

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Meridian Energy Limited	228.27	Oppose in part	<p>Considers that the Introduction to the INF-ECO chapter should include, 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.</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.</p> <p>Considers the note in the preamble is not entirely helpful in clarifying this.</p> <p>Meridian accepts that the objectives and policies of the ECO Ecosystems and Indigenous Biodiversity chapter are applicable to renewable electricity generation activities. However, considers 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.</p>	Retain the Introduction to Chapter INF-ECO with amendment.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Meridian Energy Limited	228.28	Amend	<p>Considers that the Introduction to the INF-ECO chapter should include, 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.</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.</p> <p>Considers the note in the preamble is not entirely helpful in clarifying this.</p> <p>Meridian accepts that the objectives and policies of the ECO Ecosystems and Indigenous Biodiversity chapter are applicable to renewable electricity generation activities. However, considers 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.</p>	<p>Amend the Introduction to Chapter INF-ECO, by inserting 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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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Transpower New Zealand Limited	315.104	Amend	<p>Considers Transpower’s operational activities involve upgrading and ‘recutting’ access tracks, vegetation trimming and vegetation removal. Transpower’s maintenance and climate change adaptation activities will involve making foundations stronger/bigger, and relocating assets (among other things). Transpower is required to clear paths and undertake vegetation trimming/clearance to:</p> <ul style="list-style-type: none"> • Ensure clearance under and adjacent to the lines; • Provide access to the lines and support structure assets, including for fault response purposes; • Enable maintenance of support structures including painting, foundation strengthening and replacement; and • Reconductor lines. <p>Transpower has a cyclical maintenance programme, but typically inspections can occur any time between 6 and 18 months. The decision to trim or clear vegetation on inspection depends on factors such as the age of the support structure, nature of the vegetation, landowner relationships, and the operational requirements of the asset. The requirement to provide sufficient clearance under the lines is a regulatory requirement of the Electricity (Hazards from Trees) Regulations 2003. Clearance is required for safety reasons (primarily to prevent flashovers). While trimming/ clearance is a safety requirement, it is subject to local authority plan provisions (such as when the site is an SNA which is a ‘Natural Area’ for the purpose of the National Environmental Standards for Electricity Transmission Activities (NESETA)). Considers that it is important that it is recognised in the PDP that some of these activities will have unavoidable impacts and will sometimes be in SNAs given the extent and location of Transpower’s assets. These activities are critical to the functioning of the National Grid, and should be provided for.</p>	Seeks to amend the Infrastructure - Ecosystems and Indigenous Biodiversity (INF-ECO) chapter provisions to recognise and provide for the National Grid as set out in subsequent submission points.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Transpower New Zealand Limited	315.105	Amend	Supports the introductory text but seeks clarification that the National Grid is subject to specific policies and rules and the general sub-chapter provisions do not apply.	<p>Amend the introduction to the Infrastructure - Ecosystems and Indigenous Biodiversity (INF-ECO) as follows:</p> <p>This sub-chapter applies to infrastructure within Natural Features and Landscape Overlays. It applies in addition to the principal Infrastructure Chapter.</p> <p><u>Included within the sub-chapter are provisions specific to the National Grid (NG) and Gas Transmission Pipelines Corridor (GTPC). For the avoidance of doubt, other sub-chapter policies and rules within this sub-chapter do not apply to the National Grid.</u></p> <p>Note: The objectives of the Infrastructure Chapter apply.</p>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Transpower New Zealand Limited	315.106	Oppose in part	Considers that on the basis INF-ECO-R44 is to be amended [as requested in other submission point regarding this rule] so it does not apply to the National Grid, considers Standard S19 will not be applicable to the National Grid. If the intent is for S19 to apply to the National Grid Transpower opposes its application as the submitter considers the NESETA manages vegetation works for existing National Grid infrastructure and the provision of a standard to apply to the National Grid adds unnecessary confusion and interpretation issues.	Opposes reference to INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) in any National Grid specific rules.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Transpower New Zealand Limited	315.107	Amend	Considers that on the basis INF-ECO-R44 is to be amended [as requested in other submission point regarding this rule] so it does not apply to the National Grid, considers Standard S19 will not be applicable to the National Grid. If the intent is for S19 to apply to the National Grid, Transpower opposes its application as the submitter considers the NESETA manages vegetation works for existing National Grid infrastructure and the provision of a standard to apply to the National Grid adds unnecessary confusion and interpretation issues.	Seeks to delete reference to INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) from any National Grid specific rules.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Transpower New Zealand Limited	315.108	Oppose in part	Considers that on the basis INF-ECO-R44 is to be amended so it does not apply to the National Grid, INF-ECO-S20 will not be applicable to the National Grid. If the intent is for INF-ECO S20 to apply to the National Grid Transpower opposes its application as it duplicates the NESETA and adds unnecessary confusion and interpretation issues.	Opposes reference to INF-ECO-S20 (Earthworks within a significant natural area) in any National Grid specific rules.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Transpower New Zealand Limited	315.109	Amend	Considers that on the basis INF-ECO-R44 is to be amended so it does not apply to the National Grid, Standard S20 will not be applicable to the National Grid. If the intent is for S20 to apply to the National Grid Transpower opposes its application as it duplicates the NESETA and adds unnecessary confusion and interpretation issues.	Seeks to delete reference to INF-ECO-S20 (Earthworks within a significant natural area) from any National Grid specific rules.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Royal Forest and Bird Protection Society	345.57	Support in part	Notes that the introduction to this sub-chapter states that the objectives of the Infrastructure chapter apply. Further, that this sub-chapter applies in addition to the Infrastructure chapter. That means that both the policies in the Infrastructure chapter as well as those in this sub-chapter will apply to use and development in SNAs. Forest & Bird's overarching submission for this chapter is that the provisions should be no less protective than those in the ECO chapter. The provisions in this chapter should mirror the ECO provisions, with the amendments made as sought by F&B in respect of that chapter.	Amend chapter to mirror ECO - Ecosystems and Indigenous Biodiversity chapter to apply a similar level of protection.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	WCC Environmental Reference Group	377.39	Support	Supportive of the entire sub-chapter as it is logical and strikes a good balance between use and protection.	Retain the Infrastructure (Ecosystems and Biodiversity) chapter as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / General INF-ECO	Taranaki Whānui ki te Upoko o te Ika	389.57	Amend	[No specific reason given beyond decision requested - refer to original submission].	Amend 'Other relevant District Plan provisions' to include Sites and Areas of Significance to Māori chapter.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Transpower New Zealand Limited	315.110	Amend	<p>Considers that Transpower has existing assets within identified SNAs [see full submission for image supplied].</p> <p>Transpower is required to undertake vegetation trimming/clearance necessary for the safe and efficient operation, maintenance, upgrading and development of the National Grid, including (but not limited to) trimming that may be required by the Electricity (Hazards from Trees) Regulations 2003. Related, is the operational requirement for clearance of vegetation on access tracks to enable Transpower to access the grid infrastructure to undertake its operation, maintenance and upgrade. Submitter considers the policy does not give effect to the NPS-ET. Considers the policy directive within INF-ECO-P35 that works "do not adversely affect the biodiversity values" does not give effect to the NPS-ET. Considers the policy is drafted such that all and any adverse effects are to be avoided. Considers that such a requirement is onerous given the policy relates to existing infrastructure which will often have safety requirements and obligations in respect of adjacent vegetation. Transpower seeks amendment to the policy to reflect the realities of maintaining the National Grid and ensuring safe and necessary vegetation clearance distances.</p> <p>(Option B) [Refer to original submission for full reason]</p>	<p>Add a new National Grid specific policy as follows:</p> <p><u>INF-NG-P2 Operation, and maintenance and minor upgrade of the National Grid</u></p> <p><u>Provide for the operation, maintenance and minor upgrade of the National Grid while managing the adverse effects of these activities.</u></p>

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Transpower New Zealand Limited	315.111	Amend	<p>The submitter does not oppose the identification of SNAs, but considers the policy approach has to be cognisant of the need to develop the National Grid and also give effect to the NPS-ET. Transpower proposes an amended policy approach specific to the National Grid [in general]. Considers that key to the approach is the recognition of the need to provide and enable the National Grid, whilst also providing a robust framework to manage effects. Specific to INF-ECO-P37, while Transpower accepts the policy does have regard to the route, site and method selection process, and operational needs, considers they apply in context of the policy chapeau to ‘give priority to avoiding adverse effects’. Submitter queries how the term “give priority to avoiding adverse effects” would be implemented. Queries if this requires avoidance as the default position. Transpower’s preference is for development within SNA’s to be addressed in the specific National Grid development policy (within the INF chapter). Considers this would enable any new National Grid development to be considered in a comprehensive manner.</p>	<p>Add new National Grid specific policy to replace INF-ECO-P37 (New development of National Grid within significant natural areas) as follows:</p> <p><u>INF-NG-P6 Development of the National Grid</u> <u>Provide for the development of the National Grid</u></p> <p><u>1. In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the Commercial and Mixed-Use zones, and areas of high recreational or amenity value and existing sensitive activities.</u></p> <p><u>2. Seek to avoid the adverse effects of the National Grid within areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED8 - Significant Natural Areas, and SCHED11 – Special Amenity Landscapes, outside the coastal environment.</u></p> <p><u>3. Where the National Grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</u></p> <p><u>a. Seeking to avoid adverse effects on areas identified in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes, and the Coastal Margin.</u></p> <p><u>b. Where it is not practicable to avoid adverse effects on the values of the areas in SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin because of the functional needs or operational needs of the National Grid, remedy or mitigate adverse effects on those values.</u></p> <p><u>c. Seeking to avoid significant adverse effects on:</u></p> <p><u>i. other areas of natural character</u></p> <p><u>ii. natural attributes and character of other natural features and natural landscapes</u></p> <p><u>iii. indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010</u></p> <p><u>d. Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</u></p> <p><u>e. Recognising there may be some areas within SCHED10 – Outstanding Natural Features and Landscapes, SCHED12 - High Coastal Natural Character Areas, SCHED8 - Significant Natural Areas, SCHED11 – Special Amenity Landscapes; and the Coastal Margin, where avoidance of adverse effects is required to protect the identified values and characteristics.</u></p> <p><u>4. Remedy or mitigate any adverse effects from the operation, maintenance, upgrade, major upgrade or development of the National Grid which cannot be avoided, to the extent practicable; and</u></p> <p><u>5. When considering the adverse effects in respect of 1-3 above:</u></p> <p><u>a. Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and</u></p> <p><u>b. Consider the constraints arising from the operational needs or functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.</u></p>

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Royal Forest and Bird Protection Society	345.58	Amend	Considers Policy 11 of NZCPS is not given effect to by the current policies. Seeks new policy to do so.	Add new policy INF-ECO-PX (All infrastructure activities in the coastal environment): <u>Only allow activities within a significant natural area in the coastal environment where it can be demonstrated that they:</u> <u>1. Avoid adverse effects on the matters in Policy 11(a) of the New Zealand Coastal Policy Statement 2010;</u> <u>2. 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</u> <u>3. Protect other indigenous biodiversity values in accordance with ECO-P1</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Wellington International Airport Ltd	406.143	Amend	Considers that that a new policy and method is required to allow for the removal of vegetation within significant natural areas where necessary to provide for the safe and/or efficient operation of regionally significant infrastructure. [See paragraphs 4.50 to 4.55 in original submission for full reason]	Add new policy as follows: <u>INF-ECO-P38 Appropriate vegetation removal in significant natural areas</u> <u>Enable vegetation removal within significant natural areas identified within SCHED8 where:</u> <u>1. The vegetation removal is required to provide for the ongoing and safe operation of regionally significant infrastructure; and</u> <u>2. Any adverse effects on indigenous biodiversity values within a significant natural area are considered in accordance with ECO-P1.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / New INF-ECO	Wellington International Airport Ltd	406.144	Amend	Considers that that a new policy and method is required to allow for the removal of vegetation within significant natural areas where necessary to provide for the safe and/or efficient operation of regionally significant infrastructure. [See paragraphs 4.50 to 4.55 in original submission for full reason]	Add new rule as follows: <u>INFR-ECO-R43A</u> <u>All Zones</u> <u>Removal of vegetation within significant natural areas to protect regionally significant infrastructure</u> <u>1. Activity Status: Restricted discretionary</u> <u>Matters of discretion are:</u> <u>3. The matters in INF-ECO-P38</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Royal Forest and Bird Protection Society	345.59	Support	Supports the policy.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Waka Kotahi	370.114	Support	Support this policy as under the maintenance and repair definition it 'means any work or activity necessary to continue the operation or functioning of existing infrastructure.' Waka Kotahi consider this sufficient to cover off health and safety risks such as vegetation control to preserve sight lines.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Waka Kotahi	370.115	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Director-General of Conservation	385.29	Support	Supports proposed policy INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area).	Retain policy INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Wellington International Airport Ltd	406.145	Oppose in part	Opposes INF-ECO-P33 [See paragraphs 4.49 to 4.54 of original submission for full reason]	Opposes INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) in part and seeks amendment.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Wellington International Airport Ltd	406.146	Amend	Opposes INF-ECO-P33 [See paragraphs 4.49 to 4.54 of original submission for full reason]	Amend INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as follows: Provide for the operation, maintenance and repair of existing infrastructure within significant natural areas where the activity, including associated earthworks, not adversely affect the biodiversity values- it can be demonstrated that: <u>1. There is an operational need or functional need that means the infrastructure's location cannot be practicably avoided; and</u> <u>2. Any adverse effects on indigenous biodiversity values within a significant natural area are applied in accordance with ECO-P1.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	Wellington International Airport Ltd	406.147	Amend	Opposes INF-ECO-P33 [See paragraphs 4.49 to 4.54 of original submission for full reason]	Delete INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) in its entirety.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P33	KiwiRail Holdings Limited	408.65	Support	Supports policy which provides for the operation, maintenance and repair of infrastructure within SNAs. KiwiRail note there are mapped Significant Natural Areas that include KiwiRail land. The SNAs as proposed, recognise established rail infrastructure and do not include existing structures or railway tracks but do cover KiwiRail land adjacent to infrastructure on the Johnsonville Line and at Hawkins Hill. KiwiRail therefore have an interest in these provisions.	Retain INF-ECO-P33 (Operation, maintenance and repair of existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.50	Oppose in part	INF-ECO-P34 incorrectly cross-refers to the effects management hierarchy in Policy ECO-P2. This needs to be amended to ECO-P1 where the hierarchy sits.	Amend Policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) so the cross-reference to the effects management hierarchy is ECO-P1.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Powerco Limited	127.32	Oppose in part	Considers that this policy incorrectly cross-refers to the effects management hierarchy in Policy ECO-P2 (Appropriate vegetation removal in significant natural areas). This needs to be amended to ECO-P1 where the hierarchy sits.	Amend Policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as follows: Allow for upgrades to existing infrastructure and for new infrastructure within significant natural areas where it can be demonstrated that: <u>1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and</u> <u>2. Any adverse effects on indigenous biodiversity values within a significant natural area are applied in accordance with ECO-P1, ECO-P2.</u>

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Royal Forest and Bird Protection Society	345.60	Oppose in part	Supports the requirement that ECO P1 is met, although this should be expressed more clearly. We have made submissions about ECO-P1, and seek that those amendments are also given effect to via this policy. Opposes the inclusion of paragraph 1 in this policy, as it adds another standard that arguably will lessen the protections required to be given by ECO-P1. If it is to remain, we oppose the reference to operational need, as that encompasses a very broad range of considerations. We have sought that ECO P1 reference ECO P5. If that does not occur, ECO P5 will also need to be referenced in this policy. Notes that the reference to ECO-P2 in this policy should be ECO-P1.	Amend INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas): Consider allowing <u>Allow</u> for upgrades to existing infrastructure and for new infrastructure within significant natural areas <u>only</u> where it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and 2. Any adverse effects on indigenous biodiversity values within a significant natural area are managed applied in accordance with <u>ECO-P21 and ECO P5.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Waka Kotahi	370.116	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Director-General of Conservation	385.30	Support	Supports proposed policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas).	Retain policy INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Wellington International Airport Ltd	406.148	Oppose	Opposes INF-ECO-P34 [See paragraphs 4.50 to 4.55 of original submission for full reason]	Opposes INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas as follows) and seeks amendment.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Wellington International Airport Ltd	406.149	Amend	Opposes INF-ECO-P34 [See paragraphs 4.50 to 4.55 of original submission for full reason]	Delete INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas as follows) in its entirety.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	Wellington International Airport Ltd	406.150	Amend	Opposes INF-ECO-P34 [See paragraphs 4.50 to 4.55 of original submission for full reason]	Amend INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas as follows): Allow for upgrades to existing infrastructure and for new infrastructure within significant natural areas where it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be <u>practically</u> avoided; and 2. Any adverse effects on indigenous biodiversity values within a significant natural area are applied in accordance with ECO-P2 <u>ECO-P1.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P34	KiwiRail Holdings Limited	408.66	Support	Supports policy to allow for upgrades to and new infrastructure in SNAs.	Retain INF-ECO-P34 (Upgrades to and new infrastructure in significant natural areas) as notified.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Transpower New Zealand Limited	315.112	Amend	<p>Considers that Transpower has existing assets within identified SNAs [see full submission for image supplied].</p> <p>Transpower is required to undertake vegetation trimming/clearance necessary for the safe and efficient operation, maintenance, upgrading and development of the National Grid, including (but not limited to) trimming that may be required by the Electricity (Hazards from Trees) Regulations 2003. Related, is the operational requirement for clearance of vegetation on access tracks to enable Transpower to access the grid infrastructure to undertake its operation, maintenance and upgrade. Submitter considers the policy does not give effect to the NPS-ET. Considers the policy directive within INF-ECO-P35 that works “do not adversely affect the biodiversity values” does not give effect to the NPS-ET. Considers the policy is drafted such that all and any adverse effects are to be avoided. Considers that such a requirement is onerous given the policy relates to existing infrastructure which will often have safety requirements and obligations in respect of adjacent vegetation. Transpower seeks amendment to the policy to reflect the realities of maintaining the National Grid and ensuring safe and necessary vegetation clearance distances.</p> <p>(Option A) [Refer to original submission for full reason]</p>	<p>Amend policy INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area) as follows:</p> <p>Provide for the operation, maintenance, and repair <u>and minor upgrade of</u> existing transmission lines within significant natural areas where the activity, including associated earthworks, does not adversely affect the biodiversity values. <u>while managing the adverse effects of these activities.</u></p>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Royal Forest and Bird Protection Society	345.61	Support	Supports the policy.	Retain INF-ECO-P35 (Operation, maintenance, and repair of existing National Grid Infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Waka Kotahi	370.117	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P35	Director-General of Conservation	385.31	Support	Supports proposed policy INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area).	Retain policy INF-ECO-P35 (Operation, maintenance and repair of existing National Grid infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Transpower New Zealand Limited	315.113	Oppose	<p>Considers that Transpower has existing assets within identified SNA’s and is required to provide a reliable and efficient transmission network. The SNA’s across the city are extensive and cover both the open space and rural environments. The intent of the NPS-ET and NESETA is to provide a comprehensive regime for the National Grid recognising its national significance. Of relevance to the upgrading of the National Grid are policies 1-6. Considers that, as currently drafted, Transpower has concerns INF-ECO-P36 does not give effect to the NPS-ET. The cross references to the ECO hierarchy policy 2 (noting this cross reference appears an error and it should be ECO-P1) does not give effect to the NPS-ET. While Transpower is not outright opposed to the cross reference to the ECO policies, it has reservations that a direct cross reference to general policies will not reflect the nuanced approach that is required in order to give effect to the NPS-ET. Furthermore the cross reference to the effects management hierarchy is not appropriate for all maintenance activities given the necessity of the works. Transpower has proposed an amended policy approach to give effect to the NPS-ET.</p> <p>[Refer to original submission for full reason]</p>	Opposes policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas) and seeks amendment.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Transpower New Zealand Limited	315.114	Amend	<p>Considers that Transpower has existing assets within identified SNA's and is required to provide a reliable and efficient transmission network. The SNA's across the city are extensive and cover both the open space and rural environments. The intent of the NPS-ET and NESETA is to provide a comprehensive regime for the National Grid recognising its national significance. Of relevance to the upgrading of the National Grid are policies 1-6. Considers that, as currently drafted, Transpower has concerns INF-ECO-P36 does not give effect to the NPS-ET. The cross references to the ECO hierarchy policy 2 (noting this cross reference appears an error and it should be ECO-P1) does not give effect to the NPS-ET. While Transpower is not outright opposed to the cross reference to the ECO policies, it has reservations that a direct cross reference to general policies will not reflect the nuanced approach that is required in order to give effect to the NPS-ET. Furthermore the cross reference to the effects management hierarchy is not appropriate for all maintenance activities given the necessity of the works. Transpower has proposed an amended policy approach to give effect to the NPS-ET.</p> <p>[Refer to original submission for full reason]</p>	<p>Amend policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas) as follows:</p> <p>INF-ECO-P36 Upgrading the National Grid within significant natural areas</p> <p>Provide for upgrading of the National Grid within significant natural areas by applying the effects management hierarchy in ECO-P2.</p> <p><u>In providing for the upgrading of existing National Grid (NG)) infrastructure within significant natural areas:</u></p> <ol style="list-style-type: none"> <u>1. Seek to avoid adverse effects on biodiversity values</u> <u>2. When considering major upgrades, have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection;</u> <u>3. Recognise the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects; and</u> <u>4. Recognise the potential benefits of upgrades to the National Grid to people and communities;</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Royal Forest and Bird Protection Society	345.62	Support	Notes incorrect reference to ECO-P2, considers ECO-P5 should also be referenced.	<p>Amend INF-ECO-P36 (Upgrading the National Grid within significant natural areas):</p> <p><u>Consider providing Provide for upgrading of the National Grid within significant natural areas <u>only where it can be demonstrated that any adverse effects on indigenous biodiversity are managed in accordance with</u> by applying the effects management hierarchy in ECO-P2<u>1 and ECO-P5.</u></u></p>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Waka Kotahi	370.118	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P36 (Upgrading the National Grid within significant natural areas) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P36	Director-General of Conservation	385.32	Support	Supports proposed policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas).	Retain policy INF-ECO-P36 (Upgrading the National Grid within significant natural areas) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Transpower New Zealand Limited	315.115	Oppose	<p>The submitter does not oppose the identification of SNAs, but considers the policy approach has to be cognisant of the need to develop the National Grid and also give effect to the NPS-ET. Transpower proposes an amended policy approach specific to the National Grid [in general]. Considers that key to the approach is the recognition of the need to provide and enable the National Grid, whilst also providing a robust framework to manage effects. Specific to INF-ECO-P37, while Transpower accepts the policy does have regard to the route, site and method selection process, and operational needs, considers they apply in context of the policy chapeau to 'give priority to avoiding adverse effects'. Submitter queries how the term "give priority to avoiding adverse effects" would be implemented. Queries if this requires avoidance as the default position. Transpower's preference is for development within SNA's to be addressed in the specific National Grid development policy (within the INF chapter). Considers this would enable any new National Grid development to be considered in a comprehensive manner.</p>	<p>Delete INF-ECO-P37 (New development of National Grid within significant natural areas) in its entirety.</p> <p>[And add a new National Grid specific policy]</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Royal Forest and Bird Protection Society	345.63	Support in part	Notes incorrect reference to ECO-P2. Supports direction to give priority to avoiding adverse effects. Considers this policy confusing, as it covers different and potentially conflicting standards. Considers it would be simpler, and still meet the direction provided by the NPSET require adherence to ECO-P1, which contains an inherent consideration of the extent to which effects have been avoided, remedied or mitigated. Notes it is also subject to part 2, including the requirement to protect significant indigenous biodiversity under s6(c).	Amend INF-ECO-P37 (New development of National Grid within significant natural areas): Give priority to avoiding adverse effects of the National Grid on significant natural areas by applying the effects management hierarchy in ECO-P21 when located within significant natural areas, by: 1. Having regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and 2. Considering the constraints arising from the operational needs and functional needs of the National Grid, when considering measures to avoid, remedy or mitigate any adverse effects.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Greater Wellington Regional Council	351.94	Amend	Considers the wording of this policy is inconsistent with the 'avoid, minimise, remedy' direction of the effects management hierarchy in ECO-P1 and should be amended to be consistent.	Amend INF-ECO-P37 (New development of National Grid within significant natural areas) to reference the effects management hierarchy and ensure consistency with the 'avoid, minimise, remedy' direction in ECO-P1 (Protection of significant natural areas).
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Waka Kotahi	370.119	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-P37 (New development of National Grid within significant natural areas) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-P37	Director-General of Conservation	385.33	Support	Supports proposed policy INF-ECO-P37 (New development of National Grid within significant natural areas).	Retain policy INF-ECO-P37 (New development of National Grid within significant natural areas) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Royal Forest and Bird Protection Society	345.64	Oppose in part	Notes INF-ECO-S19 provides for cutting new tracks up to 2.5m wide in SNAs. Considers this is not appropriate as a permitted activity, and does not give effect to INF-ECO P33. Seeks either deletion of this activity from INF-ECO-S19, or amend this Permitted activity rule. Considers that new tracks should be a RD activity. Notes INF-ECO-S20 is not clear as to whether it applies to earthworks for the maintenance of existing tracks, or for new tracks. Considers that new tracks should not be a Permitted activity as this does not give effect to INF-ECO P33. Considers that new tracks should be clearly excluded from being a Permitted activity.	Amend INF-ECO-R41 (Operation, maintenance, repair, and removal of existing infrastructure within a significant natural area) to exclude new tracks from being a Permitted activity. Add new sub-rule making new tracks a Restricted Discretionary activity.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Royal Forest and Bird Protection Society	345.65	Oppose in part	Considers new tracks (vegetation trimming, removal and earthworks) for operation, maintenance repair and removal should be included in this RD activity rule. Considers this rule should not apply in the coastal environment where there are policy 11 (NZCPS) matters present. Seeks to amend the matters of discretion as they are considered too narrow to provide for proper consideration of biodiversity values, and do not give effect to INF-ECO P33. Considers this approach is out of step with the rest of the plan, which generally provides for matters of discretion that refer back to the relevant policies. Corresponding amendments to the assessment criteria for ECO-INF-S19 and ECO-INF-S20 have also been sought.	Amend INF-ECO-R41 (Operation, maintenance, repair, and removal of existing infrastructure within a significant natural area): 2. Activity status: Restricted Discretionary Where: a. Compliance with any of the requirements of INF-ECO-R41.1 cannot be achieved; and b. <u>The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Matters of discretion are: 1. <u>The matters in INF-ECO-P33 (or refer back to ECO P1)</u> 2. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Royal Forest and Bird Protection Society	345.66	Amend	Seeks new rule to give effect to policy 11 of NZCPS.	<p>Add new rule INF-ECO-R41.3 (Operation, maintenance, repair, and removal of existing infrastructure within a significant natural area):</p> <p><u>6. Activity status: Non Complying</u> <u>Where:</u> <u>a. Compliance with the requirements of INF-ECO R41.1 cannot be achieved; and</u> <u>b. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.</u></p>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	Waka Kotahi	370.120	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-R41 (Operation, maintenance, repair and removal of existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R41	KiwiRail Holdings Limited	408.67	Support	Supports the ability to operate, maintain, repair and remove existing infrastructure within a SNA as a permitted activity, subject to standards.	Retain INF-ECO-R41 (Operation, maintenance, repair and removal of existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Royal Forest and Bird Protection Society	345.67	Oppose in part	Considers it is unclear why the matters of discretion refer to the standards, as no standards appear to be relevant to the activity. Supports the matters of discretion referring back to INF-ECO-P33. Seeks that ECO-P1 is also referred to. If exemption suggested is accepted, then seeks that the rule become a Non-complying activity status for upgrading existing infrastructure.	<p>Amend INF-ECO-R42 (Upgrades to existing infrastructure within a significant natural area):</p> <p>1. Activity status: Restricted Discretionary</p> <p>Matters of discretion are:</p> <p>1. The matters in INF-ECO-P33 and <u>ECO-P1</u>; and</p> <p>1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard.</p> <p><u>Exemption: The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u></p> <p>Add new rule INF-ECO-R42.2:</p> <p><u>2. Activity status: Non Complying</u> <u>Where:</u> <u>1. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.</u></p>

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	Waka Kotahi	370.121	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-R42 (Upgrades to existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R42	KiwiRail Holdings Limited	408.68	Support	Supports the ability to upgrade existing infrastructure as a restricted discretionary activity and construct new infrastructure as a discretionary activity within a SNA.	Retain INF-ECO-R42 (Upgrades to existing infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Royal Forest and Bird Protection Society	345.68	Oppose	Considers this rule should have a non-complying activity status to give effect to S6(c) policy 11 NZCPS.	Amend INF-ECO-R43 (New infrastructure within a significant natural area): 1. Activity status: Discretionary Non-complying
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	Waka Kotahi	370.122	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-R43 (New infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R43	KiwiRail Holdings Limited	408.69	Support	Supports the ability to upgrade existing infrastructure as a restricted discretionary activity and construct new infrastructure as a discretionary activity within a SNA.	Retain INF-ECO-R43 (New infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Transpower New Zealand Limited	315.116	Oppose	<p>Considers that, specific to the National Grid, the NESETA manages the trimming, felling and removal of vegetation and earthworks, with the activity status under the NESETA determined by the provisions in the PDP. The NESETA provides for earthworks and trimming, felling or removal of any vegetation as permitted activities subject to conditions. Considers that the default activity status of Restricted discretionary under clause 3 does not reflect that provided under regulation 34 of the NESETA. Given the NESETA prevails, Transpower considers clause 1 of Rule R44 is not required as the control of earthworks within an SNA is managed under the NESETA. With respect to vegetation works, under Regulation 30 of the NESETA, resource consent is required under Regulation 31 (for a controlled activity) or Regulation 32 for a restricted discretionary activity) if:</p> <p>A. A rule prohibits or restricts the works (Reg 30(2)(a)); or</p> <p>B. The vegetation is in a “natural area” (a term defined in NESETA) (Reg 30(2)(b)). It is noted the standards within INF-ECO-S19 do not reflect that in the NESETA and therefore Transpower does not support them applying to the National Grid. The purpose of the NESETA is to provide a comprehensive, nationally consistent framework for existing National Grid Assets. Transpower opposes the imposition of rules to manage existing assets, noting those provided in Rule R44 do not reflect the NESETA. Considers the potential is for confusion over plan interpretation and implementation.</p> <p>[Refer to original submission for full reason]</p>	Opposes reference to the National Grid in INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area).

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Transpower New Zealand Limited	315.117	Amend	<p>Considers that, specific to the National Grid, the NESETA manages the trimming, felling and removal of vegetation and earthworks, with the activity status under the NESETA determined by the provisions in the PDP. The NESETA provides for earthworks and trimming, felling or removal of any vegetation as permitted activities subject to conditions. Considers that the default activity status of Restricted discretionary under clause 3 does not reflect that provided under regulation 34 of the NESETA. Given the NESETA prevails, Transpower considers clause 1 of Rule R44 is not required as the control of earthworks within an SNA is managed under the NESETA. With respect to vegetation works, under Regulation 30 of the NESETA, resource consent is required under Regulation 31 (for a controlled activity) or Regulation 32 for a restricted discretionary activity) if:</p> <p>A. A rule prohibits or restricts the works (Reg 30(2)(a)); or</p> <p>B. The vegetation is in a "natural area" (a term defined in NESETA) (Reg 30(2)(b). It is noted the standards within INF-ECO-S19 do not reflect that in the NESETA and therefore Transpower does not support them applying to the National Grid. The purpose of the NESETA is to provide a comprehensive, nationally consistent framework for existing National Grid Assets. Transpower opposes the imposition of rules to manage existing assets, noting those provided in Rule R44 do not reflect the NESETA. Considers the potential is for confusion over plan interpretation and implementation.</p> <p>[Refer to original submission for full reason]</p>	Amend INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area) by deleting reference to the National Grid from the rule.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Royal Forest and Bird Protection Society	345.69	Oppose in part	<p>INF-ECO-S19 provides for cutting new tracks up to 2.5m wide in SNAs, which is not considered appropriate as a permitted activity, and does not give effect to INF-ECO P33. Seeks to either delete this activity from INF-ECO-S19, or amend this Permitted activity rule. Considers new tracks should be RD activity. INF-ECO-S20 is not clear as to whether it applies to earthworks for the maintenance of existing tracks, or for new tracks - considers new tracks should not be Permitted as this does not give effect to INF-ECO P33. Considers new tracks should be clearly excluded from this Permitted activity rule.</p>	Amend INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area) to exclude new tracks from being a Permitted activity. Add new sub-rule making new tracks a Restricted Discretionary activity.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Royal Forest and Bird Protection Society	345.70	Oppose in part	<p>Considers that if this activity is to remain controlled, it should have some parameters around it, for example how close the vegetation removal needs to be to the lines to still come within the controlled rule.</p>	Add additional matters of control to INF-ECO-R22.2 to include additional parameters, e.g. how close vegetation removal can be to the lines to come within the Controlled activity status.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R44	Royal Forest and Bird Protection Society	345.71	Oppose in part	<p>INF-ECO-R44.3: Supports the matters of discretion referring back to INF-ECO-P33, and also seeks that ECO-P1 is referred to. Considers rule should include an exemption for SNA's not including matters listed in policy 11 of NZCPS. If exemption suggested is accepted, then seeks that the rule become a Non-complying activity status activities in SNA's with policy 11 matters.</p>	<p>Amend INF-ECO-R44 (Operation, maintenance and repair of existing National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area):</p> <p>3. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance with the requirements of INF-ECO-R44.1 or INF-ECO-R44.2 cannot be achieved.</p> <p>Matters of discretion are:</p> <p>1. The extent and effect of non-compliance with any relevant standard not met as specified in the associated assessment criteria for the infringed standard; and</p> <p>2. The matters in INF-ECO-P33 and <u>ECO-P1</u>.</p> <p><u>Exemption: The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u></p> <p>Add new sub-rule INF-ECO-R44.4:</p> <p><u>4. Activity status: Non Complying</u></p> <p><u>Where:</u></p> <p><u>1. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal</u></p>

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					<p><u>Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.</u></p>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R45	Transpower New Zealand Limited	315.118	Oppose	<p>Considers that, specific to the National Grid, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ("NESETA") provides prevailing provisions for maintenance, reconductoring, increasing voltage, structure addition or replacement, and removal, for the National Grid, and on this basis, INF-ECO-R45 for existing National Grid structures captured by the NESETA is of limited relevance to Transpower in respect of rule application. It is noted the NESETA provides a Discretionary activity status under Regulations 39 of the NESETA for those activities subject to the NESETA but not otherwise captured under other regulations in the NESETA. The purpose of the NESETA is to provide a comprehensive, nationally consistent framework for existing National Grid Assets. Transpower opposes the imposition of rules to manage existing assets and instead seeks reliance on the NESETA.</p>	<p>Delete Rule INF-ECO-R45 (Upgrading of existing National Grid (NG) infrastructure within a significant natural area) in its entirety.</p>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R45	Royal Forest and Bird Protection Society	345.72	Support in part	<p>Supports matters of discretion referring to INF-ECO-P36 subject to the submission point made on that policy. Seeks that ECO-P1 also be referred to. If exemption suggested is accepted, then seeks that the rule become a Non-complying activity status for upgrading existing infrastructure.</p>	<p>Amend INF-ECO-R45 (Upgrading of existing National Grid (NG) infrastructure within a significant natural area):</p> <p>1. Activity status: Restricted Discretionary Matters of discretion are: 1. The matters in INF-ECO-P36 and <u>ECO-P1.</u> <u>Exemption: The significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u></p> <p>Add new sub-rule:</p> <p><u>2. Activity status: Non-complying</u> <u>Where:</u> 1. <u>The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.</u></p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R46	Royal Forest and Bird Protection Society	345.73	Support in part	Supports the matters of discretion referring back to INF-ECO-P39, subject to amendments sought on that policy. Seek that ECO-P1 is also referred to. Should include exemption for activities in SNAs not containing any policy 11 matters. Seeks to add subsequent Non-complying activity status rule for activities in breach of this exemption.	Amend INF-ECO-R46 (Upgrading existing gas transmission pipeline corridor within a significant natural area): 1. Activity status: Restricted Discretionary Where: a. The infrastructure is located underground; or b. The infrastructure is located within an existing road reserve. <u>Exemption: the significant natural area does not contain any matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> Matters of discretion are: The matters in INF-ECO-P36 <u>and ECO-P1.</u> <u>Add new sub-rule INF-ECO-R46.X:</u> <u>Activity status: Non Complying</u> Where: <u>1. The significant natural area includes matters identified in Policy 11 of the New Zealand Coastal Policy Statement 2010 where located within the Coastal Environment.</u> <u>Section 88 information requirements for applications:</u> <u>Applications for activities within an identified significant natural area must provide, in addition to the standard information requirements, an ecological assessment in accordance with APP15:</u> <u>1. Identifying the indigenous biodiversity values and potential impacts from the proposal; and</u> <u>2. Demonstrating that ECO P5 (or refer to the new policy 11 policy sought above) has first been met, and the effects management hierarchy at ECO-P1 has been applied to other adverse effects.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R46	Royal Forest and Bird Protection Society	345.74	Oppose in part	Considers the activity should be non-complying.	Amend INF-ECO-R46 (Upgrading existing gas transmission pipeline corridor within a significant natural area): 2. Activity status: Discretionary <u>Non-complying</u> Where: Compliance with any of the requirements of INF-ECO-R46.1 cannot be achieved.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R47	Transpower New Zealand Limited	315.119	Support	Considers the activity status and associated policies provide an appropriate framework in which to manage the National Grid.	Retain INF-ECO-R47 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-R47	Royal Forest and Bird Protection Society	345.75	Oppose in part	Considers this rule should have a non-complying activity status.	Amend INF-ECO-R47 (New National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC) infrastructure within a significant natural area): 1. Activity status: Discretionary <u>Non-complying</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Fire and Emergency New Zealand	273.42	Support in part	Considers that a new assessment matter should be added in order to ensure that fire risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area), with amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Fire and Emergency New Zealand	273.43	Amend	Considers that a new assessment matter should be added in order to ensure that fire risk mitigation is taken into account when assessing applications to trim or remove indigenous vegetation in areas subject to high fire risk.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as follows: Assessment criteria: ... <u>3. The degree to which the trimming or removal of affected vegetation will provide for the health and safety of people, property, and the environment through the management of fire risk.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Royal Forest and Bird Protection Society	345.76	Oppose in part	Considers the width in paragraph 1 should be limited to 2m to accommodate an existing track. Opposes new tracks being a Permitted activity. Replace assessment criteria with that listed under ECO-S1 to give effect to INF-ECO-P33.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area): 1. Trimming or removal of indigenous vegetation or trees within a significant natural area must be limited to 2m within the footprint of existing infrastructure, access tracks or fences to accommodate an existing track. Assessment criteria: 1. Operational or functional needs of infrastructure; and 2. The effect of the activity and removal on the identified biodiversity values of the significant natural area and the measures taken to avoid, minimise or remedy the effects and where relevant the ability to offset biodiversity impacts. <u>1. The extent to which the trimming or removal of indigenous vegetation limits the loss, damage or disruption to the ecological processes, functions and integrity of the significant natural area; and</u> <u>2. The effect of the vegetation removal on the identified biodiversity values.</u>
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Greater Wellington Regional Council	351.95	Amend	Considers that Policy 24 of the RPS directs councils to protect indigenous ecosystems and habitats with significant indigenous biodiversity values. The 'identified' qualifier limits the consideration of effects to those values identified within the SNA at the time of plan notification. The values of most SNAs have been identified only at a high-level, and often only through desktop analysis. The assessment required to identify the scope of effects may identify additional values and this should be part of the consideration of effects at the time consent is applied for.	Seeks to amend wording to remove 'identified' before 'significant biodiversity values' when referring to adverse effects caused by activities or maintenance of biodiversity values.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Greater Wellington Regional Council	351.96	Amend	Vegetation trimming standards and rules should be amended so that they also apply to both indigenous and non-indigenous vegetation. This would make it clear that all vegetation (aside from pest plants) is to be protected in these areas, except where otherwise specified for restoration or other purposes. Any non-indigenous plants within SNAs that are not pest plants may provide significant habitat for indigenous biodiversity such as birds, bats and lizards. This understanding is recognised in section 6(c) of the Act which directs the protection of the "significant habitats of indigenous fauna" not the significant indigenous habitats of indigenous fauna.	Seeks to amend standard (where relevant) to change 'indigenous vegetation' to 'vegetation'.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Wellington Electricity Lines Limited	355.47	Support	Supports INF-ECO-S19 for its aspirations to protect and enhance the City's SNA. Notwithstanding this support, it is considered appropriate to enable the continued safe and efficient operation of electricity lines though the provisions of the Electricity (Hazards from Trees) Regulations 2003 or the Telecommunications Act 2001.	Retain INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as notified.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	Waka Kotahi	370.123	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S19	KiwiRail Holdings Limited	408.70	Amend	Supports a standard for trimming or removing indigenous vegetation within a SNA. However, KiwiRail request the limit for this be increased to 5m within the footprint of existing infrastructure. KiwiRail typically clear vegetation within 5m of railway tracks as part of routine corridor maintenance throughout the country. This is the optimum clearance distance to ensure the rail network can operate safely and efficiently.	Amend INF-ECO-S19 (Trimming or removal of indigenous vegetation or trees within a significant natural area) as follows: 1. Trimming or removal of indigenous vegetation or trees within a significant natural area must be limited to <u>5m</u> 2m within the footprint of existing infrastructure, access tracks or fences.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Chorus New Zealand Limited (Chorus), Spark New Zealand Trading Limited (Spark) and Vodafone New Zealand Limited (Vodafone)	99.51	Oppose	INF-ECO-S20 should be amended to at least provide a nominal allowance for other infrastructure that may require some localised earthworks in significant natural areas (e.g. for maintenance and upgrading). The provision provides for 50m ³ of earthworks per transmission line support structure as a permitted activity and is otherwise consistent with the Resource Management (National Environmental Standards for Electricity Transmission Line Activities) Regulations 2009. The Auckland Unitary Plan for example provides for 5m ³ of earthworks in significant natural areas for infrastructure works.	Amend INF-ECO-S20 (Earthworks within a significant natural area) as follows: 1. Earthworks within a significant natural area must not exceed: a. More than 50m ³ per transmission line support structure; or b. More than 5m³ for other infrastructure; or b. c. 100m³ per access track.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Powerco Limited	127.33	Oppose	Considers that whilst this is consistent with the Resource Management (National Environmental Standards for Electricity Transmission Line Activities) Regulations 2009, there should be at least a nominal allowance for other infrastructure that may require some localised earthworks in significant natural areas (e.g. for maintenance and upgrading). The Auckland Unitary Plan for example provides for 5m ³ of earthworks in significant natural areas for infrastructure works.	Amend standard INF-ECO-S20 (Earthworks within a significant natural area) as follows: 1. Earthworks within a significant natural area must not exceed: a. More than 50m ³ per transmission line support structure; or b. More than 5m³ for other infrastructure; or b. c. 100m³ per access track.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Royal Forest and Bird Protection Society	345.77	Oppose in part	Considers that this should be limited to maintenance of existing tracks if it is to be a Permitted activity. Replace assessment criteria with that listed under ECO-S1 to give effect to INF-ECO-P33.	Amend INF-ECO-S20 (Earthworks within a significant natural area): 1. Earthworks within a significant natural area must <u>be limited to maintenance of existing tracks. not exceed:</u> More than 50m³ per transmission line support structure; or 100m³ per access track. Assessment criteria: 1. Operational or functional needs of infrastructure; and 2. The effect of the activity and removal on the identified biodiversity values of the significant natural area and the measures taken to avoid, minimise or remedy the effects and where relevant the ability to offset biodiversity impacts. 1. The extent to which the earthworks limits the loss, damage or disruption to the ecological processes, functions and integrity of the significant natural area; and 2. The effect of the earthworks on the identified biodiversity values.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Greater Wellington Regional Council	351.97	Amend	Considers that Policy 24 of the RPS directs councils to protect indigenous ecosystems and habitats with significant indigenous biodiversity values. The 'identified' qualifier limits the consideration of effects to those values identified within the SNA at the time of plan notification. The values of most SNAs have been identified only at a high-level, and often only through desktop analysis. The assessment required to identify the scope of effects may identify additional values and this should be part of the consideration of effects at the time consent is applied for.	Seeks to amend wording to remove 'identified' before 'significant biodiversity values' when referring to adverse effects caused by activities or maintenance of biodiversity values.

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Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Wellington Electricity Lines Limited	355.48	Support in part	Supports INF-ECO-S20 as it provides stricter earthworks parameters for infrastructure within a demonstrable SNA. Considers that sub-clause b should be amended so as not to only apply to 'transmission'. [Submitter refers to sub-clause b, but requests amendment in sub-clause a]	Retain INF-ECO-S20 (Earthworks within a significant natural area) with amendment.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Wellington Electricity Lines Limited	355.49	Amend	Considers that INF-ECO-S20 should be amended so sub-clause a does not only apply to 'transmission'. [Submitter refers to sub-clause b, but requests amendment in sub-clause a]	Amend INF-ECO-S20 (Earthworks within a significant natural area) as follows: 1. Earthworks within a significant natural area must not exceed: a. More than 50m ³ per transmission electricity line support structure; or b. 100m ³ per access track.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	Waka Kotahi	370.124	Support	These provisions provide clear guidance in how to balance different interests where infrastructure overlaps with other areas and values.	Retain INF-ECO-S20 (Earthworks within a significant natural area) as notified.
Energy Infrastructure and Transport / Infrastructure Ecosystems and Biodiversity / INF-ECO-S20	KiwiRail Holdings Limited	408.71	Support	Supports a standard for earthworks within a SNA, noting 100m ³ per access track is permitted by this standard.	Retain INF-ECO-S20 (Earthworks within a significant natural area) as notified.