rationalise the policy.	Allow the point

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
Masterton District Council	S367/067	Amend Policy P4 Amend criteria (a) and insert the following as a new criteria (b), and renumbering as appropriate: " <i>(a) consideration of <u>the effects and benefits arising from using alternative locations and methods for undertaking the activity (including the costs and benefits) that would have less adverse effects, and (b) consideration of the effects of the functional or operational needs of Regionally Significant Infrastructure, and the means by which any identified adverse effects can be practicably avoided, remedied, or mitigated, and:</u></i>	Support	The amendment sought to 4a) is supported as it provides for the wider consideration of alternative locations. The provision of new policy 4b) is supported as it appropriately recognises the needs and effects of regionally significant infrastructure. Both amendments better inform the policy and will assist in plan interpretation and application.	Allow the point
Wellington City Council	S286/001	Include a new policy (or similar) in Section 4.2 Beneficial use and development: <i>Recognise the contribution existing urban areas, identified urban growth areas and infrastructure make to the social, economic and cultural wellbeing of people and communities and provide for their ongoing use and development.</i>	Support	Recognition of the contribution infrastructure makes to social, economic and cultural wellbeing is supported as it highlights the importance of this type of use and development.	Allow the point
Federated Farmers of New Zealand	S352/129	NEW Policy] <i>Reverse sensitivity - Primary production activities shall be protected from new incompatible use and development occurring under, over or adjacent to it, by the location and design of any new use and development to avoid, remedy or mitigate any reverse sensitivity effects.</i>	Oppose	The point is opposed as the matter is primarily related to land use and more appropriately addressed at the district plan level.	Disallow the submission point
Kiwi Rail Holdings Limited	S140/030	Amend Policy P7 to add: <i>(f) regionally significant infrastructure.</i>	Support	Given the importance and benefits of regionally significant infrastructure (as recognised in Obj 12) the amendment to Policy P7 is supported.	Allow the point
Vector Gas Ltd	S145/028	Amend Policy 12: <i>The benefits of regionally significant infrastructure and renewable energy generation activities are recognised and provided for by having regard to taking into account:</i> <i>(a) . . .</i> <i>(b) the investment in, and the location of existing infrastructure and structures, and (c)</i> <i>(d) the functional need for port activities and other regionally significant infrastructure to be located within the coastal marine area and the coastal area, and (e) the functional need for regionally significant infrastructure to be located over, under, within and adjacent the beds of rivers and lakes, and</i> <i>(f).....</i>	Support	For the reasons outlined in the submission, the amendment sought by Vector Gas Ltd is supported. Specific to the National Grid, recognition of the technical and operational requirements proposed within this amendment is consistent with Policy 3 of the NPSET.	Allow the point
NZ Transport Agency	S146/083	Amend Policy 13: <i>The use, operation, maintenance, and upgrade and development of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate. Or Retain Policy 13 (i.e. excluding 'development') and add a new policy to enable new development: <u>The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.</u></i>	Support	The amendment/addition of a new policy relating to development of regionally significant infrastructure is supported as it appropriately recognises that development of infrastructure will continue to occur and is required given the essential nature of regionally significant infrastructure.	Allow the point

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NZ Transport Agency	S146/090	Amend Policy 25 : <i>Use and development shall avoid, <u>remedy or mitigate significant</u> adverse effects on natural character in the coastal marine area (including high natural character in the coastal marine area) and in the beds of lakes and rivers, and avoid, remedy or mitigate other adverse effects of activities, taking into account: (d) whether it is practicable to protect natural character from inappropriate use and development through the use and development is appropriate after <u>considering: (i) using on the use of alternative locations,</u> or form of development that would be more appropriate to that location; and (ii) considering the extent to which functional need or existing use limits location and development options; (iii) <u>whether the use or development is regionally significant infrastructure.</u></i>	Support	The amendments to the policy are supported as they recognise the reality that some use and development (particularly in relation to regionally significant infrastructure) can be appropriate based on consideration of the relevant matters set out in the policy.	Allow the point
Spark New Zealand Trading Limited	S98/019	Amend Policy 132 : <i>Use and development in the coastal marine area shall.. <u>(h) recognise the location, operation and function of existing regionally significant infrastructure.</u></i>	Support	The addition to the policy is supported as there are circumstances where co-location is not practical. An example of this is the Cook Strait cable, where a concentration of infrastructure would be inappropriate given the nature and importance of the National Grid cables.	Allow the point
5.2 Rules – Discharges to Water					
Wellington Water Limited	S135/138	Rule R42: Minor discharges - permitted activity. Provide a special category of permitted activity for regionally significant infrastructure, or have consents trigger to controlled activity status.	Support	The provision of a rule is supported in principle as it recognises the importance and role of regionally significant infrastructure.	Allow the point
Best Farm Limited, Hunters Hill Limited and Stebbings Farmlands Limited	S149/015	Amend Rule R48(b) to only exclude stormwater discharges from contaminated land where the discharge is from an area(s) of that land that is known to be contaminated.	Support	The submission point is supported as it aligns with the submission point of Transpower seeking an amendment to the definition of Contaminated Land to confirm that it only relates to land confirmed as contaminated (i.e. Category III land).	Allow the point
Kapiti Coast Airport Holdings Limited	S99/025	Amend Rule R48 : <i>Stormwater from an individual property - permitted activity. The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an individual property <u>(including any property that contains regionally significant infrastructure)</u> is a permitted activity, provided the following conditions are met: . . .'</i>	Support	The submission point is supported as it clarifies that the rule also applies to a site containing regionally significant infrastructure.	Allow the point
5.3 Rules – Discharges to Land					
NZ Transport Agency	S146/154	Amend Rule R67 : <i>The discharge of water or contaminants into water, or onto or into land where it may enter water: (a) inside a site or habitat identified in ... and (b) that is not permitted by Rules R42, R43, R44 or R45; and (c) that is not a discharge associated with a <u>regionally significant infrastructure</u></i> Or Introduce a new discretionary rule specific to discharges of water or contaminants into water, or onto or into land where it may enter water from regionally significant infrastructure inside sites of significance.	Support	Transpower supports the introduction of a discretionary activity rule providing for discharges from regionally significant infrastructure inside sites of significance, as such a rule recognises the importance and benefit of regionally significant infrastructure, and reflects the policy framework relating to regionally significant infrastructure.	Allow the point

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
5.5 Rules – Wetlands and Beds of Lakes and Rivers					
NZ Transport Agency	S146/163	5.5.3 Activities in wetlands. Add a new rule for existing structures in all wetlands. <u>Existing permitted or otherwise lawfully established structures in any wetland existing at the date of notification of the Proposed Natural Resource Plan, and the use of those structures, is a permitted activity.</u>	Support	The rule is supported as it recognises existing lawfully established activities.	Allow the point
NZ Transport Agency	S146/162	5.5.2 Wetlands general conditions Amend general conditions:... (d) once operational, new structures are designed and installed and maintained, and activities are carried out in a manner to ensure that fish passage is maintained at all times, and (e) during construction or maintenance works, fish passage shall not be restricted for a duration longer than necessary to undertake the activity and must not be restricted for a period longer than 12 hours in any 72 hour period; and...	Support	For the reasons outlined in the NZ Transport Agency submission, the amendments relating to fish passage are supported.	Allow the point
NZ Transport Agency	S146/164	Amend Rule R104 : is a permitted activity, provided the following conditions are met: (f) only hand-held machinery is used in any area of the natural wetland <u>unless water has been temporarily diverted from the working area, and...</u>	Support	The amendment sought is supported as it helps to clarify the circumstances for use of non-hand held machinery.	Allow the point
Wellington Electricity Lines Limited	S126/027	Amend Rule R104 : Structures in natural wetlands and significant natural wetlands - permitted activity Add a new rule to account for maintenance, repair, addition or replacement of existing regionally significant infrastructure structures within natural and significant natural wetlands as a Controlled Activity. The new rule should be worded as follows: <u>Rule RXX: Activities in natural wetlands and significant natural wetlands - Controlled activity. Activities for the purpose of maintenance, repair, addition, alteration, or replacement (like for like) of an existing structure, that are not permitted by rules R104 and R105, are controlled activities provided the following condition is met: (a) The activities relate to existing structures that are components of regionally significant infrastructure; (b) the activity shall comply with the wetland general conditions for activities in natural wetlands, significant natural wetlands and outstanding natural wetlands specified above in Section 5.5.2</u>	Support	As an alternative to the relief sought by Transpower in its submission, that sought by Wellington Electricity is supported as it provides a pragmatic approach to recognising and providing for regionally significant infrastructure.	Allow the point should the relief sought by Transpower in its original submission not be accepted
Rangitane o Wairarapa Inc	S279/185	Amend Rule R104 : Structures in natural wetlands and significant natural wetlands - permitted activity. Amend the rule to include an exclusion for additions and new structures in sites of significance to tangata whenua and to provide a new rule for these activities to ensure that a resource consent application is required.	Oppose	Transpower opposes application of discretionary activity or non-complying activity status to any permitted activity on the basis that such an approach would be overly onerous and not reflect the scale of effects associated with the permitted activities.	Disallow the point
Environmental Defence Society Incorporated	S110/015	Amend Rule R107 : Replace discretionary activity status with non-complying.	Oppose	Discretionary activity status is supported and provides the opportunity for a full assessment of the effects. Non-complying activity status is considered overly onerous and is not supported.	Disallow the point

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
NZ Transport Agency	S146/167	Amend Rule R107 : <i>The following activities in a natural wetland or significant natural wetland except for those stipulated in and carried out in accordance with a restoration management plan under Rule R106:</i> <i>(a) the placement of new structures with a footprint of 10m2 or greater for the purpose of hunting and recreation (including maimai and jetties), and all other structures,</i> <i>... (d) the operation, maintenance, upgrade and development of regionally significant infrastructure</i> <i>... (k) reclamation (including drainage or diverting of water to an extent that the area affected ceases to have the characteristics of a natural wetland), are discretionary activities.</i>	Support	As an alternative to the relief sought by Transpower in its submission, that sought by the NZ Transport Agency is supported as it recognises and provides for regionally significant infrastructure.	Allow the point
NZ Transport Agency	S146/169	Amend Rule R109 <i>The following activities in an outstanding natural wetland identified in Schedule A3 (outstanding wetlands), except those stipulated in and carried out in accordance with a restoration management plan under Rule R106: (a) the maintenance, repair or replacement (like for like) of existing structures, (b) the placement of new structures of an area less than 10m2 for the purpose of hunting and recreation (including maimai and jetties) (c) activities associated with the operation, maintenance, upgrade or development of regionally significant infrastructure, including reclamation and the discharge of stormwater, (d) the removal of existing structures, (e) removal of pest plants that are not permitted by Rule R105 are discretionary activities.</i>	Support	As an alternative to the relief sought by Transpower in its submission, that sought by the NZ Transport Agency is supported as it recognises and provides for regionally significant infrastructure.	Allow the point
NZ Transport Agency	S146/170	Amend Rule R106 and R109 : <i>The following activities, in an outstanding natural wetland identified in Schedule A3 (outstanding wetlands), except for those stipulated in and carried out in accordance with a restoration management plan under Rule R106 or enabled as a discretionary activity under Rule 109: (a) the discharge of water or contaminants other than stormwater... (c) the placement of new structures with an area 10m2 or greater for the purpose of hunting and recreation (including maimai and jetties), and all other structures, ...</i>	Support	As an alternative to the relief sought by Transpower in its submission, that f sought by the NZ Transport Agency is supported as it recognises and provides for regionally significant infrastructure.	Allow the point
NZ Transport Agency	S146/173	Add a new rule for existing structures in all rivers and lakes: <i>Existing permitted or otherwise lawfully established structures in any river or lake existing at the date of notification of the Proposed Natural Resources Plan, and the use of those structures, is a permitted activity.</i>	Support	The rule is supported as it recognises existing lawfully established activities.	Allow the point

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
NZ Transport Agency	S146/181	Amend Rule R125 : Structures within a site identified in Schedule C (mana whenua) - restricted discretionary activity. <i>The placement or construction and subsequent use of a river crossing structure, a culvert, new small dam, or other small structure that that is fixed in, on, over or under the bed of a river within a site identified in Schedule C (mana whenua), including any associated: . . . (l) unless the structure and use is associated with the use, operation, maintenance, upgrade or development of regionally significant infrastructure in which case (h) - (k) do not apply. Matters for discretion: 1. Effects on sites with significant mana whenua values. 2. The functional need and operational requirements of regionally significant infrastructure.</i>	Support	Notwithstanding the relief sought in its submission, Transpower supports the relief sought by the NZ Transport Agency as it provides for regionally significant infrastructure which is often subject to locational and operational constraints.	Allow the point should the relief sought by Transpower in its original submission not be accepted
Royal Forest and Bird Protection Society	S353/154	Change activity status for Rules R126 and R127 to prohibited	Oppose	A change in activity status is opposed as it is considered overly onerous. The activity status as notified allows for a full consideration and assessment of effects.	Disallow the point
NZ Transport Agency	S146/182	Amend Rule R127 : <u>Except for the reclamation associated with infrastructure of regional significance which is regulated under Rule 129, t</u> The reclamation of...	Support	The amendment is supported as it provides clarity as to the activity status.	Allow the point
5.7 Rules – Coastal Management					
Rangitane o Wairapa Inc	S279/213	The rules in this section that require discretionary or non-complying consent for activities within sites identified in Schedules A to F are supported. Where rules do not require discretionary or non-complying consent for activities within sites in those schedules, rules should be amended or added to do so. Rules should be amended and added to manage the actual and potential effects of oil and gas exploration and extraction, and mining of minerals and other materials from the coastal marine area, through resource consents of a status no lower than restricted discretionary activity status.	Oppose	The submission point is opposed in part in relation to the request that <i>'Where rules do not require discretionary or non-complying consent for activities within sites in those schedules, rules should be amended or added to do so'</i> . The outcome sought through this relief is unclear but Transpower opposes the application of discretionary activity or non-complying activity status to any permitted or controlled activities on the basis that such an approach would be overly onerous and not reflect the scale of effects associated with the permitted and controlled activities.	Disallow the point
Wellington International Airport Limited	S282/058	Retain Rule R149 : Maintenance or repair of structures - permitted activity	Support	The rule is supported as the activity status is appropriate in the context of the nature and scale of the likely effects of the activity.	Allow the point
NZ Transport Agency	S146/199	Amend Rule R155 to include a new matter for discretion: <i>11. whether the structure is associated with the use, operation, maintenance, upgrading or development of regionally significant infrastructure</i>	Support	The new matter of assessment is supported as it appropriately recognises regionally significant infrastructure.	Allow the point

Details of the submission you are commenting on	Submission reference	Relief sought in the Submission (as derived from the summary)	Transpower position	Reasons	Relief sought
NZ Transport Agency	S146/202	Retain Rule R162 , subject to providing for a new rule managing new structures, additions or alterations to a structure and the associated use of the structure inside a site or habitat identified in Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) or Schedule J (geological features) in the coastal marine area where associated with regionally significant infrastructure.	Support	Given the importance and benefit of regionally significant infrastructure, Transpower supports a discretionary rule where there is a functional and operational need. Such an activity status is appropriate and still allows a full assessment of the effects.	Allow the point
NZ Transport Agency	S146/204	Amend Rule R164 : Matters for discretion 8. <u>whether the structure is associated with the use, operation, maintenance, upgrading or development of regionally significant infrastructure</u>	Support	Given the importance and benefit of regionally significant infrastructure, Transpower supports this further matter of discretion.	Allow the point
NZ Transport Agency	S146/208	Amend Rule R182 : <u>Occupation of space by regionally significant infrastructure and a structure owned by a network utility operator - permitted activity. The occupation of space in the common marine and coastal area by a structure existing before the date of public notification of the Proposed Natural Resources Plan (31.07.2015) which is regionally significant infrastructure or owned by a network utility operator is a permitted activity.</u>	Support	The amendments are supported as they clarify that the rule applies to regionally significant infrastructure.	Allow the point
Wellington International Airport Limited	S282/074	Rule R204 : WIAL seeks that the relationships between Rules R165, R166, R194, R204, R208, R210 and R216 be reviewed to ensure that unnecessary duplication of control is avoided and that an all-inclusive non-complying activity status is not applied to activities that are otherwise provided for by the Proposed Plan.	Support	Transpower agrees the relationship is unclear and that further clarity would assist in plan interpretation and application.	Allow the point
NZ Transport Agency	S146/217	5.7.19 Destruction Add a new rule or amend rule 204 to specifically provide for destruction, damage or disturbance inside a site of significance as a discretionary activity where associated with regionally significant infrastructure	Support	Discretionary activity status recognises the role, importance and benefits of regionally significant infrastructure. Such an activity status is appropriate and still allows a full assessment of the effects.	Allow the point