

In the Environment Court of New Zealand
Wellington Registry

I te Kōti Taiao o Aotearoa
Ki te Whanganui-a-tara

ENV -

Under	The Resource Management Act 1991
In the matter of	an appeal under clause 14 of the First Schedule to the Resource Management Act 1991
Between	Meridian Energy Limited
	Appellant
	Wellington City Council
	Respondent

**Notice of appeal against parts of the decisions of the Wellington City Council
on the Wellington City Proposed District Plan**

18 August 2025

Appellant's solicitors:

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**anderson
lloyd.**

To: The Registrar of the Environment Court at Wellington

- 1 Meridian Energy Limited (**Appellant**) appeals against parts of the decisions of the Wellington City Council (**Respondent**) to accept most of the recommendations of the Independent Hearings Panel on Hearing Streams 6 to 11 of the Wellington City Proposed District Plan (**WCPDP**) (**Decisions**).
- 2 The Appellant made a submission and a further submission on the Proposed Plan.
- 3 The Appellant is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991 (the **RMA**).
- 4 The Appellant received notice of the Decisions on 7 July 2025.
- 5 The Decisions were made by the Respondent.
- 6 This appeal is made under clause 14 of the First Schedule of the Resource Management Act 1991 (**RMA**).

Parts of the WCPDP Decisions appealed

- 7 The Appellant now appeals the Respondent's Decisions in relation to:
 - (a) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: deletion of publicly notified Policy REG-P8;
 - (b) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Policy REG-P8 (formerly publicly notified Policy REG-P9);
 - (c) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: new Policy REG-P9 (referred to in Council's Decision Report (Report and Recommendations of Independent Commissioners Hearing Stream 9 Report 9) as Policy REG-PX;
 - (d) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Policy REG-P11
 - (e) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Rule REG-R5 (1);
 - (f) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Rule REG-R6 (1);

- (g) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Standard REG-S9; and
- (h) Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Standard REG-S10.

Reasons for appeal and relief sought

- 8 The reasons for the appeal and the relief sought are set out in **Table 1** below.
- 9 The Appellant also seeks such further, consequential or alternative relief as may be necessary or appropriate to address the reasons for the appeal or give effect to the relief sought, including giving better effect to the NPS-REG, and as a result of changes to the plan that may arise from other related appeals.

Table 1		
Provision being appealed	Reasons for appeal	Relief sought
Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Policies REG-P8, REG-P9, REG-P11, Rule REG-R5 (1) and deletion of publicly notified Policy REG-P8	<ol style="list-style-type: none"> 1. Meridian's submission supported in principle publicly notified Policy REG-P8 ('providing for' the upgrading of REG). Meridian requested its retention with minor amendment to ensure consideration of the character of the existing environment. 2. Meridian accepts that some rationalisation of the REG policies is appropriate to give effect to relevant NZCPS policy direction and to provide for the values of overlay areas, as they relate to new REG. This is to be achieved in new Policy REG-P9 (formerly referred to during Hearing 9 and in the Hearing Panel's Hearing 9 Report as 'Policy REG-PX'). Meridian does not consider that the rationalisation of REG policies, and introduction of new Policy REG-P9, provides appropriately for the upgrading of existing REG. 3. Meridian opposes the deletion of Policy REG-P8. Meridian supports combining Policies REG-P8 and REG-P11, provided the wording of each is retained in a combined policy. Meridian proposed such a 	<ol style="list-style-type: none"> 1. Reinstate publicly notified Policy REG-P8 with amendment as set out below (with additions <u>underlined</u> and deletions struck through): <p>REG-P8 Upgrading existing large scale renewable electricity generation activities</p> <p>Provide for the upgrading of existing large scale renewable electricity generation activities, including replacing or upgrading wind turbines and their support structures and ancillary facilities within existing wind farms, where the activity:</p> <ol style="list-style-type: none"> 1. <u>Increases the generation capacity of existing renewable electricity generation activities and improves generation efficiency; or</u> 2. <u>Allows for the re-use of existing structures and associated infrastructure or improves the resilience, safety or reliability of renewable electricity generation activities; or</u> 3. <u>Results in other environmental benefits or enhancements; and</u>

	<p>combined policy to Hearing Stream 9. This combined approach has not been achieved by the deletion of Policy REG-P8 and retention (unchanged) of Policy REG-P11.</p> <p>4. Importantly, deletion of Policy REG-P8 deletes the ‘provide for’ approach for upgrading of REG. This conflicts with the objective of the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) which is <i>‘to recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities’</i>.</p> <p>5. The deletion of Policy REG-P8 also conflicts with Policy E3 of the NPS-REG which requires district plans to include objectives, policies and methods including rules to <i>provide for</i> the development, operation, maintenance <i>and upgrading</i> of new and existing wind energy generation activities to the extent applicable to the region or district.</p>	<p>4. <u>Manages adverse effects on the environment in accordance with Policy REG-PX¹ clauses (1) to (7); and</u></p> <p>5. Avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on the identified values of any Overlay or any adjacent Overlay, high coastal natural character area, or coastal margin or riparian margin in the coastal environment;</p> <p>5. Has a functional need or operational need for its location; and</p> <p>6. Minimises adverse effects, including adverse cumulative effects, on:</p> <ol style="list-style-type: none"> Landscape, visual or amenity values of the site and surrounding area, having regard to: <ol style="list-style-type: none"> The scale, intensity, duration or frequency of effects; The size and shading of any structures associated with the activity; The design and site layout of the activity and its ability to internalise effects, including and blade or shadow flicker; Traffic generation, earthworks and construction effects;
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¹ This refers to the policy that was referred to in the Report and Recommendations of Independent Commissioners Hearing Stream 9 Report 9 as ‘Policy REG-PX’ and which appears in the Decisions Version of the Plan as ‘Policy REG-9’. To accommodate the relief Meridian seeks, this policy will need to be re-numbered.

	<p>6. No submission sought the deletion of Policy REG-P8.</p> <p>7. Meridian also opposes the amendment of publicly notified Policy REG-P9 to capture upgrading of REG as well as new REG. No submission requested this amendment to Policy REG-P9. Meridian notes that publicly notified Policy REG-P9 is now numbered REG-P8 in the Decisions Version proposed District Plan within the Council's online E-plan.</p> <p>8. Meridian also opposes the insertion of new Policy REG-P9 to the extent that it applies to the upgrading of existing REG. New Policy REG-P9 contrasts with publicly notified Policy REG-P8 by replacing the 'provide for' approach mandated by the NPS-REG with an 'only allow' approach for upgrading of existing REG.</p>	<p>v. Potential adverse effects from scale, colour, shading, lighting, glare, reflectivity, blade or shadow flicker, or noise, and the potential to cause sleep disturbance or annoyance; and</p> <p>vi. Whether there is adequate separation from existing sensitive activities to ensure conflict between activities, including potential reverse sensitivity effects, are minimised;</p> <p>b. The natural character of the coastal environment;</p> <p>c. The natural character of coastal margins and riparian margins;</p> <p>d. Ecology and biodiversity values, including terrestrial ecology and avifauna; and</p> <p>e. Existing navigation or telecommunication facilities;</p> <p>while having regard to any adaptive management, offsetting measures or environmental compensation which may benefit the local environment or affected community.</p>
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		<p>2. Re-number Decisions Version Policy REG-P8 as 'REG-P9' (as it was in the publicly notified plan) and amend the policy as follows (with additions <u>underlined</u> and deletions struck through):</p> <p><u>REG-P8 REG-P9</u> Large <u>New large scale</u> renewable electricity generation activities in the General Rural Zone outside specified Overlays, high coastal natural character areas, and coastal and riparian margins</p> <p>Provide for <u>new</u> large scale renewable electricity generation activities, including the upgrading of existing activities, in the General Rural Zone, including within the coastal environment, where:</p> <p>1. They are located outside: ...</p> <p>3. Delete from Decisions Version Policy REG-P9² the reference to altered buildings as follows:</p>
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² Referred to in the Council's Decision Report (Report and Recommendations of Independent Commissioners Hearing Stream 9 Report 9) as Policy REG-PX.

		<p>REG-P9 Large scale renewable electricity generation activities within Specified Overlays</p> <p>Only allow new or altered buildings, structures, access tracks, roads, transmission facilities and earthworks for the purpose of large scale renewable electricity generation activities, including the upgrading of existing activities, in the General Rural Zone in the Overlays specified below where: ...</p> <p>4. Delete from Rule REG-R5 (1) matters of discretion the references to Policies REG-P9 and REG-P11 as follows (with additions <u>underlined</u> and deletions shown struck through):</p> <p>REG-R5 Upgrading of existing large scale renewable electricity generation activities</p> <p>[In the GRUZ zone and Brooklyn Hill Wind Turbine]:</p> <p>1. Activity status: Restricted Discretionary Where:</p> <p>a. Compliance is achieved with REG-S11; and</p> <p>b. For any proposal involving wind generation, compliance is achieved with NZS 6808:2010</p>
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		<p>Acoustics - Wind farm noise, REG-S9 and REG-S10.</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> 1. Any new or additional adverse effects); 2. The relevant matters in REG-P1, REG-P2, <u>and</u> REG-P8 REG-P9 and REG-P11; 5. Delete Policy REG-P11, as a consequence of reinstating Policy REG-P8 and including the substance of Policy REG-P11 in reinstated Policy REG-P8: <p>REG-P11 Upgrading existing renewable electricity generation activities and providing for technological advances Recognise the benefits of upgrading of existing renewable electricity generation activities, including the adoption of new and updated technologies and the repowering of existing wind turbines, where the upgrading or repowering activity:</p> <ol style="list-style-type: none"> 1. Increases the generation capacity of existing renewable electricity generation activities and improves generation efficiency; 2. Improves access to renewable energy sources;
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		<p>3. Allows for the re-use of existing structures and associated infrastructure where appropriate;</p> <p>4. Increases the resilience, safety or reliability of renewable electricity generation activities; or</p> <p>5. Results in other environmental benefits or enhancements.</p>

Provision being appealed	Reasons for appeal	Relief sought
<p>Part 2 District-wide matters – Energy, Infrastructure, and Transport - Chapter REG Renewable Electricity Generation: Rules REG-R5 (1) and REG-R6 (1) and Standards REG-S9 and REG-S10</p>	<ol style="list-style-type: none"> 1. Meridian's submission opposed standards REG-S9 and REG-S10 in addition to the requirement to comply with NZS6808:2010. These standards are imposed through Rules REG-R5 (1) (b) and REG-R6 (1) (a). 2. Meridian's reasons are that the substance of standards REG-S9 and REG-S10 are already explicit within NZS6808:2010 and there is no need to duplicate those. 3. Meridian is also concerned that there is duplication and potential conflict between the inclusion of the three noise standards (NZS6808:2010, REG-S9 and REG-S10) and noise as a restricted discretionary matter in discretionary matter (4) in Rule REG-R5. Discretionary matter (4) is 'the ability to mitigate any adverse noise effects experienced by adjacent properties'. This suggests that, while compliance with the noise standards will be required, there may also be additional noise matters considered. It also suggests that similar or different noise considerations may be relied on imposing conditions or in declining consent. There is uncertainty about what 'any' adverse noise effects experienced by adjacent properties will mean in practice. It could include noise effects even 	<ol style="list-style-type: none"> 1. Delete from Rule REG-R5 (1) (b) the reference to Standards REG-S9 and REG-S10 and delete existing matter of discretion (4) and replace it with an alternative matter of discretion targeted at operational turbine noise in accordance with NZ6808 (as well as deleting references to Policies REG-P9 and REG-P11 in matter of discretion (2)) as follows (with additions <u>underlined</u> and deletions struck through):: <p>REG-R5 Upgrading of existing large scale renewable electricity generation activities</p> <p>1. Activity status: Restricted Discretionary Where:</p> <p>a. Compliance is achieved with REG-S11; and</p> <p>b. For any proposal involving wind generation, compliance is achieved</p>

Provision being appealed	Reasons for appeal	Relief sought
	<p>where these comply with NZS6808:2010. This outcome creates uncertainty and inconsistency within the rule.</p> <p>4. Meridian considers that compliance with NZS6808:2010 is all that is required in both Rules (REG-R5 (1) (b) and REG-R6 (1) (a)). NZS6808:2010 is a bespoke wind farm noise standard for New Zealand conditions and is sufficient for the purposes of Rules REG-R5 and REG-R6.</p> <p>5. It is also notable that restricted discretionary matter (4) in Rule REG-R5 (1) is not necessary to address potential non-compliance with the noise standards in Rule REG-R5 (1). That is because non-compliance with those standards means an application would be considered as a discretionary activity under the separate Rule REG-R5 (2). As a consequential amendment, the reference to noise effects as a discretionary matter in Rule REG-R5 (1) (4) should be deleted, and replaced with a more precise matter of discretion which is focussed on the assessment, measurement and control of operational wind turbine noise in accordance with NZS6808.</p>	<p>with NZS 6808:2010 Acoustics - Wind farm noise, REG-S9 and REG-S10.</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> 1. Any new or additional adverse effects; 2. The relevant matters in REG-P1, REG-P2, and REG-P8 REG-P9, and REG-P11; 3. 4. <u>The assessment, measurement and control of noise to comply with New Zealand Wind Farm Noise Standard (NZS 6808:2010 Acoustics – Wind Farm Noise). The ability to mitigate any adverse noise effects experienced by adjacent properties;</u> <p>2. Delete from Rule REG-R6 (1) (a) the reference to Standards REG-S9 and REG-S10 as follows (deletions shown struck through)::</p>

Provision being appealed	Reasons for appeal	Relief sought
		<p>REG-R6 New large scale renewable electricity generation activities</p> <p>1. Activity status: Discretionary</p> <p>Where:</p> <p>a. For any proposal involving wind generation, compliance is achieved with NZS 6808:2010 Acoustics - Wind farm noise, REG-S9 and REG-S10.</p>

Mediation

10 The Appellant agrees to participate in an Environment Court assisted mediation/ADR process for this appeal.

Dated this 18th day of August 2025

A handwritten signature in cursive script, appearing to read "m. Garbett", is written above a horizontal line.

Michael Garbett/Rebecca Kindiak
Counsel for the Appellant

Documents attached to appeal

- 11 The following documents are relevant to this notice of appeal:
- (a) Annexure 1: A copy of Meridian Energy Limited's submission on the Wellington City Proposed District Plan;
 - (b) Annexure 2: A copy of Meridian Energy Limited's further submission on the Wellington City proposed District Plan;
 - (c) Annexure 3: The decisions version of the WCPDP can be found here: <https://eplan.wellington.govt.nz/proposed/>; and
 - (d) Annexure 4: A list of names and addresses of persons to be served with a copy of this notice.

Address for service of the Appellants

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Otago House Level 12

477 Moray Place

Dunedin 9016

Phone: 03 4773973

Email: michael.garbett@al.nz

Contact persons: Michael Garbett

Advice to recipients of copy of notice of appeal

How to become party to proceedings

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must:

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the Appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

How to obtain copies of documents relating to appeal

The copy of this notice served on you does not attach a copy of the appellant's submission and (or) the decision (or part of the decision) appealed. These documents may be obtained, on request, from the appellant.

Advice

If you have any questions about this notice, contact the Environment Court in Wellington.



Monday, September 12, 2022

The Chief Executive
Wellington City Council
P O Box 2199
Wellington 6140

Meridian Energy Limited
P O Box 2128 Christchurch,
New Zealand
027 8011 255
andrew.guerin@meridianenergy.co.nz

Kia ora

PROPOSED WELLINGTON CITY DISTRICT PLAN: SUBMISSION OF MERIDIAN ENERGY LIMITED

I attach the submission of Meridian Energy Limited (**Meridian**) on the Council's Proposed District Plan.

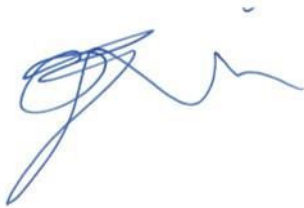
Meridian established and operates the Brooklyn Wind Turbine and the West Wind and Mill Creek Wind Farms. Meridian is a mixed ownership company in which the New Zealand Government retains a majority ownership. Meridian's core business is the generation, marketing, trading and retailing of electricity from renewable sources and the management of assets and ancillary structures for these purposes in New Zealand.

Meridian provided feedback on the Council's Draft Proposed District Plan and is pleased that some of Meridian's points are reflected in the amended provisions publicly notified as the Proposed District Plan. Meridian acknowledges the positive recognition and provision included in the Proposed Plan for the establishment, operation and upgrading of renewable electricity generation facilities (including wind and solar generation). However, it is not enough. The world has changed since the commencement of drafting the Proposed District Plan. The Government has committed to climate change adaptation and greenhouse gas emission targets that will only be realised by transitioning New Zealand's economy (including Wellington City) away from dependence on fossil fuels and to greater reliance on renewable electricity. That requires increased generation from existing renewable electricity generation facilities and new renewable electricity generation capacity. All cities and districts must do their bit to achieve the emerging targets. That means that District Plans need to enable (not just recognise) increased generation from renewable energy sources. Meridian appreciates that Wellington City Council is committed to transitioning the City to a net zero carbon environment by 2050. The Council's Proposed District Plan is a good start but we consider that it needs to go further in enabling renewable electricity generation, to contribute to achieving this and the nation's goals. Meridian has included ways in which this could be achieved in the attached submission. Meridian would welcome an opportunity to discuss with you and your Team the issues raised in the attached submission.

Meridian requests the relief specified in the attached submission, or such further or other relief as will address the issues raised in the submission.

Meridian would welcome an opportunity to participate in pre-hearing meetings, including with other submitters, to explore amendments to address the requested decisions outlined in the attached submission. Please don't hesitate to contact me if there are any matters that you or your Team wish to clarify or to discussion refinements to the proposed District Plan provisions that would address Meridian's requested relief.

Ngā mihi

A handwritten signature in blue ink, appearing to read 'Guerin', with a stylized flourish at the end.

Andrew Guerin
Environmental Manager
Wellington

Wellington City Proposed District Plan - submission form

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Clause 6 of the First Schedule, Resource Management Act 1991.

How to make a submission

- online at eplan.wellington.govt.nz/proposed
- email your submission to: PDPsubmissions@wcc.govt.nz
- post this form to us (no stamp needed)
- drop your completed form off to Wellington City Council reception, Level 16, 113 The Terrace.

To make sure your submission can be accepted please lodge by 5pm Monday 12 September 2022.

Privacy statement - what we do with your personal information

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified Proposed Plan process.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at district.plan@wcc.govt.nz.

Your details

Name	MERIDIAN ENERGY LIMITED		
Postal address (including suburb)	P O BOX 2146, CHRISTCHURCH 8140		
Phone/mobile	027 8011 255	Email	andrew.guerin@meridianenergy.co.nz
I am making this submission: <input type="checkbox"/> as an individual <input checked="" type="checkbox"/> on behalf of an organisation. Organisation's name:			
I would like to be heard in support of my submission in person <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

This is a submission on the Wellington City Proposed District Plan

<input type="checkbox"/> I could <input checked="" type="checkbox"/> I could not – gain an advantage in trade competition through this submission
If you could gain an advantage in trade competition through this submission answer the next question.
<input checked="" type="checkbox"/> I am <input type="checkbox"/> I am not – directly affected by an effect of the subject matter of the submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition. (Please tick relevant box if applicable) Note: If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Multiple provisions can be commented on within the following section. Feel free to add more pages to your submission to provide a fuller response.

The specific provision of the plan that my submission relates to: Are detailed in the Table of Submission Points attached to Do you: <input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Amend this submission form
What decision are you seeking from the Council? And why? The reasons for Meridian' submission and the relief Meridian is seeking are detailed in the Table of Submission Points attached to this submission form. Where the primary relief is not granted, Meridian requests such further or other relief as will address the issues raised in the submission.

Proposed Wellington City District Plan: SUBMISSION POINTS OF MERIDIAN ENERGY LIMITED

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
SCA Strategic Objectives				
Objective SCA-01	<p>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:</p> <ol style="list-style-type: none"> 1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised; 2. The City is able to function safely, efficiently and effectively; 3. The infrastructure network is resilient in the long term; and 4. Future growth and development is enabled and can be sufficiently serviced. 	Support in part	<p>Meridian agrees that infrastructure, including regionally significant infrastructure, is essential to support the safe, efficient and effective functioning of Wellington's community. Achieving resilience in infrastructure networks will require continual development, maintenance, adaptation and upgrading of existing infrastructure to meet future growth and changing needs. If Wellington, along with the Wellington region and New Zealand, are to successfully transition away from dependence on fossil fuels and meet the nation's climate change obligations, there will need to be a substantial increase in generation of electricity from renewable sources. Regional and district plans need to anticipate this and enable increased renewable electricity generation.</p>	<p>Amend Objective SCA-01 as follows or similar wording to achieve the same outcome:</p> <p>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:</p> <ol style="list-style-type: none"> 1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised; 2. The City is able to function safely, efficiently and effectively; 3. The infrastructure network is resilient in the long term; 4. <u>Infrastructure, including renewable electricity generation facilities, contribute to the transition away from dependence on fossil fuels;</u> and 5. Future growth and development is enabled and can be sufficiently serviced.
Objective SCA-04	Regionally significant infrastructure is provided for in appropriate locations and the social, cultural economic, and environmental benefits of this infrastructure are recognised and provided for.	Support	Objective SCA-04 appropriately gives effect to the NPS-Renewable Electricity Generation 2011. The policies and rules of the Plan that give effect to Objective SCA-04 need to be refined to genuinely provide for renewable electricity generation activities, as an essential form of regionally	Retain Objective SCA-04.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
			significant infrastructure, if New Zealand's aim of transitioning away from dependence on fossil fuels is to be achieved.	
Objective SCA-O5	The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.	Support in part	Objective SCA-O5 appropriately gives effect to the NPS-Renewable Electricity Generation 2011. However, the expression adopted by the National Planning Standards and typically used is 'functional needs' and 'operational needs' (rather than 'technical' needs) and 'functional need' is a defined term in the Plan.	Retain Objective SCA-O5 with the following amendment to align with the National Planning Standards: The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits , and the technical functional and operational needs of infrastructure.
Objective SCA-O6	Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects.	Support	Objective SCA-O6 appropriately gives effect to the NPS-Renewable Electricity Generation 2011 and is necessary to protect all infrastructure, including regionally significant infrastructure.	Retain Objective SCA-O6.
SRCC Sustainability, Resilience & Climate Change				
Objective SRCC-O1	The City's built environment supports: 1. A net reduction in the City's carbon emissions by 2050; 2. More energy efficient buildings;	Support	An increase in the generation of electricity from renewable sources (including wind and solar) is necessary to meet growing demand locally and nationally and to enable New Zealand to meet its objectives for renewable electricity generation and minimise the use of fossil fuels.	Retain Objective SRCC-O1.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	<p>3. An increase in the use of renewable energy sources; and</p> <p>4. Healthy functioning of native ecosystems and natural processes.</p>			
CE Coastal Environment				
CE Coastal Environment Introduction	This chapter only applies to the inland extent of the coastal environment, which is identified on the District Plan maps. Any activities within the coastal marine area fall within the responsibility of Greater Wellington Regional Council. ...	Oppose in part	<p>The text describing Wellington's coastline is only partially accurate. The description fails to acknowledge the presence of the turbines, roads and other built facilities in the West Wind and Mill Creek wind farms. In this respect the description inaccurately depicts the actual character of the visible backdrop to the Moana Raukawa coastal environment as 'largely undeveloped'.</p>	<p>Amend the text description in the introduction to read as follows (or similar) to acknowledge the presence of the built structures in the West Wind and Mill Creek wind farms:</p> <p>Wellington City's coastline extends for over 100 <u>kilometres</u> kilometers. The western and southern parts of this coastline are largely undeveloped. Narrow shore platforms and steep escarpment and cliff faces are typical along this part of the coastline, where exposure to rigorous environmental conditions has helped shape rugged landforms. <u>Many areas of Wellington's rural coastal environment are largely undeveloped (for example, the west-facing and south-facing escarpments adjacent to Raukawa Moana (Cook's Strait) west of Owiro Bay).</u> <u>Parts of the rural environment above the coastal escarpments have been modified by development (for example, by the establishment of the West Wind and Mill Creek wind farms which now form part of the existing environment).</u> <u>At the same time the</u> <u>The</u> urban areas <u>of the coastal environment</u> have been heavily modified, with public roads present nearly the entire length of the coastline around the harbour from Sinclair Head to</p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
				Petone, with and residential and commercial development having modified the natural character throughout this area.
CE Coastal Environment Objective CE-O1	<p>Coastal environment The natural character and qualities that contribute to the natural character within the landward extent of the coastal environment are maintained and, where appropriate, restored or enhanced.</p> <p>The landward extent of the coastal environment is mapped on the GIS maps and does include some existing West Wind (but not Mill Creek) turbines. All of the existing turbines form part of the background to the mapped coastal environment though.</p>	Oppose in part	<p>Together with the description of the natural character of the coastal environment along Raukawa Moana in Schedule SCHED10, Objective CE-O1 fails to acknowledge the presence of the existing modifications (including buildings and structures) made by the West Wind and Mill Creek wind farms. Amendments to more accurately describe the modified natural character of these parts of the coastal environment need to be made in SCHED10, in the description of the coastal environment in Chapter CE Coastal Environment and in the objectives of Chapter CE Coastal Environment, including CE-O1.</p>	<p>Amend Objective CE-O1 to read as follows (or similar) to acknowledge the presence of the built structures in the West Wind and Mill Creek wind farms:</p> <p>Coastal environment The natural character and qualities that contribute to the natural character within the landward extent of the coastal environment are maintained and, where appropriate, restored or enhanced, <u>recognising the presence of existing renewable electricity generation activities and the importance of the renewable electricity generation resource in the coastal environment.</u></p> <p>In the alternative insert, either into Chapter CE Coastal Environment or Chapter REG Renewable Electricity Generation, a new separate objective that acknowledges the presence of and recognises the benefits of the existing wind farms within the coastal environment and within the backdrop to the mapped coastal environment as follows (or similar to achieve the same outcome):</p> <p><u>Objective [XX-O1]:</u></p> <p><u>The benefits of the existing wind farms along Wellington's coastline are recognised and their generation capacity is optimised.</u></p>

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Objective CE-O2	<p>High coastal natural character areas</p> <p>The identified characteristics and values of areas of high coastal natural character areas in the landward extent of the coastal environment are preserved and protected from inappropriate subdivision, use and development.</p>	Support in part	<p>These are identified in Schedule SCHED12 as 'high' and 'very high'. There are no West Wind or Mill Creek wind farm turbines within the mapped overlays of 'high' or 'very high' coastal natural character but the wind farm structures are part of the visible backdrop to these 'high coastal natural character areas'. The presence of these visible large structures needs to be acknowledged as existing and should not be considered inappropriate development. The focus of Objective CE-O2 should be on avoiding inappropriate subdivision, use and development within the mapped 'high coastal natural character areas'.</p>	<p>Amend Objective CE-O2 in the following manner (or similar) or otherwise amend the Chapter CE Coastal Environment objectives to acknowledge and recognise the existing West Wind and Mill Creek wind farms as legitimate, authorised and appropriate existing development established within the backdrop to areas of identified 'high coastal natural character':</p> <p>High coastal natural character areas</p> <p>The identified characteristics and values of areas of high coastal natural character areas in the landward extent of the coastal environment are preserved and protected from inappropriate subdivision, use and development <u>occurring within the mapped high coastal natural character areas.</u></p>
Policy CE-P2	<p>Use and development</p> <p>Provide for use and development in the landward extent of the coastal environment where it:</p> <ol style="list-style-type: none"> 1. Consolidates existing urban areas; and 2. Does not establish new urban sprawl along the coastline. 	Oppose in part	<p>In the absence of any explicit recognition of the presence of the West Wind and Mill Creek wind farms, Policy CE-P2 could be applied in a manner that restricts appropriate upgrading of those wind farms or the establishment of replacement wind turbines in appropriate locations.</p>	<p>Amend Policy CE-P2 to provide for the existing wind farms along Wellington's coastline and provide for upgrading within those wind farms, including by the placement of replacement wind turbines, by inserting the following (or similar) text:</p> <p>Use and development</p> <p>Provide for use and development in the landward extent of the coastal environment where it:</p> <ol style="list-style-type: none"> 1. Consolidates existing urban areas; <u>or</u> 2. <u>Is necessary to enable the use, development, maintenance and upgrading of regionally significant infrastructure (including the repowering of existing wind farms by replacing and upgrading existing turbines and</u>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
				<p><u>their support structures identified on the Plan Maps and associated electricity transmission facilities</u>); and</p> <p>3. Does not establish new urban sprawl along the coastline;_i</p>
Policy CE-P5	<p>Use and development in high coastal natural character areas</p> <p>Only allow use and development in high coastal natural character areas in the coastal environment where: ...</p>	Support in part	<p>The 'or' in the preamble to Policy CE-P5 should probably be 'and' to capture all areas of 'high coastal natural character'. Although the mapped extent of 'high coastal natural character areas' currently avoids the footprint of turbines and associated facilities within the West Wind and Mill Creek wind farms, Meridian seeks to ensure that any earthworks or other activities associated with any future upgrading or repowering of turbines within these wind farms is not unduly restricted. Importantly, Policy CE-P5 applies to development within mapped areas of 'high coastal natural character'. The last clause (f) of Policy CE-P5 assumes that rehabilitation planting will always be appropriate or relevant for natural character. It may not be. Indeed, in some situations (such as rock faces) planting may conflict with the significant natural character values. In any event, Chapter ECO Ecosystems and Indigenous Biodiversity includes a mitigation hierarchy which can address the need (or not) for rehabilitation planting. Clause (f) is not necessary and should be deleted.</p>	<p>Either retain the current wording of Policy CE-P5 (which applies only to use and development within mapped areas of 'high coastal natural character') or insert the following (or similar) text:</p> <p>Use and development in areas of very high or high coastal natural character</p> <p><i>Provide for use and development in areas of very high or and high coastal natural character in the coastal environment where:</i></p> <ol style="list-style-type: none"> 1. Any-s Significant adverse effects on the identified values described in SCHED13 are avoided and any other adverse effects on the identified values described in SCHED13 are avoided, remedied or mitigated; and 2. It can be demonstrated that: <ol style="list-style-type: none"> a. The particular values and characteristics of the areas of very high or high coastal natural character as identified in SCHED13 are protected from inappropriate use and development, considering the extent to which the values and characteristics of the area are vulnerable to change including the effects of climate change and other natural processes;

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
				<p>b. Any proposed earthworks, building platforms and buildings or structures are of a scale and prominence that respects the identified values and the design and development integrates with the existing landform and dominant character of the area, <u>recognising the functional and operational needs of renewable electricity generation activities</u>;</p> <p>c. There is a functional or operational need for the activity to locate in the area; or</p> <p>d. The duration and nature of adverse effects are limited;</p> <p>e. <u>The use and development will upgrade, repower or replace existing renewable electricity generation assets and enable more effective use of natural resources for renewable electricity generation</u>;</p> <p>f. There are no reasonably <u>practicable</u> practical alternative locations that are outside of the coastal environment or are less vulnerable to change; and</p> <p>g. Restoration or rehabilitation planting of indigenous species will be incorporated to mitigate any adverse effects.</p>
Policy CE-P8	<p><i>Vegetation removal within the coastal environment</i></p> <p><i>Manage the removal of vegetation in the coastal environment as follows: ...</i></p>	Support in part	Policy CE-P8 is potentially restrictive of vegetation removal that is necessary to support regionally significant infrastructure and needs to be amended to recognise and provide for the particular operational and functional needs of regionally significant infrastructure.	<p>Amend Policy CE-P8 by inserting the following (or similar) text)</p> <p>Vegetation removal in the coastal environment</p> <p><i>Manage the removal of vegetation in the coastal environment as follows:</i></p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
				<ol style="list-style-type: none"> 1. Allow for the removal of vegetation in the coastal environment outside of areas of very high or high coastal natural character. 2. Allow for the removal of exotic vegetation in the coastal environment within areas of very high or high coastal natural character. 3. Only allow for the removal of indigenous vegetation in the coastal environment within areas of very high or high coastal natural character that: <ol style="list-style-type: none"> a. Is of a scale that maintains the identified values; or b. Is associated with ongoing maintenance of existing public accessways; <u>or</u> c. <u>Is necessary to enable the operation, maintenance, repair or upgrading of regionally significant infrastructure.</u>
Policy CE-P10	<p>No change:</p> <p><i>Inappropriate activities in the coastal environment</i></p> <p><i>Avoid the establishment of inappropriate activities within the coastal environment.</i></p>	Oppose	<p>Policy CE-P10 provides no guidance on what is considered 'inappropriate' in the coastal environment. This submission point is not saying that inappropriate activities should be allowed in the coastal environment. Rather, the point is that there is already sufficient useful guidance in other policies about what is considered inappropriate. Policy CE-P10 adds no value and should be deleted.</p>	<p>Delete Policy CE-P10:</p> <p><i>Inappropriate activities in the coastal environment</i></p> <p><i>Avoid the establishment of inappropriate activities within the coastal environment.</i></p>

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<p>CE Coastal Environment</p> <p>Rules – Land Use Activities</p>	<p>The Introduction to the chapter contains the following note under the heading 'Other relevant District Plan provisions': Renewable - Provisions relating to renewable electricity generation in the coastal environment are located in the Renewable Electricity Generation Chapter.</p> <p>Resource consent may therefore be required under rules in this chapter as well as other chapters. Unless specifically stated in a rule or in this chapter, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.</p>	<p>Oppose in part</p>	<p>Meridian understood the intention of the Plan to be that the rules for renewable electricity generation activities, structures and buildings would be wholly contained in the REG chapter. Meridian supports this approach. The note in the preamble is not entirely helpful in clarifying this. Meridian accepts that the objectives and policies of the CE Coastal Environment chapter are applicable to applications for consent for renewable electricity generation activities in the coastal environment. However, the standards listed for activities in the coastal environment are entirely inappropriate for renewable electricity generation activities and structures and should not be construed as a 'permitted baseline' for renewable electricity generation activities there, and particularly not for existing wind farms. The preamble in Chapter CE Coastal Environment should be amended to make it clear that its rules do not apply to renewable electricity generation activities.</p>	<p>Insert into the Introduction to Chapter CE Coastal Environment Rules, under the heading 'Other relevant District Plan provisions', the following (or similar) clarification note:</p> <p><u>The rules applicable to renewable electricity generation activities in the coastal environment, including in areas of high and very high coastal natural character, are contained in Chapter REG Renewable Electricity Generation. The rules in Chapter CE Coastal Environment do not apply to renewable electricity generation activities in the coastal environment, including in areas of high and very high coastal natural character in the coastal environment.</u></p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
INF-CE Infrastructure Coastal Environment				
INF-CE Infrastructure Coastal Environment Introduction	<p>The Introduction to the chapter contains the following text:</p> <p>Introduction This sub-chapter applies to infrastructure within the Coastal Environment. It applies in addition to the principal Infrastructure chapter.</p> <p>Note: The objectives of the Infrastructure chapter apply. ...</p>	Oppose in part	<p>The expression 'infrastructure' potentially captures regionally significant infrastructure, including renewable electricity generation activities. Meridian understood the intention of the Plan to be that the rules for renewable electricity generation activities, structures and buildings would be wholly contained in the REG chapter. Meridian supports this approach. The note in the preamble is not entirely helpful in clarifying this in relation to regionally significant infrastructure such as renewable electricity generation activities. The standards listed for general infrastructure activities in the coastal environment are entirely inappropriate for renewable electricity generation activities and structures and should not be construed as a 'permitted baseline' for renewable electricity generation activities there, and particularly not for existing wind farms. The preamble in Chapter INF-CE Infrastructure Coastal Environment should be amended to make it clear that its rules do not apply to renewable electricity generation activities.</p>	<p>Insert into the Introduction to Chapter INF-CE Infrastructure Coastal Environment Rules the following (or similar) clarification note:</p> <p><u>The rules applicable to renewable electricity generation activities in the coastal environment, including in areas of high and very high coastal natural character, are contained in Chapter REG Renewable Electricity Generation. The rules in Chapter INF-CE Infrastructure Coastal Environment do not apply to renewable electricity generation activities in the coastal environment, including in areas of high and very high coastal natural character in the coastal environment.</u></p>

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INF-ECO Infrastructure Ecosystems and Indigenous Biodiversity				
INF-ECO Infrastructure Ecosystems and Indigenous Biodiversity Introduction	The Introduction to the INF-ECO chapter includes, under the heading 'Other relevant District Plan provisions', a statement that seeks to clarify the interaction between the INF-ECO chapter and other Plan chapters.	Oppose in part	<p>Meridian understood the intention of the Plan to be that the rules for renewable electricity generation activities, structures and buildings would be wholly contained in the REG chapter. Meridian supports this approach. The note in the preamble is not entirely helpful in clarifying this. Meridian accepts that the objectives and policies of the ECO Ecosystems and Indigenous Biodiversity chapter are applicable to renewable electricity generation activities. However, the standards listed for general infrastructure activities in the INF-ECO chapter are entirely inappropriate for renewable electricity generation activities and structures and should not be construed as a 'permitted baseline' for renewable electricity generation activities there, and particularly not for existing wind farms. The preamble in Chapter INF-ECO Infrastructure Ecosystems and Indigenous Biodiversity should be amended to make it clear that its rules do not apply to renewable electricity generation activities.</p>	<p>Insert into the Introduction to Chapter INF-ECO Infrastructure Coastal Environment Rules, under the heading 'Other relevant District Plan provisions', the following (or similar) clarification note:</p> <p><u>The rules applicable to renewable electricity generation activities are contained in Chapter REG Renewable Electricity Generation. The rules in Chapter INF-ECO Infrastructure Ecosystems and Indigenous Biodiversity do not apply to renewable electricity generation activities.</u></p>

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INF-NFL Infrastructure Natural Features and Landscapes				
INF-NFL Infrastructure Natural Features and Landscapes Introduction	The Introduction to the INF-NFL chapter includes, under the heading 'Other relevant District Plan provisions', a statement that seeks to clarify the interaction between the INF-NFL chapter and other Plan chapters.	Oppose in part	Meridian understood the intention of the Plan to be that the rules for renewable electricity generation activities, structures and buildings would be wholly contained in the REG chapter. Meridian supports this approach. The note in the preamble is not entirely helpful in clarifying this. Meridian accepts that the objectives and policies of the NFL Natural Features and Landscapes chapter are applicable to renewable electricity generation activities. However, the standards listed for general infrastructure activities in the INF-NFL chapter are entirely inappropriate for renewable electricity generation activities and structures and should not be construed as a 'permitted baseline' for renewable electricity generation activities there, and particularly not for existing wind farms. The preamble in Chapter INF-NFL Infrastructure Natural Features and Landscapes should be amended to make it clear that its rules do not apply to renewable electricity generation activities.	<p>Insert into the preamble to Chapter INF-ECO Infrastructure Coastal Environment Rules, under the heading 'Other relevant District Plan provisions', the following (or similar) clarification note:</p> <p><u>The rules applicable to renewable electricity generation activities in the coastal environment are contained in Chapter REG Renewable Electricity Generation. The rules in Chapter INF-NFL Natural Features and Landscapes do not apply to renewable electricity generation activities.</u></p>

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ECO ECOSYSTEMS AND INDIGENOUS BIODIVERSITY				
Objective ECO-01	<i>Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored.</i>	Support in part	It is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Amend Objective ECO-01 as follows: <u>The ecological and indigenous biodiversity values of</u> Significant Natural Areas are protected from inappropriate subdivision, use and development and where appropriate, restored.
Objective ECO-02	<i>Significant Natural Areas within the coastal environment are protected.</i>	Support in part	It is the values of Significant Natural Areas that should be protected, not the geographic areas they occupy.	Amend Objective ECO-02 as follows: <u>The ecological and indigenous biodiversity values of</u> Significant Natural Areas within the coastal environment are protected
Policy ECO-P1	Protection of significant natural areas Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to: ...	Oppose in part	The mitigation hierarchy created by Policy ECO-P1 should focus biodiversity and compensation initiatives at adverse effects that are more than minor (not all residual adverse effects). The word 'only' in clauses 4 and 5 is unnecessary because the circumstances when biodiversity offsetting and biodiversity compensation will be considered are set out in APP2 and APP3. The word 'only' adds no value to the principles in APP2 and APP3.	Amend Policy ECO-P1 as follows (or in a similar way to address the submission point): Protection of significant natural areas Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to: <ol style="list-style-type: none"> 1. Avoid adverse effects on indigenous biodiversity values where practicable; 2. Minimise adverse effects on the biodiversity values where avoidance is not practicable;

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				<p>3. <u>Where practicable, remedy Remedy adverse effects on the biodiversity values where they cannot be avoided or minimised;</u></p> <p>4. <u>Where residual adverse effects cannot be avoided, mitigated or remedied. Only consider biodiversity offsetting for any residual adverse effects that are more than minor cannot otherwise be avoided, minimised or remedied and where the principles of APP2 – Biodiversity Offsetting are met; and</u></p> <p>5. <u>Only If biodiversity offsetting of more than minor residual adverse effects is not practicable, consider biodiversity compensation after first considering biodiversity offsetting and where the principles of APP3 – Biodiversity Compensation are met.</u></p>
Policy ECO-P2	<p>Appropriate vegetation removal in significant natural areas</p> <p>Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for:</p>	Support in part	<p>Removal of vegetation may also be appropriate where necessary to provide for the functional or operational needs of regionally significant infrastructure, including vegetation removal from around structures.</p>	<p>Amend Policy ECO-P2 to provide for the functional and operational needs of regionally significant infrastructure as follows (or similar):</p> <p>Appropriate vegetation removal in significant natural areas</p> <p>Enable vegetation removal within significant natural areas identified within SCHED8 where it is of a scale and nature that maintains the biodiversity values, including to provide for:</p>

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	<ol style="list-style-type: none"> Maintenance around existing buildings; or Safe operation of roads, tracks and access ways; or Restoration and conservation activities including plant and animal pest control activities; or ... 			<ol style="list-style-type: none"> Maintenance around existing buildings and structures; or Safe operation of roads, tracks and access ways; or <u>Functional or operational needs in operating, maintaining, repairing, or upgrading regionally significant infrastructure; or</u> ...
Policy ECO-P3	Subdivision, use and development in significant natural areas	Support	Policy ECO-P3 gives effect to the objectives.	Retain Policy ECO-P3.
Policy ECO-P4	Protection and restoration initiatives	Support in part	Meridian supports Policy ECO-P4, provided the amendments requested to the mitigation hierarchy in Policy ECO-P1 are adopted.	Retain Policy ECO-P4, together with the amendments requested above to Policy ECO-P1.
Policy ECO-P5	Significant natural areas within the coastal environment Only allow activities within an identified significant natural area within <u>SCHED8</u> in the coastal environment where it can be demonstrated that they:	Support in part	Policy ECO-P5 gives effect to the NZCPS. There is a minor editorial amendment required in clause 3 and there appears to be an error in the reference to Policy ECO-P2. It may be that this should be 'ECO-P1' (i.e. the mitigation hierarchy).	Amend Policy ECO-P5 as follows (or similar): Significant natural areas within the coastal environment Only allow activities within an identified significant natural area within <u>SCHED8</u> in the coastal environment where it can be demonstrated that they; <ol style="list-style-type: none"> Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy

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				<p>Statement 2010;</p> <ol style="list-style-type: none"> Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the matters in Policy 11(b) of the New Zealand Coastal Policy Statement 2010; and Protects the other indigenous biodiversity values in accordance with ECO-P1 ECO-P2.
APP2 Biodiversity Offsetting	Biodiversity Offsetting	Support in part	<p>The Plan includes the defined term 'biodiversity offsetting' so the Appendix should use consistent language. The reference to Policy ECO-P2 may be incorrect. The management hierarchy is actually set out in Policy ECO-P1. The policy framework and APP2 should apply biodiversity offsetting to residual adverse effects that are more than minor. Some amendments are appropriate to align APP2 to the approach adopted in the Proposed Natural Resources Plan. Clarification of the expression 'trading up' is required.</p>	<p>Amend APP2 in the following (or similar) way and include a definition of or clarification of the meaning of 'trading up' used in APP2:</p> <p>Biodiversity Offsetting The following sets out a framework of principles for the use of biodiversity offsetting. Principles must be complied with for an action to qualify as a biodiversity offset. These principles will be used when assessing the adequacy of proposals for the design and implementation of offsetting as part of resource consent applications.</p> <ol style="list-style-type: none"> Adherence to the effects management hierarchy: The proposed biodiversity offset will be assessed in accordance with the management hierarchy set out in ECO-P1, ECO-P2. It should only be contemplated after the management hierarchy steps in ECO-P1 ECO-P2 have been demonstrated to have been sequentially exhausted. Any proposal for a biodiversity offset will demonstrate how it addresses the more than minor residual adverse effects of the activity.

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				<p>2. Limits to offsetting: Many biodiversity values cannot be offset and if they are adversely affected then they will be permanently lost. These situations include where:</p> <ul style="list-style-type: none"> a. Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected or there is no appropriate offset site; b. There are no technically feasible or socially acceptable options or no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset options by which to secure gains within acceptable timeframes; and c. Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse. <p>...</p>
APP3 Biodiversity Compensation	Biodiversity Compensation	Support in part	The reference to Policy ECO-P2 may be incorrect. The management hierarchy is actually set out in Policy ECO-P1. The policy framework and APP3 should allow consideration of biodiversity compensation where necessary to address residual adverse effects that are more than minor. Some amendments are appropriate to align APP3 to the approach adopted in the Proposed Natural Resources Plan.	<p>Amend APP3 in the following (or similar) way and include a definition of or clarification of the meaning of 'trading up' used in APP3:</p> <p>Biodiversity Compensation The following sets out a framework of principles for the use of biodiversity compensation. Principles must be complied with for an action to qualify as biodiversity compensation.</p>

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			Clarification of the expression 'trading up' is required.	<p>1. Adherence to effects management hierarchy: Biodiversity compensation is a commitment to redress residual adverse effects <u>that are more than minor</u>. It must only be contemplated after the management hierarchy steps in <u>ECO-P1 ECO-P2</u> have been demonstrated to have been sequentially exhausted and thus applies only to residual adverse effects on indigenous biodiversity <u>that are more than minor</u>.</p> <p>2. Limits to biodiversity compensation: In deciding whether biodiversity compensation is appropriate, a decision-maker must consider the principle that many indigenous biodiversity values are not able to be compensated for because:</p> <ol style="list-style-type: none"> The indigenous biodiversity affected is irreplaceable or vulnerable; There are no technically feasible or socially acceptable options or <u>no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offsetoptions</u> by which to secure gains within acceptable timeframes; and ...

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Part 1 Interpretation		Definitions		
'Community Scale Renewable Electricity Generation Activity'	Means systems or equipment that generate electricity from renewable sources for the purpose of supplying electricity to a group of individuals, an immediate community, or exporting back into the distribution network.	Support	The definition gives effect to the NPS-REG.	Retain the definition of 'Community Scale Renewable Electricity Generation'.
'Functional Need'	Means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.	Support	The definition matches the definition in the National Planning Standards.	Retain the definition of 'Functional Need'.
'Large Scale Renewable Electricity Generation Activity'	Means the land, buildings, substations, wind turbines, structures, underground cabling earthworks, access tracks and roads, paved areas, internal transmission and fibre networks, ancillary facilities and site rehabilitation works associated with the generation of electricity from a renewable energy source and the operation of the renewable electricity generation activity greater for the purpose of exporting electricity directly into the distribution or transmission network. ...	Support	The definition accurately captures the facilities and activities typically included in or associated with large scale renewable electricity generation activities such as wind farms.	Retain the definition of 'Large Scale Renewable Electricity Generation Activities'.

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'Operational Need'	Means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.	Support	The definition matches the definition in the National Planning Standards.	Retain the definition of 'Operational Need'.
'Regionally Significant Infrastructure'	Means regionally significant infrastructure including: a. pipelines ... b. ... c. the National Grid; d. facilities for the generation and/or transmission of electricity where it is supplied to the National Grid and/or the local distribution network; e. ...	Support	The definition matches the definition in the Proposed Natural Resources Plan (following settlement of appeals) and the proposed RPS Change #1 and is supported by the regional community.	Retain the definition of 'Regionally Significant Infrastructure'.
'Renewable Electricity Generation'	Means the construction, operation, maintenance and repair, and upgrading of structures, paved areas and ancillary facilities associated with renewable electricity generation. This includes small scale, community scale and large scale renewable electricity generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the National Grid and electricity storage technologies associated with renewable electricity.	Support	The definition accurately captures the facilities and activities typically included in or associated with renewable electricity generation activities.	Retain the definition of 'Renewable Electricity Generation'.

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'Renewable Electricity Generation Investigation Activity'	Means structures or equipment for the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation by existing and prospective generators and includes the following activities: ...	Support	The definition accurately captures the facilities and activities typically included in or associated with renewable electricity generation investigation activities.	Retain the definition of 'Renewable Electricity Generation Investigation Activity'.
'Reverse Sensitivity'	Means the potential for the operation of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived environmental effects generated by the existing activity.	Support	The definition accurately describes the concept of reverse sensitivity and will be helpful to users of the Plan.	Retain the definition of 'Reverse Sensitivity'.
'Sensitive Activity'	Means any: <ul style="list-style-type: none"> a. residential activity; b. marae/papakāinga; c. hospital; d. healthcare facility; e. educational facility; f. retirement village; g. visitor accommodation; or h. place of worship. 	Support	The definition accurately identifies land use activities that are sensitive to adverse amenity effects including noise.	Retain the definition of 'Sensitive Activity'.
'Small Scale Renewable Electricity'	Means systems or equipment that generates electricity from renewable sources for the purpose of using electricity on a particular site (single	Support	The definition gives effect to the NPS-REG.	Retain the definition of 'Small Scale Renewable Electricity Generation Activity'.

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Generation Activity'	household, business premise or network utility) with or without exporting back into the distribution network and produce less than 20kW.			
'Upgrading'	As it applies to infrastructure, means the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure, but excludes maintenance, repair and renewal.	Support	The definition accurately describes the scope of upgrading activities anticipated for infrastructure (including of renewable electricity generation activities) but would be improved by referring also to upgraded 'output' (e.g. from the replacement of turbines with those having greater efficiency or power output).	Amend the definition of 'Upgrading' as follows: As it applies to infrastructure, means the improvement or increase in carrying capacity or output , operational efficiency, security or safety of existing infrastructure, but excludes maintenance, repair and renewal.
'Wind Farm'	Means wind turbines (and support pylons or towers) used to generate electricity from the wind which is then conveyed to the distribution network or National Grid. It includes ancillary access roads and tracks, buildings and structures (including substations, communications equipment, electricity storage technologies, and the system of electricity conveyance required to convey the electricity to an associated substation.	Support in part	The definition includes most of the activities typically within or associated with a wind farm but would be improved by clarifying that it also includes lines required to convey the electricity to the distribution network or National Grid'.	Amend the definition of 'Wind Farm' by inserting reference to transmission lines: means wind turbines (and support pylons or towers) used to generate electricity from the wind which is then conveyed to the distribution network or National Grid. It includes ancillary access roads and tracks, buildings and structures (including substations, transmission lines and poles/supporting structures), communications equipment, electricity storage technologies, and the system of electricity conveyance required to convey the electricity to an associated substation.

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REG RENEWABLE ELECTRICITY GENERATION				
REG Objective REG-O1	Benefits of renewable energy use and development	Support	The objective gives effect to the NPS-REG and the Plan's Strategic Objectives. Importantly, Objective REG-O1 promotes an increase in renewable electricity generation.	Retain Objective REG-O1.
REG Objective REG-O2	Adverse effects of renewable electricity generation activities The actual and potential adverse effects on the environment and communities of the investigation, development, operation, maintenance and repair, and upgrading of renewable electricity generation activities are effectively managed, while recognising the functional needs and operational needs of renewable electricity generation activities and the potential national benefits.	Support in part	Meridian supports the outcome sought by Objective REG-O2 but suggests the wording might be improved by deleting some superfluous words.	Amend Objective REG-O2 as follows: Adverse effects of renewable electricity generation activities The actual and potential adverse effects on the environment and communities of the investigation, development, operation, maintenance and repair, and upgrading of renewable electricity generation activities are effectively managed, while recognising the functional needs and operational needs of renewable electricity-generation activities and the potential national benefits.
REG Objective REG-O3	Adverse effects on renewable electricity generation activities The efficient operation, maintenance and repair, and upgrading of renewable electricity generation activities are not constrained or compromised by effects caused by	Support	The objective is important for maintaining the operability and efficiency of existing renewable electricity generation activities.	Retain Objective REG-O3.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	other activities, including reverse sensitivity effects.			
REG Policy REG-P1	<p>Recognising the significance and benefits of the use and development of renewable energy</p> <p>Recognise the national significance and the local, regional and national benefits of the use and development of renewable energy sources and renewable electricity generation activities, including: ...</p>	Support	Policy REG-P1 is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.	Retain Policy REG-P1.
REG Policy REG-P2	<p>Providing for renewable electricity generation activities</p> <p>When making decisions on the investigation, development, operation, maintenance and repair, and upgrading of renewable electricity generation activities: ...</p>	Support	Policy REG-P2 is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.	Retain Policy REG-P2.
REG Policy REG-P3	<p>Renewable electricity generation investigation activities</p> <p>1. Enable renewable electricity generation investigation activities in areas outside Overlays, high coastal natural character areas, and coastal margins and riparian margins in</p>	Support	Provision for renewable electricity generation investigation activities in all areas is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.	Retain Policy REG-P3.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	<p>the coastal environment, where adverse effects are minimised.</p> <p>2. Allow renewable electricity generation investigation activities within Overlays, high coastal natural character areas, and coastal margins and riparian margins in the coastal environment, where: ...</p>			
REG Policy REG-P4	<p>Small scale renewable electricity generation outside Overlays, high coastal natural character areas, and coastal and riparian margins</p> <p>Enable small scale renewable electricity generation activities, including within the coastal environment, where: ...</p>	Support	Provision for all scales of renewable electricity generation in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives.	Retain Policy REG-P4.
REG Policy REG-P5	<p>Small-scale renewable electricity generation activities within Overlays, high coastal natural character areas, and coastal and riparian margins</p> <p>Allow small scale renewable electricity generation activities within Overlays, high coastal natural character areas, or coastal margins</p>	Support	Provision for all scales of renewable electricity generation in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives.	Retain Policy REG-P5.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	and riparian margins within the coastal environment, where: ...			
REG Policy REG-P6	<p>Community scale renewable electricity generation activities in the General Rural Zone, General Industrial and Airport Zones, outside Overlays, high coastal natural character areas, and coastal and riparian margins</p> <p>Provide for community scale renewable electricity generation activities in the General Rural Zone, General Industrial Zone and Airport Zone, including within the coastal environment, where: ...</p>	Support	Provision for all scales of renewable electricity generation in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives.	Retain Policy REG-P6.
REG Policy REG-P7	<p>Community-scale renewable electricity generation activities within other zones, locations and Overlays</p> <p>Only allow community-scale renewable energy generation activities in other zones, locations and Overlays where: ...</p>	Support in part	Provision for all scales of renewable electricity generation in all areas is necessary to give effect to the NPS-REG and to the Plan's REG and Strategic objectives. For consistency with Policy REG-P6, the words 'Only allow' should be amended to 'Provide for'. The list of circumstances given in the policy defines the situations where community-scale renewable electricity generation will be allowed. The expression 'energy' should be replaced with 'electricity' which is the Plan's defined term.	<p>Amend Policy REG-P7 as follows (or similar):</p> <p>Community-scale renewable electricity generation activities within other zones, locations and Overlays</p> <p>Only allow <u>Provide for</u> community-scale renewable <u>energy electricity</u> generation activities in other zones, locations and Overlays where: ...</p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
REG Policy REG-P8	<p>Upgrading existing large scale renewable electricity generation activities</p> <p>Provide for the upgrading of existing large scale renewable electricity generation activities, including replacing or upgrading wind turbines and their support structures and ancillary facilities within existing wind farms, where the activity:</p>	Support in part	Meridian supports in principle the approach of Policy REG-P8 in providing for upgrading. In any assessment of the effects of upgrading, it is important that the existing environment (as modified by the presence of the existing renewable electricity generation activity) is the baseline for assessment.	<p>Amend Policy REG-P8 as follows or similar:</p> <p>Upgrading existing large scale renewable electricity generation activities</p> <p>Provide for the upgrading of existing large scale renewable electricity generation activities, including replacing or upgrading wind turbines and their support structures and ancillary facilities within existing wind farms, where the activity:</p> <ol style="list-style-type: none"> 1. Avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on the identified values of any Overlay or any adjacent Overlay, high coastal natural character area, or coastal margin or riparian margin in the coastal environment, recognising the character of the existing environment; 2. Has a functional need or operational need for its location; and 3. Minimises adverse effects, including adverse cumulative effects, on: ...
REG Policy REG-P9	<p>New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins</p> <p>Provide for new large scale renewable electricity generation activities in the General Rural Zone,</p>	Oppose	Meridian supports provision for large scale renewable electricity generation activities throughout the General Rural Zone, including within overlay areas.	<p>Either:</p> <p>Delete from Policy REG-P9 the restriction on location within overlay and coastal natural character areas as follows (or similar) and re-number the clauses sequentially:</p> <p>New large scale renewable electricity generation activities in the General Rural Zone outside Overlays, high coastal natural character areas, and coastal and riparian margins</p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	<p>including within the coastal environment, where:</p> <ol style="list-style-type: none"> They are located outside: <ol style="list-style-type: none"> Overlays (other than ridgelines and hilltops, and low and medium hazard areas within the Hazard Overlays); High coastal natural character areas identified in <u>SCHED12</u>; and Coastal margins and riparian margins within the coastal environment; They have an operational need or functional need to locate where the renewable energy resources are available; ... 			<p>Provide for new large scale renewable electricity generation activities in the General Rural Zone, including within the coastal environment, where:</p> <p>1. They are located outside:</p> <ol style="list-style-type: none"> Overlays (other than ridgelines and hilltops, and low and medium hazard areas within the Hazard Overlays); High coastal natural character areas identified in <u>SCHED12</u>; and Coastal margins and riparian margins within the coastal environment; <p>1. They have an operational need or functional need to locate where the renewable energy resources are available; ...</p> <p>Or replace Policy REG-P9 with the amended Policy REG-P10 proposed below:</p> <p><u>Replacement Policy REG-P10:</u></p> <p><u>New Large scale renewable electricity generation activities in the General Rural</u></p> <p><u>Enable new large scale renewable electricity generation activities in the General Rural Zone including within the coastal environment, areas of Very High and High Coastal Natural Character where:</u></p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
				<ol style="list-style-type: none"> 1. <u>significant adverse effects on coastal natural character and the values of Overlay areas and riparian margins are avoided; and</u> 2. <u>other adverse effects on coastal character, the values of Overlay areas and riparian margins are minimised, recognising the functional needs and operational needs of renewable electricity generation activities.</u>
REG Policy REG-P10	<p>New large-scale renewable electricity generation activities in other zones, locations and Overlays</p> <p>Avoid locating new large scale renewable electricity generation activities within:</p> <ol style="list-style-type: none"> 1. Any zone, other than the General Rural Zone; 2. Any Overlay, other than ridgelines and hilltops, and low and medium hazard areas within the Hazard Overlays; 3. High coastal natural character areas identified in <u>SCHED12</u>; and 4. Any coastal margins and riparian margins within the coastal environment. 	Oppose	<p>Meridian seeks discretionary activity provision for large-scale renewable electricity generation activities in all parts of the General Rural Zone.</p>	<p>Either:</p> <p>Delete Policy REG-P10; or</p> <p>Replace Policy REG-P10 with an enabling policy as follows (or similar wording to achieve the outcome of provision for large scale renewable electricity activities throughout the General Rural Zone):</p> <p><u>New Large scale renewable electricity generation activities in the General Rural</u></p> <p><u>Enable new large scale renewable electricity generation activities in the General Rural Zone including within the coastal environment, areas of Very High and High Coastal Natural Character where:</u></p> <ol style="list-style-type: none"> 1. <u>significant adverse effects on coastal natural character and the values of Overlay areas and riparian margins are avoided; and</u> 2. <u>other adverse effects on coastal character, the values of Overlay areas and riparian margins</u>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
				<u>are minimised, recognising the functional needs and operational needs of renewable electricity generation activities.</u>
REG Policy REG-P11	<p>Upgrading existing renewable electricity generation activities and providing for technological advances</p> <p>Recognise the benefits of upgrading of existing renewable electricity generation activities, including the adoption of new and updated technologies and the repowering of existing wind turbines, where the upgrading or repowering activity:</p>	Support in part	Policy REG-P8 also provides for the upgrading of existing renewable electricity generation activities. Meridian supports the matters for consideration listed in Policies REG-P8 (including the amendment suggested by Meridian above) and REG-P11. It may be more efficient to combine Policies REG-P8 and REG-P11. At the least, the two policies should be placed together within the Plan.	Place Policies REG-P8 and REG-P11 together or combine them, ensuring that all of the matters listed in each is retained.
REG Policy REG-P12	<p>Reverse sensitivity effects</p> <p>Require new sensitive activities to be designed, located and undertaken to avoid conflict with, including reverse sensitivity effects on, existing renewable electricity generation activities.</p>	Support	Policy REG-P12 is necessary to give effect to the NPS-REG and the Plan's REG and Strategic objectives.	Retain Policy REG-P12.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
REG RULES				
REG-R1	REG-R1.1: Maintenance and repair of existing renewable electricity generation activities Permitted activity	Neither support nor oppose	Meridian questions whether Rule REG-R1 is necessary, because all existing renewable electricity generation activities (certainly existing large scale renewable electricity generation activities) required and have obtained consents and their conditions of consent provide for maintenance and repair. The Plan proposes that community scale and large scale renewable electricity generation activities will all require consents. It is reasonable to expect the terms and conditions of consent to address maintenance and repair.	Revisit the need for Rule REG-R1, particularly in relation to large scale renewable electricity generation activities.
REG-R2 REG-R2.1	Renewable electricity generation investigation activities REG-R2.1: Permitted activity in all zones subject to the earthworks limits and noise limits of the underlying zone (likely the Rural Zone) and standard REG-S3: ...	Support	Meridian supports the permitted activity rule and standards for renewable electricity generation investigation activities and the standards proposed.	Retain Rule REG-R2.1.
REG-R2.2	REG-R2.2: Restricted discretionary activity where the REG-R2.1 standards are not met.	Support	Meridian supports the restricted discretionary activity status and the proposed matters of discretion.	Retain Rule REG-R2.2.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
REG-R2.3	REG-R2.3: Restricted discretionary activity within overlay and scheduled areas.	Support	Meridian supports the restricted discretionary activity status and the proposed matters of discretion.	Retain Rule REG-R2.3.
REG-R4 and Standard REG-S8	Community scale renewable electricity generation activities REG-R4.1: Restricted discretionary activity subject to standards REG-R4.2: Discretionary activity where standards not met REG-R4.3: Discretionary activity in all other zones REG-R4.4: Discretionary activity in all zones where located within a scheduled area	Support in part	Meridian supports restricted discretionary activity provision for community scale and discretionary activity provision for large scale renewable electricity generation activities in all areas within the General Rural Zone (including within overlay areas). However, the 150m ² limit on the cumulative area of solar panels on a site (in Standard REG-S8) is too small to support meaningful community scale solar electricity generation. For example, if the roof of a medium sized industrial building is used, that may be more in the order of thousands of square metres. There need to be different controls for freestanding solar panels compared with those that will occupy the existing surface of a building. Even for freestanding solar panels, the limit of 150m ² is unduly limiting (15m x 10m).	Retain Rule REG-R4 but amend Standard REG-S8 as follows (or similar to increase the maximum area limit for solar panels): 1. Any structure must not exceed: a. The permitted height in relation to boundary for the underlying Zone; b. The permitted setback standards for the underlying Zone; or c. A maximum height of 6m above ground level; 2. The cumulative area of solar panels on the site must not exceed: a. <u>The horizontal area of the building's roof, where the solar panels are fixed to a building roof; and</u> b. <u>1.500m² where the solar panels are freestanding or fixed to the walls of buildings 450m².</u>
REG-R5 and Standards REG-S9 and REG-S10	Upgrading of existing large scale renewable electricity generation activities REG-R5.1: Restricted discretionary activity subject to standards REG-S9, REG-	Support in part and Oppose in part	Meridian supports in principle the restricted discretionary activity provision for upgrading of large scale renewable electricity generation activities and supports the matters of discretion. Meridian opposes proposed Standards REG-S9 and REG-S10, REG-S9 and	Amend Rule REG-R5.1 by deleting the requirement to comply with Standards REG-S9 and REG-S10; and Delete Standards REG-S9 and REG-S10.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	S10, REG-S11 + compliance with NZS6808:2010		REG-S10 address matters that are addressed already under the relevant standard (NZS6808:2010) which is itself included as a standard in this rule. Also, the matters specified in REG-S9 and REG-S10 are addressed already in Policy REG-P8 and in discretionary matter number 5 (particularly clauses (b) to (d)). These matters will be better considered as discretionary matters rather than as standards where these effects are likely.	
REG-R5.2	REG-R5.2: Discretionary activity in the Rural General Zone and for (only) the Brooklyn Hill Wind Turbine in the Natural Open Space Zone where any REG-R5.1 standard is not met.	Support	Meridian supports discretionary activity as the ultimate 'default' for renewable electricity generation activities that do not meet standards, including throughout the Rural General Zone and in all overlay areas.	Retain Rule REG-R5.2.
REG-R6	New large scale renewable electricity generation activities REG-R6.1: Discretionary activity in General Rural Zone subject to compliance with NZS6808:2010 plus standards REG-S9 and REG-S10. REG-R6.2: Non-complying activity where compliance with the Rule REG-R6.1	Oppose	Meridian supports in principle discretionary activity provision for new large scale renewable electricity generation activities in all areas of the General Rural Zone (including in overlay areas). Non-complying activity status is not necessary or appropriate, particularly in this Plan where the relevant objectives and policies provide clear guidance on the values to be protected and effects to be avoided, remedied or mitigated within overlay areas.	Amend Rule REG-R6.1 by deleting the requirement to comply with Standards REG-S9 and REG-S10; and Delete Standards REG-S9 and REG-S10; and Delete Rule REG-R6.2 and re-number Rule REG-R6.3 as 'REG-R6.2'.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	standards are not met and in any scheduled area. REG-R6.3: Non-complying activity in any other zone.		Meridian opposes proposed Standards REG-S9 and REG-S10. REG-S9 and REG-S10 address matters that are addressed already under the relevant standard (NZS6808:2010) which is itself included as a standard in this rule. Also, the matters specified in REG-S9 and REG-S10 are addressed already in Policy REG-P9. Discretionary activity status will allow these matters to be considered in full where these effects are likely and a standard is not necessary (and may constrain full consideration by creating an inappropriate 'permitted baseline').	
Part 2 District Wide Matters				
INF Infrastructure				
INF Infrastructure Introduction	The introduction to Chapter INF Infrastructure sets out how the various chapters of the Plan interact.	Support in part	The text in the introduction does not clarify that the objectives, policy and rules for renewable electricity generation activities (which are defined as a form of infrastructure and regionally significant infrastructure) are contained in Chapter REG Renewable Electricity Generation. Plan navigation would be improved if this were clarified.	Insert into the Introduction of Chapter INF Infrastructure the following (or similar) clarification note: <u>The objectives, policies and rules applicable to renewable electricity generation activities are contained in Chapter REG Renewable Electricity Generation. The provisions of Chapter INF Infrastructure do not apply to renewable electricity generation activities.</u>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
NFL NATURAL FEATURES AND LANDSCAPES				
NFL Introduction	There is a statement in the Introduction to the NFL chapter explaining the interaction between the NFL Natural Features and Landscapes Chapter and other chapters of the Plan.	Oppose in part	<p>The statement in the preamble does not include existing infrastructure within the <i>ridgeline and hilltops</i> overlay which seems to be captured by Rule NFL-R2. This suggests that existing renewable electricity generation activities within ridgeline and hilltop overlays are intended to be captured by these NFL rules. Meridian understood this was not the intention of this Plan. Meridian prefers the approach whereby all rules for renewable generation activities are contained in the bespoke REG Renewable Electricity Generation chapter. Meridian accepts that the objectives and policies of the NFL chapter apply to renewable electricity generation activities in overlay areas.</p>	<p>Insert into the Introduction to Chapter NFL Natural Features and Landscapes, under the heading 'Other relevant District Plan provisions', the following (or similar) clarification note:</p> <p><u>The rules applicable to renewable electricity generation activities (including in Outstanding Natural Features and Landscapes and Special Amenity Landscapes) are contained in Chapter REG Renewable Electricity Generation. The rules in Chapter NFL Natural Features and Landscapes do not apply to renewable electricity generation activities.</u></p>
Objective NFL-O3	Ridgelines and hilltops The natural green backdrop provided by identified ridgelines and hilltops is maintained.	Oppose	The objective inaccurately characterises the actual character of large areas of ridgelines and hilltops overlays in which wind turbines are located and fails to acknowledge the reality of the existing environment.	Ridgelines and Hilltops The natural-green landscape backdrop provided by identified ridgelines and hilltops is maintained and enhanced , where practicable, <u>enhanced recognising the existence of and the functional and operational needs of regionally significant infrastructure.</u>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
Policy NFL-P2	<p>Use and development within ridge line and hilltops</p> <p>Enable use and development within identified ridge lines and hilltops where:</p> <ol style="list-style-type: none"> 1. The activity is compliant with the underlying zone provisions; and 2. There is a functional or operational need to locate within the ridge line and hilltop area; and 3. Any adverse effects on the visual amenity and landscape values can be mitigated. 	Oppose	<p>Functional and operational needs will not be able to be accommodated (as intended by the Policy) if <u>all</u> adverse effects on visual amenity and landscape values must be avoided (for example, in upgrading existing wind turbines that occupy hilltops because they have a functional need to locate on high points). The policy, as worded, does not reconcile the outcomes intended by clauses 2 and 3.</p>	<p>Amend Policy NFL-P2 as follows (or similar):</p> <p>Enable use and development within identified ridge lines and hilltops where:</p> <ol style="list-style-type: none"> 1. The activity is compliant with the underlying zone provisions; and <u>or</u> 2. <u>Adverse effects on the visual amenity and landscape values of the identified Ridge lines and Hilltops are avoided, remedied or mitigated, recognising the existence of and the functional and operational needs of regionally significant infrastructure. There is a functional or operational need to locate within the ridge line and hilltop area; and</u> 3. <u>Any adverse effects on the visual amenity and landscape values can be mitigated.</u>
Policy NFL-P3	<p>Use and development in special amenity landscapes outside the coastal environment</p> <p>Provide for use and development within special amenity landscapes outside the coastal environment where:</p>	Oppose	<p>The Brooklyn wind turbine is within a special amenity landscape. Policy NFL-P3 fails to recognise and provide for this existing turbine.</p>	<p>Amend Policy NFL-P3 as follows (or similar):</p> <p>Use and development in special amenity landscapes outside the coastal environment</p> <p>Provide for use and development within special amenity landscapes outside the coastal environment where:</p> <ol style="list-style-type: none"> 1. <u>Necessary to support the functional and operational needs of the Brooklyn Turbine; or</u>

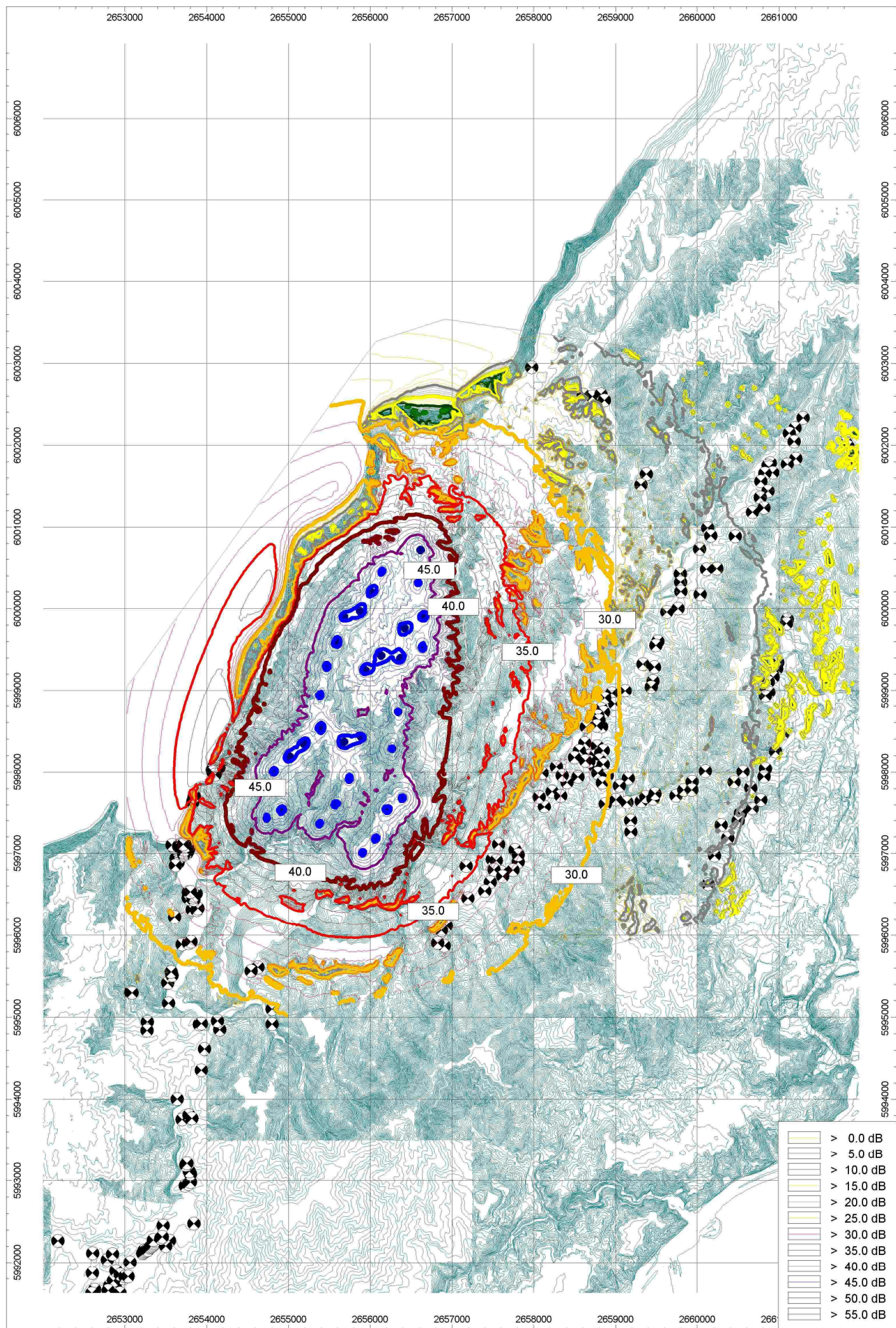
Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	<ol style="list-style-type: none"> Any adverse effects on the identified values can be avoided, remedied or mitigated; and The scale of the activity maintains the identified landscape values and characteristics. 			<ol style="list-style-type: none"> Any adverse effects on the identified values can be avoided, remedied or mitigated; and The the scale of the activity maintains the identified landscape values and characteristics.
Policies NFL-P5 and NFL-P6	<p>NFL-P5: Use and development within outstanding natural features and landscapes outside the coastal environment</p> <p>Only allow for use and development within outstanding natural features and landscapes outside the coastal environment where:</p> <ol style="list-style-type: none"> Any significant adverse effects on the identified values can be avoided and any other adverse effects on the identified values can be avoided, remedied or mitigated; and The activity is designed to protect the identified values 	Oppose	<p>The word 'only' is not necessary because the following text explains where use and development will be allowed. Clause 2 of the policy does not add any value because Clause 1 addresses the same issue (protecting the identified values).</p>	<p>Delete clause 2 of Policy NFL-P5 or otherwise eliminate the duplication between clauses 1 and 2:</p> <p>Use and development within outstanding natural features and landscapes outside the coastal environment</p> <p>Only allow for use and development within outstanding natural features and landscapes outside the coastal environment where:</p> <ol style="list-style-type: none"> Any significant adverse effects on the identified values can be avoided and any other adverse effects on the identified values can be avoided, remedied or mitigated; and The activity is designed to protect the identified landscape values and characteristics.

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	landscape values and characteristics.			
Policy NFL-P6	<p>NFL-P6: Use and development within outstanding natural features and landscapes within the coastal environment</p> <p>Avoid use and development within outstanding natural features and landscapes within the coastal environment unless any adverse effects on the identified values can be avoided.</p>	Oppose	<p>The NZCPS does not require avoidance of all adverse effects on outstanding natural features and landscapes within the coastal environment. Rather, avoidance of <i>significant</i> adverse effects is required.</p>	<p>Amend Policy NFL-P6 as follows (or similar):</p> <p>Use and development within outstanding natural features and landscapes within the coastal environment</p> <p>Avoid use and development within outstanding natural features and landscapes within the coastal environment unless <u>any-all significant</u> adverse effects on the identified values can be avoided and other effects are avoided, remedied or mitigated.</p>
PA PUBLIC ACCESS				
Objective PA-O2	<p>Adverse effects of public access</p> <p>Public access does not have a negative impact on existing values such as natural character, indigenous biodiversity, landscape values, historic heritage, sites of significance to Māori or the coastal environment.</p>	Oppose in part	<p>The objective needs to be moderated to ensure that public access does not compromise the security of existing regionally significant infrastructure.</p>	<p>Amend Objective PA-O2 to protect the security of regionally significant infrastructure as follows (or similar):</p> <p>Adverse effects of public access</p> <p>Public access does not have a negative impact on existing values such as natural character, indigenous biodiversity, landscape values, historic heritage, sites of significance to Māori, <u>the security of regionally significant infrastructure</u> or the coastal environment.</p>
Policy PA-P3	Restriction of public access	Support in part	The protection of existing regionally significant infrastructure other than the Port and Airport is another legitimate reason for	<p>Amend Policy PA-P3 by adding an additional circumstance for restriction to the list as follows:</p>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	Only allow for the restriction of public access to, along or adjacent to the coast and waterbodies where the restriction is necessary to: 1. ... 11. Provide for the safe and efficient operation of the Port and Airport Zone.		restricting public access that should be added to the list of exceptions.	Restriction of public access Only allow for the restriction of public access to, along or adjacent to the coast and waterbodies where the restriction is necessary to: 1. 11. Provide for the safe and efficient operation of <u>regionally significant infrastructure, including</u> the Port and Airport Zone.
PART 3 AREA-SPECIFIC MATTERS				
General Rural Zone Rules	General Rural Zone Standards	Oppose in part	The Plan establishes a policy framework that seeks to avoid adverse reverse sensitivity effects for existing regionally significant infrastructure. One source of potential reverse sensitivity is allowing sensitive activities to establish close to existing wind farm turbines. The policy intention (of avoiding reverse sensitivity effects) needs to be carried through into the rules for the General Rural Zone by requiring new sensitive activities (a defined term including dwellings) to be located a minimum distance away from existing wind turbines that will protect the amenity values of the sensitive activity. The distance should be established based on the noise contour endorsed for the resource	Insert an additional standard GRUZ-S5 and insert it as a required standard in Rules GRUZ R17 (Construction, alteration or addition to buildings and structures associated with rural activities) and GRUZ-R18 (Construction, addition or alteration to residential buildings and structures): <u>New Standard GRUZ-S5:</u> <u>1.Minimum setback for sensitive activities</u> <u>Setback: no closer than the 40 dBA noise contour in relation to turbines in the existing West Wind and Mill Creek wind farms shown on Attachment A to this submission (and this will need to be given a District Plan map reference).</u>

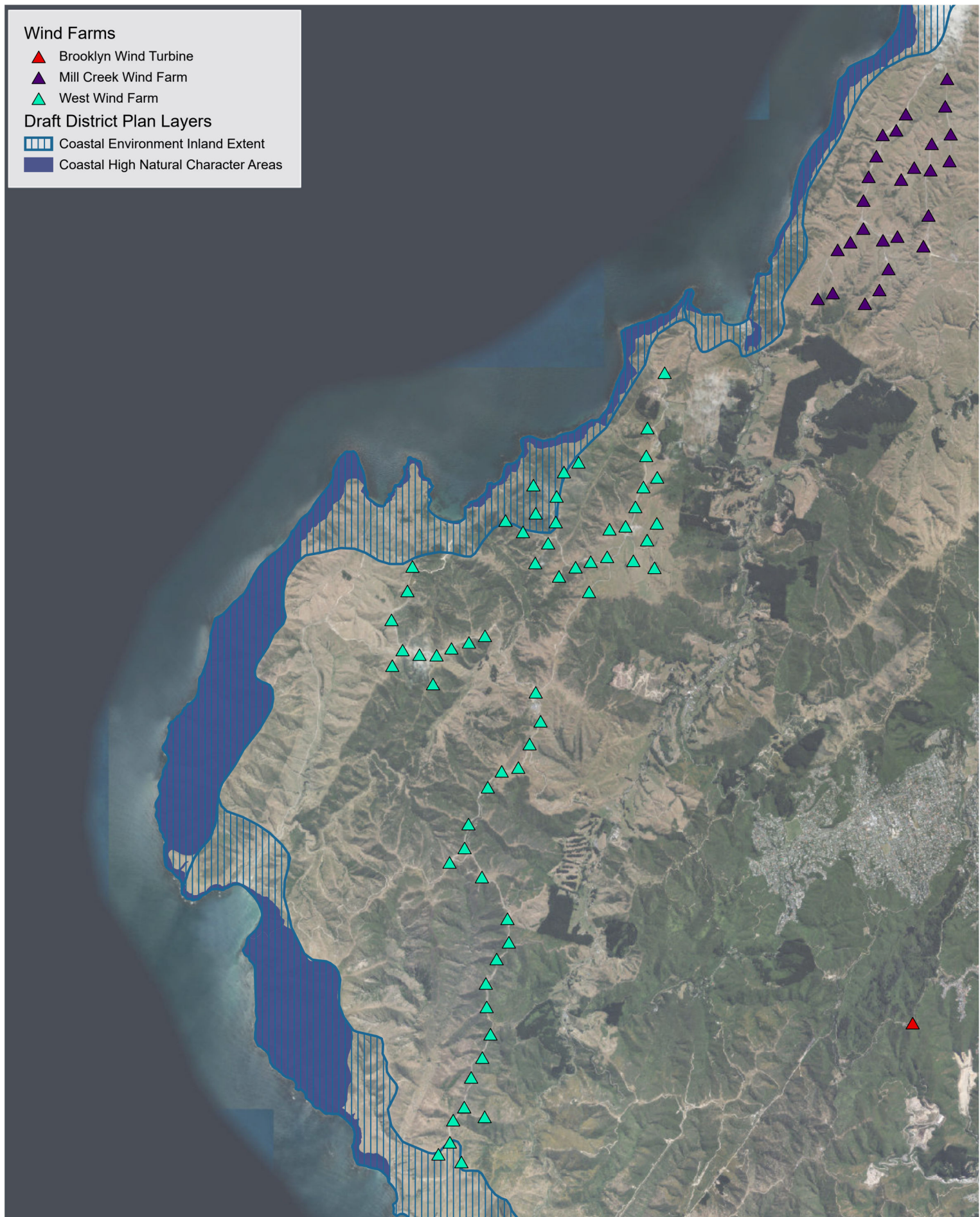
Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
			consents for the West Wind and Mill Creek wind farms.	
PART 4 APPENDICES, DESIGN GUIDES AND SCHEDULES				
Rural Design Guide	The design guide applies to residential developments and other buildings that require resource consent in the Rural Zone of the District Plan.	Oppose in part	The Design Guides are a statutory part of the Wellington City District Plan. The Council will use the Design Guides to assess resource consent applications for development. The Rural Design Guide is potentially applicable to applications for consent for new and upgrading of renewable electricity generation activities in the General Rural Zone. Most of the guidance is relevant to rural production and residential buildings only and not relevant at all for renewable electricity generation activities.	Insert into the Rural Design Guide a statement clarifying that the Design Guide does not apply to renewable electricity generation activities (including renewable electricity generation investigation activities and upgrading of renewable electricity generation activities) in the General Rural Zone.
SCHED10 Outstanding Natural Features and Landscapes				
SCHED10 'Raukawa Coast Cook Strait'	Known as Wellington's wild coast, the Raukawa Coast is a rugged, remote, and expressive coastline characterised by steep escarpments above narrow gravel beaches along several notable headlands, bays and rock formations. The landscape extends along the coast from the former quarry at Owhiro Bay around Cape Terawhiti north to Ohau Bay. Outstanding Natural	Oppose in part	The text description is incomplete because it fails to acknowledge the visible presence of the existing turbines and other built structures in the West Wind and Mill Creek wind farms which are visible, along with this natural landscape, from long distances away (on land and at sea).	Amend the description by inserting the following (or similar) text acknowledging the existing turbines and other built structures in the West Wind and Mill Creek wind farms which form part of the backdrop to the coastal escarpments: <u>'The backdrop to this natural landscape includes the wind turbines, roads and structures in the West Wind and Mill Creek wind farms, including turbines within the mapped coastal environment (as detailed on the plan contained in Attachment B to this submission –</u>

Chapter & Reference	Proposed Plan Provision:	Meridian's Position	Reasons	Requested Relief
	Features Te Rimurapa Sinclair Head/Pariwhero Red Rocks and Terawhiti are contained within this landscape. The largely unmodified coastline is home to seal colonies and important lizard and bird species. Regenerating native vegetation can be found along coastal escarpments and within protected gullies. While there are some scattered primary forest remnants, the slopes and ridgetops are dominated by pasture. There are several important cultural and historic sites within the area.			<p><u>which will need to be given a District Plan map reference</u>’</p> <p>Include the map contained in Attachment B to this submission, showing the extent of existing West Wind and Mill Creek wind farm turbines (prepared by Wellington City Council) as an overlay on the Plan maps.</p>
PLAN MAPS				
Plan Maps				<p>Include the map contained in Attachment B to this submission, showing the mapped extent of existing West Wind and Mill Creek wind farm turbines (prepared by Wellington City Council) as an overlay on the Plan maps.</p>



Section 32 Report

Renewable Electricity Generation



Wind Turbine Locations and Coastal Environments

Date: 22/02/2022

Created by: District Planning Team

Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

Wellington City Proposed District Plan - further submission form

Clause 8 of the First Schedule, Resource Management Act 1991.

How to make a further submission

- email your submission to: **PDPsubmissions@wcc.govt.nz**
- post this form to us (no stamp needed)
- drop your completed form off to Wellington City Council reception, Level 16, 113 The Terrace.

To make sure your further submission can be considered, please lodge by **5pm Friday 2 December 2022**.

Privacy statement - what we do with your personal information

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified Proposed Plan process.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at **district.plan@wcc.govt.nz**.

Certain persons may make further submissions

Under clause 8, Schedule 1 of the RMA the following persons may make a further submission, in the prescribed form, on a proposed plan to the relevant local authority:

- any person representing a relevant aspect of the public interest
- any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has
- the local authority itself.

You will need to explain why you meet one of these categories (space is provided in the form for this below).

Reasons why a further submission may be struck out

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least one of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Note to person making the submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority (Wellington City Council).

Your details

Name Meridian Energy Limited	
Postal address (including suburb) P O BOX 2146, CHRISTCHURCH 8140	
Phone/mobile 027 8011 255	Email andrew.guerin@meridianenergy.co.nz
I am making this submission: <input type="checkbox"/> as an individual <input checked="" type="checkbox"/> on behalf of an organisation. Organisation's name: As above	
I would like to be heard in support of my further submission <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

This is a further submission on the Wellington City Proposed District Plan

State whether you are (select appropriate box)

<input type="checkbox"/> A person representing a relevant aspect of the public interest. <i>In this case, also please specify the grounds for saying that you come within this category</i>
--

☒ A person who has an interest in the proposal that is greater than the interest the general public has.
In this case, also please explain the grounds for saying that you come within this category.

☐ The local authority for the relevant area.
In this case, also please specify the grounds for saying that you come within this category.

Multiple provisions can be commented on within the following section. Feel free to add more pages to your further submission to provide a fuller response.

I support/oppose the submission of: <i>(State the submission number, name and address of the person making the original submission)</i>	The particular part/s of the submission I support/oppose are: <i>(State the submission number/point number of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support/opposition are: <i>(State the nature of your submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed/disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
As detailed in the attached table of further submission points.	Sub no./ point no.	Support/ oppose	Provision	As detailed in the attached table of further submission points.	As detailed in the attached table of further submission points.
	Sub no./ point no.	Support/ oppose	Provision		

	Sub no./ point no.	Support/ oppose	Provision		
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	Sub no./ point no.	Support/ oppose	Provision		

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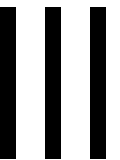
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Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Reply



FREEPOST 2199

District Plan Team (121)

PO Box 2199

Wellington 6140

Friday, December 2, 2022

The Chief Executive
Wellington City Council
P O Box 2199
Wellington 6140

Meridian Energy Limited
P O Box 2128 Christchurch,
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027 8011 255
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Kia ora

PROPOSED WELLINGTON CITY DISTRICT PLAN: FURTHER SUBMISSIONS OF MERIDIAN ENERGY LIMITED

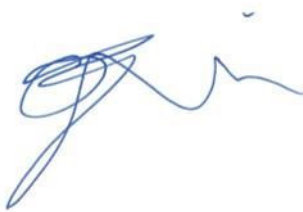
I attach the further submissions of Meridian Energy Limited (**Meridian**) on submissions received on the Council's Proposed District Plan.

Meridian supports or opposes the relief requested in the identified submissions and seeks the decisions and relief requested in the attached table of individual further submission points, or such further or other relief as will address the issues raised in the further submissions.

Meridian reiterates its desire to participate in pre-hearing meetings, including with other submitters, to explore amendments to address the requested decisions outlined in the first-round or attached further submissions.

Please don't hesitate to contact me if there are any matters that you or your Team wish to clarify or to discuss refinements to the proposed District Plan provisions that would address Meridian's requested relief.

Ngā mihi



Andrew Guerin
Environmental Manager
Wellington

Wellington City Proposed District Plan Further Submissions of Meridian Energy Limited

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Part 1: Introduction and General Provisions:				
Interpretation: Definitions				
M&P Makara Family Trust	159.1	Support in part	Requested new definition for 'repowering' if different from 'upgrading'	The meaning of 're-powering' is framed by the rules in which the expression is used. Meridian has no opposition to a new definition for 're-powering' but will need to consider the detail of any wording proposed.
Royal Forest and Bird Protection Society	345.4 345.5	Oppose	Definition of 'Biodiversity Compensation'	Meridian considers that compensation is an appropriate management tool, including for effects on significant biodiversity, within an effects management hierarchy. Meridian considers that the definition should be retained and require no net loss and preferably a net gain.
Woolworths New Zealand	359.5	Oppose	Definition of 'Functional Need'	'Functional Need' is an expression that has come into use in resource management practice usually in association with the particular requirements of infrastructure (not general development activity). The definition should be retained as notified to ensure its specialist intent is not compromised by wider application.
Woolworths New Zealand	359.6	Oppose	Definition of 'Operational Need'	'Operational Need' is an expression that has come into use in resource management practice usually in association with the particular requirements of infrastructure (not general development activity). The definition should be retained as notified to ensure its specialist intent is not compromised by wider application.
				Meridian requests that the wording of any proposed new definition of 're-powering' be circulated for consideration prior to preparation of any section 42A reports to the Hearing Panel.
				Disallow the requested deletion of the definition.
				Disallow the requested amendment.
				Disallow the requested amendment.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.10	Oppose	Definition of 'Regionally Significant Infrastructure'	Disallow the requested amendment.
New Zealand Defence Force	423.3	Oppose	Definition of 'Regionally Significant Infrastructure'	Disallow the requested amendment.
KiwiRail Holdings Limited	408.15	Support in part	Definition of 'Reverse Sensitivity'	Allow the requested amendment.
New Zealand Motor Caravan Association	314.7 314.8	Oppose	Definition of 'Sensitive Activity'	Disallow the requested exclusion of camping grounds or temporary accommodation. Disallow the request to include criteria.
Royal Forest and Bird Protection Society	345.14	Oppose	Definition of 'Significant Natural Area'	Disallow the requested amendment.
Wellington International Airport Ltd	406.46	Oppose in part	Definition of 'Upgrading'	Allow in part by accepting the requested additional text but retaining the text: 'means the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure'.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Guardians of the Bays	452.3	Oppose	Inclusion of increased carrying capacity in the definition is essential to allow for improvements in efficiency and new technology that can enhance energy generation output (for example) without introducing new or additional adverse effects.	Disallow the requested deletion.
Part 2: Strategic Direction				
Royal Forest and Bird Protection Society	345.27	Oppose	All infrastructure, including regionally significant infrastructure, delivers benefits for the Wellington City communities. All relevant benefits should be recognised. There is no mandate in the RMA or any of the higher order documents for retaining, protecting and enhancing all indigenous biodiversity. There is mandate in section (6) of the RMA and the NZCPS for protecting <i>significant</i> indigenous biodiversity and <i>significant</i> habitats of indigenous fauna.	Disallow the requested amendments.
WCC Environmental Reference Group	377.22	Oppose	The intention of the objective is, consistent with the approach adopted generally nationwide, that in making decisions about new and upgraded infrastructure the listed benefits must be recognised. This approach gives effect to the relevant higher order National Policy statements and is to be preferred over the requested amendment. There is no mandate in the RMA or the higher order policy instruments for protecting or enhancing the environment in an absolute sense as suggested.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.28	Oppose	There is no mandate in the RMA or higher order policy instruments for protection of all indigenous biodiversity. The NPS-FM requirement is that freshwater (as opposed to land resources) is managed to <i>give effect to</i> Te Mana o te Wai (NPS-FM 2020 Policy 1).	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.29	Oppose	Strategic Direction: Objective SCA-O3	The RMA, NZCPS and RPS require protection of <i>significant</i> indigenous biodiversity (not <i>all</i> indigenous biodiversity).	Disallow the requested amendments.
Yvonne Weeber	340.10	Oppose	Strategic Direction: Objective SCA-O4	Meridian does not agree that all existing infrastructure can be considered to be inappropriately located. In the absence of any specific wording, it is not reasonable to properly consider the implications of, or allow, the request.	Disallow the request.
Royal Forest and Bird Protection Society	345.30	Oppose	Strategic Direction: Objective SCA-O4	Recognising and providing for the benefits of infrastructure gives effect to relevant National Policy Statement direction and is appropriate.	Disallow the requested amendments.
Guardians of the Bays	452.9	Oppose	Strategic Direction: Objective SCA-O4	Meridian does not agree that all existing infrastructure can be considered to be inappropriately located. In the absence of any specific wording, it is not reasonable to properly consider the implications of, or allow, the request.	Disallow the request.
Royal Forest and Bird Protection Society	345.31	Oppose	Strategic Direction: Objective SCA-O5	It is not consistent with the RMA framework, or with the relevant higher order policy instruments, to require all adverse effects of infrastructure to be avoided. Economic, social, environmental and cultural benefits are relevant in terms of the RMA framework and higher order policy instruments.	Disallow the requested amendments.
Transpower New Zealand Limited	315.45	Support	Strategic Direction: Objective SCA-O6	Meridian agrees that reverse sensitivity is not the only potential adverse effect that can compromise the operation of infrastructure. Examples of other adverse effects include the establishment of activities or allowing traffic activities that have the potential to interfere with safe access to existing lawfully established infrastructure sites, or the establishment of activities or public access that introduces a risk of direct damage to lawfully established infrastructure (including regionally significant infrastructure).	Allow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
WCC Environmental Reference Group	377.24	Oppose	Strategic Direction: Objective SRCC-O1	It is not clear what the rationale is for a limit of doubling (increase of 'up to 100%') is necessary or helpful if the ambition is to achieve net zero carbon emissions by 2050.	Disallow the requested limit.
Part 2: Energy Infrastructure and Transport					
Royal Forest and Bird Protection Society	345.38	Support in part	Infrastructure General INF	Meridian agrees there is merit in clarifying the scope of the chapter and its relationship to other chapters.	Allow the request to the extent it is consistent with Meridian's own submission points on this chapter.
Royal Forest and Bird Protection Society	345.39	Support in part	Infrastructure General INF	Meridian agrees there is merit in clarifying the scope of the chapter and its relationship to other chapters. Meridian does not consider it is necessary to replicate the provisions of the other chapters within the Infrastructure chapter.	Allow the request to the extent it is consistent with Meridian's own submission points on this chapter. Disallow the requested alternative relief (objectives mirroring the objectives of other chapters).
Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited	99.13	Support	Infrastructure INF-O3	Meridian agrees the spelling error ('or') should be amended (to read 'of').	Allow the requested correction.
Powerco Limited	127.6	Support			
CentrePort Limited	402.48	Support			
Kainga Ora Homes and Communities	391.111	Oppose	Infrastructure INF-O3	Meridian supports retention of the reference to 'reverse sensitivity' (which is a valid potential adverse effect of concern) but agrees the word 'or' should be 'of'.	Allow the amendment of 'or' to read 'of'.
Royal Forest and Bird Protection Society	345.40	Support in part	Infrastructure INF-P5	Meridian agrees the policy should apply to the establishment, operation (including maintenance and repair) and removal of infrastructure. Meridian considers it is important that the policy refers to 'identified values' so that Plan users have certainty about how to manage activities in overlays.	Allow the specification of the 'operation (including maintenance and repair) and removal of infrastructure'. Disallow the requested deletion of 'identified values' of overlays.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:	
Royal Forest and Bird Protection Society	345.42	Oppose	Infrastructure INF-P13	It will not be practicable to avoid all adverse effects on natural character in all situations (neither is it required in all situations). Meridian supports the alternative relief wording (avoiding, remedying, or mitigating adverse effects on natural character in accordance with the requirements of other chapters) but does not consider it needs stating in this policy (because the other policies are applicable in any event).	Disallow the requested deletion of clause (2).
Part 2: Energy Infrastructure and Transport – Coastal Environment					
Royal Forest and Bird Protection Society	345.43	Oppose	Infrastructure Coastal Environment INF-CE	The RMA, NZCPS and RPS do not require that all of the natural character of the coastal environment (which includes modified natural character) is to be protected.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.44	Oppose	Infrastructure Coastal Environment INF-CE	Meridian does not agree that the rules in the CE chapter should be replicated in this INF-CE chapter, for the reasons explained in its own submission point 228.25. The CE chapter rules are not tailored for or appropriate for large scale renewable electricity generation facilities.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.45	Oppose	Infrastructure Coastal Environment INF-CE-P14	Policy INF-P14 applies to existing lawfully established facilities. It is appropriate to allow upgrading of existing facilities, which potentially has substantially lesser environmental effects that having to establish new or expanded renewable electricity generation facilities elsewhere (including in the coastal environment).	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.46	Oppose	Infrastructure Coastal Environment INF-CE-P15	The RMA, NZCPS and RPS do not require that all of the natural character of the coastal environment (which includes modified natural character) is to be managed in the way the submitter proposes.	Disallow the requested amendment.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.49	Oppose	Infrastructure Coastal Environment INF-CE-P18	Policy INF-CE-P18 applies outside areas of high natural character and outside riparian areas, and does not conflict with NZCPS Policy 13.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.51	Oppose	Infrastructure Coastal Environment INF-CE-P20	Policy INF-CE-P20 requires that the activity is of a scale that maintains or restores the identified values of Schedule SCHED13 or natural character and requires avoidance of significant adverse effects (and other adverse effects are avoided, remedied or mitigated). Operational need is a legitimate consideration for infrastructure that has limited locational or operational options within the coastal environment.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.54	Oppose	Infrastructure Coastal Environment INF-CE-P23	Policy INF-CE-P23 requires that the activity is of a scale that maintains or restores the identified values of Schedule SCHED13 or natural character and requires avoidance of significant adverse effects (and other adverse effects are avoided, remedied or mitigated). Operational need is a legitimate consideration for infrastructure that has limited locational or operational options within the coastal environment.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.55	Oppose	Infrastructure Coastal Environment INF-CE-P23	Policy INF-CE-P24 applies outside areas of high natural character and outside riparian margins and does not conflict with NZCPS Policy 13.	Disallow the requested amendment.
Greater Wellington Regional Council	351.92	Support in part	Infrastructure Coastal Environment INF-CE-P24	Meridian agrees that the 'avoid significant adverse effects' and 'avoid, remedy or mitigate other effects' is appropriate. However, Meridian also considers it remains valid to consider functional and operational needs in the circumstances covered by Policy INF-CE-P24.	If the amendment is allowed, also insert a reference to considering the functional needs and operational needs of the proposed infrastructure.
Wellington International Airport Limited	406.127	Oppose	Infrastructure Coastal Environment INF-CE-P24	Policy INF-CE-P24 may not be relevant for the airport but remains relevant for other infrastructure in the coastal environment.	Disallow the requested deletion.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.56	Oppose	Infrastructure Coastal Environment INF-CE-P25	Reference to the 'identified' values in Schedule SCH12 is valid (in the interests of certainty in Plan implementation). Operational need is a relevant consideration, alongside the other considerations that seek to protect the natural character and values of the coastal environment.	Disallow the requested amendments.
Greater Wellington Regional Council	351.93	Oppose	Infrastructure Coastal Environment INF-CE-P25	Meridian does not agree that a combined policy is the most appropriate way to achieve the Plan's objectives and opposes the suggested deletion of functional need and operational requirements as a consideration.	Disallow the requested amendments.
Wellington International Airport Limited	406.128	Oppose	Infrastructure Coastal Environment INF-CE-P25	Policy INF-CE-P25 may not be relevant for the airport but remains relevant for other infrastructure in the coastal environment.	Disallow the requested deletion.
Wellington International Airport Limited	406.130	Support in part	Infrastructure Coastal Environment INF-CE-R27	Meridian agrees that Rule INF-CE-R27 will be redundant where consents (and consent conditions) authorise infrastructure in the coastal environment.	Allow the requested deletion.
Avryl Bramley	202.25	Oppose	Infrastructure Coastal Environment INF-CE-R29	The rule applies to existing established infrastructure (not new infrastructure). The terms on which such infrastructure is able to be established and operate within the coastal environment will be determined by consent conditions or the permitted activity rule under which it is established. In this respect, the rule may not be strictly necessary in any event. The request by the submitter to require notification is not relevant (or appropriate).	Disallow the requested amendments.
Wellington International Airport Limited	406.140	Oppose	Infrastructure Coastal Environment INF-CE-R33	Policy INF-CE-P25 may not be relevant for the airport but remains relevant for other infrastructure in the coastal environment.	Disallow the requested deletion.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Part 2: Energy Infrastructure and Transport Ecosystems and Biodiversity				
Royal Forest and Bird Protection Society	345.57	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO	Meridian does not agree that the objectives for significant natural areas (in the SNA chapter) should be replicated in this INF-ECO chapter.
Royal Forest and Bird Protection Society	345.58	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO	Meridian considers that, taken together, the objectives and policies of the INF-ECO chapter do give effect to the NZCPS.
Wellington International Airport Limited	406.143 406.144	Support	Infrastructure Ecosystems and Biodiversity INF-ECO	Meridian agrees that the additional policy and proposed new rule, providing for appropriate vegetation removal in significant natural areas, have merit.
Wellington International Airport Limited	406.146 406.147	Oppose in part	Infrastructure Ecosystems and Biodiversity INF-ECO-P33	Meridian considers Policy INF-ECO-P33 is appropriate and necessary, to provide for existing lawfully authorised infrastructure, so opposes its deletion. Meridian supports the proposed clause 2 (which requires adverse effects to be managed in accordance with Policy ECO-P1). The policy applies to existing infrastructure such that the locational considerations may not be relevant.
Chorus, Spark and Vodafone	99.50	Support	Infrastructure Ecosystems and Biodiversity INF-ECO-P33	Meridian agrees the correct reference is to Policy P1.
Powerco Limited	127.32	Support		
Wellington International Airport Ltd	406.150	Support in part	Infrastructure Ecosystems and Biodiversity INF-ECO-P33	Meridian agrees the correct reference is to Policy P1.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.60	Support in part	Infrastructure Ecosystems and Biodiversity INF-ECO-P33	Meridian agrees the correct reference is to Policies P1 and P5.	Allow the requested amendment (replacing ECO-P2 with ECO-P1 and ECO-P5).
Royal Forest and Bird Protection Society	345.66	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO-R41	Meridian opposes the requested non-complying activity status. The rule is not necessary because, within SNAs, most infrastructure will require a consent to establish and the terms of the consent will manage effects on the values of the SNA of operation, maintenance and repair. Removal of infrastructure does not warrant non-complying activity status. It is also relevant that this activity status has not been retained in the Natural and Built Environments Bill.	Disallow the requested new rule.
Royal Forest and Bird Protection Society	345.67	Oppose in part	Infrastructure Ecosystems and Biodiversity INF-ECO-R42	Meridian agrees that reference to Policy ECO-P1 is appropriate but opposes the requested non-complying activity status.	Allow the correction of the reference to ECO-P1. Disallow the requested exemption and the proposed new non-complying activity rule.
Royal Forest and Bird Protection Society	345.68	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO-R43	Meridian opposes the requested non-complying activity status. The submission does not provide reasoning that supports non-complying activity status in terms of the requirements of s. 32AA of the RMA	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.76	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO-S19	The subject matter of the requested amendments is addressed already by the wording of the standard as notified. The requested amendments are unnecessary.	Disallow the requested amendments.
Greater Wellington Regional Council	351.95	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO-S19	The values of concern should be those that have been identified as the reason for identification of the area as significant. Broadening the consideration to all values, as proposed by the submission, will create uncertainty and potential unwarranted costs for applicants for consents.	Disallow the requested deletion of 'identified'.
Royal Forest and Bird Protection Society	345.77	Oppose	Infrastructure Ecosystems and Biodiversity INF-ECO-S20	The standards are very restrictive, limiting the potential for adverse effects to minor, and ensuring that earthworks with the potential for adverse effects more than minor will require consent. The requested amendments are not necessary.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:			The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Greater Wellington Regional Council	351.97	Oppose	Infrastructure Ecosystems and Biodiversity	INF-ECO-S19	The values of concern should be those that have been identified for the SNA as the reason why the area is significant.	Disallow the requested deletion of 'identified'.
Part 2: Energy Infrastructure and Transport			Natural Features and Landscapes			
John Tiley	142.5	Oppose in part	Infrastructure Natural Features and Landscapes	INF-NFL	Some ridgelines in the rural area feature lawfully established wind turbines and wind farm infrastructure. Their presence should be acknowledged. The aim of being 'free of any development' is unachievable and not relevant for those situations.	Disallow the request in relation to existing built development within ridgeline overlays.
Churton Park Community Association	189.5	Oppose in part				
Royal Forest and Bird Protection Society	345.78 345.79 345.80	Oppose	Infrastructure Natural Features and Landscapes	INF-NFL	It is not necessary or appropriate to 'mirror' (replicate) the NFL chapter provisions within the INF-NFL chapter. The values of identified features and landscapes are described in the Schedules and the objectives and policies, correctly, focus on managing the effects of activities (including, in the INF-NFL chapter, the effects of infrastructure.	Disallow the request.
Royal Forest and Bird Protection Society	345.81	Oppose	Infrastructure Natural Features and Landscapes	INF-NFL	NZCPS Policy 11 addresses indigenous biological diversity (not natural features and landscapes). The requested text is not relevant for chapter INF-NFL.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.82	Oppose	Infrastructure Natural Features and Landscapes	INF-NFL-P39	The relevant values are (only) those that give rise to the identification of the area in the Schedule. The provisions of the NFL and ECO chapters apply anyway (that is clear in the structure of this Plan) and the requested references to these chapters are unnecessary.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.84	Oppose	Infrastructure Natural Features and Landscapes INF-NFL INF-NFL-P40	The request in relation to 'reconsenting' is confusing because land use consents are generally not time limited. The relevant values are (only) those that give rise to the identification of the area in the Schedule. The requested 'direction' in relation to NZCPS Policy 11 is also confusing because that policy addresses indigenous biological diversity, not landscape values, so is not directly relevant for the INF-NFL chapter.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.87	Oppose	Infrastructure Natural Features and Landscapes INF-NFL INF-NFL-P43	The relevant values are (only) those that give rise to the identification of the area in the Schedule. Functional and operational need are relevant considerations. The proposed additional clause 4 is not necessary because the objectives and policies of the referenced chapters are applicable in any event.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.89	Oppose	Infrastructure Natural Features and Landscapes INF-NFL INF-NFL-P45	The relevant values are (only) those that give rise to the identification of the area in the Schedule. The request to give effect to NZCPS Policy 11 is confusing because that policy addresses indigenous biological diversity, not landscape values, so is not directly relevant for the INF-NFL chapter. Meridian considers the policy already gives effect to NZCPS Policy 15, in the manner intended by that policy. The references to policies in other chapters of the plan are not necessary because, in the structure of this Plan, they are applicable anyway.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.92	Oppose	Infrastructure Natural Features and Landscapes INF-NFL INF-NFL-P48	The relevant values are (only) those that give rise to the identification of the area in the Schedule. Functional and operational need are relevant considerations. The proposed additional clause 4 is not necessary because the objectives and policies of the referenced chapters are applicable in any event. The request to give effect to NZCPS Policy 11 (indigenous biological diversity) is not directly relevant for special amenity landscapes.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:	
Royal Forest and Bird Protection Society	345.93	Oppose	Infrastructure Natural Features and Landscapes INF-NFL INF-NFL-P49	The relevant values are (only) those that give rise to the identification of the area in the Schedule. Functional and operational need are relevant considerations. The proposed additional clause 4 is not necessary because the objectives and policies of the referenced chapters are applicable in any event.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.94	Oppose	Infrastructure Natural Features and Landscapes INF-NFL INF-NFL-P50	The relevant values are (only) those that give rise to the identification of the area in the Schedule.	Disallow the requested amendments.
Part 2: Energy Infrastructure and Transport Renewable Electricity Generation					
Royal Forest and Bird Protection Society	345.95	Oppose	Infrastructure Renewable Electricity Generation REG	It is not necessary to include the same level of protection as in the ECO chapter because the objectives and policies of that chapter apply anyway. Operational need is a valid consideration in the policy framework, particularly for regionally significant infrastructure, and ensures the Plan gives effect to the NPS-Renewable Electricity Generation. The values considered in the policy framework should be those identified in the Plan as the basis for identification of the area in the Plan Schedule(s).	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.96	Oppose	Infrastructure Renewable Electricity Generation REG	The potential for renewable electricity generation activities to create adverse environmental effects is acknowledged in the REG chapter (Objective REG-O2 and Policies REG-P3, REG-P4, REG-P5, REG-P6, REG-7, REG-P8, REG-P9 and in the REG rules which require consents for certain REG activities to ensure potential adverse effects are assessed and managed.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.97	Oppose	Infrastructure Renewable Electricity Generation REG	The potential for renewable electricity generation activities to create adverse environmental effects is acknowledged in the REG chapter (Objective REG-O2 and Policies REG-P3, REG-P4, REG-P5, REG-P6, REG-7, REG-P8, REG-P9 and in the REG rules which require consents for certain REG activities to ensure potential adverse effects are assessed and managed. The objectives and policies that describe the values of indigenous biodiversity, landscape and natural character are set out in the relevant ECO chapters (ECO, NFL,NATC).	Disallow the requested amendments.
Greater Wellington Regional Council	351.101	Support in part	Infrastructure Renewable Electricity Generation REG-O1	The submission seeks to ensure the renewable electricity generation provisions in the Plan go as far as they can to promote energy efficient design of buildings and enable renewable energy generation. Meridian agrees this is important in order to facilitate the transition from fossil fuel dependence to low or zero emissions economy (this being part of the purpose of GWRC's proposed RPS Change No. 1). Meridian considers there is scope for the Plan to do better in this regard and its own submission proposes refinements to better achieve the outcome GWRC seeks. Meridian does not agree that additional provisions in zone chapters are required to achieve this outcome (the framework of a self-contained REG chapter plus objectives and policies addressing other values in other chapters works well for this purpose).	Retain the structure of the Plan as notified and, otherwise, allow the submission point and the amendments Meridian and other submitters seek to better enable the generation of electricity from renewable sources.
M&P Makara Family Trust	159.2	Oppose	Infrastructure Renewable Electricity Generation REG-O2	Recognition of the potential national benefits is relevant in both objectives is appropriate.	Disallow the requested deletion.
Royal Forest and Bird Protection Society	345.98	Oppose	Infrastructure Renewable Electricity Generation REG-O2	The clarification that certain values need protection is provided in the relevant chapters addressing natural features and landscapes, indigenous biodiversity, heritage etc.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.99	Oppose	Infrastructure Renewable Electricity Generation REG-P1	The clarification that certain values need protection is provided in the relevant chapters addressing natural features and landscapes, indigenous biodiversity, heritage etc.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.100	Oppose	Infrastructure Renewable Electricity Generation REG-P2	The clarification that certain values need protection is provided in the relevant chapters addressing natural features and landscapes, indigenous biodiversity, heritage etc.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.101 345.102	Oppose	Infrastructure Renewable Electricity Generation REG-P3	The amendment inserting 'consider' adds no meaningful value to the policy.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.103	Oppose	Infrastructure Renewable Electricity Generation REG-P4	The amendment inserting 'consider' adds no meaningful value to the policy.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.104 345.105 345.106 345.107	Oppose	Infrastructure Renewable Electricity Generation REG-P5	Operational need is a relevant consideration. The values that should be considered are those that are identified for the relevant identified areas. The amendment inserting 'consider' adds no meaningful value to the policy. The requested 'direction' to create 'least amount of effects while avoiding, remedying or mitigating' doesn't make sense. The matters in NFL-P3, NFL-P4, ECO-P2, ECO-P7, CE-P5, CE-P6 and CE-P7 are matters to which regard should be had (not applied) in the consenting framework proposed by this Plan (consistent with s. 104 of the RMA). Policy REG-P5 correctly applies the mitigation hierarchy intended by the NZCPS for the coastal environment.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.110 345.111 345.112 345.113 345.114 345.115 345.116	Oppose	Infrastructure Renewable Electricity Generation REG-P7	It is not necessary to include the same level of protection as in the ECO chapter because the objectives and policies of that chapter apply anyway. The matters in ECO-P2, ECO-P3, ECO-P4, ECO-P7, CE-P5, CE-P6, CE-P7, NFL-P2, NFL-P4, NFL-P5 and NFL-P6 are matters to which regard should be had (not applied) in the consenting framework proposed by this Plan (consistent with s. 104 of the RMA). The requested 'direction' to create 'least amount of effects while avoiding, remedying or mitigating' doesn't make sense. Any proposed adaptive management which may benefit the local environment is a relevant consideration and will be considered in accordance with APP2 and APP3 in any event.	Disallow the requested amendments.
M&P Makara Family Trust	159.4	Oppose	Infrastructure Renewable Electricity Generation REG-P8	Upgrading may necessarily (usually does) involve replacing turbine components.	Disallow the requested deletion.
Royal Forest and Bird Protection Society	345.117 345.118 345.119	Oppose	Infrastructure Renewable Electricity Generation REG-P7	The addition of 'consider' adds no meaningful value to the policy. It is not necessary to include the same level of protection as in the ECO chapter because the objectives and policies of that chapter apply anyway. The requested 'direction' to create 'least amount of effects while avoiding, remedying or mitigating' doesn't make sense. Any proposed adaptive management which may benefit the local environment is a relevant consideration and will be considered in accordance with APP2 and APP3 in any event. The policy framework, as a whole, already gives effect to the NZCPS. Operational need is a relevant consideration.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.120 345.121 345.122	Oppose	Infrastructure Renewable Electricity Generation REG-P9	The addition of 'consider' adds no meaningful value to the policy. It is not necessary to include the same level of protection as in the ECO chapter because the objectives and policies of that chapter apply anyway. The requested 'direction' to create 'least amount of effects while avoiding, remedying or mitigating' doesn't make sense. Any proposed adaptive management which may benefit the local environment is a relevant consideration and will be considered in accordance with APP2 and APP3 in any event. The policy framework, as a whole, already gives effect to the NZCPS. Operational need is a relevant consideration.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.124	Oppose	Infrastructure Renewable Electricity Generation REG-P11	It is not necessary to refer to the need to protect natural values because other applicable policies already do this.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.129	Oppose	Infrastructure Renewable Electricity Generation REG-R1	Meridian agrees reference to the relevant ECO chapter policies has merit but opposes the requested exclusion for NZCPS Policy 11 matters and proposed non-complying activity status.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.130	Support in part	Infrastructure Renewable Electricity Generation REG-R2	Meridian does not oppose the request to add compliance with the vegetation clearance standard but notes the standard would need to be refined to also apply to investigation activities.	Allow the requested amendment with refinement to the standard to clarify that it also applies to investigation activities.
Royal Forest and Bird Protection Society	345.132	Oppose	Infrastructure Renewable Electricity Generation REG-R2	Meridian opposes the proposed exclusion for NZCPS Policy 11 and Policy 15 matters and the proposed non-complying activity status.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.140 345.141	Oppose	Infrastructure Renewable Electricity Generation REG-R5	It is important that the rule does not allow for re-litigation of effects on values (including values identified in the referenced chapters) that were settled through the consent process that established the facility. This rule addresses upgrading (not establishment).	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:		The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.144	Oppose	Infrastructure Renewable Electricity Generation REG-S1	Operational needs, functional needs and technical considerations are relevant considerations where non-compliance with the standard is being assessed.	Disallow the requested deletion of assessment criterion 1.
Greater Wellington Regional Council	351.106	Oppose	Infrastructure Renewable Electricity Generation REG-S2	The relevant values are those identified in the Schedule.	Disallow the requested deletion.
M&P Makara Family Trust	159.8 159.9	Oppose	Infrastructure Renewable Electricity Generation REG-S2	Meridian considers the standards as notified are already conservative. The assessment criteria are appropriate.	Disallow the requested amendments.
Part 2: Natural and Environmental Values		Part 2: Natural and Environmental Values			
Ecosystems and Indigenous Biodiversity		Ecosystems and Indigenous Biodiversity			
Royal Forest and Bird Protection Society	345.173	Support in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO	The objective of maintaining and enhancing indigenous biodiversity at an overall District Scale is appropriate. Enhancement will not be achievable or appropriate in all circumstances however and, consistent with the approach in Objective ECO-O1, the proposed objective would be improved by making it clear that enhancement should occur at the District-wide scale and where appropriate.	Allow the request with amendment to clarify that indigenous biodiversity is to be enhanced overall at District scale and where practicable – for example as follows (or similar wording): <i>‘The District’s indigenous biodiversity is maintained and, where appropriate, enhanced’.</i>
Royal Forest and Bird Protection Society	345.176	Support in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO	The requested additional policy should manage potential adverse effects in accordance with a management hierarchy, as signaled by the exposure draft NPS-Indigenous Biodiversity.	If the requested additional policy is included, ensure it is amended to manage potential adverse effects on indigenous biodiversity in accordance with an effects management hierarchy that focuses on the indigenous biodiversity values.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.178 345.179 345.180 345.182	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO	The requested additional rules would apply to any and all indigenous biodiversity. The proposed limits are unduly restrictive in a rural setting and capture even indigenous vegetation that is planted rather than naturally occurring. The policy needs to give effect to clause (1) (b) of the objective of the exposure draft NPS-Indigenous Biodiversity (providing for social, economic wellbeing of people and communities) as well as protecting, maintaining and restoring indigenous biodiversity.	Disallow the requested new rules or, if the requested rules are included, ensure the permitted activity standards provide for the clearance of indigenous vegetation to the extent necessary to maintain existing lawfully established infrastructure, including regionally significant infrastructure.
Director-General of Conservation	385.35	Support in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO	The requested additional policy should manage potential adverse effects in accordance with a management hierarchy, as signaled by the exposure draft NPS-Indigenous Biodiversity.	If the requested additional policy is included, ensure it is amended to manage potential adverse effects on indigenous biodiversity in accordance with an effects management hierarchy that focuses on the indigenous biodiversity values.
Director-General of Conservation	385.36	Support in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO	There may be circumstances where a 5m setback is not achievable due to legitimate functional or operational needs of infrastructure.	If the requested standard is included, ensure there is provision for reduction of the setback distance where necessary to provide for existing lawfully established infrastructure and where functional or operational needs mean it is not practicable to achieve or maintain a 5m setback.
Tyers Stream Group	221.32	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-O1	Part 2 of the RMA intends that significant natural areas should be protected from <i>inappropriate</i> subdivision, use and development.	Disallow the requested deletion.
Royal Forest and Bird Protection Society	345.183	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-O1	The scheme of the RMA is that significant natural areas should be protected from <i>inappropriate</i> subdivision, use and development.	Disallow the requested deletion.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
WCC Environmental Reference Group	377.116	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-O1	Restoration in all circumstances 'where possible' creates an unduly stringent requirement. Evaluation of what is 'appropriate' better gives effect to the exposure draft NPS-Indigenous Biodiversity objective, including providing for the social and economic wellbeing of people and communities and enabling consideration of the merit or restoring specific indigenous biodiversity resources.	Disallow the requested amendment.
Greater Wellington Regional Council	351.151	Support	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-O2	Meridian supports the proposed wording, which includes 'where appropriate, restored'.	Allow the requested amendment, provided it includes the words 'and, where appropriate, restored'.
Royal Forest and Bird Protection Society	345.187	Oppose in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P1	The proposed amendment conflicts, in part, with the amendments Meridian seeks to Policy ECO-P1.	Allow the amendments only to the extent they align with the amendments requested by Meridian in its submission point 228.73.
Greater Wellington Regional Council	351.153	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P1	Deletion of 'where practicable' from clause 1 would not give effect to the objective of the NPS-Indigenous Biodiversity (it would fail to consider clause (1) (b)). The words 'where practicable' in clause 2 of Policy ECO-P1 address the subsequent step in the hierarchy (not the first 'avoid' step).	Disallow the requested deletion.
WCC Environmental Reference Group	377.120 377.121	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P1	It is relevant to include 'remediation' in the mitigation hierarchy, even if it is unlikely to be employed in most cases. Biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions.	Disallow the requested amendments.
Director-General of Conservation	385.41	Support in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P1	Meridian agrees that any amendments to the wording of ECO objectives and policies must be aligned with the NPS-Indigenous Biodiversity once that is gazetted. The issue will be in the timing of the Plan hearings/decisions and gazettal of the NPS.	Allow the submission point.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.188	Oppose in part	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P2	The policy is deliberately enabling: it provides the policy 'hook' for the rules and standards managing vegetation clearance. Inserting the words 'consider enabling' is at odds with the policy's function. The policy should address the areas identified in the Schedule. Meridian's own submission point 228.75 supports inclusion of the word 'including'. Meridian agrees the policy should be addressing roads.	Allow the insertion of roads and, otherwise, disallow the requested amendments.
Royal Forest and Bird Protection Society	345.189	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P3	The policy should apply to areas identified in the Schedule. The proposed amendments unnecessarily replicate elements of the APP2 and APP3 management hierarchies (which apply anyway and do not require the embellishment proposed in Policy ECO-P3).	Allow the correction of the ECO-P1 policy reference and, otherwise, disallow the requested amendments.
Royal Forest and Bird Protection Society	345.191	Oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-P5	The policy should apply to areas identified in the Schedule. The proposed amendments unnecessarily replicate elements of the APP2 and APP3 management hierarchies (which apply anyway and do not require the embellishment proposed in Policy ECO-P3).	Allow the correction of the ECO-P1 policy reference and, otherwise, disallow the requested amendments.
Royal Forest and Bird Protection Society	345.195	Neither support nor oppose	Natural and Environmental Values Ecosystems and Indigenous Biodiversity ECO-R1	The submission does not specify the relief requested. Any amendments need to give effect to the NPS-Indigenous Biodiversity.	Allow the submission point to the extent the amendments are necessary to give effect to the NPS-Indigenous Biodiversity.
Part 2: Natural and Environmental Values Natural Character					
Royal Forest and Bird Protection Society	345.213	Neither support nor oppose	Natural and Environmental Values Natural Character NATC	The submission does not specify the relief requested. Any amendments need to give effect to the relevant higher order policy instruments.	In the absence of specific wording, disallow the submission point.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Part 2: Natural and Environmental Values				
Natural Features and Landscapes				
Victoria University of Wellington Students' Association	123.42 123.43	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL	The reason for requiring 'extra resource consents for additional buildings or earthworks' within 'natural landscapes' is not provided. Disallow the submission point.
Royal Forest and Bird Protection Society	345.225	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL	The submission point suggests the purpose of the ONFL overlays is to prevent any modification of their outstanding values. The policy framework is more nuanced: it seeks to protect the values from inappropriate subdivision, use and development. In the absence of specific wording, disallow the submission point.
Royal Forest and Bird Protection Society	345.227	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL	NZCPS Policy 11 addresses significant indigenous biodiversity in the coastal environment. It is not directly relevant for chapter NFL. In the absence of specific wording, disallow the submission point.
Royal Forest and Bird Protection Society	345.232	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL-P2	Insertion of 'only' enable adds no meaningful value to the policy, which is to provide for (enable) activities in the specified circumstances. Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.232	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL-P2	Insertion of 'only' enable adds no meaningful value to the policy, which is to provide for (enable) activities in the specified circumstances. Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.233	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL-P3	Insertion of 'only consider providing for' distorts the purpose of the policy, which is to <i>provide for</i> (enable) activities in the specified circumstances. Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.234	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL-P4	Insertion of 'only consider providing for' distorts the purpose of the policy, which is to <i>provide for</i> (enable) activities in the specified circumstances.
Royal Forest and Bird Protection Society	345.235	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL-P5	Insertion of 'only consider allowing' adds no meaningful value to the policy. The focus of consideration should be the values that have been identified as the basis for inclusion of the areas in the Schedule.
Royal Forest and Bird Protection Society	345.236	Oppose	Natural and Environmental Values Natural Features and Landscapes NFL-P6	Meridian considers the amended wording proposed in its submission point 228.91 better gives effect to s. 6 of the RMA and the relevant higher order policy instruments.
Part 2: Natural and Environmental Values Coastal Environment				
Royal Forest and Bird Protection Society	345.290	Oppose	Natural and Environmental Values Coastal Environment CE	The submission point refers to 'all rules'. Meridian notes that the structure of the Plan is that the rules that apply to renewable electricity generation activities are entirely contained in the REG chapter (and Meridian has requested the insertion of notes that clarify this intention throughout the Plan). The submission point is opposed to the extent that it seeks to cut across the Plan's intention.
Royal Forest and Bird Protection Society	345.291 345.292	Oppose	Natural and Environmental Values Coastal Environment CE	The framework of this Plan is that ONFLs, including ONFLs in the coastal environment, are identified in the relevant Schedule and the objectives and policies are set out in the NFL chapter. The NFL chapter policies already provide the protection requested.
				Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.293	Oppose in part	Natural and Environmental Values Coastal Environment CE	NZCPS Policy 11 addresses significant indigenous biological diversity in the coastal environment. The ECO chapter addresses NZCPS Policy 11 matters in relation to activities <i>within</i> SNAs in the coastal environment. Meridian accepts that the ECO chapter does not address NZCPS Policy 11 values outside SNAs. It is not possible to comment in any further detail in the absence of any explicit wording proposal. It may be that amendment to the ECO chapter is necessary to address this point.	Meridian requests that any amendments be detailed for consideration.
Greater Wellington Regional Council	351.197 351.198	Oppose in part	Natural and Environmental Values Coastal Environment CE-O1	It is not accurate to say that the NZCPS requires preservation in an absolute sense. The NZCPS qualifies its use of the word 'preserve' in accordance with s. 6 (a) of the RMA. If the word 'protected' is to be used, it should give proper effect to s. 6 (a) of the RMA and also include the words 'protected from inappropriate subdivision, use and development'. The word 'maintain' works in the context of Objective CE-O1.	Disallow the requested amendments unless the word 'protected' is qualified as intended by the RMA and includes the words 'protected from inappropriate subdivision, use and development'. In the absence of explicit wording of requested relief, disallow the submission point's request for 'any other consequential amendments required'. There is simply insufficient detail.
WCC Environmental Reference Group	377.221	Oppose	Natural and Environmental Values Coastal Environment CE-O1	Meridian considers that the expression 'where practicable' or 'where appropriate' better gives effect to the RMA and higher order policy instruments than 'where possible' (which sets an unduly stringent requirement).	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.295	Oppose	Natural and Environmental Values Coastal Environment CE-O2	The focus of the objective is correctly on the identified characteristics and, consistent with the Objective's title, it should address the mapped areas of high coastal natural character.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Greater Wellington Regional Council	351.200	Oppose	Natural and Environmental Values Coastal Environment CE-O2	The submission point misrepresents the wording of NZCPS Policy 13. The NZCPS does not require absolute preservation of natural character and avoidance in all circumstances. Taken together, the policies of the CE chapter do implement the management hierarchy set out in NZCPS Policy 13 (i.e. avoid adverse effects in areas of outstanding natural character, avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character in all other areas of the coastal environment). Meridian would support amendments that reflect the NZCPS management hierarchy.	Disallow the requested amendments.
Greater Wellington Regional Council	351.204	Oppose in part	Natural and Environmental Values Coastal Environment CE-P1	There is insufficient detail provided about 'area scale natural character ratings' to determine whether they should or should not be included in SCHED12. Any amendments should be advanced as a variation to the Proposed Plan.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.303	Oppose	Natural and Environmental Values Coastal Environment CE-P2	Inserting the words 'consider providing' for use and development distorts the actual purpose of this policy (which is to make clear where use and development will be provided for).	Disallow the requested amendments.
WCC Environmental Reference Group	377.231	Oppose	Natural and Environmental Values Coastal Environment CE-P2	The proposed additional text is not appropriate because it is not clear what is meant by 'environmental values'.	Disallow the requested amendment.
Royal Forest and Bird Protection Society	345.307	Oppose	Natural and Environmental Values Coastal Environment CE-P5	Meridian considers its proposed amended wording in submission point 221.108 more appropriately gives effect to the RMA and higher order policy instruments.	Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Greater Wellington Regional Council	351.208	Oppose	Natural and Environmental Values Coastal Environment CE-P5	Meridian understands the point GWRC is trying to make (that effects on all scales of natural character in the coastal environment must be managed in accordance with NZCPS Policy 13). However, this Plan doesn't identify other 'natural character areas', so the requested relief will not achieve that outcome. Policy CE-P1 and P7, together, implement NZCPS Policy 13 and this Plan does not identify any areas of outstanding natural character in the coastal environment.	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.309	Oppose	Natural and Environmental Values Coastal Environment CE-P7	The requested additional text is not necessary because the Plan already provides for those matters, including in the wording of Policy CE-P7 (1) and (2).	Disallow the requested amendments.
Royal Forest and Bird Protection Society	345.310	Oppose	Natural and Environmental Values Coastal Environment CE-P8	Meridian considers its proposed amended wording in submission point 221.110 more appropriately gives effect to the RMA and higher order policy instruments.	Disallow the requested amendments.
Greater Wellington Regional Council	351.209	Oppose	Natural and Environmental Values Coastal Environment CE-P8	The requested amendments are not necessary because Policy CE-P1 and P7, together, implement NZCPS Policy 13.	Disallow the requested amendments.
Part 3: Area Specific Matters - Zones General Rural Zone					
Barry Ellis	47.2	Oppose	Requested retention of PC33 ridgelines and hilltops overlay.	Meridian accepts the delineation of ridgeline and hilltop overlays shown on the Plan maps	Disallow the requested amendments.
Margaret Ellis	48.2	Oppose			
Rowan Hannah	84.2	Oppose			
Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.36	Oppose			

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Part 4: Appendices APP2 Biodiversity Offsetting				
Royal Forest and Bird Protection Society	345.398 345.399 345.400 345.401 345.402	Oppose	APP2	Meridian considers the wording amendments proposed by its submission point 228.116, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.
Greater Wellington Regional Council	351.327	Oppose	APP2	Meridian opposes the requested requirement for a +10% net biodiversity gain.
Greater Wellington Regional Council	351.328	Oppose	APP2	Meridian opposes the requested requirement for a +10% net biodiversity gain. The submission does not detail the wording proposed for setting out the limitations on biodiversity offsetting.
Part 4: Appendices APP3 Biodiversity Compensation				
Royal Forest and Bird Protection Society	345.403 345.404 345.405 345.406 345.407 345.408	Oppose	APP3	Biodiversity compensation is a valid response, endorsed by the exposure draft NPS-Indigenous Biodiversity and numerous Environment Court decisions. Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.
Greater Wellington Regional Council	351.329 351.330 351.331	Oppose	APP3	Meridian considers the wording amendments proposed by its submission point 228.120, refined where necessary to give effect to the NPS-Indigenous Biodiversity (when that is gazetted), more appropriately give effect to the RMA and higher order policy instruments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:		Reasons	Requested Relief:
Part 4: Schedules				
SCHED8 Significant Natural Areas				
Greater Wellington Regional Council	351.347	Oppose in part	SCHED8	It is not possible to determine whether the areas referred to should be included in SCHED8 without any detail in the submission of the geographical extent proposed to be defined.
Part 4: Schedules				
SCHED10 Outstanding Natural Features and Landscapes				
Royal Forest and Bird Protection Society	345.413	Support in part	SCHED10	Meridian agrees that the descriptions of values in SCHED10 are not helpful in guiding the policy framework.
Royal Forest and Bird Protection Society	345.414	Oppose in part	SCHED10	In the absence of any detail about the geographic extent of the requested addition, it is not possible to evaluate whether it should be included in SCHED10.
Part 4: Schedules				
SCHED11 Special Amenity Landscapes				
John Tiley	142.30	Oppose	SCHED11	There is no basis supplied for including the 18 identified ridgelines and hilltops as 'special amenity landscapes' in SCHED11.
Churton Park Community Association	189.30	Oppose		Disallow the requested amendments.
Part 4: Schedules				
SCHED12 High Coastal Natural Character Areas				
John Tiley	142.31	Oppose	SCHED12	There is no basis supplied for including the 18 identified ridgelines and hilltops as 'high coastal natural coastal character areas' in SCHED12.
Churton Park Community Association	189.31	Oppose		Disallow the requested amendments.

Meridian Energy Limited supports or opposes the submissions of:	The particular part/s of the submission supported or opposed are:			Reasons	Requested Relief:
Royal Forest and Bird Protection Society	345.417 345.418 345.419	Oppose	SCHED12	Meridian agrees that the descriptions of values in SCHED12 are not helpful in guiding the policy framework. In the absence of any specific detail, it is not possible to comment further on the requested amendments.	Meridian requests that any amendments to the SCHED12 descriptions be made available for consideration before inclusion in the Plan.
Greater Wellington Regional Council	351.351 351.353 351.355				
Greater Wellington Regional Council	351.354	Oppose	SCHED12	The objectives and policies that pertain to SCHED12 do not support deletion of 'high' from the title of the Schedule.	Disallow the requested deletion.

Annexure 3

The decisions version of the WCPDP can be found here:
<https://eplan.wellington.govt.nz/proposed/>

List of Submitters and Contact Details - Numerical Order

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16	Peter Kelly	N/A	peter.kelly.planningforgrowth@pck.nz	170 Parkvale Road, Karori 6012
17	Screen Production and Development Association	Sandy Gildea	sandy@spada.co.nz	104 Vivian Street Wellington, Te Aro PO Box 9567, Wellington 6141
18	Gareth Morgan	N/A	gareth@garethmorgan.com	35 Hay Street, Oriental Bay PO Box 19-218, Wellington 6141
19	Joanne Morgan	N/A	jojomorgan@gmail.com	35 Hay Street, Oriental Bay 6011
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21	Edwin Crampton	N/A	ed.san@xtra.co.nz	7 Edington Grove, Churton Park, Wellington 6037
22	Wellington Amusement Holdings	Iain Macleod	iain@penthousecinema.co.nz	205 Ohiro Road, Brooklyn, Wellington 6545
23	Andrew Haddleton	N/A	andrew.haddleton@xtra.co.nz	11/5 Levy Street, Mt Victoria, Wellington 6011
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25	Rod Halliday	N/A	rod.halliday@hrmlimited.co.nz	Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmlands Ltd, Ohau Land and Cattle Ltd 107B Westchester Drive, Churton Park 6037
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27	Abby and Amos Leota	N/A	abbyabroad@gmail.com	75 Bell Street, Tawa, Wellington 5028
28	John L Morrison	N/A	morrisonjohn.nz@gmail.com	9 Aintree Grove, Churton Park, Wellington 6037
29	Sharon Grealley	N/A	sharongrealley@gmail.com	13 Austin Street, Mt Victoria 6011
30	Lizzie Waugh	N/A	cj.max02@gmail.com	13 Green Street, Newtown 6021
31	Vik Holdings Ltd	Dennis Yiappos	dennis.yiappos@outlook.com	P.O. Box 9086, Marion Square 6141
32	Barry Insull	N/A	bipest@xtra.co.nz	5 Eclipse Lane, Whitby, Porirua 5024
33	Gregory Webber	N/A	gregwebber45@gmail.com	15 Green Street, Newtown
34	Colin Roy Miller	N/A	citicarwellington@xtra.co.nz	8 Saint Hildas Glade, Tawa, Wellington 5028
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List of Submitters and Contact Details - Numerical Order

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40	New Zealand Agricultural Aviation Association	Tony Michelle	eonzaaaa@aviationnz.co.nz	224 Mill Road South, Invercargill 9871
41	Peter Hill	N/A	p.hill@actrix.co.nz	2A Oak Grove, Mount Cook
42	Peter Preston	N/A	pd.preston@xtra.co.nz	107 Austin Street, Mt Victoria, Wellington 6011
43	Karen Serjeantson	N/A	kserjeantson@hotmail.com	95 Grafton Road, Roseneath, Wellington
44	Paul Burnaby	N/A	pburnaby@cambiumlabs.com	29 Greenstone Place, Fernhill, Queenstown
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48	Margaret Ellis	N/A	margaret.ellis375@gmail.com	375 Middleton Road, Glenside 6037
49	Shailesh Kumar Patel	N/A	shailesh3941@yahoo.co.nz	69 Miro Street, Miramar, Wellington 6022
50	Lilias Bell	N/A	lilias.bell@gmail.com	40 Colway Street, Ngaio
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53	Michael Hamilton	N/A	michael@gentoo.co.nz	18 Scapa Terrace, Karori, Wellington 6012
54	Trace Quinn	N/A	tracerebecca@gmail.com	61 Houghton Bay, Melrose, Wellington
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56	James Barber	N/A	barberjames8891@gmail.com	18 Hiropi Street, Newtown, Wellington
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58	Phil Kelliher	N/A	pckelliher@gmail.com	13 Porritt Avenue, Mt Victoria 6011
59	Andrew Gall	N/A	andrew@gall.net.nz or WCC@gall.net.nz	110 Mitchell Street, Brooklyn, Wellington
60	Judith Ellen Bleach	N/A	judebleachnz@gmail.com	98 Owen Street, Newtown, Wellington 6021
61	Nick Ruane	N/A	nick@ruane.co.nz	47 Mornington Road, Brooklyn 6021
62	Coronation Real Estate Ltd	Corinna Tessendorf (Urban Edge Planning Ltd)	Corinna@urbanedgeplanning.co.nz	Urban Edge Planning PO Box 39071 Wellington Mail Centre, Lower Hutt 5045
63	Susan Rotto	N/A	suerottoilg@gmail.com	10 The Crescent, Roseneath 6011
64	Stephen Pause	N/A	stephen.pause@gmail.com	37 Rothsay Road, Ngaio
65	Melissa Harward	N/A	melissa.harward96@gmail.com	4/464 Adelaide Road, Berhampore 6023
66	Graham Mexted (No 2) Family Trust	Murray Graham Mexted Andrew Henderson (Treadwells Barristers and Solicitors)	murray@mexted.co.nz andrew@treadwells.co.nz	Treadwells, PO Box 859, Wellington 6140
67	George North	N/A	cynosure.north@gmail.com	239 The Terrace, Te Aro 6012
68	Juliet Cooke	N/A	juliet@intouchdesign.co.nz	111 Cockayne Road, Khandallah
69	Brett McKay	N/A	brett.mckay.46@gmail.com	50 Russell Terrace, Berhampore, Wellington 6023

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70	Heritage New Zealand Pouhere Taonga	Dean Raymond	draymond@heritage.org.nz	Heritage New Zealand Pouhere Taonga Takiwā o Te Pūtahi a Māui PO Box 2629, Wellington 6140
71	Tawa Residential Ventures Ltd	Michael Lee	michael@pennylee.co.nz	PO Box 30-528, Lower Hutt
72	Lucy Telfar Barnard	N/A	Lftbarnard@gmail.com	27 Picton Avenue, Newtown 6021
73	Turi & Jane Park	N/A	turi@nativebrand.co	5/5 Tory Street, Te Aro, Wellington 6001
74	Tracey Paterson	N/A	tmpaterson250@gmail.com	10 Moir Street, Mt Victoria, Wellington 6011
75	Tim Bright	N/A	timbright@xtra.co.nz	4 Gloucester Street Wilton Wellington 6012
76	Conor Hill	N/A	hillconor@gmail.com	The Coalition for More Homes, Wadestown 6012
77	Nico Maiden	N/A	nicoloriermaiden@gmail.com	5 Valley Street, Island Bay 6023
78	Ngatiawa Russell Masonic Lodge 345	Barry Shepherd	barry_shepherd@hotmail.com	39 Everest Street, Khandallah 6035
79	Ian Attwood	N/A	ianattwood@gmail.com	18 Vera Street, Karori 6012
80	Judith Graykowski	N/A	jgraykowski@outlook.com	Apartment 6, 123-125 Austin Street, Mt Victoria, Wellington 6011
81	Ann Mallinson	N/A	mallinsonann@hotmail.com	4/248 Oriental Parade, Wellington 6011
82	David Stephen	N/A	davidjstephen@gmail.com	94 Burma Road, Khandallah
83	Oranga Tamariki	Kate Graham (Beca Limited)	kate.graham@beca.com	Beca, Level 2 (ANZ Centre) 267 High Street, Christchurch 8011
84	Rowan Hannah	N/A	rowan@planit.nz	329 Middleton Road, Glenside
85	Joanna Newman	N/A	Jonewman@xtra.co.nz	20 Porritt Avenue, Mt Victoria, Wellington 6011
86	Angus Hodgson & Sebastian Clarke	N/A	angusbhodgson@gmail.com	61 Hankey Street, Wellington
87	Aro Valley Community Council	Jaqui Tutt	jaquitutt@gmail.com	25 Epuni Street, Aro Valley, Wellington 6021
88	Chorus New Zealand Limited	Andrew Kantor	andrew.kantor@chorus.co.nz	PO Box 6640, Auckland 1010
89	Rachel Marr	N/A	marrfamilynz@gmail.com	47 Chamberlain Road, Karori 6012
90	Hugh Good	N/A	hughgood@gmail.com	8 Rama Crescent, Khandallah
91	Capital Kiwi Trust Board	Paul Ward	paul@capitalkiwi.co.nz	25 Owen Street, Newtown, Wellington 6021
92	Paul Van Houtte		district.plan@wcc.govt.nz	
93	Amanda Wang	N/A	N/A	28B Roxburgh Street, Mt Victoria
94	Susan Birch	N/A	N/A	25A Campbell Street, Karori
95	John Lin	N/A	linwhua@yahoo.com	11 Ngatitoa Street, Tawa
96	Interprofessional Trust	Daryl Cockburn	darylcockburn@icloud.com	Palazzo 42 Vivian Street, Wellington 6011
97	Tim Brown	N/A	Tbroselnf@gmail.com	37 Queens Drive, Lyall Bay
98	M J & P B Murtagh	N/A	murtagh.mj@gmail.com	67 Roxburgh Street, Wellington 6011
99	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	Chris Horne (Beca Limited)	chris@incite.co.nz	Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited C/- Incite P O Box 3082, Auckland 1140
100	Airways Corporation of New Zealand Limited	Michael Connolly	michael.connolly@airways.co.nz	Airways 50 Tacy Street, Kilbirnie, Wellington 6022
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102	Jeremy Partridge	N/A	jez.partridge@yahoo.co.nz	159 West Street, Greytown 5712
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104	Quayside Property Trust	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	Spencer Holmes 57 Willis Street, Te Aro 6011
105	292 Main Road Limited	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	Spencer Holmes 57 Willis Street, Te Aro 6011
106	Te Herenga Waka Victoria University of Wellington	Francelle Lupis / Claire Wills (Greenwood Roche)	francelle@greenwoodroche.com cwills@greenwoodroche.com	Francelle Lupis / Claire Wills Greenwood Roche Level 12, 2 Commerce Street, Auckland 1010
107	Tawa Business Group	Sophie Glendinning (Orogen Limited)	sophie.glendinning@orogen.nz	PO Box 56051, Tawa
108	Wakefield Property Holdings Ltd	Sophie Glendinning (Orogen Limited)	sophie.glendinning@orogen.nz	PO Box 56051, Tawa
109	Kirsty Wood	N/A	kmtwood@icloud.com	34 McFarlane Street, Mt Victoria, Wellington
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122	The Gibson Group Limited	Gary Scott	gary@gibson.co.nz	199 Melbourne Road, Island Bay
123	Victoria University of Wellington Students' Association	Katherine Blow	engagement@vuwsa.org.nz	Victoria University of Wellington Level 4, Student Union Building PO Box 600, Kelburn, Wellington 6140
124	Darko Petrovic	N/A	Darkopetrovic@gmail.com	5/12 Stanley Street Berhampore 6023 New Zealand
125	David Fisher	N/A	morgan.fisher@xtra.co.nz	127 Grafton Road, Roseneath 6011 New Zealand
126	Airbnb	Dylan Schwartz	dylan.schwartz@ext.airbnb.com	Level 4/60 Reservoir Street, Surry Hills, NSW 2010
127	Powerco Limited	Gary Scholfield	planning@powerco.co.nz	Powerco Limited PO Box 13 075, Tauranga 3141 Attention: Gary Scholfield

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128	Oriental Bay Residents Association Inc	Andrew Meehan	armeehan@xtra.co.nz	Oriental Bay Residents Association Level 8, Midland Chambers 45 Johnson Street, Wellington 6011
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138	Ella Patterson	N/A	ellapatterson96@gmail.com	3/199 The Terrace, Te Aro, Wellington
139	Precinct Properties New Zealand Limited	Joe Jeffries (Barker & Associates Ltd)	joej@barker.co.nz	Precinct Properties New Zealand Limited c/- Barker & Associates Ltd, Attention: Joe Jeffries Level 3, Suite 3 Brandon House, 149 Featherston Street, Wellington 6011
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202	Avryl Bramley	N/A	avryl@ajb.co.nz	PO Box 2904, Mt Victoria, Wellington
203	Halfway House Heritage Gardeners	Claire Bibby	info@glenside.org.nz cbibby@orcon.net.nz	1 Westchester Drive, Glenside
204	Kim McGuinness, Andrew Cameron, Simon Bachler, Deb Hendry, Penny Evans, Stephen Evens, David Wilcox, Mary Vaughan Roberts, Siva Naguleswaran, Mohammed Talim, Ben Sutherland, Atul Patel, Lewis Roney Yip, Sarah Collier Jaggard	Kim McGuinness	kimm McGuinness@hotmail.com	28 Stoke Street, Newtown 6021
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208	Nicola Crauford	N/A	nicki@riposte.org.nz	22 Vera Street, Karori, Wellington 6012
209	Jaqui Tutt	N/A	jaquitutt@gmail.com	25 Epuni Street, Aro Valley, Wellington 6021
210	Craig Forrester	N/A	cforresterxyz@gmail.com	5 Moir Street, Mt Victoria 6011
211	Graham Spargo	N/A	graham.spargo@gsp.co.nz	132 Lyall Parade Lyall Bay 6022
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215	Nga Kaimanaaki o te Waimapihi	James Mitford Taylor	jamesmitfordtaylor@gmail.com	84 Upland Road, Kelburn 6012
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218	Jil Wilson	N/A	jillcwa@gmail.com	Museum Apartments 806/257 Wakefield Street, Te Aro 6011
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220	Boston Real Estate Limited	Cameron de Leijer (Spencer Holmes) Hamish Tweedie	cpd@spencerholmes.co.nz htweedie@gmail.com	57 Willis Street, Te Aro 6011 92 Queens Drive, Lyall Bay, Wellington
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227	RR Ventures (2018) Ltd	Ruchir Goel	rrventures.2018@gmail.com	166 Glanmire Road (Part Lot 8 DP 2205), Newlands
228	Meridian Energy Limited	Christine Foster (CF Consulting Services Limited)	christine@cfconsulting.co.nz andrew.guerin@meridianenergy.co.nz	21 Ashton Fitchett Drive, Brooklyn, Wellington 6021
229	David Walmsley	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
230	Lorraine and Richard Smith	N/A	griffinlorraine14@gmail.com	3 Talavera Terrace, Kelburn
231	Keith Clement	N/A	keithc.omega@gmail.com	PO Box 28077, Kelburn, Wellington
232	Richard W Keller	N/A	rwk.trip11@gmail.com	13 Endeavour Street, Lyall Bay
233	Wellington's Character Charitable Trust	Felicity Wong Duncan Ballinger (Stout Street Chambers)	felicity_wong@icloud.com	21 Hay Street, Thorndon
234	Gabriela Roque-Worcel	N/A	gabrielamelian@gmail.com	11 Ontario Street, Kingston, Wellington 6021
235	Victoria Stace	N/A	Vctrstc18@gmail.com	16 Hay Street, Oriental Bay, Wellington
236	Go Media Ltd	Alex Booker	alex.booker@al.nz	Level 3, 70 Gloucester Street PO Box 13831, Christchurch 8140
237	Pukepuke Pari Residents Incorporated	Victoria Stace	Vctrstc18@gmail.com	16 Hay Street, Oriental Bay, Wellington
238	Century Group Limited	Anthony Blomfield (Bentley & Co Ltd)	ablomfield@bentley.co.nz	PO Box 4492, Shortland Street, Auckland 1140
239	Regan Dooley	N/A	regandooley@gmail.com	12 Liffey Crescent, Island Bay, Wellington
240	Ara Poutama Aotearoa the Department of Corrections	Andrea Millar Sean Grace (Boffa Miskel)	andrea.millar@corrections.govt.nz (sean.grace@boffamiskell.co.nz)	Private Box 1206, Wellington 6140
241	Karepa Dell Developments	Hamish Tweedie	htweedie@gmail.com	57 Willis Street, Te Aro 6011 92 Queens Drive, Lyall Bay, Wellington
242	Alan Fairless	N/A	fairlessaj@gmail.com	25 Epuni Street, Aro Valley, Wellington 6021
243	Cheryl Crooks	N/A	cherylamcrooks@gmail.com	100 Wilson Street, Newtown, Wellington 6021
244	Richard Martin	N/A	richardj.martin@xtra.co.nz	4 Baring Street, Oriental Bay
245	Paul Ridley-Smith		district.plan@wcc.govt.nz	
246	Adam King	Emily Hu (MorrisonKent)	emily.hu@morrisonkent.com adkhongkong@hotmail.com	9 Upton Terrace, Thorndon, Wellington
247	Richard Norman	N/A	richardnorman.nz@outlook.com	1 Stafford Street, Mt Victoria, Wellington
248	Peter Charlesworth	Elliott Thornton (Cuttriss Consultants Limited)	charlesworth@xtra.co.nz elliott.thornton@cuttriss.co.nz	11B Wilmshurst Place, Tawa
249	Stratum Management Limited	Mitch Lewandowski (Building Block Planning Limited)	Mitch@bbplanning.co.nz	Stratum Management Limited C/- Building Block Planning Limited 8A Travancore Street Island Bay, Wellington 6140
250	Friends of the Bolton St Cemetery Inc	Priscilla Williams	priscillawilliams.nz@gmail.com	14 Kinross Street, Kelburn, Wellington 6012
251	Cherie Jacobson	Cherie Jacobson	cheriejacobson@gmail.com	117 Campbell Street, Karori, Wellington 6012
252	Friends of Khandallah	Martin S Jenkins	apdc1@outlook.com	41A Simla Crescent, Khandallah
253	Massey University	Max Pocock (WSP)	max.pocock@wsp.com	100 Willis Street, Level 9, 6011
254	Generation Zero Inc	Annalies Veldmeijer	wellington@generationzero.org.nz	2 Forresters Lane, Te Aro, 6011

List of Submitters and Contact Details - Numerical Order

Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
255	Graeme Webster	N/A	grsrweb@gmail.com	26 Robieson Street, Roseneath 6011
256	Prime Property Group	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
257	Pauletta Wilson	N/A	paulettawilson@gmail.com	13 Yale Road, Mount Cook, Wellington
258	Vital Healthcare Property Trust	Drugh Woods Matt Norwell, Cassandra Rippon (Barker & Associates)	drugh.woods@nwhreit.com matttn@barker.co.nz cassandrar@barker.co.nz	PO Box 1986, Shortland Street, Auckland 1140
259	Design Network Architecture Limited	Laura Gaudin	planning@designnetwork.co.nz	PO Box 30614, Lower Hutt 5040
260	Dominic Hurley	N/A	dominic.hurley27@gmail.com	15 Awarua Street, Ngaio, Wellington 6035
261	Wheeler Grace Trust	Michael Russell Ian Grace and William Russell Grace	mgracee@yahoo.com	N/A
262	Jim & Christine Seymour	N/A	jim.christine78@gmail.com	69 Roxburgh Street, Mt Victoria
263	Johnsonville Masonic Hall	Dave Henry	Dave@henryservices.co.nz	PO Box 7189, Wellington 6242
264	Mike Robbers	N/A	mikeroobers@gmail.com	18 Lawrence Street, Newtown
265	Dean Knight and Alan Wendt	N/A	karikihina@gmail.com	4 Salisbury Garden Court, Wadestown, Wellington
266	Wellington City Council	Barbara McKerrow, Chief Executive	district.plan@wcc.govt.nz	Wellington City Council, PO Box 2199, Wellington 6140
267	170 Wakefield Limited	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
268	CAMJEC Commercial Limited	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
269	Rongotai Investments Limited	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
270	Everard Aspell	N/A	everard.aspell@raywhite.com	34 Bayview Terrace Oriental Bay
271	Horokiwi Quarries Ltd	Pauline Whitney (Boffa Miskell)	pauline.whitney@boffamiskell.co.nz	PO Box 11340, Wellington 6142
272	Aimee Poy	N/A	apoy@xtra.co.nz	134 Burma Road, Johnsonville
273	Fire and Emergency New Zealand	Jennifer Bearsall	Jennifer.Bearsall@beca.com	N/A
274	McDonald's	Alice Hosted and Matt Norwell (Barker & Associates)	aliceh@barker.co.nz matttn@barker.co.nz	PO Box 1986, Shortland Street, Auckland 1140
275	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	Claire Nolan, James Fraser, Margaret Franken	cla.nols@outlook.com jamesfraser.avantgardener@gmail.com margaret.franken@gmail.com	N/A
276	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	Heidi Snelson	heidi.bluefish@gmail.com	70 Rowells Road Glenside 6037
277	Mary Sullivan	N/A	mary.therese@xtra.co.nz	33 Prospect Terrace Johnsonville 6037
278	Bernard Palamountain	N/A	bernard.palamountain1@gmail.com	47 Austin Street, Mount Victoria
279	Laura Gaudin	N/A	laurargaudin@gmail.com	N/A
280	Richard Hovey	N/A	Richhoveynz@gmail.com	32 Clarence Street, Brooklyn, Wellington 6021
281	Marilyn Powell	N/A	Molly.empow@gmail.com	43 Hobson Street, Thorndon
282	Toka Tū Ake EQC	Jo Horrocks	resilience@eqc.govt.nz	PO Box 311, Wellington 6140

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283	Onslow Residents Community Association	Lawrence Collingbourne	onslowcommunityassn@gmail.com	54 Waru Street, Khandallah, Wellington
284	Out of Home Media Association of Aotearoa	Anthony Blomfield (Bentley & Co Ltd)	ablomfield@bentley.co.nz	PO Box 4492, Shortland Street, Auckland 1140
285	Lumo Digital Outdoor Limited	Anthony Blomfield (Bentley & Co Ltd)	ablomfield@bentley.co.nz	PO Box 4492, Shortland Street, Auckland 1140
286	Jane Hurley	N/A	jane.hurley@xtra.co.nz	N/A
287	Eldin Family Trust	Duncan Ballinger (Duncan Ballinger Stout Street Chambers), The Hon Sir Douglas White KC, John Meads and Dan Williams	duncan.ballinger@stoutstreet.co.nz, greenock@outlook.co.nz	Stout Street Chambers, 6th floor, Huddart Parker Building No 1 Post Office Square, PO Box 117, Wellington 6140 9 Selwyn Terrace, Thorndon
288	Steve Dunn	N/A	Steve.dunn025@gmail.com	1 Nikau Street, Newtown, Wellington 6021
289	Phillippa O'Connor	Susie Clemens (Forme Planning Limited)	susie@formeplanning.co.nz	Forme Planning PO Box 24463, Royal Oak, Auckland 1345
290	Kilmarston Developments Limited and Kilmarston Properties Limited	Milcah Xkenjik (Land Matters)	milcah@landmatters.nz	20 Addington Road, Otaki
291	Parsons Green Trust	Jessica Andrews (The Planning Collective Limited)	Jessica@thepec.co.nz	Parsons Green Trust C/- The Planning Collective PO Box 591, Warkworth Attn: Jessica Andrews
292	Poneke Architects	Nic Ballara	nic.ballara@poneke.nz	Level 6, 85 Victoria Street, Te Aro, Wellington
293	Priscilla Williams	N/A	priscillawilliams.nz@gmail.com	14 Kinross Street, Kelburn, Wellington 6012
294	Tawa Community Board	Robyn Parkinson (Chair of TCB)	robyn.parkinson@wcc.govt.nz or rparkinson.nz@gmail.com	N/A
295	Dawid Wojasz	N/A	dawid.wojasz@gmail.com	130 Northland Road, Northland, Wellington
296	Johanna Carter	N/A	pcarter@carterfamily.nz	66 Raroa Road, Kelburn, Wellington 6012
297	Tapu-te-Ranga Trust	Papuwai Porter-Samuels	papuwai@outlook.com	N/A
298	Parkvale Road Limited	Mitch Lewandowski (Building Block Planning Limited)	Mitch@bbplanning.co.nz	Parkvale Road Limited C/- Building Block Planning Limited 8A Travancore Street, Island Bay, Wellington 6140
299	Wellington Branch of the New Zealand Deerstalkers	Mark Heath	nzdawellingtonbranch@gmail.com	Wellington Branch NZDA
300	Matthew Plummer	N/A	matthew.plummer@gmail.com	70 Wright Street, Mount Cook
301	Wellington Branch NZIA	Ric Slessor	ric@slessorarchitects.co.nz	PO Box 27165 Marion Square, Te Aro
302	Paihikara Ki Pōneke Cycle Wellington	Patrick Morgan	info@cyclewellington.org.nz	N/A
303	Aggregate and Quarry Association	Jeremy Harding	jeremy@straterra.co.nz	PO Box 10 668
304	Firstgas Limited	Hywel Edwards	Hywel.Edwards@beca.com	Wood+Beca Limited P.O Box 264, Taranaki Mail Centre, New Plymouth 4340
305	Roland Sapsford	N/A	roland@actrix.gen.nz	23 Epuni Street, Aro Valley, Wellington 6021
306	Wilma Sherwin	N/A	wilma.sherwin@outlook.com	39 Cockayne Road, Khandallah
307	James Coyle	N/A	j.coyle@massey.ac.nz	1/122 Owen Street, Newtown 6021

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308	Svend Heeselholt Henne Hansen	N/A	svendhhh@gmail.com	6/2 Onslow Road, Khandallah, Wellington 6035
309	David Karl	N/A	davedkarl@gmail.com	N/A
310	Philip O'Reilly and Julie Saddington	Linda Bruwer (LB-Urban)	linda@lb-urban.co.nz	41 Spyglass Lane, Whitby Porirua
311	Rod Bray	N/A	rod@northbridgeproperties.co.nz	34 Park Road, Glenfield, Auckland
312	Moir Street Collective - Dougal List, Libby List, Karen Young, Jeremy Young, James Fairhall, Karen Fairhall, Craig Forrester, Sharlene Gray	Dougal List	dougal.list@gmail.com	21 Moir Street, Mt Victoria, Wellington
313	Lisa Nickson, Garrick Northover and Warren Sakey	Lisa Nickson	lisa.nickson@gmail.com	135 Aro Street, Aro Valley
314	New Zealand Motor Caravan Association	James	james@nzmc.org.nz	4 Graham Road, Takanini, Auckland 2112
315	Transpower New Zealand Limited	Dan Hamilton	environment.policy@transpower.co.nz	Transpower New Zealand Limited Environmental Policy and Planning Group PO Box 1021, Wellington
316	oOh!Media Street Furniture New Zealand Limited	Anthony Blomfield (Bentley & Co Ltd)	ablomfield@bentley.co.nz	PO Box 4492, Shortland Street, Auckland 1140
317	Penelope Borland	N/A	Misspenelopeborland@gmail.com	22 Earls Terrace, Mt Victoria, Wellington 6011
318	Rimu Architects Ltd	Bruce Welsh	office@rimu.org.nz	92 Yule Street, Kilbirnie, Wellington 6022
319	Bruce Crothers	N/A	drhifibcc@gmail.com	590 Makara Road, Karori 6972
320	Bus Barn Limited	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
321	Hilary Watson	N/A	Hilarywatson108@gmail.com	5 Corunna Avenue, Newtown, Wellington
322	Richard Murcott	N/A	richard.murcott@gmail.com	64 Hobson Street, Thorndon 6011
323	Joan Fitzgerald	N/A	joaneez@gmail.com	590 Makara Road, Karori 6972
324	Shelly Bay Road Limited	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
325	Craig Erskine	N/A	craig.erskin@corrections.govt.nz	15 Rua Street, Lyall Bay 6022
326	Khoi Phan	N/A	hkhoiphon@gmail.com	4B/1 Hanson Street, Mt Cook 6021
327	Richard Benge	N/A	richard.benge@artsaccess.org.nz	Unit 6, 33 Hiropi Street, Newtown 6021
328	Tawa Residents Association	Tony Hassed	tony@hassed.nz	5 Cambridge Street, Tawa
329	Claire Bibby	N/A	cbibby@orcon.net.nz	1 Westchester Drive, Glenside
330	Julie-Anne Daysh	N/A	jd.orangedoors@gmail.com	178 Victoria Street, Te Aro, Wellington 6011
331	Mt Cook Mobilised	Carol Comber	mtcookmobilised@gmail.com	PO Box 9724, Wellington 6141
332	Trevor Farrer	N/A	hcity@xtra.co.nz	Mary Huse Grove, Manor Park, Lower Hutt
333	Thorndon Residents' Association	N/A	contact@thorndon.org.nz	PO Box 12282, Thorndon 6144
334	Bruce Rae	N/A	brucew.rae@xtra.co.nz	1A Civic Chambers 25 Cuba Street, Te Aro, Wellington 6011
335	Cho Yam Chan	N/A	cares4property@gmail.com	178 Victoria Street, Te Aro, Wellington
336	Kerry Finnigan	N/A	Kerry.finnigan@hotmail.com	41 Coromandel Street, Newtown
337	Te Marama Ltd	Michael Grace	mgracee@yahoo.com	171 South Makara Road, Wellington 6972

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338	Property Council New Zealand	Sandamali Gunawardena	sandamali@propertynz.co.nz	N/A
339	The Sustainability Society	Stu Farrant (Morphum Environmental)	stu.farrant@morphum.com	16 Henry Street, Kilbirnie
340	Yvonne Weeber	N/A	weebery@gmail.com	143 Queens Drive, Lyall Bay, Wellington 6022
341	Tina Reid	N/A	tinareid17@outlook.com	10 Tainui Terrace, Mt Cook, Wellington 6021
342	Mt Victoria Residents' Association	Angela Rothwell	mtvicra@gmail.com	N/A
343	Disabled Persons Assembly New Zealand Incorporated	Chris Ford	chris.ford@dpa.org.nz	PO Box 27-524, Marion Square, Wellington 6141
344	Carolyn Stephens	N/A	stephens.carolyn@gmail.com	4A Wilkinson Street, Oriental Bay, Wellington
345	Royal Forest and Bird Protection Society	Amelia Geary	a.geary@forestandbird.org.nz	205 Victoria Street, Wellington 6011
346	Ryman Healthcare Limited	Luke Hinchey and Marika Williams (Chapman Tripp) Hannah Okane (Mitchell Daysh)	luke.hinchey@chapmantripp.com marika.williams@chapmantripp.com Hannah.okane@mitchelldaysh.co.nz	c/o Chapman Tripp, Level 34, PwC Tower PO Box 2206, Auckland CBD
347	Wayne Coffey and Gregory Young	N/A	waynescoffey@gmail.com greg.young@wsp.com	190 Oriental Parade, Oriental Bay 6011 134 Sutherland Road, Melrose 6023
348	Kimberley Vermaey	N/A	kimberley.vermaey@gmail.com	42A Cambridge Terrace, Waiwhetu Lower Hutt
349	Restaurant Brands Limited	Mark Arbuthnot (Bentley & Co Ltd)	marbuthnot@bentley.co.nz	Bentley & Co. Ltd PO Box 4492 Shortlan Street, Auckland 1140
350	Retirement Villages Association of New Zealand Incorporated	Luke Hinchey and Marika Williams (Chapman Tripp) Hannah Okane (Mitchell Daysh)	luke.hinchey@chapmantripp.com marika.williams@chapmantripp.com Hannah.okane@mitchelldaysh.co.nz	c/o Chapman Tripp Level 34 PwC Tower, PO Box 2206, Auckland CBD
351	Greater Wellington Regional Council	Mika Zollner	mika.zollner@gw.govt.nz	100 Cuba Street, Te Aro, Te Whanganui-a-Tara 6011
352	Inner City Wellington	Rev Stephen King	frstephenk@gmail.com	St Peter's Anglican Church 211 Willis Street
353	Peter Kennedy	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
354	John Bryce	N/A	johndbryce@gmail.com	93 Holloway Road, Aro Valley, Wellington 6021
355	Wellington Electricity Lines Limited	Tim Lester	tim.lester@edison.co.nz	Wellington Electricity Lines Limited c/- Edison Consulting Group Ltd PO Box 875, Hamilton 3240
356	Lower Kelburn Neighbourhood Group	Rosalind McIntosh	flowingmountains@yahoo.com	11 Wesley Road, Kelburn, Wellington 6012
357	Richard Tyler	N/A	tyler.wn@xtra.co.nz	34 Hawker Street, Mt Victoria 6011
358	Wharenui Apartments Ltd	Cameron de Leijer (Spencer Holmes)	cpd@spencerholmes.co.nz	57 Willis Street, Te Aro 6011
359	Woolworths New Zealand	Susie Clemens (Forme Planning Limited)	susie@formeplanning.co.nz	Level 10, 11 Britomart Place, Auckland
360	Richard Herbert	N/A	herbert.r@xtra.co.nz	N/A
361	Z Energy Limited	Jarrod Dixon (4Sight Consulting)	jarrod.dixon@4sight.co.nz	PO Box 2091, Wellington 6140
362	Te Kamaru Station Ltd Ratings	Michael Grace	mgracee@yahoo.com	N/A
363	Wellington Tenth's Trust	Vicki Hollywell	vicki@tekau.maori.nz	24D Marine Parade, Petone 5012
364	Wētā FX	Michael McNeil	mneil@wetafx.co.nz	127 Wexford Road, Miramar 6022

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365	Josephine Brien / Tim Bollinger	N/A	josephinebrien@gmail.com tim.bollinger@dia.govt.nz	3 Palmer Street, Aro Valley, Wellington 6011 182 Abel Smith Street, Te Aro, Wellington 6011
366	U.S. Embassy Wellington	Christopher Pritchett	pritchettcd@state.gov	29 Fitzherbert Terrace, Thorndon, Wellington 6011
367	Sarah Walker	N/A	spwontour@hotmail.com	404/38 Jessie Street, Te Aro, Wellington
368	Elizabeth Nagel	N/A	elizabeth.nagel@gmail.com	72 Rolleston Street, Mt Cook, Wellington 6021
369	Jane Szentivanyi and Ben Briggs	N/A	janesziggs@gmail.com	5A Doctors Common, Mt Victoria, Wellington 6011
370	Waka Kotahi	Mike Scott	mike.scott@nzta.govt.nz	Majestic Centre, Level 7, 100 Willis Street PO Box 5084, Wellington 6140, New Zealand
371	Strathmore Park Residents Association Inc	Glenn Kingston	gkingston@xtra.co.nz	53 Tannadyce Street, Strathmore Park, Wellington 6022
372	BP Oil New Zealand, Mobil Oil New Zealand Limited and Z Energy Limited (the Fuel Companies)	Jarrod Dixon (4Sight Consulting)	jarrod.dixon@4sight.co.nz	4Sight Consulting Limited 201 Victoria Street West, Auckland 1010
373	Envirowaste Services Ltd	Kaaren Rosser	kaaren.rosser@environz.co.nz	PO Box 92810, Penrose, Auckland 1642
374	Glenside Progressive Association Inc	Barry Blackett	info@glenside.org.nz	1 Westchester Drive, Glenside
375	Parliamentary Service	David Wills	david.wills@parliament.govt.nz	c/o Parliamentary Service Private Bag 18041, Wellington 6160
376	Jane Szentivanyi	N/A	janesziggs@gmail.com	31 Moir Street, Mt Victoria, Wellington 6011
377	WCC Environmental Reference Group	Shannon Wallace Michelle Rush Leteicha Lowry	wallace.shannon.r@gmail.com rush.m@xtra.co.nz Leteicha.Lowry@wcc.govt.nz	N/A
378	Henry Bartholomew Nankivell Zwart	N/A	henrybzwart@gmail.com	7 Upoko Road, Hataitai, Wellington 6021 2 Roxburgh Grove, Petone, Lower Hutt 5012
379	Muaūpoko Tribal Authority Inc	Tom Bennion	tom@bennion.co.nz	Level One, 1 Ghuznee Street, Wellington
380	Southern Cross Healthcare Limited	Bianca Tree / Amy Dresser (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz amy.dresser@minterellison.co.nz	Southern Cross Healthcare Limited c/- MinterEllisonRuddWatts PO Box 105249, Auckland 1143
381	Caniwi Properties (Boomrock) Limited	Bryce Holmes (Land Matters)	bryce@landmatters.nz	20 Addington Road, Otaki
382	Margaret Cochran	N/A	margaret@thewedge.co.nz	20 Glenbervie Terrace, Thorndon, Wellington 6011
383	Argosy Property No. 1 Limited	Bianca Tree / Amy Dresser (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz amy.dresser@minterellison.co.nz	Argosy Property No.1 Limited c/- MinterEllisonRuddWatts PO Box 105249, Auckland 1143
384	Donna Sherlock	N/A	okar09@gmail.com	110 Rowells Road, Glenside, Wellington
385	Director-General of Conservation	Ashiley Sycamore	asycamore@doc.govt.nz	Private Bag 3072, Hamilton 3240
386	Tawa Historical Society	David Parsons	tawaparsons@xtra.co.nz	Tawa 5249
387	Sue Kedgley	N/A	sue@suekedgley.com	294 Oriental Parade, Oriental Bay
388	Wellington Civic Trust	Sylvia Allan	secretary@wellingtoncivictrust.org	PO Box 10183, Wellington
389	Taranaki Whānui ki te Upoko o te Ika	Lee Hunter	lee@portnicholson.org.nz	Tramway Building, Level 3 1-3 Thorndon Quay, Wellington 6011
390	Grace Ridley-Smith	N/A	gracie.ridleysmith@gmail.com	5/17 Brougham Street, Mt Victoria, Wellington 6011
391	Kāinga Ora Homes and Communities	Kāinga Ora	developmentplanning@kaingaora.govt.nz	PO BOX 2628, Wellington 6140
392	Richard Tweedie	N/A	rgtweedie@gmail.com	N/A

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394	Matthew Tamati Reweti	N/A	matthew.reweti@gmail.com	N/A
395	Stephen Minto	N/A	Stephennpm@gmail.com	4/123 Austin Street, Mount Victoria, Wellington 6011
396	350 Wellington	Ariarne Davy	wellington@350.org.nz	57 Rintoul Street, Newtown
397	Jonathan Anderson	N/A	deb.jon.ao@gmail.com	3 Quetta Street, Ngaio, Wellington 6035
398	David Cadman	N/A	davidcadman99@gmail.com	358 Tinakori Road, Thorndon, Wellington 6011
399	Elliott Thornton	N/A	Elliott.Thornton@gmail.com	16 Arawa Road, Hataitai
400	Ministry of Education	Zach Chisam (Beca Limited)	zach.chisam@beca.com	Beca Ltd, PO Box 3942, Wellington 6140
401	Lucy Harper and Roger Pemberton	N/A	rogerpemberton10@gmail.com	5 Vogel Street, Mount Victoria
402	CentrePort Limited	William Woods	william.woods@centreport.co.nz	CentrePort Limited, PO Box 794, Wellington 6140
403	Friends of Owhiro Stream (FOOS)	Martin Payne	martin.paynz@gmail.com	160 Washington Avenue, Brooklyn, Wellington 6021
404	Oyster Management Limited	Amy Dresser/Bianca Tree (MinterEllisonRuddWatts)	amy.dresser@minterellison.co.nz/bianca.tree@minterellison.co.nz	N/A
405	Investore Property Limited	Amy Dresser/Bianca Tree (MinterEllisonRuddWatts)	amy.dresser@minterellison.co.nz/bianca.tree@minterellison.co.nz	N/A
406	Wellington International Airport Ltd	Kirsty O'Sullivan (Michael Daysh)	kirsty.osullivan@mitchelldaysh.co.nz	Mitchell Daysh Limited PO Box 489, Dunedin 9054
407	Guy Marriage	N/A	guy.marriage@vuw.ac.nz	33 Frederick Street, Te Aro, Wellington 6011
408	KiwiRail Holdings Limited	Sheena McGuire	Sheena.McGuire@kiwirail.co.nz	Wellington Railway Station, Bunny Street, Wellington 6011 PO Box 593, Wellington 6140
409	Cheryl Robilliard	N/A	cheryl@paos.co.nz	1 Nikau Street, Newtown, Wellington 6021
410	Emma Osborne	N/A	emma.kuperus@gmail.com	33 Finnimore Terrace, Vogeltown, Wellington
411	Terawhiti Farming Co Ltd (Terawhiti Station)	Michael Grace, Joanna Grace, Sarah Grace (Grace Family)	mgracee@yahoo.com	900 South Makara Road, Makara
412	Wellington Heritage Professionals	Amanda Mulligan	amanda_mulligan@yahoo.com.au	7 Waitoa Road, Hataitai, Wellington 6021
413	Metlifecare Limited	Bianca Tree (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz	Metlifecare Limited c/- MinterEllisonRuddWatts PO Box 105 249, Auckland 1143
414	VicLabour	Henry Lockhart	henrylockhart787@gmail.com	N/A
415	Sarah Cutten and Matthew Keir	N/A	sarah.cutten@gmail.com	28 Robieson Street, Roseneath Wellington 6011
416	Willis Bond and Company Limited	Jimmy Tait Jamieson	jimmy@willisbond.co.nz	Free Ambulance Building Level 2, 5 Cable Street, Wellington
417	Thomas John Broadmore	N/A	thomas.broadmore@gmail.com	N/A
418	Penny Griffith	N/A	griffith.penny@gmail.com	Wharenuui 5D / 274 Oriental Parade, Oriental Bay, Wellington 6011
419	Josephine Smith	N/A	Josienagel@gmail.com	72 Rolleston Street, Mt Cook, Wellington 6021
420	The Urban Activation Lab of Red Design Architects	Martin Hanley	123martinh@gmail.com	123 Daniell Street, Newtown, Wellington 6021
421	Donna Yule	N/A	donna.y@xtra.co.nz	N/A
422	Luke Stewart	N/A	luke@stewart.geek.nz	42 Pembroke Road, Northland, Wellington
423	New Zealand Defence Force	Rebecca Davies	Rebecca.davies@nzdf.mil.nz	C/- Tonkin + Taylor PO Box 13055, Christchurch

List of Submitters and Contact Details - Numerical Order

Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
424	Paul Gregory Rutherford	N/A	prutherford.nz@gmail.com	4A Wilkinson Street, Wellington 6011
425	Fabric Property Limited	Bianca Tree / Amy Dresser (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz amy.dresser@minterellison.co.nz	c/- MinterEllisonRuddWatts PO Box 105249, Auckland 1143
426	Il Casino Apartment Body Corporate	Lynette Wilton	lynette.wilton@gmail.com cc. helen@tbl.co.nz	38 Jessie Street, Te Aro
427	Harish Ravji	N/A	harishravji@gmail.com	38 Jessie Street, Te Aro
428	Wingnut PM Ltd	Vince Visser	vince@wingnutfilms.co.nz	P.O. Box 15132, Miramar, Wellington 6023
429	Johnsonville Community Association	Darren Bottin	jcainc2@gmail.com	N/A
430	Kat Hall	N/A	newtownkat@gmail.com	10 Balmoral Terrace, Newtown
431	Peter Fordyce	N/A	peterfordyce98@gmail.com	2/2 Baden Road, Hataitai
432	Garvin Wong	N/A	gwong986@gmail.com	182 Tinakori Road, Thorndon
433	Miriam Moore	N/A	miriammoorenz@gmail.com	2A Coolidge Street, Brooklyn 6021
434	Anna Kemble Welch	N/A	akemblewelch@gmail.com	123 Daniell Street, Newtown
435	Paul M Blaschke	N/A	paul@blaschkerutherford.co.nz	34 Pearce Street, Vogeltown
436	Michelle Rush	N/A	rush.m@xtra.co.nz	32 Abbott Street, Ngaio 6035
437	Kirsty Woods	N/A	kirstyrgwoods@gmail.com	N/A
438	Ross Judge	N/A	ross.judge11@gmail.com	15 Chesterton Street, Johnsonville 6037
439	Survey & Spatial New Zealand Wellington Branch	N/A	nzisplanning.wgtn@gmail.com	Level 10, 57 Willis Street, Wellington
440	Newtown Residents' Association	Rhona Carson	newtownwellington@gmail.com	N/A Newtown
441	Reading Wellington Properties Limited	Steve Lucas	Steve.Lucas@readingrdi.com	100 Courtenay Place, Te Aro 6011
442	Kathryn Lethbridge	N/A	katy.lethbridge@xtra.co.nz	52 Hobson Street, Thorndon
443	Ingrid Downey	N/A	iicd@hotmail.com	25 Holloway Road, Aro Valley 6011
444	Meredith Robertshawe	N/A	meredith.robertshawe@wcc.govt.nz	67 Grafton Road, Roseneath 6011
445	Save Our Venues	The Live Music Venues and Music Community of Wellington	taylor@saveourvenues.co.nz	APRA AMCOS Aotearoa Unit 113 - 23 Edwin Street Mt Eden, Auckland
446	Chrissie Potter	N/A	chrissiepotter@gmail.com	4 Moir Street, Mount Victoria
447	Kay Larsen	N/A	datastreaminstantprint@gmail.com	8 Saint John Street, Aro Valley, Wellington 6011
448	Dale Mary McTavish	N/A	N/A	59 Owen Street, Newtown, Wellington 6021
449	Dorothy Thompson	N/A	dorothy.thompson@parliament.govt.nz	29 Moir Street, Mt Victoria, Wellington 6011
450	Peter Jack	N/A	pajack@kinect.co.nz (email not recognised)	79 Monorgan Road, Miramar, Wellington 6022
451	Graham Thomas Stewart	N/A	N/A	17 Coromandel Street, Newtown, Wellington
452	Guardians of the Bays	Yvonne Weeber	guardiansofthebays@gmail.com	143 Queens Drive, Lyall Bay, Wellington 6022
453	John Wilson	N/A	hugo@actrix.co.nz	142 Cortina Avenue, Johnsonville, Wellington 6037
454	David Lee	N/A	davidjohnlee@hotmail.com	74 Elizabeth Street, Wellington
455	(Vivien) Jane Kirkcaldie and Denis Maxwell Kirkcaldie	N/A	kirkcaldies@hotmail.com	6 Wesley Road, Kelburn, Wellington 6012
456	Chris Horne, Sunita Singh, Julia Stace, Paul Bell-Butler	N/A	jchorne15@gmail.com	28 Kaihuia Street, Northland
457	Marilyn Head	N/A	marilynhead@gmail.com	105 Owen Street, Newtown, Wellington 6021
458	Rachel Underwood	N/A	rachel.underwood@xtra.co.nz	14 Rimu Road, Kelburn, Wellington

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459	Greater Brooklyn Residents Association Inc's	Katie Underwood	kt@danzat.co.nz	N/A
460	Grant and Marilyn Griffiths, Griffiths Family Trust	N/A	grant.griffiths@xtra.co.nz	7 Harbour ParkTerrace, Khandallah, Wellington 6035
461	Anita Gude and Simon Terry	N/A	hooper@actrix.co.nz	N/A
462	Bruce Hay-Chapman	N/A	bruce.haychapman@gmail.com	5 Harper Street, Newtown 6021
463	Kiri Saul	N/A	kiri.saul@gmail.com	6 Harper Street, Newtown 6021
464	Rachel Leilani	N/A	rachel_leilani@hotmail.com	50 Victoria Street, Petone
465	Philip Cooke	N/A	p.m.b.cooke@gmail.com	20 Austin Street, Mount Victoria, Wellington 6011
466	Hannah Ouellet	N/A	heouellet@gmail.com	290 Rintoul Street, Berhampore
467	WingNut Films Productions Limited	Clare Olssen	clare.olssen@wingnutfilms.co.nz	PO Box 15 132, Miramar, Wellington 6022
468	Daniel Christopher Murray Grantham	N/A	dcmgrantham@gmail.com	43 Carluke Street, Paparangi, Wellington, 6037
469	Therese Reedy	N/A	therese.reedy93@gmail.com	290 Rintoul Street, Berhampore, Wellington
470	Stride Investment Management Limited	Bianca Tree / Amy Dresser (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz amy.dresser@minterellison.co.nz	PO Box 105249, Auckland 1143
471	Juliet Broadmore	N/A	juliet.broadmore@gmail.com	N/A
472	Alicia Hall on behalf of Parents for Climate Aotearoa	Alicia Hall	hello@parentsforclimatenz.org	401 Makara Road, Karori RD2 6972, Wellington
473	Olympus Apartments	Suzanne Trounson	suzanne.trounson@me.com	2/280 Oriental Parade, Oriental Bay, Wellington
474	Catherine Penetito	N/A	cathiepenetito@gmail.com	16 Arlington Street, Mount Cook, Wellington 6011
475	Smith Geursen	N/A	smith.geursen@gmail.com	N/A
476	Foodstuffs North Island	Evita Key Matt Norwell (Barker & Associates Ltd)	evitak@barker.co.nz mattnbarker.co.nz	PO Box 457, Wellington 6140
477	Owhiro Bay Residents Association	Sue Reid	owhirobayresidentsassoc@gmail.com	N/A
478	Christina Mackay	N/A	christina.mackay@vuw.ac.nz	148 Upland Road, Kelburn, Wellington 6012
479	Ben Barrett	N/A	benbarrett.nz@outlook.com	112 Owen Street, Newtown, Wellington
480	Elayna Chhiba	n/a	elayna53@gmail.com	11 Naughton Terrace, Kilbirnie, Wellington
481	Catharine Underwood	N/A	kt@dazant.co.nz	22 Taft Street, Brooklyn, Wellington
482	Living Streets Aotearoa	Ellen Blake	wellington@livingstreets.org.nz	N/A
483	Hilary Carr	N/A	hilarycarr@xtra.co.nz	N/A
484	Escape Investments Limited	Hamish Dahya	hamishd@globe.net.nz	PO Box 2000, Wellington 6140
485	House Movers Section of the New Zealand Heavy Haulage Association Inc	Stuart Ryan (NZHHA)	stuart@stuartryan.co.nz	Level 11, 59 High Street, Auckland
486	Zealandia Te Māra a Tāne	Kari Beaven	kari.beaven@visitzealandia.com	31 Waiapu Road, Karori, Wellington
487	The Thorndon Society Inc	Bruce Lynch	Bruce.Lynch@tec.govt.nz	22 Burnell Avenue, Thorndon, Wellington
488	Te Rūnanga o Toa Rangatira	Onur Oktem	onur.oktem@ngatitooa.iwi.nz	Te Rūnanga o Toa Rangatira, Level 2, 1 Cobham Court, Porirua 5022
489	David Wu	N/A	davidwuinnz@gmail.com	3 Tutchen Avenue, Mount Victoria, Wellington
490	Jonathan Markwick	N/A	jmar3120@gmail.com	Flat 4B 1 Hanson Street, Mount Cook, Wellington 6021

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Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
491	Helen Heffernan	N/A	helenmaryheffernan@gmail.com	4/23 Glenbervie Terrace, Thorndon, Wellington 6011
492	Craig Palmer	N/A	N/A	29 Moir Street, Mt Victoria, Wellington 6011
493	John McSoriley and Pierre David	N/A	john.mcsoriley@gmail.com	2/1 San Sebastian Road, Kelburn, Wellington 6012
494	Rita Angus Cottage Trust (formerly Thorndon Trust)	Helen Heffernan	ritaanguscottagetrust@gmail.com	PO Box 12421, Thorndon, Wellington 6144
495	Dinah Priestley	N/A	dinah.priestley@gmail.com	31B Patanga Crescent, Thorndon, Wellington
496	Te Whatu Ora - Health New Zealand	Steve Crombie	steve.crombie@ccdhb.org.nz	Private Bag 7902, Newtown, Wellington 6242
497	John Mulholland	N/A	jg_mulholland@hotmail.com	N/A

Further
submitters

FS1	AdamsonShaw Limited	Frank Sutton	franks@adamsonshaw.co.nz	PO Box 10 516, The Terrace, Wellington 6143
FS2	Laurence Harger & Ingrid Kölle	N/A	laurence.harger@web.de ikolle@xtra.co.nz	76 Falkirk Avenue, Seatoun, Wellington 6022
FS3	Ann Mallinson	N/A	mallinsonann@hotmail.com	4/248 Oriental Parade, Oriental Bay, Wellington
FS4	Glenside Progressive Association (GPA)	Barry Blackett	barry.blackett8@xtra.co.nz	N/A
FS5	Wellington Helicopters	Dai Daniel	dai.daniel@wellingtonhelicopters.net.nz	Shed 1, 19 Jervois Quay, Wellington
FS6	Onslow Historical Society	Judy Siers	siersjudy@gmail.com	86 Khandallah Rd, Khandallah, Wellington
FS7	Matthew Plummer	N/A	f	70 Wright Street, Mount Cook, Wellington
FS8	Jackie Pope	N/A	i.pope@xtra.co.nz	330 Oriental Parade, Oriental Bay, Wellington.
FS9	Heritage New Zealand Pouhere Taonga	Dean Raymond	draymond@heritage.org.nz	Heritage New Zealand Pouhere Taonga Takiwā o Te Pūtahi a Māui PO Box 2629 Wellington 6140
FS10	Denis Foot	N/A	denis@foot.co.nz	294 Oriental Parade, Wellington
FS11	Panorama Property Limited	Martin Shelton	Martin.Shelton@pennant.co.nz	26 Egremont Street, Belmont Auckland, 0622, New Zealand
FS12	Willis Bond and Company Limited	Jimmy Tait Jamieson	jimmy@willisbond.co.nz	Level 2, Free Ambulance Building, 5 Cable Street, Wellington
FS13	Oriental Bay Residents Association	Andrew Meehan	armeehan@xtra.co.nz	Level 8 Midland Chambers 45 Johnson St Wellington 6011
FS14	Fire and Emergency New Zealand	Fleur Rohleder (Beca)	fleur.rohleder@beca.com	85 Molesworth Street, Thorndon, PO Box 3942 Wellington
FS15	JCDECAUX New Zealand Trading Limited	Berry Simons	simon@berrysimons.co.nz Stephm@berrysimons.co.nz	Level 1, 1-13 Shortland Street, Auckland
FS16	Ian Attwood	N/A	ianattwood@gmail.com	18 Vera Street, Karori, Wellington 6012
FS17	Matthew James Underwood	N/A	Matthew@trillium.nz	41 Mornington Road, Brooklyn, Wellington
FS18	Ruapapa Limited	Andy Thomson	andythomson@ruapapa.com	PO Box 27461, Marion Squarey, Wellington 6141
FS19	Scott Galloway and Carolyn McLean	N/A	scott.galloway@hazelton.co.nz	N/A
FS20	Gael Webster	N/A	websterandbrown@xtra.co.nz	38 McFarlane St, Mt Victoria, Wellington.
FS21	Geoff Todd	N/A	seatoun.enterprises@gmail.com	P O Box 15135, Miramar 6243
FS22	David Edmonds	N/A	david.edmonds@outlook.co.nz	8 The Rigi, Northland, Wellington 6012

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Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
FS23	Foodstuffs North Island	Evita Key and Matt Norwell (Barker & Associates Ltd)	evitak@barker.co.nz	PO Box 457, Wellington 6140
FS24	Heidi Snelson	N/A	heidi.bluefish@gmail.com	70 Rowells Road, Glenside, Wellington
FS25	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	Chris Horne (Incite)	chris@incite.co.nz	Chorus New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand Limited C/- Incite P O Box 3082 Auckland 1140
FS26	Enterprise Miramar Peninsula Inc	Thomas Wutzler	thomas@helfen.co.nz	P.O. Box 15055 Miramar 6022
FS27	Wellington Electricity Lines Limited (WELL)	Tim Lester (Edison Consulting Group)	tim.lester@edison.co.nz	N/A
FS28	Horokiwi Quarries Limited	Pauline Whitney (Boffa Miskell)	pauline.whitney@boffamiskell.co.nz	N/A
FS29	Transpower New Zealand Limited	N/A	environment.policy@transpower.co.nz	PO Box 1021, Wellington
FS30	CentrePort Limited	William Woods	william.woods@centreport.co.nz	PO Box 794 Wellington 6140
FS31	Janine Hearn	N/a	janinehoff@gmail.com	9 Riroriro Close, Crofton Downs, Wellington 6035
FS32	Orienteering Wellington	Paul Teesdale-Spittle	t-s@xtra.co.nz	21 Perth Street, Ngaio, Wellington
FS33	Z Energy Limited	Jarrod Dixon (4Sight Consulting Limited)	jarrod.dixon@4sight.co.nz	4Sight Consulting Limited 201 Victoria Street West PO Box 911 310 Victoria St West Auckland 1142
FS34	Mediaworks Outdoor Limited	Steph Macdonald	Stephm@berrysimons.co.nz	Berry Simons, Level 1, 1-13 Shortland Street, Auckland
FS35	Jaqui Tutt	N/A	jaquitutt@gmail.com	25 Epuni Street, Aro Valley, Wellington 6021
FS36	Wellington International Airport Limited	Kirsty O'Sullivan (Mitchell Daysh Limited)	kirsty.osullivan@mitchelldaysh.co.nz	PO Box 489 Dunedin 9054
FS37	Pukepuke Pari Residents Incorporated	Victoria Stace	vctrstc18@gmail.com	16 Hay Street, Oriental Bay, Wellington
FS38	Gareth and Joanne Morgan	N/A	gareth@garethmorgan.com	35 Hay St, Oriental Bay PO Box 19-218, Wellington 6141 NEW ZEALAND
FS39	Mt Victoria Historical Society Inc	Joanna Newman	joneyman@xtra.co.nz	c/o 20 Porritt Avenue, Mount Victoria, Wellington 6011
FS40	Mary Varnham and Paul O'Regan	N/A	mary.varnham@awapress.co.nz	81A Awa Road, Seatoun, Wellington 6022
FS41	M&P Makara Family Trust	Ruth Paul	ruthpaul1@xtra.co.nz	403 Makara Road RD2 Karori, Wellington 6972
FS42	Karori Resident's Association	Andrea Skews	chair@karoriassociation.nz	PO Box 563, Wellington 6140
FS43	Andrea Skews	N/A	andrea.skews@gmail.com	C/- 27 BULLER STREET, TE ARO, WELLINGTON
FS44	Guardians of the Bays Inc	Yvonne Weeber	weeberry@gmail.com guardiansofthebays@gmail.com	143 Queens Drive, Lyall Bay, Wellington 6022
FS45	McDonald's Restaurants New Zealand Limited	Hannah Hoogeveen and Matt Norwell (Barker & Associates Ltd)	hannahh@barker.co.nz matttn@barker.co.nz	C/- Barker & Associates Ltd Attn: Hannah Hoogeveen / Matt Norwell PO Box 1986, Shortland Street Auckland 1140

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Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
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FS48	Parliamentary Service	N/A	david.wills@parliament.govt.nz Elizabeth.Neilson@simpsongrierson.com	Parliamentary Service, Private Bag 18041, Wellington 6160
FS49	Roseneath Residents' Association	Sean Rush	sean@seanrush.co.nz	60 The Crescent Roseneath
FS50	Matthew Wells, Adelina Reis and Sarah Rennie	N/A	matt-wells@outlook.com	10 Alexandra Road
FS51	Vital Healthcare Property Trust	Matt Norwell and Cassandra Rippon (Barker & Associates Ltd)	cassandrar@barker.co.nz mattn@barker.co.nz	PO Box 1986, Shortland Street, Auckland 1140
FS52	Ministry of Education	Aabhas Moudgil (Beca)	aabhas.moudgil@beca.com This	C/- Beca Ltd P O Box 3942 Wellington 6140
FS53	Jenny Gyles	N/A	jmar3120@gmail.com	A Hay Street, Oriental Bay, Wellington, 6011
FS54	Generation Zero	Annalies Veldmeijer	wellington@generationzero.org.nz	2 Forresters Lane, Te Aro, 6011
FS55	Grant Henderson	N/A	grant.henderson@bayleys.co.nz	92 Khandallah Road
FS56	Hadleigh Petherick	N/A	hadleigh.petherick@gmail.com	37 Barnard Street, Wadestown, Wellington
FS57	Phil Kelliher	N/A	pckelliher@gmail.com	13 Porritt Ave, Mt Victoria
FS58	Spencer Wade Petherick	N/A	spencer.petherick@bayleys.co.nz	1-187 Vivian Street, Te Aro, Wellington 6011
FS59	Fale Malae Trust	Hadleigh Pedler / Paula Brosnahan (Chapman Tripp)	hadleigh.pedler@chapmantripp.com	Chapman Tripp, PO Box 993, Wellington 6140
FS60	Richard Hovey	N/A	richhoveynz@gmail.com	32 Clarence St, Brooklyn, Wellington
FS61	Powerco Limited	Gary Scholfield	planning@powerco.co.nz	Powerco Limited PO Box 13 075 Tauranga 3141 Attention: Gary Scholfield
FS62	Helen Foot	N/A	helen@foot.co.nz	2 Hay Street, Oriental Bay, Wellington
FS63	Newtown Residents' Association	Rhona Carson	newtownwellington@gmail.com	1 Owen St Newtown Wellington 6021
FS64	Jo McKenzie	N/A	jomckenzie07@gmail.com	32 Spencer St, Crofton Downs, 6035
FS65	Emily Nash	N/A	nashemily35@gmail.com	1/20 Doris Gordon Crescent, Crofton Downs
FS66	Mākara-Ōhāriu Community Board	Mark Reed	mark.reed@wcc.govt.nz	510 Makara Road, RD2, Wellington 6972
FS67	Carol Anderson	N/A	cazanderson.ca@gmail.com	66 Chelmsford Street, Ngaio, Wellington 6035
FS68	Claire Nolan, James Fraser, Margaret Franken, Biddy Bunzel, Michelle Wooland, Lee Muir	N/A	Cla.nols@outlook.com margaret Franken@gmail.com fraser.avantgardener@gmail.com	N/A
FS69	Thorndon Residents' Association Inc	N/A	contact@thorndon.org.nz	PO Box 12282, Wellington 6144
FS70	Toka Tū Ake EQC	Jo Horrocks	resilience@eqc.govt.nz	N/A
FS71	Richard Murcott	N/A	richard.murcott@gmail.com	64 Hobson Street, Thorndon
FS72	KiwiRail Holdings Limited	Sheena McGuire	sheena.mcguire@kiwirail.co.nz	Wellington Railway Station, Bunny Street, Pipitea, Wellington 6011
FS73	Design Network Architecture Limited	N/A	planning@designnetwork.co.nz	PO Box 30614, Lower Hutt 5040
FS74	Hilary Watson	N/A	hilarywatson108@gmail.com	5 Corunna Ave Newtown

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Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
FS75	Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland	Rod Halliday	rod.halliday@hrmlimited.co.nz	107B Westchester Drive, Churton Park 6037
FS76	Sophie Kahn	N/A	soph88kiwi@gmail.com	53 Trelissick Cres, Ngaio, Wellington
FS77	Simon Nightingale	Steph Macdonald (Berry Simons)	Stephm@berrysimons.co.nz	Simon Nightingale C/- Berry Simons, Level 1, 1-13 Shortland Street, Auckland
FS78	Graeme Doherty	N/A	graemekdoherty@gmail.com	8 Huntleigh Park Way, Ngaio
FS79	Buy Back the Bay	N/A	shellybaywatch@gmail.com	69 Ludlam Street, Seatoun, Wellington 6022
FS80	Onslow Residents Community Association	Lawrence Collingbourne	onslowcommunityassn@gmail.com	54 Waru Street, Khandallah, Wellington
FS81	Lance Lones	N/A	contact@l2vr.com	96 Seatoun Heights Road, Seatoun Heights, 6022
FS82	Wellington's Character Charitable Trust	Felicity Wong	felicity_wong@icloud.com	21 Hay Street, Oriental Bay
FS83	Wellington Civic Trust	N/A	secretary@wellingtoncivictrust.org	PO Box 10183, Wellington
FS84	Greater Wellington Regional Council	Mika Zollner	mika.zollner@gw.govt.nz	100 Cuba Street, Te Aro, Te Whanganui-a-Tara 6011
FS85	Royal Forest and Bird Protection Society of New Zealand Inc	Amelia Geary	a.geary@forestandbird.org.nz	Ground Floor . 205 Victoria St . PO Box 631 . Wellington . New Zealand
FS86	Andy Foster	N/A	andy.foster@outlook.co.nz	27 Versailles Street, Karori
FS87	Metlifecare Limited	Bianca Tree (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz	c/- MinterEllisonRuddWatts PO Box 105249 Auckland 1143 Attention: Bianca Tree
FS88	Polish Association in New Zealand Incorporated	Peter Skrzynski	association@polishcommunity.org.nz	PO Box 853, Wellington 6140
FS89	Kāinga Ora – Homes and Communities	N/A	developmentplanning@kaingaora.govt.nz	PO Box 74598, Greenlane, Auckland
FS90	Rebecca Morder	N/A	becmorder@gmail.com	10 Clark Street, Khandallah
FS91	Sarah Cutten and Matthew Keir	N/A	sarah.cutten@gmail.com	28 Robieson Street, Roseneath Wellington, 6011
FS92	Rongotai Investments Ltd	Cameron de Leijer (SpencerHolmes Limited)	cpd@spencerholmes.co.nz	PO Box 588, Wellington 6140
FS93	Prime Property Group	Cameron de Leijer (SpencerHolmes Limited)	cpd@spencerholmes.co.nz	PO Box 588, Wellington 6141
FS94	Don MacKay	N/A	djmackay88@gmail.com	5 Wilkinson Street, Oriental Bay
FS95	Bus Barn Ltd	Cameron de Leijer (SpencerHolmes Limited)	cpd@spencerholmes.co.nz	PO BOX 588, Wellington 6140
FS96	LIVE WELLington	Jane O'Loughlin	admin@livewellington.org	12 Albany Avenue, Mount Victoria, Wellington
FS97	Firstgas Ltd	Natalie Webb (Beca)	Natalie.Webb@beca.com	9 Courtenay Street, PO Box 264 New Plymouth, 4340 New Zealand
FS98	Jane O'Loughlin	N/A	jane.oloughlin@gmail.com	12 Albany Avenue, Mount Victoria, Wellington
FS99	Cycling Action Network	Patrick Morgan	patrick@can.org.nz	2 Forrester's Lane , Te Aro
FS100	Stephen Minto	N/A	stephennpm@gmail.com	123 Austin Street, Mount Victoria, Wellington
FS101	Meridian Energy Limited	Andrew Guerin	andrew.guerin@meridianenergy.co.nz	P O BOX 2146, Christchurch 8140
FS102	Tracey Henderson	N/A	tchendo@mac.com	10 Riroriro Close, Crofton Downs, Wellington 6035
FS103	Waka Kotahi NZ Transport Agency	Mike Scott	mike.scott@nzta.govt.nz Environmentalplanning@nzta.govt.nz	Level 7, Majestic Centre 100 Willis Street Wellington 6145

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				PO BOX 5084 Wellington 6140
FS104	New Zealand Defence Force	Rebecca Davies (Tonkin + Taylor)	rebecca.davies@nzdf.mil.nz rpurdy@tonkintaylor.co.nz	C/- Tonkin + Taylor PO Box 13055, Christchurch
FS105	Airways Corporation of New Zealand Limited	Michael Connolly	michael.connolly@airways.co.nz	Airways, 50 Tacy Street, Kilbirnie, Wellington 6022
FS106	Director-General of Conservation	Ashiley Sycamore	asycamore@doc.govt.nz	RMA Shared Services, Department of Conservation, Private Bag 3010, Hamilton 3240
FS107	Stride Investment Management Limited	Bianca Tree / Amy Dresser (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz amy.dresser@minterellison.co.nz	Stride Investment Management Limited c/- MinterEllisonRuddWatts PO Box 105249 AUCKLAND 1143 Attention: Bianca Tree / Amy Dresser
FS108	Investore Property Limited	Bianca Tree / Amy Dresser (MinterEllisonRuddWatts)	bianca.tree@minterellison.co.nz amy.dresser@minterellison.co.nz	Investore Property Limited c/- MinterEllisonRuddWatts PO Box 105249 AUCKLAND 1143 Attention: Bianca Tree / Amy Dresser
FS109	Friends of the Wellington Town Belt	John Bishop	Bishop.lamb@pistingaround.com	P O Box 28 056 Wellington 6012
FS110	Steve West	N/A	deb.steve@outlook.com	9 Captain Edward Daniell Drive, Ngaio, Wellington
FS111	Historic Places Wellington Inc	Felicity Wong	wgt@historicplacesaotearoa.org.nz	N/A
FS112	Wellington City Council Environmental Reference Group	Shannon Wallace and Michelle Rush. Leteicha Lowry	Wallace.shannon.r@gmail.com rush.m@xtra.co.nz Leteicha.Lowry@wcc.govt.nz	N/A
FS113	David Allison	N/A	dallison.cdw@gmail.com	12 Spencer Street, Crofton Downs, Wellington 6035
FS114	Johnsonville Community Association Inc	Darren Bottin	jcainc2@gmail.com	76 Chesterton Drive, Johnsonville, Wellington
FS115	Serah Allison		district.plan@wcc.govt.nz	
FS116	Survey & Spatial New Zealand Wellington Branch	D Gibson	nzisplanning.wgt@gmail.com	Level 10, 57 Willis Street, Wellington 6011
FS117	Roland Sapsford	N/A	roland@actrix.gen.nz	23 Epuni Street, Aro Valley, Wellington
FS118	Sarah Crawford	N/A	saraha.crawford@xtra.co.nz	42 Walter Road, Lower Hutt, 5013
FS119	Kirsty Wood	N/A	kmtwood@icloud.com	34 McFarlane St, Mt Victoria, Wellington
FS120	Christopher Kennedy	N/A	chris@kennedy.kiwi.nz	20 Captain Edward Daniel Drive, Ngaio, 6035
FS121	Susan Pierce	N/A	latitude40@hotmail.com	20 Captain Edward Daniel Drive, Ngaio, 6035
FS122	Strathmore Park Residents Association Incorporated	Glenn Kingston	gkingston@xtra.co.nz	53 Tannadyce Street, Strathmore Park Wellington 6022
FS123	Lower Kelburn Neighbourhood Group	Rosalind McIntosh	RosalindM108@gmail.com	11 Wesley Rd, Kelburn, Wellington, 6012
FS124	Lumo Digital Outdoor Limited	Anthony Blomfield (Bentley&Co)	ablomfield@bentley.co.nz	PO Box 2199, Wellington 6140
FS125	Out Of Home Media Association of Aotearoa (OOHMAA)	Anthony Blomfield (Bentley&Co)	ablomfield@bentley.co.nz	PO Box 2199, Wellington 6140

List of Submitters and Contact Details - Numerical Order

Submitter Number	Submitter Name/ Organisation/Company/Trust	Contact Person (if different)	Email address	Postal address
FS126	The Retirement Villages Association of New Zealand Incorporated	Luke Hinchey, Marika Williams	luke.hinchey@chapmantripp.com marika.williams@chapmantripp.com	c/o Chapman Tripp, Level 34, 15 Customs Street West, PO Box 2206, Auckland 1024
FS127	Southern Cross Healthcare Limited	Bianca Tree / Amy Dresser	bianca.tree@minterellison.co.nz / amy.dresser@minterellison.co.nz	Southern Cross Healthcare Limited c/- MinterEllisonRuddWatts PO Box 105 249 AUCKLAND 1143 Attention: Bianca Tree / Amy Dresser
FS128	Ryman Healthcare Limited	Luke Hinchey	luke.hinchey@chapmantripp.com / marika.williams@chapmantripp.com / hannah.okane@mitchelldaysh.com	c/o Chapman Tripp, Level 34, 15 Customs Street West, PO Box 2206, Auckland 1024
FS129	Paul Blaschke	N/A	paul@blaschkerutherford.co.nz	34 Pearce St Vogeltown Wellington 6021
FS130	Living Streets Aotearoa	Ellen Blake	wellington@livingstreets.org.nz	N/A
FS131	Elayna Chhiba	N/A	elayna53@gmail.com	11 Naughton Terrace, Kilbirnie
FS132	Rachel Leilani	N/A	rachel_leilani@hotmail.com	50 Victoria Street Petone
FS133	Stratum Management Ltd	Craig Stewart	mitch@bbplanning.co.nz	C/- Building Block Planning Ltd, 8A Travancore Street, Island Bay, Wellington
FS134	Aro Valley Community Council	Jaqui Tutt	jaquitutt@gmail.com	25 Epuni Street, Aro Valley, Wellington 6021
FS135	Alan Fairless	N/A	fairlessaj@gmail.com	25 Epuni Street, Aro Valley, Wellington 6021
FS136	Escape Investments Limited	Leo Archer	hd@globe.net.nz	PO Box 2000, Wellington 6140
FS137	Rod Bray	N/A	rod@northbridgeproperties.co.nz	34 Park Road, Glenfield, Auckland
FS138	Te Rūnanga o Toa Rangatira	Onur Oktem Lewis	onur.oktem@ngatitoa.iwi.nz	Te Rūnanga o Toa Rangatira Level 2, 1 Cobham Court, Porirua 5022
FS139	Board of Airline Representatives of New Zealand Inc	G K Chappell	gillian@chappell.nz	Gill Chappell Barrister C/- BARNZ P O Box 2779 Auckland 1140